



Combined Project Information Documents / Integrated Safeguards Datasheet (PID/ISDS)

Appraisal Stage | Date Prepared/Updated: 31-Jul-2018 | Report No: PIDISDSA23923



BASIC INFORMATION

A. Basic Project Data

Country Kenya	Project ID P166266	Project Name Kenya Development Response to Displacement Impacts Project Additional Financing	Parent Project ID (if any) P161067
Parent Project Name Development Response to Displacement Impacts Project (DRDIP) in the Horn of Africa	Region AFRICA	Estimated Appraisal Date 01-Aug-2018	Estimated Board Date 31-Aug-2018
Practice Area (Lead) Social, Urban, Rural and Resilience Global Practice	Financing Instrument Investment Project Financing	Borrower(s) Republic of Kenya	Implementing Agency Executive Office of the President, Department for Development of Arid and Semi-Arid Regions

Proposed Development Objective(s) Parent

Project Development Objective (from Project Appraisal Document)

The Project Development Objective is to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas in the Recipient's territory.

Components

- Component 1 – Social and Economic Infrastructure and Services
- Component 2 – Environmental and Natural Resource Management
- Component 3 - Livelihoods Program
- Component 4 - Project Management, Monitoring and Evaluation, and Knowledge Sharing
- Component 5 - : Support to IGAD for Expansion of the Regional Secretariat on Forced Displacement and Mixed Migration

PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	8.18
Total Financing	8.18



of which IBRD/IDA	0.00
Financing Gap	0.00

DETAILS

Non-World Bank Group Financing

Trust Funds	8.18
Miscellaneous 1	8.18

Environmental Assessment Category

B-Partial Assessment

Decision

The review did authorize the team to appraise and negotiate

Other Decision (as needed)

B. Introduction and Context

1. As of May 2018¹, Kenya hosted the fourth largest number of refugees in Africa, after Uganda, Ethiopia and the Democratic Republic of Congo (DRC). Some 468,910 refugees and asylum seekers from mainly Somalia (255,527), South Sudan (114,689), DRC (38,029); and Ethiopian (31,233). Persons of concern from other nationalities including Sudan, Rwanda, Eritrea, Burundi, Uganda and others make up the rest of the refugee population. Almost half of the refugees in Kenya about 208,616 reside in Dadaab, 186,088 in Kakuma and 74,206 in urban areas (mainly Nairobi). Somali refugees are mainly located in the Dadaab camp while South Sudanese are largely in Kakuma camp. The Dadaab refugee complex originally consists of five camps—Dagahaley, Ifo, Ifo 2, Hagadera, and Kambioos; the first three located in Lagdera (Dadaab) subcounty and the latter two in Fafi subcounty. The Kakuma refugees are in four camps, Kakuma I–IV, and the Kalobeyei settlement—all in Turkana West subcounty of Turkana County.
2. The protracted presence of refugees in Kenya has resulted in a complex relationship of interdependence between the refugees and the host communities. According to the World Bank-United Nations High Commissioner for Refugees (UNHCR) study on ‘Forced Displacement and Mixed Migration in the Horn of Africa’, the impact of refugee presence on Kenyan hosts has been positive overall with respect to social and economic impacts, though there have been significant negative impacts on the environment and natural resources. Various World Bank-UNHCR studies and the multi-stakeholder consultations in both Kakuma and Dadaab, especially with host communities, refugees, and various partner agencies during preparation of the parent project, revealed many impacts refugee presence has had on hosting areas. These include increased competition—direct and indirect—for basic social services such as health and

¹ http://www.unhcr.org/ke/wp-content/uploads/sites/2/2018/06/Kenya-Infographics_May-2018.pdf



education resulting in crowded health centers and classrooms; a degraded physical and natural environment because of high pressure on biomass to meet energy and construction needs; limited livelihood opportunities; and decreasing water availability evidenced by deeper boreholes and increased costs for water extraction and transport; and increased distances, time, or cost for collecting fuel wood for cooking and lighting. However, informal economic activities and remittances from overseas augment the buying power of refugees making them a major market for host-produced livestock and agricultural products as well as fuel wood and charcoal. Competition over the meagre livelihood opportunities and the dwindling natural resources is a driver of latent and potential conflicts between the hosts and the refugees.

