



Kenya National Highways Authority

Quality Highways, Better Connections

THE GREAT RIFT ECONOMIC DEVELOPMENT CORRIDOR (BIRETWO-ARROR-CHESONGOCH (B126) ROAD AND ASSOCIATED SPUR ROADS



STAKEHOLDER ENGAGEMENT PLAN FOR THE PROPOSED ROAD UPGRADING OF BIRETWO - ARROR – CHESONGOCH, NYARU – KIMWARER – KAPKAYO, AND KIMWARER – EMSEA IN ELGEYO MARAKWET.

JULY 2026

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ACRONYMS

AfDB	African Development Bank
ASAL	Arid and Semi-Arid Lands
CBO	Community-Based Organization
CSOs	Civil Society Organizations
ESCP	Environmental and Social Commitment Plan
ESF	Environment and Social Framework
ESMP	Environmental and Social Management Plan
ESS	Environment and Social Standards
FGD	Focus Group Discussion
GBV	Gender-Based Violence
GoK	Government of Kenya
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IA	Implementing Agency
KenHA	Kenya National Highways Authority
M&E	Monitoring and Evaluation
NEMA	National Environment Management Authority
NGAO	National Government Administration Office
NGO	Non-Governmental Organization
NLC	National Land Commission
PAP	Project Affected Persons
PIU	Project Implementation Unit
PWD	Person With Disability
RE	Resident Engineer
SDoR	State Department of Roads
SDoT	State Department of Transport
SEP	Stakeholder Engagement Plan
SOP	Standard Operation Procedure
WRA	Water Resources Authority

EXECUTIVE SUMMARY

A. Project Description and Scope

The Kenya National Highways Authority is undertaking preparation for the Great Rift Economic Development Corridor which encompasses the Biretwo - Arror - Chesongoch (B126) Road and Associated Spur Roads. The road sections form a critical link between the busy Eldoret – Malaba (A8) highway and the Kenya-Sudan Link Road; both of which promote and facilitate a regional economic integration with Kenya and her neighbours Uganda and South Sudan.

The proposed Biretwo–Arro–Chesongoch (B126) Road and Associated Spur Roads Project comprises of the improvement and upgrading of a primary corridor road together with its associated spur roads within Uasin Gishu and Elgeyo Marakwet Counties, located in the North Rift Region of Kenya’s classified road network.

Phase 1 of the project includes the improvement of three road sections, namely the Biretwo–Arro–Chesongoch Road (B126) and two associated spur roads, Nyaru–Kapkayo Road (B124) and Kimwarer–Emsea Road (B122). The Biretwo–Arro–Chesongoch (B126) Road starts at Biretwo, located along the Iten–Kabarnet Road, at approximately 0°32'13"N, 35°33'26"E, and proceeds in a generally north-easterly direction through Arro before terminating at Chesongoch, located at approximately 1°07'06"N, 35°38'35"E, within Elgeyo Marakwet County.

The Nyaru–Kapkayo Road (B124) commences at Nyaru, which is located along the Eldoret–Eldama Ravine Road, at approximately 0°19'32"N, 35°34'29"E, and extends eastwards to Kapkayo, located at approximately 0°18'50"N, 35°42'28"E. The Kimwarer–Emsea Road (B122) starts at Kimwarer, located at approximately 0°18'48"N, 35°37'58"E, and terminates at Emsea, which is located along the Iten–Kabarnet Road, at approximately 0°27'09"N, 35°37'48"E. These spur roads provide critical connectivity between the main B126 corridor, the Kerio Valley region, and surrounding rural settlements. See Figure 1 illustrating the proposed project layout and areas.

Project Development Objectives: The Biretwo-Arror-Chesongoch Road(B126) and its associated spur roads aims to address critical transportation challenges and stimulate socio-economic development in Elgeyo -Marakwet County. The current unpaved road faces structural accessibility issues, hindering economic activities and posing challenges to security and tourism. The other objectives include:

- a) Enhance Agricultural Connectivity: Facilitate the transport of agricultural produce to markets.
- b) Improve Security Infrastructure: Upgrading of the proposed road will support security forces in addressing regional insecurity issues.
- c) Boost Regional Economic Growth: Reduce travel time and vehicle maintenance costs, foster economic activities and trade within the county and neighbouring counties.
- d) Promote Tourism: Enhance accessibility to the Rimoi National Reserve, contributing to tourism development and generating revenue for both the National and County Government of Elgeyo Marakwet.

B. Key Environmental and Social Risks Requiring Stakeholder Engagement

In line with the requirements of the African Development Bank Integrated Safeguards System (ISS) and OS 10 Guidelines stakeholder engagement is a cross-cutting responsibility across all safeguard areas. It is particularly critical in addressing environmental and social risks that are likely to result in significant impacts, generate community concern, or require participatory mitigation measures.

Based on field assessments and stakeholder consultations conducted along the proposed project corridor, the following key environmental and social risks have been identified as requiring structured, continuous, and inclusive stakeholder engagement throughout the project lifecycle.

- i. Land acquisition and involuntary resettlement present a major risk, particularly where the road alignment traverses privately owned land, communal grazing areas, and settlements with unclear tenure arrangements. These impacts may result in physical and economic displacement, loss of assets, and disputes over land ownership.
- ii. Livelihood disruption is also anticipated, especially among pastoralist and agro-pastoralist communities, roadside traders especially in Nyaru and Biretwo junction whose livelihoods depend on access to grazing land, water sources, and seasonal mobility.
- iii. Gender-related risks, including gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH), are expected to increase due to labor influx and changing social dynamics. Women, girls, and vulnerable groups were engaged through safe, inclusive and targeted engagement approaches.
- iv. The influx of construction workers may also pose risks to community health and safety, including the spread of communicable diseases such as HIV/AIDS, increased pressure on local health services, and potential social tensions between workers and host communities.
- v. Community health and safety risks associated with construction activities such as increased traffic, dust emissions, and noise are also significant, particularly in densely populated settlements and near schools and trading centers.
- vi. Environmental risks, including soil erosion (especially in escarpment areas), potential landslides, vegetation loss, and potential contamination of water sources, require close collaboration with local communities who depend directly on natural resources.
- vii. Impacts on cultural heritage, including sacred sites, burial grounds, and culturally significant landscapes, have also been identified as a potential risk.
- viii. Vulnerable and marginalized group including women, the elderly, persons with disabilities, and minority clans face a heightened risk of exclusion from project benefits and decision-making processes.
- ix. Grievance management remains a critical area, as unresolved complaints related to land acquisition, employment, or contractor conduct may escalate into disputes if not addressed promptly. addressed, and resolved in a timely and transparent manner.
- x. Community expectations regarding employment opportunities, local procurement, and community social requests.

C. Main Stakeholder Groups Identified

For the proposed road project stakeholders include the following categories of persons or institutions:

1. Primary Stakeholders/Affected Parties: These are groups that will be directly affected (positively or negatively) by the project.

- The Project Developer- KeNHA
- Immediate residents/ community members who may be affected by project activities directly such as
 - Pastoral Communities,
 - Affected Households
 - Businesses and Traders
 - Public institutions in the vicinity of the project
- Project-affected people: Individuals, households, and businesses directly impacted by land acquisition and project activities
- Project Area Administration Personnel, i.e., National Government Administrative Officials (NGAOs), i.e., Deputy County Commissioner, Assistant County Commissioners, Chiefs, Assistant Chiefs, Village / Council of Elders
- Community-based organizations, and local women and youth groups
- National and local government bodies that are responsible for infrastructure development, and economic and social welfare
- Vulnerable and Marginalized Groups: Including women, youth, elderly, persons with disabilities, and minority ethnic groups

2. Secondary Stakeholders/ Interested Parties: These groups are interested in the project but are indirectly impacted by the project.

- Institutions, groups, and individuals who are involved in approving/implementing aspects of the project:
 - County Government of Elgeyo Marakwet and its various departments
 - National Government Parastatals such as KWS, NEMA, KFS, NLC among others
- Academic institutions,
- The local healthcare facilities
- The local security agencies
- NGOs active in the area

D. Summary of Consultations Undertaken

Extensive Public Participation was carried out during the design stage to ensure the public opinion and ideas are implemented in the project design. The relevant consultations were undertaken in the month of August and December 2025, and April 2026. The study engaged the stakeholders through public barazas(8no.), Key stakeholder interviews(11no.), focus group discussions(24no.) and sampled Baseline Household survey questionnaires (using Kobo collect software). A total of No.366(M=259, F=106) for key leaders meeting(7no.), No.1497 (M=917, F=580) for community barazas, and over No. 18 FGDs with about 30 people from each group (youth, women and men). Overall, the gender representation in the meetings was at ~60%male and ~40% female.

In addition to community-level consultations, the project also undertook engagement with the taken with county and national-level institutions, including agencies responsible for land acquisition, environmental

regulation, wildlife conservation, ministry of transport and infrastructure, local administration, security and project implementation. These engagements included consultations with institutions such as the National Land Commission, NEMA, Kenya Wildlife Service, Kerio Valley Development Authority, County Government departments, National Government Administration Officers and security actors. The SEP also recognises separate consultations undertaken to inform the Livelihood Restoration Plan, particularly on livelihood disruption, affected traders, vulnerable PAPs and restoration options. Security and conflict-related concerns, including cattle rustling, banditry and access risks in sections of the corridor such as Chesongoch, have also been incorporated to support conflict-sensitive engagement and the preparation of appropriate implementation safeguards.

Summary of Engagements Undertaken:

Consultation Category	No.
NLC	3
KWS	1
Governor	1
Key County Government Leaders' Meeting	7
Community meetings-Barazas	8
FGDs	24
KII	11
Total	55

E. Summary of Key Concerns Raised and Responses

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
1.	Concerns regarding land acquisition and potential loss of ancestral land.	Land acquisition will be undertaken in accordance with the Resettlement Action Plan (RAP), consistent with national legislation and the African Development Bank's safeguard requirements. All affected persons will be identified, and compensation and livelihood restoration measures will be implemented prior to displacement through NLC.
2.	Lack of designated livestock crossing points, posing risks to animals and road users	The project design will incorporate appropriate livestock crossing points and related safety features, informed by community consultations and Road Safety Awareness creation will be emphasized.
3.	Increased risk of gender-based violence (GBV), Sexual harassment and exploitation, together with Child Abuse associated with influx of construction workers	- The Contractor will implement a GBV Action Plan, Child Protection Strategy, including Codes of Conduct for workers, awareness programs, confidential reporting mechanisms, and referral pathways aligned with national systems and AfDB requirements. - Local residents and youth will be prioritized for unskilled and semi-skilled jobs during construction, subject to contractor requirements and labour laws.
4.	Limited employment opportunities for local youth	The project will promote local employment opportunities through fair and transparent recruitment processes, with

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
		preference given to qualified local labor in line with applicable labor laws and AfDB standards at 70%.
5.	Potential soil erosion and landslides due to construction activities in steep terrain	The project will integrate erosion control and slope stabilization measures into design and construction, including drainage management, climate resilience and structural interventions, in accordance with the Environmental and Social Management Plan (ESMP).
6.	Disruption of roadside businesses and livelihoods during construction	Temporary economic displacement will be addressed in the RAP, including compensation and livelihood restoration measures for eligible affected persons, in line with AfDB safeguard requirements.
7.	Dust emissions affecting nearby households and vulnerable populations	The Contractor will implement mitigation measures as outlined in the ESMP, including dust suppression, traffic management, and continuous monitoring to minimize health impacts.
8.	Risk of exclusion of vulnerable and marginalized groups from consultations and project benefits	The project will ensure inclusive stakeholder engagement through targeted consultations and implementation of measures to enhance participation and benefit-sharing for vulnerable and marginalized groups, consistent with AfDB operational safeguards.
9.	Road safety concerns, particularly for school-going children and other vulnerable road users	Road safety measures will be incorporated into project design and implementation, including signage, speed calming infrastructure, and community awareness programs, in line with a recommendation to have a Road Safety Awareness Program for the project.
10.	Potential disruption of water sources and irrigation infrastructure	The project will avoid or minimize impacts on water resources through careful design such as installation of access culverts. Where impacts are unavoidable, affected infrastructure will be restored or improved in consultation with users/community.
11.	Community Liaison Officers to be recruited from the community.	Request was noted and the recommendation has been outlined in the ESMP.
12.	Raised concern about elephants in the region and some roaming the households/road corridor.	The consultant acknowledged the presence of elephants, noting the project's proximity to Rimoi National Reserve. Mitigation measures will include wildlife warning signage, speed reduction zones, designated crossing points, and community sensitization to reduce human-wildlife conflict and vehicle collisions. Consultation with Kenya Wildlife Service (KWS) will also be undertaken for collaboration on appropriate mitigation measures.
13.	Community requested for several Access roads linking to markets, public infrastructure like schools, hospitals and other areas.	Access roads to public institutions such as schools, health facilities, and markets will be assessed during the detailed design phase. Feasible improvements within the project scope will be considered. This request will also be submitted to KeNHA for consideration during construction.

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
14.	Concern: There was a massacre in 1992, and the victims were buried along the road corridor. Inquired whether there will be a cost for exhumation and reburial. (at Sambirir Ward)	The project acknowledges the sensitivity of this concern. Any gravesites identified within the road corridor will be handled with dignity and respect. The cost of exhumation and reburial, including cultural or religious rites, will be borne by the project in accordance with Kenyan law through RAP.
15.	Materials be sourced from the community and proper rehabilitation of the borrow sites	The project will prioritize sourcing of materials such as sand, ballast, and gravel from the community where quality, quantity, and timely supply can be met. Specific arrangements will be discussed with local suppliers during implementation. Material Sites rehabilitation and restoration measures will be incorporated in the ESMP.
16.	Community members raised concerns regarding the need to improve nearby hospital and health facility services, noting that improved road access alone may not address existing gaps in healthcare infrastructure as well as serving the expected population influx during construction.	While acknowledging the importance of health service delivery, it was clarified that the road project does not include direct interventions in the health sector infrastructure. However, the project is expected to generate indirect positive impacts by improving physical access to health facilities, reducing transport time for patients, and enhancing emergency referral systems. The issue was documented and will be communicated to relevant County Government health authorities and KeNHA for consideration in their respective investment planning frameworks.
17.	Requested access culverts for access to households, proper drainage systems.	- Access culverts will be provided where necessary to maintain connectivity to homes, farms, and institutions. However, not every home may receive a dedicated culvert. Design decisions will be based on engineering standards, safety, and hydrological requirements. - Proper drainage systems will be designed as per the Hydrological studies are being conducted to ensure adequate drainage structures, including side drains, culverts, and bridges, are incorporated into the design to prevent flooding and erosion. - Box culverts will be considered where hydrological and topographical conditions require them, particularly in areas with high water flow or where access for livestock and vehicles is needed.

F. Proposed Engagement Strategy Across Project Phases

Project Phase	Engagement Objectives	Key Stakeholders	Engagement Methods	Frequency / Timing	Expected Outcomes
1. Project Planning & ESIA	- Disclose project information - Identify key environmental & social risks - Capture stakeholder views and concerns	Local communities, PAPs, vulnerable groups, County & National Government, local administration, CBOs	Public barazas, FGDs (men, women, youth), KIIs, stakeholder meetings, socio-economic surveys	At key ESIA milestones (scoping, draft ESIA disclosure)	- Informed stakeholders - Identified risks and concerns - Inputs into ESIA, ESMP, and RAP
2. Design & pre-construction	- Validate project design and alignment - Disclose RAP and compensation framework - Establish GRM and LGRCs	PAPs, land owners/users, elders, County land offices, contractors, local leaders	Disclosure meetings, PAP verification exercises, RAP consultations, GRM sensitization forums	Prior to compensation and site handover	- Verified PAPs and assets - Community understanding of entitlements - Functional GRM structures
3. Construction Phase	- Manage impacts and community concerns Promote health, safety, and labor standards - Maintain continuous communication	Host communities, contractors, workers, youth, women groups, LGRCs, local administration	Regular community meetings, toolbox talks, FGDs, grievance handling sessions, information boards, community liaison officer (CLO) engagement	Continuous (monthly meetings, ongoing GRM access)	- Reduced conflicts and grievances - Improved community safety awareness - Effective issue resolution
4. Operation & Maintenance	- Monitor long-term impacts Ensure road safety and environmental sustainability - Maintain stakeholder relationships	Road users, local communities, County Government, transport operators, schools	Stakeholder meetings, road safety campaigns, feedback forums, periodic surveys	Periodic (quarterly/biannual)	- Sustained stakeholder trust - Improved road safety Ongoing issue identification and management
5. Decommissioning	- Manage closure impacts - Restore sites and livelihoods where needed	Local communities, County Government, affected land users	Community meetings, consultations on site restoration, grievance resolution	As required at end of project life	- Agreed restoration measures - Minimal residual impacts - Closure-related grievances addressed

G. Grievance Mechanism Summary

The objective of the grievance handling systems and procedure is to establish for the community mechanism for raising complaints related to compensation for loss of structures and other livelihood properties and assets and having such complaints resolved as amicably as possible through acceptable and binding corrective actions. This grievance management system will be in place throughout the Project construction period, including the exit period.

