



**NATIONAL AGRICULTURAL VALUE
CHAIN DEVELOPMENT PROJECT
(NAVCDP)**



MINISTRY OF AGRICULTURE AND LIVESTOCK DEVELOPMENT

STATE DEPARTMENT FOR AGRICULTURE

**National Agricultural Value Chain Development Project
(P176758 - NAVCDP)**

STAKEHOLDER ENGAGEMENT PLAN

Updated January 2026

TABLE OF CONTENTS

ACRONYMS AND ABBREVIATIONS	vi
EXECUTIVE SUMMARY	1
I. INTRODUCTION	3
1.1 Background	3
1.2 Project Geographical Coverage.....	5
1.3 Project Components	6
1.4 Project Design	14
1.5 Contribution of AF to NAVCDP	15
1.6 Stakeholder Engagement Context.....	17
1.7 Legal Requirements for Stakeholder Engagement	18
1.8 Stakeholder Identification and Analysis.....	19
1.9 Project Components and Stakeholder Engagement Areas.....	21
1.10 NAVCDP Screening and Compliance Procedures	0
1.11 Summary of Potential Environmental and Social Impacts/Risks	3
2. POLICY, LEGAL, AND INSTITUTIONAL FRAMEWORK	4
2.1 INTRODUCTION	4
3. PURPOSE AND TIMING OF STAKEHOLDER ENGAGEMENT	45
3.1 Introduction	45
3.2 Vulnerable and Marginalized Groups	46
3.3 Purpose and Timing of Stakeholder Engagement Program	47
3.4 Strategy for Information Disclosure.....	47
4. PAST STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN	47
4.1 NAVCDP Scoping Mission	47
4.2 Consultation and Information Disclosure on ESS Instruments and Plans.....	50
4.3 Virtual Stakeholders Consultation on Child Labour - March 2022.....	53
4.4 Stakeholders Engagement on Selection of Priority Value Chains - July 2023.....	55
4.5 Stakeholder Consultation Forum - February 2024	63
4.6 Stakeholder Consultation Forum on Additional Financing - January 2026	67
4.7 Information Disclosure	68
5. TRAINING AND CAPACITY BUILDING	79
6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING NAVCDP STAKEHOLDER ENGAGEMENT ACTIVITIES	79
6.1 Stakeholder Engagement Methods, Tools and Techniques.....	81
6.2. Roles and responsibilities for SEP implementation at NPCU.....	91
6.3. SEP Implementation Budget.....	95
7. STAKEHOLDER INVOLVEMENT IN NAVCDP MONITORING	96
8. GRIEVANCE MECHANISM	97
8.1 Overview	97
8.2 Grievance Mechanism Structures	98
8.4 Grievance Log Management.....	102

8.5 GM Information Disclosure	103
8.6 Monitoring and Reporting on Grievances	103
8.7 Points of Contact.....	104
8.8 World Bank Grievance Redress Service.....	104
ANNEXES	106
Annex 1a: List of Identified Stakeholders (At Appraisal)	106
Annex 1b: List of Identified Stakeholders (At Implementation).....	106
Annex 2a: Public Consultation Workshop on NAVCDP ESS Core Framework and Plans .	108
Annex 2b: Public Consultation Workshop on NAVCDP ESS Core Framework and Plans .	108
Annex 3: Virtual Stakeholders Consultation on Child Labour Held on March 16, 2022	110
Annex 4: Review Workshop - Additional Counties and Value Chains: List of Participants 12.02.2024.....	111
Annex 5: Additional Financing Stakeholder Engagement Workshop - Naivasha Burch's Resort - 21.01.2026	116
Annex 6: Grievance Log Form.....	139
Annex 7: Grievance Register	141
Annex 8: NAVCDP County Priority Value Chains	142

List of Tables

Table 1: Summary of Project Stakeholder Needs	21
Table 2: NAVCDP Components, Ongoing Activities, and, Proposed AF Interventions.....	23
Table 3: Environmental and Social documentation for NAVCDP	1
Table 4: Potential Environmental and Social Risks/Impacts and Mitigation Measures	3
Table 5: Policy, Legal, and Institutional Framework Gap Analysis	5
Table 6: NAVCDP Project Counties with Indigenous Peoples	46
Table 7: Key Stakeholder Concerns and Project Responses.....	48
Table 8: Stakeholder Engagement and Disclosure Methods.....	51
Table 9: Summary of Key Issues Discussed and Recommendations	53
Table 10: Value Chain Selection Stakeholder Concerns and Project Reponses	55
Table 11: Stakeholder Concerns Raised during Plenary Discussion.....	57
Table 12: List of Prioritized Value chains at the Project Counties	59
Table 13: Stakeholder Concerns and Project Responses -12 February 2024	63
Table 14: Summary of Issues Raised and Project Responses -12 February 2024.....	65
Table 15: Information Disclosure Plan at Different Stages of the project Cycle.....	68
Table 16: Planned Stakeholder Engagement Activities for NAVCDP	73
Table 17: Proposed Training Modules for Stakeholders	79
Table 18: Stakeholder Engagement Methods, Tools and Techniques	82
Table 19: Roles and Responsibilities for the NPCU and CPCUs.....	91
Table 20: NAVCDP Stakeholder Engagement Training Modules and Budget	95
Table 21: Summary of GM Response Timelines.....	102

List of Figures

Figure 1: Location Map of Updated NAVCDP Project Counties.....5
Figure 2: Community - Grievance Mechanism99
Figure 3: Worker - Grievance Mechanism101

ACRONYMS AND ABBREVIATIONS

AF	Additional Financing
AFA	Agriculture and Food Authority
ARAP	Abbreviated Resettlement Action Plan
CESCO	County Environmental Safeguards Compliance Officer
CDDC	Community Driven Development Project
C-ESMP	Contractor's Environmental and Social Management Plan
CFA	Community Forest Associations
CIGs	Common Interest Groups
CoK	Constitution of Kenya
COVID-19	Coronavirus Disease
CPCU	County Project Coordination Unit
CPR	Comprehensive Project Report
CSO	Civil Society Organization
CSS&GMO	County Social Safeguards & Gender Mainstreaming Officer
CTDs	County Technical Departments
DAP	Differently Abled Persons
DAT	Disruptive Agricultural Technologies
E&S	Environmental and Social
EHS	Environmental Health and Safety
EPRP	Emergency Preparedness Response Plan
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
FF&PS	Farmer Field and Pastoral School
FFS	Farmer Field School
FPIC	Free, Prior, and Informed Consultation
FPOs	Farmer Producer Organizations
GDP	Gross Domestic Product
GBV	Gender Based Violence
GIIP	Good International Industry Practice
GGMC	Grievance Redress Management Committee
GM	Grievance Mechanism
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
GRS	Grievance Redress Service
HCDA	Horticultural Crops Development Authority
IAs	Implementing Agencies
IDA	International Development Association
IP/SSA/HUTLC	Indigenous Peoples / Sub-Saharan African Historically Underserved Traditional Local Communities
IPMP	Integrated Pest Management Plan
IPOs	Indigenous Peoples Organizations
KADIC	Kenya Agricultural Digital Information Centre
KAGRC	Kenya Artificial Insemination and Genetic Research Centre
KALRO	Kenya Agriculture and Livestock Research Organization

KCSAP	Kenya Climate Smart Agriculture Project
KEBS	Kenya Bureau of Standards
KEPHIS	Kenya Plant Health Inspectorate Service
KEPSA	Kenya Private Sector Association
KIAMIS	Kenya Integrated Agriculture Management Information System
KMC	Kenya Meat Commission
KPIs	Key Performance Indicators
LMP	Labour Management Plan
MCI	Multicommodity Investments
MoALD	Ministry of Agriculture and Livestock Development
NARIGP	National Agricultural and Rural Inclusive Growth Project
NAVCDP	National Agricultural Value Chain Development Project
NEMA	National Environment Management Authority
NERC	National Emergency Response Committee
NESSL	National Environment and Social Safeguards Lead
NGOs	Non-Governmental Organizations
NLC	National Land Commission
NLP	National Land Policy
NPC	National Project Coordinator
NPCU	National Project Coordination Unit
OHS	Occupational Health and Safety
PAI	Project Area of Influence
PAPs	Project Affected Persons
PCU	Project Coordination Unit
PDO	Project Development Objective
PICD	Participatory Integrated Community Development
PIA	Project Implementation Area
PIM	Project Implementation Manual
PoEs	Panel of Experts
POs	Producer Organizations
PPP	Public–Private Partnerships
PVC	Priority Value Chain
PWDs	Persons with Disabilities
Q&A	Questions and Answers
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SACCO	Savings and Credit Cooperative Organization
SC	Steering Committee
SEAH	Sexual Exploitation, Abuse, and Harassment
SEP	Stakeholder Engagement Plan
SMP	Security Management Plan
SPR	Summary Project Report
STE	Short-Term Expert
TIMPs	Technologies, Innovations and Management Practices
TSA	Technical Support Agencies
TV	Television
TWG	Technical Working Group
VC	Value Chain

VMG	Vulnerable and Marginalized Group
VMGF	Vulnerable and Marginalized Groups Framework
VMGP	Vulnerable and Marginalized Groups Plan
WMP	Waste Management Plan
WRUAs	Water Resource Users Associations

EXECUTIVE SUMMARY

The National Agricultural Value Chain Development Project is designed to contribute to the transformation of the smallholder farming systems by facilitating transition for subsistence to commercial farming through increased agricultural productivity, value addition and market participation. The project intensifies on farmer mobilization, infrastructure investments in the select value chains, support farmer led irrigation development especially at the individual farmer level, enhance access to credit and financial services, and develop proof of concept on urban food systems and peri-urban agriculture. The project covers and saturates 32 counties and also implements safer urban food systems in urban and peri-urban wards of Nairobi and Mombasa Counties.

Project Development Objective is to *“increase market participation and value addition for targeted farmers in select value chains in the project areas”*. The specific objectives of the project are to: (i) increase in farmers selling more than 50% of their produce in the market; (ii) Increase in farmers selling produce in value added form (both off/on-farm); (iii) Farmers reached with agricultural assets/services of which at least 50 % are female.

The Ministry of Agriculture and Livestock Development, State Department for Agriculture (SDA) is the project implementing agency while 26 Counties were the executing agencies in the initial project design. The project commenced on 8th March, 2022 and is expected to end on 31st December, 2027. The project is funded by the World Bank- International Development Association (IDA) and co-financed by Government of Kenya counterpart funding. The approved project financing amount to US\$ 275 million, composed of IDA US\$ 250 million and GoK Counterpart funding US\$25 million.

During the launch of the project in 2023, the Council of Governors appealed for the inclusion of 8 County Governments namely: Kajiado, Tharaka Nithi, Bungoma, Nyamira, Siaya, Vihiga and Kisumu in the project implementation. This is in addition to Nairobi and Mombasa Counties implementing Urban Food System. To ensure inclusivity, the project was saturated to cover all administrative wards in the selected counties resulting to an increase from 520 to 1,075 Wards in 34 counties. The project currently covers 34 counties namely: Kirinyaga, Kiambu, Murang’a, Embu, Meru, Tharaka Nithi, Nyeri, Machakos, Makueni, Kitui, Trans Nzoia, Nandi, Uasin Gishu, Narok, Kajiado, Nakuru, Bomet, Kericho, Nyandarua, Kisii, Nyamira, Migori, Homa Bay, Siaya, Kisumu, Kakamega, Vihiga, Busia, Bungoma, Kwale, Kilifi and Taita Taveta, Nairobi and Mombasa. Access link for all the ESS documents can be accessed in the following link: <https://kilimo.go.ke/national-agricultural-value-chain-development-projectnavcdp/> Initial project design was to cover only 20 wards per County. However, with the adoption of the saturation model, each project county would cover all the wards and reach every farmer. As a result, an additional of 555 wards from the original 520 were added bringing the project wards to 1075. The wider geographical scope had a related increase in the number of beneficiaries from 500,000 to 2.3 million, the beneficiaries were organized into community institutions including

CIGs/VMGs, CDDCs that are linked to both FPOs and SACCOs. The number of these community institutions also increased significantly.

The objective of the Additional Financing is to effectively address the expanded scope for the remaining and extended period to ensure realization of the Project Development Objectives (PDO) by seeking an additional US\$ 250 million for NAVCDP. The Financing will be allocated to the project components to finance the extended scope as follows; US\$ 100 million will be added to Component 1. US\$ 100 million will be added to Component 2; US\$ 25 million will be added to Component 3 and US\$ 25 million will be added to Component 4.

I. INTRODUCTION

I.1 Background

- 1) The National Agricultural Value Chain Development Project (NAVCDP) is a Government of Kenya initiative implemented by the Ministry of Agriculture and Livestock Development, and funded by the World Bank, through the International Development Association (IDA) and co-financing from participating county governments. The Project Development Objective is to “*increase market participation and value addition for targeted farmers in select value chains in the project areas*”. The project, which was approved in March 2022 with an initial financing envelope of US\$275 million, became effective in September 2022 and was launched in January 2023. It builds on the foundation set by the National Agricultural and Rural Inclusive Growth Project (NARIGP) and the Kenya Climate Smart Agriculture Project (KCSAP). While these predecessor projects successfully focused on building producer capacity and scaling climate-resilient productivity, NAVCDP deepens these investments by intensifying market linkages, scaling up value addition, and supporting farmer-led irrigation.
- 2) The specific objectives of the NAVCDP are to: (i) increase the proportion of farmers selling more than 50 percent of their produce in the market; (ii) increase the number of farmers selling produce in value-added form (both on-farm and off-farm); and (iii) increase the number of farmers reached with agricultural assets and services, of whom at least 50 percent are women.
- 3) NAVCDP targeted 500,000 farmers across 26 counties and approximately 520 wards, focusing on twelve (12) priority agricultural value chains. Following the project strong demand and sustained appeal from both national and county stakeholders, the project scope was expanded to 34 counties, applying a saturation model to cover all administrative wards in the participating counties. This brought the total number of wards to 1,075. In addition, the number of priority value chains was increased from 12 to sixteen (16). This expanded scope included urban and peri-urban food systems interventions in Nairobi, Mombasa, and surrounding clusters.
- 4) By September 2025, NAVCDP had reached 1,329,542 farmers with agricultural assets or services, while approximately 2.3 million farmers had been mobilized into 173,116 groups through the Participatory Integrated Community Development (PICD) process. In addition, about 535,560 farmers had adopted improved technologies and climate-smart agricultural practices, 25,229 farmers had gained access to irrigation, and 5,245 digitally equipped agripreneurs were actively linking farmers to inputs, services, and markets across rural and peri-urban value chains.
- 5) In light of the expanded geographic and thematic scope of the Project, achievement of the PDO requires a restructuring of financing arrangements and the mobilization of additional resources. Accordingly, the Government of Kenya has submitted a request for Additional Financing (AF) in the amount of US\$250 million from the IDA to scale up the NAVCDP. The

objective of the AF is to support the continuation and expansion of high-impact interventions, including farmer mobilization, farmer-led irrigation development (FLID), market and value-addition infrastructure, digital agriculture platforms, strengthening and unionization of SACCOs, and food safety systems. These investments are intended to sustain implementation momentum, deepen market participation, and further strengthen agricultural value chain development.

- 6) This Stakeholder engagement is central to achieving NAVCDP's objectives. For the purposes of this SEP, *key stakeholders* include project-affected persons; farmers and farmer producer organizations (FPOs); vulnerable and marginalized groups (including Indigenous Peoples, women, youth, and persons with disabilities); community institutions and cooperatives; county and national government entities; private sector actors; civil society organizations; and development partners. The Additional Financing (AF) introduces new consultation areas, including food safety and traceability, digital integration, SACCO unionization, and expanded irrigation, requiring tailored approaches to ensure inclusive, transparent, and meaningful participation.

This updated Stakeholder Engagement Plan (SEP) therefore:

- i. Reflects the expanded geographical and institutional scope of NAVCDP, now covering 34 counties, 1,075 wards, and 16 value chains. Additionally, the project supports three (3) value chains prioritized through BETA, namely maize, tea and edible oils in the development of their Development Strategies.
- ii. Aligns with the World Bank's Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure.
- iii. Provides strategies for inclusive, transparent, and iterative consultations across national, county, and community levels, combining digital platforms, including Kenya Integrated Agriculture Management Information System (KIAMIS), Disruptive Agricultural Technologies (DAT) services, and Kenya Agriculture Data and Information Centre (KADIC), with traditional forums such as barazas, focus group discussions, and county workshops.
- iv. Ensures that stakeholders remain informed and actively involved in shaping project design, implementation, monitoring, and grievance redress, thereby reinforcing transparency, accountability, and inclusivity.

I.2 Project Geographical Coverage

7) Following the approved expansion of NAVCDP, the project is now implemented in 34 counties and 1,075 wards, including urban and peri-urban food systems interventions in Nairobi and Mombasa and their surrounding clusters. The spatial distribution of project areas is shown in Figure I.

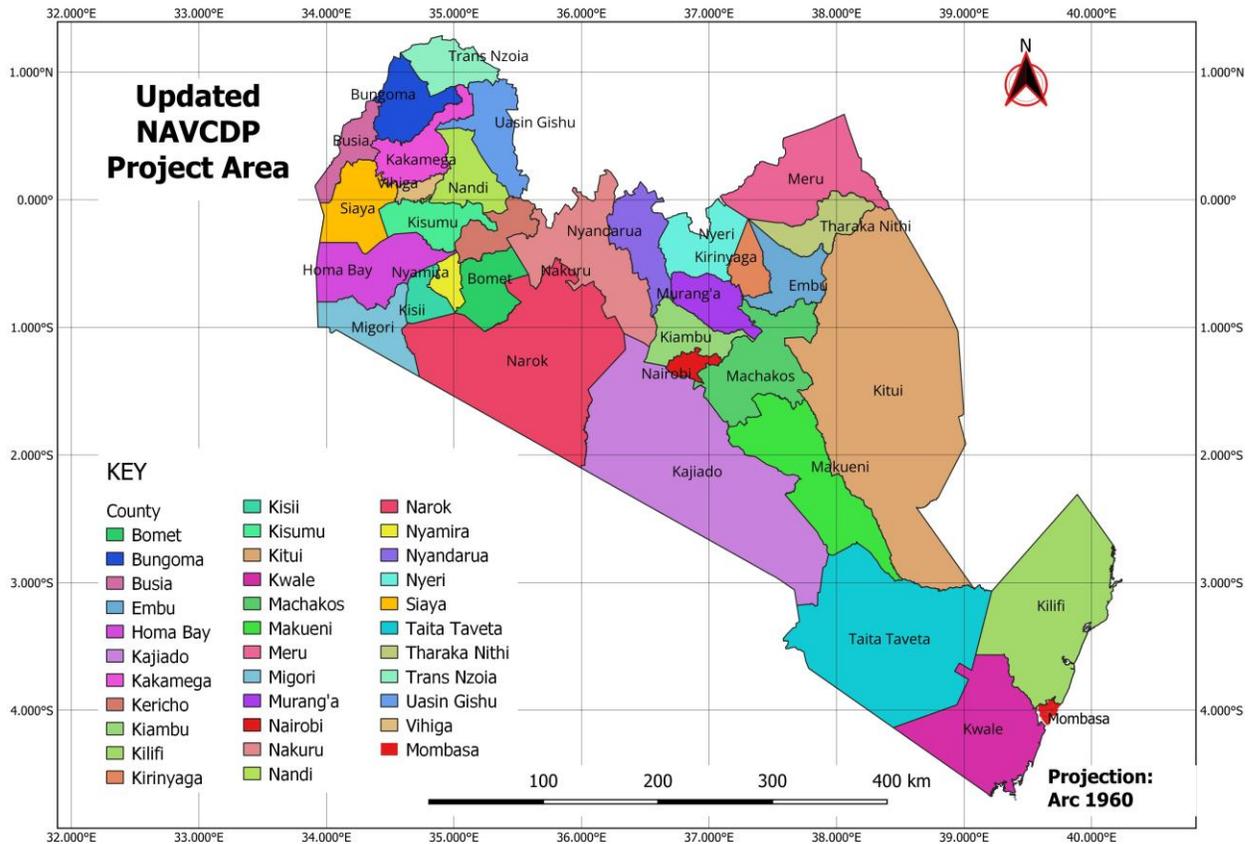


Figure I: Location Map of Updated NAVCDP Project Counties

I.3 Project Components

- 8) The project has five components, namely: (i) Building Producer Capacity and e-Voucher Support for Climate Resilient Stronger Value Chains, (ii) Climate Smart Value Chain Ecosystem Investments, (iii) Climate Smart Safer Urban Food Systems, (iv) Project Coordination and Management, and (v) Contingent Emergency Response. The description of the components and their performance at mid-term is as summarized below:

Component 1: Building Producer Capacity for Climate Resilient Stronger Value Chains

- 9) The component aims to build producer level capacity for enhanced market participation and transition towards commercial agriculture with farmers' groups and FPOs as primary platforms for delivery. It focuses on sustainable productivity enhancement, climate resilient and nutrition sensitive production and increasing market participation for project farmers through improved access to credit, inputs, compliance to environmental and social safeguard requirements, digital extension services while linking them to high capacity FPOs.

Subcomponent 1.1: Farmer capacity building and E-voucher support

- 10) This sub-component focuses on building smallholder farmer capacity for enhanced climate resilience, improved production and market participation. It focuses on community institutions development, farmers capacity building and e-voucher support. Community institutions development involves establishment, development and capacity building of community institutions - CIGs/VMGs, CDDCs, FPOs, SACCOs and (WUAs/IWUAs.) These institutions form the foundation on which all other project inputs are delivered. Community mobilization has been undertaken through the PICD process in 33 counties, across 1,069 wards. In total, 1,069 CDDCs, 1,069 Sustainable Land Management Committees (SLMCs), 1,039 SACCOs, 837 FPOs and 237 Irrigation Water users Associations (IWUAs) /Water Users Associations (WUAs) of which 113,455 CIG/VMGs have been established, and approximately 2.3 million farmers mobilized. To strengthen community institutions, an assessment was undertaken, specifically for SACCO and FPOs, to identify gaps for informed interventions and a training manual for building the capacity of the FPOs and SACCOs was developed. At mid-term, 44,307 out of 113,455 CIGs/VMGs had been linked to FPOs, while only 453,192 project beneficiaries had joined SACCOs.
- 11) The farmer capacity building and e-voucher support (extension services) thematic area aims at building capacity of smallholder farmers for enhanced climate resilience, improved production and market participation and sensitizing on e-voucher services. The project leverages on the capacity build by KCSAP and NARIGP on TIMPs trainings, County Technical Departments (CTDs) have cascaded TIMPs training to tier 2 and 3. A total of 62,982 (54.1%) extension agents have been trained to train 696,694 (35.9% of the targeted farmers). Approximately 2,811 farmer-led demo plots have been established, representing VMGs (1,444) and CIGs (1,367).

12) The farmer capacity building and e-voucher support (Extension services) thematic focuses on building capacity of smallholder farmers for enhanced climate resilience, improved production and market participation and sensitizing on e-voucher services. The project leverages on the capacity build done by KCSAP and NARIGP on TIMPs trainings. County Technical Departments (CTDs) cascaded TIMPS training to tier 2 and 3. A total of 62,982 (54.1 %) extension agents (SCTTS/WTTS, Agripreneurs, FPO agents and lead farmers) have been trained to train 696,964 farmers who represent 35.9 % of the targeted farmers. A total of 2,811 farmer led Demos have been established representing VMG (1,444) and CIG (1,367) on crop varieties, animal feeds agronomic and value addition practices among the TIMPs.

Sub component 1.2 Farmer producer organization (FPO) level climate smart value chain investment

13) This sub-component is focused on nurturing strong, market oriented FPOs to enhance market participation and value realization for member small farmers and CIGs. Significant progress has been made in implementation of activities under this sub-component with over 800 FPOs mobilized, 44,307 CIGs/VMGs federated to the FPOs with total members of 1,400,000 members linked into the FPOs.

Sub component 1.3 Improve Credit Worthiness of CIGs/VMGs and FPOs

14) This sub-component aims to improve access to affordable credit to project beneficiaries to support them adopt TIMPs and improve their cash flows, including small scale farmers involved in small farm led irrigation, improved soil & water management measures among others through the SACCOs. At mid-term, a total of 1,039 (97%) agriculture-based SACCOs in 34 counties across 1,075 wards had been registered and operationalized. A total 775 SACCOs had been automated to enable cashless transfer of money, enhancing transparency, accountability, real time reporting and operational efficiency. A total of 9,760 out of 13,000 SACCO stakeholders had been trained on SACCO Manuals, Cooperative Governance, Leadership and Sustainability mechanism to strengthen their skills and knowledge. The collective 1,039 SACCOs had attained membership of 453,192 individuals and 25,819 CIGs/VMGs at mid-term.

Component 2: Climate Smart Value Chain Ecosystem Investments

Subcomponent 2.1: Farmer Led Irrigation Development

15) At midterm, the FLID component registered notable progress, particularly in community mobilization, institutional strengthening, and farmer capacity building. A total of 44,065 farmers had been trained on FLID and sustainable land management (SLM), while 163 IWUAs had been equipped with governance, operations, and maintenance skills. In addition, 32 County Irrigation Development Units (CIDUs) had been established to spearhead irrigation development, though their performance remains constrained by limited county budget allocations.

16) On FLID infrastructure, the project has facilitated the construction of 734 farm ponds, contributing to the additional 2,056 hectares under FLID. Modernization of smallholder irrigation schemes is also underway, with 80 concepts submitted, 56 approved, and 29 proposals advanced to procurement from which 10% of target area under irrigation is to be achieved once fully implemented. Approximately, 22,923 farmers have been linked to 16 irrigation technology suppliers and 18 financial institutions through accelerator platforms. On SLM, 8,769 hectares have been rehabilitated against a target of 40,000, with 26 watershed proposals approved to upscale interventions over 28,639 hectares. Overall, while infrastructure rollout has been slower than anticipated, the project has laid a strong foundation in institutional capacity, farmer linkages, and watershed management to accelerate delivery of its objectives.

Sub-component 2.2: Market access and infrastructure development

17) Significant progress has been made in implementation of activities under this sub component with 43% of the farmers been linked to structured input and output markets. The following has been achieved in the sub component; i) Value chain selection (16 VCs at the national-level and 5 for each of the implementing counties), ii) Value Chain Development (VCD) strategies and investment plans for the priority value chains developed, a key milestone for the project, which identified the VC investment areas, policy reforms and created pipelines for opportunities for private capital mobilization. (iii) Building the capacity of the Ministry of Agriculture staff at the national and county Level VCD to equip them with the requisite skills for supporting the FPOs and SMEs on the development of bankable VC investments and VC upgrading; (iv) Twenty-seven (27) proposals of USD 5.3 Million have been approved under VC upgrading matching grant and USD 620, 371 disbursed.

18) Under market access infrastructure development (MAID), the project has mapped and completed prefeasibility of 36 physical markets/aggregation centres aligned with the priority value chains for upgrading. At mid-term, 9 proposals with complete designs had been approved by NTAC for development.

Sub-component 2.3: Data and Digital Investments

19) Implementation of Subcomponent 2.3 has accelerated digitalization across farmer institutions and expanded adoption of digital agriculture services. SACCO automation now covers 780 of 1,075 SACCOs, digitizing 388,862 member records and improving visibility in savings, lending, and governance functions, while 376 of 837 FPOs are fully digitized. A total of 739,560 farmers have accessed DAT-enabled climate-smart services: 190,636 through digital advisory, 299,577 through digital finance products, 105,873 through market-linkage tools, and 104,740 through production and input-related platforms. Agripreneur model remains central to last-mile extension, with 5,245 active agripreneurs updating 2.3 million KYF records and improving farmer profiling for targeted interventions.

20) The Kenya Agricultural Livestock Research Organization (KALRO) has advanced several digital enablers, including TIMPs validation, early uptake of the Big Data Platform, and rollout of soil-testing workflows. Approximately 1 million e-vouchers were issued and redeemed, with 5.8 million farmers linked to the fertilizer subsidy program. KALRO has also developed AI-powered solutions integrated across multiple digital platforms. These achievements reflect strong momentum across institutions and reinforce the potential for a unified digital agriculture ecosystem.

Sub-component 2.4: Research linkages, technical assistance, and institutional capacity

21) Significant progress has been made in achieving the project targets within the current funding. These include a) inventory of 350 TIMPs for the new value chains (pyrethrum, cotton and rice); b) updating of 1,122 TIMPs developed under KSCAP and NARIGP; c) classification of 387 TIMPs for climate smartness; d) digitization of TIMPs videos for use by the Agripreneurs; e) TIMPs training for Tier 1 and Tier 2; f) disseminated 532 TIMPs against a target of 1,600; g) sampled 7 counties out of the targeted 33 (the remaining counties will be done within the current funding, the data will be analyzed, digital maps developed to inform policy on fertilizer subsidy program and soil health management); h) sixteen (16) research-led demonstrations have been established at various KALRO centers; for demonstrating a wide range of TIMPs in crops and livestock. The established research led demos include mangoes (10 acres); cashew nut (12 acres); banana plantain 1.5 acres; Pyrethrum clonal nursery block (2 acres); Cotton (2 acres); Tomato (0.9 acres); forage grasses (Horsetail grass and Bush rye) (15 acres); and Coffee. Other demos include dairy and indigenous chicken multiplication. KALRO is yet to establish 21 more research-led demos.

22) Infrastructure support included a) refurbishment of training facilities, improvement of screen houses and repair of the Aeroponics, and construction of a Semi-Autotrophic Hydroponics ((SAH) facility at KALRO Tigoni for production of clean potato seed; b) construction of a post-harvest unit at KALRO Kandara for training in post-harvest; c) construction of a farmer and Training of Trainers (TOT) facility; supply and installation of assorted agricultural equipment and dairy equipment at Dairy Research Center Ol Joro Orok; erection of a drip irrigation infrastructure at Coffee Research Institute Ruiru for seedlings production; d) renovation and refurbishment of training facilities in KALRO Muguga; e) refurbishment of training facilities at KALRO Seed unit in Thika; f) construction of indigenous chicken houses at KALRO Katumani and KALRO Msabaha; f) Installation of poultry Abattour cold chain system at KALRO Naivasha; repair and renovation of Tissue Culture laboratory at KALRO Molo, in preparation for pyrethrum seedlings production; g) support to soil laboratory at KALRO Mtwapa through the operationalization of the Atomic Absorption Spectroscopy machine.

23) Infrastructural development and support in varietal release led to the success in the a) release of four (4) rice varieties for commercialization; b) six (6) rice varieties currently under National Performance Trials (NPT) by KEPHIS for breeder seed production; c) production of 12.2 tons of forage grasses (Horsetail grass and Bush rye) and availing to farmers; d) supply of 1.1M chicks; e) *Brachiaria* forage varieties award of White Label by Kenya Plant Health Inspectorate Service (KEPHIS; multiplication of basic seed is on-going) for commercial seed production.

Component 3: Climate Smart Safer Urban and Peri-urban Food Systems

24) This component experienced delays during the pilot's inception due to revisions to the implementation framework, which also disrupted the flow of funds to the implementation unit. Further piloting of the safe urban food systems needed to be aligned with the existing governance structures of devolution.

25) Nairobi County has, however, made significant progress in establishing project implementation structures through the formation of CPCU, CTAC, and CPSC, supported by comprehensive stakeholder sensitization and completion of the PICD process. The County identified five priority value chains and corresponding production clusters, mobilizing 5,778 farmers across 20 wards, forming 371 CIGs and 20 CDDCs. SACCO and SME mapping covered 1,825 of 3,049 institutions across 85 wards, strengthening market and financial linkages. Policy milestones include 70% completion of the Nairobi City County Urban Agriculture Policy and 80% of the Food Security Bill, 2025. Collaboration with Wageningen University and Global Alliance for Improved Nutrition (GAIN) produced a diagnostic analysis that guided prioritized food system pilot interventions, particularly in food safety and sustainable waste management, with NPCU assigning an officer to support implementation.

26) Mombasa County, which recently joined the project, is yet to sign the participation agreement or establish the necessary project structures, resulting in delays in implementation. Although three value chains, Leafy vegetables, poultry, and fish, have been prioritized under the Kenya marine Fisheries and Socio-Economic Development (KEMFSED) project, they need to be adapted for the NAVCDP climate-smart, safer urban and peri-urban food system. The linkages between peri-urban producers and urban markets remain weak, with limited progress in improving market access. Additionally, pilot initiatives focused on food safety and waste management have not been fully implemented, and there has been no reported progress in developing market infrastructure. Enhancing the scope of climate-smart, safer urban and peri-urban food systems is essential due to their significance throughout all Kenyan cities.

Component 4: Project Coordination and Management

Sub-component 4.1: Project coordination

- 27) The NAVCDP institutional framework is implemented at three levels; National, County, Intergovernmental and the Community. The roles as follows: policy and fiduciary oversight at the national level; Implementation and supervision at the county level; and Execution and accountability at the community level.
- 28) The project has established one National Project Steering Committee (NPSC) and 33 County Project Steering Committee (CPSC) that meet bi-annually to discuss policy and approval of Annual Workplan and Budgets. The National Technical Advisory Committees (NTAC) and County Technical Advisory Committees are the technical arm of the NPSC and CPSC respectively. The National Project Coordination Unit (NPCU) and County project Coordination Units (CPCUs). The NPCU and the 33 CPCU coordinate the implementation of day-to-day activities.
- 29) The Council of governors (CoG) and the Joint Agricultural Sector Steering Committee (JASSCOM) are coordinating institutions that have supported NAVCDP. The CoG mainly coordinates project activities across the counties and JASSCOM provides a framework for intergovernmental coordination. The Committee has been able to support the formulation and use of the digital platform (KIAMIS) to register farmers in the country through the use of digital tools to implement subsidy programs, facilitate smooth communications between the two levels of government (National & Counties) in the project and facilitated the development of Joint Projects frameworks and their operational instruments. At the community level, 1069 CDDCs support coordination of the project activities in CIGs/VMGs, FPOs and SACCOs.
- 30) Procurement under NAVCDP project is implemented at three levels; National, County and community. Procurement is carried out as guided by the World Bank procurement regulations. The project has developed a procurement manual which provide details and guides procurement officers on procurement procedures and thresholds. Currently over 150 contracts have been successfully completed and 50 others are signed and at various levels of completion. Project procurement faces multiple challenges which slow down procurement processes. Staff changes and delays in internal approvals affects the efficiency with which the implementation of activities is undertaken. Internal limitations, such as lack of or inadequate capacity building/training, or late disbursement / insufficient budget also affect the implementation of the project.
- 31) The Financial Management (FM) for the project has been endowed with resources from IDA and GoK for project implementation. The current disbursements stand at Euro 148.4 million (177.55 million USD) (66.5 %), with Euro 74.9 million (89.57 million USD) (33.5%) remaining undisbursed. The project has opened 34 Commercial Bank accounts at Counties and National levels, which has reduced time lag during IFMIS down time. A comprehensive framework is in place, including a FM Manual, an adaptable Community Grants Manual (CGM), and satisfactory arrangements with executing agencies like KALRO. There is continued preparation and reporting of quarterly Interim Financial Reports (IFR).