3. The complex relationship of interdependence between refugees and hosts has in the recent past played out in local tensions around the consolidation of the Dadaab refugee camps. Declining humanitarian funding and the debate on the Dadaab refugee camps closure have resulted in measures towards rehabilitating Kenyans registered as refugees; shifting of South Sudanese and some of the Somali refugees awaiting resettlement to the Kakuma refugee camp and Kalobeyei settlement; and voluntary repatriation of Somali refugees from Kenya to Somalia. 76,589 Somalis have been assisted by UNHCR and partners to voluntarily return to Somalia between December 2014 and 1 December 2017² as per the Tripartite Agreement. In addition, a 2016 initial verification exercise undertaken by UNHCR in Dadaab identified 40,454 cases of double registration which includes persons who either possess a Kenyan ID card or are on record as having applied for one. A further validation by the Government is ongoing. As part of the resulting consolidation of the Dadaab refugee camp complex, the Kambioos camp was closed in 2017 and the closure of the Ifo2 camp is impending. The situation in Turkana is quite different with the initiative towards better integrating developmental support for host and refugee population in Kalobeyei and the vision to ensure more harmonized planning and delivery of essential services.
4. The refugee hosting areas in Kenya are situated in the north and northeastern regions, which have the highest poverty rates in the country and have historically experienced significant deficits in service delivery, infrastructure creation, and economic opportunities. With the advent of devolution in 2013, the county governments are now responsible for delivering most basic services including early childhood development, health, agriculture extension, water and sanitation, and environmental services to Kenyan nationals who are the host communities. The respective line ministries in the national-level government continue to be responsible for the education and social protection services while the former Ministry for Northern Kenya is now a department under the Ministry of Devolution and Planning. The capacity of the three refugee-hosting counties, Garissa, Turkana, and Wajir, are relatively weak. However, with the most ambitious and rapid devolution process under way in Kenya, these counties are keen to tackle long-term and deeply entrenched disparities in their regions; shift from a highly centralized, top-down to a more responsive bottom-up form of governance with greater autonomy; reduce unequal access of the population to basic services; and address key drivers of conflict related to environment and natural resource management in their areas.

A. Parent Project

5. The Development Response to Displacement Impacts Project (DRDIP) in the Horn of Africa (HoA) was designed as a regional operation to address the regional spillover effects of conflict and forced displacement in the sub-region. It aims to provide a development response to support the host communities in overcoming the shocks and impacts of protracted refugee presence and new refugee

² <http://www.unhcr.org/ke/figures-at-a-glance> accessed Aug 3, 2018.



influx, thus safeguarding refugee asylum space and contributing to a larger regional “public good”. The first phase of the regional project (P152822) was approved on May 31, 2016 supporting the three refugee-hosting countries of Djibouti, Ethiopia, and Uganda as well as the Intergovernmental Authority on Development (IGAD). The operation was designed as a series of projects (SoP), which allows for other countries in the HoA to opt into the program later according to their needs and specific requirements.

6. The Kenya DRDIP (P161067) was approved on April 26, 2017 as part of a second phase of DRDIP in the HoA and became effective on June 28, 2017.³ The project is an integral part of the broader ‘North and Northeastern Development Initiative’ (NEDI) for Kenya, specifically focusing on an area-based and progressive-solutions approach to address the impacts of protracted presence of the refugees on the host communities around the Dadaab and Kakuma refugee camps in Garissa, Wajir, and Turkana Counties of Kenya.

C. Proposed Development Objective(s)

Original PDO

7. The Project Development Objective is to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas in the Recipient's territory.

Current PDO

8. The Project Development Objective remains to improve access to basic social services, expand economic opportunities, and enhance environmental management for communities hosting refugees in the target areas in the Recipient's territory.