The Plan proposes a four-level Grievance Redress committee for the project-affected persons and the communities living along the project road. The system consists of the Locational Level Grievance Redress committee, the Sub-County GRC, the County Level GRC which will also serve as the Project Implementation Unit Committee and lastly the Court of Law or through the commission of administration of Justice at relevant level or which depends on which court the complaints are filed. The supervision consultant and contractor engaged to manage the environmental and social risks under the project will be required to sit on the committees. The project will also establish a workers' grievance redress mechanism to address labour issues within the labour management plan.

H. Budget and Implementation Arrangements

Implementation of the SEP will be led by KeNHA, working in collaboration with the Supervision Consultant, Contractor(s), county and national government agencies, and other relevant stakeholders. KeNHA will be responsible for coordinating stakeholder engagement activities, ensuring timely information disclosure, managing the Grievance Redress Mechanism (GRM), monitoring SEP implementation, and reporting on stakeholder engagement performance throughout the project lifecycle.

The summary of the estimated budget for implementing the SEP throughout the project lifecycle is presented in table below

Budget category	Unit	Targeted Areas/ Estimated Quantity	Frequency	Unit cost (KES)	Estimated total (KES)
County Engagement Forums	Forum	1	3	300,000.00	900,000.00
Sub-County Engagement forums	Forum	3	12	100,000.00	3,600,000.00
Community meetings and barazas	Meeting (18 Locations)	18	12	50,000.00	10,800,000.00
Focus group discussions	Session(18 locations)	18	4	20,000.00	1,440,000.00
Vulnerable Group Engagement	Session (18 locations)	18	14	30,000.00	7,560,000.00
Translation and interpretation	Assignment	5	1	100,000.00	500,000.00
Accessibility services	Assignment	1	1	5,000,000.00	5,000,000.00
Radio and media communication	Broadcast	1	6	100,000.00	600,000.00
Printing and disclosure materials	Lot	1	1	300,000.00	300,000.00
SMS and telephone communication	Lot	1	36	100,000.00	3,600,000.00
Grievance mechanism operations	Month	18	36	50,000.00	32,400,000.00
GRC training	Training	1	3	3,000,000.00	9,000,000.00
Monitoring and field verification	Forum	1	12	200,000.00	2,400,000.00
Stakeholder satisfaction survey	Survey (Yearly)	1	3	100,000.00	300,000.00
Independent review	Assignment	1	3	1,500,000.00	4,500,000.00
Sub-Total					82,900,000.00
Contingency					8,290,000.00
Total Cost					91,190,000.00

I. Key Recommendations on Stakeholder Engagement and Consultation

The issues raised during stakeholder consultations across the various platforms highlight the need for a structured, inclusive, and continuous engagement process. Implementing the below tabulated recommendations will enhance project acceptance, reduce project related risks, and ensure alignment with AfDB safeguard requirements.

S/No	Key Issue Identified	Description (From Consultations)	Recommended Action
1.	Land acquisition and boundary disputes	Communities expressed concerns over unclear land ownership, boundary demarcation, and fairness of compensation	- Conduct participatory mapping and joint verification with PAPs, elders, and land officials - Enhance transparency in valuation and compensation processes
2.	Livelihood disruption (farming & irrigation)	- Potential loss of farmland, - Irrigation furrows, and - Reduced agricultural productivity	- Engage farmers and WRUAs in designing mitigation (such as culverts, access crossings) - Implement livelihood restoration programs aligned to local practices

S/No	Key Issue Identified	Description (From Consultations)	Recommended Action
3.	High expectations for employment opportunities, tenders and CSR activities	Youth and local communities expect priority in jobs, tenders and CSR activities	- Clearly communicate recruitment criteria and timelines - Enforce Labour Management Plan - Ensure transparent and fair hiring processes - Manage expectations early - Priorities CSR activities per need
4.	Road safety concerns	Fear of increased accidents involving children, pedestrians, and livestock	- Conduct road safety sensitization; involve communities in identifying hotspots - Install signage, speed bumps, and crossings near schools and settlements
5.	Gender-based risks (GBV/SEA)	Concerns over increased GBV risks due to labor influx	- Implement GBV Action Plan - Conduct awareness campaigns - Establish confidential reporting mechanisms and enforce worker Codes of Conduct
6.	Limited participation of women and vulnerable groups	Women, elderly, and PWDs reported low participation in decision-making forums	- Conduct targeted FGDs - Ensure representation in LGRCs - Adapt meeting times, venues, and communication approaches
7.	Impacts on water sources and natural resources	Communities raised concerns about impacts on rivers, springs, and grazing areas	- Engage WRUAs and communities in identifying sensitive resources - Implement protection and restoration measure - Involve communities in monitoring
8.	Weak feedback mechanisms	Communities indicated limited feedback after initial consultations	Establish regular communication updates use barazas, notice boards, and CLO engagement to provide feedback on decisions and progress
9.	Grievance management challenges	Preference for local dispute resolution; need for accessible grievance channels	- Strengthen and train LGRCs; - Ensure GRM is accessible, transparent, and timely; - Provide multiple reporting channels
10.	Over-reliance on local opinion leaders in engagement	Risk of exclusion where engagement is dominated by leaders	Complement leadership engagement with broad-based consultations (FGDs, household survey) and ensure inclusive participation
11.	Cultural and social sensitivities like beehives, medicinal trees	Presence of culturally significant sites and strong traditional structures	- Engage elders in identifying cultural sites - Apply chance finds procedures - Respect local customs in engagement processes (apply FPIC)

1 CHAPTER ONE: INTRODUCTION AND PROJECT DESCRIPTION

1.1 Introduction

The Kenya National Highways Authority is undertaking preparation for the Great Rift Economic Development Corridor which encompasses the Biretwo - Arror - Chesongoch (B126) Road and Associated Spur Roads. The road sections form a critical link between the busy Eldoret – Malaba (A8) highway and the Kenya-Sudan Link Road; both of which promote and facilitate a regional economic integration with Kenya and her neighbours Uganda and South Sudan.

The proposed Biretwo–Arro–Chesongoch (B126) Road and Associated Spur Roads Project forms part of the Great Rift Economic Development Corridor and comprises the improvement and upgrading of a primary corridor road together with its associated spur roads within Uasin Gishu and Elgeyo Marakwet Counties, located in the North Rift Region of Kenya’s classified road network.

Phase 1 of the project includes the improvement of three road sections, namely the Biretwo–Arro–Chesongoch Road (B126) and two associated spur roads, Nyaru–Kapkayo Road (B124) and Kimwarer–Emsea Road (B122). The Biretwo–Arro–Chesongoch (B126) Road starts at Biretwo, located along the Iten–Kabarnet Road, at approximately 0°32'13"N, 35°33'26"E, and proceeds in a generally north-easterly direction through Arro before terminating at Chesongoch, located at approximately 1°07'06"N, 35°38'35"E, within Elgeyo Marakwet County.

The Nyaru–Kapkayo Road (B124) commences at Nyaru, which is located along the Eldoret–Eldama Ravine Road, at approximately 0°19'32"N, 35°34'29"E, and extends eastwards to Kapkayo, located at approximately 0°18'50"N, 35°42'28"E. The Kimwarer–Emsea Road (B122) starts at Kimwarer, located at approximately 0°18'48"N, 35°37'58"E, and terminates at Emsea, which is located along the Iten–Kabarnet Road, at approximately 0°27'09"N, 35°37'48"E. These spur roads provide critical connectivity between the main B126 corridor, the Kerio Valley region, and surrounding rural settlements. See Figure 1 illustrating the proposed project layout and areas.

1.2 Project Description

Project Development Objectives: The Biretwo-Arror-Chesongoch Road(B126) and its associated spur roads aims to address critical transportation challenges and stimulate socio-economic development in Elgeyo -Marakwet County. The current unpaved road faces structural accessibility issues, hindering economic activities and posing challenges to security and tourism. The other objectives include:

- e) Enhance Agricultural Connectivity: Facilitate the transport of agricultural produce to markets.
- f) Improve Security Infrastructure: Upgrading of the proposed road will support security forces in addressing regional insecurity issues.
- g) Boost Regional Economic Growth: Reduce travel time and vehicle maintenance costs, foster economic activities and trade within the county and neighbouring counties.
- h) Promote Tourism: Enhance accessibility to the Rimoi National Reserve, contributing to tourism development and generating revenue for the National and County Government.

Project Beneficiaries: The proposed project expand basic access transport services to the population of the Economic Development Corridor is expected to attract investment, create jobs, and enhance regional connectivity. The main beneficiaries include the vulnerable and marginalized communities in Kerio Valley with an estimated population of over 2 million residents; the traveling public who will benefit from reduced travel times and transport costs; and the businesses and traders engaged in commercial activities, which are likely to grow with the improved road corridor. Women, vulnerable groups and children in the project area will particularly benefit from improved transport services through improved movement, delivery of food during scarcity periods, and facilitate government response in the event of any security incidents. In addition, capacity building activities will deepen the on-going policy and institutional reforms in the transport sector and contribute to human capital development.

Project Components: The proposed phase 1 project will comprise the following components:

Table 1- 1: Phase 1 Proposed Road Project Route

S/No.	Road Section	Road Classification	Length (Km)	County
1	Biretwo – Arrior – Chesongoch	B126	72.0	Elgeyo Marakwet
2	Nyaru – Kapkayo	B124	32.0	Elgeyo Marakwet
3	Kimwarer – Emsea	B122	19.4	Elgeyo Marakwet

1.3 Project Rationale

The rationale for the proposed road improvement project is grounded in the need to address persistent transportation, connectivity, and socio-economic development challenges within Elgeyo Marakwet County and the wider North Rift region of Kenya.

The existing road network, with a combined length of approximately 123.4 km, is predominantly gravel surfaced and characterized by poor riding quality, inadequate structural capacity, steep escarpments, and sharp horizontal and vertical curves, particularly along the Nyaru–Kapkayo section. These conditions are exacerbated during the rainy seasons due to insufficient drainage infrastructure, leading to erosion, localized flooding, slope instability, and frequent disruption of traffic flow. Consequently, road users experience increased travel time, high vehicle operating costs, and reduced reliability of access to markets and essential services.

The Biretwo–Arrior–Chesongoch Road serves as a critical north–south transport corridor linking the Nairobi–Nakuru–Eldoret (A8) highway to the Kerio Valley and onward connections toward West Pokot, Baringo, and Turkana Counties via the Tot–Marich Pass axis. Similarly, the Nyaru–Kapkayo and Kimwarer–Emsea roads provide essential east–west connectivity between the Elgeyo Escarpment, highland agricultural zones, valley settlements, and mineral-rich areas, including the fluorspar belt. Collectively, these roads play a vital role in supporting inter-county mobility, regional trade, and access to social and economic infrastructure.

Upgrading the roads to improved all-weather standards, including enhanced pavement structure, improved geometry, and adequate drainage systems, is expected to significantly improve transport efficiency, road

safety, and climate resilience. The project will facilitate the movement of agricultural produce, livestock, and construction materials, thereby strengthen local livelihoods and enhance market access for farming communities. This is particularly important in view of ongoing and planned water and agricultural development initiatives within the Kerio Valley region, which are expected to increase agricultural productivity.

The improved road network will also enhance security operations and emergency response, given the strategic importance of the corridor in areas that have historically experienced insecurity due to difficult terrain and limited accessibility. Improved accessibility will support the presence and mobility of government services, including security agencies, health services, and disaster response units.

In addition, the project is expected to contribute to the growth of tourism, particularly along the Biretwo–Arror–Chesongoch section, which provides access to natural and cultural attractions such as the Rimoi National Reserve and scenic escarpment landscapes. Improved road infrastructure is anticipated to increase tourist accessibility, stimulate local enterprise development, and generate additional revenue for both National and County Governments.

Overall, the proposed road improvements align with the Government of Kenya’s development priorities, including the Bottom-Up Economic Transformation Agenda (BETA), by promoting inclusive growth, improving rural accessibility, reducing poverty, and fostering sustainable socio-economic development within the project area of influence.

1.4 Project Location

Elgeyo Marakwet County is located in Kenya’s Rift Valley region. It borders West Pokot to the north, Baringo to the east, Uasin Gishu to the west, and Trans Nzoia to the northwest. The county is divided into five sub-counties Keiyo North, Keiyo South, Kerio Valley, Marakwet East, and Marakwet West featuring striking ecological contrasts between the Kerio Valley, the highland escarpments, and the plateau. The county’s geography ranges from semi-arid lowlands to fertile highlands, influencing settlement, livelihoods, and economic activities.

The proposed Phase 1 project will be largely transverse Elgeyo Marakwet County which cover three sub-counties, which are: Keiyo North, Keiyo South and Kerio Valley. Each of these sub-counties is further divided into 9wards, with 16 locations and 35 sub locations.

Table 1- 2: Administrative Units within the Proposed Phase 1 Road Corridor

County	Sub-County	Ward	Division	Location	Sub Location	
Elgeyo Marakwet	Keiyo Valley	Endo	Chesongoch	Mokoro	Enou	
					Kisoka	
		Sambirir		Mon	Lukuket	
					Chesetan	
					Mogil	
		Arror	Tunyo	Arror	Resim	
					Chepkum	
					Chesuman	
					Arror	
					Koitolial	
	Keiyo North	Emsoo	Central	Keu	Chegilet	
					Kobulwo	
					Komoigon	
		Tambach		Kiptuilong	Rimoi	
					Songeto	
		Soy North		Kitany	Kabito	
			Chepsigot			
		Keiyo South	Soy North	Southern	Kibargoi	Cheptebo
						Rokocho
			Soy South		Kibargoi	Emsea
	Changach					
	Soy				Sego	
					Muskut	
				Morop		
				Chop		
	Chemoiben			Tumeiyo		
	Ketgoi					
	Kocholwo	Enego				
	Kamwosor	Kapkitony				
		Kamwosor				
		Kapchorwa				
		Metkei	Kipsaos			
		Kabiemit	Kabiemit			
		Marichor	Nyaru			
		KipKabus				
		Cheboien				
	Soy South	Soy	Turesia			
			Chop			
		Chemoiben/Kapkayo	Tumeiyo			
			Chepsirei			
	Koimur					

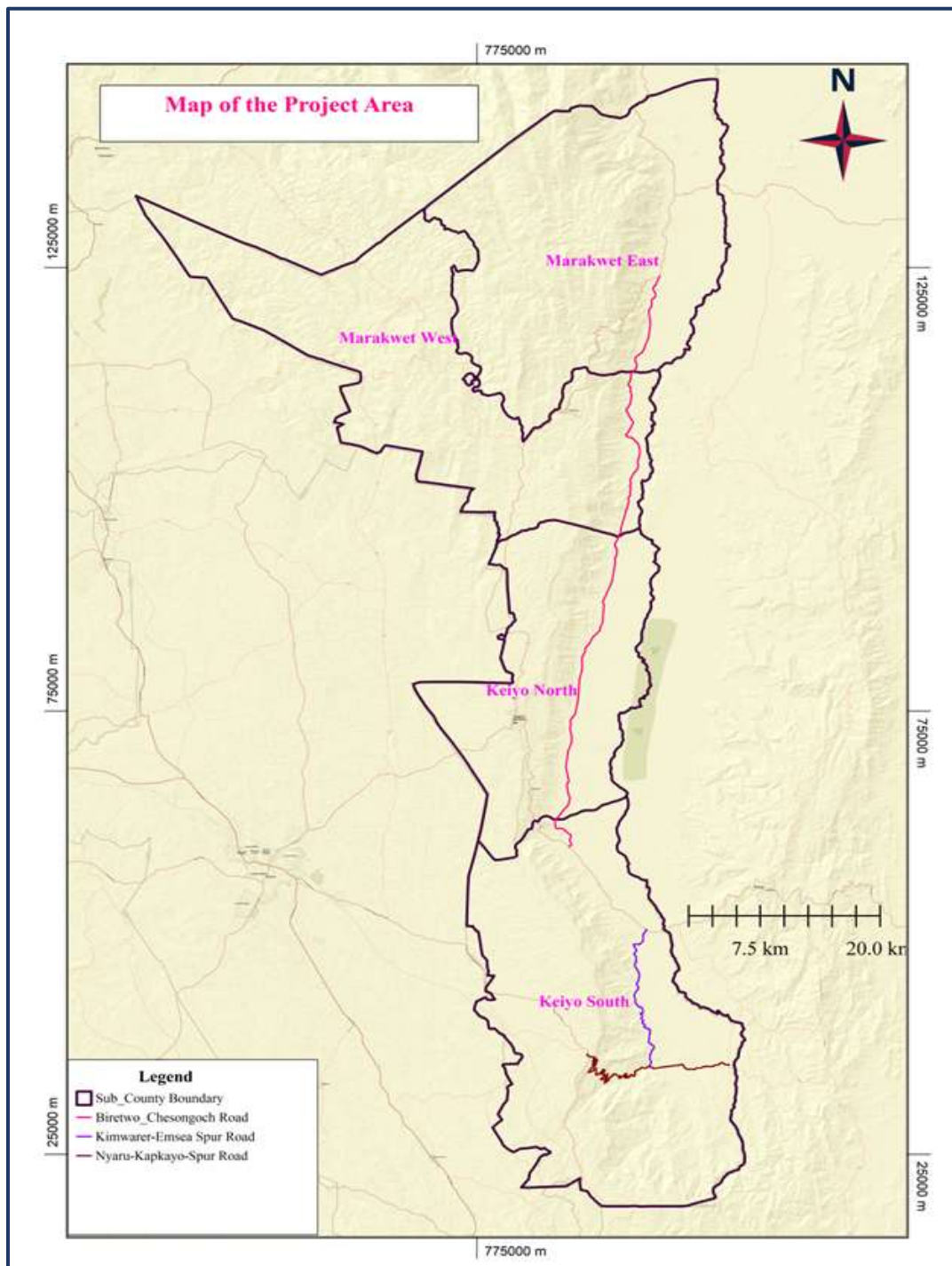


Figure 1- 1: Location of Project Roads

1.5 Status of Project Design Activities

i. Existing road condition

The Phase I project roads are predominantly earth and gravel rural access roads serving agricultural zones, trading centres, and dispersed rural settlements. Overall, the roads exhibit poor to fair condition, characterized by narrow carriageways, uneven riding surfaces, corrugations, potholes, loose gravel and eroded sections.