Sub-component 4.2: Communication, monitoring & evaluation (M&E), and information communication technology (ICT)

- 32) The role of monitoring and evaluation is fourfold; (i) Planning and budgeting, (ii) Monitoring and Evaluation and learning; (iii) Communication, and (iv) Environment and Social Safeguards.
- 33) Annual Work planning and Budgeting: The project's annual work planning and budgeting is conducted on an annual basis and describes the planned activities and expenditures for each financial year. The process is informed by detailed guidelines and a standard template for AWP&B at county and national levels. The AWP&B is comprised of: (i) Annual targets for key activities; (ii) Summary of planned expenditures by component and by implementing entity, and, (iii) Summary of expenditures in the current year. The project has prepared 3 guidelines and annual workplans and budgets (AWP&B), and reviewed 3 AWP&B to take into account budget supplementary.
- 34) Monitoring and Evaluation: The project has established a strong foundation for Monitoring, Evaluation, and Knowledge Management (ME&KM) system anchored on a digital reporting framework. The system comprises a database with digitized 2.3 million beneficiaries records successfully enabled to accurately identify farmers and monitor their linkage to FPOs and SACCOs. It also has Project management information system (PMIS) with global positioning system (GPS) coordinates for tracking project performance for efficient delivery of desired results. The Project PMIS serves as the central platform for quarterly and annual reporting across all implementing levels.
- 35) The PMIS currently tracks over 150 indicators, including over 30 high-level indicators and the rest as process indicators, aligned to the project's Results Framework. The PMIS currently also tracks one specific PDO indicator - number of farmers reached with agricultural goods and services. The PMIS is designed with specialized modules for FLID, FPOs, SACCOs, Agripreneurs, and Markets, and is also used for fiduciary reporting to support financial monitoring and accountability. The system builds on lessons from NARIGP, integrating web-based and geotagged reporting features to enhance transparency and traceability of project results.
- 36) Knowledge Management: The project currently lays emphasis on the generation and use of knowledge with a focus on strengthening the linkages and synergies between knowledge-intensive activities at the national, county and community levels, with the aim of transforming its knowledge resources into sustainable development results. By managing knowledge drawn from a wide range of experiences, successes and lessons learnt, the project therefore play an important role in shaping policy discussions on agriculture development, while achieving its development objective.

- 37) The project has developed databases, publications, audio visuals, and the website to ensure that knowledge remains accessible and relevant. Through leveraging on technology, NAVCDP has built platforms and integrated into knowledge management platforms available at national and county levels to both store and disseminate knowledge generated in the project. The platforms include; The NAVCDP MIS; The NAVCDP website; Big Data Platform; Beneficiary database
- 38) Communication: The Communication sub-component has been effectively supporting project visibility, documenting project activities (videos, short videos and articles), and stakeholder engagement since inception. Achievements include the development of the Communication Strategy (2024), production of communication materials, and initial knowledge-sharing across counties. However, limited county-level documentation capacity and the absence of a centralized knowledge repository have constrained learning and dissemination. Communication activities have mainly focused on project and visibility at both the national and county level. Through the additional financing the project will now focus on shared learnings, documenting and disseminating through print and online media, key success stories and case studies.
- 39) Environmental and Social Safeguards: NAVCDP is aligned to the World Bank Environment and Social Framework (ESF) and the National legislations namely; EMCA 1999 (Amendment 2025) and the Agricultural Sector Transformation and Growth Strategy (ASTGS 2019-2029). In compliance with the World Bank and the GoK Environmental and Social Safeguards requirements, the following framework documents were prepared and disclosed in a manner satisfactory to the World Bank: (a) Environmental and Social Commitment Plan (ESCP), (b) Stakeholder Engagement Plan (SEP), (c) Environmental and Social Management Framework (ESMF) with an Annex of the Integrated Pest Management Framework (IPMF), GBV/SEAH Prevention and Response Action Plan, and the Security Management plan (SMP). Other instruments include the Labour Management Procedures (LMP), Resettlement Policy Framework (RPF), the Vulnerable and Marginalized Groups Framework (VMGF) and the Grievance Mechanism.
- 40) These frameworks provide mechanisms for: (i) identifying and assessing potential adverse environmental and social impacts based on the types of activities planned; and (ii) proposing screening methods and processes to assess and design appropriate mitigation measures for the identified investments, including determining the type and kind of Environment and Social Safeguards instrument for managing the associated risks and impacts.
- 41) NAVCDP covers 34 counties with different, Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS 6), Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (ESS 7); Conservation of Cultural heritage amongst different communities (ESS 8).

42) The project continues to enhance capacities of all the PAPs and stakeholders, including implementing agencies, county governments, SPs, PoEs, and beneficiary communities (men, women, youth and VMGs) through; social awareness and capacity building, ensuring participation of women, VMGs, and youth in decision-making, community projects, and FPOs; designing and implementing special programs targeting vulnerable women, VMGs (Indigenous Peoples), and youth to address constraints to participating in local development agendas; and ensuring accountability for gender mainstreaming and social inclusion, including the collection and reporting of gender-disaggregated data.

I.4 Project Design

43) To ensure inclusivity and operational depth, NAVCDP is organized around four key support areas, each with specific investments and institutional arrangements.

i. Supporting farmer-level Investments

- Saturation approach covering all administrative wards in participating counties.
- Farmers select up to five value chains: four from the national menu of sixteen priority value chains (for example, dairy, chicken, coffee, cotton, pyrethrum, banana, avocado Apiculture) and one county-specific choice.
- FPOs funded directly through three grant windows: Inclusion, Enterprise Development, and Value Chain Upgrading Matching Grants.
- CIGs access revolving credit through ward-based SACCOs.
- All farmers registered under the Participatory Integrated Community Development (PICD) process, with mobilization at ward and group levels.
- Community-Driven Development Committees (CDDCs) support CIGs and Vulnerable and Marginalized Groups (VMGs) with inputs and demonstrations using the Farmer Field & Business School (FFBS) model.
- Each ward has a SACCO, either newly mobilized or strengthened based on diagnostic surveys.
- Farmer registration, SACCO membership, and fund access are value chain-neutral, ensuring inclusivity across commodities.

ii. Supporting county value chain development

- Ecosystem investments for landscape-wide natural resource management.
- Development of irrigation, processing, and market infrastructure.
- Bundled services to smallholder farmers, including extension, inputs, and credit.
- Capacity building through community-based digital extension and micro-investments for climate-smart technologies.

iii. Implementing safer urban food systems (Nairobi and Mombasa)

- Direct linkage of rural producers to urban consumers.
- Connecting FPOs to commercial entities and promoting urban farming.
- Farmer-consumer market linkages with end-to-end traceability.
- Food safety interventions and operationalization of farmer markets.

- iv. Supporting national policy reforms and capacity development
 - Strengthening the enabling environment for e-voucher and Disruptive Agricultural Technologies (DAT).
 - Partnerships with technical support agencies.
 - Incubation and training of women and youth as agripreneurs to deliver bundled services (inputs, extension, credit, market linkages).
 - Agripreneurs earn incomes through transaction charges, creating meaningful rural jobs.

I.5 Contribution of AF to NAVCDP

- 44) The US\$250 million AF will enable NAVCDP to successfully scale from 26 to 34 counties and 520 to 1,075 wards, reaching 2.3 million farmers across 19 prioritized value chains, including urban food systems in Nairobi and Mombasa. It will strengthen farmer services, institutional capacity, market linkages, and digital platforms, while promoting inclusive participation of women, youth, and vulnerable groups and climate-smart practices. The AF positions NAVCDP as a national flagship program, advancing Kenya's agricultural commercialization, resilience, and food security objectives.
- 45) The AF is fully aligned with Kenya's Agricultural Sector Transformation and Growth Strategy (ASTGS, 2019 -2029), Kenya Vision 2030, and the Bottom-Up Economic Transformation Agenda (BETA), as well as regional and global commitments including the African Union Agenda 2063, the Comprehensive Africa Agriculture Development Programme (CAADP), and the United Nations Sustainable Development Goals (SDGs).

Additional Financing Allocation, Activities and Resources by Component

- 46) The AF allocation of resources by component and the corresponding proposed activities is summarized below.

Component I - Building Producer Capacity for Climate Resilient Stronger Value Chains: US\$100 million AF, total US\$235 million

- i. Strengthen community institutions (FPOs, SACCOs, CDDCs, IWUAs) through governance training and standardized manuals.
- ii. Train 180,000 lead farmers, 7,525 agripreneurs, 10,750 FPO agents, and 3,500 community disease reporters under the FFBS approach.
- iii. Establish 5,375 farmer-led demonstrations across 33 counties.
- iv. Finance animal vaccination campaigns (FMD, PPR), genetic improvement, and modernization of coffee factories.
- v. Support SACCO unionization, revolving funds for FPOs and FLID farmers, and build cooperative leadership capacity.

Component 2 - Climate Smart Value Chain Ecosystem Investments: US\$100 million AF, total US\$180 million.

- i. Construct 244,000 farm ponds (10,000 ha) and rehabilitate 1,800 ha of irrigation schemes.
- ii. Implement soil and water conservation measures over 28,000 Ha.
- iii. Develop value chain strategies for tea, maize, and edible oils; crowd in private sector investments.
- iv. Upgrade market infrastructure with SPS compliance, e-commerce platforms, commodity exchange, and livestock facilities.
- v. Revitalize coffee VC in 16 counties (milling, warehousing, trading platform, marketing).
- vi. Digitize 1,800 SACCOs/FPOs, strengthen KADIC as national data hub, scale Agripreneur Model, and foster AgTech partnerships.
- vii. Invest in KALRO infrastructure, seed systems, soil fertility mapping, and research demos for priority crops and livestock.

Component 3 - Climate Smart Safer Urban Food Systems: US\$25 million AF, total US\$30 million.

- i. Establish food safety management systems in Nairobi and Mombasa.
- ii. Link peri-urban producers to processors/logistics; support SMEs with training and finance.
- iii. Upgrade urban market infrastructure, cold chains, and slaughter facilities.
- iv. Promote e-commerce platforms and solid waste management (composting, Black Soldier Fly farming).
- v. Train stakeholders in food safety, SOPs, and waste management.

Component 4 - Project Coordination and Management: US\$25 million AF, total US\$55 million.

- i. Strengthen CPCUs and NTAC oversight.
- ii. Enhance M&E systems, digital reporting, and grievance redress.
- iii. Build institutional capacity for environmental and social safeguards compliance and financial management.

Component 5 - Contingent Emergency Response (CERC): This component remains unallocated, serving as a zero-cost crisis response window.

- i. Activities triggered only in case of eligible emergencies, allowing rapid reallocation of funds to safeguard farmer livelihoods and food systems.

47) If awarded, the AF will expand the NAVCDP financing envelope to US\$525 million. This increase will consolidate ongoing gains and scale interventions across farmer-level investments, county value chain development, urban food systems, and national policy reforms, thereby reinforcing resilience, inclusivity, and sustainability within Kenya's agricultural transformation agenda.

Expected AF Results (2025 - 2027)

48) Key outcomes anticipated from the AF between 2025 and 2027 include:

- i. Expanded farmer coverage: Consolidate support for 2.3 million farmers and extend outreach to additional households across 34 counties.
- ii. Sustainable land management: Rehabilitate at least 28,000 hectares under climate-smart practices, scaling watershed interventions and farmer-led irrigation.
- iii. Digital agriculture services: Increase adoption of e-voucher and DAT platforms, with over 739,560 farmers accessing bundled services.
- iv. Institutional strengthening: Operationalize and automate 1,039 SACCOs and mobilize 837 FPOs to deliver collective marketing and improved access to credit.
- v. Urban food systems: Establish and operationalize UFSs in Nairobi and Mombasa, focusing on food safety, traceability, and commercial urban farming linked to rural producers.

I.6 Stakeholder Engagement Context

49) This updated Stakeholder Engagement Plan (SEP) defines and guides the approach to consultations under the NAVCDP and its AF. The scope reflects the expanded saturation model across 34 counties, and the ongoing impact on diverse stakeholders. The SEP provides strategies and mechanisms for addressing the concerns of stakeholders who are affected by or have an interest in the project, ensuring that engagement remains purposeful, structured, and culturally appropriate.

50) The overarching goal is to sustain a programme of stakeholder engagement that supports NAVCDP implementation and achievement of its objectives, while incorporating the specificities of the AF. At mid-term, the SEP continues to serve as a platform for productive interaction with project-affected people and other interested parties, promoting transparency, accountability, and inclusivity

51) Social inclusion is key to the engagement process. NAVCDP actively identifies and involves VMGs, women, and youth who might otherwise be excluded. Tailored approaches are being applied, for example, women are consulted in separate groups facilitated by female extension agents, while VMGs are engaged through culturally appropriate channels. These measures ensure that consultations are not only representative but also responsive to the needs of groups that face barriers to participation.

52) Engagement combines digital platforms such as the Kenya Integrated Agricultural Management Information System (KIAMIS), Know Your Farmers (KYF) registry, and DAT services with traditional forums including ward-level barazas, district workshops, and focus group discussions (FGDs). This blended approach ensures accessibility for farmers with limited digital reach while maintaining efficiency and transparency.

I.7 Legal Requirements for Stakeholder Engagement

53) NAVCDP Stakeholder engagement is anchored in both Kenya's national legal framework and the World Bank's Environmental and Social Framework (ESF). These frameworks establish binding obligations that make participation, transparency, and accountability central to project delivery.

National Legal Framework

- i. Constitution of Kenya, 2010 (Articles 10 & 118): Public participation is a national value and principle of governance. All development projects must involve citizens in decision-making.
- ii. Environmental Management and Coordination Act (EMCA, 1999; Amendment 2015): Requires public consultation and disclosure during environmental and social impact assessments.
- iii. County Governments Act, 2012 (Sections 87 - 91): Mandates citizen participation in county planning and development processes.
- iv. Access to Information Act, 2016: Guarantees the right of stakeholders to timely and accessible information on government projects.

World Bank ESF Environmental and Social Standard (ESS)10 - Stakeholder Engagement and Information Disclosure

ESS 10 requires borrowers to:

- i. Identify and analyze stakeholders and maintain constructive relationships.
- ii. Assess stakeholder interests and incorporate their views into project design.
- iii. Provide inclusive engagement throughout the project life cycle.
- iv. Disclose project information on risks, impacts, and benefits in a timely and understandable manner.
- v. Prepare and implement a Stakeholder Engagement Plan (SEP) proportionate to the project's scale and risks.
- vi. Maintain and disclose a documented record of consultations.

54) To ensure inclusivity, transparency, and accountability across all levels of implementation, NAVCDP Stakeholder engagement is anchored in a three-tier structure:

- i. Tier I- National level: The National Project Coordination Unit (NPCU), National Project Steering Committee (NPSC), and National Technical Advisory Committee

(NTAC) provide policy direction, technical oversight, and alignment with national strategies such as the ASTGS (2019 - 2029), the BETA, and the AgriConnect Compact.

- ii. Tier 2 - County level: County Project Coordination Units (CPCUs), County Project Steering Committees (CPSCs), and County Technical Advisory Committees (CTACs) anchor implementation within devolved governance structures, ensuring integration with County Integrated Development Plans (CIDPs) and sector priorities.
- iii. Tier 3- Community level: CDDCs, CIGs, VMGs, FPOs, SACCOs, and Irrigation Water Users' Associations (IWUAs) serve as the primary platforms for farmer mobilization, extension services, and grievance redress.

55) Engagement processes are deliberately inclusive, ensuring equitable participation of women, youth, and VMGs through tailored approaches such as women-led SACCOs, youth agripreneur cohorts, and VMG-specific grievance channels. Mechanisms combine digital platforms, including the KIAMIS, Know Your Farmers (KYF) registry, and DAT services, with traditional forums such as ward-level barazas, district workshops, and focus group discussions to guarantee accessibility for farmers with limited digital reach.

56) Beyond farmer institutions, the SEP incorporates traditional leaders, civil society organizations, private sector actors, and county assemblies to broaden ownership and legitimacy. Continuous feedback loops are embedded through county dashboards and national monitoring systems, with quarterly reviews ensuring that engagement outcomes inform adaptive management. This integrated approach positions stakeholder engagement as a driver for resilient, inclusive and sustainable agricultural transformation.

1.8 Stakeholder Identification and Analysis

Identification of Stakeholders

57) The NAVCDP stakeholder engagement process has involved systematic identification, mapping, and analysis of relevant actors across national, county and community levels. At mid-term, this SEP clarifies the stakeholder identification procedure and continues to guide NAVCDP in meeting national and county commitments.

58) Stakeholders have been identified using criteria that take account of site-specific conditions:

- i. Liability: Project implementation or on-going operations may result in legal, financial, or other liabilities of the proponent to a social group.
- ii. Influence: A social group may be able to substantially influence project implementation or ongoing operations;

- iii. Partnership: Opportunities exist for building collaborative relations between the project and a given social group.
- iv. Dependency: Project implementation may significantly affect a given social group whose livelihoods depend on ongoing operations.
- v. Representation: A social group may have a right to represent interests about the project legitimated through legislation, custom, and or cultural practice.
- vi. Expressed interest: A social group or individual may express interest in the project, or ongoing operations, and this group is not necessarily directly affected by the planned or current activities.

59) Cooperation and negotiation with the Project stakeholders throughout the project development has entailed the identification of persons within the CIGs/VMGs or POs who act as legitimate representatives of their respective stakeholder farmer groups. These individuals elected or entrusted by peers, have carried responsibility of advocating for groups interests during engagement with the project.

60) Community representatives, particularly in multi-community investments, have provided helpful valuable insights into local settings and acted as conduits for disseminating project-related information. Their legitimacy stems from both formal election and informal recognition within communities, enabling them to serve as focal points of contact. Examples of legitimate representatives include:

- i. Elected officials at county and ward levels, and self-governance bodies.
- ii. Administrative officials such as chiefs and assistant chiefs;
- iii. Non-elected leaders widely recognized within their community (e.g. chairpersons of local cooperatives or initiative groups, etc.).
- iv. Leaders of community-based organizations, local NGOs, women and youth groups.
- v. Elders, veterans, religious leaders, teachers, and other respected persons.

Stakeholder Analysis

61) For effective and tailored engagement, NAVCDP stakeholders and subprojects have been defined under the following categories.

- i. Project Affected Persons (PAPs)/Households (PAHs): Individuals, VMGs, CIGs, FPOs, and POs and other entities within the project Area of Influence (PAI) who are directly affected (positively or negatively) and who require close engagement in identifying impacts, assessing significance, and participating in decisions on mitigation and management measures.

- ii. Other Interested Parties (OIP) - Line ministries, departments, CSOs, development partners, and other entities who may not experience direct impacts but perceive their interests as affected, or who could influence project implementation.
- iii. Vulnerable Groups - Persons disproportionately impacted or disadvantaged compared to other groups, requiring special engagement efforts to ensure equal representation. These include women, persons with disabilities (PWDs), youth, female- and child-headed households, squatters, and elderly persons.

62) Continuous engagement with all identified stakeholders has helped to secure contributions toward successful implementation of subprojects, drawing on their expertise, networks, and agendas. This process has facilitated both community and institutional endorsement of project activities and has enabled access to local knowledge and experience through active involvement.

I.9 Project Components and Stakeholder Engagement Areas

63) A description of stakeholders and their needs is summarized in Table I.

Table I: Summary of Project Stakeholder Needs

Category	Stakeholder Group	Estimated Membership	Language Needs	Preferred Notification Means	Specific Needs (Accessibility)
NPSC	Permanent Secretaries - Agriculture, Livestock, Fisheries and Cooperatives, Sector ministries, Non-State Actors	About 7-9 members	English / Kiswahili	Letters, Phone calls, emails, WhatsApp	Daytime meetings
NTAC	Sector Directors, Non-State Actors	About 15 members	English / Kiswahili	Letters, Phone calls, emails, WhatsApp	Daytime meetings
NPCU	Designated Experts	13-14 Specialists	English / Kiswahili	Letters, Phone calls, emails	Daytime meetings
Thematic Groups	Panel of Experts (PoEs)	Thematic areas/experts based on the nine value chains	English / Kiswahili	Letters, Phone calls, emails, WhatsApp	Daytime meetings
CPSC	Sector CECs, NGOs,	7-11 persons	English / Kiswahili	Letters, Phone calls, emails, WhatsApp	Daytime meetings

Category	Stakeholder Group	Estimated Membership	Language Needs	Preferred Notification Means	Specific Needs (Accessibility)
CTAC	Sector County Directors, Non-State Actors, Reps of special groups	11-15 experts	English / Kiswahili	Letters, Phone calls, SMS, emails, WhatsApp	Daytime meetings
CIGs	Registered farmers / Pastoralists	Numerous	English/Kiswahili/local language	Letters, Phone calls, emails, radio, SMS	Daytime meetings
VMGs	Registered VMG farmers / pastoralists	Numerous	Kiswahili/local language	Letters, Phone calls, emails, radio, public meetings, group discussions, SMS	Daytime meetings, entry point Council of Elders
POs	Registered and practicing members	Numerous	English /Kiswahili/ local language	Letters, Phone calls, emails, radio, SMS, WhatsApp	Daytime meetings
Multi-community Investment Committees	Elected officials by the community; community members	Numerous	English/ Kiswahili/ local language	Letters, Phone calls, emails, radio	Community barazas through Area Chiefs
Value chain Apex Organizations	Representatives	Numerous	English/ Kiswahili	Letters, Phone calls, emails, SMS, WhatsApp	Daytime meetings
Industry	Players along the relevant value chains	Numerous	English/ Kiswahili	Letters, Phone calls, emails,	Daytime meetings
Agro-input stockists	Players	Numerous	English/ Kiswahili	Letters, Phone calls, emails, SMS	Daytime meetings

64) Project investments under NAVCDP are implemented at multiple levels, including farmers and community institutions (CIGs, VMGs, CDDCs), producer organizations (FPOs and SACCOs), county governments, and national institutions. Across each project component, Table 2 below summarizes both ongoing activities and proposed Additional Financing-supported interventions required to operationalize the expanded project scope.

Table 2: NAVCDP Components, Ongoing Activities, and, Proposed AF Interventions

I	Component I: Building Producer Capacity for Climate Resilient Stronger Value Chains	Recommended Additional Tasks
I.1	<i>Sub-component I.1 Farmer Capacity Building and e-Voucher Support</i>	
	<ul style="list-style-type: none"> ● Capacity needs for CIGs/VMGs; CDDCs, FPOs, and SACCOs have been identified; ● Community mobilization and strengthening through CDDCs for demos on climate smart TIMPs for prioritized value chains. and value chain promotion mainly for VMGs -CIGs; and new CIGs and IPs-CIGs have been conducted. ● Farmers have been mobilized to access GoK funded NVSP input climate smart e-subsidy support (seeds, fertilizer, and agro-chemicals) ● Small scale infrastructure investments for primary aggregation and value addition have been initiated. ● Technical Assistance at National and County levels has been provided.to support implementation 	<ul style="list-style-type: none"> ● Continue Supporting strengthening of community institutions ● Support TIMPs trainings at tier 3 (lead farmers, farmer producer agents, Agripreneurs, Community Disease Reporters) who will train farmers in tier 4 using the Farmer Field and Business Schools (FFBS) approach to deepen and upscale extension services
I.2	<i>Sub-component I.2 FPO Level Climate Smart Value Chain Investments</i>	
	<ul style="list-style-type: none"> ● Participatory identification of capacity needs for FPOs and provision of inclusion grants for the mobilization and strengthening of FPOs ● Development of climate informed business plans to enable access high quality climate resilient inputs, balanced fertilizers, aggregation and value addition ● Technical assistance to support access to formal financing; enable linkages with agribusiness SMEs, e-commerce companies and large ag-tech startups; and build techno-managerial capacity for agribusiness operations 	<ul style="list-style-type: none"> ● Support the: deepening and upscaling of new value chain investments, including; prioritized GOK initiative in animal vaccination to facilitate local and international market access such as the East African Community, European Union (EU), and the Gulf Cooperation Council (GCC); ● Support genetic conservation and management, assisted reproductive technologies for improved genetic merits for improved production and productivity; Modernization of coffee factories
I.3	<i>Sub-component I.3 Improve Creditworthiness of CIGs and FPOs</i>	

	<ul style="list-style-type: none"> ● Provide initial small grants to CIGs through Savings and Credit Cooperatives (SACCOs) that will be repaid to build a revolving fund ● Enhance financial management of VMG-CIGs, IPs-CIGs, CIGs/SACCO/CDDCs ● Technical assistance to FPOs to access finance and support development of FPO rating tool ● Build county, regional and national level partnerships for FPOs to ensure credit linkages and long-term access to capital from commercial banks, SACCOs, micro-finance institutions and digital financial service providers. 	<ul style="list-style-type: none"> ● Support the unionization and federation of primary ward based SACCOs to Agriculture Secondary Cooperatives (SACCO Unions) across the 34 counties ● Support for the establishment and operationalization of agricultural SACCO Union ● Additional grant to fund through Public/Private Partnership
2	Component 2: Climate Smart Value Chain Ecosystem Investments	Recommended Additional Tasks
2.1	<i>Sub-component 2.1 Farmer-led Irrigation Development</i>	
	<ul style="list-style-type: none"> ● Leverage on CIGs/FPOs to motivate farmers access irrigation and use water efficiently. ● Leverage on CIGs/FPOs to develop irrigation centred FLID forums linking farmers with irrigation suppliers, financial institutions and other key stakeholders. ● Deployment of technical resource persons to coordinate with County Irrigation Development Units (CIDU) for provision of technical support on water harvesting and accessing irrigation through aggregation and linkage of farmers to high-tech suppliers and financial institutions 	<ul style="list-style-type: none"> ● Scale up FLID interventions to expand irrigation coverage, strengthen institutions, and promote sustainable land management ● Support soil and water conservation measures under SLM to realize enhanced productivity and integrated management of watersheds.
2.2	<i>Sub-component 2.2 Market Access and Infrastructural Development</i>	
	<ul style="list-style-type: none"> ● Formulate value chain development plans and co-financing models to maximize finance and crowding of investments at County, regional and national levels. ● Development and upgrading of physical markets, aggregation centres and cold chain infrastructure. 	<ul style="list-style-type: none"> ● Rename 'Value chain Development and Market Access' from Market Access and infrastructure development ● Support value assessments and analytics and development of VCD strategies and investment plans for the additional

	<ul style="list-style-type: none"> Develop linkages with anchor off-takers and create pipeline investable opportunities for development of market infrastructure with private sector players. Strengthen Kenya Markets Information Systems (KAMIS) to bridge market information asymmetry. Finance new and existing SMEs that provide essential services along the value chains 	<p>priority Value Chains (tea, maize, Edible Oils, wheat and Macadamia).</p> <ul style="list-style-type: none"> Adopt the One Health approach to investments in market infrastructures that focus on Sanitary and Phytosanitary Standards (SPS).
2.3	<i>Sub-component 2.3 Data and Digital Investments</i>	
	<ul style="list-style-type: none"> Scale up partnership with DAT service providers by mobilizing technical assistance, training/capacity building and digital equipment Strengthen existing Big Data platform at KALRO to support wider farmer outreach Develop women and youth agripreneurs as last mile extension service providers and human touch point for bundling services in partnership with DAT providers Training and capacity building for county staff and farmers. 	<ul style="list-style-type: none"> Establishment of the KADIC as the national anchor for agricultural data and information management Strengthen AP model, the project will strengthen and scale the Agripreneur Model Deepen and promote digital literacy among community institutions and farmers Strengthening KALRO's Big Data Infrastructure is central to advancing its research Deepening data Collection, integration and ingestion
2.4	<i>Sub-component 2.4 Research Linkages, Technical Assistance and Institutional Capacity</i>	
	<ul style="list-style-type: none"> Develop an inventory of TIMPs for the three new value chains (cotton, pyrethrum, and cashew nuts) Update inventories of TIMPs for other value chains developed under NARIGP/KCSAP and prioritize 3-5 TIMPs with highest potential for impact. Support on-boarding of Technical Support Agencies across several functional areas 	<ul style="list-style-type: none"> Finance technical capacity building and infrastructure development for KADIC, KSA, Livestock Training Institutes and KALRO

	<ul style="list-style-type: none"> • Support deployment of full-time dedicated human resource and required equipment to support their functioning at County level • Establish dedicated cell at County level to anchor investment coordination and reference database of ongoing county level investments for prospective new investors 	
3	Component 3: Piloting Climate Smart Safer Urban Food Systems	Recommended Additional Tasks
3.1	<i>Sub-component 3.1 Climate Smart Urban and Peri-urban Agriculture</i>	
	<ul style="list-style-type: none"> • Mobilizing and organizing urban and peri-urban farmers into CIGs/VMGs and FPOs and provide micro-project investment support to promote appropriate TIMPs • Linkage with DAT service providers for efficient input use • Link urban/peri-urban zones to mid-stream value chain stakeholders such as processors, logistic providers, and quality control and assurance institutions i.e. KEBS • Train and link SMEs in urban/peri-urban production and marketing to financial service providers 	<ul style="list-style-type: none"> • Inclusion of the Mombasa cluster (Mombasa, Kwale and Kilifi) and deepening of project activities in the Nairobi cluster
3.2	<i>Sub-component 3.2 Urban Infrastructure</i>	
	<ul style="list-style-type: none"> • Develop climate proof market infrastructure to serve market hubs for direct farmer-consumer linkages • Facilitate between CIGs/VMGs and FPOs and e-commerce platforms and digital aggregators • Support intensive consumer awareness and information campaign to catalyze higher demand and value for safer food produce. 	<ul style="list-style-type: none"> • Strengthen market connections between rural/peri-urban producers and urban consumers through climate-resilient infrastructure upgrades and cold chain for urban and peri-urban markets and slaughter facilities meat distribution centers
3.3	<i>Sub-component 3.3 Policy and Institutional Strengthening</i>	
	<ul style="list-style-type: none"> • Implementation of existing legal and regulatory frameworks such as the Nairobi City Council Food System Strategy 	<ul style="list-style-type: none"> • Align the county legal frameworks to the National law which is currently at its final stages.

	<ul style="list-style-type: none"> Strengthening the coordination and convergence of line ministries and departments and agencies involved in urban food systems at National and County levels Training and capacity building for consumers, farmers and government line ministries and departments Support policy analytics and technical assistance to line ministries and departments 	<ul style="list-style-type: none"> The sub-component will support its finalization and operationalization.
4	Component 4: Project Coordination and Management	Recommended Additional Tasks
4.1	<i>Sub-component 4.1 Project Coordination</i>	
	<ul style="list-style-type: none"> Finance costs of NPCU that include salaries, operation and maintenance costs, project supervision and oversight Support oversight and inter-governmental coordination provided by the Joint Agriculture Sector Steering Mechanism (JASSCOM), Council of Governors (CoG and Caucus of County Executive Committee Members (CECMs) Support the Agriculture Transformation Office 	<ul style="list-style-type: none"> NPC and CPSs be allowed to sign professional opinion and contract up to a specified threshold Strengthened internal capabilities (human resource) by recruiting or onboarding a procurement assistants/specialist both at National and at the county levels.
4.2	<i>Sub-component 4.2 Communication, Monitoring and Evaluation (M&E), Environmental and Social Safeguards, and Information Communication Technology</i>	
	<ul style="list-style-type: none"> Finance activities related to communication with all stakeholders that are part of project implementation Support engagement with farming communities to ensure participation and ownership at planning, preparation and implementation of community driven development operations Finance routine M&E functions including baseline, mid-point and end of project evaluations Support project investments to identify potential risks and impacts, capacity build stakeholders and beneficiaries, and devise suitable 	<ul style="list-style-type: none"> Expand project scope in annual work plan budgets to additional 7 counties, 555 more wards and addition of extra additional 8 VCs in the the project area. Develop knowledge management portal especially at the county levels to capture, process, store, retrieve and share Knowledge Formulation and review of agricultural policies Formulation and review of agricultural laws and regulations to modernize Kenya's agriculture sector

	mitigation measures with a view to achieving project compliance. Facilitate networking across project components and support development of an ICT-based agricultural information platform for sharing information	<ul style="list-style-type: none"> • Support for agricultural institutions' capacity building
5	Component 5 Contingency Emergency Response Component	Recommended Additional Tasks
	Finance immediate response activities following natural disasters impacting the agricultural sector triggered upon formal request from the National Treasury on behalf of GoK	

1.10 NAVCDP Screening and Compliance Procedures

65) The project continues to comply with nine of the ten ESSs. This SEP has been updated to reflect the expanded project scope, geographic coverage, and new NAVCDP investments and related activities. The updated SEP supports the application of the following environmental and social screening and compliance instruments:

Environmental and Social Impact Assessments /Environmental and Social Management Plans

66) All NAVCDP subprojects undergo preliminary environmental and social screening using the ESS screening checklist provided in the ESMF. Most subprojects are addressed through Summary Project Reports (SPRs), which inform the identification of potential risks and impacts, the selection of appropriate mitigation measures, and the determination of whether further site-specific environmental and social assessments are required. The updated SEP guides stakeholder engagement throughout the screening, disclosure, and implementation stages.

Exclusion list

67) The following types of activities are ineligible for financing under the project:

- i. Activities that have a high probability of causing serious adverse effects to human health and/or the environment.
- ii. Activities that may adversely affect lands or rights of Traditional Local Communities or other vulnerable and marginalized groups.
- iii. Associated facilities which do not meet the requirements of the ESSs, to the extent that the beneficiaries have control or influence over such associated facilities.
- iv. Activities that may have significant adverse social impacts and/ or may give rise to significant social or community conflict.
- v. sub-project/ activity with either adverse impacts on land or natural resources under traditional/customary use or have risks associated with the relocation of VMGs coupled with any negative impact on their cultural sites/heritage.
- vi. Activities that may involve involuntary resettlement or land acquisition (physical relocation of PAPs).
- vii. Investment on land for which clear ownership document is not available.
- viii. Activities that may involve economic displacement of more than 200 PAPs.
- ix. Activities that may affect or result in impacts on cultural heritage.
- x. Activities that require resettlement and land acquisition.

Resettlement Policy Framework

68) While NAVCDP is designed to avoid involuntary land acquisition and displacement, some subprojects under the AF may require temporary or permanent use of land currently occupied or utilized by other persons, potentially resulting in physical and/or economic displacement. In such cases, enhanced and continuous stakeholder engagement is required, and site-specific Resettlement Action Plans (RAPs) or

Relocation Plans will be prepared in accordance with the RPF. The updated SEP strengthens consultation, disclosure, and grievance handling processes associated with resettlement-related risks during the AF period.

Vulnerable and Marginalized Groups Framework

69) NAVCDP implementation includes counties that may host communities meeting the criteria of ESS7 (Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities). During the AF period, targeted social inclusion measures will continue to be applied to ensure these communities benefit equitably from project interventions. The updated SEP, in conjunction with the VMGF, outline culturally appropriate consultation processes, participation mechanisms, and benefit-sharing arrangements for these communities.

Grievance Mechanism

70) NAVCDP has an operational Grievance Mechanism, including the Project-level GM, the Labour Management Procedures (LMP) GM, and a dedicated GBV/SEAH GM. These mechanisms provide accessible channels for grievance intake, handling, reporting, survivor-centred response, post-counselling support, and referrals to appropriate service providers. The updated SEP places emphasis on awareness-raising, accessibility, confidentiality, and timely resolution of grievances, particularly in newly included counties and urban food system interventions.

Table 3 presents the environmental and social safeguards instruments that may be required for each implementation level.

