



RESTRUCTURING PAPER  
ON A  
PROPOSED PROJECT RESTRUCTURING  
OF  
NAIROBI METROPOLITAN SERVICES IMPROVEMENT PROJECT  
APPROVED ON MAY 10, 2012  
TO  
GOVERNMENT OF KENYA

SOCIAL, URBAN, RURAL AND RESILIENCE GLOBAL PRACTICE

AFRICA REGION

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CURRENCY EQUIVALENTS

(Exchange Rate Effective January 31, 2019)

Currency Unit = Kenya Shillings (KES)

US\$1 = KES 100.76

US\$1 = SDR 0.72

FISCAL YEAR

July 1 – June 30

**ABBREVIATIONS AND ACRONYMS**

BOD	Biochemical Oxygen Demand
ESHS	Environmental, Social, Health, and Safety
ESIA	Environmental and Social Impact Assessment
FY	Fiscal Year
IDA	International Development Association
ISWM	Integrated Solid Waste Management
KES	Kenya Shillings
NaMSIP	Nairobi Metropolitan Services Improvement Project
PAP	Project Affected Person
PCT	Project Coordination Team
PDO	Project Development Objective
RAP	Resettlement Action Plan
SGR	Standard Gauge Railway
US\$	United States Dollar



**BASIC DATA**

**Product Information**

Project ID P107314	Financing Instrument Investment Project Financing
Original EA Category	Current EA Category
Approval Date 10-May-2012	Current Closing Date 31-May-2019

**Organizations**

Borrower Government of Kenya	Responsible Agency Ministry of Transport, Infrastructure, Housing, and Urban Development
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**Project Development Objective (PDO)**

Original PDO

The Project Development Objective (PDO) is to strengthen urban services and infrastructure in the Nairobi metropolitan region. This will be achieved by (i) investing in local infrastructure (roads, markets, street lighting, bicycle and pedestrian pathways, drainage, and the like), (ii) investing in large-scale metropolitan infrastructure including supporting improvements in integrated solid waste management, sewerage collection and disposal, and transport, and (iii) strengthening the current and future entities responsible for service delivery, including the central ministry, current local authorities and future county governments, utilities and other service providers, and possible future metropolitan authorities responsible for planning, transport, and other services.

**Summary Status of Financing**

Ln/Cr/Tf	Approval	Signing	Effectiveness	Closing	Net		
					Commitment	Disbursed	Undisbursed
IDA-51020	10-May-2012	21-Jun-2012	17-Dec-2012	31-May-2019	300.00	201.17	69.64



### Policy Waiver(s)

Does this restructuring trigger the need for any policy waiver(s)?

No

## I. PROJECT STATUS AND RATIONALE FOR RESTRUCTURING

### A. Summary of the Proposed Restructuring

1. The restructuring of the Nairobi Metropolitan Services Improvement Project (NaMSIP) is required to (i) extend the project closing date by ten months to March 31, 2020; (ii) change the implementation schedule and disbursement estimates reflecting the renewed projections; and (iii) change the results framework aligned with the proposed extended project implementation period and updated targets. No other changes are proposed. The proposed restructuring is the second level 2 restructuring for the project (the first level 2 restructuring was approved in April 2017). The cumulative extension period including this proposal would be 33 months. While many of the project activities are expected to be completed by the current project closing date of May 31, 2019, the proposed restructuring is to enable the implementing agency to complete five critical infrastructure works and resettlement action plan (RAP) as well as the procurement of 7 fire engines, which would go beyond the current closing date, thereby enabling the achievement of the intended development objectives. The Government has requested for the closing date extension in its letters of November 8, 2018 and January 24, 2019.

### B. Project Background

2. The International Development Association (IDA) credit in the amount of SDR 192.8 million (US\$300 million equivalent) was approved on May 10, 2012 with a project development objective (PDO) of strengthening urban services and infrastructure in the Nairobi metropolitan region. The project became effective on December 17, 2012 and had an original closing date of June 30, 2017. A project restructuring was approved on April 20, 2017 to modify the implementation arrangements, project activities, cost estimates, disbursement allocation, and results framework, as well as to extend the closing date by 23 months to May 31, 2019.