Drainage-related distress is common among all three corridors, with waterlogging, surface runoff damage, and localized wash-outs evident in low-lying and sloping sections. During the rainy season, some stretches become difficult to traverse, while in the dry season the roads generate excessive dust, affecting roadside communities and users. Geometric limitations, including sharp curves, steep gradients, and limited sight distances, reduce travel speeds and compromise safety. Collectively, these conditions increase vehicle operating costs, restrict reliable access, and constrain socio-economic activities within the project influence area.

ii. Existing Drainage Structures

Drainage structures along the three Phase I roads is limited, scattered, and in many sections inadequate. The existing system consists mainly of small culverts, drifts, natural stream crossings, and informal side drains, many of which are undersized, silted, damaged, or poorly aligned.

As a result, several sections experience overtopping, erosion of shoulders and embankments, formation of gullies, and sediment accumulation, particularly near river crossings, seasonal streams, and low-lying terrain. These deficiencies significantly contribute to the rapid deterioration of the road surface. The project therefore proposes the rehabilitation, replacement, and construction of new drainage structures, including cross-drainage works, lined side drains, and erosion protection measures.

iii. Existing Road Reserve

The roads generally lie within established but variable road reserves. In rural sections, the reserves are relatively open, bordered by farmlands, grazing areas and natural vegetation. However, within trading centres and settlement clusters including sections of Arrior, Emsea, Kimwarer and Kapkayo corridors, parts of the reserve have been encroached by permanent and semi-permanent structures, fences, kiosks, and social facilities.

This encroachment has resulted in constrained carriageway widths, limited shoulders, and increased safety risks to pedestrians and roadside activities. The proposed works will primarily utilize the existing reserves, with minor additional land take where required to accommodate realignments, drainage improvements, junction treatments, and road safety features.

iv. Proximity to the Rimoi Game Reserve

A key consideration for the Biretwo-Chesongoch road is its proximity to the Rimoi Game Reserve. The road alignment does not traverse the protected area itself; however, it passes approximately 3 kilometers from the main reserve entrance. This proximity creates a zone of influence where project-related activities could lead to indirect impacts on the reserve's ecosystems. Primary concerns include increased traffic

volume and speed, which could elevate the risk of wildlife-vehicle collisions for animals moving beyond the reserve boundaries, noise disturbance, and the potential for facilitated access leading to increased human-wildlife conflict or illegal activities. These potential indirect and cumulative impacts will be assessed in detail in ESIA.

v. Project Component

a) Road Geometry and Design Standards

The proposed project involves upgrading three existing road sections to bitumen standard, classified as Class B (National Highway). The road geometry has been developed in line with the Kenya Road Design Manual (RDM) Volume 1.3, with supplementary reference to AASHTO (2018) guidelines where appropriate.

The design will primarily utilize the existing road reserve, with minor realignments proposed at specific locations to correct sharp curves, bypass densely populated areas such as Aror- trading centre, and alleviate encroachment on adjacent settlements. The upgraded road will feature a 6.5–7.0 metre carriageway with 1.5–2.0 metre shoulders, and will consist of a new pavement structure including a prepared subgrade, gravel sub-base, crushed stone base, and an asphalt concrete wearing course.

In designing the road, particular emphasis has been placed on achieving a safe, functional, and economically viable alignment, while at the same time minimising land acquisition, resettlement, and environmental disturbance. Given the varied terrain along the corridor including rolling landscapes, steep escarpments, mountainous sections, and built-up market centres the design adopts a context-sensitive approach rather than a uniform standard throughout. Key geometric parameters for each road section are summarised in the table below.

Table 1- 3: Key Geometric Design Parameters by Road Section

Parameter	B126 (Biretwo–Aror–Chesongoch)	B122 (Kimwarer–Emsea)	B124 (Nyarū–Kapkayo)
Approximate Length	~72 km	~19 km	~32 km
Terrain	Predominantly rolling	Rolling and mountainous	Escarpment, mountainous and rolling
Design Speed	85 km/h (rural), 50 km/h (market centres)	60–70 km/h	50–85 km/h (terrain-dependent)
Carriageway Width	7.0 m	7.0 m	6.0 m (approved reduced standard)
Shoulder Width	1.5 m (paved)	1.5 m (paved)	1.0 m (paved)
Typical Cross-Section	Type R5 (RDM)	Type R5 (RDM)	Type R6 (Modified)
Design Vehicle	DV5 (15 m truck + trailer)	DV5 (15 m truck + trailer)	DV5 (16.9 m truck + trailer)

Several design decisions of environmental and social relevance have been incorporated:

- **Reduced cross-sections:** For the B126 and B122 sections, a carriageway width of 7.0 m with 1.5 m paved shoulders (R5 standard) has been adopted instead of wider Class B standards. This significantly reduces land take and potential displacement while maintaining acceptable safety and operational performance. For the B124 section, a reduced standard of 6.0 m carriageway with 1.0 m shoulders was approved in response to economic considerations and challenging terrain.

- **Arror Bypass:** A bypass is proposed to the east of Arror Market to avoid extensive displacement and disruption that would occur if full design standards were applied through the existing market centre. A loop connection will be provided to ensure continued access for local traffic, businesses, and residents.
- **Road reserve strategy:** The design recognises that the existing road reserve is generally narrower than the ideal 60 m corridor typically associated with Class B roads. As such, land acquisition will be based on the actual construction width required to safely achieve the design geometry, rather than applying a uniform reserve along the entire corridor.
- **Speed management in settlements:** Design speeds are reduced to 50 km/h within market centres and other built-up areas such as Biretwo, Arror, and Chesongoch. These sections will incorporate traffic calming measures to enhance pedestrian safety and reduce accident risk.

b) Road Safety and Ancillary Features

Road safety is a core consideration of the project design and reflects both national highway standards and local conditions along the corridor. The proposed road will incorporate a range of safety and ancillary features, including:

- **Safety hardware**, such as guardrails, hazard markers, and retro-reflective road studs at bridges, sharp curves, steep embankments, and other high-risk locations;
- **Traffic calming measures**, including rumble strips and speed humps at approaches to market centres, settlements, and identified livestock and wildlife crossing points;
- **Street lighting**, limited to market centres, major junctions, and designated truck parking areas;
- **Junction layouts**, primarily simple bell-mouth accesses or partly channelised T-junctions to safely manage turning movements;
- **Drainage systems**, comprising standard side drains (Types A2, B1, and B2) selected according to terrain and hydrological conditions; and
- **Public transport and freight facilities**, including provision for bus bays and designated truck parking areas where appropriate.

c) Link to Land Acquisition and Resettlement

The adopted geometric design is a key determinant of the project's land acquisition requirements. Design measures such as reduced cross-sections, context-specific speed management, and the Arror Bypass have been deliberately applied as impact avoidance and minimisation measures. The final land acquisition footprint is presented in the Resettlement Action Plan (RAP). Any changes on the geometric design including precise locations of borrow pits, material sites, contractors' camp sites or additional land acquisition not captured in the current design will require a review and update of the Stakeholder Engagement Plan. Any significant changes occur during detailed design, this SEP will be updated and re-disclosed in accordance with AfDB ISS OS10 Guidance Note paragraph 16.

1.6 Project Activity and Impact Register on General Stakeholders

The table below outlines how the various projects activities will impact the stakeholder and the proposed mitigation measures to be applied during implementation.

Table 1- 4: Project Activities Impact on General Stakeholders

Project Activity	Stakeholder Group	Potential Impact	Nature of Impact (Positive/Negative)	Proposed Mitigation Measures	Responsibility	Monitoring Indicator
Pre -Construction Phase						
Road alignment and other design features	- Project Affected Persons (PAPs), - Landowners	- Involuntary land acquisition - Physical or economic Displacement - Loss of assets/structures/crops	Negative	- Conduct socio-economic surveys/Census - Implement Resettlement Action Plan (RAP); - Ensure fair and timely compensation; - Implement livelihood restoration	- KeNHA - NLC - Consultant - County Government	% PAPs compensated; %grievances resolved
Stakeholder consultations	- Local communities (men, women, youth, VMGs) - All stakeholders	Exclusion of vulnerable groups from decision-making	Positive	- Ensure inclusive consultations; - Targeted FGDs for women, youth, VMGs; - Use local language	- Consultant - KeNHA - County Government	- No. of meetings held; - Sex disaggregated data of participants - Minutes of the meetings - Signed attendance forms and Photos
Establishment of Grievance Redress Mechanism (GRM)	All stakeholders	Lack of accessible complaint channels	Negative	- Form grievance committees for Community (LGRCs) - Train members;	- Local Administration - Consultant - KeNHA	- Functional GRM; %cases resolved within timeframe

				• Disclose GRM procedures widely		• No. of GRM Meetings
Site surveys and investigations	• Farmers, • Pastoralists • PAPs	• Temporary disruption to land use	• Negative	• Provide prior notice; • Compensate for any damages; • Restrict unnecessary access	• Consultant • KeNHA	• Complaints recorded and addressed
Land acquisition and compensation	• PAPs • Pastoralist • Farmers	• Temporary disruption of land use • Permanent displacement • Impacts on livelihoods	• Negative	• Initiate the relocation process • Undertake valuation and compensation • Compensate affected persons/groups • Provide prior notice to vacate after issuance of compensation • Provide LRP measures	• Consultant • KeNHA • NLC	• Gazette notices • Compensation acknowledgment forms • Award letters • Compensation documents
Recruitment planning	• Local communities (youth, skilled/unskilled labor)	• Unrealistic employment expectations	• Negative/Positive	• Communicate transparent recruitment criteria • Prioritize local labor where feasible (capped at 70%)	• Contractor • Consultant • KeNHA	• % local labor employed • Share workforce data • Align with GOK labour regulations
Construction Phase						
Site clearing and earthworks	• Farmers, • Landowners • PAPs	• Loss of crops, vegetation, soil erosion • Involuntary land acquisition	• Negative	• Compensate for loss of crops, assets, structures • Implement RAP	• Contractor • Consultant • NLC • KeNHA	• Area rehabilitated; erosion incidents

		- Physical or economic Displacement - Loss of assets/structures/crops		- Implement erosion control measures - minimize clearing footprint		Confirmation of affected PAPs/assets
Road construction works	Local communities	Dust, noise, vibration	Negative	- Water sprinkling - Restrict working hours - Maintain equipment	- Contractor - Consultant	Dust levels complaints logged
Traffic diversion and haulage	Road users, traders, schools	Increased accidents, restricted access	Negative	- Install road signages - Develop Traffic management plans - Install Safe crossings points (schools/markets) - Implement Road Safety Awareness programme.	- Contractor - Traffic Police	- No. of incidents - No. of signage installed - No. of Road Safety Awareness trainings
Labor influx	Local communities (especially women, youth)	- Risk of GBV, - Increased social conflict risk - Increased pressure on community services - Risk of Labour related grievances	Negative/Positive	- Implement GBV Action Plan; - Worker code of conduct - Community awareness programs - Implement Labour Influx Management Plan. - Institutionalize Worker's Grievance Redress Committee	- Contractor - Consultant - KeNHA	%GBV cases reported % of trainings conducted % local workforce in gender % of code of conduct signed

Employment opportunities	Youth, local skilled/unskilled workers/women	- Job creation - Income generation	Positive	Prioritize local hiring; ensure fair wages and safe working conditions	- Contractor - Consultant	% local workforce % local workforce in gender % of code of conduct signed - Align pay with GOK labour regulations
Material sourcing (quarries, borrow pits)	- Local landowners - County Government Department of environment - NEMA - Mines and Geology Department	- Land degradation - Safety risks	Negative	- Obtain permits - Obtain signed agreements with landowners - Rehabilitate sites; - Fence hazardous areas	- Contractor - Consultant - NEMA - KeNHA	- No. of Sites restored - Compliance reports - No. of signed agreements with landowners
Camp establishment	Nearby communities	- Waste generation, - Water use conflict - Potential Social Risks	Negative	- Provide adequate sanitation - Waste management plan - Avoid local resource depletion - Develop Contractors camp management plan - Implement Social Management Plans	Contractor	- Waste disposal records - Records persons at the camp

Increased business opportunities	- Traders - New SMEs - Food vendors	Increased demand for goods/services	Positive	Support local procurement; engage local suppliers	- Contractor - Consultant	No. of local contracts awarded
Occupational health and safety	Workers	Injuries and accidents	Negative	- Provide PPE Policy and Use - Enforce safety procedures - Regular training	- Contractor - Consultant - KeNHA - DOSH	- Accident frequency rate % incidents/accidents
Cultural heritage disturbance	- Local communities - Kenya Wildlife Service - Department of Tourism and Cultural Heritage - Kenya Forest Service (KFS)	- Damage to sacred/cultural sites - Encroached to Rimoi National Reserve - Damage to Forest reserves	Negative	- Chance finds procedure - consult elders; avoid sensitive sites - Consult government agencies	- Contractor - National Museums - Kenya Wildlife Service (KWS) - Kenya Forest Service (KFS) - National Museums of Kenya	- No. of Incidents reported - Records of consultation held
Training on livelihood restoration measures	- Vulnerable and Marginalized Groups - Targeted community groups - Traders - PAPs	- Skills transfer - Value Addition trainings - Financial literacy	Positive	- Financial literacy before compensation for PAPs - Targeted group training on businesses - Support with agricultural inputs for farmers	- Consultant - KeNHA - County Government of Elgeyo Marakwet	- No. of trainings - No. of Vulnerable groups reached - No. of PAPs - No. of Farmers

1.6.1 Site Specific Project Activity and Impact Register

The following table identifies, for each segment of the proposed road corridor, the specific locations, anticipated impacts, and stakeholders affected. This register is based on the draft design information available as of April 2026. The register will be updated as detailed design progresses and will serve as the foundation for all site-specific engagement activities.

Table 1- 5: Sites Specific Project Activity Impact and affected stakeholders

Corridor Segment	Chainage/Km	Specific Location (Sub-Location/Village)	Type of Activity	Anticipated Impact	Affected Households	Key Vulnerable Groups Present	Timing of Impact
B126: Biretwo–Arror–Chesongoch							
Section 1	Km 0 – Km 15	Resim (Arror, Chepkum, Chesuman villages)	Road widening from gravel to bitumen (7m + 1.5m shoulders)	Land acquisition for road reserve expansion (20m total width)	176 Project affected Persons impacted through either through loss of livelihood, land or structure.	Women-headed elderly, PWDs, minority clan	Land: Month 3-6; Construction: Month 7-18
Section 1	Km 0 – Km 15	Resim – Arror River crossing	Bridge construction (replacement of drift)	Water access disruption; erosion; vibration		Pastoralists; women (water collection)	Construction: Month 10-14
Section 2	Km 15 – Km 45	Tunyo (Arror trading centre)	Road widening; drainage; realignment	Business disruption (35 stalls); dust; noise; potential relocation		Women traders; low-income; illiterate	Construction: Month 8-20
Section 2	Km 15 – Km 45	Sambirir (Chesetan, Mogil villages)	Cut sections through escarpment	Slope instability; landslide risk; increased land take		Elderly; households with young children; pastoralists	Construction: Month 12-24
Section 2	Km 45 – Km 72	Endo (Mokoro, Enou, Kisoka, Lukuket villages)	Road widening; drainage; realignment	Land acquisition; grazing route disruption; water access		Pastoralist (majority); minority clans; women	Land: Pre-construction; Construction: Month 18-30
B124: Nyaru–Kapkayo							
Section 3	Km 0 – Km 16	Soy South (Nyaru, Turesia villages)	Road upgrade; steep gradients	Land acquisition;	20 Project affected	Women-headed); elderly; schoolchildren	Construction: Month 6-18

Corridor Segment	Chainage/Km	Specific Location (Sub-Location/Village)	Type of Activity	Anticipated Impact	Affected Households	Key Vulnerable Groups Present	Timing of Impact
				slope stability; safety	Persons impacted through either through loss of livelihood, land or structure.		
Section 3	Km 16 – Km 32	Chemoiben/Kapkayo (Tumeiyo, Chepsirei, Koimur villages)	Road widening; drainage; realignment	Land acquisition; water point relocation		Women (water collection); PWDs; elderly	Construction: Month 12-24
B122: Kimwarer–Emsea							
Section 4	Km 0 – Km 10	Soy North (Emsea, Changach villages)	Road upgrading through mineral belt	Land acquisition; dust impacts	25 Project affected persons impacted through loss of livelihood, land or structure.	Farmers; households adjacent to heavy truck route	Construction: Month 6-14
Section 4	Km 10 – Km 19.4	Soy South (Morop, Chop villages)	Road widening; drainage; junction upgrade	Land acquisition; business impacts at Emsea		Women traders; low-income	Construction: Month 8-16

Total Project Affected Persons households 219

1.7 OBJECTIVE/DESCRIPTION OF SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. This SEP outlines the ways in which the Kenya National Highways Authority (KeNHA) will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about the proposed road project and any activities related to its implementation. The SEP specifically emphasizes methods to engage groups considered most vulnerable and that are at risk of being left out of project benefits.