Key Results

9. The following key indicators will continue to be used to track progress toward the PDO:
 - (a) Beneficiaries with access to social and economic services and infrastructure (disaggregated by type of service and target group)
 - (b) Beneficiaries of economic development activities that report an increase in income (disaggregated by type of service, gender, and target group)
 - (c) Direct project beneficiaries, of which female
 - (d) Land area where sustainable environmental management practices have been adopted as a result of the project (hectare)

D. Project Description

10. Located in some of the poorest parts of the country and impacted by decades of refugee presence, the underserved communities in the five sub-counties in Garissa, Turkana, and Wajir face significant developmental challenges including service delivery deficits, a degraded environment, and an eroding livelihoods base and opportunities. At the same time, the humanitarian funding for refugees from which host communities have been benefiting to some extent is poised to decrease. Considering these needs, Government of Kenya (GoK) has requested Additional Financing (AF) to scale up activities of the Kenya DRDIP and the Kingdom of Denmark is providing a US\$ 8.18 million equivalent grant financing through the Kenya DRDIP Multi-Donor Trust Fund (MDTF).

³ The second phase for DRDIP in the HOA included a US\$ 100 million credit for Kenya and an additional grant in the amount of US\$ 3 million equivalent to IGAD.



The scale-up of activities in the beneficiary communities will increase the impact towards the achievement of the PDO in the three project counties as reflected in the revised targets of the Results Framework.

11. The proposed additional grant financing in the equivalent of US\$ 8.18 million will scale-up ongoing project activities in Kenya and bring total project cost for Kenya to US\$108.18 million. Including the US\$ 3 million equivalent grant to IGAD that is part of the parent project, total project cost will now be US\$ 111.18 million. The design, scope and components of the project will remain unchanged. The additional grant funding will be allocated across the four Kenya-specific project components proportionate to the original project allocations as captured in table 1.

Table 1: Current and AF cost by component

Project Components	Current Project (IDA US\$ m)	Additional Financing (TF US\$ m)	Total
1. Social and Economic Infrastructure and Services			
1(a) Community Investment Fund	42.5	3.50	46.00
1(b) Capacity Support for Local Planning and Decentralized Service Delivery	2.5	0.44	2.94
Subtotal	45.0	3.94	48.94
2. Environmental and Natural Resource Management			
2(a) Integrated Natural Resources Management	18	1.50	19.50
2(b) Access to Energy	2	0.25	2.25
Subtotal	20	1.75	21.75
3. Livelihoods Program			
3(a) Support to Traditional and Non-Traditional Livelihoods	25	1.50	26.50
3(b) Capacity Building for Community-Based Organizations for Livelihoods	2.5	0.44	2.94
Subtotal	27.5	1.94	29.44
4. Project Management, Monitoring and Evaluation, and Knowledge Sharing	7.5	0.55	8.05
5. Support to IGAD for Expansion of the Regional Secretariat on Forced Displacement and Mixed Migration (FDMM)	3	0	3
TOTAL	103	8.18	111.18

12. The AF does not involve any changes to the PDO and the PDO indicators will remain unchanged. Target values for selected PDO and intermediate result (IR) indicators, however, have been updated to reflect the increase in scale (see table 2 for a summary). While the total number of beneficiaries remains unchanged, the benefits per beneficiary will increase, i.e. one beneficiary can benefit from multiple investments. There will be an additional 3,360 beneficiaries of economic development activities that report an increase in income. 190 more community based organizations will be organized and 5,600 more beneficiaries will receive support for enhancing their livelihoods. An additional 780 hectares of land area will be brought under sustainable land management practices resulting in an additional 252,000 work



days being created for short-term employment in labor intensive public works sub-projects. Furthermore, an additional 21,000 beneficiaries will be able to access improved energy sources and an additional 70 ha will be provided with new/improved irrigation or drainage services.

