

# **Republic of Kenya**

**Kenya National Highways Authority (KeNHA),  
Kenya Revenue Authority (KRA), Information and  
Communication Authority (ICTA), National Transport and  
Safety Authority (NTSA), State Department of Transport  
(SDoT) and State Department of Roads (SDoR)**

## **Second Horn of Africa Gateway Development Project (P515510)**

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

**Negotiated Version**

**March 09, 2026**

## ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Kenya (the Recipient) will implement the Second Horn of Africa Gateway Development Project (the Project), with the involvement of the Kenya National Highways Agency (KeNHA), Kenya Revenue Authority (KRA), Information and Communication Authority (ICTA), National Transport and Safety Authority (NTSA), State Department of Transport (SDoT) and State Department of Roads (SDoR), 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 Agreement. This ESCP shall apply to applicable activities under the financing for the Project referred to above.
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 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 Recipient through the Project Coordinator of the Project Management Office, under the State Department for Roads, and the Association, agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Recipient. 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
<b>IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT</b>			
A	<p><b>ORGANIZATIONAL STRUCTURE</b></p> <p>a. KeNHA shall maintain the existing HoAGDP Project Implementation Team (PIT) with qualified staff and resources to support management of environmental, social, health and safety (E&amp;S) risks and impacts of the Project including a Social Specialist, an Environmental Specialist, an Occupational Health and Safety (OHS) specialist, and a stakeholder engagement specialist. NTSA and ICTA shall each maintain the existing HoAGDP-PITs each with one Environmental Risk Management Expert and one Social Risk Management Expert.</p> <p>b. KRA shall second/deploy/recruit one full-time Environmental Risk Management Expert and one full-time Social Risk Management Expert to be part of its PIT</p> <p>c. KeNHA shall enter into contract agreement with a Consortium of Civil Society Organizations (CSOs) to manage social risks and impacts of the Modogashe-Samatar and Rhamu-Mandera road sections including management of SEA/SH risks, community consultations and stakeholders' engagement.</p> <p>d. KeNHA, ICTA and KRA shall require contractors and supervision consultants, each to have, on a full-time basis, suitably qualified staff and resources to respectively support implementation and oversight of the C-ESMPs including a Social Specialist; an Occupational Safety and Health Specialist; and an Environmental Specialist. Additionally, KeNHA shall require each road contractor to have, at minimum, three (3) community liaison officers (CLOs) to cover their areas of operations., confirm adequacy and scale CLO staffing relative to active work fronts, social context, and security constraints.</p> <p>d. KeNHA shall recruit a firm of biodiversity experts, in line with terms of reference (ToR) acceptable to the Association, to undertake monitoring of Biodiversity Management Plan (BMP) implementation on a quarterly basis.</p>	<p>Maintain the PITs and these positions throughout the Project implementation.</p> <p>b. No later than 90 days after Project effective date and maintain the positions throughout the Project</p> <p>c. Enter into contract with Consortium of Civil Society Organizations prior to commencement of construction activities.</p> <p>d. During the tendering process but onboarding no later than 30 days after contract signing.</p> <p>e. Before commencement of work under Part A1.</p>	<p>KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p><b>CAPACITY BUILDING PLAN/MEASURES</b></p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> <li>• Training for all PIT staff, Project workers and Contractors on stakeholder identification, mapping and engagement, grievance redress mechanism, specific aspects of environmental and social assessment, emergency preparedness and response, community health and safety, and biodiversity management.</li> <li>• Training security personnel on relationships with the community, the requirements of ESS4, and the Code of Conduct.</li> </ul>	<p>Provide capacity building before commencement of any civil works on the two road sections and thereafter refresher training, at least every quarter, throughout the Project</p>	<p>KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.</p>