Specific Objectives for stakeholder engagement process are as follows;

- a) Information Disclosure and Transparency; To provide timely, accurate, and accessible information about the project, its potential environmental and social impacts, and proposed mitigation measures.
- b) Facilitate Meaningful Consultation and Participation; To create opportunities for stakeholders to express their views, concerns, and preferences, and to ensure these inputs are incorporated into project design and implementation.
- c) Identify and Manage Environmental and Social Risks; To gather local knowledge and stakeholder perspectives to better identify risks and develop context-appropriate mitigation measures.
- d) Enhance Project Design and Decision-Making; To integrate stakeholder feedback into key project decisions, including alignment options, mitigation strategies, and community development initiatives.
- e) Promote Inclusion of Vulnerable and Marginalized Groups; To ensure that women, youth, elderly persons, persons with disabilities, and marginalized groups are effectively engaged and their needs addressed.
- f) Prevent and Manage Conflict; To proactively identify potential sources of conflict and address grievances early through dialogue and structured mechanisms.
- g) Establish and Operationalize Grievance Redress Mechanisms (GRM); To provide accessible, transparent, and culturally appropriate channels for stakeholders to raise concerns and receive timely resolution.
- h) Build Trust and Social License to Operate; To foster mutual understanding, credibility, and long-term relationships between the project and affected communities.
- i) Ensure Compliance with Legal and Safeguard Requirements; To meet national regulatory requirements and align with AfDB's Borrower Guidance Note for E&S Operational Safeguard 10 - Stakeholders Engagement and Information Disclosure, particularly on consultation, disclosure, and participation.
- j) Support Monitoring and Adaptive Management; To enable continuous feedback from stakeholders during construction and operation, informing adaptive management of environmental and social risks.

The Stakeholder Engagement Plan will be a live document throughout the project cycle. Any change on the geometric design including precise locations of borrow pits, material sites, contractors' camp sites or additional land acquisition not captured in the current design will require a review and update of the Stakeholder Engagement Plan. Any significant changes occur during detailed design, this SEP will be updated and re-disclosed in accordance with AfDB ISS OS10 Guidance Note paragraph 16.

2 CHAPTER TWO: STAKEHOLDER METHODOLOGY, IDENTIFICATION AND ANALYSIS

2.1 Principles of Effective Stakeholder Engagement Process

The stakeholder engagement process for the Biretwo -Arror-Chesongoch (B126) and associated spur roads will ensure meaningful consultation is undertaken in a timely, inclusive, transparent, and culturally appropriate manner throughout project life cycle and to ensure the stakeholders have the opportunity to understand the project, express their views, and influence project designs. Meaningful consultation will be guided by the following principles:

- **Proactive and Early Engagement:** Engagement efforts will start at the very beginning of project planning to identify and address potential concerns and impacts before critical decisions are finalised.
- **Inclusiveness and sensitivity:** All stakeholders, including project-affected persons, vulnerable and marginalized groups, and other interested parties, will be identified and meaningfully engaged.
- **Transparency:** Relevant project information, including objectives, risks, impacts, and mitigation measures, will be disclosed in a timely and understandable manner.
- **Inclusive and Cultural Appropriateness:** Engagement approaches will respect local traditions, languages, and social norms.
- **Accessibility:** Information and engagement activities will be conducted in ways that are accessible to all stakeholders, including those with low literacy or disabilities.
- **Responsiveness:** Stakeholder feedback will be actively considered, and timely responses will be provided to address concerns and suggestions.
- **Accountability:** All engagement activities and decisions will be documented and reported to ensure transparency and compliance with AfDB ISS OS10 Guidance Note - Stakeholder Engagement and Information Disclosure.
- **Ongoing and Adaptive Approach:** Engagement strategies will be flexible and adjusted as necessary to respond to emerging risks, stakeholder feedback, or project changes, including public health or security considerations.
- **Gender-responsive engagement:** Consultation approaches will ensure that women, youth, persons with disabilities, elderly persons, and other potentially disadvantaged groups can participate meaningfully.

2.2 Affected parties

Affected parties include local communities, community members and other parties that may be subject to direct impacts from the project activities. Specifically, the following individuals and groups fall within this category.

Project-Affected Persons (PAPs): Individuals or households whose land, assets, livelihoods, or access to resources may be affected by land acquisition, resettlement, or construction activities. These will include largely Kerio valley communities, pastoralists, small scale traders along the corridor and other vulnerable households.

2.3 Other Interested Parties

This group of stakeholders also include parties other than the directly affected communities. They include organizations, institutions, or groups that have an interest in the project due to their mandates, expertise, or potential to influence project outcomes. This category includes:

a. **Government authorities and agencies:**

- National Government Ministries, Departments, and Agencies (Transport, Environment, Lands, Water, Internal security and Defense)
- Kenya National Highways Authority (KeNHA)
- Kenya Urban Roads Authority (KURA)
- Kenya Rural Roads Authority (KERRA)
- National Environment Management Authority (NEMA)
- National Land Commission (NLC)
- Kerio Valley Development Authority
- Kenya Wildlife Service (KWS)
- Water Resources Authority (WRA)
- Kenya Power Company (KLPC)
- Department of Occupational Health and Safety (DOSHS)
- National Transport and Safety Authority (NTSA)
- County Government of Elgeyo Marakwet (EMC)
- County departments (Transport, Environment, Lands, Trade, Health, Education, Water)

b. **National Government Administration Office (NGAO) and County Government**

- County Commissioners
- Deputy County Commissioners
- Assistant County Commissioners
- Chiefs and assistant chiefs
- Village elders and community leaders
- Ward administrators
- Sub-county administrators

c. **Civil society organizations and NGOs:**

- Local and international organizations working on development, environmental conservation, human rights, gender equity, or community empowerment in the project area. Such as World Vision, Kenya Red Cross, St. Teresa Mission Center, Kerio Valley Development Authority (KVDA) among others.
- Sub consultants contracted by KeNHA to manage social risks and community engagement (including GRM and GBV/SEAH, road safety, HIV/AIDs, Drug Abuse and Alcoholism etc.).

d. **Development partners and financial institutions:** Financing institutions, including the African Development Bank (AfDB), with oversight responsibilities for environmental and social safeguards and works.

e. **Private sector contractors and consultants:** Construction companies, engineering firms, environmental consultants, and other service providers involved in project implementation.

f. **Media:** Local, regional, and national media outlets that can facilitate information dissemination and public discourse about the project.

- g. **Academic and research institutions:** Universities and research organizations with interest in infrastructure development, environmental management, or social impact assessment.
- h. **Local institutions and structures, including clan elders, youth leaders/representatives, local women leaders/representatives, peace committees, and religious leaders,** who want to see successful implementation and be part of the project processes.

2.4 Verification of Community Representatives

In compliance with AfDB ISS OS10 Guidance Note paragraph 19, where stakeholder engagement depends on community representatives, the project will verify that such persons genuinely represent the views of their communities.

Table 2- 1: Verification of Community Representatives

Step	Activity	Timeline	Responsible
1	Map community structures (formal and informal) in each sub-location – identify all governance bodies, leadership roles, decision-making processes	Month 1	CSO + Social Safeguards Specialist
2	For each identified representative, document selection method, duration in role, accountability mechanisms to community	Month 1-2	CLOs + CSO
3	Conduct community validation meetings (separate sessions for men, women, youth, minority clans) asking: "Does [named representative] speak for you on project matters?"	Month 2	CSO (neutral facilitator)
4	Where representation is contested or incomplete, engage alternative representatives or hold separate consultations with unrepresented groups	Month 2-3	Social Safeguards Specialist
5	Document verification process and maintain register of verified representatives (see Annex 5)	Month 3	Social Safeguards Specialist

Special Provision for Minority Clans and Unrepresented Groups

Where verification identifies minority clans, IDPs, or other groups not represented in traditional leadership structures, the project will:

1. Hold separate confidential consultations with those groups
2. Engage trusted intermediaries from outside the area (e.g., CSOs with no local affiliation)
3. Not rely on majority-community representatives to speak for minority groups

2.5 Vulnerable Household Register – Confidential Protocol (NEW)

In compliance with AfDB ISS OS10 Guidance Note paragraphs 13-14, the project will maintain a confidential, site-specific register of vulnerable households. The register will continue to identify individual households by unique identifier and document specific vulnerabilities, barriers to participation, and required accommodations. The identification is through the stakeholder-mapping process, RAP census, socio-economic surveys, household consultations, focus group discussions, grievance records and engagement with relevant government departments and representative organizations.

A confidential register will be maintained for affected persons requiring additional support. It will record the nature of the barrier, assistance required, responsible officer, follow-up actions and implementation status. Access will be restricted to authorized personnel. Following the ongoing project preparation the table below provides the vulnerability household register collected.

Table 2- 2: Vulnerable Household Register

Sub-Location	Estimated Total Households	Estimated Vulnerable Households	Primary Vulnerability Types
Kapshakwei	1	1	Elderly-headed (1)
Kilos	2	2	Elderly-headed (2)
Kapcheblok	2	1	Elderly-headed (1)
Kasolia	1	1	Elderly-headed (1)
Kaitweng	3	1	Elderly-headed (1)
Biretwo	7	0	<i>Household contains PWD members (2 females) but head is not PWD.</i>
Songeto	1	0	<i>Household contains PWD members (1 male) but head is not PWD.</i>
All Other Sub-Locations	69	0	None identified
TOTAL	86	5	Elderly-headed (5)

2.6 Gender-Differentiated Issues and Priorities

Table 2- 3:Gender Differential issues

Identified	Men – Issues/Priorities	Women – Issues/Priorities	Youth – Issues/Priorities	Implications for Project Design
Land and Compensation	Customary land control (elders/clan leaders); priority on recognition of communal and individual land rights	- Limited land ownership; women access land through husbands/clan; widows risk exclusion; - Priority on inclusion in compensation	Generally landless; excluded from compensation despite reliance on family land and grazing systems	Recognize both customary and formal rights; ensure inclusion of women in compensation agreements; provide livelihood restoration for non-landowners and pastoral users
Livelihoods (Agro-pastoral & Pastoral Systems)	Loss of grazing land, livestock routes, and riverine farming areas; priority on maintaining mobility corridors	- Loss of kitchen gardens (riverbanks), firewood sources, and petty trade; - Priority on food security and water access	- Dependence on herding, charcoal burning, and casual work; - Priority on alternative livelihoods	Protect livestock corridors and water points; restore riverine farming; support women's micro-enterprises and climate-resilient livelihoods
Water Access and Burden	Concern over livestock watering points and seasonal rivers	- Increased burden of fetching water (longer distances if sources are disrupted); - Priority on accessible and safe water points	Assist in water collection; girls particularly affected (time burden, school absenteeism)	Avoid disruption of water sources; provide alternative water points near settlements; integrate water access into project design
Employment Opportunities	Preference for manual and security jobs; expectation of priority employment for local men	- Limited access due to low literacy, mobility constraints, and cultural norms; - Priority on inclusion in unskilled and support roles	- High expectations for employment; - Risk of exclusion due to limited skills	Introduce local hiring quotas; provide pre-construction skills training for youth and women; ensure fair recruitment processes
Gender-Based Violence (GBV) and Social Risks	Increased income may lead to alcohol use and intra-household conflict	- High risk of SEA/SH due to labor influx; early marriages and teenage pregnancies; - Priority on protection and awareness	Vulnerable to exploitation, cattle rustling influence, and delinquency	- Implement GBV Action Plan; enforce worker Code of Conduct; - Establish confidential reporting systems; - Partner with local leaders and administration and GBV service providers
Mobility, Safety and Road Use	Improved livestock and market access;	Safety concerns (speeding vehicles, harassment); difficulty	High exposure to road accidents (herders, school-going children)	Include livestock crossings, speed calming measures near settlements, pedestrian walkways,

Identified	Men – Issues/Priorities	Women – Issues/Priorities	Youth – Issues/Priorities	Implications for Project Design
	• Priority on maintaining livestock crossings	crossing roads with children and goods		and road safety awareness programs
Participation and Decision-Making	• Dominant role in barazas and community decisions	• Limited voice in mixed forums; • Preference for women-only FGDs; • Priority on meaningful participation	• Often excluded from formal meetings; youth voices underrepresented	• Conduct separate FGDs for women and youth; ensure representation in LGRCs and community committees
Access to Social Services	• Improved access to markets and administrative centers	• Improved access to health facilities (maternal health), but increased pressure on limited services; • Priority on nearby services	• Improved access to schools, but risk of dropout during construction (employment attraction, migration)	• Coordinate with county governments to strengthen health, education, and water services; monitor school attendance
Natural Resources (Firewood, Grazing, Sand Harvesting)	• Dependence on grazing lands and sand harvesting (riverbeds)	• Dependence on firewood, water, and natural vegetation; risk of increased scarcity	• Youth engaged in charcoal burning and sand harvesting for income	• Control resource extraction; provide alternative energy sources; regulate sand harvesting; introduce sustainable livelihood programs
Cultural Norms and Social Structure	• Strong influence of elders and customary systems	• Cultural norms restrict women's land rights and public participation	• Youth affected by generational tensions and changing social dynamics	• Engage elders and opinion leaders; design culturally sensitive interventions while promoting inclusion
Grievance Redress Mechanisms (GRM)	• More likely to access formal and informal grievance channels	• Barriers due to literacy, mobility, and social norms; • Preference for trusted local channels	• Limited awareness of grievance processes	• Establish accessible, community-based GRM with female representatives; allow anonymous and verbal reporting channels

3 CHAPTER THREE: STAKEHOLDER ENGAGEMENT PROGRAM

3.1 Summary of stakeholder engagement done during design preparation

During project preparation, public consultation meetings were conducted and key issues discussed. Consultations for the proposed road project were initially initiated in February 2024 during the needs assessment stages of the Biretwo-Arror Chesongoch Road by KeNHA and since then the consultations have taken a continuous approach throughout the project phases. During the preparation of the project the relevant mapping of stakeholders were undertaken in the month of August 2025, and followed by key stakeholder entry meetings in the month of December 2025 respectively. The community locational meeting started in the month of April 2026.