Table 2. Updated target values for selected PDO and IR indicators due to the AF

Indicator	Original target	Revised target	Increase due to AF
Beneficiaries of economic development activities that report an increase in income	48,000	51,360	3,360
Land area where sustainable land management practices have been adopted as a result of the project (ha)	11,190	11,970	780
Community-based organizations formed or reinforced and still operational one year after receiving funding	2,700	2,890	190
Beneficiaries with access to improved energy sources	300,000	321,000	21,000
Area provided with new/improved irrigation or drainage services (ha)	1,000	1,070	70
Area provided with improved irrigation or drainage services (ha)	700	750	50
Area provided with new irrigation or drainage services (ha)	300	320	20
Beneficiaries of livelihood-support activities	80,000	85,600	5,600
Work days created for short-term employment in the subprojects	3,600,000	3,852,000	252,000

E. Implementation

Institutional and Implementation Arrangements

- The institutional, financial management, disbursement, procurement, social and environment safeguards management, and monitoring and evaluation arrangements of the parent project will remain the same under the AF. The investments being identified for the AF originate from the original project design. The project continues to be classified as Environmental Category B and there is no change in the applicable safeguard policies triggered under the original project. The existing Environmental and Social Management Framework (ESMF) and Resettlement Policy Framework (RPF) are applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in these instruments. The AF will not require a change in the current closing date of April 29, 2022. The scaled-up project will remain in line with the Country Partnership Framework (CPF) under which the parent project was designed and approved.



F. Project location and Salient physical characteristics relevant to the safeguard analysis (if known)

Like the parent project, the AF will be implemented in host communities around Dadaab and Kakuma refugee camps in Garissa, Wajir and Turkana counties. As most of the specific locations/sites of the subprojects have not yet been identified, the Client has prepared framework documents for the parent project in a consultative manner, including (a) an Environmental and Social Management Framework (ESMF) to ensure that a process of identifying, assessing, and mitigating environmental and social impacts is integrated in the development of the specific subprojects; (b) a Resettlement Policy Framework (RPF) to clarify the principles, legal and institutional procedures for resettlement and rehabilitation to be applied to investments; (c) expanded Social Assessments (SA), specifically for Wajir and Garissa counties, to ensure the project interventions benefit as well as avoid any potential adverse effects on vulnerable and marginalized groups (VMGs); and (d) a Vulnerable and Marginalized Groups Framework (VMGF) has been prepared as the overwhelming majority of the project beneficiaries in Wajir and Garissa Counties are ethnic Somalis and in Turkana people around the Kakuma refugee camp are Turkana who qualify as VMGs according to the Constitution of Kenya and as IPs per OP 4.10. These instruments were finalized and disclosed in accordance with the Bank's Operational Policy on Safeguards and the requirements of the Kenya National Environment Management Authority (NEMA) and National Land Commission (NLC). The Bank's environmental and social experts as well as the RSA have reviewed the consulted upon instruments. The existing instruments are applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in them. The instruments have been revised accordingly and were re-disclosed in-country and on the World Bank external website on July 12, 2018. When new subprojects and their locations/sites are identified under the KDRDIP, the Client will prepare additional supplementary site-specific safeguard instruments including Environmental and Social Impact Assessments/Environmental and Social Management Plans (ESIAs/ESMPs and Resettlement Action Plans/abbreviated Resettlement Action Plans (RAPs/aRAPs) which will be consulted upon, cleared by the World Bank, and then disclosed in-county and at the Bank's InfoShop prior to commencement of any civil works.

G. Environmental and Social Safeguards Specialists on the Team

Lilian Wambui Kahindo, Social Safeguards Specialist
Vanessa Sigrid Tilstone, Social Safeguards Specialist
Ben Okindo Ayako Miranga, Environmental Safeguards Specialist