Table 3: Environmental and Social documentation for NAVCDP

Document	National level	County level	MCI level	PO level	FFS/CIG/ Farmer level	Farmer Federation level
ESMF**	X	X				
IPMP**	X	X	X	X	X	X
ESS screening checklist	X	X	X	X	X	X
ESIAs/SPR		X	X	X		X
ESIAs/CPR			X	X		X
ESMP		X	X	X	X	X
C-ESMP		X	X	X		
EPRP			X	X	X	X
WMP			X	X		X
EHS/OHS	X	X	X	X	X	X

Document	National level	County level	MCI level	PO level	FFS/CIG/ Farmer level	Farmer Federation level
LMP			X	X		X
SMP	X	X	X	X	X	X
VMGF**	X	X				
VMGP**				X	X	X
RPF**	X	X				
RAP / ARAP			X	X		X
Incident /Accident Register			X	X	X	X
SEAH Action Plan	X	X	X	X	X	X
Child protection Strategy			X	X		
SEP	X	X	X	X	X	X
GMC	X	X	X	X	X	X

Note:

C-ESMP: Contractor's ESMP

CPR: Comprehensive Project Report

EHS: Environmental Health and Safety

EPRP: Emergence Preparedness Response Plan

ESIA: Environmental & Social Impact Assessment

ESMF: Environmental and Social Management Framework

ESS: Environmental and Social Standards

GMC: Grievance Redress Mechanism Committee

SEAH Action Plan: Sexual Exploitation Abuse/Harassment Prevention and Response Plan

IPMP: Integrated Pest Management Plan

LMP: Labour Management Procedures

OSH: Occupational Safety and Health

RAP or ARAP: Resettlement Action Plan / Abbreviated Resettlement Action Plan

RPF: Resettlement Policy Framework

SEP: Stakeholder Engagement Plan

SMP: Security Management Plans

SPR: Summary Project Reports

VMGF: Vulnerable and Marginalized Groups Framework

VMGP: Vulnerable and Marginalized Groups Plan

WMP: Waste Management Plan

*** Separate specialized E&S document to be prepared to meet ESF and other applicable requirements; * identifies present documentation.*

I.11 Summary of Potential Environmental and Social Impacts/Risks

- 71) At appraisal, the Environmental and Social Review Summary (ESRS, 2022) classified NAVCDP as having substantial environmental and social risk. Key risks identified included climate change vulnerability, post-harvest losses, exclusion of vulnerable groups, risks related to SEA/SH and GBV, and gaps in institutional capacity.
- 72) Table 4 summarizes these environmental and social risks and is used to guide monitoring, stakeholder engagement, and safeguards compliance. The table reflects both risks identified at appraisal and findings from mid-term review, including new risks associated with the AF (expanded scope). It will be updated regularly in line with ESRS requirements and ESS10 to reflect changing project conditions, mitigation measures, and stakeholder feedback. Updates and monitoring results will be shared with stakeholders through county barazas, project websites, and periodic reports to promote transparency, accountability, and inclusive participation.

Table 4: Potential Environmental and Social Risks/Impacts and Mitigation Measures

Category	Specific Risks / Impacts	Mitigation Measures	Monitoring Indicators
Environmental	Climate change vulnerability (erratic rainfall, rising temperatures, drought/flood risks)	Promote climate-smart TIMPs, farmer-led irrigation, soil and water conservation	# of TIMPs adopted; # of hectares under climate-smart practices
	Post-harvest losses and inefficient value chains	Invest in aggregation centers, cold storage, market infrastructure	% reduction in post-harvest losses; # of facilities operational
	Potential impacts from irrigation and infrastructure development	Environmental screening, ESMPs, water use efficiency measures	# of ESMPs prepared; compliance reports
Social	Exclusion of VMGs, women, youth, PWDs	Differentiated engagement (translation, separate FGDs, transport facilitation)	% of women, youth, PWD and other vulnerable groups consulted; # of tailored sessions held
	SEAH/GBV risks in expanded farmer mobilization	Implement SEAH/GBV Action Plan, train facilitators, provide confidential GM channels	# of trainings conducted; # of SEAH/GBV cases reported/resolved

Category	Specific Risks / Impacts	Mitigation Measures	Monitoring Indicators
	Limited access to credit and weak farmer institutions	Strengthen SACCOs, FPOs, provide financial literacy and governance training	# of SACCOs operationalized; % of farmers accessing credit
Institutional	Capacity constraints at county level	Training, deployment of safeguards officers, technical assistance	# of officers trained/deployed; frequency of safeguards reports
	Weak grievance redress uptake	Strengthen GM awareness, multiple access channels (digital + traditional)	# of grievances received/resolved; stakeholder satisfaction surveys

- 73) The project continues to monitor the implementation of safeguards to address these risks, documenting how they have materialized in practice and updating mitigation measures in line with stakeholder feedback and the scope of AF. New dimensions such as urban food systems and expanded county coverage have introduced additional considerations, including food safety, urban market regulation, and integration of disadvantaged wards into FPO/SACCO structures.
- 74) Table 4 will therefore be updated regularly to reflect evolving risks, mitigation measures, and stakeholder feedback. Monitoring results will be redisclosed to stakeholders through county barazas, websites, and periodic reports to ensure transparency and accountability.

2. POLICY, LEGAL, AND INSTITUTIONAL FRAMEWORK

2.1 INTRODUCTION

- 75) Public participation in decision making follows from the legislation of the Republic of Kenya and obligations under international agreements. The Constitution of Kenya (CoK, 2010) entrenches a wide range of social, political, economic, and cultural rights and revolutionizes the entire system of political governance by devolving authority to county governments and decreeing the need for citizen participation in decision making. It enshrines the right to access of information and makes principles of international laws and treaties ratified by Kenya an integral part of the country's laws as summarized in Table 5.

Table 5: Policy, Legal, and Institutional Framework Gap Analysis

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p><u>Social and Environmental Assessment and Management System (ESSI)</u></p> <p><i>Use of Borrower’s Environmental and Social Framework</i> When a project is proposed for Bank support, the Borrower and the Bank will consider whether to use all, or part, of the Borrower’s ES Framework in the assessment, development, and implementation of a project. Such use may be proposed provided this is likely to address the risks and impacts of the project and enable the project to achieve objectives materially consistent with the ESSs.</p> <p><i>Environmental and Social Assessment</i> The Borrower will carry out an environmental and social assessment of the project to assess the environmental and social risks and impacts of the project throughout the project life cycle. The assessment will be proportionate to the potential risks and impacts of the project, and will assess, in an integrated way, all relevant direct, indirect, and cumulative environmental and social risks and impacts throughout the project life cycle, including those specifically identified in ESSs2–10.</p> <p><i>Environmental and Social Commitment Plan</i></p>	<p><i>Use of Borrower’s Environmental and Social Framework</i></p> <p><u>Environmental Management and Coordination Act 1999;</u> Provides for protection and conservation of the environment, environmental impact assessment, and environmental auditing and monitoring.</p> <p><u>Environmental Management and Coordination (Amendment) Act 2015</u> (legal Notice No 5 of 2015) and provides for a full ESIA study for high-risk projects.</p> <p><u>Environmental Impact Assessment Guidelines and Administrative Procedures, 2002.</u> The guidelines provide the steps in implementation of an EIA, Monitoring and Environmental Audit Provides for carrying out an EIA Study where a Project will have significant environmental impacts.</p>	<p>No significant gaps between ESS I and the various national laws except that the project will refocus on reducing community vulnerability through inclusion, targeting, and participation of all without discrimination.</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>The Borrower will develop and implement an ESCP, which will set out measures and actions required for the project to achieve compliance with the ESSs over a specified time frame. The ESCP will be agreed upon with the Bank and will form part of the legal agreement. The draft ESCP will be disclosed as early as possible, and before project appraisal.</p> <p>Project Monitoring and Reporting The Borrower will monitor the environmental and social performance of the project in accordance with the legal agreement (including the ESCP). The extent and mode of monitoring will be agreed upon with the Bank and will be proportional to the nature of the project, the project’s environmental and social risks and impacts, and compliance requirements. The Borrower will ensure that adequate institutional arrangements, systems, resources, and personnel are in place to carry out monitoring. Where appropriate and as set out in the ESCP, the Borrower will engage stakeholders and third parties, such as independent experts, local communities, or non-governmental organizations (NGOs), to complement or verify its own monitoring activities. Where other agencies or third parties are responsible for managing specific risks and impacts and implementing mitigation measures, the Borrower will collaborate with such agencies and third</p>	<p>Project Monitoring and Reporting EMCA Cap. 387 provides for ESIA studies including as part of ESMP clear procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements.</p> <p>Environmental (Impact Assessment and Audit Regulations), 2003 Environmental Audit (EA) is the systematic documentation, periodic and objective evaluation of activities and processes of an ongoing project. The purpose of EA is to determine the extent to which the activities and programs conform to the approved environmental management plan. An initial environmental audit and a control audit are conducted by a qualified and authorized environmental auditor or environmental inspector who is an expert or a firm of experts registered by NEMA. In the case of an ongoing project NEMA requires the proponent to undertake an</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>parties to establish and monitor such mitigation measures.</p> <p>Stakeholder Engagement and Information Disclosure As set out in ESS10, the Borrower will continue to engage with, and provide sufficient information to stakeholders throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.</p>	<p>initial environmental audit study to provide baseline information upon which subsequent environmental audits shall be based. The proponent shall be issued with an acknowledgement letter and an improvement order where necessary.</p> <p>Stakeholder Engagement and Information Disclosure EMCA Cap. 387 provides for ESIA studies to include stakeholder engagement and disclosure of information.</p>	
<p><u>Labour and Working Conditions (ESS2)</u> recognizes that the pursuit of economic growth through employment creation and income generation should be balanced with protection for basic rights of workers.</p> <ul style="list-style-type: none"> ● ESS2 provides specific requirements on occupation health and safety, expanding upon the World Bank Group’s Environmental, Health and Safety Guidelines. ● It introduces labor management procedures. ● It requires non-discrimination and equal opportunity. ● ESS2 includes provisions on the treatment of direct, contracted, community, and primary supply workers, and government civil servants. ● ESS2 recognizes workers’ organizations. It requires 	<p><u>Occupational Safety and Health Act (OSHA), 2007;</u></p> <ul style="list-style-type: none"> ● Provides for the safety, health and welfare of workers and all persons lawfully present at workplaces. ● Provides for the registration of workplaces. ● provides for maintenance of cleanliness of workplaces, adequate lighting and ventilation, provision of sanitary conveniences, ● Outlines safety requirements in use of machinery to prevent accidents and injuries. <p><u>The Factories and Other Places of Work (Noise Prevention and Control) Rules, 2005</u> Rules provide for the maximum noise exposure levels for workers in places of work and for the provision of protective equipment for those exposed to high noise levels.</p>	<p>No significant gaps between ESS 2 and the various national laws, but the project will have a keen eye on reducing child protection and sexual exploitation, abuse and harassment at the point of employment especially for women</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>a grievance mechanism for all project workers.</p> <ul style="list-style-type: none"> ● ESS2 includes protection of project workers, including vulnerable workers, such as women, and persons with disabilities. ● Prevents the use of all forms of forced labor and child labor <p>Working Conditions and Management of Workers Relationship The Borrower will develop and implement written labor management procedures applicable to the project. These procedures will set out the way in which project workers will be managed, in accordance with the requirements of national law and this ESS 2. The procedures address the way in which this ESS will apply to different categories of project workers, including direct workers, and the way in which the Borrower will require third parties to manage their workers.</p> <p>Non-Discrimination and Equal Opportunity</p>	<p>Provide that an occupier shall also institute noise reduction measures at the source of noise in the workplace.</p> <p><u>Environmental Management and Coordination (Noise and Excessive Vibration Pollution) (Control) Regulations 2009</u></p> <ul style="list-style-type: none"> ● Prohibits the generation of unreasonable, unnecessary or unusual noise which annoys, disturbs, injures or endangers the comfort, repose, health or safety of others and the environment. ● Provides for the maximum noise levels permissible in various environmental set ups such as residential areas, places of worship, commercial areas and mixed residential <p>Working Conditions and Management of Workers Relationship Kenya’s employment and labor laws workers are guided by clear labor management procedures.</p> <p>Non-Discrimination and Equal Opportunity</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Decisions relating to the employment or treatment of project workers will not be made on the basis of personal characteristics unrelated to inherent job requirements. The employment of project workers will be based on the principle of equal opportunity and fair treatment, and there will be no discrimination with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, or disciplinary practices. The labor management procedures will set out measures to prevent and address harassment, intimidation, and/or exploitation. Where national law is inconsistent with this requirement, the project will seek to carry out project activities in a manner that is consistent with the requirements to the extent possible. The borrower will take measures to prevent and address harassment, intimidation, and/or exploitation, especially in regard to women. The principles of non-discrimination apply to migrant workers.</p> <p>Workers Organization In countries where national law recognizes workers' rights to form and to join workers' organizations of their choosing and to bargain collectively without interference, the project will be implemented in</p>	<p>The constitution of Kenya does not allow discrimination of any form and prohibit discrimination on race, sex, ethnicity, religion, and several other criteria, and further the labor laws also provide for equal opportunity and non-discrimination of any form for workers with respect to employment including any form of intimidation or harassment. However, the laws do not explicitly prohibit discrimination based on sexual orientation or gender identity.”</p> <p>Workers Organization Kenya's employment and labor laws fully provide for grievance redress mechanism establishment in all workplaces</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>accordance with national law. In such circumstances, the role of legally established workers’ organizations and legitimate workers’ representatives will be respected, and they will be provided with information needed for meaningful negotiation in a timely manner. Where national law restricts workers’ organizations, the project will not restrict project workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The Borrower should not seek to influence or control these alternative mechanisms. The Borrower will not discriminate or retaliate against project workers who participate, or seek to participate, in such workers’ organizations and collective bargaining or alternative mechanisms.</p> <p>The Borrower will provide a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns and inform the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.</p> <p>Protecting the Workforce Child Labor and Minimum Age A child under the minimum age will not be employed or engaged in connection with the project. The labor management procedures will specify the minimum age</p>	<p>through freedom to join associations or trade unions and enter into collective bargaining agreements.</p> <p>Child Labor and Minimum Age Employment Act, 2007 defines a “child” to mean a person who has not attained the age of eighteen years. This is the same definition in the children Act, 2001 and the Industrial Act. The law does not prohibit employment of children between the ages of 16-18 per se. It prohibits child</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>for employment or engagement in connection with the project, which will be the age of 14 unless national law specifies a higher age.</p> <p>Forced Labor The borrower will not employ forced labor, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty. This covers any kind of involuntary or compulsory labor, such as indentured labor, bonded labor, or similar labor-contracting arrangements. The borrower will not employ trafficked persons.</p> <p>Grievance Mechanisms 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.</p> <p>Occupational Health and Safety The Borrower to provide a safe and healthy work environment taking into account inherent risks in its</p>	<p>labor which occurs when certain factors accompany such employment apply.</p> <p>Forced Labor Any form of forced labor, including trafficking, is prohibited by the labor laws.</p> <p>Grievance Mechanisms Kenya’s employment and labor laws provide for all workers the freedom and right to join associations and trade unions where they can air their grievances without fear of victimization.</p> <p>Occupational Health and Safety The Occupational Safety and Health Act has clear provisions and requirements for ensuring health and safety of workers</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>particular sector and specific classes of hazards in the work areas. Measures relating to occupational health and safety will be applied to the project. The OHS measures will take into account the General Environmental Health and Safety Guidelines (EHSGs) and, as appropriate, the industry specific EHSGs and other Good International Industry Practice (GIIP). The OHS measures applying to the project will be set out in the legal agreement and the Environmental and Social Commitment Plan (ESCP).</p> <p>Contracted Workers The Borrower will make reasonable efforts to ascertain that third parties who engage contracted workers are legitimate and reliable entities and have in place labor management procedures applicable to the project that will allow them to operate in accordance with the requirements of this ESS.</p> <p>Community Workers Projects may include the use of community workers in a number of different circumstances, including where labor is provided by the community as a contribution to the project, or where projects are designed and conducted for the purpose of fostering community-driven development, providing a social safety net or providing targeted assistance in ecologically sensitive</p>	<p>and stipulates the requirements of the employer with respect to the same.</p> <p>Contracted Workers Kenya’s employment and labor laws provide for protection of the rights of all categories of workers, including contracted workers.</p> <p>Community Workers Kenyan labor laws do not interfere with agreements made between workers and employers for as long as the agreement is in line with the employment act.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>and conflict-affected situations. Given the nature and objectives of such projects, the application of all requirements of ESS2 may not be appropriate. In all such circumstances, the Borrower will require measures to be implemented to ascertain whether such labor is or will be provided on a voluntary basis as an outcome of individual or community agreement.</p> <p>Primary Supply Workers As part of the environmental and social assessment, the Borrower will identify potential risks of child labor, forced labor, and serious safety issues which may arise in relation to primary suppliers.</p>	<p>Primary Supply Workers Kenya’s labor laws provide and ensure that rights of all categories of workers are protected including workers employed by primary suppliers. Child labor, forced labor and workers safety are considered a criminal offence by the labor and employment laws as well as occupational safety and health legislation.</p>	
<p>Resource Efficiency and Pollution Prevention and Management (ESS3) recognizes that economic activity and urbanization often generate pollution to air, water, and land, and consume finite resources that may threaten people, ecosystem services, and the environment at the local, regional, and global levels. The current and projected atmospheric concentration of greenhouse gases (GHG) threatens the welfare of current and future generations. At the same time, more efficient and effective resource use, pollution prevention, and GHG emission avoidance, and mitigation technologies and practices have become more accessible and achievable.</p>	<p>Kenya has a variety of legal and regulatory statutes that address and enforce Pollution Prevention and Management including (Air, Water, Hazardous and Non-Hazardous Waste, Chemical and Hazardous Materials, Pesticides) as described below.</p> <p>Environmental Management and Coordination (Water Quality) Regulations 2006</p> <ul style="list-style-type: none"> ● Provides for the protection of ground and surface water resources. ● Provides the water quality standards for sources of domestic water. ● Provides that an EIA shall be carried out and license 	<p>No significant gaps between ESS 3 and the various national laws.</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>The Borrower will consider ambient conditions and apply technically and financially feasible resource efficiency and pollution prevention measures in accordance with the mitigation hierarchy. The measures will be proportional to the risks and impacts associated with the project and consistent with GIIIP, in the first instance the Environmental Health and Safety Guidelines (EHSGs).</p> <ul style="list-style-type: none"> ● Include requirements on management of wastes, chemical and hazardous materials. ● Provides for avoidance or minimization and/generation of hazardous and non-hazardous waste ● Minimize and manage the risks and impacts associated with pesticide use ● Provides for measures to avoid or minimize adverse impacts on human health and the environment by avoiding or minimizing pollution from project activities. ● Provides for measures to promote more sustainable use of resources, including energy and water. ● Requires that project that involving significant pest management issues, the Project will prepare IPMP ● Requires that the Ministry will not use 	<p>obtained to abstract water or carry out activities that may have adverse impacts on the quantity or quality of water in lakes, rivers, streams, springs and wells</p> <ul style="list-style-type: none"> ● Provides the water quality standards for effluent discharged into the aquatic environment. <p><u>Environmental Management and Coordination (Waste Management) Regulations 2006</u></p> <ul style="list-style-type: none"> ● Provides for standards for handling, transportation and disposal of various types of wastes including pesticide wastes and other hazardous wastes. ● Requirements to ensure waste minimization or cleaner production, waste segregation, recycling or composting. ● Provides for licensing of vehicle transporting waste. ● Provides for the licensing of waste disposal facilities. <p><u>Environmental Management and Coordination (Controlled Substances) Regulations 2007 (Legal Notice No 73 of 2007)</u></p> <ul style="list-style-type: none"> ● Provides for measures for storage, handling packaging and disposal of products with ozone-depleting substances. <p><u>Environmental Management and Coordination (Air Quality) Regulations, 2014</u></p> <ul style="list-style-type: none"> ● Provides for ambient air quality tolerance limits. ● Prohibits air pollution in a manner that exceeds specified levels. 	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>pesticides or pesticides products or formulations unless such use is in compliance with WBG EHSs</p> <ul style="list-style-type: none"> ● Requires not to use any pesticides products that contain active ingredients that are restricted under applicable international conventions or protocols ● Provides for measures to reduce project related GHG emissions. <p>Pollution Prevention and Management The Borrower will avoid the release of pollutants or, when avoidance is not feasible, minimize and control the concentration and mass flow of their release using the performance levels and measures specified in national law or the EHSs, whichever is most stringent. This applies to the release of pollutants to air, water, and land due to routine, nonroutine, and accidental circumstances, and with the potential for local, regional, and transboundary impacts.</p> <p>Air Pollution Management In addition to the resource efficiency measures described above, the Borrower will consider alternatives and implement technically and financially feasible and cost-effective options to avoid or minimize project-related air emissions during the design, construction, and operation of the project.</p>	<ul style="list-style-type: none"> ● Prohibits air pollution in controlled areas including residential areas, hospitals, National Parks, reserves and sanctuaries, conservation areas and central business districts ● Provides for the control of vehicular emissions. ● Provides for prevention of dispersion of visible particulate matter or dust from any material being transported. 	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Management of Hazardous and Non-hazardous Waste. The Borrower will avoid the generation of hazardous and non-hazardous waste. Where waste generation cannot be avoided, the Borrower will minimize the generation of waste, and reuse, recycle and recover waste in a manner that is safe for human health and the environment. Where waste cannot be reused, recycled or recovered, the Borrower will treat, destroy, or dispose of it in an environmentally sound and safe manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.</p> <p>Management of Chemicals and Hazardous Materials The Borrower will avoid the manufacture, trade, and use of chemicals and hazardous materials subject to international bans, restrictions or phaseouts unless for an acceptable purpose as defined by the conventions or protocols or if an exemption has been obtained by the Borrower, consistent with Borrower government commitments under the applicable international agreements.</p> <p>Management of Pesticides</p>	<p>Management of Pesticides Pest Control Products Act Chapter 346, 2012</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Where projects involve recourse to pest management measures, the Borrower will give preference to integrated pest management (IPM) or integrated vector management (IVM) approaches using combined or multiple tactics.</p>	<p>This Act covers the use, application, importation, and trade in pest products.</p> <p>The Pest Control Products (Licensing of Premises) Regulations prohibits any person from using any premises for purposes of manufacturing, formulating, packaging, and storing pest control products without a license issued under these regulations.</p> <p>The Pest Control Products (Labeling, Advertising and Packaging) Regulations, 1984– address the design of pesticide packages (packaging and labeling).</p> <p>The Pest Control Products (Importation and Exportation) Regulations, 1984 contain provisions specifically addressing the import and export of pesticides.</p> <p>Pest Control Products (Disposal) Regulations, 2006-Regulation 2 provides that those disposing pesticides for commercial purposes must be in possession of a license, and the use of any pesticide disposal method must be approved by the PCPB.</p>	
<p>Community Health and Safety (ESS4) recognizes that project activities, equipment, and infrastructure can increase community exposure to risks and impacts. In addition, communities that are already subjected to impacts from climate change may also experience an acceleration or intensification of impacts due to project activities.</p> <p>ESS4 addresses the health, safety, and security risks and impacts on project-affected communities and the</p>	<p>Kenya has a number of legal and regulatory statutes that address community health and safety, hazard material management and safety, safety services, traffic and road safety, ecosystem services, community exposure to diseases, emergency preparedness and security personnel.</p> <p>The Public Health Act (Cap 242)</p> <ul style="list-style-type: none"> Provides for the prevention of the occurrence of nuisance or conditions dangerous/injurious to humans. 	<p>No significant gaps between ESS 4 and the various national laws.</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>corresponding responsibility of Borrowers to avoid or minimize such risks and impacts, with particular attention to people who, because of their particular circumstances, may be vulnerable.</p> <p>ESS 4 Objectives include:</p> <ul style="list-style-type: none"> ● To anticipate and avoid adverse impacts on the health and safety of project-affected communities during the project life cycle from both routine and no routine circumstances. ● To promote quality and safety, and considerations relating to climate change in the design and construction of infrastructure, including dams. ● To avoid or minimize community exposure to project-related traffic and road safety risks, diseases, and hazardous materials. ● To have in place effective measures to address emergency events. ● To ensure that the safeguarding of personnel and property is carried out in a manner that avoids or minimizes risks to the project-affected communities. <p>Community Health and Safety The Borrower will evaluate the risks and impacts of the project on the health and safety of the affected communities during the project life cycle, including</p>	<ul style="list-style-type: none"> ● Provides that the relevant local authority shall take all lawful, necessary and reasonably practicable measures. <p><u>Environmental Management and Coordination Act 1999;</u> Provides for protection and conservation of the environment, environmental impact assessment, and environmental auditing and monitoring.</p> <p><u>Environmental Management and Coordination (Amendment) Act 2015</u> (legal Notice No 5 of 2015) and provides for a full ESIA study for high-risk projects.</p> <p><u>Environmental Impact Assessment Guidelines and administrative procedures, 2002.</u> The guidelines provide the steps in implementation of an EIA, Monitoring and Environmental Audit</p> <p>Provides for carrying out of an EIA Study where a Project will have significant environmental impacts and the Project Report does not disclose adequate mitigation measures</p> <p><u>Environmental Management and Coordination (Water Quality) Regulations 2006</u></p> <ul style="list-style-type: none"> ● Provides for the protection of ground and surface water resources. ● Provides the water quality standards for effluent 	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>those who, because of their particular circumstances, may be vulnerable. The Borrower will identify risks and impacts and propose mitigation measures in accordance with the mitigation hierarchy.</p> <p>Infrastructure, Equipment Design and Safety The Borrower will design, construct, operate, and decommission the structural elements of the project in accordance with national legal requirements, the EHSs and other GIIP, taking into consideration safety risks to third parties and affected communities. Structural elements of a project will be designed and constructed by competent professionals and certified or approved by competent authorities or professionals. Structural design will take into account climate change considerations, as appropriate.</p> <p>Hazardous Materials Management and Safety The Borrower will avoid or minimize the potential for community exposure to hazardous materials and substances that may be released by the project.</p> <p>Safety of Services Where the project involves provision of services to communities, the Borrower will establish and implement appropriate quality management systems to anticipate and minimize risks and impacts that such</p>	<p>discharged into the aquatic environment.</p> <p><u>Environmental Management and Coordination (Waste Management) Regulations 2006</u></p> <ul style="list-style-type: none"> • Provides for standards for handling, transportation, and disposal of various types of wastes including hazardous wastes. • Requirements to ensure waste minimization or cleaner production, waste segregation, recycling, or composting. • Provides for licensing of vehicle transporting waste. • Provides for the licensing of waste disposal facilities. <p><u>Environmental Management and Coordination (Controlled Substances) Regulations 2007 (Legal Notice No 73 of 2007)</u></p> <ul style="list-style-type: none"> • Provides for measures for storage, handling packaging and disposal of products with ozone-depleting substances. <p><u>Environmental Management and Coordination (Air Quality) Regulations, 2014</u></p> <ul style="list-style-type: none"> • Provides for ambient air quality tolerance limits. • Prohibits air pollution in a manner that exceeds specified levels. • Prohibits air pollution in controlled areas including residential areas, hospitals, National Parks, reserves and sanctuaries, conservation areas and central business districts 	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>services may have on community health and safety. In such circumstances, the Borrower will also apply the concept of universal access, where technically and financially feasible.</p> <p>Traffic and Road Safety The Borrower will identify, evaluate, and monitor the potential traffic and road safety risks to workers, affected communities, and road users throughout the project life cycle and, where appropriate, will develop measures and plans to address them. The Borrower will incorporate technically and financially feasible road safety measures into the project design to prevent and mitigate potential road safety risks to road users and affected communities.</p> <p>Ecosystem Services The project's direct impacts on ecosystem services may result in adverse health and safety risks to and impacts on affected communities. With respect to this ESS, ecosystem services are limited to provisioning and regulating services as defined in ESS1. Where appropriate and feasible, the Borrower will identify the project's potential risks and impacts on ecosystem services that may be exacerbated by climate change. Adverse impacts will be avoided, and if they are unavoidable, the Borrower will implement appropriate mitigation measures.</p>	<ul style="list-style-type: none"> ● Provides for the control of vehicular emissions. ● Provides for prevention of dispersion of visible particulate matter or dust from any material being transported. <p>Traffic and Road Safety Kenya has a Traffic Act and National Transport and Safety Authority (NTSA) Act which ensures the implementation of all traffic rules and regulations including protecting communities from road safety hazards and risks.</p> <p>Ecosystem Services <u>Environmental Management and Coordination Act 1999;</u> Provides for protection and conservation of the environment, environmental impact assessment, and environmental auditing and monitoring. <u>Environmental Management and Coordination (Amendment) Act 2015</u> (legal Notice No 5 of 2015) and provides for a full ESIA study for high-risk projects.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Community Exposure to Disease The Borrower will avoid or minimize the potential for community exposure to waterborne, water based, water-related, and vector-borne diseases, and communicable and non-communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups. Where specific diseases are endemic in communities in the project area, the Borrower is encouraged to explore opportunities during the project life cycle to improve environmental conditions that could help minimize their incidence.</p> <p>Emergency Preparedness and Response The Borrower will identify and implement measures to address emergency events. An emergency event is an unanticipated incident, arising from both natural and man-made hazards, typically in the form of fire, explosions, leaks, or spills, which may occur for a variety of different reasons, including failure to implement operating procedures that are designed to prevent their occurrence, extreme weather, or lack of early warning. The measures will be designed to address the emergency event in a coordinated and expeditious manner; to prevent it from injuring the health and safety of the community; and to minimize,</p>	<p>Community Exposure to Disease <u>The Public Health Act (Cap 242)</u></p> <ul style="list-style-type: none"> ● Provides for the prevention of the occurrence of nuisance or conditions dangerous/injurious to humans. ● Provides that the relevant local authority shall take all lawful, necessary and reasonably practicable measures. ● Kenya Guidelines on Management of COVID-19 provides for approaches towards managing the spread of COVID-19 including social distancing and quarantine. <p>Emergency Preparedness and Response <u>Environmental Management and Coordination Act 1999;</u> Provides for development of emergency preparedness and response plans for minimizing risks to communities and ensuring participation of communities in response.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>mitigate, and compensate for any impacts that may occur.</p> <p>Security Personnel When the Borrower retains direct or contracted workers to provide security to safeguard its personnel and property, it will assess risks posed by these security arrangements to those within and outside the project site. In making such arrangements, the Borrower will be guided by the principles of proportionality and GIIP, and by applicable law in relation to hiring, rules of conduct, training, equipping, and monitoring of such security workers. The Borrower will not sanction any use of force by direct or contracted workers in providing security except when used for preventive and defensive purposes in proportion to the nature and extent of the threat. The Borrower will (i) make reasonable inquiries to verify that the direct or contracted workers retained by the Borrower to provide security are not implicated in past abuses; (ii) train them adequately (or determine that they are properly trained) in the use of force (and where applicable, firearms) and appropriate conduct toward workers and affected communities; and (iii) require them to act within the applicable law and any requirements set out in the Environmental and Social Commitment (ESCP).</p>	<p>Security Personnel The Private Security Regulation Act 2016 provides for conduct of contracted security personnel including hiring, training, use of force and association with communities. The regulations include and require that security personnel undergo mandatory background checks by the National Intelligence Service (NIS) and obtain a certificate of good conduct form NIS before consideration for employment.</p> <p>The National Police Act 2014 was established to Regulate and coordinate duties to be performed by police officers; regulating the granting of leave to police officers; prescribing arrangements and procedures for providing, assisting in or coordinating staff development programmes; and. the employment of civilian staff within the Service.</p> <p>The Firearms Act is an act of parliament established for regulating, licensing, and controlling the manufacture, importation, exportation, transportation, sale, repair, storage, possession and use of firearms, ammunition, air guns and destructive devices.</p> <p>The Independent Policing Oversight Authority was established through an Act of Parliament published in November 2011 to provide for civilian oversight over the work of the police in Kenya.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p><u>Land Acquisition, Restrictions on land use and Involuntary Resettlement (ESS5) -</u> includes situations where project makes land physically unusable or inaccessible, even when there is no land acquisition. It covers restrictions on access to communal property and natural resources, including marine and aquatic, timber, freshwater, hunting and gathering ground, grazing, and cropping areas. It contains criteria on voluntary transactions, land donations, forced eviction and eminent domain; as well as a definition of replacement cost, including where inflation exists. ESS5 provides some flexibility where a party derived substantial income from multiple illegal rental units. It includes provisions to protect and support women, including documentation, training, access to credit and jobs.</p> <p><u>Objectives:</u> The Environmental and Social Standard on Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (ESS5), requires Borrowers to: • Avoid or minimize involuntary resettlement by exploring project design alternatives • Avoid forced eviction • Mitigate unavoidable adverse impacts from land acquisition or restrictions on land use through timely compensation for loss of assets at replacement cost and assisting displaced persons in their efforts to improve, or at least restore, livelihoods and living</p>	<p>Kenya has several land statutory policies and laws governing land ownership, use, transfer, buying and selling, change of land use, land dispute resolution, etc.</p> <ul style="list-style-type: none"> • Environment and Land Court. Section 20, of the Environment and Land Court Act, 2011 empowers the Environment and Land Court, on its own motion, or on application of the parties to a dispute, to direct the application of including traditional dispute resolution mechanisms. • Land Act No. 6 Of 2012 Revised Edition 2016 [2012] Provide for the sustainable administration and management of land and land-based resources, and for connected purposes. • Community Land Act 2016 Presents an unprecedented opportunity for communities to legally claim rights to their land and have complete decision-making power about how their land is used and managed. 	<p>The main gap is the definition of encroachers and squatters. In the national laws both have no legal basis while in the ESS5, encroachers are compensated (where applicable).</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>standards, in real terms, to pre-displacement levels or to levels prevailing prior to the beginning of project implementation, whichever is higher • Improve living conditions of poor or vulnerable persons who are physically displaced, through provision of adequate housing, access to services and facilities, and security of tenure • Ensure that resettlement activities are planned and implemented with appropriate disclosure of information, meaningful consultation, and informed participation.</p> <p><u>Requirements/application:</u> This ESS applies to permanent or temporary physical and economic displacement resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation: (a) Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national law; (b) Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;⁸ (c) Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access to resource usage where they have traditional or customary tenure, or</p>		

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas, or buffer zones are established in connection with the project;⁹ (d) Relocation of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project-specific cut-off date; (e) Displacement of people as a result of project impacts that render their land unusable or inaccessible; (f) Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds, and grazing and cropping areas; (g) Land rights or claims to land or resources relinquished by individuals or communities without full payment of compensation;¹⁰ and (h) Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation of a project.</p>		
<p><u>Biodiversity Conservation and Sustainable Management of Living Natural Resources (ESS6)</u> recognize protecting and conserving biodiversity and sustainably managing living natural resources are fundamental to sustainable development.</p> <p>ESS6 recognizes the importance of maintaining core ecological functions of habitats, including forests, and</p>	<p>Kenya has a number of legal and statutory laws that govern biodiversity including conservation, and sustainable management as described below.</p> <p><u>The Wildlife Conservation and Management Act, 2013</u></p> <ul style="list-style-type: none"> • Prohibits pollution of wildlife habitats and ecosystems. 	<p>No significant gaps between ESS 6 and the various national laws.</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>the biodiversity they support. Habitat is defined as a terrestrial, freshwater, or marine geographical unit or airway that supports assemblages of living organisms and their interactions with the non-living environment. All habitats support complexities of living organisms and vary in terms of species diversity, abundance, and importance.</p> <p>ESS 6 also addresses sustainable management of primary production and harvesting of living natural resources.</p> <p>ESS6 recognizes the need to consider the livelihood of project-affected parties, including Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, whose access to, or use of, biodiversity or living natural resources may be affected by a project. The potential, positive role of project-affected parties, including Indigenous Peoples, in biodiversity conservation and sustainable management of living natural resources is also considered.</p> <p>Objectives</p> <ul style="list-style-type: none"> • To protect and conserve biodiversity and habitats. • To apply the mitigation hierarchy and the precautionary approach in the design and 	<p><u>The Forest Conservation and Management Act, 2016</u></p> <ul style="list-style-type: none"> • Prohibits the destruction of protected tree species or family of trees • Provides for the sustainable management of indigenous forests and woodlands. <p><u>The Environmental Management and Coordination (Wetlands) Regulations, 2009</u> applies to all wetlands in Kenya whether occurring in private or public land. The objective of the regulations is to provide for the conservation and sustainable use of wetlands and their resources in Kenya and promote the integration of sustainable use of resources in wetlands into the local and national management of natural resources for socio-economic development.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>implementation of projects that could have an impact on biodiversity.</p> <ul style="list-style-type: none"> • To promote the sustainable management of living natural resources. • To support livelihoods of local communities, including Indigenous Peoples, and inclusive economic development, through the adoption of practices that integrate conservation needs and development priorities. <p>Requirements General</p> <p>The environmental and social assessment as set out in ESS1 will consider direct, indirect, and cumulative project-related impacts on habitats and the biodiversity they support. This assessment will consider threats to biodiversity, for example, habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, pollution and incidental take, as well as projected climate change impacts. It will determine the significance of biodiversity or habitats based on their vulnerability and irreplaceability at a global, regional, or national level and will also take into account the differing values attached to biodiversity and habitats by project-affected parties and other interested parties.</p>	<p>Assessment of Risks and Impacts EMCA Cap.387;</p> <p>Provides for protection and conservation of the environment, environmental impact assessment, and environmental auditing and monitoring. <i>The Act provides for a full ESIA study for high-risk projects.</i></p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Assessment of Risks and Impacts Through the environmental and social assessment, the Borrower will identify the potential project related risks to and impacts on habitats and the biodiversity that they support. In accordance with the mitigation hierarchy, the Borrower will make the initial assessment of project risks and impacts without taking into account the possibility of biodiversity offsets. The assessment undertaken by the Borrower will include identification of the types of habitats potentially affected and consideration of potential risks to and impacts on the ecological function of the habitats. The assessment will encompass any areas of potential biodiversity importance that may be affected by the project, whether or not they are protected under national law. The extent of the assessment will be proportional to the risks and impacts, based on their likelihood, significance, and severity, and will reflect the concerns of project affected parties and other interested parties.</p> <p>Primary Suppliers Where a Borrower is purchasing natural resource commodities, including food, timber, and fiber, that are known to originate from areas where there is a risk of significant conversion or significant degradation of natural or critical habitats, the Borrower’s environmental and social assessment will include an</p>	<p>Primary Suppliers <u>Environmental Management and Coordination Act 1999;</u> Provides for protection and conservation of the environment, environmental impact assessment, and environmental auditing and monitoring.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
evaluation of the systems and verification practices used by the primary suppliers.	Environmental Management and Coordination (Amendment) Act 2015 (legal Notice No 5 of 2015) and provides for a full ESIA study for high-risk projects.	
<p>Indigenous peoples/Sub-Saharan African historically underserved traditional local communities (ESS7) recognizes that the situation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities varies from region to region and from country to country. The national and regional contexts and the different historical and cultural backgrounds will form part of the environmental and social assessment of the project. In this way, the assessment is intended to support identification of measures to address concerns that project activities may exacerbate tensions between different ethnic or cultural groups.</p> <ul style="list-style-type: none"> • To ensure that the development process fosters full respect for the human rights, dignity, aspirations, identity, culture, and natural resource-based livelihoods of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. • To avoid adverse impacts of projects on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, or when avoidance is not possible, to minimize, mitigate, and/or compensate for such impacts. 	<p>While the term “Indigenous Peoples” is not used in Kenya, the legal framework recognizes particular concerns and rights of minorities and marginalized groups. The Constitution defines a marginalized community as:</p> <p>“A community that, because of its <i>relatively small population</i> or for any other reason, has been unable to fully participate in the integrated social and economic life of Kenya as a whole;</p> <p><i>A traditional community</i> that, out of a need or desire to preserve its unique culture and identity from assimilation, has remained outside the integrated social and economic life of Kenya as a whole;</p> <p><i>An indigenous community</i> that has retained and maintained a traditional lifestyle and livelihood based on a hunter or gatherer economy; or</p> <p><i>Pastoral persons and communities</i>, whether they are (i) nomadic; or (ii) a settled community that, because of its relative geographic isolation, has experienced only marginal participation in the integrated social and economic life of Kenya as a whole” (Article 260; emphasis added).</p>	Gaps between ESS 7 and the various National laws mainly with regards to Free, Prior Informed Consent (FPIC).