<b>MONITORING AND REPORTING</b>			
C	<p><b>REGULAR REPORTING</b></p> <p>Each implementing agency shall Prepare and submit to the Association regular quarterly and annual monitoring reports on the environmental, social, health and safety (E&amp;S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> <li>• Status of preparation and implementation of E&amp;S documents required under the ESCP.</li> <li>• Summary of stakeholder engagement and consultation activities, including community health and safety sensitizations, carried out as per the Stakeholder Engagement Plan.</li> <li>• Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them.</li> <li>• Status of implementation of the RAPs and livelihood restoration activities</li> <li>• E&amp;S performance of contractors and subcontractors as reported through quarterly contractors' and supervision firms' reports.</li> <li>• Status of resolution of incidents and accidents reported under action E below.</li> <li>• Implementation status of contractors' ESMPs</li> <li>• Statutory improvement orders, if any, and status of their implementation.</li> <li>• Status of E&amp;S performance of Project associated facilities.</li> <li>• Status of implementation of BMP</li> </ul>	<p>Submit quarterly and annual reports to the Association following Project effectiveness date and throughout Project implementation</p> <p>Submit each report to the Association no later than 30 days after the end of each reporting period.</p>	<p>KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.</p>
D	<p><b>CONTRACTORS' MONTHLY REPORTS</b></p> <p>Require contractors and supervising firms to provide joint monthly monitoring reports on E&amp;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 progress reports to the Association upon request.</p>	<p>KeNHA, ICTA and KRA.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
E	<p><b>INCIDENTS AND ACCIDENTS</b></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; 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 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 detailed review and investigation report and Corrective Action Plan to the Association no later than 10 days following the submission of the initial notice, or as agreed in writing with the Association based on incident complexity.</p>	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
<b>ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS</b>			
1.1	<p><b>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</b></p> <p>1. KeNHA shall update baseline information, reference E&amp;S standards, impact assessment and mitigation measures, re-disclose and implement the Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs.</p> <p>2. KeNHA shall update baseline information, road design details, reference E&amp;S standards, impact assessment and mitigation measures, re-disclose and implement Environmental and Social Impact Assessments (ESIAs) for Modogashe – Samatar Road Section and for Rhamu- Elwak Road section, consistent with relevant ESSs, and extend validity of the respective EIA licenses.</p> <p>3. KeNHA shall undertake supplementary biodiversity assessment for Rhamu-Mandera road section and update BMPs for both Modogashe – Samatar Road and Rhamu- Mandera Road sections, consistent with relevant ESSs.</p> <p>4. KeNHA, ICTA and KRA shall each require appointed contractors to prepare Environmental and Social Impact Assessment (ESIA) or Environmental and Social Management Plan (ESMP) for auxiliary facilities, as set out in the ESMF, and thereafter implement the respective ESMPs throughout the Project.</p>	<p>1. Update and re-disclose the ESMF no later than three months after Project effective date and thereafter implement the ESMF throughout Project implementation.</p> <p>2. Update the ESIAs prior to commencement of civil works under Part A of the Project and thereafter implement the ESIAs throughout Project.</p> <p>3. Prior to commencement of civil works under Part A of the Project and thereafter implement the BMP throughout the Project.</p>	KeNHA, ICTA and KRA

	MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
	<p>5. KeNHA, ICTA and KRA shall each require contractors to prepare Construction Environmental and Social Impact Assessment (C-ESMP) for each road section and the Supervision Consultant to review and approve the C-ESMP prior to mobilization and supervise implementation.</p> <p>6. KeNHA shall ensure that Contingent Emergency Response Component (CERC) Manual specified in the Agreement includes a description of E&amp;S assessment and management arrangements for implementation of any CERC activities, in accordance with the ESSs.</p>	<p>4. Incorporate the requirements of ESIA/ESMP for auxiliary facilities in the bidding documents for the respective subprojects. Once finalized, implement the respective ESMP throughout Project implementation.</p> <p>5. Incorporate the requirements for C-ESMP in the bidding documents, approve C-ESMP before contractor mobilization and monitor implementation throughout the Project.</p> <p>6. Prior to disbursement for CERC under Category 8.</p>	
1.2	<p><b>MANAGEMENT OF CONTRACTORS</b></p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, ESIA, ESMP, the Labor Management Procedures (LMP), Stakeholders Engagement Plan (SEP) and code of conduct, into the E&amp;S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter, ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&amp;S specifications of their respective contracts. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Association.</p>	<p>As part of the preparation of procurement documents and respective contracts and supervise contractors throughout Project implementation.</p> <p>Submit copies of relevant contracts provided to the Association upon request.</p>	KeNHA, ICTA and KRA
1.3	<p><b>TECHNICAL ASSISTANCE</b></p> <p>All implementing agencies shall carry out consultancies, studies (including feasibility studies), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Association, that are consistent with the ESSs. Thereafter, prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	Throughout the Project.	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.5	<p><b>ASSOCIATED FACILITIES</b></p> <p>For the existing associated facilities under HoAGDP (Elwak-Rhamu and Samatar-Wajir Road sections) update some E&amp;S instruments including the LMP and SEA/SH action plan to meet ESF requirements through retrofitting.</p> <p>Monitor and report on progress of E&amp;S risks and impacts management of the socioeconomic infrastructure associated facilities along Kotulo-Rhamu and Rhamu-Mandera sections, consistent with the relevant ESSs. KeNHA shall establish a corridor-wide coordination mechanism to facilitate information sharing on associated facilities and consistent application of relevant ESS. Status update will be included in the regular reports to the Association referred to in Part C above.</p>	<p>Update instruments no later than three months of Project effectiveness</p> <p>Throughout the Project.</p>	KeNHA and KRA
<b>ESS 2: LABOR AND WORKING CONDITIONS</b>			
2.1	<p><b>LABOR MANAGEMENT PROCEDURES</b></p> <p>Prepare, disclose and adopt Labor Management Procedures (LMP) including the code of conducts (COCs) for SEA/SH prevention for the Project applicable to all implementing agencies.</p>	<p>Adopt LMP prior to Project effective date and thereafter implement the LMP throughout the Project.</p>	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
2.2	<p><b>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</b></p> <p>Require contractors, through contractual obligations, to prepare and implement OHS Management Measures in accordance with the ESMF, ESIA and ESMPs and General and other relevant World Bank Group (WBG) EHS Guidelines. Contractors prepare, implement, and maintain OHS measures as part of the C-ESMP; and the Supervision Consultant review and approve C-ESMP and supervise implementation.</p>	<p>Prior to commencement of any civil works and thereafter implement the plan throughout Project.</p>	KeNHA, ICTA and KRA
2.3	<p><b>GRIEVANCE MECHANISM FOR PROJECT WORKERS</b></p> <p>Establish and operate a functional grievance mechanism for all Project workers, as described in the LMP and consistent with ESS2. Require contractors and consultants, through contractual obligations, to adopt the Project grievance mechanism for all their workers posted in the Project.</p>	<p>Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.</p>	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
<b>ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b>			
3.1	<p><b>WASTE MANAGEMENT PLAN</b></p> <p>Required contractors to prepare and implement a Waste Management Plan (WMP), as part of the C-ESMP prepared for the Project, to manage hazardous and non-hazardous wastes, consistent with ESS3. Contractors prepare, implement, and maintain WMP as part of the C-ESMP; and the Supervision Consultant review and approve C-ESMP and supervise implementation.</p>	<p>Same as 1.1 (5)</p>	KeNHA, KRA and ICTA.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	KeNHA ensures contractual incorporation of WMP obligations and supervises implementation through the Engineer.		
3.2	<b>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</b> Incorporate resource efficiency and pollution prevention and management measures in the updated ESMF, ESIA's and the C-ESMP to be prepared under action 1.1 above.	Same as 1.1 (5)	KeNHA, KRA and ICTA
<b>ESS 4: COMMUNITY HEALTH AND SAFETY</b>			
4.1	<b>TRAFFIC AND ROAD SAFETY</b> Require contractors to develop and implement traffic and road safety management plan as part of the Contractor's ESMP to be prepared under action 1.1 above.	Same as 1.1 (5)	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