3.2 Key Stakeholders/Leaders Entry Level Meeting

ESIA/RAP team undertook entry level meeting with key stakeholders and leaders in all the No.5 sub-counties and No.7 consultation meetings(F=106,M=259,T=366 reached) were held with the main objective being to sensitize and create awareness among the leaders through whom the message of the project implementation was to reach the grassroots in preparation of the detailed ESIA/RAP study activities including cadastral surveys and pegging of the corridor, socioeconomic studies, gender assessment studies and valuation of affected properties. The response and support of the project was very overwhelming with the leaders committing to mobilize the communities towards cooperating in the ESIA/RAP Study and design exercise and project construction thereafter. The schedule of the sub-county meetings held were as follows;

Table 3-1: Schedule of Key Stakeholders and Leaders Meetings(gendered)

S/No	Sub-County	Meeting Venue	Male (M)	Female (F)	Intersex (I)	Total
1.	Kerio Valley	Aror Community Library	32	13	0	45
2.	Keiyo South	Biretwo-Child Fund Board Room	18	8	0	26
3.	Keiyo South	Muskut- Asst. Chief Office	54	12	0	66
4.	Keiyo South	Nyaru- Chief's Office	35	19	0	54
5.	Keiyo South	Kamwosor- Community Hall	25	6	1	32
6.	Kesses	Kesses-DCC Office Hall	20	15	0	35
7.	Ainabkoi	Ng'arua-RCEA Church Hall	75	33	0	108
Total			259	106	1	366

Table 3-2: Key emergent Issues and Concerns from the key stakeholder's entry level meetings

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
	Landownership and Documentation	All Corridor	Challenges in securing landownership documentation	✓Compensations will only be paid to bona fide landowners as proved through official ownership documentation ✓Compensation will only be done on legal landownership documents

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
			Government to consider assisting the PAPs in processing.	✓ Complete transactions on land (transfers on sales, inheritance processes, etc.)
			Delays in transfers of landownerships upon sales	✓ Landowners to finalize land transfers to the buyers ✓ Buyers assist, where possible, original landowners obtain title deeds
			High costs of succession processes	✓ Families have been encouraged to commence succession process where required ✓ Seek assistance from the County Administration in the succession process
			Family disputes on landownership	RAP process is not a conflict resolution forum families to sort out internal conflicts and disputes before actual compensation.
		Kesses	Clarification on how landowners under the scheme ownership will be compensated	PAPs to give opportunity for RAP assessments and await guidance from the Government during implementation of the project.
	Vulnerability Issues	All Corridor	- Assisting the vulnerable persons in the succession processes and obtaining landownership documents due to the related costs - Desire for a livelihood restoration program on the compensation process. - Inclusion of the Vulnerable and women in the project	✓ Community educations and livelihoods restoration programs will be integrated into the RAP/ESMP Implementation process. ✓ Stakeholder engagement is a continuous process through various functions and platforms. ✓ A gender assessment study will be undertaken with recommendations of how they will be supported and included.
	Benefits and opportunities	All Corridor	- Employment opportunities, especially for the youth - Criteria used to recruit construction workers. - Indirect employment opportunities foreseen in the project. - Use of local suppliers to the project with construction materials.	✓ This aspect was fully addressed and community informed to ensure they are eligible for employment, by having the right skills and national identification cards. ✓ Most casual labour will be sourced from the community and the third gender rule will apply. ✓ However, assured of employment at various levels through the project cycle ✓ Collaboration between the project management and the leadership

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
			Corporate Social Responsibilities (CSR)	✓ CSR is NOT an obligation but good practices ✓ Contractor(s) and KeNHA to consider CSR Policies and available resources through the project cycle ✓ Communities may prepare wish-lists to guide relevance of any possible CSR initiative. ✓ All requested CSR activities were recorded and reported for consideration by KeNHA during implementation.
			▪ Bus station and boda-boda sheds	✓ Bus Stations will be provided based on functionality, economic potential and operations efficiency among other design parameters ✓ Areas to install Boda Boda sheds will also be mapped and included during project implementation.
	Livelihood Restoration Measures	Major trading centres	▪ Roadside Markets and Markets ▪ Consideration for Livelihood Restoration Measures for roadside traders	✓ Requests for improvement of roadside markets and local market centres. ✓ Loss of business will be compensated and alternative livelihood restoration measures will be recommended where appropriate.
	Valuation and Compensation of affected land	All Corridor	Compensation factors – Land, plants, trees, building structures, amenities ▪ Title holders are deceased parents and succession not undertaken. ▪ What happens to the compensation? Partial severances – land and building structures	✓ Valuation process considers the land and all improvements on it ✓ Compensation based on market rates but also guided by comparable rates and replacement rates. ✓ No compensation will be paid out without landownership documents (title deeds). ✓ Affected families are advised to commence the Succession Process early to avert a crisis and disappointments. ✓ RAP valuation assessments take records as they are ✓ Land acquisition process to make decision on criteria for full or partial land-take and buildings ✓ The decision on economic viability of balance portions will be determined at the point of land acquisition by the NLC.

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
			Cultural replacement and compensation – Grave yards	✓ The cost of relocation is considered, mostly to cater for facilitation of cultural activities.
			- Public Institutions – schools, health facilities, etc. - Public land – road reserves, railway reserves, public forests and conservations areas	✓ Public institutions are handled on replacement basis ✓ Institutions will be engaged by KeNHA and NLC on utilization of public land and reserves for the project
			Wondering whether one can use their private Valuers for comparison	The official report will be from the KeNHA and NLC.
			What will happen to land where there are ongoing court cases?	✓ The RAP Implementation will not resolve land dispute matters – compensations will be held by the Government awaiting resolutions. ✓ Affected families should commence early measures to resolve their differences
			What is the mode of payment for lost property, cash, bank, Mpesa.	At the point of land acquisition, the options will be floated to the PAPs.
			Roles of lawyers and other agents in assisting PAPs	PAPs advised to be wary of conmen in form of agents and/or lawyers through the compensation process
			How delayed compensations will be handled	Appropriate measures will be in place to mitigate unprecedented delay through the RAP Implementation process
			Improvements after the valuation process has been undertaken	✓ Valuation constitutes the thresh-hold of development. ✓ Valuation results are valid for 24 months after which the process will be reviewed.
			What happens to the residual PAPs – homes’ ambiances, land use activities, access roads, livestock, schools, religious premises, etc.	✓ Specific reparation and corrective measures to residual PAPs to be formulated for consideration
	Public utilities	Water, power and communication lines	Water supply lines, power lines, sanitation facilities, communication lines, etc.	All public service lines and utilities are to be relocated in collaboration with respective services providers.

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
			Access roads crossings	✓ All major roads crossing the corridor will be preserved and provided with appropriate culverts or overpasses. ✓ Other may be re-routed to be combined into common crossings
	Survey Issues		▪ Extend of acquisition in terms of width.	✓ The survey maps will be prepared after the cadastral survey work that will also pick parcel boundaries, ✓ Factors and parameters that determines the final alignment will communicate in the detailed design stage.
	Topography management	Kimwarer-Nyaru route, Fluorspar – Kamwosor	Risks associated with cut-sections – safety, slope erosions and degradation Curves and bends	✓ The design team will ensure they integrated measures to prevent further environmental degradation. ✓ Sections with small elevations requiring cuts takes more land ✓ Slope protection initiatives to be instituted as stated in the ESMP ✓ Reforestation and soil retention activities have been recommended in the ESIA Report. ✓ The bends are designed to achieve design curvatures with minimal social and environmental implications.
	Biodiversity	All Corridor	Preservation and conservation of key bird species in Kesses Dam Sanctuary. Support in reforestation of trees along the corridor which will be cut	✓ Biodiversity studies are being undertaken to map these sensitive areas and proposed mitigation measures will be forming part of the ESMP. ✓ KeNHA have a programme for tree planting in place.
	Project Timelines	All Corridor	Commencement of the actual construction	✓ Stakeholders were informed that currently the project is at design stage. ✓ Continuous stakeholder engagement will undertake to keep them inform each project cycle.
	Health and Safety	All Corridor	Community expressed a concern about contractors leaving open excavation and unfinished works which possess a danger.	✓ Technical team will ensure appropriate road signages are installed. ✓ Alternative routes will be provided during construction and addressed

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
			Installation of safety devices such as bumps, signages, rubble strips, especially around schools and animal crossing section. Installation of road diversion	through the traffic management plan under the ESMP. ✓ The project ESIA will address mitigation measures for such and will be implemented through monitoring of the ESMP. ✓
	Grievances Gender Based Violence	All Corridor	How will the project handle grievances in the project, cases of GBV and sexual harassment from the contractor. Cases might increase during project implementation	✓ A Grievance Redress Mechanism Committee will be formed at locational level ensure issues are solved as efficiently as possible. ✓ This committee will be comprised of community members and local administration, further the RAP/ESIA report will develop as detailed GRM strategy. ✓ All workers will sign mandatory code of conduct
	Waste Management Storm Water	All Corridor	Community members wanted the contractor to ensure he does dump waste appropriately and doesn't channel storm water into their farms.	✓ The consultant informed the participants that it's the responsibility of the contractor to identify a location and build a waste management segregation point, where waste can be accumulated before it is collected by the County's waste handlers. ✓ The ESIA license for project also comes with such conditions imposed on the contractor.
	Material sites	All Corridor	✓ Restoration of borrow sites after use	✓ The community was informed the project committees should follow up with the contractor to ensure compliance as per the agreement with the landowners. ✓ The NEMA license issued to the contractor also has conditions of rehabilitation of material sites. ✓ Communities to ensure they have clear terms with the contractor on issues depth and width of borrowing
	Pollution	All Corridor	✓ Contractor to ensure dust on active construction sites is managed. ✓ Noise and vibration levels maintained	✓ ESMP has addressed mitigation measures to ensure the environmental negative impacts are mitigated. ✓ Air quality, noise and vibration measurement will be monitored periodically to ensure the community is safeguarded.

	Issue	Focal Areas	Concerns and Opinions	Responses and Clarification
	Project Acceptance	All Corridor	✓ Support and Need for the project	✓ Stakeholder confirmed and affirmed support for the project and requested to immediate implementation. ✓ All were in support of the project.

3.3 Key Informant Interviews

Table 3-3: Thematic Analysis of Key Informant Interviews Key Issues, Concerns and Proposed Recommendations.

Theme	Key Concern/issues raised	Proposed Recommendation
Land acquisition	- Delay in compensation might lead to disputes - Lack of land ownership documents might lead to conflict and delayed compensation	- Early disclosure and grievance mechanism to be developed - County Registrar to be consulted on land demarcation and adjudication. - NLC will disclose compensation awards as per constitution.
Dust and noise	Health risk to communities	- Dust suppression and monitoring of noise levels during construction. - Contractor to work during the day
Road safety	- Risk to school children - Risk to pastoralism	- Speed bumps and crossings near schools - Road Safety Awareness to extend to schools and general community
Livehood disruption	Loss of business income	- Market relocation and support programs - Provision of employment opportunities during construction
GBV/SEA risks/ Child Abuse	Increased vulnerability might occur especially to VMGs	- GBV Action Plan and awareness - Develop a Child Protection Plan and awareness
School dropout risks	Increased school going student might drop out to seek employment leading to early marriages and teen pregnancies	- GBV Action Plan and awareness to be extended to schools - Develop a detailed labour management Plan
Water use conflict	- Over abstraction of community water might result to water use conflict - Protection of community springs and water point	- Contractor to apply for water use abstraction permit. - Contractor to have his own water source for construction
Community liaison officer	To be sourced within the community to ensure grievances are resolved on time.	Request will be recommended to KeNHA
Employment opportunities	Local community to be give first priority	Local content as per guidelines is 70% casual labour.
Local Supply of construction materials	Local community to be considered in provision of raw materials such as sand, murram	Recommendation was noted.
Material sites	Contractor to ensure material sites are restored after removal of murram	- Contractor to develop a material Site restoration and rehabilitation plan. - ESMP will recommend appropriate mitigation measures.
Corporate Social Responsibility (CSR)	Requests for a clear CSR component benefiting host communities; desire	CSR priorities will be identified in consultation with community leaders and

Theme	Key Concern/issues raised	Proposed Recommendation
	for CSR initiatives that deliver long-term economic and social value	local authorities to ensure initiatives align with local development needs. All CSR requests were noted and reported in a separately in this report.
Health	- Need to improve/equip the current facilities to cater for the increased labour influx - Risk of increase in communicable such as HIV/AIDS, STI, cholera - Risk of increase in drug and alcohols use - Improved road will ease transport costs for referral and emergency cases.	- HIV/AIDs, Drug use and Alcohol Abuse programme to be institutionalised. - Request For Improvement of Health Facilities Was Noted.
Improved livelihoods and income	- Improvement of the road will increase business and incomes for the locals - Tourism will resume especially for Rimoi National Reserve and need for improvement of the access road to the gate.	These key positive impacts were noted especially on improved livelihoods and incomes brought about by accessibility and increased number of tourists.
Access Roads	If the project could at least improve access roads to key institutions like schools and other access roads linking Iten and Baringo counties	Request was noted for inclusion into the list of social requests attached.

3.4 Community Engagement Meetings/Barazas

The consultant team carried out number eight (8) meetings forming part of the community consultative meetings /baraza with both the general community and possible project affected persons from the three sub counties traversed by the proposed road corridor. This community meetings took place between 14th April -18th April 2026 whereby a total of No.1497 (F=580, M= 917) as presented in the gender disaggregated table below.

Table 3-4: Community Engagement Meetings Gender Disaggregated

Elgeyo-Marakwet County			Number			%	
Date	Sub-County	Meeting Venue	Male	Female	Total	M%	F%
8th April 2026	Kerio Valley	Kibaimwa Chiefs camp	164	306	470	34.89	65.11
10th April 2026	Kerio Valley	Arror Ward admins office	62	15	77	80.52	19.48
11th April 2026	Keiyo North	Keu Chiefs Camp	115	19	134	85.82	14.18
13th April 2026	Keiyo North	Kamongich/Rimoi chiefs Camp	178	82	260	68.46	31.54
14th April 2026	Keiyo South	Biretwo Maket	145	90	235	61.70	38.30
16th April 2026	Keiyo South	Emsea-Kibargoi Chiefs Camp	134	34	168	79.76	20.24
17th April 2026	Keiyo South	Kapkayo Chiefs camp	70	11	81	86.42	13.58
18th April 2026	Keiyo South	Kimwarer Market	49	23	72	68.06	31.94
Total			917	580	1497	61.25	38.74

3.4.1 Findings of Community Engagement and Consultation Meetings

Table 3-5: Summary of Key Community Engagement and Consultation Issues Raised and Responses

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
1.	Concerns regarding land acquisition and potential loss of ancestral land.	Land acquisition will be undertaken in accordance with the Resettlement Action Plan (RAP), consistent with national legislation and the African Development Bank's safeguard requirements. All affected persons will be identified, and compensation and livelihood restoration measures will be implemented prior to displacement through NLC.
2.	Lack of designated livestock crossing points, posing risks to animals and road users	The project design will incorporate appropriate livestock crossing points and related safety features, informed by community consultations and Road Safety Awareness creation will be emphasized.
3.	Increased risk of gender-based violence (GBV), Sexual harassment and exploitation, together with Child Abuse associated with influx of construction workers	- The Contractor will implement a GBV Action Plan, Child Protection Strategy, including Codes of Conduct for workers, awareness programs, confidential reporting mechanisms, and referral pathways aligned with national systems and AfDB requirements. - Local residents and youth will be prioritized for unskilled and semi-skilled jobs during construction, subject to contractor requirements and labour laws.
4.	Limited employment opportunities for local youth	The project will promote local employment opportunities through fair and transparent recruitment processes, with preference given to qualified local labour in line with applicable labour laws and AfDB standards at 70%.
5.	Potential soil erosion and landslides due to construction activities in steep terrain	The project will integrate erosion control and slope stabilization measures into design and construction, including drainage management, climate resilience and structural interventions, in accordance with the Environmental and Social Management Plan (ESMP).
6.	Disruption of roadside businesses and livelihoods during construction	Temporary economic displacement will be addressed in the RAP, including compensation and livelihood restoration measures for eligible affected persons, in line with AfDB safeguard requirements.
7.	Dust emissions affecting nearby households and vulnerable populations	The Contractor will implement mitigation measures as outlined in the ESMP, including dust suppression, traffic management, and continuous monitoring to minimize health impacts.
8.	Risk of exclusion of vulnerable and marginalized groups from consultations and project benefits	The project will ensure inclusive stakeholder engagement through targeted consultations and implementation of measures to enhance participation and benefit-sharing for vulnerable and marginalized groups, consistent with AfDB operational safeguards.

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
9.	Road safety concerns, particularly for school-going children and other vulnerable road users	Road safety measures will be incorporated into project design and implementation, including signage, speed calming infrastructure, and community awareness programs, in line with a recommendation to have a Road Safety Awareness Program for the project.
10.	Potential disruption of water sources and irrigation infrastructure	The project will avoid or minimize impacts on water resources through careful design such as installation of access culverts. Where impacts are unavoidable, affected infrastructure will be restored or improved in consultation with users/community.
11.	Community Liason Officers to be recruited from the community.	Request was noted and the recommendation has been outlined in the ESMP.
12.	Raised concern about elephants in the region and some roaming the households/road corridor.	The consultant acknowledged the presence of elephants, noting the project's proximity to Rimoi National Reserve. Mitigation measures will include wildlife warning signage, speed reduction zones, designated crossing points, and community sensitization to reduce human-wildlife conflict and vehicle collisions. Consultation with Kenya Wildlife Service (KWS) will also be undertaken for collaboration on appropriate mitigation measures.
13.	Community requested for several Access roads linking to markets, public infrastructure like schools, hospitals and other areas.	Access roads to public institutions such as schools, health facilities, and markets will be assessed during the detailed design phase. Feasible improvements within the project scope will be considered. This request will also be submitted to KeNHA for consideration during construction.
14.	Concern: There was a massacre in 1992, and the victims were buried along the road corridor. Inquired whether there will be a cost for exhumation and reburial. (at Sambirir Ward)	The project acknowledges the sensitivity of this concern. Any gravesites identified within the road corridor will be handled with dignity and respect. The cost of exhumation and reburial, including cultural or religious rites, will be borne by the project in accordance with Kenyan law through RAP.
15.	Materials be sourced from the community and proper rehabilitation of the borrow sites	The project will prioritize sourcing of materials such as sand, ballast, and gravel from the community where quality, quantity, and timely supply can be met. Specific arrangements will be discussed with local suppliers during implementation. Material Sites rehabilitation and restoration measures will be incorporated in the ESMP.
16.	Community members raised concerns regarding the need to improve nearby hospital and health facility services, noting that improved road access alone may not address existing gaps in healthcare infrastructure as well as serving the expected population influx during construction.	While acknowledging the importance of health service delivery, it was clarified that the road project does not include direct interventions in the health sector infrastructure. However, the project is expected to generate indirect positive impacts by improving physical access to health facilities, reducing transport time for patients, and enhancing emergency referral systems. The issue was documented and will be communicated to

No.	Issue / Concern Raised by Participants	Response Provided by Consultant / Project Team
		relevant County Government health authorities and KeNHA for consideration in their respective investment planning frameworks.
17.	Requested access culverts for access to households, proper drainage systems.	- Access culverts will be provided where necessary to maintain connectivity to homes, farms, and institutions. However, not every home may receive a dedicated culvert. Design decisions will be based on engineering standards, safety, and hydrological requirements. - Proper drainage systems will be designed as per the Hydrological studies are being conducted to ensure adequate drainage structures, including side drains, culverts, and bridges, are incorporated into the design to prevent flooding and erosion. - Box culverts will be considered where hydrological and topographical conditions require them, particularly in areas with high water flow or where access for livestock and vehicles is needed.