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<ul style="list-style-type: none"> ● To promote sustainable development benefits and opportunities for Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities in a manner that is accessible, culturally appropriate, and inclusive. ● To improve project design and promote local support by establishing and maintaining an ongoing relationship based on meaningful consultation with the Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities affected by a project throughout the project's life cycle. ● To obtain the Free, Prior, and Informed Consent (FPIC) of affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in the three circumstances described in this ESS. ● To recognize, respect, and preserve the culture, knowledge, and practices of Indigenous Peoples/ Sub-Saharan African Historically Underserved Traditional Local Communities, and to provide them with an opportunity to adapt to changing conditions in a manner and in a time frame acceptable to them. <p>Requirements General</p>	<p>The Constitution of Kenya adopted in 2010 requires the State to address the needs of vulnerable groups, including “minority or marginalized” and “particular ethnic, religious or cultural communities” (Article 21.3). Specific provisions include: affirmative action programs and policies for minorities and marginalized groups (Articles 27.6 and 56); rights of “cultural or linguistic” communities to maintain their culture and language (7, 44.2 and 56); protection of community land, including land that is “lawfully held, managed or used by specific communities as community forests, grazing areas or shrines,” and “ancestral lands and lands traditionally occupied by hunter-gatherer communities” (63); promotion of representation in Parliament of “...(d) ethnic and other minorities; and (e) marginalized communities” (100); and an equalization fund to provide basic services to marginalized areas (204).</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>A key purpose of this ESS is to ensure that Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities present in or with collective attachment to the project area are fully consulted about, and have opportunities to actively participate in, project design and the determination of project implementation arrangements. The scope and scale of consultation, as well as subsequent project planning and documentation processes, will be proportionate to the scope and scale of potential project risks and impacts as they may affect Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>Projects Designed Solely to Benefit Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities Where projects are designed to provide benefits only to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, the Borrower will proactively engage with the relevant Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities to ensure their ownership and participation in project design, implementation, monitoring, and evaluation. The Borrower will also consult with them as to the cultural appropriateness of proposed services or facilities and will seek to identify and address any economic or</p>		

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>social constraints (including those relating to gender) that may limit opportunities to benefit from, or participate in, the project.</p> <p>When Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are the sole, or the overwhelming majority of, project beneficiaries, the elements of the plan may be included in the overall project design, and preparation of a stand-alone Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities Plan is not necessary.</p> <p>Projects Where Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities Are Not the Sole Beneficiaries</p> <p>When Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities are not the only beneficiaries of the project, planning requirements will vary with circumstances. The Borrower will design and implement the project in a manner that provides affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities with equitable access to project benefits. The concerns or preferences of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will be addressed</p>		

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>through meaningful consultation and project design, and documentation will summarize the consultation results and describe how Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' issues have been addressed in project design. Arrangements for ongoing consultations during implementation and monitoring will also be described.</p> <p>The Borrower will prepare a time-bound plan, such as an Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities plan setting out the measures or actions proposed. In some circumstances, a broader integrated community development plan will be prepared, addressing all beneficiaries of the project and incorporating necessary information relating to the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>Avoidance of Adverse Impacts Adverse impacts on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will be avoided where possible. Where alternatives have been explored and adverse impacts are unavoidable, the Borrower will minimize and/or compensate for these impacts in a culturally appropriate manner proportionate to the nature and</p>	<p>Avoidance of Adverse Impacts The Constitution of Kenya adopted in 2010 requires the State to address the needs of vulnerable groups, including “minority or marginalized” and “particular ethnic, religious or cultural communities” (Article 21.3).</p> <p><u>Environmental Management and Coordination Act 1999;</u> Requires undertaking of ESIA studies and identification of risks and impacts including on communities.</p> <p><u>Environmental Management and Coordination (Amendment) Act 2015</u> (legal Notice No 5 of 2015) and provides for a full ESIA study for high-risk projects.</p> <p>Mitigation and Development Benefits The Constitution of Kenya adopted in 2010 requires the</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>scale of such impacts and the form and degree of vulnerability of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>Mitigation and Development Benefit The Borrower and affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities will identify mitigation measures in alignment with the mitigation hierarchy described in ESS1, as well as opportunities for culturally appropriate and sustainable development benefits. The scope of assessment and mitigation will include cultural impacts as well as physical impacts. The Borrower will ensure the timely delivery of agreed upon measures to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p>Meaningful Consultation Tailored to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities. To promote effective project design, to build local project support or ownership, and to reduce the risk of project-related delays or controversies, the</p>	<p>State to address the needs of vulnerable groups, including “minority or marginalized” and “particular ethnic, religious or cultural communities” (Article 21.3).</p> <p><u>Environmental Management and Coordination Act 1999;</u> Requires undertaking of ESIA studies and identification of risks and impacts including on communities.</p> <p><u>Environmental Management and Coordination Act 1999</u> (legal Notice No 31 and 31 of 2019) and provides for a preparation of SPR for low and medium risk project and CPR for high-risk projects. Meaningful Consultation Tailored to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p> <p><u>Environmental Management and Coordination Act 1999; Environmental Management and Coordination (Amendment) Act 2015</u> (legal Notice No 5 of 2015) Requires that while undertaking ESIA studies meaningful consultations be undertaken with the stakeholders and project affected persons.</p> <p>Article 204 of the Constitution establishes the Equalisation Fund in Kenya into which should be paid one half per cent (0.5%) of all the revenue collected by the national government each year. The national government</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Borrower will undertake an engagement process with affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, as required in ESS10. This engagement process will include stakeholder analysis and engagement planning, disclosure of information, and meaningful consultation in a culturally appropriate and gender and intergenerationally inclusive manner. For Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities, the process of meaningful consultation will also: (a) Involve Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' representative bodies and organizations (e.g., councils of elders or village councils, or chieftains) and, where appropriate, other community members; (b) Provide sufficient time for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' decision-making processes; and (c) Allow for Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' effective participation in the design of project activities or mitigation measures that could potentially affect them either positively or negatively.</p>	<p>should use the Equalization Fund only to provide basic services to marginalized areas.</p> <p>Circumstances Requiring Free, Prior, and Informed Consent (FPIC) Environmental Management and Coordination Act 1999; Environmental Management and Coordination (Amendment) Act 2015 (<i>legal Notice No 5 of 2015</i>). Requires that while undertaking ESIA studies meaningful consultations be undertaken with the stakeholders and project affected persons. Does not Free, Prior, Informed Consent.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Circumstances Requiring Free, Prior, and Informed Consent (FPIC) Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities may be particularly vulnerable to the loss of, alienation from, or exploitation of their land and access to natural and cultural resources. In recognition of this vulnerability, in addition to the General Requirements of this ESS (Section A) and those set out in ESSs 1 and 10, the Borrower will obtain the FPIC of the affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities in circumstances in which the project will: (a) Have adverse impacts on land and natural resources subject to traditional ownership or under customary use or occupation; (b) Cause relocation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities from land and natural resources subject to traditional ownership or under customary use or occupation; or (c) Have significant impacts on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities' 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. In these circumstances, the</p>	<p>Grievance Mechanism National Environment Tribunal- Established under EMCA provides avenue for grievances redress on environment related matters. National Environment Complaints Committee- Established under EMCA provides avenue for grievances redress on environment related matters.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Borrower will engage independent specialists to assist in the identification of the project risks and impacts.</p> <p>Grievance Mechanism The Borrower will ensure that a grievance mechanism is established for the project, as described in ESS10, which is culturally appropriate and accessible to affected Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and takes into account the availability of judicial recourse and customary dispute settlement mechanisms among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p>	<p>Environment and Land Court Act-Establishes environment and land courts across the country for the sole purpose of addressing grievances related to environment and land.</p> <p>Kenya National Commission for Human Rights- Established to address grievances related to human rights including historical injustices on land, culture etc.</p> <p>Commission for Administration of Justice Act- Established office of the Ombudsman-The Commission is the national/constitutional stakeholder instrument for grievance redress.</p> <p>Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and Broader Development Planning. The Constitution of Kenya adopted in 2010 requires the State to address the needs of vulnerable groups, including “minority or marginalized” and “particular ethnic, religious or cultural communities” (Article 21.3). Specific provisions include: affirmative action programs and policies for minorities and marginalized groups (Articles 27.6 and 56); rights of “cultural or linguistic” communities to maintain their culture and language (7, 44.2 and 56); protection of community land, including land that is “lawfully held, managed of used by specific communities as community</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities and Broader Development Planning. The Borrower may request Bank technical or financial support in the context of a specific project or as a separate activity, for preparation of plans, strategies, or other activities intended to strengthen consideration and participation of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (as they may be referred to in the national context) in the development process. This may include a variety of initiatives designed, for example, to: (a) strengthen local legislation to establish recognition of customary or traditional land tenure arrangements; (b) address the gender and intergenerational issues that exist among Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities; (c) protect indigenous knowledge including intellectual property rights; (d) strengthen the capacity of Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities to participate in development planning or programs; and (e) strengthen the capacity of government agencies providing services to Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities.</p>	<p>forests, grazing areas or shrines,” and “ancestral lands and lands traditionally occupied by hunter-gatherer communities” (63); promotion of representation in Parliament of “...(d) ethnic and other minorities; and (e) marginalized communities” (100); and an equalization fund to provide basic services to marginalized areas (204).</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Stakeholder Engagement and Information Disclosure. (ESS 10).</p> <p>This ESS recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.</p> <p>Objectives</p> <ul style="list-style-type: none"> ● To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties. ● To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be taken into account in project design and environmental and social performance. ● To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. ● To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, 	<p>The Environmental Management and Coordination Act provides for ESIA studies to conduct robust stakeholder engagement and information disclosure. Public participation is a key requirement during the ESIA process and outlined in the EIA/EA regulations 2003.</p> <p>The EIA/EA regulations require that:</p> <p>(1) During the process of conducting an environmental impact assessment study under these Regulations, the proponent shall in consultation with the Authority, seek the views of persons who may be affected by the project. (2) In seeking the views of the public, after the approval of the project report by the Authority, the proponent shall - (a) publicize the project and its anticipated effects and benefits by - (i) posting posters in strategic public places in the vicinity of the site of the proposed project informing the affected parties and communities of the proposed project; (ii) publishing a notice on the proposed project for two successive weeks in a newspaper that has a nation-wide circulation; and (iii) making an announcement of the notice in both official and local languages in a radio with a nation-wide coverage for at least once a week for two consecutive weeks; (b) hold at least three public meetings with the affected parties and communities to explain the project and its effects, and to receive their oral or written comments; (c) ensure that appropriate notices are sent out at least one</p>	<p>No significant gaps between ESS 10 and the various national laws.</p>

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>understandable, accessible and appropriate manner and format.</p> <ul style="list-style-type: none"> • To provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow Borrowers to respond to and manage such grievances. <p>Engagement during Project Preparation Stakeholder Identification and Analysis The Borrower will identify the different stakeholders, both project-affected parties and other interested parties. As set out in paragraph 5, individuals or groups that are affected or likely to be affected by the project will be identified as ‘project-affected parties’ and other individuals or groups that may have an interest in the project will be identified as ‘other interested parties’.</p> <p>Stakeholder Engagement Plan In consultation with the Bank, the Borrower will develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for</p>	<p>week prior to the meetings and that the venue and times of the meetings are convenient for the affected communities and the other concerned parties; and (d) ensure, in consultation with the Authority that a suitably qualified coordinator is appointed to receive and record both oral and written comments and any translations thereof received during all public meetings for onward transmission to the Authority</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>future engagement. If significant changes are made to the SEP, the Borrower will disclose the updated SEP.</p> <p>Information Disclosure The Borrower will disclose project information to allow stakeholders to understand the risks and impacts of the project, and potential opportunities. The Borrower will provide stakeholders with access to the following information as early as possible before the Bank proceeds to project appraisal, and in a time frame that enables meaningful consultations with stakeholders on project design.</p> <p>Meaningful Consultation The Borrower will undertake a process of meaningful consultation in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the Borrower to consider and respond to them. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves.</p>	<p>Information Disclosure The Environmental (Impact Assessment And Audit) Regulations, 2003 Part Iv 21. (1) The Authority shall, within fourteen days of receiving the environmental impact assessment study report, invite the public to make oral or written comments on the report. (2) The Authority shall, at the expense of the proponent - (a) publish for two successive weeks in the Gazette and in a newspaper with a nation-wide circulation and in particular with a wide circulation in the area of the proposed project, a public notice once a week inviting the public to submit oral or written comments on the environmental impact assessment study report; and (b) make an announcement of the notice in both official and local languages at least once a week for two consecutive weeks in a radio with a nation-wide coverage. (3) The invitation for public comments under this regulation shall state - (a) the nature of the project; (b) the location of the project; (c) the anticipated impacts of the project and the proposed mitigation measures to respond to the impacts; (d) the times and place where the full report can be inspected; and (e) the period within which the Authority shall receive comments.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
	<p>(4) The notice to be published in the newspaper as specified under sub regulation (3) shall be in Form 8 set out in the First Schedule to these Regulations. 22.</p> <p>(1) Upon receipt of both oral and written comments as specified Public hearing. by section 59 and section 60 of the Act, the Authority may hold a public hearing</p> <p>(2) A public hearing under these Regulations shall be presided over by a suitably qualified person appointed by the Authority.</p> <p>(3) The date and venue of the public hearing shall be publicized at least one week prior to the meeting - (a) by notice in at least one daily newspaper of national circulation and one newspaper of local circulation; (b) by at least two announcements in the local language of the community and the national language through radio with a nationwide coverage.</p> <p>(4) The public hearing shall be conducted at a venue convenient and accessible to people who are likely to be affected by the project.</p> <p>(5) A proponent shall be given an opportunity to make a presentation and to respond to presentations made at the public hearing.</p> <p>(6) The presiding officer shall in consultation with the Authority determine the rules of procedure at the public hearing.</p> <p>(7) On the conclusion of the hearing, the presiding officer shall compile a report of the views presented at the public</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Engagement during Project Implementation and External Reporting The Borrower will continue to engage with, and provide information to, project-affected parties and other interested parties throughout the life cycle of the project, in a manner appropriate to the nature of their interests and the potential environmental and social risks and impacts of the project.</p> <p>Grievance Mechanism The Borrower will respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner. For this purpose, the Borrower will propose and implement a grievance mechanism to receive and facilitate resolution of such concerns and grievances.</p>	<p>hearing and submit the report to the Director General within fourteen days from the date of the public hearing.</p> <p>Engagement during Project Implementation and External Reporting NEMA's EIA/EA regulations 2003 provide for annual environmental audits of all projects during implementation and throughout project life cycle. Further, the regulations require that the reporting (audits) be undertaken by external parties registered with NEMA.</p> <p>Grievance Mechanism EMCA Cap. 387 provides for ESIA studies establishment of a robust grievance redress mechanism.</p> <p>National Environment Tribunal- Established under EMCA provides avenue for grievances redress on environment related matters.</p> <p>National Environment Complaints Committee- Established under EMCA provides avenue for grievances redress on environment related matters.</p> <p>Environment and Land Court Act-Establishes environment and land courts across the country for the sole purpose of addressing grievances related to environment and land.</p>	

Gap Analysis of Environmental and Social Standards Requirements and Kenyan National Laws	National Laws and Requirements	Gaps
<p>Organizational Capacity and Commitment The Borrower will define clear roles, responsibilities, and authority, as well as designate specific personnel to be responsible for the implementation and monitoring of stakeholder engagement activities and compliance with this ESS.</p>	<p><u>Kenya National Commission for Human Rights-</u> Established to address grievances related to human rights including historical injustices on land, culture etc.</p> <p><u>Commission for Administration of Justice Act-</u> Established office of the Ombudsman-The Commission is the national/constitutional stakeholder instrument for grievance redress.</p> <p>Organizational Capacity and Commitment Roles and responsibilities including clear authority lines and personnel for implementation of stakeholder engagement is required in preparation of ESIA and part of ESMP.</p>	

3. PURPOSE AND TIMING OF STAKEHOLDER ENGAGEMENT

3.1 Introduction

- 76) NAVCDP has adopted and continues meaningful stakeholder engagement approaches that provide stakeholders with timely opportunities to express their views and concerns on project risks, impacts, and mitigation measures. and allowed the project management to consider and respond. Stakeholder feedback has been systematically considered and responded to by project management. Stakeholder engagement commenced during project preparation and continues throughout implementation as a dynamic and adaptive process, evolving in response to emerging issues, impacts, and opportunities, including those arising during the AF period.
- 77) The Project Implementation Manual (PIM) is a dynamic reference document that is revised and updated as necessary to reflect the evolving needs of the Project. Consistent with the commitments outlined in the ESCP, SEP is likewise subject to periodic review and revision, including changes in scope, geographic coverage, and activities introduced under AF. Each revised SEP is submitted to the World Bank for clearance and subsequently disclosed within the stipulated effectiveness period, thereby ensuring that stakeholder engagement processes remain current, inclusive, and adequately guided at both county and community levels.
- 78) All stakeholder groups with an interest in the design, implementation, monitoring, and evaluation (M&E) of NAVCDP have been, and will continue to be, engaged through culturally appropriate, gender-responsive, and inclusive participation mechanisms. A structured process and institutional framework for full, meaningful, and effective stakeholder participation is operational across all levels of implementation. During the AF period, particular emphasis will continue to be placed on the inclusion of women, youth, PWDs, minority groups, and VMGs, ensuring that their voices are represented in decision-making and that they equitably benefit from project interventions.
- 79) Stakeholder consultation processes have incorporated and continue to incorporate accessible and context -appropriate procedures to safeguard stakeholders' health and safety, including measures introduced during COVID-19 period. These include the use of virtual platforms (e.g., Zoom, Webex, Microsoft Teams), small-group meetings, and adherence to applicable public health protocols in line with national and international guidance. Consultations with VMGs apply culturally appropriate approaches, including the use of local language and traditional communication structures, as detailed in the VMGF and implemented through site-specific VMG Plans, where applicable.
- 80) It is noted that no NAVCDP activities have resulted in, nor are expected to result in, adverse impacts on land or natural resources under traditional ownership or customary use. References to Free, Prior, and Informed Consent (FPIC) in the ESMF and VMGF relate to community consent processes undertaken prior to soil and land improvement interventions in upstream water pan areas. These processes ensure that VMGs are fully informed, using culturally appropriate methods, about the objectives

and benefits of subprojects, which are designed to improve soil and land quality without causing adverse impacts. No project activities are envisaged to require relocation of VMGs or to affect their cultural heritage. These aspects are addressed in the ESMF, RPF, and VMGF, and the level of consultation remains proportionate to the scale and nature of potential risks.

3.2 Vulnerable and Marginalized Groups

- 81) In accordance with the World Bank ESS 7 on Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities (SSAHUTLAC), NAVCDP recognizes the presence of groups with distinct social, cultural, and economic characteristics that may heighten their vulnerability to project-related exclusion or adverse impacts. Under the Constitution of Kenya (2010), these groups are recognized as Vulnerable and Marginalized Groups (VMGs) pursuant to Articles 56 and 260.
- 82) The NAVCDP Social Assessment conducted in June 2025 confirms the presence of VMGs in 12 of the 34 participating counties. These communities maintain strong collective attachment to ancestral territories and rely on distinct livelihood systems and cultural institutions. Under NAVCDP, VMGs are participating in selected value chains, including coffee, dairy and apiculture, among others.
- 83) Table 6 summarizes the project counties where VMGs are present and the corresponding Indigenous Peoples' communities identified. The presence of VMGs/IPs across multiple project counties has implications for stakeholder engagement, grievance accessibility, and culturally appropriate dispute resolution. Accordingly, the NAVCDP Grievance Mechanism is designed to ensure inclusive access, respect for traditional governance structures where appropriate, and responsiveness to the specific needs of VMGs, consistent with ESS7 requirements.

Table 6: NAVCDP Project Counties with Indigenous Peoples

S/No	Counties	IP Community
1	Nakuru	Ogiek
2	Bungoma	Ogiek
3	Nandi	Talai
4	Trans Nzoia	Ogiek, Sengwer
5	Kiambu	Ogiek
6	Kilifi	Waata
7	Kwale	Waata
8	Uasin Gishu	Sengwer
9	Narok	Ogiek
10	Bomet	Ogiek
11	Taita Taveta	Waata
12	Kericho	Talai

84) Other vulnerable populations including women, youth, chronically ill persons, PWDs, single-parent households, and the elderly, are addressed under the broader social inclusion provisions of the ESMF. The project remains committed to ensuring that all stakeholder engagement respects human rights, dignity, culture, and livelihoods, while enabling VMGs and other vulnerable stakeholders to strengthen ownership and benefit equitably from project interventions.

3.3 Purpose and Timing of Stakeholder Engagement Program

85) The Stakeholder Engagement Program aims to maintain a continuous and effective engagement process with NAVCDP stakeholders throughout the project cycle; listening, learning, and continue to improve NAVCDP performance. The SEP emphasizes 5 guiding principles for engagement: *purposeful, inclusive, timely, transparent, and respectful* approaches that are also culturally appropriate and responsive to concerns of all stakeholders.

3.4 Strategy for Information Disclosure

86) Access to timely and accurate information is central to NAVCDP's transparency and accountability. Effective information disclosure promotes stakeholder understanding of the project, strengthens public trust, and supports informed participation in project decision-making and implementation

87) NAVCDP ensures early disclosure of relevant project information, providing stakeholders with clear guidance to inform their decisions and actions. Information is shared widely, openly, in appropriate formats and at suitable times, with mechanisms to receive, consider, and respond to stakeholder feedback. Engagement with VMGs is conducted using culturally sensitive approaches. Information is disseminated through accessible and cost-effective channels, including public meetings (barazas), project site meetings, religious and cultural forums, and notice boards at government offices, schools, and other public locations, as outlined in the NAVCDP Communication Strategy. For inclusion, particularly of Persons with Disabilities (PWDs), information is also provided through adapted communication channels and assistive technologies to ensure equitable access for all stakeholder groups.

4. PAST STAKEHOLDER ENGAGEMENT ACTIVITIES UNDERTAKEN

4.1 NAVCDP Scoping Mission

88) The Ministry of Agriculture and Livestock Development undertook a scoping mission for NAVCDP, meeting sector ministries, line departments and sister World Bank supported projects' management teams and selected beneficiaries. Executive summaries of the draft ESMF, IPMP, LMP, SMP, RPF, SEP, GM, GBV/SEAH Prevention and Response Action Plan, and VMGF were shared in advance with invitation letters for participants' review. The initial consultations (November 8 -10, 2021), focused on stakeholder identification and public input regarding potential environmental and social impacts and mitigation measures. Adequate notice was provided to participants on dates and venues.

- 89) One stakeholder engagement forum comprised representatives from Indigenous Peoples Organizations in the Coastal region, the Office of the Deputy President's Minority and Marginalized Groups Affairs (with countrywide mandate), the Ogiek People's Organization from the Mau region, and the Sengwer community from Cherangany. In total, 9 participants were present, comprising 6 men and 3 women. This ensured that both male and female voices were included across the different communities, with balanced representation from coastal IPOs, national-level marginalized groups, and forest-dependent Indigenous Peoples in the Mau and Cherangany regions.
- 90) A second stakeholder engagement forum brought together 30 participants, comprising County Environmental and Social Safeguards Compliance Officers (CESSCOs) from ten counties alongside two Indigenous Peoples (IP) representatives from each county. Counties represented included Tana River, Kilifi, Narok, Trans Nzoia, Nandi, Kwale, Taita Taveta, Kiambu, Nakuru, and Uasin Gishu. The IP representatives reflected a broad spectrum of communities, including the Waata from Tana River, Kilifi, and Taita Taveta; the Wasanye from Kwale; the Ogiek from Uasin Gishu, Narok, Nandi, Kiambu, Nakuru, and Trans Nzoia; and the Sengwer from Trans Nzoia. Male participants formed the majority (24), while female participants accounted for six, drawn from Waata, Ogiek, and CESSCO delegations.
- 91) A summary of key issues raised are summarized in Table 7. Copies of the participants' lists for the stakeholder engagement forums are attached in *Annex 2a and 2b*. The stakeholder concerns informed the finalization of the ESMF and other instruments.

Table 7: Key Stakeholder Concerns and Project Responses

S/No	Concerns	Response
1.	The project is huge in terms of investments. Where will be the place of the VMGs in this project? Will we be involved in the design?	All stakeholders will be involved in the design and implementation of each of the sub projects, including VMGs in areas where they are present.
2.	What were the environmental risks and impacts and challenges encountered in the other projects e.g., KCSAP, NARGIP? Has a completion report for the past projects undertaken to determine the lessons learned?	KCSAP and NARGIP have moderate environmental and social impacts which are similar to those NAVCDP will have. ESIA reports were prepared for the sub projects and disclosed. These reports are available online (www.kilimo.go.ke).
3.	At what level do we undertake the environmental impacts assessment? There are small and huge projects?	Screening will be undertaken for all the sub projects and a determination of the further environmental and social analysis made based on the screening.
4.	We have provided our contributions at this stage, and we are glad that we	A Stakeholder Engagement Plan has been prepared for this project and will ensure

S/No	Concerns	Response
	have been consulted. At implementation, will we be consulted?	that consultation with all stakeholders is undertaken throughout the project implementation phases.
5.	How will the use of pesticides affect the value chains between each other? Use of pesticides in potatoes ends up impacting on bees?	There is a possibility of pesticide use in one value chain adversely impacting another value chain. The IPMF developed will provide a framework for the use of pesticides. In addition, where the sub-project screening will indicate that significant pesticides will be used then sub-project specific IPMP will be prepared.
6.	How will the project be implemented in areas with security issues e.g., Lamu and Boni Forest? How will you address the security issues and ensure our safety?	The project has prepared a Security Management Plan which provides guidance on managing security related concerns.
7.	Will there be disclosure of this ESMF after these consultations?	This ESMF and other related instruments will be disclosed on the websites of Ministry of Agriculture and Livestock Development and by the World Bank.
8.	Impacts associated with greenhouse gas emissions from dairy farming and mitigation measures have not been addressed. Consider biogas projects.	This is noted and will be included in the revised draft.
9.	Issue of pesticide container collections/disposals has not been included in the ESMF.	The adverse impacts associated with empty containers and their disposal have been described in the document including mitigation measures.
10.	Apiculture: What safeguards exist to manage pesticide use and ensure safety of beehive. Some pesticides that are used affect honey production, how will that be considered in the new project?	All sub projects using pesticides and implemented in areas where bee farming is undertaken will be required to conduct specific analysis on the potential impacts of the pesticides on bees and develop adequate mitigation measures including not using the chemicals and seeking other alternatives such as bio pesticides. The pesticides to be used in NAVCDP will be those that are friendly to pollinators with minimum effect on non- targeted organisms.

S/No	Concerns	Response
11.	Government has minimum wages for workers which may be too low and may not attract workers. How can ensure that workers (youth employment) are not paid this low minimum wage?	A labour management procedure has been prepared for the project and will provide guidance on all labour related issues and concerns during project implementation.
12.	What can be done concerning the high number of chemicals being used on the farms that negatively affects humans through compromised food safety issues?	NAVCDP Integrated Pest Management Framework will guide pesticide use at beneficiary level. Communities will be trained on safe use of chemicals and the management of pesticides, handling, storage, and transportation.
13.	How will the project help Vulnerable, and Marginalized Groups as defined by ESS7 to continue conserving the environment?	The project will continue implementing Sustainable Land Management activities in collaboration with the VMGs communities and KFS
14.	VMGs are surrounded by other communities and the project might not benefit them making them not respond which may in turn affect the VMGs and cause delays on coming up with responses.	VMGs will be targeted during project operation and their CIGs/VMGs/POs will be considered along those of majority communities.
15.	Encourage use of solar power in the FLIP to cut on the cost of energy and reduce pollution caused by use of fossil fuels.	Comments noted positively. NAVCDP will engage further.
16.	Some counties have no capacities on E&S. They go ahead and hire consultants who have no or very little expertise? How will this new project help control this gap?	Counties will be required to have qualified and experienced environmental and social safeguards specialist to handle environmental/social issues.
17.	Public Lands and ownership: when such lands are given to communities to invest; management issues crop up later and this affects the progress of such investments. How is land being handled in this project?	The land on which the project will be implemented will be fully documented and due diligence done. NLC will also be fully involved to ensure that public land is properly availed for FPO utilization.

4.2 Consultation and Information Disclosure on ESS Instruments and Plans

92) The draft ESS instruments - SEP, ESMF, IPMP, VMGF, GM, SMP, LMP, SEAH Prevention and Response Plan, and RPF - were discussed during a validation workshop. Availability of

the final documents were disclosed in the Ministry of Agriculture, NAVCDP and World Bank websites. Project brochures and updates have been posted on the appropriate sites. An easy-to-understand guide to the terminology used in the environmental and social reports or documents has also been made available online together with details about the GM and project contact information. NAVCDP continues to update and maintain the website regularly during project implementation, at least quarterly.

93) The NAVCDP disclosure process adopted in the release of project environmental and social safeguards documentation, including the SEP was undertaken as follows:

- i. Disclosure of ESMF, IPMP, VMGF, RPF, GM, SMP, LMP, SEAH Prevention and Response Action Plan, and SEP in public domain took place in February 2022 after World Bank approval;
- ii. Public consultation meetings with PAPs and other stakeholders were held to present and discuss findings of the ESMF and measures proposed in the ESMP, VMGPs, LMP and RAPs (as appropriate);
- iii. Public consultation meetings in project affected communities and with other stakeholders were held regularly as required to present and discuss the ESS instruments and measures proposed in the ESMPs and related implementation plans;
- iv. Subsequent and appropriate disclosures are being undertaken as the project and sub projects progress.

94) In line with SEP requirements, the draft ESS instruments were updated and realigned following recommendations from the 1st Implementation Support Mission (ISM) held on February 13 -17, 2023. The ISM identified project design adjustments that required modifications to the instruments. The revised instruments were subsequently redisclosed both in-country and on the World Bank external website to ensure transparency and accessibility for all stakeholders.

95) Table 8 outlines the different stakeholder categories, the types of project information shared with each group, and the specific communication and disclosure methods used to ensure inclusive, transparent, and culturally appropriate engagement throughout NAVCDP implementation.