4.2	<b>COMMUNITY HEALTH AND SAFETY</b>  a. KeNHA, KRA and ICTA shall require contractors to prepare and implement Community Health and Safety Plan, consolidating all actions to manage risks and impacts related to road traffic safety, transportation of materials and equipment, use of security personnel, and management of waste and hazardous materials in line with ESSs, WBG General and Toll Road EHS Guidelines. The plan will also include measures to minimize the risk of social conflict and GBV and prevent the spread of communicable diseases due to potential Project induced labor- influx  b. KeNHA shall require contractors and supervision consultants to undertake periodic awareness creation among communities along the two road sections on various community health and safety issues and planned prevention measures, including on emergency response drills.  c. KeNHA shall prepare and adopt operation-phase community health and safety management plan for the Project roads, including pedestrian safety, roadside settlements and schools, community exposure to dust/noise, hazardous materials spills, lighting at crossings/bus stops, behavior of road maintenance contractors, and emergency response measures, consistent with the relevant ESSs and WBG General and Toll Road ESHS Guidelines, and ensure the same are implemented by appointed road maintenance contractors.	a. Same as 1.1 (5)  b. As part of the preparation of procurement documents and respective contracts and supervise implementation throughout the Project.  c. Prior to commissioning the road; implement and maintain throughout road operation phase.	KeNHA, KRA and ICTA
4.3	<b>SEA AND SH RISKS</b>  Prepare and implement a SEA/SH Prevention and Action Plan to assess and manage the risks of SEA and SH, including survivor-centered GRM.	Prepare the SEA/SH Action Plan prior to Project effective date and thereafter implement throughout Project.	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.4	<p><b>SECURITY MANAGEMENT</b></p> <p>1. Implement measures to manage the risks of engaging security personnel to safeguard project workers, sites, assets, and activities as set out in the Project’s Security Risk Assessment and Management Plan (SRAMP), Security Management Plan, ESIA’s, and C-ESMP.</p> <p>2. Implement standards, protocols, and/or codes of conduct for the selection and assignment of armed personnel to the Project, including to verify that assigned individuals have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force, in line with ESSs.</p> <p>3. Provide adequate instruction and training to the security personnel, prior to deployment and on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Security Management Plan, MoU and sub-project specific C-ESMPs.</p> <p>4. Ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include communication on the involvement of the security personnel in the Project.</p> <p>5. Ensure that any concerns or grievances regarding the conduct of security personnel are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project’s grievance mechanism, which shall facilitate its resolution, in accordance with ESS4 and ESS10. Notify the Association after receiving concern or grievance, as set out under action E above.</p>	<p>1. Throughout the Project</p> <p>2. Prior to deployment of Security Personnel and on a regular basis</p> <p>3. Prior to deployment of security personnel and on a regular basis</p> <p>4. During the preparation of SEP</p> <p>5. Throughout project implementation</p>	KeNHA, ICTA and KRA
<b>ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT</b>			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p><b>RESETTLEMENT FRAMEWORK AND PLANS</b></p> <p>1. Update, re-disclose and implement a Resettlement Policy Framework (RPF) for the Project to include ESF requirements, consistent with ESS5.</p> <p>2. Update, re-disclose and implement Resettlement Action Plans (RAPs) for Modogashe-Samatar and Rhamu-Mandera road sections, consistent with ESS5. Ensure Project affected people are provided with full compensation at replacement cost and any other assistance, in accordance with the RAPs and ESS5.</p> <p>3. Prepare, disclose, and implement a Livelihood Restoration Plan (LRP) for Project Affected Persons (PAPs) whose livelihoods are significantly impacted (if any) as part of the RAPs.</p>	<p>1. Update and re-disclose the RPF not later than three months after Project effective date and thereafter implement the RPF throughout the Project.</p> <p>2. Update, redisclose and implement the RAPs prior to commencement of civil works under Part A of the Project.</p> <p>3. Prepare, disclose and implement the LRP as part of the RAPs.</p>	KeNHA and KRA
<b>ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</b>			
6.1	<p><b>BIODIVERSITY RISKS AND IMPACTS</b></p> <p>KeNHA shall undertake a supplementary biodiversity assessment for Rhamu-Mandera road section, update BMP for both road sections and implement the Biodiversity Management Plan (BMP) as part of the C-ESMPs, consistent with ESS6. The BMP shall include a standalone section on Biodiversity Monitoring and Evaluation Plan (BMEP) that will demonstrate the delivery of no net loss of critical habitats in the two road segments.; and measures for managing of the risks associated with the introduction and spread of invasive alien species identified in the biodiversity assessment. Monitoring of the BMP will be regularly undertaken by a firm of biodiversity experts indicated in part 1.1 above.</p> <p>KRA and ICTA shall ensure that ESIA's for their respective subprojects are undertaken, consistent with ESS6.</p>	<p>Update the BMP prior to commencement of civil works under Part A of the Project and thereafter implement the BMP throughout the Project.</p> <p>Same as 1.1 above</p>	KeNHA, KRA and ICTA
<b>ESS 7: INDIGENOUS PEOPLES/SUB-SAHARAN AFRICAN HISTORICALLY UNDERSERVED TRADITIONAL LOCAL COMMUNITIES</b>			
7.1	<p><b>INDIGENOUS PEOPLES PLAN</b></p> <p>1. Prepare and disclose Vulnerable and Marginalized Group Plan (VMGP) informed by and re-organizing the Social Assessment (SA) prepared for HoAGDP, in line with ESS7 requirements.</p>	<p>1. Prepare and disclose the VMGP within 30 days of Project effectiveness and implement throughout the project.</p> <p>2. Implement the socio-economic infrastructure of subprojects throughout the Project.</p>	KeNHA and KRA