3. The project experienced various challenges in the initial years of implementation, including from the country's then nascent devolution process and associated changes in the management of urban local governments, a series of restructuring of ministries, changes in the steering arrangements reflecting the ministerial restructuring, procurement delays in the ministerial tender committee, and insufficient budget allocation. As a result, project implementation started slowly, and the cumulative disbursement rate remained low at 4 percent in FY12/13, 5 percent in FY13/14, 10 percent in FY14/15, and 23 percent in FY15/16. Safeguards challenges, notably delays in preparation and clearance of safeguards documents and a number of safeguards non-compliance cases—12 cases of commencement of works before the clearance of environmental and social impact assessment (ESIA) reports; 2 cases of commencement of works before the RAP compensation; and 3 cases



of non-compliance of environmental, social, health, and safety (ESHS) measures in construction sites—also affected overall project implementation.

4. The first restructuring allowed the project to make an important turnaround in the past two years with improved performance in procurement, disbursements, and overall project management. The NaMSIP coordination team (PCT) developed a more proactive approach to project management, resulting in enhancing overall implementation capacity of the PCT itself as well as coordination with relevant counties and stakeholders. The average processing time for procurement and contract management has shortened and the cumulative disbursement rate increased to 38 percent in FY16/17, 60 percent in FY17/18, and 71 percent in December 2018. Significant progress has been made on safeguards as well. The PCT has been strengthened with internal safeguards monitoring and auditing system with the support of four additional social and environmental safeguards experts. Over 80 percent of RAPs and ESAs for 70 local and metropolitan infrastructure works have been prepared, cleared, and disclosed in the past two years. Of the 17 non-compliance cases, all are now back to compliance except the case of Ngong bus park where the affected traders had been displaced without compensation; this issue is being addressed and the traders have agreed to be accommodated in the RAP for Ngong market, whose construction commenced in November 2018. Other urban projects in Kenya started benchmarking NaMSIP’s internal safeguards monitoring and training practices to improve their environmental and social safeguards performance.

**C. Implementation Status**

5. The project is rated moderately satisfactory both for overall implementation progress and for progress towards the PDO. However, the rating for the component 2 (local infrastructure and services) was recently downgraded to moderately unsatisfactory as the four markets under this component experienced delays and were likely going beyond the current closing date. The rating for counterpart funding was also downgraded to moderately unsatisfactory because the delays in provision of counterpart funding for land compensation and for government portion of works, goods, and consultancies negatively affected project performance. Key actions have been agreed with the government to bring both ratings up to a satisfactory level, as described in the paragraph 9 below.

6. Overall project implementation has improved over the past two years, thereby making progress towards achieving its development objectives. Completed works have provided significant benefits with positive social impact and beneficiary satisfaction. The direct project beneficiaries have significantly increased, exceeding the target of 2.2 million, as major infrastructure works make progress. The project-supported strategic metropolitan planning integrating land use, transport, environment, economic activities, social services, and municipal finance is yielding sound planning documents and revenue enhancement tools to support sustainable growth in the Nairobi metropolitan region. Key results are summarized below:

Indicator	Target	Actual
Direct project beneficiaries	2,200,000	3,000,000
Female beneficiaries	50%	50%
People provided with access to “improved sanitation services” under the project	10,000	17,230



Indicator	Target	Actual
Number of people in urban areas provided with access to all-season roads within a 500-meter range	100,000	350,000
People in the Nairobi Metropolitan region living within one km of a location for a commuter rail station, benefitting from improved access to that location	350,000	170,000
Physical address system prepared for counties	3	3
Revenue enhancement plans prepared for counties	4	4
Integrated strategic development plans prepared	24	0
Drainage systems constructed (kms)	158	140
Street and security lights installed	1,500	1,198
Markets rehabilitated	5	0
Commuter rail stations for which surrounding public infrastructure has been built	15	10
Roads rehabilitated, non-rural (kms)	29	34
Plans for land use around rail stations	33	33
Sewage treatment facility put into operation	2	1
New household sewer connections constructed under the project	1,250	1,180
Integrated Solid Waste Management (ISWM) strategy prepared	1	1
Sanitary landfills operational under the project	1	0

7. Project implementation was negatively affected by (i) delays and inadequate release of IDA and counterpart funds<sup>1</sup> and consequent slow-down of construction and consulting services as well as delay in land acquisition and compensation for the project affected persons (PAP), (ii) prolonged electioneering in the first half of FY17/18 and associated disturbances, budget cut, and mandatory leave of the project’s procurement and accounting officer, and (iii) challenges in uploading budgeted IDA funds into the government accounting and financial management system following the reorganization of the ministry in charge of the project. These challenges have resulted in delays and the completion of a few key infrastructure works and RAP implementation going beyond the current closing date.