Table 8: Stakeholder Engagement and Disclosure Methods

Category of Stakeholder	Project Information Shared	Means of communication/ disclosure
Beneficiary population in the project area.	ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, and SEP, GM. Regular updates on project development.	<ul style="list-style-type: none"> • Public notices. • Electronic publications and press releases on the project/Ministry website. • Hard copies displayed at designated public locations. • Press releases in the local media. • Consultation meetings.

Category of Stakeholder	Project Information Shared	Means of communication/ disclosure
		<ul style="list-style-type: none"> • Information leaflets and brochures. • Separate focus group meetings with vulnerable groups, as appropriate.
NGOs and CBOs	ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, and SEP, GM. Regular updates on project development.	<ul style="list-style-type: none"> • Public notices. • Electronic publications and press releases on the project/Ministry website. • Dissemination of hard copies at designated public locations. • Press releases in the local media. • Consultation meetings. • Information leaflets and brochures.
Government authorities and agencies	ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, and SEP, GM. Regular updates on project development. - Additional project information, if required for the purposes of regulation and permitting.	<ul style="list-style-type: none"> • Dissemination of hard copies of the ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, SEP and GM. • Project status reports. • Meetings and roundtables.
Related businesses and enterprises	SEP and GM Updates on project development and tender/procurement announcements.	<ul style="list-style-type: none"> • Electronic publications and press releases on the project website. • Information leaflets and brochures. • Procurement notifications.
Project Employees	-Employee Grievance Redress Mechanism -Updates on project development.	<ul style="list-style-type: none"> • Staff handbook. • Email updates covering the Project staff and personnel. • Regular meetings with the staff.

Category of Stakeholder	Project Information Shared	Means of communication/ disclosure
		<ul style="list-style-type: none"> • Posts on information boards in the offices and on site. • Reports, leaflets.
VMGs	Sensitization followed by training on the project ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, SEAH Prevention and Response Plan, GM and SEP Implementation of the project activities	<ul style="list-style-type: none"> • Community/Beneficiaries' meetings. • Information through Brochures

4.3 Virtual Stakeholders Consultation on Child Labour - March 2022

96) On 16 March 2022, a virtual stakeholder consultation was convened to discuss child labour risks and mitigation measures relevant to NAVCDP implementation. The meeting brought together 20 participants (13 men and 7 women) representing the national and county institutions, including (Agriculture and Social Safeguards teams), World Bank, International Labour Organization (ILO), Food and Agriculture Organization of the United Nations (FAO), the Commissioner of Labour - Nairobi, the Directorate of Children Services, County Labour and Children's officers from Tana River, Meru, Homa Bay, and Machakos, as well as staff from NARIGP/NAVCDP. This engagement was national in scope, with participants drawn from Nairobi (national offices) and multiple counties, thereby combining policy-level expertise with local implementation perspectives.

97) Key issues discussed included the prevalence of child labour in agriculture, the impact of COVID-19 on household vulnerability, gaps in parental awareness regarding hazardous versus light work, and the need to strengthen institutional frameworks. Recommendations emphasized raising awareness on child labour and trafficking across prioritized value chains, aligning the Children's Act with labour regulations, and mainstreaming child labour prevention into project structures at both national and county levels.

98) Table 9 presents key issues discussed and recommendations proposed during the meeting. The participant's list for the stakeholder's forum is attached in Annex 3.

Table 9: Summary of Key Issues Discussed and Recommendations

S/No.	Participant	Comments	Recommendations
I	Faith Manyala	The number of children as at 2020 who experience child labor was 160M which is an increase of 8M from 2016.	Preparation of mitigation measures in advance

S/No.	Participant	Comments	Recommendations
		70% of the case are within the agricultural sector and emphasized the importance of preparing the mitigation in advance.	
		Covid has affected the social economic status of most families intensifying child labor engagement in different forms to supplement the economic status of their household.	New project should address the economic recovery of children who were affected by Covid-19.
		There is lack of awareness on the parent's side in terms of what the law says on the difference of light work for children and hazardous work and agriculture is a common entry point for child labour	The project should emphasize on raising awareness on what entails child labor, forced labor and human trafficking on the 9 prioritized VCs.
2.	Christine Otieno	<ul style="list-style-type: none"> •There is an institutional framework, children act, the rules and regulations on hazardous work & light work for children- •National steering committee under the ministry of labor which is the apex policy body, county and sub county labour committers which is multi sectoral (inclusive of the church, NGOs and government departments.) 	Project should involve the state department to create awareness on the regulations
3.	Peter Kutere	The children's Act is under review.	It should address the discrepancy between the labour Act which puts employment at 16 whereas the children Act puts it at 18yrs.

99) The virtual meeting concluded that;

- i. The project would work with small holder communities; hence the severity of child labour risk was ranked as low.

- ii. The necessary structures for control of child labour were in place from National (National Steering committee on child protection) up to community level (Area Advisory Committee)
- iii. The project would incorporate the children and labour departments in the project structures at the National and County levels to ensure that child labour issues are mainstreamed into the decision-making processes.
- iv. Awareness creation for prevention of child labour at all the project levels would be a key topic in all the project activities from planning to implementation.
- v. Follow up discussions would be undertaken, preferably 3 months after the finalization of the LMP, to ensure that the child labour issues are well addressed in NAVCDP.

4.4 Stakeholders Engagement on Selection of Priority Value Chains - July 2023

100) A stakeholder engagement exercise was undertaken during priority value chain selection with county representatives from all the 33 Counties, from the 24th to 28th July 2023. Key concerns and project responses are presented in Table 10.

Table 10: Value Chain Selection Stakeholder Concerns and Project Responses

VALUE CHAIN	STAKEHOLDER CONCERN	PROJECT RESPONSE
AVOCADO	Why was Tharaka Nithi left out of the avocado analysis, yet it is an avocado-growing area?	Areas within the Mt Kenya region where Tharaka Nithi falls are suitable for the crop. NPC to share with counties the presentation showing areas mapped for avocado production.
	Were the figures presented for certified and uncertified varieties? Which varieties should be promoted?	The figures were export figures for all varieties of which 80% were for the Hass variety followed by Fuertes. The main export market is western Europe. There is however a high potential for Fuerte in Eastern Europe.
APICULTURE	Apiculture can't be integrated with livestock farming in areas where farmers have small parcels of land because of the risk of bees attacking livestock or people. How far are we at national level in introducing stingless bees?	Bees sting as a last resort when provoked. Ensure clear separation of bees from humans and livestock. Site apiaries away from livestock and public spaces to avoid disturbances. Fence off to avoid constant human and livestock interference. Avoid bees if the area has small parcels of land. Stingless bees cannot replace the African killer bee because they yield about 3-4 kg of honey a year, they are therefore not as economical as the African bee.

VALUE CHAIN	STAKEHOLDER CONCERN	PROJECT RESPONSE
	Why is the country restricted to export honey to European markets, what is being done to reverse the situation?	<p>In 2018 Kenya Honey was delisted in the European market due to lack of capacity to demonstrate quality assurance. Currently the livestock bill is looking at ways of registering producers and other actors.</p> <p>This will enable the government to come up with residue monitoring plans that demonstrate quality assurance.</p>
COFFEE	What is the role of the millers and the marketers?	<p>Currently 80% of millers are underutilized and require interventions to fit in the market. Different Millers charge different rates for milling and in 2020, there were regulations that proposed to cap the milling charges.</p> <p>In some cases, millers are also marketers/brokers therefore there is need for policy guidelines on the same. There is a lot of interest on coffee from the government and licenses to millers have been temporarily halted and consultation between government and millers is ongoing to streamline the sector.</p>
	One county requested for 400 seedlings and had not yet received	The affected county to provide details of the request for follow up. There were 450 bags of seed ear marked to be supplied in phases to the counties.
COTTON	Counties enquired where to source for Hybrid seeds for planting	<p>The licensed Hybrid seed suppliers were given as: a) Seed works and b) Eco Kenya. The two sources have both BT and Non-BT hybrids. The contacts for the two suppliers would be shared with the counties.</p> <p>Amiran withdrew their interest in seed supply.</p> <p>KALRO was in the process of capacity building to produce enough seed for the country</p>
PYRETHRUM	Which institution can domicile a testing lab for pyrethrum? Do testing labs exist?	Processors do testing and analysis for the farmers. If a lab were to be set up for analysis KALRO or AFA would be recommended, but preferably KALRO as

VALUE CHAIN	STAKEHOLDER CONCERN	PROJECT RESPONSE
		an autonomous body. Currently AFA does the analysis on a low scale for some production areas through the processors and has internal data on the same.
COTTON & PYRETHRUM POLICIES	What are the policies and regulations concerning the two crops?	<p>The Crops Act and AFFA Act are in place. The Fibre Crops Policy is yet to be finalized although the process is ongoing. The current policy on cotton only covers the lint therefore there is need to review the policy to cover seed and its products.</p> <p>On Pyrethrum the Crops and AFFA Regulations are in place. Pyrethrum Regulatory Act was repealed to allow other actors to process the crop removing the monopoly from Pyrethrum Board of Kenya (PBK). Currently there are 4 processors who are registered and licensed to process and export pyrethrum products.</p> <p>PBK which became Pyrethrum Processing Company became one of the processors.</p>
PETs	There are many value chains to be promoted under PET yet the budget is not clear even though Agriculture is devolved. Could the PETs team comment on the issue.	PET does not implement Projects they only track and monitor on the pledges made by the president. For example, KALRO and AFFA have budgets to support seed production, while the Ministry of water have budgets to expand irrigation schemes so PETs monitor how the resources are used, they do not interfere with implementation activities.
OTHER VALUE CHAINS	Why was analysis missing for other value chains?	This was due to time constraint but the analysis will be done and be made available to the counties.

Plenary Discussion

101) Table 11 presents a summary of key issues raised and the project's responses during the Plenary Discussion. The list of value chains prioritized at Counties is presented in Table 12.

Table 11: Stakeholder Concerns Raised during Plenary Discussion

ISSUE	Response
<p>How is the resource envelope done? Is it scientifically analysed?</p> <p>Some counties have more wards than others yet the resource envelope is the same.</p>	<p>All counties are treated equally because the number of wards per county does not correspond to the size of the county, population or productivity.</p> <p>The project operates on reimbursable basis, therefore after initial allocation; efficient counties in terms of implementation receive more resources than the less efficient ones.</p>
<p>Can one county fall in more than one cluster.</p>	<p>The issue of dynamic and static clusters has been discussed and it was agreed that the focus should be on static clustering to avoid confusion however a review can be done on case by case</p>
<p>Migori and Homabay had prioritized cotton and shared a cooperative society this time Migori has dropped cotton so what will happen to the cooperative society</p>	<p>HB and Migori counties advised to renegotiate</p>
<p>The 10% threshold for clustering, was it advisory or decided through a scientific process</p>	<p>This was a chosen threshold as it's a strong indicator for commercially viable value chains</p>
<p>The meeting sort clarification on whether chicken value chain referred to Indigenous chicken only or the other poultry as well.</p>	<p>According to the PAD, the VC to be promoted is Indigenous Chicken</p>
<p>The Middlemen in the Avocado value chain seem to benefit more than the farmer</p>	<p>The project is promoting marketing channels through cooperatives to avoid exploitation of farmers</p>
<p>There was a clarification that the figures given for pyrethrum were for Nyamira County and not Kisii County. Nyamira enquired whether Pyrethrum could be included as a sixth Value chain.</p>	<p>It was clarified that the number of value chains to be supported by the project per county was 5. Therefore, Nyamira could either drop one value chain and take up pyrethrum or leave it out.</p>
<p>What would happen to single value chain counties that were supported under NARIGP and KCSAP?</p>	<p>The project would not support single county value chains as commercialization requires large quantities of produce that enable processing. Those VC would have to be renegotiated.</p>
<p>Can potatoes and tomatoes be considered as vegetables so that</p>	<p>This was the original concept but after more analysis it was decided that the value chains be treated as a</p>

ISSUE	Response
within one county they can be promoted as vegetables	separate value chain as their processing requirements are different. However, this is subject to review
What will happen to investments already supported by NARIGP and KSCAP but now dropped in NAVCDP.	They will be taken up by the county government, other projects and PPP
Clarify VC selection inconsistency between the National VC Lead and NPC. The Lead said that 4 VCs from the previous projects must be retained. NPC said to consider the community, governor's manifesto, and regional and national agenda in the selection.	There was no contradiction between NPC and National VC lead. The project was moving to more counties, and certain changes were expected. However, due to time constraints, the project could not start with new VCs across the board. Out of the 4 VCs, Counties were expected to retain as many of them as possible for continuity. A county could drop only one VC for justifiable reasons, as starting afresh for all 5 VCs would be a considerable burden. The four must be within the 12 prioritized VCs. The 5th VC could be chosen from within or outside the 12. No county would have a VC not selected by any other county. The prioritized VC under the previous projects had been selected by communities and were aligned to the county CIDPs.
What happens to Wards that are part urban and part rural?	Ward-neutral - counties may not have technologies for farming in fully urban areas. There are variations across counties; in some counties, wards were delineated to have both Urban and Rural spaces, such as in Uasin Gishu county. Fully urban wards cannot undertake significant agricultural activity and have an impact. Mobilization would be a challenge, and the wards would lag behind. The threshold is 40% - technical teams will guide.
<p>General Comments</p> <ul style="list-style-type: none"> • Although counties have selected chicken, the numbers kept by farmers were too low and uneconomical. This issue needs to be revisited. • The dairy infrastructure has been improved by the Ministry through the provision of cooling facilities. Therefore, there is plenty of milk available for the market. As a country we need to think value addition and export products such as milk powder to countries such as DRC Congo and other African countries where there is a milk deficit. 	

Table 12: List of Prioritized Value chains at the Project Counties

CLUSTERS	COUNTY	PRE-SELECTED VALUE CHAIN	FINAL VALUE CHAIN SELECTED
CUSTER I	Busia	Cotton Dairy Banana Poultry Ground nuts	Cotton Dairy Rice Poultry Banana
	Siaya	Apiculture Tomato Poultry Cotton Avocado	Apiculture Tomato Poultry Cotton Rice
	Kisumu	Dairy Poultry Rice Tomatoes Cotton	Dairy Poultry Rice Tomatoes Cotton
	Homabay	Cotton Dairy Coffee Poultry Banana	Cotton Dairy Rice Coffee Banana
CLUSTER 2	Nandi	Dairy Chicken Avocado Irish potato Coffee	Dairy Chicken Coffee Irish potato Avocado
	Uasin Gishu	Dairy Irish potato Chicken Coffee Avocado	Dairy Chicken Irish potato Coffee Avocado
CLUSTER 3	Bomet	Dairy Chicken Irish potato Banana Avocado	Dairy Chicken Avocado Irish potato Pyrethrum
	Kericho	Dairy Chicken Banana Coffee Avocado	Dairy Chicken Avocado Pyrethrum Coffee
	Narok	Dairy Chicken Avocado Irish potato Tomato	Dairy Chicken Avocado Irish potato tomato
CLUSTER 4	Kisii	Banana	Dairy

		Chicken dairy Avocado Coffee	Chicken Banana Coffee Avocado
	Nyamira	Local Vegetables Chicken banana Dairy Coffee	Dairy Local Vegetables Banana Coffee Avocado
	Migori	Chicken Dairy Apiculture Tomatoes Banana	Dairy Chicken Apiculture Banana Tomato
CLUSTER 5	Kakamega	Dairy Indigenous chicken banana Avocado Apiculture	Dairy Indigenous chicken banana Avocado Apiculture
	Bungoma	Chicken Dairy Banana Avocado Beans	Chicken Dairy Banana Avocado Coffee
	Vihiga	Chicken Dairy Banana Avocado Local vegetables	Chicken Dairy Banana Avocado Local vegetables
CLUSTER 6	Kiambu	Dairy Potato Banana Chicken Coffee	Dairy Chicken Banana Avocado Coffee
	Murang'a	Dairy Chicken Avocado Coffee Banana	Dairy Chicken Avocado Coffee Mango
	Nyeri	Coffee Dairy Potato Banana Chicken Beans	Coffee Dairy Potato Banana Avocado
	Kirinyaga	Dairy Avocado Tomato Chicken	Dairy, Avocado Tomato Banana

		Coffee	Coffee
CLUSTER 7	Meru	Banana Irish potato Avocado macadamia	Dairy Banana Irish potato Chicken Avocado Coffee
	Embu	Dairy Mango Green gram Coffee chicken	Dairy Apiculture Mango Coffee Avocado
	Tharaka Nithi	Dairy Chicken Green grams Banana Coffee	Dairy Chicken Green grams Banana Coffee
CLUSTER 8	Machakos	Dairy Chicken Pigeon peas Green Grams	Dairy Avocado Coffee Tomato Chicken
	Makueni	Mango Green grams tomato Chicken	Mango Dairy Tomato Chicken Apiculture
	Kitui	Mango Green Grams Chicken Apiculture	Mango Green grams Tomato Chicken Apiculture
	Narok	Dairy Tomato Chicken Potato	Dairy Tomato Chicken Potato Avocado
	Kajiado	Dairy tomato beef shoats	Dairy Tomato Chicken Apiculture Mangoes
CLUSTER 9	Nakuru	Dairy apiculture Chicken Potato	Dairy Apiculture pyrethrum Chicken Potato
	Nyandarua	Dairy	Dairy

		Potato Garden peas Chicken	Indigenous veg Chicken Potato Pyrethrum
CLUSTER 10	Taita Taveta	Dairy Beef Green grams Chicken Potato	Dairy Chicken Green grams Potato Banana
	Kilifi	Dairy Tomato Apiculture Coconut	Dairy Apiculture Mango Cashew nut Chicken
	Kwale	Apiculture Tomato Dairy Green grams	Apiculture Tomato Mango chicken Cashew nut

4.5 Stakeholder Consultation Forum - February 2024

102) A total of 116 stakeholders attended the consultation forum held on 12 February 2024, comprising 82 men and 34 women. During the forum, participants raised a range of questions and concerns related to project implementation, resource allocation, value chain selection, the Agripreneur (AP) model, and SACCO operations. These issues were discussed in plenary and are summarized in Tables 13 and 14.

Table 13: Stakeholder Concerns and Project Responses -12 February 2024

ISSUE	RESPONSE
<i>Funds transfer</i> There are no more funds yet several groups had been approved for funding.	There has been a challenge in disbursement because the framework has not been approved by the senate and parliament. No money has been released for the entire financial year, and it was not clear when the framework will be approved. We are waiting for parliament to resume.
Approval of ceiling	Teams had been given a chance to review projects that had been submitted. Recommendations were given for improvement of the BoQs to facilitate implementation of the new ceiling. However, subprojects with 10m approvals need not to increase the ceiling to the now revised 20m ceiling.
Role of CDDCs	The role of CDDCs will be diminishing as they are currently being restructured to help in promoting SACCOs by becoming members. Each CDDC will have about 8 members from the previous 17. The model for sustainability of CDDCs will be shared with the counties.

ISSUE	RESPONSE
Shariah compliance for SACCOs	SACCOs will be Shariah compliant for counties that observe Muslim religion. Shariah compliance has been affected in Wajir, Isiolo and embedded in the by-laws of SACCOs.
Staffing of SACCOs	There was a commitment to support SACCOs with book keepers and accountants as most of the people running the SACCOs lack relevant skills, which might compromise the management of the resources. There is a capacity building plan for the SACCOs and counties will have competent staff by the time the roll out is done.
Grants to SACCOs	<p>For NARIGP and KCSAP, 20 million was given to groups to demonstrate TIMPs, which the farmers were expected to transfer to their farms. However, only 24-30% transferred due to financial limitations. In order to translate into profitability, SACCOs that enable farmers to access finances almost immediately are the better option. This approach has been successful in 11 counties where farmers have managed to increase their savings. Each SACCO will receive a revolving fund given as a matching grant. Some counties have all the SACCOs they need. In essence two grants will go to each SACCOs: i) inclusion grant for the setting up and the automation. No SACCO will start without automation because that would pose a challenge in financial management. ii) matching grant.</p> <p>More discussions are needed as we need the support of CECs. Some counties are setting up SACCOs quickly while others lag behind.</p> <p>Nyeri is one of the pilot counties for the matching grant model. 3 SACCOs have received up to 3.5 million which indicates growth.</p>
Value chain misalignment	<p>Siaya selected cotton and rice as the priority VCs, yet the farmer registration data showed that only a few farmers grow these crops.</p> <p>Affected counties were advised to utilize the second widow of opportunity for VC selection and prioritization and ensure that the VCs selected are informed by available data.</p>

ISSUE	RESPONSE
Agripreneur model	Counties are overstretched in terms of demand for extension services. The AP model involves peer to peer learning where youths render services as a business within the community, which has been shown to be effective. The youth to be involved must have an agriculture background and will be issued a soil testing kit and supported for 6-12 months. The model is developed but needs to be discussed and embed in the legal framework as it is already acceptable. The ratio of APs to farmers across all wards will be 1:500 and the APs will support data collection on an ongoing basis. Dr. Guto will fast track the finalization of the model.
Resource allocation	Resources will be uniformly allocated across counties in the first year; each county will receive an equivalent KES. It is expected that those with more wards will absorb faster and once they account for it, they will receive more. The resources will be issued on reimbursement basis.
FLID	Each county needs to establish an irrigation unit to help the county to realize food security agenda. Counties however require political goodwill
County database access	Every county will nominate two people to be trained on data protection. These individuals will then be given viewership rights only.
Business accelerators	Business accelerators will be engaged per VC from the national level and will support all counties based on the value chain that they are supporting

Table 14: Summary of Issues Raised and Project Responses -12 February 2024

ISSUES RAISED	PROJECT RESPONSES
Review and Standardization of the Agripreneur Model	<ul style="list-style-type: none"> • To hold a consultative meeting to review the model and institutionalize it within the Extension Legal framework • To interrogate the qualifications needed for the agripreneurs, and the range of support Agripreneurs will offer to SACCOs, alongside supporting farmers • Review the required code of conduct to comply with data protection guidelines

ISSUES RAISED	PROJECT RESPONSES
Launch	<ul style="list-style-type: none"> • Presidential launch on 1st June 2024 – Madaraka Day. Will mark the beginning of the rollout exercise.
Rollout and AP mentorship	<ul style="list-style-type: none"> • Will run between June to December 2024 • To provide structured mentorship tailored to the needs of each county • Bungoma will be incorporated in the development of the operations manual • Project coordinators to come up with the model • CECs to provide firm guidance on AP selection to avoid infiltration from the political class
Performance review of the APs	<ul style="list-style-type: none"> • To assess the APs on their performance in December 2024 as the indicator of success
KIAMIS data access training	<ul style="list-style-type: none"> • Each county to nominate two people for training on data access and safety by 16th Feb 2024 • Will be guided on data protection to prevent unofficial access and will then access on read only basis.
Project Approach	<ul style="list-style-type: none"> • There would be continued emphasis on universalization. The focus of the project would be on small holder farmers and every project farmer would belong to a CIG, FPO and a SACCO. • There would be a lead farmer through whom TIMPs to the communities would be transferred to from
KALRO.	<ul style="list-style-type: none"> • KALRO will play a role of ensuring all farmers have access to quality inputs, market access, and training through the FFS model.
Approach	<ul style="list-style-type: none"> • Generally, the approach would use the saturation model to cover all wards in the project counties, unlike KCSAP and NARIGP, which covered a limited number of wards per county. • Comprehensive service delivery for profitability and resilience by scaling-up from 641 wards to all wards and deepening to 5 million farmers accessing all services through a phased implementation approach. • Embrace agripreneur approach
	<ul style="list-style-type: none"> • Shift from grants to revolving funds as this was more sustainable in the long run. micro-projects

ISSUES RAISED	PROJECT RESPONSES
	would be discouraged and matching grant be issued to SACCOs and FPOs.
Number of Counties	<ul style="list-style-type: none"> The number of counties implementing the NAVCDP project had been expanded to 33 counties from 26. The additional Counties are Nyamira, Vihiga, Bungoma, Kisumu, Siaya, Kajiado, Tharaka Nithi

4.6 Stakeholder Consultation Forum on Additional Financing - January 2026

- I03) On Wednesday, 21 January 2026, NPCU convened a national stakeholder consultation forum at the Burch's Resort, Naivasha, as part of the process to update the SEP for the proposed AF to the NAVCDP. The purpose of the consultation was to disclose information on the proposed AF, present updates on the Project's expanded scope and components, and obtain stakeholder feedback to inform project implementation and environmental and social risk management arrangements.
- I04) The consultation brought together 83 stakeholders (50 men and 33 women), representing a wide range of stakeholder groups, including lead farmers, FPO and SSCCO management representatives, Indigenous Peoples representatives, CPCUs/NPCU personnel, the project's Panel of Experts (PoEs), private sector actors and relevant national government institutions. The diversity of participants ensured representation across value chains, counties, and stakeholder categories, including vulnerable and marginalized groups.
- I05) Stakeholders were informed of the rationale for the AF, which seeks to address financing gaps arising from the expanded scope of NAVCDP, including the introduction of additional value chains, strengthened market access and commercialization interventions, and the urban food systems component. The Project clarified that the AF is a top-up to the existing NAVCDP rather than a new project, and that implementation will continue to be guided by the community-driven development approach and county-specific value chain strategies.
- I06) Key issues raised during the consultation related to:
- i. the pace and sequencing of implementation for newly introduced value chains, including delayed demonstration activities;
 - ii. market access constraints, particularly the need for storage, aggregation, mechanization, and value-addition infrastructure;
 - iii. concerns regarding the effective flow of project resources to community-level investments;
 - iv. inclusion of Indigenous Peoples and other vulnerable groups, including the need for affirmative action and targeted support;

- v. environmental and social risks, such as agrochemical use, land access for demonstration plots, and potential economic displacement; and
 - vi. clarity on the role of private sector actors and service providers in supporting commercialization outcomes.
- 107) In response, the Project reaffirmed that implementation under the AF will be guided by value chain strategies and county-level implementation plans, which will define priority investments, timelines, and sequencing. The Project confirmed that environmental and social risks will continue to be managed in accordance with the Environmental and Social Framework instruments, including the ESMF, VMGF, RPF, IPMF, LMP, and GBV SEA/SH Prevention and Response Plan. The Project further emphasized that physical displacement is excluded, that voluntary land access for project activities will be managed in line with the RPF, and that Indigenous Peoples and other vulnerable groups will benefit from targeted inclusion measures, including prioritization under inclusion grants.
- 108) Stakeholder feedback obtained during the consultation will inform ongoing implementation, preparation of detailed guidance notes, and follow-up through established coordination platforms at national and county levels. Issues requiring clarification or additional action will continue to be addressed through routine stakeholder engagement and the Project’s Grievance Mechanism. Detailed records of the consultation, including participant lists and verbatim comments, are provided in Annex 5a - 5d.

4.7 Information Disclosure

- 109) Information Access to and disclosure of information is central to NAVCDP transparency, accountability, and stakeholder engagement. Information will continue to be packaged and shared with key stakeholders through multiple channels to ensure timely, accessible, and meaningful consultations. The NPCU, through the Ministry of Agriculture and Livestock Development, is responsible for ensuring that project-related information reaches stakeholders promptly. Feedback received is incorporated to strengthen the consistency, quality, and robustness of information flow.
- 110) Following the Stakeholders Engagement workshop on AF, NAVCDP will redisclose updated safeguards instruments across all 34 counties, disseminate the Social Assessment report, and hold county-level follow-up sessions to address specific value chain and mechanization concerns. NPCU will also strengthen grievance redress awareness, ensure transparent reporting of AF allocations and expenditures, and integrate stakeholder priorities into implementation planning to maintain inclusive, responsive engagement under ESS10.
- 111) Table 15 below summarizes the information disclosure plan at different stages of the project cycle, outlining what information will be shared, the methods of dissemination, target stakeholders, and responsible parties.

Table 15: Information Disclosure Plan at Different Stages of the project Cycle

Information to be disclosed	Method used	Target stakeholders	Responsibilities
Before appraisal			
Disclosure of project document (PAD, SEP, ESCP, ESRS)	<ul style="list-style-type: none"> • Websites - MoALD and WBG • Brief summaries of the main features of the project SEP, 	All stakeholders	NPCU
After appraisal			
Publicity on project approval and roll-out plans	<ul style="list-style-type: none"> • Audio-visual messages on project information (radio, TV in different local languages) • Newspaper stories /supplements • Printed materials on project information • Social Media (Twitter, Facebook, Instagram, WhatsApp) • Emails • Press releases • Speeches • Websites (FGS and FMS, WBG) • Meetings • Workshops 	All stakeholders	NPCU
Disclosure of the project documents ESMF, IPMP, RPF, VMGF, Updated SEP, LMP, GBV Protection and Response Action Plan	<ul style="list-style-type: none"> • Websites - MoALD and WBG • Brief summaries of the main features of the project SEP • Audio-visual messages on the project (radio, TV in different languages) • Newspaper stories/supplement • Social media (twitter, Facebook, Instagram WhatsApp) • Emails 	<ul style="list-style-type: none"> • MoALD and all partners involved in the project • Open access to all interested parties • Distribution of printed flyers to schools and other institutions 	<ul style="list-style-type: none"> • NPCU • WBG Team

Information to be disclosed	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> • Press releases • Speeches • Meetings • Workshops • 		
During implementation			
Roll-out of direct support to SACCOs CDDCs agro pastoralists, pastoralists and livestock herders.	<ul style="list-style-type: none"> • Key informant interviews with key stakeholders • Community discussions (through public meetings and call-in radio sessions/activations) • Newsletters • Newspaper stories/supplement • Social media (twitter, Facebook, Instagram WhatsApp) • Emails) • Press releases • Speeches • Mobile phone block messages • Meetings • Workshops 	<ul style="list-style-type: none"> • Farmers • Farmer Producer Organizations (FPOs) • Communities' organization • Communities • Implementing partners • SACCOs • CDDCs • CIGs/VMGs 	<ul style="list-style-type: none"> • NPCU • Communication Expert • Environment and Social Safeguards Officers
Highlights on project activities, achievements and lessons learned	<ul style="list-style-type: none"> • TV/Radio spots/activations and announcements • Print materials (newsletters and flyers) • Newspaper stories/supplement • Social media (twitter, Facebook, Instagram WhatsApp) • Emails • Press releases • Speeches 	<ul style="list-style-type: none"> • -Project beneficiaries (learners, teachers, CECs) • Implementing partners • Other interested parties 	<ul style="list-style-type: none"> • Communication Expert • Environment and Social Safeguards Officers

Information to be disclosed	Method used	Target stakeholders	Responsibilities
	<ul style="list-style-type: none"> • Mobile phone block message • Meetings • Workshops • 		
Update on project process	<ul style="list-style-type: none"> • Print materials (newsletter, flyers, etc.) • Project progress reports • Meetings • Workshops • 	All stakeholders	NPCU
Complaints/Compliments about the project implementation	Logs and reports from the national GM focal person, State GM focal persons (GM complaints points in communities, and project areas	<ul style="list-style-type: none"> • Receivers of information and services • Information or Data managers 	<ul style="list-style-type: none"> • NCPU • Environment and Social Safeguards Officers
	Surveys and direct observations of the project beneficiaries	<ul style="list-style-type: none"> • Different stakeholders • Vulnerable populations 	<ul style="list-style-type: none"> • Communication Officer • M&E Officer
Monitoring and reporting			
Feedback of effectiveness of different modalities of engagement	<ul style="list-style-type: none"> • Semi-structured interviews • Online surveys • Satisfaction surveys • Focus group Discussions (FGD) 	Project primary beneficiaries	<ul style="list-style-type: none"> • MoALD • Safeguards Officers • M&E Officer
Quarterly	Progress report including summaries of complaints and resolution	<ul style="list-style-type: none"> • MoALD, offices at the national and county level offices • Implementing partners 	M&E officer

112) The MoALD and the NCPU will provide stakeholders with appropriate background information and relevant technical materials in a timely manner. Where stakeholder feedback is required, information will be shared with sufficient advance notice (7-10 business days) to allow adequate time for review and preparation, thereby enabling meaningful and informed participation.

113) A summary of the planned stakeholder engagement activities under NAVCDP, including target groups, key topics, engagement methods, frequency, and responsible institutions, is presented in Table 17.