SAFEGUARD POLICIES THAT MIGHT APPLY

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	The following project-related activities are likely to result in environmental and social risks: (i) expansion and improvement of service delivery, including small infrastructure; (ii) construction or rehabilitation of physical structures for water catchment management, such as check-dams and water harvesting structures, among others (iii) landscape restorative activities such as restoration/afforestation, eradication of noxious plant species; (iv) land-based livelihood activities, which could have limited adverse environmental and social impacts. Because the specific sites for implementing these activities are not yet known an Environment and Social Management Framework (ESMF) has been prepared and disclosed under the parent project. The existing ESMF is applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in the instrument. The ESMF has been revised accordingly and was re-disclosed in-country and on the World Bank external website on July 12, 2018.
Performance Standards for Private Sector Activities OP/BP 4.03	No	N/A
Natural Habitats OP/BP 4.04	No	The ESMF has provided detailed procedures to screen program activities/subprojects for potential adverse environmental and social impacts, and to take measures to avoid, minimize and mitigate impacts on forests. Project funds will not finance any activities that could result in adverse risk to ecologically sensitive and fragile ecosystems and natural habitats.
Forests OP/BP 4.36	No	Activities under Component 2 are likely to have a positive impact on forests with the implementation of physical and biological measures for soil and water conservation and afforestation. The ESMF has provided detailed procedures to screen program activities/subprojects for potential adverse environmental and social impacts, and to take measures to avoid, minimize and mitigate impacts



		on forests. Project funds will not finance any activities that could result in the conversion of naturally-occurring forests into man-made plantations or logging and harvesting of forests of all types.
Pest Management OP 4.09	Yes	The project will support activities under Component 2 and 3 that are likely to be agriculture-based and that may increase the application of agrochemicals (insecticides, herbicides, and fertilizers, among others). Therefore, the ESMF has included guidelines for integrated pest management to address related environmental and social impacts of the project.
Physical Cultural Resources OP/BP 4.11	Yes	Investments may involve excavation activities which can lead to impacts on physical and cultural resources. Chance Find Procedures have therefore been included in the ESMF.
Indigenous Peoples OP/BP 4.10	Yes	The project will be implemented in Turkana, Wajir and Garissa which are marginalized counties. The project will be implemented in counties with presence of vulnerable and marginalized communities that meet the criteria of IPs per OP 4.10. A social assessment has been undertaken and a social management plan/Vulnerable and Marginalized Groups Framework prepared which includes provision of free prior and informed consultations and a grievance-redress mechanism. The identified mitigating measures have been incorporated into the project design.
Involuntary Resettlement OP/BP 4.12	Yes	The project will involve the construction of small-scale infrastructure that might affect land holdings on community land. While these interventions are yet to be identified, the project has prepared, consulted upon and disclosed a resettlement policy framework (RPF) prior to appraisal to address any issues which might arise from physical and economic displacement and/or restriction of access to communal natural resources.
Safety of Dams OP/BP 4.37	Yes	Component 2 may support small dam construction (less than 4.5 meters) as part of small- and micro-scale irrigation schemes. The project will use the FAO Food and Agriculture Organization of the United Nations' "Manual on Small Earth Dams, A Guide to Siting, Design and Construction" (FAO 2010). For



		small dams, generic dam safety measures designed by qualified engineers will be included.
Projects on International Waterways OP/BP 7.50	Yes	The project will finance small-scale irrigation investments that would be through groundwater abstraction of aquifers such as Merti aquifer which serves the project counties of Wajir, and Garissa. Merti aquifer straddles between these counties and Somalia. This policy is triggered under the assumption that water from the Merti aquifer may be abstracted for irrigation purposes. The Government of Kenya has officially notified Somalia about the project, in accordance with Bank policy requirements and no response was received from Somalia by the due date of March 1, 2017.
Projects in Disputed Areas OP/BP 7.60	No	No activities under the project are in disputed areas

KEY SAFEGUARD POLICY ISSUES AND THEIR MANAGEMENT

A. Summary of Key Safeguard Issues

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

The project continues to be classified as Category B for the IDA Credit supported activities. Seven out of the ten safeguard policies remain triggered: Environmental Assessment (OP/BP 4.01), Pest Management (OP/BP 4.09), Physical Cultural Resources (OP/BP 4.11), Involuntary Resettlement (OP/BP 4.12), Indigenous Peoples (OP/BP 4.10), Safety of Dams (OP/BP 4.37), and International Waterways (OP/BP 7.50). Overall, the project would have positive environmental impacts through its activities under Component 2 which includes, among others, integrated natural resources management.

