

Republic of Kenya

MINISTRY OF LABOR AND SOCIAL PROTECTION,
STATE DEPARTMENT FOR SOCIAL PROTECTION AND SENIOR CITIZEN AFFAIRS

and

THE MINISTRY OF EAST AFRICAN COMMUNITY, ARID AND SEMI-ARID
LANDS AND REGIONAL DEVELOPMENT, State Department for the ASALS
and Regional Development (SDARD), NATIONAL DROUGHT MANAGEMENT
AUTHORITY

**Second Kenya Social and Economic Inclusion Project
(P504218)**

Negotiated
**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

May 16, 2025

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement the Second Kenya Social and Economic Inclusion Project (the Project, KSEIP2), with the involvement of the State Department for Social Protection and Senior Citizens Affairs in the Ministry of Labor and Social Protection and the National Drought Management Authority in the Ministry of East Africa Community, the Arid and Semi-Arid Lands (ASALs) and Regional Development as set out in the Financing Agreement (the Agreement). The International Development Association (the Association), has agreed to provide financing for the Project, as set out in the referred Agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Association. Said E&S documents may be revised from time to time with prior written agreement by the Association. As provided for under the referred Agreement, the Recipient shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Association and the Recipient, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Association and the Recipient agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient's [Cabinet Secretary in the Ministry of Labor and Social Protection]. The Recipient shall promptly disclose the updated ESCP.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain a Project Implementation Unit (PIU) with qualified full-time staff and resources to support management of environmental, social, health, safety and security risks and impacts of the Project, including: one experienced EHS Officer and one Social Officer with a strong social background, including social inclusion, grievance and GBV (SEA/SH) management. Designated E&S focal persons under the Directorate of Social Assistance (DSA), Directorate of Children’s Services (DCS), Directorate for Social Development (DSD), National Council of Persons with Disability (NCPWD), SDSP County Coordinators, NDMA County Drought Coordinators; and one Grievance Officer at the Directorate of Social Assistance (DSA).</p> <p>b. Where needed, engage specialists with expertise in specific areas, such as biodiversity, sustainable fishing practices, among others, as required.</p>	<p>Establish the PIU and appoint one EHS Officer and one Social Officer at the PIU, a Grievance Officer at DSA, and appoint the E&S focal points at DSA, DSD, DCS, NCPWD and NSPS, prior to the Project Effective Date, and thereafter maintain the PIU and these positions throughout Project implementation.</p> <p>At the County level the SDSP Coordinators and NDMA County Drought Coordinators will be designated as the E&S focal points at each participating county before effective date and thereafter maintain the positions throughout the Project implementation.</p> <p>When needed to inform preparation and implementation of activity-specific ESMP.</p>	SDSP and NDMA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ol style="list-style-type: none"> 1. Train all Project workers, including community volunteer groups, on the Bank’s ESF, and provisions in the Environmental and Social Commitment Plan (ESCP), Stakeholder Engagement Plan (SEP), Project’s Labor Management Procedures (LMP), SEA/SH Prevention and Response Action Plan, Vulnerable and Marginalized Groups Framework (VGMF), Vulnerable and Marginalized Groups Plan (VMGP), Social Management Plan, Environmental and Social screening procedures, Environmental and Social Management Plan (ESMP), livelihoods interventions’ exclusion list, and Project-wide and workers grievance mechanisms, in form and substance satisfactory to the Association. All capacity building interventions will be held in locations and using formats accessible to all, and information disseminated in languages understandable to all. 2. Train beneficiary households on the activity-specific Environmental and Social Management Plan (ESMP), Project-wide grievance mechanism, community health and safety, as well as emergency preparedness and response under this ESCP, the environmental and social instruments referenced herein and the Environmental and Social Standards, in form and substance satisfactory to the Association. Targeted training for the beneficiaries of Component 2a-b should include the safe use and handling of chemicals (e.g., pesticides, fertilizers, vaccines, and other drugs); fishing restrictions to support sustainable fishing practices; environmental awareness on conservation biodiversity and cultural values in the Tana Delta and Lake Turkana. 3. Train all Project workers on the Project’s Security Management Plan, including on emergency prevention and preparedness and response arrangements to emergency situations. 4. Train Project workers on Occupational Health and Safety (OHS) and SEA/SH Incident Reporting procedure. 5. Train workers on Code of Conduct. 	<ol style="list-style-type: none"> 1. Within 90 days of the Project Effective Date for workers onboarded before effective date, within 90 days of onboarding for workers onboarded after effectiveness and thereafter, undertake refresher training, at least every quarter, during the Project implementation. 2. Before commencement of activities and refresher trainings, during the Project implementation. 3. Before deployment of workers to the ASAL areas, and refresher training during the Project implementation. 4. Within 90 days of Project Effective Date and thereafter, undertake refresher training during the Project implementation. 5. Before deployment of workers to project areas, and refresher training during the Project implementation. 	SDSP and NDMA
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