3.4.2 3.4.2 Focus Group Discussions

Analysis of Focus Group Discussion

Table 3-6: Summary of Male Focus Group Discussion Key Findings

No.	Category	Key issues, Expectations and proposed recommendation
1.	Land & Compensation	- Land acquisition and compensation concerns, especially ancestral and community land to be dealt with at the clan level. - Fear of delayed payment or compensation due to lack of land ownership documents and issues of successions.
2.	Livelihoods	- Employment opportunities during construction local community to be given first priority. - Labour influx might lead to increased cases of HIV/AIDS, STIs hence need for creation of awareness.
3.	Safety and Health	- Inadequate Road safety features, training and awareness might lead to increased traffic accidents during construction and operation of the project. Hence the men in the community requested for adequate creation of awareness especially to school going children. - Increased accident risk along construction zones - Traffic Management Plans and safety awareness to be implemented
4.	Improved Security	Response time from the police or other security agencies will be prompt due to the improved road and accessibility.
5.	Loss Livelihoods	During construction disruption of access to farms and grazing areas might be restricted
6.	Environmental Management	Increase in dust and noise pollution causing increase in respiratory diseases.

7.	Grievance Redress Mechanism	Need for the project to employ/source community Liasson officer from community to hasten resolution of grievances.
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Table 3-7: Summary of Women Focus Group Discussion Key Findings

No.	Category	Key issues, Expectations and proposed recommendation
1.	GBV/Social Risks	- Risk of gender-based violence (GBV) due to influx of workers - Increase in number of schools drop outs to join workforce - Increase in number of early marriages and teen pregnancies. - Increase in HIV/AIDs, STI prevalence hence need for awareness during construction.
2.	Livelihoods / Gender Inclusion	Limited participation of women in employment opportunities during construction.
3.	Road Safety	- Increased road safety risks for children and pedestrians - Traffic Management Plans and safety awareness to be implemented
4.	Livelihoods	Disruption of access to water points, farms or firewood collection areas, may increase burden on women daily activities.
5.	Health / Environment	Health concerns including increased dust emissions may increase cases of respiratory diseases.
6.	Grievance Redress Mechanism	Inclusion of women into the Grievance redress committees

Table 3-8: Summary of Youth Focus Group Discussion Key Findings

No.	Category	Key issues, Expectations and proposed recommendation
•	Livelihoods	- Employment and apprenticeship opportunities for the youth - Local youth to be given first priority in both skilled and unskilled job opportunities.
•	Economic Opportunities	Increase in new Business opportunities (suppliers, transport, services) for the community especially youth.
•	Road Safety	- Increase in Road safety risks for motorbike riders (boda-boda) especially during project operation. - Need for road safety awareness creation and targeted training. - Traffic Management Plans and safety awareness to be implemented.
•	Social Risks /GBV	- Drug and alcohol abuse risks linked to construction workforce - Need for awareness creation Programme - Risk of gender-based violence (GBV) due to influx of workers - Increase in number of schools drop outs to join workforce - Increase in number of early marriages and teen pregnancies. - Increase in HIV/AIDs, STI prevalence hence need for awareness during construction.
•	Capacity Building	Consideration to be given on the job skills training and skills opportunities

In general, the Focus Group Discussions demonstrated clear differences in priorities across gender, Men largely emphasised land, livelihoods, and safety concerns; women highlighted social risks, health, and household impacts; while youth focused on employment, economic opportunities, and social behaviour risks.

Cross-Cutting Gender and Social Findings

- a) Women's Economic Inclusion: Requests were made for empowerment of women groups, SACCOs, fair employment opportunities, and protection of women traders' livelihoods.

- b) Youth Priorities: Youth employment, bursaries, scholarships, and prevention of school dropout were recurring issues.
- c) Health and Care Services: Frequent requests were made for maternity wings, dispensary upgrades, hospitals, anti-venom supply, and referral health facilities.
- d) Inclusive Employment: Communities requested inclusion of women, youth, PWDs, and host communities in project jobs.
- e) Protection and Social Risk Management: Concerns were raised on child labour, labour influx, worker conduct, transparency in recruitment, and broader cultural/social impacts.
- f) Women's priorities center on water, food security, safety, and inclusion
- g) Men prioritize land, livestock mobility, and employment
- h) Youth prioritize jobs, skills, and inclusion in decision-making

3.5 Summary of Corporate Social Responsibility Requests from Stakeholders.

The following section summarizes the Corporate Social Responsibility (CSR) requests raised during the key stakeholders' consultation meetings for the proposed Great Rift Economic Development Corridor, covering No.3 Sub-Counties that is Keiyo North, Keiyo South, Kerio Valley were the Phase 1 project lies. The requests reflect the needs and priorities of local communities, including infrastructure, health, education, water, environmental conservation, and livelihood restoration support. The community was informed during the meetings that their requests would be forwarded to the KeNHA for assessment and consideration.

Local communities and the County Government have jointly identified **over 120** social infrastructure requests along the 70 km main road and two planned spur roads. These have been grouped into 15 investable categories across key locations: Murkutwa, Arror, Emsea, Kapkayo, Nyaru, Biretwo, Kiwmarer, Emsoo, Tambach and the Governor's priority areas.

Table 3-9: Categories of Requested Social Infrastructure

Category	Description
1. Health	Hospitals, dispensaries, maternity wings, health center upgrades
2. Education	Schools, dormitories, boarding facilities, TVET, teachers' college, special school
3. Water & Sanitation	Boreholes, piped water, springs, pan dams, irrigation canals
4. Markets & Trade	Modern markets, cooling plants, cold storage, cattle dip, revolving funds
5. Value Addition & Industry	Mangoes, meat, potatoes, groundnuts, coffee processing factories/plants
6. Access Roads & Bridges	Feeder roads, link roads, town roads, security roads, bridges
7. Digital Infrastructure	Fibre optics, ICT infrastructure, street/security lighting
8. Sports & Recreation	Football fields, stadiums, sports training facilities
9. Tourism	Chebloch Gorge tourism center, Rimoi National Reserve access, bridge to Kapnorok
10. Governance & Security	DCC's office, police station, security lighting, materials testing lab
11. Livelihoods & Environment	Youth skilling, scholarships, environmental restoration, irrigation, pan dams

Table 3-10: Location Specific Corporate Social Responsibility Requested from the Key Stakeholders Meeting

Venue	Request
Murkutwa (Sambirir Ward)	1. A dormitory at Chesetan Primary School 2. Access Road linking Elgeyo -Marakwet and Baringo County 3. Market at Murkutwa 4. DCC's Office 5. Improvement of feeder roads in the area 6. Boys' dormitory at Queen of Peace School 7. Drilling of boreholes in Mon 8. Football field for Mogil Primary School 9. Access roads to schools along the corridor 10.
Arror	1. Upgrading of Kapchemutwa dispensary include a maternity wing 2. Construction of modern market at Arror Ward 3. Value addition projects: mangoes factory and meat processing facility 4. Fiber optic along the corridor 5. Police station 6. Additional roads: a. Arror-Koitolial -Katee- 16km b. Chegilet-Kapchelaal-Chebiemit-Anin – 33km c. Rimoi Access Road – 10km d. Tunyo-Sisya-Kapsowar- 10km e. Security road: Chesiy- Loposho-Bridge-Kipnai- 15km 7. Water boreholes 8. Water spring at Arror 9. TVET 10. Construction of classes at Kapsawach Primary School
Governor's Office	1. Access roads: a. Chegilet-Kapchelaal-Chebiemit-Road b. Kabulwo c. Muskut-Simiti-Cheroget d. Access roads to institutions e. Town roads within centres: Biretwo, Arror, Chesongoch and Nyaru 2. Modern markets at Biretwo, Arror, Chesongoch and Nyaru 3. Modern Hospitals: a. Ino. fully equipped hospital in Arror, Chegilet and Muskut and consider including a maternity wing b. Upgrading referral hospital in Iten and Kapsowar 4. Livelihoods a. Irrigation canals and pan dams at Biretwo, Kabulwo, Kimwarer and Arror 5. Youth skilling programs and institutions along the project corridor 6. In-built fiber optic along the corridor 7. Environmentally friendly livelihood programme: environmental restoration of the escarpment; training of the locals on how to grow crops on the escarpment without damaging the environment 8. Value addition- mangoes factory for mangoes at Arror and Chesongoch 9. Value addition- potatoes factory at Nyaru 10. Modern girls boarding school at Chesongoch, Chesetan and Kimwarer 11. Boreholes or pipe water to schools in the project area 12. Access road to Rimoi National Reserve

Venue	Request
	13. Materials testing laboratory in the county 14. Establishment of sports training facility 15. Construction of a bridge connecting Rimoi National Reserve and Kapnorok Reserve in Baringo County
Emsea	1. Upgrading of a dispensary at Emsea to be a health center and should include a maternity wing 2. Access Roads: a. Emsea-Kaptere b. Emsea -Muskut c. Access to Emsea Secondary and Primary Schools 3. A Market at Emsea 4. Chebloch Gorge Tourism Centre 5. Upgrade Emsea Secondary School to be a boarding school 6. Upgrade a stadium at Emsea 7. Develop ICT infrastructure 8. Security lighting at Emsea 9. Bitumen road to the Technical and Vocational Education Training facility 10. Construction big parking at Chebloch gorge 11. Fiber optic along the corridor 12. Drill boreholes in every location 13. Extend the tarmac to institutions along the road 14. 1no. Mangoes factory 15. 1no. link road from the valley (Muskut) to Chepkorio 16. Street lighting at Emsea and every centre 17. Improve cattle dip at Emsea 18. Improve Kapsoo primary by building two dormitories, dining hall and kitchen 19. Cooling plants for fruits and milk 20. Pave access roads at the divisional head quarters 21. Improve Muskut hospital 22. Construct a bridge at Melwo 23. Provide revolving fund for women 24. Scholarship for youth 25. Cold storage facility for Tomatoes 26. Improve Melon boys school 27. Improve access road from Changach to Kapsoo 28. Establish teachers' training college in Emsea 29. Improve Chepsigot special school 30. Drill 4 no. boreholes at Sego, Melo primary, Emsea
Kapkayo	1. Fiber optic especially at Chepsirei where is a school and National Youth Service College 2. A hospital with a maternity wing 3. Access roads: a. Chemoibon-Kachalwo b. Kapkayo-Kachalwo 4. Development of Kapkayo Market 5. Stadium and ICT at the TTI 6. Lighting at Koimur centre 7. Boarding facility at Koimur Primary School 8. improvement of health facility at Kapkayo or improvement of fluorspar health centre 9. piped water to Kapkayo market- the water can come from the river or borehole 10. security improvement at TTI 11. Value addition for groundnut- frying and packaging

Venue	Request
	12. Coffee plant at kippokpo
Nyaru	1. Installation of Fibre optics 2. Health centres. Level 2 dispensary to be upgraded to say level 4, and to include a maternity wing 3. Schools. Build a Special pry school and preferably to be a boarding school. 4. Construction of a modern Market 5. Construction of Kalwal access rd. The area is a coffee growing zone 6. Construction of a Potatoes cooling plant 7. Provision of a training field for youth 8. Scholarships for students 9. Collecting shades for farmers along the road.
Tambach /Rimoi areas	1. Upgrading of schools' laboratory, classrooms, 2. Upgrade Rimoi Dispensary 3. Borehole in the area 4. Planting of trees- All Corridor 5. Tarmac all feeder roads to the farms near river Kerio 6. Tarmac Nyawar Rimoi road joining the main road to Iten-its apx 10km 7. Upgrade Donge to Tambach road 8. Next to the Rivers 9. Street lights at Rimoi center 10. Sponsorships for their children & support the VMGs
Biretwo	1. Walbei primary School improvement of the facilities such as laboratory, gate 2. Completion of Biretwo community hospital- need a mortuary, wards, maternity ward & water tanks 3. Market- County Government have already allocated funds for this 4. Borehole at Chepsigot special school 5. Tree planting All Corridor especially in schools 6. 2km Biretwo town roads 7. Access road to Chepsigot chief's office 8. Access road to Katubei primary & secondary school 9. Kapchelimo- Kalwal access road 10. Walbei primary School improvement of the facilities such as laboratory, gate 11. Completion of Biretwo community hospital- need a mortuary, wards, maternity ward & water tanks 12. County Government have already allocated funds for this 13. Borehole at Chepsigot special school 14. All Corridor especially in schools 15. 2km Biretwo town road 16. Access road to Chepsigot chief's office 17. Footbridge to Access Road to Kaptubei primary & secondary school Kapchelimo- Kalwal access road ICT center at Biretwo Bursaries for collage & university students Build Biretwo police station Social hall at Biretwo
Baringo/Emon (Community Neighboring Kapkayo)	1. Emon School facilities to be improved 2. AIC Mogura school equipped with boarding facilities 3. Mogura and Kapkewa Health Center to be equipped with maternity wing and other wards 4. Streetlighting at the market 5. All corridor 6. Improve River Kiptunoi Bridge and access road 7. Box Culvert at River Mogura 8. Levelling of Chamblus playing ground

Venue	Request
	9. At Mogura and Kapkewa health center
Emsoo Ward Community	1. Improvement of school facilities such as equipping of Laboratory, supply of electricity 2. Fruit Collection Center 3. Construction of water pans/boreholes in some areas 4. All Corridor for tree planting 5. Tarmacking of Chegilet- Kapchelal- Chebiemit, Tungo- Kapsowar, Kabulwo- Barwesa 6. Installation of Fibre Optic 7. Construction of a parking bay/rest area at Kabulwo Market 8. At the Kabulwo Market

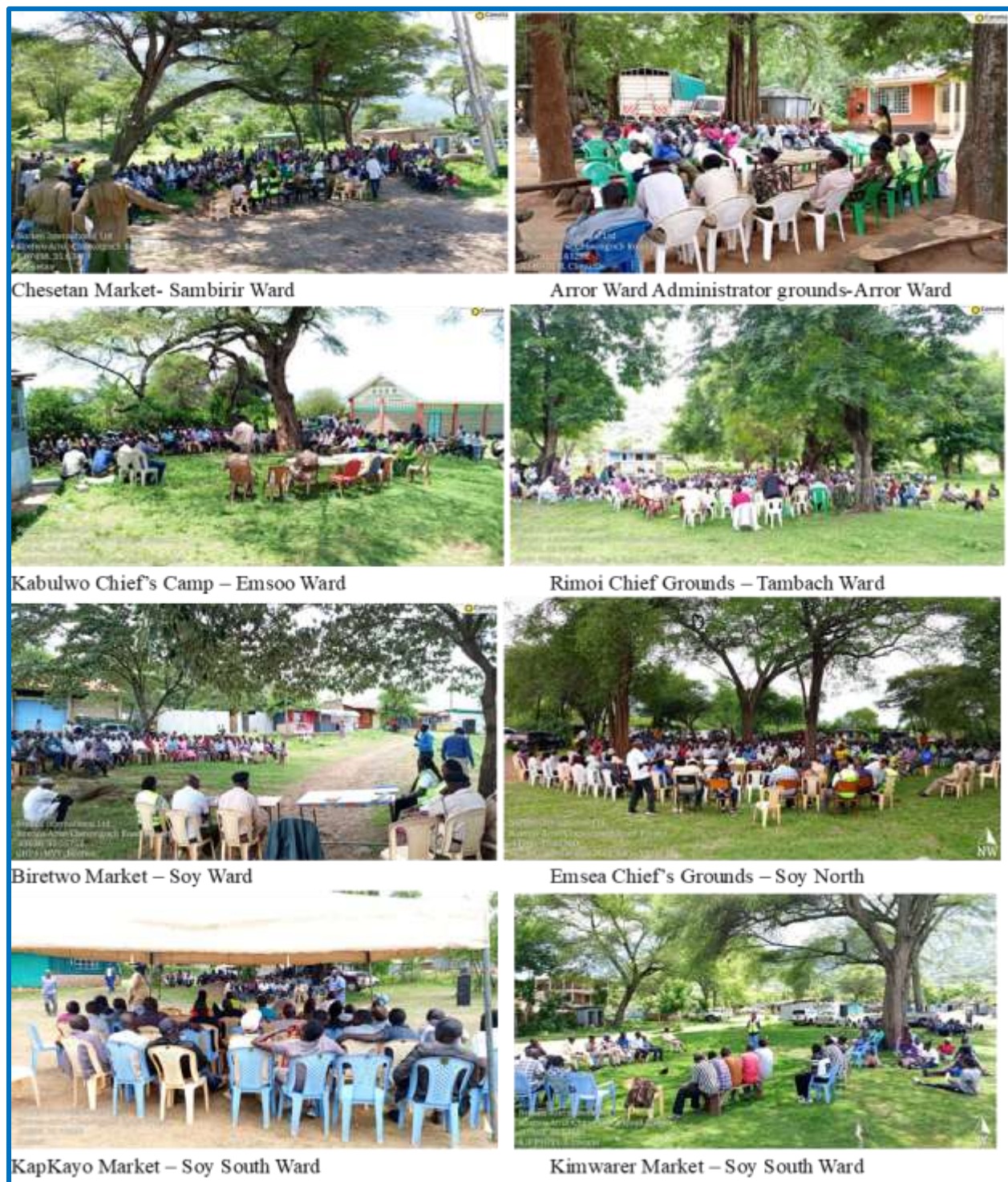


Plate 3-1:Figure 2- 1: Illustration of Community Meetings /Barazas in The April 2026.