8. The following table presents implementation progress of major activities under each project component, categorized by the activities that are (i) completed as of end of December 2018, (ii) likely to be completed by the current closing date (May 31, 2019), and (iii) likely to remain incomplete by the current closing date.

	Major Activities Completed (% completed in parentheses)	Likely to be completed by May 31, 2019	Likely to remain uncompleted by May 31, 2019
<b>Component 1:</b> Institutional	<ul style="list-style-type: none"> <li>Integrated strategic urban development plans for 24 urban centers (80%)</li> </ul>	<ul style="list-style-type: none"> <li>All remaining activities</li> </ul>	

<sup>1</sup> Budget allocations need to be made and released for both counterpart funds and amounts financed by IDA in accordance with the government budgeting system in Kenya.



Reform and Planning	<ul style="list-style-type: none"> <li>Urban redevelopment detailed plans for Nairobi central railway station, Embakasi Standard Gauge Railway (SGR) station and Eastlands (70%)</li> <li>Revenue enhancement plans for four counties (100%)</li> <li>GIS-based valuation roll for Nairobi (90%)</li> <li>Physical address system for four urban cities (95%)</li> </ul>		
<b>Component 2:</b> Local Infrastructure and Services	<ul style="list-style-type: none"> <li>28km of 36km local carriage way and associated pedestrian walkways</li> <li>1200 of 1400 streetlights</li> <li>140km of 158km storm water drainage works</li> <li>2 of 4 fire stations</li> <li>2 bus parks and 3 parking bays</li> <li>7 markets under construction (5-40%)</li> </ul>	<ul style="list-style-type: none"> <li>All remaining works except 4 markets</li> <li>Procurement of 7 fire engines</li> </ul>	<ul style="list-style-type: none"> <li>4 markets in Karandini, Ngong, Juja, Ruiru</li> <li>Delivery of 7 fire engines</li> <li>Associated RAP/ESIA implementation for continuous stakeholder engagement, grievance redress, and final move-back of market traders</li> </ul>
<b>Component 3:</b> Metropolitan Infrastructure and Services	<ul style="list-style-type: none"> <li>74km of inter-regional arterial road connecting Tala-Kenol-Kangundo-Machakos-Katumani-Mombasa road</li> <li>10 commuter railway stations (95%)</li> <li>1 of 2 sewage treatment system and 113km of 133km sewerage</li> <li>Integrated land use and transport plans around 33 commuter railway stations (100%)</li> <li>Non-motorized transport plans (100%)</li> <li>Tala-Konza corridor plan (80%)</li> <li>Integrated solid waste management strategy (100%)</li> </ul>	<ul style="list-style-type: none"> <li>All remaining works except Mitubiri landfill</li> </ul>	<ul style="list-style-type: none"> <li>Landfill at Mitubiri</li> <li>Associated ESIA implementation for continuous stakeholder engagement and grievance redress</li> <li>Land compensation for Juja sewerage</li> </ul>

9. The following key actions have been agreed with the government to mitigate the risks relating to the outstanding activities and ensure that those activities are completed within the proposed extended closing date, thereby bringing project ratings up to a satisfactory level:

- (i) Supplementary budget of US\$40 million equivalent and new budget of US\$30 million equivalent relating to IDA funds shall be released to cover the expected expenditures for the remaining period of FY18/19 and FY19/20, respectively;<sup>2</sup>
- (ii) Supplementary budget of US\$15 million equivalent (including US\$8.8 million equivalent for Juja sewerage land compensation and US\$6.2 million equivalent for government portion of works, goods, and consultancies) and new

<sup>2</sup> Refer to footnote 1.



budget of US\$2 million equivalent relating to Government counterpart funds shall be released for the remaining period of FY18/19 and FY19/20, respectively;

- (iii) Compensation to the PAPs on the markets shall be completed by December 2018 (Current status: this is substantially completed except those cases with account problems, which are expected to be completed by end of February 2019);
- (iv) Stakeholder engagement shall be continued and institutionalized to enhance the Muranga county's ownership and support to Mitubiri landfill; and
- (v) Construction of the four markets to be completed (relocation as well as main market sites) and the Mitubiri landfill, and the procurement of 7 fire engines, shall be closely monitored according to the agreed detailed implementation program.