Table 16: Planned Stakeholder Engagement Activities for NAVCDP

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	<p>PAPs</p> <ul style="list-style-type: none"> - People potentially affected by land acquisition - People residing in project area - Vulnerable households 	<ul style="list-style-type: none"> - ESMF/ESMP, IPMP, VMGF, RPF, SMP, LMP, GBV/SEA/H Action Plan, GM and SEP - Land acquisition process <ul style="list-style-type: none"> - Assistance in gathering official documents for authorized land uses - Compensation rates, methodology - Compensation packages - Project scope and rationale - Project benefits and target - Project E&S principles - Resettlement and livelihood restoration options - Grievance mechanism process 	<ul style="list-style-type: none"> - Public meetings, separate meetings for women and vulnerable - Face-to-face meetings - Virtual meetings - Mass/social media communication (as needed) - Disclosure of written information: brochures, posters, flyers, website - Information boards or desks - In-County Grievance Mechanism <ul style="list-style-type: none"> - NAVCDP monthly newsletter - For the vulnerable communities, the message will be packaged in a culturally acceptable manner and language through the FPIC approach - Radio and television 	<ul style="list-style-type: none"> - In County disclosure for Drafts on ESMF / ESMP, IPMP, VMGF, RPF, SMP, LMP, SEAH Action Plan, GM, and SEP once. - Continuous communication through mass/social media and routine interactions. - Throughout RAP development as needed 	<ul style="list-style-type: none"> - NAVCDP teams (County and National levels) - Specialists responsible for land acquisition - RAP consultant

Stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	Other Interested Parties (External) <ul style="list-style-type: none"> - County and CSOs in Kenya - Representatives in wards 	<ul style="list-style-type: none"> - ESMF, ESMP, RPF, VMGF, GM, SMP, LMP, SEP, disclosures - Land acquisition process - Identification of land plots and uses - Resettlement and livelihood restoration options (if needed) - Project scope, rationale, and E&S principles - Grievance mechanism process 	<ul style="list-style-type: none"> - Face-to-face meetings - Virtual meetings - Joint public/community meetings with PAPs 	<ul style="list-style-type: none"> - Throughout RAP development as needed - Project launch meetings in Counties. - Quarterly meetings in affected Wards and Counties. - Disclosure meetings in Counties and at national level. 	<ul style="list-style-type: none"> - NAVCDP E&S Team - Specialists responsible for land acquisition and other Panel of Experts (PoE) - RAP and VMGP consultant
	Other Interested Parties (External) <ul style="list-style-type: none"> - Press and media - NGOs 	ESMF, ESMP, RPF, VMGF, GM, SMP, LMP, SEP, RAP disclosures <ul style="list-style-type: none"> - Grievance mechanism 	<ul style="list-style-type: none"> - Public meetings, trainings / workshops (separate meetings specifically for women and 	<ul style="list-style-type: none"> - Project launch meetings in County - Meetings in affected 	<ul style="list-style-type: none"> - NAVCDP team
	<ul style="list-style-type: none"> - Businesses and business organizations - Workers' organizations - Academic institutions - National Government Ministries - Kenya Government Departments 	Project scope, rationale and E&S principles	vulnerable as needed) <ul style="list-style-type: none"> - Mass/social media communication - Disclosure of written information: Brochures, posters, flyers, website. - Information boards or desks in County - Grievance mechanism - Notice board for employment recruitment 	wards and County as needed <ul style="list-style-type: none"> - Communication through mass/social media (as needed) - Information desks with brochures / posters in affected wards (continuous) 	

	<ul style="list-style-type: none"> - General public, jobseekers 				
	<p>Other Interested Parties (External)</p> <ul style="list-style-type: none"> - Other Government Departments from which permissions / clearances are required. - Other project developers, donors 	<ul style="list-style-type: none"> - Legal compliance issues - Project information scope and rationale and E&S principles - Coordination activities - Land acquisition process - Grievance mechanism process - ESMF/ESMP/VMGF/SEAH ACTION PLAN/RPF/SEP disclosures 	<ul style="list-style-type: none"> - Face-to-face meetings - Invitations to public / community meetings - Submission of required reports 	<ul style="list-style-type: none"> - Disclosure meetings - Reports as required 	<ul style="list-style-type: none"> - NAVCDP team
	<p>Other Interested Parties (Internal)</p> <ul style="list-style-type: none"> - Other NAVCDP staff - Supervision Consultants - Supervision contractors, sub-contractors, service providers, suppliers, and their workers. 	<ul style="list-style-type: none"> - Project information: scope and rationale and E&S principles - Training ESMF/ESMP requirements and other ESS management plans - Grievance mechanism process - E&S requirements - Feedback on consultant/ contractor reports 	<ul style="list-style-type: none"> - Face-to-face meetings - Trainings/workshops - Invitations to public / community meetings 	<p>As needed</p>	<ul style="list-style-type: none"> - NAVCDP team

	<p>PAPs</p> <ul style="list-style-type: none"> - People potentially affected by land acquisition - People residing in project area - Vulnerable households/persons 	<ul style="list-style-type: none"> - Grievance redress mechanism - Health and safety impacts. - Employment opportunities - Project status 	<ul style="list-style-type: none"> - Public meetings, open houses, trainings/workshops - Separate meetings as needed for women and vulnerable - Individual outreach to PAPs as needed - Disclosure of written information: brochures, posters, flyers, website - Information boards in Counties - Notice board(s) at construction sites - Grievance mechanism - NAVCDP monthly newsletter 	<ul style="list-style-type: none"> - Quarterly meetings during construction seasons - Communication through mass/social media as needed - Notice boards updated weekly - Routine interactions - Brochures in local offices 	<ul style="list-style-type: none"> - NAVCDP management team - Supervision and RAP consultants - Contractor /subcontractors
	<p>Other Interested Parties (External)</p> <ul style="list-style-type: none"> - Governmental committees for land use and compensation - County and representatives in Wards 	<ul style="list-style-type: none"> - Project scope, rationale and E&S principles - Grievance mechanism - Project status - World Bank compensation requirements 	<ul style="list-style-type: none"> - Face-to-face meetings - Joint public/community meetings with PAPs 	<p>As needed (monthly during construction season)</p>	<ul style="list-style-type: none"> - NAVCDP team - Supervision and RAP consultants - Contractor /subcontractors
	<p>Other Interested Parties (External)</p> <ul style="list-style-type: none"> - Press and media - NGOs - Businesses and business organizations 	<ul style="list-style-type: none"> - Project information - scope and rationale and E&S principles - Project status - Health and safety impacts - Employment opportunities 	<ul style="list-style-type: none"> - Public meetings, open houses, trainings / workshops - Disclosure of written information: brochures, posters, flyers, website, Information boards in County - Notice board(s) at construction sites 	<p>Same as for PAPs</p>	<ul style="list-style-type: none"> - NAVCDP team

	<ul style="list-style-type: none"> - Workers' organizations - Academic institutions - National Government Ministries and departments - General public, jobseekers 	<ul style="list-style-type: none"> - Environmental concerns - Grievance mechanism process 	<ul style="list-style-type: none"> - Grievance mechanism 		
	<p>Other Interested Parties (Internal)</p> <ul style="list-style-type: none"> - Other NAVCDP stakeholders - Supervision Consultants - Contractor, sub-contractors, service providers, suppliers, and their workers 	<p>Project information: scope and rationale and E&S principles</p> <ul style="list-style-type: none"> - Training on ESMF / ESMP requirements and other sub-management plans - Worker grievance mechanism 	<ul style="list-style-type: none"> - Face-to-face meetings - Trainings/workshops - Invitations to public / community meetings 	Daily, as needed	<ul style="list-style-type: none"> - NAVCDP team - Supervisors
	<p>Project Affected Persons:</p> <ul style="list-style-type: none"> - People residing in project area - Vulnerable households 	<ul style="list-style-type: none"> - Satisfaction with engagement activities and GM - Grievance mechanism process - Damage claim process 	<ul style="list-style-type: none"> - Outreach to individual PAPs - NAVCDP website - Grievance mechanism - NAVCDP newsletter 	<ul style="list-style-type: none"> - Outreach as needed - Meetings in affected County and Wards (as needed/requested) - Monthly (newsletter) 	<ul style="list-style-type: none"> - NAVCDP team
	<p>Other Interested Parties (External)</p> <ul style="list-style-type: none"> - Press and media - NGOs 	<ul style="list-style-type: none"> - Grievance mechanism process - Issues of concern - Status and compliance reports 	<ul style="list-style-type: none"> - Grievance mechanism - NAVCDP website - Face-to-face meetings - Submission of reports as required. 	As needed	<ul style="list-style-type: none"> - NAVCDP team & management

	<ul style="list-style-type: none">- Businesses and business organizations- Workers' organizations- Academic institutions- County Government Departments- General public,				
--	--	--	--	--	--

5. TRAINING AND CAPACITY BUILDING

- I14) NAVCDP has undertaken and will continue to undertake targeted training and capacity-building activities to support effective implementation of this SEP. These trainings are provided to staff whose professional duties involve interaction with external stakeholders, as well as to senior management responsible for oversight and decision-making.
- I15) Specialized training will be provided to project implementers and focal persons responsible for community grievance management, in line with the project Grievance Mechanism (GM). In addition, community-level implementation structures implementing have been sensitized and will continue to receive training on the operationalization of the GM, to ensure accessibility, responsiveness, and timely resolution of concerns.
- I16) Project contractors have received and continue to receive orientation on the GM and on core principles governing community engagement and interaction. The stakeholder engagement training program covers, among other areas, the training modules summarized in Table 17, which outline the key capacity-building themes and target groups supported under the project.

Table 17: Proposed Training Modules for Stakeholders

S/No.	Module	Target
1	Role of a stakeholder	All levels at PIA
2	Managing stakeholder interests	NAVCDP Management at NPCU and Sub CPCUs
3	Managing stakeholder participation	NAVCDP Management at NPCUs and CPCUs
4	Stakeholder negotiation skills	All levels at PIA
5	Effective communication skills	All
6	Building relationships for effective stakeholder engagement	All
7	Project GM and how it helps stakeholders	All
8	Project SACCOs	All
9	CDDCs	All
10	FPOs	All

6. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING NAVCDP STAKEHOLDER ENGAGEMENT ACTIVITIES

- I17) The Ministry of Agriculture and Livestock Development is the main implementing agency for NAVCDP and has overall responsibility for the execution of project activities, including implementation of this SEP. Adequate financial resources have been allocated for the implementation of the SEP and GM and are referenced during

preparation of annual and detailed workplans. NAVCDP is responsible for the procurement and distribution of project inputs, while the broader institutional and implementation arrangements are outlined in the NAVCDP ESMF.

- 118) The Ministry of Agriculture and Livestock Development Emergency Response Committee, chaired by the Cabinet Secretary, will provide stewardship and oversight of adherence to prevention and response protocols for pandemics and other emergencies during project implementation. The Committee draws guidance from the National Emergency Response Committee (NERC) and will support NAVCDP in the following areas: (i) coordination of project preparedness and response to pandemics , including engagement with stakeholders; (ii) coordination of capacity building for NAVCDP personnel, service providers, contractors, CIGs, VMGs, POs, and other stakeholders; (iii) mainstreaming prevention messaging during project engagements and forums; (iv) coordination of procurement and supply of pandemic preventive materials including (hand sanitizer, face masks, soap, gloves (where applicable)).
- 119) In the event of a pandemic or emergency, The National Emergency Response Committee at the Ministry of Agriculture and Livestock Development will provide technical guidance throughout the project implementation, including training and orientation of project management and implementers. The NPCU will report to the Committee, which in turn will report to NERC. The NAVCDP national team will support and county-level teams through training and guidance, while counties will cascade and relevant information and capacity-building activities to project beneficiaries at the county and community levels.

Social Inclusion

- 120) NAVCDP recognizes that VMGs (minority clans, internally displaced persons, populations in remote or conflict-affected areas, nomadic pastoralists, female-headed households, the elderly, illiterate persons, women, youth, single parents, and PWD) often face social, economic, and physical barriers that limit their effective engagement. Examples of barriers include inadequate financial resources, inaccessible consultation venues, social stigma, limited awareness, and cultural norms that undervalue their roles.
- 121) To In response to these barriers, NAVCDP has put in place targeted strategies designed to foster meaningful participation. These measures go beyond compliance with safeguard requirements, actively advancing social equity, transparency, and inclusive development outcomes. Key strategies include:
- i. Meetings are held in venues that accommodate PWDs and are geographically accessible to remote communities.
 - ii. Information is presented in clear, non-technical formats to engage illiterate participants and those with limited financial literacy.
 - iii. At least 50 percent of opportunities are reserved for women, with deliberate outreach to ensure representation across counties and value chains.

- iv. Diversity in staffing: Recruitment promotes inclusion of women, youth, and VMGs, consistent with the LMP and ESMF.
- v. Consultations with IPs and nomadic pastoralists is tailored to respect traditional structures and practices.

6.1 Stakeholder Engagement Methods, Tools and Techniques

122) Table 18 summarizes the methods and tools NAVCDP uses to engage stakeholders. It outlines the purpose, content, dissemination approach, target groups, and responsible units, ensuring transparent, inclusive, and culturally appropriate participation across all project activities.

Table 18: Stakeholder Engagement Methods, Tools and Techniques

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
Information Provision					
Distribution of printed public materials: leaflets, brochures, fact sheets	Used to convey information on the project and regular updates on its progress to local, county, and national stakeholders.	<ul style="list-style-type: none"> -Printed materials present illustrative and written information on Project activities, facilities, technologies, and design solutions, as well as impact mitigation measures. -Presented contents are concise and adapted to a layperson reader. Graphics and pictorials are widely used to describe technical aspects. -Information may be presented both in English and Kiswahili for local and national stakeholders and in English for international audience. 	<p>Distribution as part of consultation meetings, public hearings, discussions, and meetings with stakeholders, as well as household visits in remote areas.</p> <p>Placement at the offices of local administration and NGOs, libraries, and other public venues.</p>	<p>Households in project area.</p> <p>Communities of Kenya, as well as relevant stakeholders for the NAVCDP.</p>	NPCU/CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
Distribution of printed public materials: flyers, leaflets, newsletters/ updates	A newsletter or an update circular sent out to Project stakeholders on a regular basis to maintain awareness of the Project development.	Important highlights of project achievements, announcements of planned activities, changes, and overall progress.	Circulation of the newsletter or update sheet with a specified frequency in the Project Area, as well as to any other stakeholders that expressed their interest in receiving these periodicals. Means of distribution – post, emailing, texting, electronic subscription, delivery in person. The mailed material can be accompanied by enclosed postage-paid comment / feedback form that a reader can fill in a return to the Project’s specified address.	Households in Project Area. Public venues in Project Area – local administrations, libraries. Communities in project area	NPCU/CPCUs
Printed advertisement s in the media	Inserts, announcements, press releases, short articles, or feature stories in the printed media – newspapers and magazines	Notification of forthcoming public events or commencement of specific Project activities. General description of the Project and its benefits to the community.	Placement of paid information in local, county, and national printed media, including those intended for general reader and specialized audience	Community in project area	NPCU/CPCUs
Radio or television entries	Short radio programmes, video materials or	Description of the project, project development updates,	Collaboration with media producers that operate in the	Communities in project area	NPCU/CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
	documentary broadcast on TV.	solutions for impact mitigation. Advance announcement of the forthcoming public events or commencement of specific project activities.	counties and can reach local audiences.		
Visual presentations	Visually convey project information to affected communities and other interested audiences.	Description of the project and related solutions/impact management measures. Updates on project development.	Presentations are widely used as part of the public hearings and other consultation events with various stakeholders.	Affected communities in the project area, participants of the public hearings, consultations, rounds tables, focus group discussions and other forums attended by Project stakeholders. County governments and other governmental bodies.	NPCU/CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
Notice boards	Displays of printed information on notice boards in public places.	Advance announcements of the forthcoming public events, commencement of specific project activities, or changes to the scheduled process.	Printed announcements and notifications are placed in visible and easily accessible places frequented by the local public, including libraries, ward cultural centers, post offices, shop, local administrations.	Directly affected communities in the project area	NPCU/CPCUs
Information Feedback					
Information repositories accompanied by a feedback mechanism	Placement of project-related information and printed materials in dedicated / designated locations that also provide visitors and readers with an opportunity to leave their comments in a feedback register.	Various project-related materials, ESMF documentation, environmental and social action plans.	Deposition of materials in publicly available places (offices of local NGOs, local administrations, libraries) for the duration of a disclosure period or permanently. Audience is also given free access to a register of comments and suggestions.	Directly affected communities in the project area	NPCU
Dedicated telephone line (hotline)	Setting up a designated and manned telephone line that can be used by the public to obtain information, make enquiries, or provide feedback on the project. Initially, telephone numbers of project's	Any issues that are of interest or concern to the local communities and other stakeholders.	Telephone numbers are specified on the printed materials distributed to project stakeholders and are mentioned during public meetings. Project's designated staff should be assigned to answer and respond to the calls, and	Local communities within the project Area. Any other stakeholders and interested parties.	NPCU

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
	specialized staff can be shared with the public, particularly staff involved in stakeholder engagement, public relations, social and environmental concerns.		to direct callers to specialist experts or to offer a call-back if a question requires detailed consideration.		
Internet / Digital Media	<p>Launch of project website to promote various information and updates on the overall project, impact assessment and impact management process, procurement, employment opportunities, as well as on project's engagement activities with the public.</p> <p>Website should have a built-in feature that allows viewers to leave comments or ask questions about the project.</p> <p>Website should be available in two languages – Kiswahili for</p>	Information about project operator and shareholders, project development updates, health and safety, community relations, community updates, employment and procurement, environmental and social aspects.	<p>A link to the Project website should be specified on the printed materials distributed to stakeholders.</p> <p>Other on-line based platforms can also be used, such as web conferencing, webinar presentations, web-based meetings, Internet surveys / polls etc.</p> <p>Limitation: Not all parties / stakeholders have access to the internet, especially in the remote areas and in communities</p>	Affected communities, project stakeholders and other interested parties that have access to the internet resources.	NPCU (communication officer)

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
	the local and national audience, and in English for international stakeholders.				
Surveys, Interviews and Questionnaires	The use of public opinion surveys, interviews, and questionnaires to obtain stakeholder views and to complement the statutory process of public hearings.	Description of the proposed project and related solutions / impact management measures. Questions targeting stakeholder perception of the project, associated impacts and benefits, concerns, and suggestions.	Soliciting participation in surveys/interviews with specific stakeholder groups or communitywide. Administering questionnaires as part of the household visits.	Directly affected households in the Project Area of Influence. Other communities within the project Area of Influence.	NPCU/ CPCUs
Feedback & Suggestion Boxes	A suggestion box is used to encourage communities in the affected communities to leave written feedback and comments about the project. Contents of the suggestion box shall be checked by designated project staff on a regular basis to ensure timely collection of	Any questions, queries, or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during public meetings.	Appropriate location for a suggestion box should be selected in a safe public place to make it readily accessible for the community. Information about the availability of the suggestion box should be communicated as part of project's regular interaction with local stakeholders and beneficiaries.	Directly affected households in the project area. Other communities within the project area.	NPCU/CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
	input and response/action, as necessary.				
Consultation & Participation					
Public hearings	Project representatives, the affected public, authorities, regulatory bodies, and other stakeholders for detailed discussion on a specific activity or facility that is planned by the project and which is subject to the statutory expert review.	Detailed information on the activity and/or facility in question, including a presentation and an interactive Questions & Answers session with the audience.	Wide and prior announcement of the public hearing and the relevant details, including notifications in local, county and national mass media. Targeted invitations are sent out to stakeholders. Public disclosure of Project materials and associated impact assessment documentation in advance of the hearing. Viewers/readers of the materials are also given free access to a register of comments and suggestions that is made available during the disclosure period.	Directly affected communities in the project area of influence. Other communities within the project area. Communities in the project area.	NPCU/CPCUs
Household /Farm visits	Household/Farm level visits can be conducted to supplement the statutory process of public hearings,	Description of the project and related solutions / impact management measures.	Visits should be conducted by project's designated staff with a specified periodicity.	Directly affected in the project area.	NPCU/CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
	particularly to solicit feedback from community members and vulnerable persons who may be unable to attend the formal hearing events.	Any questions, queries, or concerns, especially for stakeholders that may have a difficulty expressing their views and issues during formal community-wide meetings.	Limitation: logistical challenges in reaching households/farms in remote locations.		
Focus Group Discussions and Round Table Workshops	Used to facilitate discussion on Project's specific issues that merit collective examination with various groups of stakeholders.	Project's specific activities and plans, design solutions and impact mitigation / management measures that require detailed discussion with affected stakeholders.	Announcements of the forthcoming meetings are widely circulated to participants in advance. Targeted invitations are sent out to stakeholders.	Directly affected households/farms in the project area, youth, elderly, women, and other vulnerable groups.	NPCU/ CPCUs
Information centres and field offices	Project's designated venue for depositing project-related information that also offers open hours to the community and other members of the public, with project staff available to respond to queries or provide clarifications.	Project-related materials. Any issues that are of interest or concern to the local communities and other stakeholders.	Information about the info centre or a field office with open hours for the public, together with contact details, is provided on the Project's printed materials distributed to stakeholders, as well as during public meetings and household visits.	Directly affected communities in the project area, and any other stakeholders and interested parties.	NPCU/ CPCUs

Method/ Tool	Description and Use	Content	Dissemination Method	Target Groups	Responsibility
Site visits and observation	<p>Visits to Project Site and facilities organized for local communities, county governments, and the media to demonstrate project solutions.</p> <p>Visitors are accompanied by the project's staff and specialists to cover various aspects and to address questions arising from the public during the tour.</p>	Demonstration of specific examples of project's design solutions and approaches to managing impacts.	<p>Targeted invitations distributed to selected audience offering an opportunity to participate in a visit to the project site.</p> <p>Limitation: possible safety restrictions on the site access during active construction works.</p>	<p>Local communities within the project area.</p> <p>Elected officials.</p> <p>Media groups.</p> <p>CSOs and NGOs and other initiative groups.</p>	NPCU/CPCUs

6.2. Roles and responsibilities for SEP implementation at NPCU and PCU

As defined by ESS10, stakeholder engagement for NAVCDP is an inclusive process and is being conducted throughout the project life cycle. The plan supports the development of strong, constructive and responsive relationships that are important for successful management of a project’s environmental and social risks

The implementation of this Stakeholder Engagement Plan (SEP) is critical for ensuring transparent, inclusive, and risk-managed project delivery.

The NPCU is generally responsible for the day-to-day management, coordination, and execution of the SEP.

Table 19: Roles and Responsibilities for the NPCU and PCUs

National Project Coordinating Unit	<p>Overall PCU Management & Coordination</p> <ul style="list-style-type: none"> • Strategic Oversight: Ensuring the SEP is integrated into early project and sub project decisions and covers the entire project and sub projects cycle. • Budgeting and Resourcing: The NPCU has the responsibility of ensuring allocation of necessary financial and human resources for engagement activities. • Compliance: The NPCU has the responsibility of monitoring compliance with environmental and social (E&S) covenants, specifically World Bank ESS10 requirements both at the NPCU and PCUs • Coordination: Liaising between the intergovernmental agencies, Counties, contractors, and stakeholders on the SEP execution.
National Project Coordination Unit & County Project Coordinating Unit	<p>Roles of NPCU and PCUs</p> <p>The E&S Staff at these levels are charged with the responsibilities as follows;</p> <ul style="list-style-type: none"> • SEP Execution: The Social and Environmental leads are charged with the day-to-day implementation of this plan. • Stakeholder Mapping: Both levels continuously update the list of stakeholders, including vulnerable groups in the project areas • Information Disclosure: Both project levels manage the timely dissemination of project and sub projects information in accessible formats and acceptable local languages.

- **Consultation Planning:** Organizing public meetings, focus group discussions, and workshops at the NPCU and CPCUs
- **Maintaining of the Channel:** Maintaining the already set accessible channels for feedback and complaints and day-to-day implementation of the GM and reporting to the World Bank as per the ESCP.
- **Implementing Case Management:** Both levels are charged with documenting, tracking, investigating, and resolving complaints in a fair, confidential, and timely manner
- **Reporting:** Disclosing and reporting to the stakeholders on-grievance trends and resolution at the NPCU or CPCUs and other levels of the project and sub project through periodic reports.
- **Monitoring and Reporting**
 - **Performance Monitoring:** Tracking progress against the SEP, including assessing if engagement is effective and inclusive.
 - **Reporting to Stakeholders:** Feeding back on monitoring results and project progress to stakeholders. Publication of a standard standalone annual report on the project's interaction with the stakeholders.
 - **Documentation:** Keeping records of all consultations, meetings, and feedback received. Ensuring that several Key Performance Indicators (KPIs) are monitored by the project regularly, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/ forums conducted within a reporting period (e.g Quarterly and annually)
 - Frequency of public engagement activities
 - 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)
 - Number of public grievances received within a reporting period (e.g. monthly, quarterly, or annually) and number of those resolved within the prescribed timeline

	<ul style="list-style-type: none"> ○ Type of public grievances received ○ Number of press materials published/broadcasted in the local, regional, and national media ○ Amount of Project’s grants investments in the local communities in the Project Area of Influence. <ul style="list-style-type: none"> • Handholding of Staff and other teams on the following <ul style="list-style-type: none"> ○ Local Outreach: Conducting field-level discussions and acting as the first point of contact. ○ Vulnerable Group Engagement: Ensuring special attention is given to marginalized groups to prevent exclusion.
<p>Roles of Institutions on SEP Implementation at the CPCU</p>	<p>Project counties have the following responsibilities to ensure SEPs move from paper to practice:</p> <ul style="list-style-type: none"> • Coordination: Coordinate Environment and Social Safeguards, and preparation of designs for the projects • Establishing Participation Platforms: The Counties facilitate to facilitate citizen participation, including project and sub project physical meetings, validation for a including ICT-based platforms. • Linkages: Provide linkage with other sector/departments in the county • Capacity building to communities on GRM implementation framework • Stakeholder Identification & Analysis: County Project coordination Units (PIUs) must create and maintain databases of stakeholders, categorizing them by influence, interest, and vulnerability. • Managing Communication Channels: Implement communications and engagement campaigns that increase awareness and build relationships with key stakeholders. • GRM: County project coordinating units are responsible with focal persons (CSS&GMO and CESCO) for setting up and overseeing help desks, feedback mechanisms, and grievance redress systems (GRM) to handle project-related complaints including <ul style="list-style-type: none"> ○ Collecting, acknowledging and reviewing from aggrieved stakeholders and uploading them into the project database; ○ Resolving disputes that may arise from stakeholders; ○ Provide feedback on any grievances raised;

- Preparing quarterly reports;
- **Inclusive Decision-Making:** They are tasked with ensuring that **vulnerable and marginalized groups** (e.g. IPs, persons with disabilities, women, & youth, the elderly etc) are represented and have a tangible impact on project design and implementation.
- **Resource Allocation:** Project and sub project Implementation requires counties to designate specific personnel or teams to manage stakeholder relationships and provide the necessary budget for engagement activities.
- **Monitoring & Reporting:** Counties must track engagement activities and report on how stakeholder input has influenced decisions, often using specific Key Performance Indicators (KPIs) to measure effectiveness.
- Systematic identification of all relevant parties early in the project lifecycle.
- **Consultation:** Engaging in two-way dialogues where community concerns are integrated into project design.
- **Capacity Building:** Conducting workshops to help stakeholders understand their roles and rights within the project.
- **Documentation:** Keeping records of all consultations, meetings, and feedback received. Ensuring that several Key Performance Indicators (KPIs) are monitored by the project regularly, including the following parameters:
 - Number of public hearings, consultation meetings and other public discussions/ forums conducted within a reporting period (e.g Quarterly and annually)
 - Frequency of public engagement activities
 - 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)
 - 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

	<ul style="list-style-type: none"> ○ Number of press materials published/broadcasted in the local, regional, and national media ○ Amount of Project’s grants investments in the local communities in the Project Area of Influence. ● Disclosure: Openly sharing project information through brochures, community meetings, and social media.
--	---

6.3. SEP Implementation Budget

123) Effective implementation of SEP requires dedicated resources to ensure stakeholder consultations, information disclosure, grievance redress, and monitoring activities are carried out efficiently. Table 19 outlines the budget for the training and capacity-building component of the SEP, which supports these activities and is incorporated into the Environmental and Social Management Plan (ESMP) to ensure stakeholder engagement is adequately financed and integrated into overall project safeguards.

Table 20: NAVCDP Stakeholder Engagement Training Modules and Budget

No.	Training Module	Target Audience	Lumpsum Budget (USD)
1	Awareness creation awareness of NAVCDP	All levels	30,000
2	Identification and networking Departments and establishment of project implementation structures	Line Departments / Implementation Parties	25,000
3	NAVCDP Launch	Public (Visibility)	85,000
4	Identification, analysis, and mapping of stakeholders	All levels	25,000
5	Role of the identified Stakeholder		150,000
6	Managing Stakeholder Interests	NAVCDP Management	62,000
7	Managing Stakeholder Participation	NAVCDP Management	62,000
8	Stakeholder Negotiation Skills	All levels	150,000
9	Effective communication Skills		50,000
10	Building Relationships for Effective Stakeholder Engagement		75,000
11	Establishment and Operationalization of Project GM Committees		100,000

12	Information Generation, Sharing, Communication, and Visibility Build-up		120,000
13	Stakeholders Review Meetings semi annually		20,000
Total Estimated Budget			954,000

7. STAKEHOLDER INVOLVEMENT IN NAVCDP MONITORING

124) One way to help satisfy stakeholder concerns and promote transparency is to involve project-affected stakeholders in monitoring the implementation of mitigation measures or other environmental and social activities. Such participation, and the flow of information generated through this process, can also encourage local stakeholders to take a greater degree of responsibility for their environment and welfare in relation to the project, and to feel empowered that they can do something practical to address issues that affect their lives. Participatory monitoring also tends to strengthen relationships between the project and its stakeholders. It is necessary to consider capacity-building and training programs to enable project-affected people or local organizations to acquire the technical skills necessary to participate in effective monitoring.

125) It is in the project proponents' interests to ensure that any groups monitoring their project have a sound technical understanding of the process, as it leads to more accurate and credible monitoring results and enables informed dialogue. The project proponents promote participatory monitoring with affected stakeholders. This level of monitoring requires the physical presence of affected individuals at the time that monitoring takes place and involves methods and indicators meaningful to the stakeholders concerned. As it is also good practice, in relation to any type of stakeholder involvement in project monitoring, care is taken in the choice of representatives and the selection process is transparent.

126) This SEP will be periodically revised and updated as necessary during NAVCDP implementation to ensure that the information presented therein is consistent and is the most recent, and that the identified methods of engagement remain appropriate and effective in relation to the project context and specific phases of the development. Any major changes to the project related activities and to its schedule are duly reflected in the SEP.

127) Quarterly summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions are continuously collated by responsible staff and referred to the NAVCDP project coordination unit (PCU) (this quarterly report is guided by data obtained and reported monthly at county level). The monthly summaries provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the project's ability to address those in a timely and effective manner.

I28) Information on public engagement activities undertaken by the project during the year are conveyed to the stakeholders in two ways:

- i. Publication of a stand-alone annual report on project's interaction with the stakeholders;
- ii. Several Key Performance Indicators (KPIs) monitored by the project on a regular basis, including the following parameters:
 - Number of public reviews, consultation meetings and other public discussions/forums conducted within a reporting period (e.g., monthly, quarterly, or annually);
 - Frequency of public engagement activities;
 - Geographical coverage of public engagement activities – number of wards, POs and/or Sub projects covered by the consultation process;
 - Number of public grievances and nature received within a reporting period, (e.g., monthly, quarterly, or annually) and number of those resolved within the prescribed timeline;
 - Number of press materials published/broadcasted in the local, County, and National media in the appropriate form and language; and
 - Number of project investments in the beneficiary communities in the project area.

8. GRIEVANCE MECHANISM

8.1 Overview

I29) NAVCDP has operationalized a comprehensive Grievance Mechanism (GM) to enable PAPs, workers, and other stakeholders to raise concerns, provide feedback, or seek clarification regarding project activities at any time during implementation. The GM is designed to function throughout the project lifecycle, including the contractor defect liability period.

I30) The objectives of the GM are to:

- i. Provide a transparent, accessible, and timely process for identification, assessment, and resolution of grievances related to project activities, including land access, compensation, labor conditions, and environmental and social impacts;
- ii. Strengthen accountability and responsiveness to project beneficiaries and affected persons, particularly VMGs; and
- iii. Reduce the incidence and escalation of grievances through early engagement, sensitization, and continuous stakeholder awareness.

I31) The GM framework is detailed in the ESMF, VMGF, RPF, Labour Management Procedures (LMP), GBV SEA/SH Prevention and Response Plan, and this SEP. While each instrument addresses specific risks, they are harmonized in terms of grievance intake, recording, escalation, training, and reporting. All grievances are logged, tracked, and monitored, and site verification is undertaken where necessary.

I32) The project retains overall responsibility for management of the Community (Stakeholder) GM, including grievances arising from contractor activities, while contractors are responsible for resolving worker-related grievances at site level under NAVCDP oversight. Common grievances include land access and compensation, damage to crops or property, environmental nuisances, labor and OHS issues, exclusion of VMGs, SEA/SH risks, and inadequate consultation.

8.2 Grievance Mechanism Structures

I33) NAVCDP implements two distinct mechanisms: the Community GM (for project - related impacts) and the Workers' GM (for labour-related disputes).

Community Grievance Redress Mechanism (C-GRM)

I34) The Community - GM operates through a tiered structure to ensure grievances are resolved at the closest level to the complainant. This is achieved through the 6-Step Process Flow outlined below:

- i. *Uptake/Entry*: Grievances are submitted via multiple channels (suggestion boxes, toll-free SMS/hotline, or in-person to GRC members).
- ii. *Recording and Acknowledgment*: The Focal Person registers the grievance and provides an acknowledgment receipt to the complainant within 7 days.
- iii. *Screening and Categorization*: Grievances are sorted by type (e.g., land, environmental, social) to determine the appropriate resolution path.
- iv. *Investigation and Resolution*: The GRC investigates the claim and proposes a resolution within 21 days.
- v. *Feedback & Close-out*: If the complainant accepts the resolution, the outcome is documented and the case closed. If dissatisfied, the case is escalated.
- vi. *Escalation*: Unresolved cases move from Ward (Level 1) to County (Level 2) and finally to the National (Level 3) level.

I35) Roles of Participants in C - GRM are described below:

- i. **Grievance Management Committee (GMC)**: Responsible for the overall administration of the GM at their respective levels (CIG/VMG, SACCO, FPO, CPCU, or NPCU).
- ii. **GMC Chairperson**: Directs the meetings and ensures resolutions are aligned with project guidelines.
- iii. **GMC Secretary (Focal Person)**: Responsible for documentation, managing the Grievance Log Register, and ensuring timelines are strictly followed.
- iv. **Community Representatives**: Ensure the process is transparent and that vulnerable groups (VMGs) are fairly represented during deliberations.

A schematic representation of the Community- GM is provided in Figure 2.

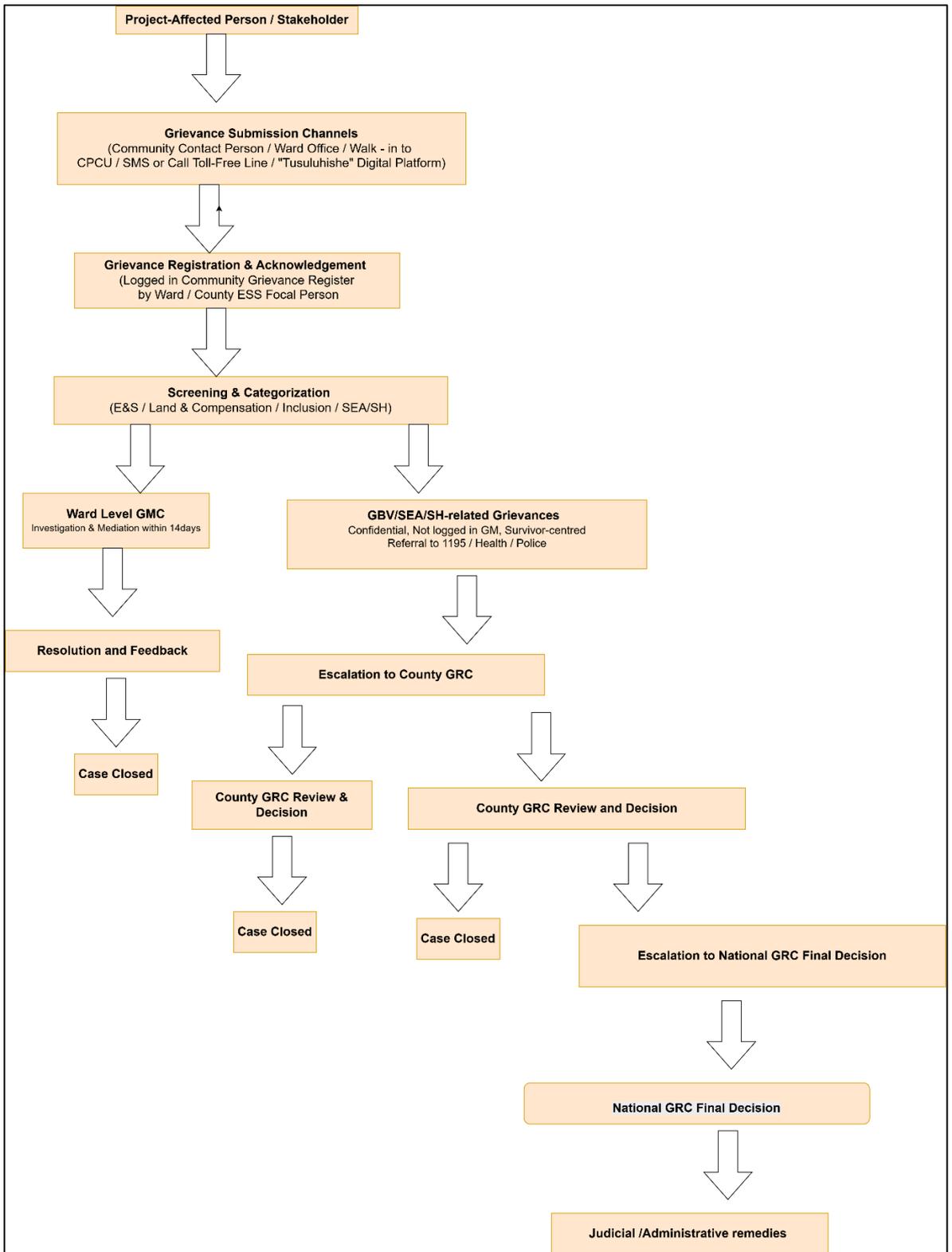


Figure 2: Community - Grievance Mechanism

Workers' Grievance Redress Mechanism (W-GRM)

136) In alignment with World Bank ESS2, the project ensures that all workers (including contractors and sub-contractors) have access to a specific mechanism to raise workplace concerns. The GM Process Flow for workers is outlined below;

- i. *Direct Filing*: Workers file complaints directly with the Contractor's Site Supervisor or the designated Site GM Focal Person.
 - ii. *Confidential Review*: The grievance is reviewed privately to protect the worker from potential retaliation.
 - iii. *Employer-Level Resolution*: The Contractor / Employer is the first responder and must attempt to resolve labor disputes (e.g., wage delays, PPE issues) internally.
 - iv. *Independent Appeal*: If the worker is unsatisfied, they may escalate the matter to the CPCU or the relevant Labour Office.
- 137) Roles of Participants in W-GRM include:
- i. The Contractor: Responsible for setting up the site-level GM and ensuring all workers are sensitized to its use during induction.
 - ii. Site GM Focal Person: A designated individual who maintains the Workers' Grievance Register and ensures anonymity where requested.
 - iii. National/County Safeguards Officers: Monitor the Contractor's logs to ensure compliance with LMP and prompt resolution of disputes.