Plate 3-2: Illustration of Key Leaders Meeting (entry level meetings) in December ,2025

3.6 How Stakeholder Feedback Has Influenced Project Design

Table 3-11 below demonstrates how stakeholder feedback received during the entry-level meetings and subsequent consultations has informed project design and implementation, in line with the requirements of the AfDB ISS Operational Safeguard 10 (OS10) Guidance Note (paragraph 11).

Table 3-11: How Stakeholder Feedback Has Shaped Project Design

Stakeholder Feedback	Design Change Made	Location/Application	Status	Justification if Not Incorporated
Concern about cut sections causing slope erosion and degradation	ESMP includes enhanced slope protection: retaining walls at high-risk cut sections (Km 25-35, Sambirir); hydroseeding; drainage channels	Sambirir (Mogil, Chesetan)	Incorporated	N/A
Request for pedestrian crossings near schools	Speed bumps, rumble strips, marked crossings at: Arror Primary (Km 22), Emsea Primary (Km 118), Nakapelewoi Primary (Km 5), Kipsaina Primary (Km 95) among others	All Corridor	Incorporated into detailed design	N/A
Concern about open excavations posing danger	Traffic Management Plan requires: fencing of excavations >1m deep; warning signage; lighting at night; community awareness before excavation	All construction zones	Incorporated into ESMP and contractor obligations	N/A
Request for bus stations and boda-boda sheds	Feasibility assessment for bus stations at: Arror (Km 22), Chesongoch (Km 72), Nyaru (Km 95). Boda-boda sheds at these locations plus Emsea (Km 118)	All centres and Junctions	Under assessment	If not feasible, alternative locations identified with community input
Concern about water supply lines	KeNHA to coordinate with WRA and water service providers to map and mark all water lines before construction. Replacement/relocation at project cost	All corridor	Incorporated into ESMP	N/A
Request for boreholes and water points as CSR	Documented for contractor CSR allocation. Boreholes prioritized in water-scarce areas: Chesongoch, Mogil, Koitilial among others.	All trading centres and	Under consideration (see Section 3.4)	Budget constraints may limit number; selection based on technical feasibility and community need
Concern about compensation for roadside traders	RAP includes business disruption compensation. Traders paid for lost income during construction. Valuation of business stock underway	All trading centres (Arror, Nyaru, Emsea, Chesongoch)	Incorporated into RAP	N/A
Request for tree planting to offset vegetation loss	KeNHA tree planting programme: minimum 10,000 native trees along corridor. Community engaged in planting and maintenance	All corridor	Incorporated into ESMP	N/A

Concern about contractor not restoring borrow pits	Contractor agreements include specific clauses on borrow pit restoration to original condition (or agreed alternative use). NEMA license conditions also require restoration	All borrow pit sites	Incorporated into procurement documents	N/A
Concern about GBV and worker conduct	Code of Conduct mandatory for all workers. SEA/SH referral pathways established with local health facilities and GBV recovery centres. Community sensitization planned	All construction sites	Incorporated into ESMP and contractor obligations	N/A
Request for sourcing of community liaison officer (CLO) from the community	Enhance communication, stakeholder engagement, timely grievance resolution, and proactive management of social risks due to the sensitive nature of the community.	All locations	Incorporated into ESMP and contractor obligations	N/A

3.7 Engagement Schedule (First 12 Months)

In compliance with AfDB ISS OS10 Guidance Note paragraphs 8, 10, and 16, the following site-specific engagement schedule identifies specific dates, locations, and stakeholder groups for each engagement activity.

Table 3-12: Round one of Stakeholder Meetings / entry level

S/No	Date	Stakeholders	Meeting Venue	Agenda
1.	8 th December 2025	Kerio Valley	Arror Community Library	Project entry level meetings, disclosure of project design, ESIA and RAP Process. Attendance was Key stakeholders, leaders from county and sub county officer, national government leaders, community opinion leaders, PWD's, farmers representatives, women group leaders, NGO's, CBO's, Area Member of Parliament, Sub County Administrator.
2.	8 th December 2025	Keiyo South	Biretwo-Child Fund Board Room	
3.	9 th December, 2025	Keiyo South	Muskut- Asst. Chief Office	
4.	9 th December, 2025	Keiyo South	Nyaru- Chief's Office	
5.	10 th December, 2025	Keiyo South	Kamwosor- Community Hall	
6.	10 th December, 2025	Kesses	Kesses-DCC Office Hall	
7.	11 th December 2025	Ainabkoi	Ng'arua-RCEA Church Hall	

The minutes and attendance records of the first round of the stakeholder meetings are provided in Annex 1-1 of this SEP.

Table 3-13: Second Round Meetings with General Community

Date	Location	Activity	Target Stakeholders	Engagement Method / Tool	Responsible Person / Team
8th April, 2026, Wednesday	Sambirir Ward (Chesetan, Murkutwa, Kiptumbur, Mogil, Mon)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process /Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
9th April, 2026, Thursday	Kerio Valley Sub County	KII	County Government Offices/Sub County (Chesongoch)	Face- Face Interview Courtesy Visit/Letter	Sociologist/Environmental/Gender Specialist
10 th April, 2026, Friday	Arror Ward (Arror & Chesuman)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process	General Community (women, men and youth) PAPs Vulnerable Groups	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist

Date	Location	Activity	Target Stakeholders	Engagement Method / Tool	Responsible Person / Team
		/Baseline Household Survey	Local administration Opinion Leaders		
11th April, 2026, Saturday	Emsoo Ward (Chegilet & Kabulwo)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process/Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
13 th April, 2026, Monday	Tambach Ward (Kiptuilong & Rimoi & Komongit)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process/Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
14 th April, 2026, Tuesday	Soy North (Biretwo, Chepsigot & Epke)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process/Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
15 th April, 2026, Wednesday	Keiyo North/Iten	KII	County Government Offices/Sub County	Face- Face Interview Courtesy Visit/Letter	Sociologist/Environmental/Gender Specialist
16 th April, 2026, Thursday	Emsea (Kibargoi, Chop, Muskut)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process /Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist

Date	Location	Activity	Target Stakeholders	Engagement Method / Tool	Responsible Person / Team
17 th April, 2026, Friday	Kapkayo (Chemoiben)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process /Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
18 th April, 2026 Saturday	Soy South (Turesia, Tumeiyo, Chop, Kōmūr, Nyaru, Kimwarer)	Project Disclosure at the community level, ESIA, Gender Assessment and RAP Process /Baseline Household Survey	General Community (women, men and youth) PAPs Vulnerable Groups Local administration Opinion Leaders	Baraza FDG Enumerator Training	Sociologist/Environmental/Gender Specialist
20 th April, 2026 Monday	Keiyo South Sub County Offices	KII	Sub County KII	Face- Face Interview KII	Sociologist/Environmental/Gender Specialist

The minutes and attendance records of the second round of the stakeholder meetings are provided in Annex 1-2 of this SEP.

3.8 County and National-Level Institutional Engagement

In addition to community and PAP-level consultations, the project undertook engagements with county and national-level institutions whose mandates are relevant to land acquisition, environmental regulation, wildlife management, regional development, public administration, security, livelihood restoration and project implementation. These included the National Land Commission, NEMA, Kenya Wildlife Service, Kerio Valley Development Authority, County Government departments, National Government Administration Officers, security agencies and other relevant technical departments. These engagements provided guidance on land acquisition procedures, environmental approval requirements, wildlife and human-wildlife conflict risks, security concerns, regional development priorities, livelihood restoration opportunities and coordination arrangements required during project implementation. The outcomes of these engagements have informed the SEP, RAP, ESIA, ESMP, LRP and security-related recommendations.

Table 3-14: Summary of Key Informant Interviews (KIIs) – Biretwo–Arror–Chesongoch Road Project

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
9th April 2026	Mogil Health Facility	Sammy Rotich (In-charge)	To gather baseline information, assess potential project impacts, health impacts, disease prevalence, impact of proposed road activities on the health facility and recommendations during project implementation.	Catchment area: 2 locations, 4 sub-locations (~5,000 people served); ~25–30 patients/day • Services: outpatient, inpatient, maternity, CCC, TB, 24-hour operation • GBV cases mostly resolved at household/elder level; some referred to police • Nearest mortuary in Tot; new mortuary nearing completion in Tunyo • Referrals to Chesongoch, Kapsowar and Iten; reliant on police/ambulance from Chesongoch Mission Hospital • 34 inpatient beds; mostly boda-boda-related accident cases • 10 Community Health Promoters; outreach covers immunization, deworming, elderly care • Referral, emergency transport and internal access-road challenges (uphill terrain)	• Requested CSR support for: water connection (currently via Mogil Catholic Church), maternity wing improvement, and upgrade of access road to the facility. • Improvement of the facility to the next level to cater for high influx of workers and pressure on the current human resources too.	CSR requests noted for project consideration. Continuous engagement during Project Implementation.

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
9th April 2026	Mogil Police Station – Gender Desk	Kiprono Arap Mutai	To gather baseline information, assess potential project impacts, assess gender issues and current referral pathways within the project area.	Common GBV cases: assault and defilement; many go unreported - Referral pathway: report → P3 form → hospital exam → police review → arrest - Other conflicts mainly land disputes (clan-allocated land, undocumented cases due stigma and cultural issues) - Challenges experienced reported were vehicle wear/tear, delayed response, difficulty reaching mobile courts in Tot, high transport costs, difficulty transporting suspects to remand due to the terrain and under funding from National government.	The improvement of the road will enhance emergency response challenges.	Continuous Engagement during project implementation
14th April 2026	County Directorate of Pre-Primary & Vocational Education, Training	Paul Teno	To gather baseline information, assess potential project impacts, and collect views and concerns of learning facilities as most are near the road corridor.	Many primary schools sit along the proposed corridor; risk of losing fences/gates and playground land; some school land undocumented - Other impacts: dust, noise, road safety, deforestation, school dropouts, HIV/AIDS, cultural erosion; risk to sacred trees (Ariek/Aroon), medicinal sites, quarries and traditional furrows - VTCs: Koitilial (Arror Ward) and Chesongoch (Endo Ward); courses	Recommended community sensitization on project risks, targeted school campaigns, pedestrian crossings/flyovers/zebra crossings and safe access to valley schools. CSR support suggested: irrigation, capacity building/skills training, value addition, and	Recommendations for CSR consideration Continuous Engagement during project Implementation.

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
				in masonry, plumbing, welding, beauty, dressmaking - Schools mapped by ward along the corridor; Tambach Teachers College being converted to a Moi University branch (not yet operational) - Transition rate ~85%	scholarships (secondary, VTC, university levels).	
14th April 2026	Police Gender Desk, Biretwo Police Post	Corporal Mercy Jeruto Kirwa	To gather baseline information, assess potential project impacts, assess gender issues and current referral pathways within the project area.	Common cases: assault, malicious damage, land disputes, and defilement (often within family/neighbors), largely underreported - Referral pathways for defilement and assault cases; hotline available for child-related cases - Main referral: Iten County Referral Hospital (free); other hospitals charge ~KES 1,000 - No NGO/CBO support; officers self-fund transport for victims when needed - Challenges: poor roads increasing response time and cost, no dedicated office (shared holding cell), reliance on personal resources	- Request for improved police station facility and road/emergency - Access challenges noted for project consideration. - Improvement of the facility to the next level to cater for high influx of workers and pressure on the current human resources too.	Continuous Engagement during project implementation

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
20th April 2026	County Department of Gender and Social Services	Benard Kemboi	To gather baseline information, assess potential project impacts, and collect livelihood restoration activities undertaken by the county, Gender Based Violence rates and County response plans.	Mandate: grants for income-generating activities (posho mills, sheep, PA systems, tents/chairs) to women, youth and PWD groups - Also supports PLHIV groups, men-care groups, chiefs/elders and mixed self-help groups - Grants are non-refundable, subject to M&E, training in proposal writing/financial management; coordinated via chiefs/ward admins - Eligibility: active, registered, valid/renewed certificates; vetting committees ensure fair sharing - Other roles: livelihood restoration, PWD assessments, sensitization; indicative costs for common needs (poultry, tents, chairs, sheep) provided - GBV and FGM reported as common in Marakwet (notably Endo and Arrior Wards); cultural barriers to reporting; department faces resistance/threats during interventions	Information shared to guide livelihood-restoration and CSR planning for project-affected groups.	Continuous Engagement during project implementation

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
15th April 2026	Kenya Wildlife Service (KWS) – Iten	Nelson Cheruiyot (Warden)	To gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations on the proposed road corridor and linkage to the Rimoi National Reserve.	Rimoi National Reserve managed by County Government (devolved function); KWS mandate covers conservation, human–wildlife conflict (HWC) management and environmental protection • Reserve hosts 700+ elephants plus carnivores, reptiles, grazers and birds • Challenges: HWC (worse in rainy season), destroyed 33km perimeter fence, blocked migratory routes, poaching, poor road network limiting access/revenue and emergency response • HWC types: crop destruction, livestock predation, human injuries/fatalities • Grievance mechanism: KWS bases at Tot, Chebilil, Kabulwo; community-inclusive committee; crop-damage compensation at market rate; KES 5 million for fatalities; injury compensation varies; snake-related claims capped nationally • KES 21 million paid out for 334 community claims to date	• Recommended: extend tarmac road to Rimoi Reserve gates; improve road safety to reduce human/wildlife/livestock accidents; provide diversion routes during construction for distress-call response.	Recommendations incorporated into design consideration

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
				- Mitigation measures: fence maintenance, sensitization, more water points, more KWS bases/vehicles - Environmental protection: bans on sand harvesting and tree cutting in reserve, sensitization programmes - KWS CSR: KES 2M plus cement for Chesongoch landslide victims; dormitories/classrooms built in Kabulwo, Tot and Chebili schools		
15th April 2026	Elgeyo Marakwet County Water and Environment Department	Felix Rotich (Director – Water)	Gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations on environment and water catchment/ basin within the road corridor.	Mandate: pipelines, water pans, dams, boreholes, spring protection, catchment conservation/tree planting, fruit-tree promotion, FMNR practices - Current challenges: slow mobility, frequent flooding disrupting infrastructure/access, vehicle damage from rough terrain - Anticipated positive impacts: improved accessibility, trade, security and economic growth - Legal framework in place governing rural water supply/management - Anticipated negative impacts: tree loss, soil erosion, potential community conflict over land/resources	- Recommended protection of existing piping systems during road construction and operation to avoid damage and service disruption. - Maintain irrigation furrows downstream of Kerio Valley as they support agriculture and food production downstream of the road corridor.	Recommendation incorporated for mitigation planning.

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
				- Pollution not currently a major issue; monitored by NEMA - Two water service providers in county (incl. Cherangany-Marakwet Water & Sanitation Co.)		
9th April 2026	Arror Boda-boda Self-Help Group	Obadiah Chebet (Treasurer)	To gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations: representation of boda-boda operators and transport services	Group established 2017; 57 registered (male-dominated but open) members; elected leadership - Challenges: poor roads raising travel time/costs and cutting daily trips/income; insecurity in Chesuman/Kibaimwa; high motorcycle maintenance costs; seasonal impassability (Kakmet, Kapkataa, Cheptarbei, Chesongoch); limited access to rider training - Anticipated benefits: improved mobility, faster security response, local trade growth, more trips/income, better drainage, easier fuel access - Negative impacts: land/property loss, land fragmentation, higher accident risk, possible rise in theft (incl. livestock) - Construction-phase risks: pollution, accidents, possible rise	Group expressed strong support for the project; requested fair and timely compensation for land/property and proper mitigation planning. Improve roads and drainage; enhance security; provide road safety training opportunities;	Continuous engagement during project implementation.