10. **Disbursements.** As of end of December 2018, the IDA credit is fully committed and US\$193.23 million (71.4 percent) has been disbursed. While the disbursement is slow relative to overall implementation progress, the remaining balance is expected to be fully disbursed with the proposed extension of the project and completion of the outstanding works.

11. **Safeguards.** The project is rated moderately satisfactory for safeguards implementation. The following are key points for attention:

- (i) Land compensation for Juja sewerage (US\$8.8 million equivalent) remains long outstanding. The government has committed to budgeting and releasing adequate funds in the supplementary budget for FY18/19.
- (ii) RAP implementation needs to be completed (the status is summarized in the Annex). Compensation to the PAPs for the four markets is substantially completed except those cases with account problems. The resettlement in Ngong market needs to be monitored closely since it has the largest number of affected traders (1912) and the non-compliance history (resettlement occurred on Ngong bus park where the traders had been displaced without compensation). This issue is now being addressed, and the traders have agreed to be accommodated in the RAP for Ngong market, the construction of which commenced in November 2018 and is expected to be completed in December 2019.
- (iii) There have been six ESHS incidents reported under the project, resulting in four fatalities, one injury and property damage to 60 households during the period March 2015 to December 2017. Cases relating to two fatalities and the house property damage have been fully addressed through payment of compensation. Of the remaining ESHS incidents, two fatalities and an injury case remain pending awaiting final court decision on compensation. For these pending cases, the PCT is in discussion with the concerned contractor to provide an unconditional bank guarantee equivalent to the estimated amount for compensation and a legal undertaking covering any eventuality which may go beyond the guarantee. All the other agreed actions, including site-specific mitigation measures, training and safety audits have been implemented and monitored.
- (iv) There has been overall improvement in safeguards performance in the past two years. Safeguard issues continue to remain critical for project implementation, given the high social and environmental risks in implementing infrastructure works in dense urban settings. This requires continued heightened attention by all the stakeholders including the PCT, ministry, county governments, contractors and supervision consultants.



#### D. Rationale for Restructuring

12. Despite the recent progress in implementation, it has been challenging to catch up with the past delays in five critical infrastructure works and procurement of fire engines. In order to allow these works, RAP implementation and procurement to be carried out, and for the project to ultimately achieve its development objectives, the project closing date is proposed to be extended by ten months from the current May 31, 2019 to March 31, 2020.

13. Without the proposed extension, the result indicators for (i) number of markets rehabilitated, and (ii) number of sanitary landfill operational would not be achieved. Further, given the socially sensitive nature of the outstanding activities, the RAP and reputational risks are assessed to be high if they are left unsupervised or uncompleted. In particular, the non-compliance case of Ngong bus park would remain unresolved without completion of Ngong market, which would likely result in substantial grievances by affected traders.

14. The Task Team confirms that there are no outstanding audits or interim financial reports for the project and with the proposed extension of the closing date the PDO remains achievable and the performance of the Borrower remains satisfactory, and the agreed actions with the Borrower will be undertaken to complete the project.

## II. DESCRIPTION OF PROPOSED CHANGES

15. The proposed restructuring includes the following changes:

- (i) Change in project closing date: After an in-depth review of the portfolio tracking of all project activities, a 10-month extension of the closing date from May 31, 2019 to March 31, 2020 is needed, in order to enable a few key infrastructure works and goods and associated RAP implementation to complete as designed and to ultimately achieve its development objectives.
- (ii) Changes in implementation schedule and disbursement estimates: Disbursement estimates need to be revised reflecting the actual disbursements in the past years and a renewed forecast for the future years based on the projected implementation schedule of the ongoing and planned works.
- (iii) Changes in results framework: the results framework needs to be updated to align with the proposed extended project implementation period. Some result targets—including the number of beneficiaries; people provided with access to all-season roads within a 500 meter range under the project; people in the Nairobi Metropolitan region living within a one kilometer radius of a location for a commuter rail station, benefitting from improved access to that location; number of street lights installed; and non-rural roads rehabilitated—are updated reflecting the actual achievement and renewed projections. The following two indicators: (a) volume of biochemical oxygen demand (BOD) pollution load removed by treatment plant, and (b) quantity of waste disposed at landfills constructed under the project, are proposed to be dropped as these indicators can be measured after at least one year of operation of the completed system for sewerage and landfill, beyond the proposed extension of the project closing date. The project's key performance indicators for the sewage treatment facility put into operation, new household sewer



connections constructed under the project, and sanitary landfills operational under the project remain unchanged and capture the results of the project’s interventions on the sewerage and landfill.