Environment: Some of the local-level investment activities under Component 1 and 2 may have limited adverse environmental risks and impacts. These activities could potentially include: (i) expansion/construction of small infrastructure, (ii) construction/rehabilitation of physical structures for water catchment management, etc., and (iii) land-based livelihood activities which could have limited adverse environmental and social impacts. The infrastructure works under component 1 will pose civil works/ construction related impacts including health and safety considerations, vegetation clearance and soil erosion, impacts on PCRs, dust pollution, disposal of construction waste, etc. Component 2 and 3 are expected to be positive through alleviating pressures on the poor that lead to unsustainable exploitation of natural resources and environmental degradation. The existing Environmental and Social Management Framework (ESMF) is applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in the instrument. The ESMF has been revised accordingly and was re-disclosed in-country and on the World Bank external website on July 12, 2018.

Social: The project’s anticipated social impacts has triggered OP 4.12 and in line with the Bank’s safeguard policies, the project has put in place mitigation mechanisms acceptable to the World Bank. For impact on potential land take



and/or restrictions in access to communal natural resources, a Resettlement Policy Framework (RPF) has been prepared under the parent project, consulted upon and disclosed. The existing RPF is applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in the instrument. The RPF has been revised accordingly and was re-disclosed in-country and on the World Bank external website on July 12, 2018. The Bank's OP 4.10 is triggered as the project counties are inhabited by Vulnerable and Marginal Groups that meet the characteristics defined under OP 4.10. A Social Assessment (SA) was undertaken under the parent project and this informed the development of a Vulnerable and Marginalized Group Framework (VMGF). Both the SA and VMGF were prepared, consulted upon and disclosed under the parent project. The existing SA and VMGF are applicable to the AF operation with minor revisions to reflect the increased scope of the project, as the activities financed by the AF and project areas are included in these instruments. The SA and VMGF have been revised accordingly and were re-disclosed in-country and on the World Bank external website on July 12, 2018. The project includes cost effective and accessible grievance handling mechanism to ensure that any related project issues and concerns are resolved using due process.

2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:

It is anticipated that the project including the AF will improve access to social services, expand economic opportunities and enhance environmental management for host community in the targeted areas, with no indirect and/or long-term negative impact in these areas. It is anticipated that the project including the AF will result in long-term positive safeguard impacts in the project area because of the project's emphasis on ensuring sustainable environmental management of natural resources and reduction in the unsustainable exploitation of natural resources, including mitigation of risks and other challenges faced by affected households. Social divisions could be exacerbated if inclusion and cohesiveness are not carefully promoted and potential conflicts mitigated. Possible indirect or long term impacts include further depletion of the water table if not managed e.g. irrigation projects and fragmentation of the rangeland if sub-projects are not well planned.

3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.

The "no project" alternative would deprive host communities already impacted negatively by refugee influx, the opportunity to improve access to basic social services, expand economic opportunities, and enhance environmental management. To ensure safeguards due diligence during implementation, the parent project is in the process of deploying more expertise at all levels; and the planning of sub-projects will involve full participation of beneficiary communities; and the project's activities will avoid land acquisition. Conflict mitigation measures are already being planned under the parent project alongside strong and trusted grievance redress mechanisms. Siting of infrastructure would need to mitigate changes in settlement patterns and other activities that further fragment the rangeland and interfere with migration and marketing routes. Water development would be carried out within a comprehensive water management plan and promote water efficiency and harvesting.

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

Capacity to manage safeguards issues is low in the National Project Implementation Unit at the Executive Office of the President. To ensure that environmental and social safeguards issues are given adequate attention during the implementation of the Project, the Bank had recommended that the Client recruits environmental and social safeguards experts at both the national and county levels. An environmental safeguards specialist and a social safeguards specialist are now in place at the National Project Implementation Unit (NPIU) and the project is recruiting environmental and social safeguards specialists in each project county. In addition, the project will harness synergies and collaborate and cooperate with other complementary projects, including on safeguards implementation, due



diligence and monitoring (Off-grid Solar Energy Access Project – P160009; Water and Sanitation Improvement Project – P156634; and Climate Smart Agriculture Project – P154784) supporting the three project counties.