Specialized Handling of SEA/SH Complaints

- 138) Grievances relating to GBV and SEA/SH follow a distinct, survivor-centered pathway to ensure safety and confidentiality.
- i. Information is restricted to the "need-to-know" only. The survivor's identity is never recorded in public logs.
 - ii. The GM Focal Person's primary role is to immediately refer the survivor to GBV Service Providers (medical, legal, and psychosocial support).
 - iii. Standardized Hotline: Uses the national 1195 hotline as a primary entry point for survivors.

A schematic representation of the Worker-GM Mechanism is provided in Figure 3.

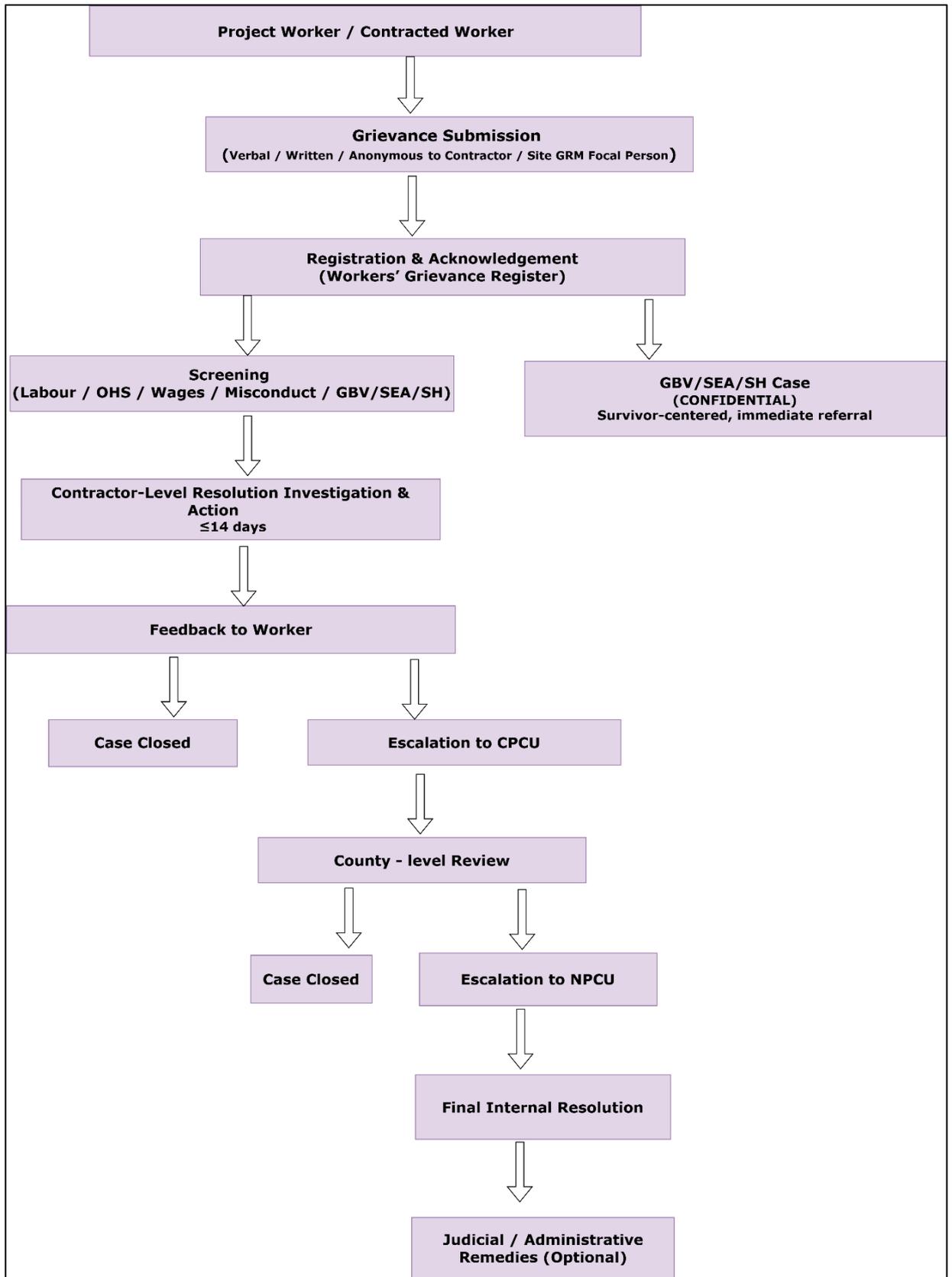


Figure 3: Worker - Grievance Mechanism

The standard grievance response timelines are as outlined in Table 20.

Table 21: Summary of GM Response Timelines

Step	Action	Responsibility	Timeline
1	Acknowledgment of Grievance	Focal Person	Within 7 Days
2	Screening and Categorization	GRC Secretary	Within 7 Days
3	Investigation and Resolution	GRC Committee	Within 21 Days
4	Communication of Outcome	GRC Chairperson	Within 30 Days

8.3 Closure and Escalation

139) A grievance is to be considered “resolved” or “closed” when a redress satisfactory to both parties has been reached, and after any required corrective measures have been successfully implemented. When a proposed solution is agreed by the complainant, the time needed to implement it depends on the nature of the solution. Once the solution is being implemented or is implemented to the satisfaction of the complainant, the complaint is closed out and acknowledged in writing by both the complainant and NAVCDP GMCs at respective levels.

140) In certain situations, it may not be possible to reach a satisfactory redress. This could occur if a complaint cannot be substantiated or is proved to be speculative or fraudulent. In such situations, NAVCDP efforts to investigate the grievance and to arrive at a conclusion is therefore well documented and the complainant advised of the situation. It is also possible that a complainant will not be satisfied with the proposed redress. In such cases, if NAVCDP cannot do more, the complainant will be asked to acknowledge refusal of the proposed redress in writing. NAVCDP then decides whether to implement the redress without the agreement of the complainant and the complainant will decide whether to pursue legal remedies.

8.4 Grievance Log Management

141) NAVCDP National and County offices are responsible for maintaining a grievance log register, which includes at least the following set of information.

- i. Date of the complaint.
- ii. Individual reference number.
- iii. Name of the person submitting the complaint, question, or other feedback, address and/or contact information (unless the complaint has been submitted anonymously).
- iv. Details of the complaint, feedback, or question/her location and details of his / her complaint.
- v. Name of person assigned to deal with the complaint (acknowledge to the complainant, investigate, propose redress, etc.).

- vi. Details of proposed redress, including person(s) who are responsible for authorizing and implementing any corrective actions that are part of the proposed redress.
- vii. Date when proposed redress was communicated to the complainant (unless anonymous).
- viii. Date when the complainant acknowledged, in writing if possible, being informed of the proposed redress.
- ix. Details of whether the complainant was satisfied with the redress, and whether the complaint can be closed.
- x. If necessary, details of GRCM (ward level) and GRCM (County level) referrals, activities, and decisions.
- xi. Date when the redress is implemented (if any).

8.5 GM Information Disclosure

142) Information about the GM is publicized as part of the initial disclosure consultations in the participating County and Wards. Brochures/flyers are distributed during consultations and public meetings, and posters displayed in public places such as in government offices, project offices, ward notice boards, community centers, etc.

143) Any aggrieved person can submit a grievance (at all levels to a Focal Person)

- i. By completing a written grievance form that is available -
 - (a) in the ward;
 - (b) at NAVCDP offices at all levels; and
 - (c) on NAVCDP website/Ministry website.

An example of a grievance Log form is provided in Annex 7 of this report.

- ii. By contacting NAVCDP community structures on GM or NAVCDP staff, either by telephone or in person. In addition, grievances may be communicated to contractor supervisors or to NAVCDP community-led structures, who are sensitized on receiving and reporting complaints. Grievances received verbally are recorded by the Environment and Social Safeguards Focal person on a grievance registration form and logged into the grievance register. A copy of the logged grievance is given to the complainant, giving them the opportunity to alert NAVCDP staff, if the grievance has not been noted down correctly.

144) NAVCDP sensitizes local communities the possibilities and ways to raise grievances during consultation meetings organized in each ward when this SEP and other project documents are disclosed and then at quarterly meetings thereafter. The GM procedures is disclosed through the project's website and also described in a brochure or pamphlet made available in ward administration buildings.

8.6 Monitoring and Reporting on Grievances

145) Day-to-day implementation of the GM and reporting to the World Bank is the responsibility of the project National Environmental Safeguards Lead (NESL) and Short-

Term Expert (STE) - Social Safeguards and Development. To ensure management oversight of grievance handling, the internal audit unit plus STE - Social Safeguards is responsible for monitoring the overall process, including verification that agreed redress are implemented. In case of accidents, SEA/SH, and other complaints with gravity (escalated to the World Bank), the project management must report to the Bank on progress of resolutions as per the stipulated timelines i.e., within 48 hours of occurrence.

8.7 Points of Contact

146) Information on the project and future stakeholder engagement programs is availed on the Ministry of Agriculture, and Livestock Development or project's website and also posted on information boards in the Counties and wards where NAVCDP is implemented. Information can also be obtained from NPCU, Offices in Nairobi, and CPCUs. Details of the national point of contact on stakeholder engagement program is shown below.

Description	Contact details
Name and position Address: E-mail: Telephone:	Samuel Guto, NPC NAVCDP, Nairobi, Kenya P.O Box 8073-00200 info@navcdp.go.ke +254 020 2715466

Description	Contact details
Name and position Address: E-mail: Telephone:	David Olang NESSL, NAVCDP NAIROBI, Kenya P.O Box 8073-00200 info@navcdp.go.ke +254 773-206-315
"Tusuluhishe" dashboard	https://grm.navcdp.go.ke/

8.8 World Bank Grievance Redress Service

147) The Grievance Redress Service (GRS) is an avenue for individuals and communities to submit complaints directly to the World Bank if they believe that a World Bank-supported project has or is likely to have adverse effects on them, their community, or their environment. The GRS enhances the World Bank's responsiveness and accountability to project-affected communities by ensuring that grievances are promptly reviewed and addressed.

148) The GRS considers a complaint admissible when:

- i. The complaint relates to a World Bank-supported project that is under preparation, active, or has been closed for less than 15 months
- ii. The complaint is submitted by individuals or communities affected by a World Bank-supported project, or by their authorized representative; and

- iii. The complainant(s) allege that they have been or will be affected by the World Bank-supported project.

149) Complaints must be in writing and addressed to the GRS. They can be sent by the following methods:

- i. Online, access the [online form](#)
- ii. By email to: grievances@worldbank.org
- iii. By letter or by hand delivery to the World Bank Headquarters in Washington D.C., United States or any World Bank Country Office - print and use this [form](#) (DOCX)

The World Bank, Grievance Redress Service, MSN MC10-1018,
1818 H Street Northwest, Washington, DC 20433, USA

Through

World Bank Kenya Country Office, Delta Center, Menengai Road,
Upper Hill P.O. Box 30577-00100 Nairobi, Kenya.

Tel: + 254 20 2936000

Email: Kenyainfo@worldbank.org

150) The following information should be included in a complaint:

Complaints must:

- i. Identify the project subject of the complaint
- ii. Clearly state the project's adverse impact(s)
- iii. Identify the individual(s) submitting the complaint
- iv. Specify if the complaint is submitted by a representative of the person(s) or community affected by the project
- v. If the complaint is submitted by a representative, include the name, signature, contact details, and written proof of authority of the representative.

151) Supporting evidence is not necessary but may be helpful in reviewing and resolving the complaint. The complaint may also include suggestions on how the individuals believe the complaint could be resolved. All complaints will be treated as confidential. The GRS will not disclose any personal data that may reveal the identity of complainants without their consent.

152) For procurement-related complaints, interested parties may file procurement-related complaints in Bank's financed projects. Detailed information can be found in [Project Procurement Complaints](#).

ANNEXES

Annex 1a: List of Identified Stakeholders (At Appraisal)

S / No.	Institution
1.	Agriculture
2	Livestock
3	Fisheries
4	KALRO
5	KEPSA
6	NEMA
7	KEBS
8	Irrigation
9	KAGRC
10	National Gender Commission
11	National Treasury
13	Pyrethrum
14	Coffee (Coffee research Foundation, Farmers, Transporters Processors)
15	Potato (Potato research, Farmers, Transporters Processors)
16	Local CSOs/NGOs
17	Indigenous Peoples Organizations (IPOs)
18	IPSSAHUTLC Reps
19	World Bank
20	NPCU
21	Other Development Partners
22	AFFA Secretariat
23	Farmers Umbrella Federation Organization
24	Industry Institutions related to Priority Value Chains i.e., KMC; Dairy;
25	Exporters i.e., HCDA,
26	Del Monte
27	Seed Merchants
28	KEPHIS
29	Poultry Breeders

Annex 1b: List of Identified Stakeholders (At Implementation)

S / No.	Institution
1	Farmers (Producers)
2	Transporters (Transport Companies)
3	Aggregators
4	Millers / Processors (Value Chain Actors)
5	Consumers
6	Exporters
7	Input Suppliers
8	Policy Makers (e.g., Farmers Associations)
9	Cooperatives / Cooperative Unions
10	Credit Lenders (e.g., SACCOs, Commercial Banks)
11	County Irrigation Development Units (CIDUs)

12	Farm Equipment Fabricators / Manufacturers
13	Farm Equipment Suppliers
14	Government Administrators - County and National Government Administrators National Government Administrators
15	Semi -autonomous Government Agencies
16	Farmers Associations (e.g., Cereal Growers Association)
17	Regional Crop Development Authorities (e.g., LBDA, CODA, KIDA, AFA)
18	Police Service
19	Office of the Attorney General (e.g., Registration of Associations - WRUAs / IWUAs)
20	Religious Organizations
21	Faith-Based Organizations (e.g., CARITAS)
22	Indigenous Peoples (IPs) Groups
23	National and County-Based Agricultural Development Projects
24	World Bank

Annex 2a: Public Consultation Workshop on NAVCDP ESS Core Framework and Plans

Indigenous Peoples Representatives - NAVCDP Public Consultation workshop on the ESS Frameworks and Plans

Indigenous Peoples Organization Reps (8.11.2021)

List Public and Stakeholder Consultation and Information Disclosure

S/No	Name	Tel.No.	Email address	Community	Region
1	Mohamed Kitete	0715349314	kitetemohamed@gmail.com	Indigenous Peoples Organization (IPO) Coastal region	Coastal region
2	Yunus Ahmed	0708722698	Yunusahmed90@gmail.com	"	"
3	Ambia Hirsi Dullow	0728546932	ambiadullow@gmail.com	"	"
4	Moses Kachine	0784395546	moseskachike@gmail.com	Minority and marginalized groups affairs- The presidency- Office of the DP	Country wide
5	John lengoisa	0710212957	jsamorai@ogiekpeoples.org	Ogiek people's organization	Mau region
6	Jane Machani	0716984618		"	"
7	John Kisiambai	0758805321		"	"
8	Milka Chepkorir	0700404454	mctalaa@gmail.com	Sengwer	Cherangany
9	David Yator	0726806100	sengwer@sengwer.org	Sengwer	

Annex 2b: Public Consultation Workshop on NAVCDP ESS Core Framework and Plans

County Representatives during NARIGP (CESSCO +2 IP Community reps) (8.11.2021):

S/No	NAME	COMMUNITY	COUNTY	TELEPHONE
1.	Fatuma Abdallah	Waata	Tana-River	0710583088
2.	George Wasonga	CESSCO	Tana-River	0725760206
3.	Joseph Mumu	CESSCO	Kiambu	0721422173
4.	Rehema M. Ruwa	CESSCO	Kilifi	0710586664
5.	Agnes Barisa	Waata	Kilifi	0791402478
6.	Jacob Kokani	Waata	Kilifi	0728044720
7.	Isaac Lagat	Ogiek	Uasin Gishu	0723411793
8.	Richard K.Maina	Ogiek	Narok	0711828692
9.	Naboe Ene Sameri	Ogiek	Narok	0708958908
10.	Meriki Joseph	CESSCO	Narok	0712803569

S/No	NAME	COMMUNITY	COUNTY	TELEPHONE
11.	Wilson K. Kurgat	Ogiek	Uasin Gishu	0722942038
12.	Gilbert Cheruiyot	CESSCO	Trans Nzoia	0727855330
13.	Richard Kipkering	CESSCO	Nandi	0723462103
14.	Isaac Kosgei	Sengwer	Trans Nzoia	0728519029
15.	Philis Mukung	Ogiek	Trans Nzoia	0740322434
16.	Paulo Sang	Ogiek	Nandi	0790900379
17.	William Kibitok Chepkwony	Ogiek	Nandi	0719537754
18.	Japheth Musila	CESSCO	Kwale	0711655420
19.	Bashora Muhindi Guyo	Wasanye	Kwale	0705474977
20.	Salim B. Bonaya	Wasanye	Kwale	0745934163
21.	Quentine Ngati	CESSCO	Taita taveta	0722797326
22.	Khadijah Wakio	Waata	Taita Taveta	0797179139
23.	Guyo S. Hamisi	Waata	Taita Taveta	0792971597
24.	Tony Igwo Elkana	Waata	Tana River	0724370830
25.	Stephen J. Ndung'u	Ogiek	Kiambu	0721477315
26.	Paul W. Njehu	Ogiek	Kiambu	0721469403
27.	Benson K. Gichuki	CESSCO	Nakuru	0719376601
28.	David Barngetuny	Ogiek	Nakuru	0722101146
29.	Francis Ngonino	Ogiek	Nakuru	0720645692
30.	Nixon Kasembeli	CESSCO	Uasin Gishu	0723846596

Annex 3: Virtual Stakeholders Consultation on Child Labour Held on March 16, 2022

No	Name	Station	Department	Position	Email
1.	Vinay Vutukuru	World Bank, Nairobi	Agriculture	TTL- NARIGP / NAVCDP	vvutukuru@worldbank.org
2.	Sangeeta Kumari	World Bank, Nairobi	Social safeguards	SSDS	skumari@worldbank.org
3.	Mary Nyamongo	World Bank, Nairobi	Social safeguards	Consultant	mnyamongo@worldbank.org
4.	Michael Njuguna	World Bank, Nairobi	Agriculture	Consultant	mnjugunamichael_gmail.com
5.	Rose Chepkoech	World Bank, Nairobi	Office Admin.	Admin.	rchepkoech@worldbank.org
6.	Faith Manyala	Nairobi	ILO	Children services	manyala@ilo.org
7.	Kimereh, Stanley	Nairobi	FAOKE	Agronomy	Stanley.Kimereh@fao.org
8.	christine otieno	Nairobi	Commissioner of Labour	Labour	c.obaraotieno@yahoo.com
9.	Marygorret Mogaka	Nairobi	Director, Children Services	Children	mumbuamogaka@yahoo.com
10.	Stanley Rotich	Nairobi	Children Office	Children	rockstano@gmail.com
11.	Daniel Waiti	Tana River	County Director	Children	danielwachira63@yahoo.com
12.	Olive Kamau	Meru	County Director	Children	oliveruguru@yahoo.com
13.	Peter S. Kutere	Homa bay	County Director,	Children	pkutere@yahoo.com
14.	Catherine kubai	Meru	County labour Officer	Labour	catekubai@gmail.com
15.	David Kirui	Homa bay	County Labour Officer	Labour	kiruid@ymail.com
16.	Emily Kimanzi	Machakos	County Director	Children	emilykimanzi3@gmail.com
17.	John Kimani	Nairobi	NARIGP	NPC	Jwkimani2018@gmail.com
18.	Judy Amadiva	Nairobi	NARIGP	NECO	jmamadiva@gmail.com
19.	Titus Mutisya	Nairobi	NARIGP	NESSCO	Tmutisya2003@gmail.com
20.	Benjamin Kilaka	Nairobi	NARIGP	Social safeguards Consultant	k.kilaka@gmail.com

Annex 4: Review Workshop - Additional Counties and Value Chains: List of Participants 12.02.2024.

No	Name	Gender	Tel. No.	email address	Institution
1	Dr. Gachara John	M	0722447079	gachara73@gmail.com	CECM- Kirinyaga
2	Regina Thamaïne	F	0724600300	thamaineregina@gmail.com	Murang'a
3	Francis Wachira	M	0727776878	wachiranguru66@gmail.com	Murang'a
4	Michael Maina	M	0722709020	mykemaina88@gmail.com	NARIGP
5	Joseph Maina	M	0705477939	maina0627@gmail.com	NARIGP
6	Maureen Mbugua	F	0718189056	maureenmbugua@fpmk.co.ke	NARIGP
7	Jane Muriithi	F	0724484100	wajamu84@gmail.com	NARIGP
8	Tsuma J. Tembo	M	0720359854	jtsuma89@gmail.com	NARIGP
9	Rebecca Lusweti	F	0722629693	raffela2007@yahoo.com	Bungoma
10	Joseph M. Kinyanjui	M	0722279562	jmkinanjui@gmail.com	Nairobi
11	Choly Lingiah	F	0714902484	lungchoci@yahoo.com	NAVCDP
12	Bernard Nyandegé	M	0723268128	nyadgebenard@gmail.com	NPCU
13	Esther Tom	F	0720254353	estherjelimo@gmail.com	Nandi
14	Jared Mutai	M	0721713068	jaredmutai@yahoo.com	Nandi
15	Martha Ndirangu	F	0722669078	ndirangumartha5@gmail.com	CPC- Trans Nzoia
16	John Wanyoike	M	0722348046	wanyoikejn@gmail.com	JASSCOM
17	Protus W. Khisa	M	0725882240	protuswkhisa@gmail.com	JASSCOM
18	Kiringai Kamau	M	0722800986	kiringai@p4cda.net	Murang'a
19	Roman Sherah	M	0722693369	kwalececmil.feq.com	CECM-Kwale
20	Dr. Clara Mwagona	F	0727828200	pmwagonakilifi.go.ke	CECM- Kilifi
21	Mwancha Nyasimi	M	0722731283	mwanchanyasimi@yahoo.com	CCO- Nyamira
22	Lucas Mosenda	M	0728571783	mosendalucas@gmail.com	CECM- Migori
23	Peter Nyamora	M	0725289566	peteromoni@yahoo.com	CPC- Murang'a
24	James Wamae K.	M	0726262397	jk.wamae68@gmail.com	Narok

25	John N. Nyaga	M	0722404698	jnsnyaga@gmail.com	CECM- Embu
26	David Muia	M	0725173532	muiad87@gmail.com	ESS
27	Emmanuel Kisebe	M	0726927581	emanukisebe@gmail.com	Bungoma
28	Dan Orwa	M	0722635272	danodhiambo22@gmail.com	Bungoma
29	Dr. Benjamin Kilaka	M	0726883288	k.kilaka@gmail.com	NARIGP
30	David Olang	M	0729700750	dolangs@gmail.com	ESS
31	Urbanus Mutua	M	0723505212	umutuaworldbank.org	WBG
32	Lydia Sengok	F	0727278105	sengokydia82@gmail.com	CCDO-NAVCDP
33	Zidi Aluoch	F	0725882189	zidiodhiambo@gmail.com	NAVCDP- POE
34	Gekone J. Maina	M	0722275912	mainagekone@yahoo.com	CCBO- Transzoia
35	Francis Miringu	M	0723174827	neffeef@gmail.com	CEC- Nyandarua
36	Dr. Jackstone Achola	M	0725247611	yalaachola@yahoo.com	CECM- Kajiado
37	Dr. George Mukok	M	0722876219	dr.gmukok@gmail.com	CECM- Busia
38	Gladys Nyambura	F	0726391275	gnnjoka@gmail.com	NAVCDP
39.	Edward Sawe	M	0722626309	edwardsawe30@gmail.com	CECM- Uasin Gishu
40.	Joseph Magwanga	M	0723319740	magwangaoyugi@yahoo.com	CECM- Homabay
41.	Dr. Monicah Fedha	F	0722563841	monicahfedha@yahoo.com	CECM- Bungoma
42.	Dennis Kasoo	M	0720444865	dennis.kasoo@gmail.com	CECM- Laikipia
43.	Kibibi Abdallah K.	F	0714970310	kagakweli@gmail.com	CECM- Mombasa
44.	Edna Tonui	F	0722734522	ednatonui5@gmail.com	CECM- Kericho
45.	Dr. Faith Mutegi	F	0720663489	fmutegu2001@yahoo.com	CECM- Meru
46.	Mwakwoya Rayan	M	0720870176	mwakwoyaray@gmail.com	Mombasa- Press

47.	Dixy Obiero	M	0700329848	dixy.obiero@gmail.com	Mombasa- Press
48.	Joyce Keshe	F	0723777889	joy.keshe90@gmail.com	CECM- Narok
49.	Juma Naburi	M	0722627242	naburi@yahoo.com	NAVCDP
50.	Dr. Stephen Mbaya	M	0725139207	stephenmbayakimwele@gmail.com	CECM- Kitui
51.	Kenneth O. Odhiambo	M	0722310869	onyangokenneth058@gmail.com	CECM- Kisumu
52.	Rosa C. Bett	F	0712602794	roschepngetich@yahoo.com	CECM- Bomet
53.	Njue Njagi	M	0721613535	njue74@yahoo.com	CECM- Tharaka Nithi
54.	Reuben Mwambingu	M	0712885022	ngoji.reuben@gmail.com	Mombasa- Press
55.	Leornard Kibor	M	0724230636	bor.leonard15@gmail.com	CECM- Nakuru
56.	Benjamin Andama	M	0721230432	andamabenjamin@gmail.com	CECM- Kakamega
57.	James Wachihi	M	0723814849	kilimonyeri@gmail.com	Nyeri
58.	Wilkister Nyanumba	W	0703733742	wilkisternyanumba@gmail.com	POE
59.	Lydia Ndungu	W	0723646683	lydiahn161@gmail.com	Nairobi
60.	Anthony Mahuiba	M	0711998383	tonnymahuiba5@gmail.com	Bungoma
61.	Haggai Pepela	M	0726749808	hpepela@gmail.com	Bungoma
62.	Patrick Muthiri	M	0720861437	muthiripatrick575@gmail.com	Kiambu
63.	Elizabeth Kakai	F	0792845976	baobaoeliza93@gmail.com	Bungoma
64.	Eng. Isaac Ngugi	M	0722679442	engugiwachira@yahoo.com	NPCU
65.	Japhlet Gikunda	M	0721287849	gikundajaphlet@gmail.com	NAVCDP
66.	Annastacia Kivuva	F	0722366927	annastaciakio@gmail.com	NAVCDP
67.	Mary Maingi	F	0714560899	marymaingi2000@gmail.com	NAVCDP
68.	Lilian Choi	F	0724668547	lilianchoi79@gmail.com	NAVCDP
69.	Nahashon Mungora	M	0727764348	mungoranahashon1@gmail.com	Nyeri

70.	Lavenda Apollo	F	0723523795	lapollo@worldbank.org	WBG
71.	Maur Bwanamaka	F	0722734232	mabwanamaka@yahoo.com	TANA AGRO
72.	Michael Njuguna	M	0714606045	mnjuguna@worldbank.org	WBG
73.	John Ngiyangi	M	0710512419	jnginyangi@gmail.com	ELRP/FSRP
74.	Mwiti Mary	F	0722822260	mary.mwiti@gmail.com	COG
75.	Mutahi Kaliya	M	0722383047	mutahi8@gmail.com	COG
76.	Mithika Gituri	M	0722248000	mithika.gituri33@gmail.com	CS
77.	Kenneth Lusaka	M	0722314951	lusakakenneth@gmail.com	Governor Bungoma
78.	Franci M. Molei	M	0720243294	francismahingy66@gmail.com	CS Office
79.	Eric Nyomoe	M	0728015294	ericnyomoe@gmail.com	CS Office
80.	Kitungulu Nicholas	M	0721713297	nkitungulu1@gmail.com	CECM- Vihiga
81.	James Musinga	M	0722971893	jmusinga@worldbank.org	WBG
82.	Kiplimo Lagat	M	0720893420	kiplimoaraaplagat@nandi.go.ke	CECM- Nandi
83.	Viney Vutukuru	M	0720407861	vvutukuru@worldbank.org	WBG
84.	Samuel Guto	M	0712715227	snyacha@gamil.com	NAVCDP
85.	Beryl Agengo	F	0733121847	bagengo@worldbank.org	WBG
86.	Job Mukaria	M	0701823782	mukariajob@gmail.com	CS Office
87.	Joel Khobondo	M	0705067582	jkhobondo@worldbank.org	WBG
88.	Rose Mwaniki	F	0722843944	rmwaniki@worldbank.org	WBG
89.	Nelly Covetti	F	0723303260	-	WBG
90.	Dr. Ronoh P. K	M	-	-	PS
91.	Stanley Mwangi	M	0728867854	mainas94@gmail.com	NPIA
92.	Dorcas Wangui	F	0700371595	dorcaswangui44@gmail.com	NAVCDP- YP
93.	Mithani MuThiku	M	0722619801	muthikumithani@gmail.com	NAVCDP
94.	Oliver Seje	M	0700298719	oliversejeoyoo@gmail.com	NAVCDP-
95.	Chongwony Miriam	F	0701745653	mirium3782@gmail.com	NAVCDP
96.	Judy Amadiva	F	0722862544	jmamadiva@gmail.com	NAVCDP

97.	Joel Mjomba	M	0712582400	joelmwamkonu@gmail.com	AIRC
98.	Cynthia Kirimi	F	0708280232	cyndynkir@gmail.com	NAVCDP
99.	Muthoni Muta	M	0722881040	muthonimuta@gmail.com	NAVCDP
100.	Lilliane Clarice	F	0717999672	lillianecarice@gmail.com	NAVCDP
101.	Festus Mwenda	M	0712678609	mwendaamwenda@gmail.com	KILIMO HOUSE
102.	Gabriel Ngua	M	0722933162	-	SDA
103.	Eric Nyomoo	M	0728015294	ericnyomoo@gmail.com	SDA
104.	Khatundi Phanice	F	0726064948	phanice@gmail.com	CECM
105.	Cosmas Omolo	M	0722216583	cosy.otieno@gmail.com	NPCU
106.	Nora Oyiengo	F	0719212567	oyiengo.nora@gmail.com	AIRC
107.	Ashley Elavisa	F	0798566909	elavisaashley@gmail.com	AIRC
108.	Charles Adinda	M	0720989722	charlesadinda@gmail.com	AIRC
109.	Sylvester Okoth	M	0790087092	sylvesterokoth@gmail.com	CECM- Siaya
110.	Elijah Obwori	M	0725989675	elijahobwori@yahoo.com	CECM
111.	Joyce Mutua	F	0725396615	joycemutua@gmail.com	CECM
112.	Eric Johnson Kyongo	M	0720282702	eric.kyongo@gmail.com	CECM- Taita Taveta
113.	Mwanasuma Hiribae	F	0712539560	mwanahiribae@gmail.com	CECM- Tana River
114.	Ibrahim Auma	M	0720807442	inyangoya@nairobi.go.ke	CECM- Nairobi
115.	W. Mwenda Kiara	F	0715359811	cecmwilfredkiara@gmail.com	CECM- Kiambu
116.	Gabriel Tuta	M	0711360425	gabtuta@gmail.com	NPCU- NAVCDP

Annex 5: Additional Financing Stakeholder Engagement Workshop - Naivasha Burch's Resort - 21.01.2026

5a. Typed Participant's List

S/No	Name	Gender	County	Telephone	Stakeholder Category
1.	David Olang	M	Nairobi	0729750700	NPCU ESS Lead
2.	Anastacia Kivuva	F	Nairobi	0722366927	NPCU -VC Lead
3.	Judy Amadiva	F	Nairobi	0722862544	NPCU - M&E Lead
4.	Maurice Mungai	M	Nairobi	0720886634	NPCU - M&E Lead
5.	Risper Pete	F	Nairobi	0722487307	NPCU - GBV/SEA STE
6.	Ayieni Jelliah	F	Nairobi	0704168476	NPCU - Social Safeguards STE
7.	Josephine Mogere	F	Nairobi	0722518070	Communications NPoE
8.	Tervil Okoko	M	Nairobi	0711671804	Communications NPoE
9.	Silasa Rakama	M	Nairobi	0711445914	ESS NPoE
10.	Stephen Kandagor	M	Nairobi	0723733719	ESS NPoE
11.	David Muia	M	Nairobi	0725173532	ESS NPoE
12.	Isaac Tallam	M	Nairobi	0722966332	Agribusiness & Marketing STE
13.	Tom Oula	M	Nairobi	0720853553	ESS NPoE
14.	Purity Essendi	F	Nairobi	0705879445	Young Professional
15.	Anne Kairu	F	Nairobi	0795610173	Young Professional
16.	John Makhulo	M	Siaya	0708690666	Rice farmer
17.	Barnaba Kimitei	M	Uasin Gishu	0721487754	Farmer
18.	Wilson Kurgat	M	Uasin Gishu	0722942038	Ogiek Consortium
19.	Mwihaki Gitonga	F	Meru	0700895885	Farmer
20.	Otieno Kennedy Ogola	M	Busia	0721765748	FPO Rice miller
21.	Juma Hamisi Toya	M	Kwale	0712203146	Transporter Mango
22.	Rashid Athuman	M	Kwale	0712776981	Wholesale Mango
23.	Dr. Gilbert Mwoga	M	Nairobi	0722340651	DDA
24.	James Njuguna	M	Murang'a	0721571313	CESCO
25.	Gerald Masila	M	Nairobi	0722516250	E.A Grain Council
26.	Caroline Jepkemboi	F	Nandi	0722655067	CESCO Nandi
27.	Peris Njeri	F	Nakuru	0720255526	CSS GMO Nakuru