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	2. KeNHA through Africa Development Bank implement the socio-economic infrastructure subprojects along Modogashe-Samatar and Rhamu-Mandera identified in the VMGP to enhance access to basic social services, consistent with ESS7. Monitor and report to the Association on implementation of socio-economic infrastructure subprojects as part of the regular reporting in Part C.		
<b>ESS 8: CULTURAL HERITAGE</b>			
8.1	<b>CHANCE FINDS</b> Describe and implement the chance find procedures, as part of the C-ESMP of the subprojects under the Project.	Describe the chance find procedures in the updated ESIA's and C-ESMPs and implement the procedures throughout Project.	KeNHA, KRA and ICTA
<b>ESS 9: FINANCIAL INTERMEDIARIES</b>			
9.1	<b>ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)</b> Not applicable		
<b>ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE</b>			
10.1	<b>STAKEHOLDER ENGAGEMENT PLAN</b> Update and implement a 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.	Update the SEP no later than 30 days after project effective date and thereafter implement the SEP throughout the Project.	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
10.2	<b>PROJECT GRIEVANCE MECHANISM</b> 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.  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.	Establish Project-level GM and publicize it in the project areas prior to commencement of civil works under Part A of the Project and thereafter maintain and operate the mechanism throughout Project implementation.	KeNHA, ICTA, KRA, NTSA, SDoR and SDoT.
<b>INDICATORS FOR IMPLEMENTATION READINESS</b>			
The following actions are indicators for implementation readiness (to be met prior to commencement of civil works under Part A of the Project).			
<ol style="list-style-type: none"> <li>1. PIT fully staffed with qualified E&amp;S specialists acceptable to the Association (Section A).</li> <li>2. Updated ESMF and RPF consulted upon, disclosed, and adopted (Section 1.1 and 5.1).</li> <li>3. ESIA's and BMP for Modogashe-Samatar and Rhamu-Mandera road sections updated prior to commencement of civil works under Component A of the Project</li> <li>4. Updated RAPs consulted upon, adopted, disclosed and fully implemented prior to commencement of civil works under Part A of the Project (Section 5.1)</li> <li>5. Final SEA/SH Prevention and Action Plan adopted (Section 4.3), including survivor-centered GRM.</li> </ol>			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> <li>6. LMP adopted and workers' GM established (Section 2.1–2.3).</li> <li>7. Project-level GM established, staffed, and publicly announced in project areas (Section 10.2).</li> <li>8. Updated SEP consulted upon, adopted and disclosed (Section 10.1).</li> </ul>		