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

The key stakeholders remain communities hosting refugees in Dadaab and Kakuma. Thus, people living in areas where civil works and other activities will be undertaken could be impacted by the project, which may result in small scale resettlement or disruption of livelihoods, or which may result in environmental damage. Adverse impacts are believed to be minimal in scope and nature and should be easily mitigated. The Client will carry out consultations with all potentially affected people and explain clearly what they may expect in terms of assistance to ensure that no one is left worse off as a result of the Project. Further stakeholders include concerned sector ministries at the national and county level, the National Environment Management Agency (NEMA), the Department of Refugee Affairs, the Frontier Counties Development Council (FCDC), UNHCR, and County Governors.

B. Disclosure Requirements (N.B. The sections below appear only if corresponding safeguard policy is triggered)

Environmental Assessment/Audit/Management Plan/Other

Date of receipt by the Bank 12-Jul-2018	Date of submission for disclosure 12-Jul-2018	For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors
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"In country" Disclosure

Kenya
12-Jul-2018

Comments

Resettlement Action Plan/Framework/Policy Process

Date of receipt by the Bank 12-Jul-2018	Date of submission for disclosure 12-Jul-2018
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"In country" Disclosure

Kenya
12-Jul-2018

Comments



Indigenous Peoples Development Plan/Framework

Date of receipt by the Bank	Date of submission for disclosure
12-Jul-2018	12-Jul-2018

"In country" Disclosure

Kenya
12-Jul-2018

Comments

Pest Management Plan

Was the document disclosed prior to appraisal?	Date of receipt by the Bank	Date of submission for disclosure
Yes	12-Jul-2018	12-Jul-2018

"In country" Disclosure

Kenya
12-Jul-2018

Comments

ESMF includes Pest Management Guidelines

If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.

If in-country disclosure of any of the above documents is not expected, please explain why:

C. Compliance Monitoring Indicators at the Corporate Level (to be filled in when the ISDS is finalized by the project decision meeting) (N.B. The sections below appear only if corresponding safeguard policy is triggered)

OP/BP/GP 4.01 - Environment Assessment

Does the project require a stand-alone EA (including EMP) report?

Yes

If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?

Yes



Are the cost and the accountabilities for the EMP incorporated in the credit/loan?

Yes

OP 4.09 - Pest Management

Does the EA adequately address the pest management issues?

Yes

Is a separate PMP required?

No

If yes, has the PMP been reviewed and approved by a safeguards specialist or PM? Are PMP requirements included in project design? If yes, does the project team include a Pest Management Specialist?

NA

OP/BP 4.11 - Physical Cultural Resources

Does the EA include adequate measures related to cultural property?

Yes

Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?

Yes

OP/BP 4.10 - Indigenous Peoples

Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?

Yes

OP/BP 4.12 - Involuntary Resettlement

Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?

Yes

If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?

Yes

Is physical displacement/relocation expected?

No

Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods)

No



OP/BP 4.37 - Safety of Dams

Have dam safety plans been prepared?

NA

Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?

NA

Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?

NA

OP 7.50 - Projects on International Waterways

Have the other riparians been notified of the project?

Yes

If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?

NA

Has the RVP approved such an exception?

NA

The World Bank Policy on Disclosure of Information

Have relevant safeguard policies documents been sent to the World Bank for disclosure?

Yes

Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?

Yes



All Safeguard Policies

Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?

Yes

Have costs related to safeguard policy measures been included in the project cost?

Yes

Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?

Yes

Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?

Yes

CONTACT POINT

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Program Leader

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APPROVAL

Task Team Leader(s):	Varalakshmi Vemuru Gandham N.V. Ramana
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Approved By

Safeguards Advisor:	Nathalie S. Munzberg	31-Jul-2018
Practice Manager/Manager:	Robin Mearns	31-Jul-2018
Country Director:	Carlos Felipe Jaramillo	13-Aug-2018