C	<p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Status of preparation and implementation of E&S documents required under the ESCP, including Labor Management procedures (LMP), Stakeholder Engagement Plan (SEP), Security Management Plan (SecMP), Sexual Exploitation and Abuse and Sexual Harassment Prevention and Response Action Plan, Social Management Plan (SMP), Vulnerable and Marginalized Group Plan (VMGP) and ESMPs. • Summary of stakeholders' engagement activities carried out as per the SEP. • Complaints submitted to the Project's grievance mechanism, updated grievance log, and progress made in resolving them. • E&S performance of contractors and subcontractors as reported through monthly contractors' reports. • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit quarterly and annual reports to the Association throughout Project implementation, commencing after the Effective Date. Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	SDSP and NDMA
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors (mentors, trainers, payment service providers, implementing partners) engaged in the Project to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	<p>Submit the monthly reports to the Association as annexes to the reports to be submitted under action C above and upon request by the Association.</p>	SDSP and NDMA
E	<p>INCIDENTS AND ACCIDENTS</p> <p>Notify the Association of any incident or accident relating to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Association upon request.</p> <p>Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Association, and implement a Corrective Action Plan (CAP) that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.</p>	<p>Notify the Association no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p> <p>Provide review report, and Corrective Action Plan (CAP) to the Association no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Association.</p>	SDSP and NDMA
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS	<p>a. Prepare a template ESMP consistent with applicable ESSs, exclusion criteria for livelihood</p>	SDSP and NDMA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>a. Prepare a template Environmental and Social Management Plan (ESMP) for the Project, exclusion criteria for livelihood intervention activities and Environmental and Social (E&S) screening procedures as part of the Project's Operation Manual (POM) consistent with all the relevant ESSs.</p> <p>b. Prepare and implement site-specific Environmental and Social Management Plans (ESMPs) for subprojects supported under Components 2 and 3 of the Project, consistent with the relevant ESSs. The activities described in the exclusion list set out in Part 1.4 below shall be ineligible to receive financing under the Project.</p>	<p>interventions and E&S screening procedures as an annex to the POM prior to the Effective Date.</p> <p>b. Prior to commencing any livelihood activity under EIP and thereafter implement the site-specific ESMPs throughout activity implementation.</p>	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, site-specific ESMPs, SecMP, SEA/SH Prevention and Response Action Plan, the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors. Thereafter ensure that the contractors comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts.</p> <p>Supervise contractors throughout Project implementation. Copies of relevant contracts shall be provided to the Association upon request.</p>	SDSP and NDMA
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), policy formulation, capacity building, training, and any other technical assistance activities under the Project are carried out in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, ensure that the outputs of such activities comply with the approved terms of reference.</p>	<p>Throughout Project implementation. ToRs for TA activities shall be reviewed and approved by the Bank before commencing TA activities.</p>	SDSP and NDMA
1.4	<p>EXCLUSION LIST</p> <p>The following activities shall not be eligible to receive financing under the Project, as set out in the POM:</p> <ol style="list-style-type: none"> 1. Activities categorized as High risk, per World Bank ESF and ESSs definition as well as per the environmental management and co-ordination act (EMCA). 2. Activities that may cause long term, permanent and/or irreversible adverse environmental impacts (e.g., loss of major natural habitats including habitats of wildlife and fisheries). 3. Activities that may cause adverse impacts on biodiversity conservation and sustainable management of living natural resources. 4. Activities that have a high probability of causing serious adverse effects to human health and/or the environment. 5. Activities that contravene Kenya's obligations under its international agreements. 	<p>Screen EIP activities against the exclusion criteria before commencement of the activities.</p>	SDSP and NDMA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>6. Activities that involve production or trade in pesticides/herbicides subject to international phase-outs or bans.</p> <p>7. Activities that may cause damage to cultural heritage as defined in ESS8.</p> <p>8. Activities that may involve generating large volumes of e-waste causing significant irreversible adverse impacts to human health and natural resources.</p> <p>9. Activities that would disproportionately affect the minority Vulnerable and Marginalized Groups (VMGs).</p> <p>10. Activities that may have significant adverse social impacts and/ or may give rise to significant social conflict.</p> <p>11. Activities that may result in temporary or permanent physical and or economic displacement, and</p> <p>12.</p>		
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of workers relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements for Project workers, and applicable requirements for contractors, subcontractors, and supervising firms.</p> <p>Ensure the Community Health Promoters on the Project receive remuneration equal to the national minimum wage in case they are engaged full-time.</p> <p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers (direct and contracted), including assignment of workers' grievance focal points, as described in the LMP and consistent with ESS2.</p> <p>Establish and operate a separate grievance mechanism for Community workers consistent with ESS 2.</p>	<p>Implement the LMP throughout Project implementation.</p>	SDSP and NDMA