### III. SUMMARY OF CHANGES

	Changed	Not Changed
Results Framework	✓	
Loan Closing Date(s)	✓	
Disbursement Estimates	✓	
Implementation Schedule	✓	
Implementing Agency		✓
DDO Status		✓
Project's Development Objectives		✓
Components and Cost		✓
Cancellations Proposed		✓
Reallocation between Disbursement Categories		✓
Disbursements Arrangements		✓
Overall Risk Rating		✓
Safeguard Policies Triggered		✓
EA category		✓
Legal Covenants		✓
Institutional Arrangements		✓
Financial Management		✓
Procurement		✓
Other Change(s)		✓
Economic and Financial Analysis		✓
Technical Analysis		✓
Social Analysis		✓
Environmental Analysis		✓



IV. DETAILED CHANGE(S)

LOAN CLOSING DATE(S)

Ln/Cr/Tf	Status	Original Closing	Revised Closing(s)	Proposed Closing	Proposed Deadline for Withdrawal Applications
IDA-51020	Effective	30-Jun-2017	31-May-2019	31-Mar-2020	31-Jul-2020

DISBURSEMENT ESTIMATES

Change in Disbursement Estimates

Yes

Year	Current	Proposed
2012	0.00	0.00
2013	10,717,802.10	10,717,802.10
2014	4,318,988.83	4,318,988.83
2015	13,404,377.85	13,404,377.85
2016	34,468,860.72	34,468,860.72
2017	50,000,000.00	37,815,416.66
2018	80,000,000.00	60,719,804.44
2019	69,874,442.00	60,000,000.00
2020	0.00	44,000,000.00
2021	0.00	4,554,750.00



**Results framework**

**COUNTRY: Kenya**

**Nairobi Metropolitan Services Improvement Project**

**Project Development Objectives(s)**

The Project Development Objective (PDO) is to strengthen urban services and infrastructure in the Nairobi metropolitan region. This will be achieved by (i) investing in local infrastructure (roads, markets, street lighting, bicycle and pedestrian pathways, drainage, and the like), (ii) investing in large-scale metropolitan infrastructure including supporting improvements in integrated solid waste management, sewerage collection and disposal, and transport, and (iii) strengthening the current and future entities responsible for service delivery, including the central ministry, current local authorities and future county governments, utilities and other service providers, and possible future metropolitan authorities responsible for planning, transport, and other services.

**Project Development Objective Indicators by Objectives/ Outcomes**

Indicator Name	DLI	Baseline	End Target
<b>The Project Development Objective (PDO) is to strengthen urban services and infrastructure in the Na</b>			
Direct project beneficiaries (Number)		0.00	3,200,000.00
<b>Action: This indicator has been Revised</b>			
Female beneficiaries (Percentage)		0.00	50.00
People provided with access to "improved sanitation facilities" under the proj. (CRI, Number)		0.00	14,000.00
<b>Action: This indicator has been Revised</b>			
People provided with access to "improved sanitation facilities" - urban (Number)		0.00	14,000.00



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Indicator Name	DLI	Baseline	End Target
<i>Action: This indicator has been Revised</i>			
Number of people in urban areas provided with access to all-season roads within a 500 meter range under the project (Number)		0.00	350,000.00
<i>Action: This indicator has been Revised</i>			
People in the Nairobi Metropolitan region living within a one kilometer radius of a location for a commuter rail station, benefiting from improved access to that location (Number)		0.00	280,000.00
<i>Action: This indicator has been Revised</i>			

### Intermediate Results Indicators by Components

Indicator Name	DLI	Baseline	End Target
<b>Component 1: Institutional Reform and Planning</b>			
Physical address system prepared for counties (Number)		0.00	3.00
<i>Action: This indicator has been Revised</i>			
Revenue enhancement plans prepared for counties (Number)		0.00	4.00
<i>Action: This indicator has been Revised</i>			
Integrated strategic development plans prepared (Number)		0.00	24.00
<i>Action: This indicator has been Revised</i>			
<b>Component 2: Local Infrastructure and Services</b>			