S/No	Name	Gender	County	Telephone	Stakeholder Category
28.	Ibrahim Mutwafy	M	Mombasa	0722720314	CECM
29.	Roselyn Randu	F	Mombasa	0727649052	CCO
30.	Bernard Ayangah	M	Siaya	0724605640	CESCO Siaya
31.	Douglas Moenga	M	Nyamira	0796277699	FPO
32.	Martin Onyango	M	Siaya	0724556092	FPO- Anyiko
33.	Dorothy Audi	F	Vihiga	0711901601	CADO
34.	Ernest Khavogoi	M	Vihiga	0722406317	Avocado Farmer
35.	Vitalis Achami Kennedy	M	Busia	0720375595	Rice Aggregator
36.	Jerry A. Lilako	M	Vihiga	0722864924	Tea Farmer
37.	David Yator Kiptum	M	Trans Nzoia	0797807997	Indigenous Peoples Rep
38.	Paul Machira Muturi	M	Nyeri	0721465200	Tea Farmer
39.	Mohdhar Mohamed Abubakar	M	Mombasa	0717155633	MORGANICS
40.	Mutene Daniel	M	Mombasa	0723672062	Ministry of Agriculture
41.	Rehema M. Ruwa	F	Kilifi	0710586664	CESCO Kilifi
42.	Judith M. Mramba	F	Kilifi	0729767587	Farmer
43.	Julius Mwanyanje	M	Kilifi	0712610097	Indigenous Peoples Rep
44.	Jacob Kokani	M		0728044729	Indigenous Peoples Rep
45.	Johnson Mosaiga Kumare	M	Tharaka Nithi	0717003796	Indigenous Peoples Rep
46.	Jennifer Marusoi	F	Kericho	0722582683	Tea Farmer
47.	Wesley Rorich	M	Kericho	0720666171	FPO Kericho
48.	Kolil Hellen	F	Kericho	0716045354	Processor
49.	Peter Omwenga	M	Nyamira	0702772031	CESCO
50.	Ondieki Wyckliff	M	Nyamira	0728675471	Banana Value chain
51.	R. Betty Musyoka	F	Kajiado	0723372157	CSS Kajiado
52.	Alice Kemari Omundi	F	Uasin Gishu	0715985349	CADO
53.	Susan Akinyi Omwa	F	Kisumu	0716590944	CESCO Kisumu
54.	Grace Mnani Mbogholi	F	Kwale	0721916328	CADO
55.	Josphat Musenze	M	Kitui	0727725889	CGA
56.	Rosemary Owino	F	Nairobi	0723827159	Tea Board of Kenya
57.	Domnic Otieno	M	Kisumu	0717159435	Millers

S/No	Name	Gender	County	Telephone	Stakeholder Category
58.	Samwel. W. Ogotlah	M	Kisumu	0717544542	Farmer
59.	Caroline Wamade	F	Siaya	0712969671	Farmer
60.	Elijah Obadha	M	Bungoma	0720611748	CESCO
61.	Richard K. Ngeny	M	Nandi	0721628778	NTFC Union
62.	Cecilia Mungai	F	Kiambu	0723779352	CADO
63.	Noah Kosgei Kipkoech	M	Nandi	0724394029	Indigenous Peoples Rep
64.	Dorothy Auma Ogutu	F		0723091719	Rice farmer
65.	Hakima Shelkh Muktar	F	Nairobi	0714280906	Ministry of Agriculture
66.	Emmanuel L. Partaati	M	Kajiado	0713827106	Kajiwesi MMCS
67.	Daniel Kinyua	M	Tharaka Nithi	0724778362	Gakiuma CFS
68.	Anne Wanjiku Njagi	F	Tharaka Nithi	0722258563	CESCO Tharaka Nithi
69.	Purity Wanja Jason	F	Meru	0729746547	CESCO Meru
70.	Ann Godiah	F	Trans Nzoia	0729941101	Farmer RET
71.	Gekone J. Maina	M	Trans Nzoia	0722275912	CAIO
72.	Annpurity Wakio	F	Nyeri	0701855657	CAIO
73.	Robert Kiteme	M	Niarobi	0723369061	COG
74.	John Mwiti Kamencu	M	Meru	0722877428	Agventure - Private Sector
75.	Johnston Ngala Mbaru	M	Siaya	0726363074	Farmer
76.	Peter Nduati	M	Kiambu	0725809610	Kambaa Tea Factory
77.	Florence Mwangi	F	Murang'a	0722368557	Maize Farmer
78.	Rose Waitherero Mugo	F	Kiambu	0729020681	Kambaa Tea Factory
79.	Stephen Suza	M	Kiambu	0788856613	Chairman Ips
80.	Cosmas Murunga	M	Bungoma	0707797638	Indigenous Peoples Rep
81.	Stanley K. Mitambo	M	Tharaka Nithi	0792895076	FPO Natwana
82.	Eliana N. Macharia	F	Kilifi	0714031621	Aggregators
83.	Evans Wafula	M	UoN	0722659059	UoN

5b. Scanned Copy of the Attendance List



NATIONAL AGRICULTURAL VALUE CHAIN DEVELOPMENT
PROJECT
(NAVCDP)
National Project Coordination Unit (NPCU)



ACTIVITY: NAVCDP STAKEHOLDER CONSULTATION
VENUE: BURCH'S DESERT - NANYASHA
DATE: 21ST JANUARY 2026

ATTENDANCE LIST

S/N	NAME	GENDER	ORGANIZATION	TELEPHONE	EMAIL ADDRESS	SIGN
1.	Risper Pete	F	NAVCDP	0722487307	peteakinyi@gmail.com	
2.	Josephine Mogere	F	NAVCDP-DOE	0722578070	jmogere@gmail.com	
3.	Jennifer Manson	F	Wendococh	0722582083	Jennifer.Manson@gmail.com	
4.	Wesley Rotich	M	Kenya County	0720666171	Wesley.rotich171@outlook.com	
5.	KOHL HELEN	F	KERICHO COUNTY	0716045394	Koilhelen@gmail.com	
6.	STEPHEN SUZA	M	KIAMBUU	0788856608	Stephsuzer@gmail.com	
7.	PETER OMWENGA	M	NYAMIRA-CECO	0702772031	omwengapeter@gmail.com	
8.	Ayieni Jelliah	F	NAVCDP (NPCU)	0704168476	ayieni_j6@gmail.com	
9.	ONCIEKI WYCKLIFF	M	NYAMIRA COUNTY	0728675471	ondreki74@gmail.com	
10.	Annadacia Kumu	F	NAVCDP	0722366927	annadacia.kumu@gmail.com	
11.	R. Betty Mogyoka	F	NAVCDP KAJIADO	0723372157	bmogyoka@gmail.com	
12.	Alice K. Omyandi	F	CADO-UUC	0715985349	alicemogyandi20102011@gmail.com	

13.	JOHN MAKHULO	M	^(Siaya) USONGA RICE FARMER	0708670666	Makhulo John 83@gtm	John
14.	SUSAN OMWA	F	NAVCOP-KSM Uasin Gishu	0716590944	Susanomwa@gmail.com	John
15.	BARNABA KINIITE	M	KARURA	0721487754	Kiniitebarry@gmail.com	John
16.	WILSON KURGAT	M	OGTEK Uasin Gishu CONSORTIUM	0722942038	Wilsonkurono@gmail.com	John
17.	KENHEDY OTIENO	M	NAVCOP (BUSINESS)	0721765148	ogallao@tino@gmail.com	John
18.	MWIHAKI GITONGA	F	^{Mesa} Farmer	0700895885	Mwi.maki.l.gitonga@gmail	John
19.	RASHID ATUMMAN	M	WHOLESALE ^(Kwale) beans	0712776981	vashidattuma18@gmail.com	John
20.	JUMA HAMISI TOYA	M	^(Kwale) IRAS POTER MILK	0722203146	Tuma toya@gmail.com	John
21.	JAMES NJUGUNA	M	^(Musungu) CESCO (MKG)	0721571313	navcdpnuvanga@gmail	John
22.	FLORENCE MWANGI	F	Farm ^(Musungu) MAIZE	0722365557 0723365557	flomwangi71@gmail	John
23.	Dr Gilbert Mwangi	M	DDA	0722340651	GilbertMwangi@gmail.com	John
24.	Peter K. Nduati	M	KIAMBU - KIAMBU TEA FACTORY	0725809610	Inducti2010@gmail.com	John
25.	Rose W. Mugo	F	KIAMBU - KIAMBU TEA FACTORY	0729020621	westhemo.mugo@gmail.com	John
26.	GERALD MASILA	M	E-AGRIAN COUNCIL (EAGC) - Nairobi	0722516250	gmasila@eagc.org	John
27.	ISAAC TALLAM	M	NAVCOP	0722966332	tallamb2@gmail.com	John
28.	GRACE MBOGHOLI	F	CADO Kwale	071916328	gracemboghli@gmail.com	John
29.	TERVIL OKOKO	M	NAVCOP P.O.E	0711671844	tervilo@gmail.com	John
30.	JOSPHAT MUSENZE	M	CGA kitui	0727725559	jmusenze@egc.co.ke	John
31.	CAROLINE WAMADE	F	^{Siaya} FARMER	0712969671	carolunwamade@gmail.com	John
32.	ROSEMARY OWINO	F	^(Nairobi) Tea Board Kenya	0723827059	rowino@teaboard.co.ke	John
33.	COSMAS MURUNGA	M	IP Rep ^(Siaya)	0707797638	Murmpochemurle@gmail	John

Transforming from Subsistence to Commercial Farming

Capitol Hill Towers, Cathedral Road, P. O. Box 8073 - 00200, Tel: +254-773-206-316, Email: info@navcdp.go.ke

34.	JUDY 277- ^{Amambao}	F	NAVCDP	0722862544	judaonadiva@gmail.com	
35.	IBRAHIM MUMBA	M	CEM (MSA)	0722720314	ikmurtugy@gmail.com	
36.	Dr. Roxlyn Randa	F	CCO (MSA)	0727 649052	Sidir.oxelyn@yako.co.ke	Doc
37.	Richard K. Ngeny	M	NTFCU ^{Uasin} NANDI	0721-622778	ngenyrb@gmail.com	
38.	CECILIA MUNDIAT	F	NAVCDP- ^{Kimbu} CABO	0923771352	cecilianyugi@gmail.com	
39.	SAMUEL WAMBWATH DURELAT	M	NAVCDP- ^{Formet} KISUMU FARMER REP	0717544542	samueltwambwath@gmail.com	
40.	DOMINIC OTIENO	M	NAVCDP- ^{MILLERES} KISUMU	07117159435	MangoDominic2025@gmail.com	Man
41.	CAROLYNE JEPILEBOI	F	NAVCDP-NANDI	0722655067	Carolynjeppi@gmail.com	
42.	NOAH KOSKEI	M	NAVCDP-NANDI	0724394029	nkacgai@icgmail	ATLASICK
43.	Peris Ngatho	F	NAVCDP Nakuru	0720255526	navcdpnakuru@gmail.com	Peris
44.	Johnson M. Kumare	M	IP Rep ^(horob)	0717003796	0717003796	
45.	Bernard Ayugah	M	NAVCDP- ^{Sigga} STN	0724605840	072 bernardayugah@gmail.com	
46.	SILAS RAKAMA	M	NAVCDP-POE	0711445914	rammasilas9@gmail.com	
47.	Stephen Kambogo	M	NAVCDP-POE	0723733719	stephankambogo7@gmail.com	
48.	Douglas Mbenga	M	FPO-NAMIRA	0796277699	douglas.maenga@isf.ke	
49.	MARTIN ONYANBO	M	FPO- ^{Sigga} AMILCO	0724556092	martinonyango97@gmail.com	Man
50.	Dorothy Audi	F	CABO-VIHIGA	0711901601	audiangango@gmail.com	
51.	Ernest Kiarogor	M	AVACBO-VIHIGA	0722406317	ekiarogor@gmail.com	
52.	Vitalis Achani	M	RICE- ^(B-05) Aggregater Bumambu	0720375595	vitalisachani@gmail.com	
53.	Dorothy Auma Ogutu	F	RICE-Farmer ^(horob)	0723091419	cumadet@gmail.com	
54.	STANLEY K. MITAMBO	M	FPO NARWANA	0792895076	Kiriastanley@gmail.com	

Transforming from Subsistence to Commercial Farming

Capitol Hill Towers, Cathedral Road, P. O. Box 8073 - 00200, Tel: +254-773-206-316, Email: info@navcdp.go.ke

55.	ANNE WANJIKU	F	NAVCOP T/NIGI	0722258563	annesiiku@yahoo.com	
56.	DANIEL KINYUA	M	^{TERRACA NIGI} GAKIUMA GFS	0724778362	danielkinyua2204@gmail.com	
57.	Emmanuel K Partuati	M	^(Kig. 000) KATIWEET MMCS	0713827106	epartuati@gmail.com	
58.	Ann Godial	F	FARMER RET T/NEA	0729941101	godialkano2@gmail.com	
59.	GeKone J. Maino	M	NAVCOP-T/NEA	072225912	Mainagekone@gmail.com	
60.	Ampurity WAKIO	F	NAVCOP-MERI	0701855657	wakioann2@gmail.com	
61.	JOHN MWITI KAMENCU	M	^{Meru} AG-VENTURE	0722877428	Johnmuiti@agvke.com	
62.	JERRY A. LILAKO	M	VIHIGA-TEA	0722864924	Lilakojermy@gmail.com	
63.	Paul Machia Muturi	M	NYERI-TEA	0721465200	muturips0@gmail.com	
64.	YATOR KIPTUM	M	^{Trans Nait} NAVCOP-IP	0797807997	yatorry@gmail.com	
65.	FRANKIE KIRIRO	AT	AGRICULTURE	0713544441	kenocucoc@gmail.com	
66.	Hakima Sheikh Muxtar	F	^(Nairobi) Agriculture	0714280906	mushtaramuxtar001@gmail.com	
67.	MOHDHAR M. ARURAKO	M	MORGANCS	0717155653	mohdhar.m@gmail.com	
68.	DANIEL MUTENE	M	Agriculture	0723672062	danielimutene@gmail.com	
69.	REHEMA M. RUWA	F	NAVCOP-KILIFI	0710586664	rehemerewa@yako.com	
70.	JUBITH M. MAMBA	F	FARMER-KILIFI	0729767897	malambosinar@yako.com	
71.	JULIUS MWANANJE	M	NAVCOP-KILIFI	0712610097	mwanamuyajulius@gmail.com	
72.	Jacob Kokani Hegunda	M	IPS Ref	0728044720	hegundajacob@gmail.com	
73.	JOHNSTON MUALA	M	FARMER-SIAYA	0726363074		
74.	Purity Wajja	F	NAVCOP-Meru	0729746547	wajjapurity6@gmail.com	
75.	David Mwia	M	NAVCOP-NPOE	0725173532	mulad87@gmail.com	

Transforming from Subsistence to Commercial Farming

Capitol Hill Towers, Cathedral Road, P. O. Box 8073 - 00200, Tel: +254-773-206-316, Email: info@navcdp.go.ke

5c. Stakeholders Concerns and Project Responses on the Proposed Additional Financing

No	Stakeholder	County	Issue/Concern Raised	Project Response
LEAD FARMERS REPRESENTATIVES				
1	Samuel Wambisah FPO Chair	Kisumu	Rice Value Chain: What has NAVCDP done to smallholder farmers in ensuring that the value chain is improved, especially in Kisumu County? -What became of the money for rice demonstration plots? Farmers were mobilized and nothing has been done to date. The absence of the promised demonstrations has demoralized farmers.	Rice has just been introduced in the value chain list and will now be supported by the project. National Value chain development strategy already developed. Counties implementing rice to develop the Rice value chain development plans. - Siaya demo plots concern noted and referred to NPCU for follow up with the CPCU. - Demo plots concern noted and will further be consulted at the County stakeholder and other platforms.
2	John Makhuno Lead Farmer	Siaya	Rice value Chain: Affirmative action should be taken for rice and other value chains that have been added in the project. Demonstration farms: Farmers were promised and mobilized to participate in demos but nothing has been implemented to date, especially - Usonga and Siriwo rice producers.	This concern is well noted and will further be consulted at the County stakeholder and other platforms.
3	Anne Godiah Lead Farmer	Trans Nzoia	Value Chains Proposals Trans Nzoia is requesting for consideration on value addition on proposals on value chains supported by NARIGP, specifically dairy, chicken, tomato, mango - for increased commercialization. For new value chains, we request that fast-tracking be done for us to meet the timeframe on edible oils from maize, sunflower, soya etc.	The value chains mentioned are already under current implementation. Implementation processes will be fast tracked. Value chains plat forms will help address this.

No	Stakeholder	County	Issue/Concern Raised	Project Response
4	Hellen Lead Farmer	Kericho	Additional Funding and New Value Chains Are the funds under 'additional funding' separate from the normal funds.? Will the funds only cater for the additional value chains?	No. The US\$250 Additional Financing is for NAVCDP. It is not a new project, but a top-up to existing funds, from US\$275 to US\$525 million. The objective is to to enable NAVCDP address financing gap due to expanded scope.
5	Ogollah Lead Farmer	Kisumu	Additional Funding The presentation on additional financing looks good, but can the funds earmarked for the community actually reach the communities and not be spent in workshops? In KCSAP service providers earned huge sums of money yet today there is no KCSAP project anywhere in Kisumu to show that there was financing, Except irrigation projects. Kindly, reduce hotel meetings and implement the additional financing to the smallholder farmers. Engage farmers at the village and get to know the situation. More trainings should be done for community. Also provide infrastructure and increase agricultural inputs.	This concern is well noted. NAVCDP is a community-driven development roject and most resources are utilized in the proposals developed by the community institutions.
INDIGENOUS PEOPLES REPRESENTATIVES				
6	Wilson Kurgat Chairman - Ogiek Consortium Community Based Organization	Uasin Gishu	Chemicals Use and Apiculture Chemicals used in value chains have affected apiculture which is the main livelihood of IP near the forests. What measures has the national and county government put in place to regulate / eradicate the use of chemicals that are lowering production in Apiculture?	NACDP has an Integrated Pest Management Framework that guides implementation. All irrigation subprojects are required to prepare integrated pest management plans (IPMP) in align with guidance provided.

No	Stakeholder	County	Issue/Concern Raised	Project Response
7	Jacob Kokani IP Representative	Kilifi County	<i>New Value Chains and Additional Financing</i> With the addition of new value chains and the introduction of urban food systems component in Mombasa, will the project request for additional funding or it will utilize the existing funding?	The project has allocated adequate resources to be implemented under urban food systems.
8	Yator Kiptum Indigenous Peoples Representative - Sengwer	Trans Nzoia	Has a Social Assessment been conducted for the project? NAVCDP project design was Top-Down, not Bottom-Up especially when selecting value chains. For the Apiculture Value Chain, what specific support is earmarked for the IPs? Trans Zoia County Sengwer IP community have only benefitted for capacity building, since inception.	A Social Assessment was done on IPs in 13 counties and the report is disclosed. Social Assessment report is now available and will be shared and disclosed to all Counties with IPs. Proposals from the IP will be given high priority through Inclusion grants.
			From the 1.33 million small holder farmers reported to have transitioned to commercialization and market access, as per the Midterm Evaluation, how many are IPs?	This is available in the periodic reports through PMIS. More details are available at the CPCUs Stakeholders were urged to be proactive and ask for reports from NAVCDP.
			What is the status of IPs in the project? Is it at commercialization and market access level or production level?	Social Assessment report show that IPs are at all levels across most value chains in the Counties and the same is cascaded to project beneficiaries.
			IPs, especially Sengwer of Trans Zoia, have not benefitted from NAVCDP. They expected support on sustainable land management and farmer-led irrigation, but nothing so far.	The Project has started rolling out SLM activities in the counties during this phase. This will really benefit the Sengwer community.

No	Stakeholder	County	Issue/Concern Raised	Project Response
			When farmer A gives /provides land for demonstration plots will resettlement plan be applied?	The project is World Bank financed and is governed by World Bank Environment and Social Framework. In the case of voluntary donation of land for demo plots, NAVCDP implements an income restoration plan, as per guidance provided in the Resettlement Policy Framework. The project will not consider displacement or prior acquisition of land. Such interventions are excluded at screening stage.
9	Cosmas Murunga IP Representative	Bungoma	Indigenous Peoples - Benefits We have been engaging with the project but we have not realized any change since inception, as we are indigenous community in indigenous land deep in the forest. Can our issues raised be taken into account through affirmative action?	Noted; the issues will be addressed through subsequent project guidance. Proposals from the IP will be given high priority through Inclusion grants in subsequent budgets.
FPOs & SACCO REPRESENTATIVES				
10	Kimutai Tarakwa FPO Chairman	Uasin Gishu	Sunflower Crop Sunflower is grown as a rotational crop that can be cultivated during short rains, <i>i.e.</i> , after harvesting maize. In Uasin Gishu County, area under maize crop is estimated to be between 620,000 and 740,000 acres. If all farmers are trained and supported (at least 50 percent), we can harvest of maize 400,000 acres at 1000kg per acre, translating to 400,000,000 kg at KES 60 per acre. This will be a huge win for edible oil and sunflower cake. Twenty (20) societies participated in seed distribution. We are appealing to NAVCDP to assist cooperative societies with funding	In terms of markets, there is a big demand for proteins for animal feed supplementation, which can be sourced from sunflower.

No	Stakeholder	County	Issue/Concern Raised	Project Response
			to purchase oil press machines, and also to assist in mobilizing farmers to plant the crop.	
11	<p>Stanley K. Mithambo</p> <p>Chairman FPO Natwana</p> <p><i>The society engages in aggregation of green grams.</i></p>	Tharaka Nithi	<p>Green Grams Value Chain</p> <p>Our major concern is on storage facility. In 2024, we prepared a proposal, through the County Government, for the construction of storage facility for the green gram crop. We have land with title deed. This project has been visited by various players several times, including NPCU and public works who came to view the land and proposed site. An Environmental and Social Assessment was also conducted, but to date nothing has happened on the ground. We were called two times to verify the information and provide required project documents but nothing was forthcoming. Now that NAVCDP is winding up in 2027 (one year to go), what will happen to this request? 2025 ended without anything positive. Please take it as a kind concern.</p>	This is under implementation and will be fast tracked accordingly to benefit the farmers in that region.
12	<p>Douglas Moenga</p> <p><i>Representative from Banana Cooperative Society</i></p>	Nyamira	<p>Market Development & Infrastructure</p> <p>What aspects of market creation/development will be supported by the government?</p>	Markets infrastructure in the context of NAVCDP does not necessarily mean physical markets. The project has an Agribusiness and Markets Consultant at NPCU-level). Issue of markets will be addressed through subsequent project guidance.

No	Stakeholder	County	Issue/Concern Raised	Project Response
			What is the linkage between County Aggregation and Industrial Parks (CAIPs and the proposed markets to be developed by the project? How are these markets going to be different from the ones being done by the counties. How do we integrate the two?	All project infrastructures must meet Good International Industry practice (GIIP) standards. This will be maintained throughout the project life cycle.
PRIVATE SECTOR ACTORS				
13	John Imwiti - Private Sector Representative <i>Agventure Ltd is a Canola processing and Seed Company working in over 15 counties. Agventure Factory is in Nakuru County.</i>	Meru and Nakuru	Capacity building: Pass knowledge to all actors along the value chain, and not just the owners of the business (investors). Transporters (drivers, loaders, car washers) should be sensitized on safe handling of food produce from farm to market to ensure safety of food.	Noted and will be considered during implementation for all stakeholders to enhance food safety.
			Service provision & Enablers: Ensure timely availability of farm inputs to improve productivity and motivate farmers to produce and sustain the factories Extension services should advice farmers on planting on time, and in accordance with recommendations from soil testing, done by the County Government.	Noted and will inform ongoing project design and implementation. Currently NAVCDP supports e-voucher for farm inputs and Vaccination.
			Government should facilitate with electricity pricing, roads and other supportive infrastructure and let investors do the rest profitably	This is noted and will be consulted further with other partners.
			Contract farming: Encourage farmers to engage in contract farming and networking since government is only a facilitator. The County Government should contract	NAVCDP is a commercialization project. This will be addressed through FPOs and other farmer groups. Strong linkages will be bult with farmers and other stakeholders

No	Stakeholder	County	Issue/Concern Raised	Project Response
			processors for their registered farmers with premium pricing.	There is need to recast our mind, and even when training the farmers, they should be told that to get contracts before starting their investments. There is need to recast our mind, and even when training the farmers, they should be told that to get contracts before starting their investments.
			Canola: Please facilitate mechanization by helping farmers to acquire relevant machines for mechanization such as oil press and animal feed formulation	Noted for future programming and policy dialogue.
			Indigenous Peoples: A minimum present should be defined for the IPs, in the project.	An assessment was done on IPs in 13 counties and the report is ready for dissemination.
			Processors should create demand by all means for producers to see the need to grow the crops without fearing market problems.	Noted and will be consulted upon
			If possible, cottage industries and factories should be supported at their respective levels to propel demand for farmers to produce more.	This will further be addressed as component 2.2 in NAVCDP supports cottage industries through Market Access and Infrastructure development (MAID).
			Organic Waste: To produce Back soldier fly we use organic waste. However, there is a challenge in accessing the organic waste, whose main source is the markets (counties). The use/collection of this waste by feed manufacturers would sabotage the waste collection and contracts thus a source of conflict.	NAVCDP will engage with the County governments to design a working formula on the use of organic waste from markets by insect-based feeds manufacturers.

No	Stakeholder	County	Issue/Concern Raised	Project Response
			<p>Are counties going to develop proposals for the commercialization of the additional value chains?</p> <p>In terms of markets, there is a big demand for protein which can be sourced from oil seed such as sunflower.</p>	<p>After the closure of NARIGP and KCSAP, a study was conducted that informed the shift from productivity to commercialization and market access in NAVCDP.</p> <p>Value Chain Strategies will be used to prepare implementation plans. Market issue will be addressed in their implementation plans.</p>
			<p>Does the additional financing target 3.5m beneficiaries or the additional target is from 1.2m to 3.5 m</p> <p>How did the initial financing fair and what did it achieve?</p>	<p>The target is cumulative, not separate. NAVCPD Monitoring and Evaluation report, including Financial Management, is available, upon request at the NAVCDP offices.</p>
			<p>Service providers</p> <p>Can service providers be supported with machinery by the project?</p>	<p>The project supports this under EDP for the farmer groups.</p>
			<p>Private sector involvement</p> <p>How is the private sector involved in the project and how do they get financial support?</p>	<p>The private sector is represented in the NAVCDP's Project Technical Advisory Committees and the Steering Committees both at national and county levels.</p>
14	Jerald Masila East Africa Grain Council (EAGC)	Nairobi	<p>The private sector is struggling to understand how they will contribute/participate in the project. Where is the entry point?</p>	<p>Private sector is part of implementation e.g. Private Service providers. They are involved in the Value chain platforms at the CPCUs.</p>
			<p>Why is e-voucher only on vaccination? Why not inputs? Is a certificate issued after an animal has been vaccinated?</p>	<p>Currently, NAVCDP supports e-voucher for both farm inputs and vaccination.</p>
			<p>Market Access is well articulated in the project, but other policies hinder achievement of the project development</p>	<p>The project now has an Agribusiness and Markets Consultant on board (at NPCU-level). Issue of markets will be addressed through subsequent project guidance.</p>

No	Stakeholder	County	Issue/Concern Raised	Project Response
			Objective. Eg County Cess. We forward to feedback report and partnership with the Counties to achieve food security objectives, who are taking lead in execution/delivery	
URBAN FOOD SYSTEMS COMPONENT				
15	Dr Roselyn Randu Chief Officer	Mombasa	How do we distinguish peri-urban farmers from other farmers? What is the entry point for data? How do we measure distances for peri-urban farmers? How about relationship with the peri-urban clusters in implementation, in terms of resource sharing?	These concerns are well and will be addressed through subsequent project guidance.
16	Daniel Mutene CPC - Mombasa		Please guide the Chief Officer - Mombasa on the process of opening bank Account.	Now that Participation Agreement has been signed the County will be assisted to Fastrack project account opening.
NEW VALUE CHAIN - TEA SECTOR				
17	Machira Paul Muturi Director - Kenya Tea Development Agency (KTDA)	Nyeri	<i>Tea</i> Smallholder farmers account for 62% of tea production in the country. Multinationals account for about 32%. However, the farmers they live hand to mouth, with the average farmer earning about KES 9,000 a month. This is not enough to even educate their children. Tea is no longer profitable. What value chains were added later? Maize, rice, edible oil? Why exactly were the Tea smallholder farmers left out during selection of priority value chains in NAVCDP?	NACVDP is just one of the projects implemented by the government. Different initiatives support different value chains in the country.

No	Stakeholder	County	Issue/Concern Raised	Project Response
			<p>Tea farmers need infrastructure support to assist in value addition.</p> <p>Small stock is a missed opportunity in NAVCDP. i.e. dorper (sheep)</p>	
18	<p>Ngemy, R.K</p> <p>Chairman Nandi Tea Out Growers Cooperative Union</p>	Nandi	<p>While we look forward to the participation in NAVCDP, interventions in value addition, establishment of market linkages, capacity building, and infrastructure support for the tea sector, it would be necessary to borrow leaf from the South-South Model demonstrated in China, India and Sri Lanka. This will enable cooperatives to increase quality production, aggregation, transportation, processing and marketing in support of decentralized production that allows reduced reliance on Multinationals and "gate keepers".</p> <p>- Knowledge sharing: best practices, technologies, market insights for improved production and quality marketing.</p> <p>The project should consider borrowing and adopting models from India, China and Sri Lanka that will enable cooperators to increase quality production, aggregation, transportation, processing and marketing and support decentralized production that allows reduced reliance on multi nationals and "gate keepers".</p>	<p>Noted; these concerns will be addressed through subsequent project guidance.</p> <p>Value Chain Strategies will be used to prepare implementation plans. Market issue will be addressed in their implementation plans.</p>

5d. Sample Photographs - Stakeholders Consultation Forum on NAVCDP Additional Financing - Burch's Resort Naivasha.



NAVCDP National Environment and Social Safeguards Lead David Olang, addressing Stakeholders at the forum.

Date: 21.1.2026



*NPCU Communications Specialist
Judy Amadiva addressing
stakeholders at the forum.*

Date: 21.1.2026



Ibrahim Mutwafy, CECM Mombasa County, and Roselyn Randu, CCO, Mombasa County, keenly following the proceedings.

Date: 21.1.2026



Anastancia Kivuva, NAVCDP Value Chain Development Lead, addressing the participants (on behalf of the National Project Coordinator)

Date: 21.1.2026



David Olang delivering a presentation on Project Status and Environment and Social Safeguards - ESS 10 Requirements

Date: 21.1.2026





Sample Photographs of Stakeholders Following Proceedings at the Consultation Forum - 21.1.2026

Annex 6: Grievance Log Form

Grievance reference number (to be completed):			
Contact details (may be submitted anonymously)	Name (s):		
	Address:		
	Telephone:		
	Email:		
How would you prefer to be contacted (check one)	By mail/post: <input type="checkbox"/>	By phone: <input type="checkbox"/>	By email <input type="checkbox"/>
Preferred language	<input type="checkbox"/> Local	<input type="checkbox"/> Kiswahili	<input type="checkbox"/> English
Provide details of your grievance. Please describe the problem, who it happened to, when and where it happened, how many times, etc. Describe in as much detail as possible.			
What is your suggested redress for the grievance if you have one? Is there something you would like NAVCDP or another party/person to do to solve the problem?			
How have you submitted this form to the project?	Online <input type="checkbox"/>	email <input type="checkbox"/>	By hand <input type="checkbox"/>
	In person <input type="checkbox"/>	By telephone <input type="checkbox"/>	Other (specify) <input type="checkbox"/>
Who filled out this form (If not the person named above)?	Name and contact details:		
Signature			
Name of NAVCDP person assigned responsibility			
Resolved or referred to GRC1?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Resolved referred to GRC2?	<input type="checkbox"/> Resolved	<input type="checkbox"/> Referred	If referred, date:
Completion			
Final redress (briefly describe)			
	Short description	Accepted? (Y/N)	Acknowledgement signature
1 st proposed solution			
2 nd proposed solution			

3 rd proposed solution			
-----------------------------------	--	--	--

Name of Commenter/Aggrieved		Comment/Grievance Number	
Name of Organization (if applicable)			
Address and position			
Telephone/Fax			
Email Address			
Method of Grievance Placement	Mail Email Phone Walk In (Face to Face)		
Most effective means to send a response	Mail	Email	Phone
Date and Time of Comment/Grievance	Date	Time	
Nature and location of Comment/Grievance	Please provide details of grievance.		
What outcome are you seeking?			
Additional Information			
Any Supporting Documents Attached	Yes	No	
Initial Response details			
Date of initial response:			
Resolved/Addressed by:			
Nature of Resolution:			
Date of Resolution:			

Annex 8: NAVCDP County Priority Value Chains

S/N	County	Priority Value Chains
1.	Bomet	Dairy, Chicken, Potatoes, Avocado and Pyrethrum
2.	Bungoma	Dairy, Chicken, Coffee, Banana and Avocado
3.	Busia	Dairy, Chicken, Banana, Rice and Cotton
4.	Embu	Dairy, Coffee, Avocado, Mangoes and Apiculture
5.	Homa Bay	Dairy, Banana, Coffee, Rice and Cotton
6.	Kajiado	Dairy, Chicken, Tomatoes, Apiculture and Red meat (Beef)
7.	Kakamega	Dairy, Chicken, avocado, Banana and Apiculture
8.	Kericho	Dairy, Chicken, Coffee, Avocado and Pyrethrum
9.	Kiambu	Dairy, Chicken, Coffee, Avocado and Banana
10.	Kilifi	Dairy, Chicken, Apiculture, mangoes and Cashew
11.	Kirinyaga	Dairy, Chicken, Coffee, Tomatoes and Avocado
12.	Kisii	Dairy, Chicken, Coffee, Banana and Avocado
13.	Kisumu	Dairy, Chicken, Rice, Tomato and cotton
14.	Kitui	Dairy, Chicken, Apiculture, tomato and Mangoes
15.	Kwale	Dairy, Chicken, Cashew, Tomato and Apiculture
16.	Machakos	Dairy, Chicken, Coffee, avocado and Tomatoes
17.	Makueni	Dairy, Chicken, Tomatoes, Mangoes and Apiculture
18.	Meru	Dairy, Chicken, Coffee, avocado and Potatoes
19.	Migori	Dairy, Chicken, Banana, Tomatoes and Apiculture
20.	Murang'a	Dairy, Chicken, Coffee, avocado and Mangoes
21.	Nakuru	Dairy, Chicken, Apiculture, potatoes and pyrethrum
22.	Nandi	Dairy, Chicken, Coffee, avocado and Potatoes
23.	Narok	Dairy, Chicken, Tomatoes, Avocado and Tomatoes
24.	Nyamira	Dairy, Chicken, Coffee, ALVs, and Avocado
25.	Nyandarua	Dairy, Chicken, Coffee, Potatoes and Garden peas
26.	Nyeri	Dairy, Chicken, Coffee, Avocado and Potatoes
27.	Siaya	Apiculture, Chicken, Rice, Tomatoes and Cotton
28.	Taita Taveta	Dairy, Chicken, Potatoes, Bananas and Green-grams
29.	Tana River	Chicken, Green grams, Rice, Apiculture and Red meat(beef)
30.	Tharaka Nithi	Dairy, Chicken, Coffee, Green grams and Bananas
31.	Trans Nzoia	Dairy, Chicken, Avocado, Tomatoes and Banana
32.	Uasin Gishu	Dairy, Chicken, Coffee, Avocado and Potatoes
33.	Vihiga	Dairy, Chicken, Banana, Avocado and ALVs