		<p>Establish and operationalize the grievance mechanism for direct and contracted workers, and a separate grievance mechanism for community workers within 90 days of Project Effective Date, and thereafter maintain, publicize and operate it throughout Project implementation.</p>	SDSP and NDMA
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plan (WMP), as part of the site-specific ESMPs prepared for the Project activities, to manage hazardous (including e-wastes) and non-hazardous wastes, consistent with ESS3.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	SDSP and NDMA
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and integrated pest management measures in the template ESMP and site-specific ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	SDSP and NDMA
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage road safety risks to community members arising from use of vehicles in the Project, in the ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	SDSP and NDMA
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, handling of agrochemicals, use of security personnel, response to emergency situations, and include mitigation measures in the site-specific ESMPs to be prepared in accordance with POM.	Same timeframe as for the preparation and implementation of the site-specific ESMPs.	SDSP and NDMA
4.3	SEA AND SH RISKS Prepare and implement the SEA/SH Prevention and Response Action Plan to assess and implement measures to manage the risks of SEA and SH.	Implement the SEA/SH Action Plan throughout Project implementation.	SDSP and NDMA
4.4	SECURITY MANAGEMENT Undertake a Security Risk Assessment (SRA) and implement measures to manage the security risks of the Project, including the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the Security Management Plan,	Adopt the Security Management Plan (SecMP) before the Effective Date and thereafter implement it throughout Project implementation.	SDSP and NDMA
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	Not currently relevant to the project.		
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	BIODIVERSITY RISKS AND IMPACTS Prepare and implement Biodiversity Management Measures as part of the site-specific ESMPs under action 1.1 above, and consistent with ESS6. Screen activities under Components 2a and 2b, prepare, consult on, adopt, publicly disclose, site-specific ESMPs with relevant mitigation measures for activities that are likely to have impacts on biodiversity and thereafter implement such ESMPs.	Same timeframe as 1.1.	SDSP and NDMA
ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
7.1	<p>VULNERABLE AND MARGINALIZED GROUPS (FRAMEWORK AND PLANS)</p> <p>1) Update and implement the KSEIP Social Assessment (SA), including a Social Management Plan (SMP), for the Project consistent with ESS7. The SA will identify the barriers to access and potential detrimental impacts of the proposed reforms, inclusion of PWDs, minority VMGs, young mothers, challenges pertaining to acquisition of legal documents and accessing payment service providers and the appropriate mitigation measures.</p> <p>2) Update the Vulnerable and Marginalized Groups Framework (VMGF) prepared under KSEIP for the Project, consistent with ESS7.</p> <p>3) Consult on the VMGF with minority VMG communities, their leadership and organizations that represent their interests and prepare and implement the community- specific VMGPs, including an engagement strategy consistent with ESS7.</p>	<p>1) Update within 90 days of Project Effective Date and thereafter implement the SA/SMP throughout Project implementation.</p> <p>2) Consult on the VMGF with minority VMGs, their leadership and organizations that represent their interests, within 90 days of Project Effective Date and implement the respective community specific VMGPs throughout Project implementation.</p> <p>3) Implement the VMGF throughout Project implementation.</p>	SDSP and NDMA
ESS 8: CULTURAL HERITAGE			
8.1	Consistent with ESS8, prepare, disclose, and implement site-specific ESMPs for activities under component 2. As part of activity-specific ESMP awareness, train the project beneficiaries of fishing activities along Lake Turkana and Tana River delta on sustainable fishing practices and cultural values within the project areas.	Same timeframe as 1.1.	SDSP and NDMA
ESS 9: FINANCIAL INTERMEDIARIES [This standard is only relevant for Projects involving Financial Intermediaries (FIs).]			
9.1	Not currently relevant to the project.		
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Prepare and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, and intimidation. The SEP shall be updated, when necessary, throughout Project implementation to reflect any adjustment in Project activities and actors, as well as the views of beneficiaries and other relevant stakeholders.</p>	Implement the SEP throughout Project implementation.	SDSP and NDMA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Prepare a detailed write-up of the Project grievance mechanism including the “e-GCM processes” and recommendations from the “KSEIP 1 GM Assessment”, in a form and substance satisfactory to the Association.</p> <p>Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p> <p>Describe in the VMGF, VMGP, SA and SEP, the grievance mechanism to address complaints submitted by minority VMGs. The project GM will be culturally appropriate and accessible to VMGs and considers the availability of judicial recourse and customary dispute settlement mechanisms among VMGs.</p>	<p>Prior to the effective date.</p> <p>Establish the grievance mechanism within 90 days of the Project Effective Date and maintain and operate the mechanism throughout Project implementation.</p>	SDSP and NDMA
<p>INDICATORS FOR IMPLEMENTATION READINESS</p> <p>The following actions are indicators for implementation readiness:</p> <p>A a</p> <p>1.1 a,</p> <p>4.4,</p> <p>10.2,</p>			