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Indicator Name	DLI	Baseline	End Target
Drainage systems constructed under the NaMSIP (Kilometers)		0.00	158.00
<i>Action: This indicator has been Revised</i>			
Street and security lights installed (Number)		0.00	1,400.00
<i>Action: This indicator has been Revised</i>			
Markets rehabilitated (Number)		0.00	5.00
<i>Action: This indicator has been Revised</i>			
<b>Component 3: Metropolitan Infrastructure and Services</b>			
Commuter rail stations for which surrounding public infrastructure has been built under the project (Number)		0.00	15.00
<i>Action: This indicator has been Revised</i>			
Roads rehabilitated, Non-rural (Kilometers)		0.00	37.00
<i>Action: This indicator has been Revised</i>			
Plans for land use around commuter rail stations prepared (Number)		0.00	33.00
<i>Action: This indicator has been Revised</i>			
Sewage treatment facility put into operation (Number)		0.00	2.00
<i>Action: This indicator has been Revised</i>			
New household sewer connections constructed under the project (Number)		0.00	1,250.00
<i>Action: This indicator has been Revised</i>			
Volume(mass) of BOD pollution load removed by treatment plant under the project (Tones/year)		0.00	250.00



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Indicator Name	DLI	Baseline	End Target
<i>Action: This indicator has been Marked for Deletion</i>			
ISWM strategy prepared (Number)		0.00	1.00
<i>Action: This indicator has been Revised</i>			
Sanitary landfills operational under the project (Number)		0.00	1.00
<i>Action: This indicator has been Revised</i>			
Quantity of waste disposed at landfills constructed under the project (Tones/year)		0.00	50,000.00
<i>Action: This indicator has been Marked for Deletion</i>			

**Annex: RAP Status**

<b>Subproject</b>	<b>No of Affected Persons</b>	<b>RAP cost</b>	<b>Construction Status</b>	<b>RAP Status</b>	<b>Comments</b>
Karandini Market	204	KES 11.2 million	Relocation site and main market site are under construction (35%)	<p>Substantially completed except for cases with account problems. The RAP implementation consultants provide special assistance to facilitate the compensation process.</p> <p>Continuous monitoring on stakeholder engagement and grievance redress is needed until the final move-back of the traders to the main market.</p>	Construction expected to be completed in Sep. 2019.
Ngong Market	1912	KES 50 million	Relocation site is under construction (8%)	<p>Substantially completed except for cases with account problems. The RAP implementation consultants provide special assistance to facilitate the compensation process.</p> <p>Traders on Ngong bus park who were earlier displaced without compensation are now being accommodated in the RAP for Ngong market.</p> <p>Continuous monitoring on stakeholder engagement and grievance redress is needed until the final move-back of the traders to the main market.</p>	Construction expected to be completed in Dec. 2019.
Juja Market	395	KES 5.6 million	Relocation site is under construction (10%)	<p>Substantially completed except for cases with account problems. The RAP implementation consultants provide special assistance to facilitate the compensation process.</p> <p>Continuous monitoring on stakeholder engagement and grievance redress is needed until the final move-back of the traders to the main market.</p>	Construction expected to be completed in Oct. 2019.



<b>Subproject</b>	<b>No of Affected Persons</b>	<b>RAP cost</b>	<b>Construction Status</b>	<b>RAP Status</b>	<b>Comments</b>
Ruiru Market	647	KES 9 million	Relocation site is under construction (10%)	Substantially completed except for cases with account problems. The RAP implementation consultants provide special assistance to facilitate the compensation process.  Continuous monitoring on stakeholder engagement and grievance redress is needed until the final move-back of the traders to the main market.	Construction expected to be completed in Oct. 2019.
Juja-Thika Sewerage	1 association	KES 780 million (plus KES 100 million administration fee of the National Land Commission)	Under construction following the consent by the seller and expected to be completed before the closing date.	The government has committed to budgeting and releasing adequate funds in the supplementary budget for FY18/19, following which the compensation will be paid.	Constant follow-up on the government counterpart fund release is needed.
Mitubiri landfill	1 organization	KES 135 million	Under construction (5%)	Land acquisition is completed.  Design was changed to secure an additional buffer zone in compliance with the ESIA and to avoid additional land acquisition.	Construction expected to be completed in Oct. 2019.