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
				in STIs from worker influx, crop/grazing land destruction		
9th April 2026	Kerio Valley Development Authority (KVDA)	Benjamin Kitur	To gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations on agricultural development and support services.	Operates 5 seedling nurseries, main farm at Chepkum, demonstration farm at Tot • Mandate: agricultural extension services and subsidized seedling production/sales • Anticipated benefits: better farm/market access, reduced travel time, wider seedling distribution, stronger local economy • Negative impacts: possible farm relocation and crop/land destruction along the corridor • Construction risks: landslides (area is slide-prone), possible community resistance, temporary road closures/diversions limiting farm access • Existing challenge: poor road network limiting access to farms/markets	• KVDA expressed strong support for the project and recommended proper planning/mitigation, particularly for affected farmers and agricultural land.	Continuous Engagement during project implementation.
9th April 2026	Aror Mission Health Centre	Joel Chelimo	To gather baseline information, assess potential project impacts, and collect	Established 1978 on community- donated land; catchment spans 5 sub- counties (Marakwet West/East, Keiyo	Requested support: perimeter fence, vaccine storage refrigerators, additional patient ward.	Requests noted for CSR/mitigation consideration

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
			stakeholder views and recommendations on provision of healthcare services	North, Baringo North, Tiati); 24-hour operation - Services subsidized but fee-based; staffed by 19 (4 nurses, lab tech, clinician, admin/support staff) - Accessibility affected historically by insecurity (now improved) and seasonal flooding; relies on a single 4x4 ambulance - Referrals to Iten (~60km) and Kapsowar for severe malaria, CS deliveries, fractures; first aid given before referral - GBV cases: medical assessment and report prepared to support police OB entry - Prevalent illnesses: malaria, typhoid, TB, pneumonia (children); malaria, typhoid, brucellosis, anaemia (adults) - Construction/operation health risks: reduced facility access, road accidents, dust-related respiratory issues, STIs, utility disruption, unpaid bills after improved mobility - High prevalence of STIs and HIV/AIDS in the Arroy area	- Recommended protection of utilities (water), community awareness on communicable diseases/STIs/HIV, and road-safety promotion. - Support construction of fence, ward and vaccine utilities, conduct health and road safety awareness programs.	

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
10th April 2026	Arror Women Traders Association	Georgina Komen	To gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations on economic empowerment of women traders in the area.	Established 2022; 50+ members, 13-official leadership structure incl. disciplinary committee and savings/loans unit • Mandate: financial empowerment through savings and member loans; weekly Wednesday meetings • Challenges: 2025 community clashes caused displacement and loan defaults, weakening group finances; missed grant/funding opportunities during inactivity; poor roads limiting market access and delaying/lowering value of produce deliveries; some markets inaccessible • Anticipated benefits: business growth, wider market access, more traders/customers, construction-phase employment • Negative impacts: possible demolition of shops/premises along corridor, impact on Arror Shopping Centre, risk of STIs, increased road accidents	• Recommended minimizing destruction of Arror trading center property, fair and timely compensation, road-safety awareness, and communicable-disease awareness programmes.	Continuous Engagement during project implementation

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
9th April 2026	St. Teresa Mission Hospital, Chesongoch	Facility representative (In-charge) Sister Jackline	To gather baseline information, assess potential project impacts, and collect stakeholder views and recommendations on health care services and linkage to the proposed project.	Catchment area: serves Endo Ward and neighboring communities in West Pokot County (near county boundary); receives referrals from surrounding health centres/dispensaries • Services: outpatient, inpatient, maternity, comprehensive maternal/child health, laboratory, pharmacy, HIV/CCC, TB, emergency care, nutrition, minor/major surgery; 24-hour facility • GBV cases: few reported; survivors receive clinical management, counselling, documentation and referral to Police/Children Services; underreporting due to stigma and preference for informal resolution • FGM prevalent but largely unreported; facility mainly sees survivors with severe complications • Mortuary services referred to Tot • Referrals: Tot Sub-County Hospital, Kapsowar Hospital, and Moi Teaching & Referral Hospital (Eldoret), depending on severity	• Road improvement flagged as key enabler that would speed emergency referrals, cut travel time for patients/ambulances, improve accessibility in rainy season access, ease delivery of medicines/supplies, and increase service utilization by remote communities.	Continuous Engagement during project implementation.

Date	Institution	Representative	Purpose	Main Issues Discussed	Action Agreed / Recommendations	Status
				- Accidents: mostly boda-boda related road traffic injuries; minor cases managed on-site, severe trauma stabilized and referred - Works with Community Health Promoters on household health education, disease surveillance, maternal/child follow-up and referrals - Outreach: immunization, antenatal/postnatal clinics, nutrition screening, HIV testing/counselling, school health programmes, community education Challenges: poor road conditions in rainy season, delayed emergency referrals, long patient travel distances, staffing constraints, limited ambulance/medical resources		

3.8.1 Engagement with the National Land Commission

KeNHA, as the project developer engaged the National Land Commission (NLC), the constitutional body mandated to administer compulsory acquisition of land on behalf of the national and county governments for public purposes in accordance with the Constitution of Kenya and the Land Act, 2012. As part of the land acquisition process for the Project, the NLC will undertake the statutory procedures, including publication of the necessary notices, inspection of the affected land, valuation and verification of affected interests, determination of compensation, preparation of compensation schedules, award of compensation, and taking possession of the acquired land in accordance with the applicable legal framework.

During the project preparation, engagement with the NLC was undertaken and which focused on the statutory land acquisition process, roles and responsibilities of KeNHA and NLC, requirements for publication of acquisition notices, verification of affected land and assets, valuation procedures, compensation awards, disclosure to PAPs, grievance handling and timelines for compensation prior to displacement. The discussions also emphasised the need for close coordination between KeNHA, NLC, County Government, local administration and PAPs to ensure transparent verification, timely communication and proper documentation of all land acquisition decisions. The outcome of the engagement with the National Land Commission was the joint validation of impacts associated with the road, joint valuation process and determination of the PAPs asset compensation values as well as issuance of PAPs RAP acknowledgement forms as part of the RAP preparation.

3.9 CSR Decision-Making Framework

In response to stakeholder CSR requests documented in this section the following framework governs how CSR requests will be evaluated, selected, and implemented. This framework ensures transparency, equity, and alignment with project impacts.

Table 3-15: Guiding Principles to CSR Decision Making

Principle	Description
Impact linkage	Priority given to CSR activities that directly mitigate project impacts or enhance project benefits for affected communities
Community need	Requests addressing basic services (water, health, education, safety) prioritized
Feasibility	Technical viability, availability of land, alignment with county development plans
Sustainability	Preference for activities that communities can maintain post-project
Equity	Distribution across sub-locations proportionate to impacts, with consideration for vulnerable groups
Transparency	Decision-making documented and communicated to all stakeholders

Table 3-16: CSR Request Evaluation Process

Step	Activity	Timeline	Responsible	Output
1	Compile all CSR requests from consultation records	Month 2	CSO + CLOs	Master CSR request list (Shared Separately)
2	Screen requests against guiding principles (impact linkage, feasibility, sustainability)	Month 2-3	Social Safeguards Specialist + KeNHA	Shortlisted requests
3	Conduct technical feasibility assessment for shortlisted requests	Month 3	Design team + County technical departments	Feasibility reports
4	Estimate costs for feasible requests	Month 3	Quantity surveyor + CSO	Cost estimates
5	Allocate available CSR budget (see Section 4.3 – separate from SEP budget)	Month 3-4	KeNHA management	Budget allocation
6	Validate selected CSR activities with affected communities (meetings in each sub-location)	Month 4	CSO + CLOs	Validation minutes
7	Document selected CSR activities in CSR Implementation Plan	Month 4	KeNHA + CSO	CSR Implementation Plan (separate document)
8	Disclose CSR decisions (selected and rejected) with justifications	Month 5	KeNHA website + community meetings	Disclosure report

Table 3-17: CSR Request Categories and Decision Matrix

Request Category	Example Requests from Table 3.3	Impact Linkage	Feasibility	Priority Level	Decision Status (to be completed)
Water infrastructure	Boreholes (Arror, Chesongoch, Mogil, Koitilial); water pipeline (Nyarur)	High – water access may be temporarily disrupted during construction	Medium – requires hydrogeological assessment	High	Under assessment
Education	Scholarships (Arror); school renovations (Nakapelewoi, Kipsaina); internship opportunities	Low – no direct impact linkage	High implementable –	Medium (if CSR budget permits)	Under assessment

Request Category	Example Requests from Table 3.3	Impact Linkage	Feasibility	Priority Level	Decision Status (to be completed)
Health	Health facility upgrades (Arror, Nyaru, Muskut)	Low – no direct impact linkage	Low – county government responsibility	Low (refer to county)	Likely not feasible – refer to County
Youth/social infrastructure	Youth resource centre (Emsea); social hall (Biretwo)	Low – no direct impact linkage	Medium – requires land	Low (if CSR budget permits)	Under assessment
Market/trade	Open air markets (Nyaru); bus stations (multiple)	High – roadside traders directly impacted during construction	High – can be integrated into road design	High	Under assessment
Environmental	Reforestation support (multiple)	High – vegetation loss during construction	High – KeNHA tree planting programme exists	High	Incorporated – see Section 3.2
Access roads	Access roads to institutions (Kimwarer, Emsea)	Medium – some access roads may be affected	Medium – requires separate design	Medium	Under assessment
Administration	Chief's office renovations	None – no impact linkage	Medium – county responsibility	Low	Rejected (no impact linkage, county responsibility)

Table 3-18: CSR Budget and Allocation

Category	Proposed Allocation (% of CSR budget)	Estimated Amount (Ksh) – to be confirmed
Water infrastructure (boreholes, pipelines)	40%	[TBD]
Market/trade facilities (bus stations, markets)	25%	[TBD]
Education (scholarships, targeted renovations)	15%	[TBD]
Environmental (tree planting beyond required)	10%	[TBD]
Access roads (critical connections)	10%	[TBD]
Total CSR Budget	100%	[TBD – separate from SEP budget]

3.9.1 Communication of CSR Decisions

For each CSR request, the project will communicate to the requesting community:

- Decision (approved, partially approved, rejected, referred to county)
- Justification based on the guiding principles above
- If approved: timeline for implementation
- If rejected: alternative pathways (e.g., refer to county government, suggest community self-funding options)

3.10 Summary of Methods, Tools, and Techniques for Engagement

The Stakeholder Engagement Plan envisages that consultation meetings will take place with relevant interested parties prior to the commencement of the Project(s) as well as during the implementation and on an ‘as-needed’ basis. Consultation and engagement activities are required to address stakeholder suggestions, ideas or concerns. Consultations will take place, as much as possible in face-to-face interactions within the affected and beneficiary settlements. The person in charge of stakeholder engagement at the respective implementing agencies will have access to mechanisms under project activities to proactively disseminate information and collect feedback from local communities, organize consultations and ensure the functioning of the project grievance redress mechanism (GRM) at the local level. In addition, stakeholders will be able to use several channels (phones, e-mails and KeNHA’s website) in order to receive more details about the project(s) or provide/receive comments, ideas throughout the project(s) life cycle.

Table 3-19: Stakeholder Engagement Techniques

Engagement method	Stakeholders engaged	Purpose of engagement	Evidence/annex
Entry-level meetings	County Government, NGAO, chiefs, assistant chiefs, village elders, ward/sub-county administrators, community leaders (women groups, Bodaboda chairperson, PWDs representative)	Project introduction, entry protocol, identification of local issues and mobilisation approach	Minutes and attendance logs
KIIs	NLC, NEMA, KWS, KVDA, County departments, security agencies (Kenya Police), technical officers, local administration, women group leaders, Bodaboda chairperson, PWDs’ representative and CBOs/NGOs representative (World Vision, Child Fund)	Technical and institutional consultations on land, environment, wildlife, security, local governance and implementation risks	KII records/attendance log
FGDs	Women, youth, men, vulnerable PAPs, traders, livelihood groups, pastoral/agro-pastoral groups	Discussion of differentiated impacts, gender issues, vulnerability, livelihood risks and inclusion barriers	FGD record/attendance logs
Community barazas	PAPs, local leaders, women, youth, elderly	Project disclosure, collection of concerns,	Minutes and attendance logs

Engagement method	Stakeholders engaged	Purpose of engagement	Evidence/annex
	persons, PWDs, roadside businesses	validation of impacts, GRM awareness	
LRP consultations	Affected households, informal traders, small businesses, farmers, vulnerable PAPs and livelihood groups	Identification of livelihood impacts, restoration options, market/stall opportunities and differentiated assistance	LRP consultation records
Institutional meetings	NLC, NEMA, KWS, KVDA, County Government and relevant national agencies including Kenya Police	Confirmation of institutional roles, permitting, land acquisition, environmental compliance and wildlife issues	Institutional meeting minutes

The stakeholder engagement method will prioritize identified stakeholders based on: interests and expectations in relation to the proposed project; required levels of participation for each stakeholder throughout the project lifecycle; degree of influence of each stakeholder group to the direction and success of the proposed project; interrelationships between different stakeholders and the convergence/divergence between their interests and expectations.

'Interest' measures the degree to which stakeholders are likely to be affected by the project and the degree of interest/concern they have in or about it.

'Power/Influence' refers to the leverage a stakeholder may have in relation to decisions either taken by or affecting the project and the degree to which they can affect project success/failure.

The chart below illustrates the stakeholder communication strategy based on their level of influence/power and interest in relation to the proposed project.

3.11 Stakeholder Analysis

Table 3-20: Stakeholder Analysis

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
Project-affected persons	PAPs affected by land acquisition, loss of structures, crops, trees, businesses or other assets	Public barazas, PAP consultations, ESIA/RAP consultations, disclosure meetings and household surveys	Directly affected by land acquisition, construction footprint, access changes, compensation and livelihood restoration measures	Provide local information on land ownership, asset use, boundaries, access routes, livelihood impacts and preferred mitigation measures; cooperate with verification and RAP implementation	Very high	Low to medium	High – Keep Satisfied Require frequent, direct and detailed engagement throughout RAP preparation, compensation, construction and grievance resolution	Consult directly through household visits, PAP meetings, written notices, local-language explanations, SMS and grievance channels
Severely affected households	Households facing physical displacement, significant economic displacement or loss of substantial assets	RAP consultations, household-level verification, asset inventory and disclosure meetings	May require relocation, compensation, livelihood restoration and transitional support before displacement	Provide detailed household-level information, relocation preferences, livelihood restoration needs and verification of impacts	Very high	Low	High – Keep Satisfied Require intensive individual and household-level engagement, confidentiality and follow-up	Manage closely through individual meetings, household visits, written entitlement information, accessible explanations and direct grievance support
Vulnerable affected persons and households	Older persons, persons with disabilities, female-headed households, widows,	Some engaged through community meetings and FGDs; further targeted engagement required	May face greater difficulty accessing information, participating in consultations, proving claims, relocating,	Identify barriers to participation, communicate specific support needs and help design differentiated assistance measures	High	Low	High –Keep Informed Require targeted, differentiated and supported engagement	Use home visits, small-group meetings, trusted intermediaries, local languages, pictorial/oral explanations, accessible venues, sign-language support

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	orphans, chronically ill persons, very poor households, landless persons, minority clans and households with limited literacy		restoring livelihoods or using grievance mechanisms					where required and confidential communication
General community members along the corridor	Residents of settlements along Biretwo–Arro–Chesongoch, Nyaru–Kapkayo and Kimwarer–Emsea road sections	Public barazas, community meetings, FGDs, surveys and disclosure meetings	May be affected by road works, dust, noise, traffic diversions, community safety risks, employment expectations and access improvements	Provide local knowledge on access, drainage, road safety, cultural sites, water sources, livestock movement, community priorities and construction risks	High	Low to medium	High – Keep informed require regular public engagement and feedback, especially before and during construction	Keep informed through barazas, local administration, notices, radio, SMS, community liaison officers and public information boards
Roadside traders and small businesses	Traders at Nyaru, Biretwo junction, Arro, Chesongoch, Kimwarer, Emsea and other trading centres	Consulted through public meetings; more targeted business consultations required	May face temporary access restrictions, reduced customer access, relocation of stalls, loss of income or construction disruption	Identify business operating patterns, access needs, relocation options and mitigation measures for business continuity	Very high	Low to medium	High – Keep Informed Require direct and site-specific engagement before works affecting trading areas	Engage through trader meetings, business verification, SMS, direct notices, market notices, contractor liaison and grievance channels

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
Farmers and agro-pastoralists	Farmers, irrigation users, livestock keepers and households using land, grazing areas, water points and access routes	Public meetings, FGDs and socio-economic surveys	May be affected by land take, crop loss, drainage changes, irrigation disruption, access restrictions and construction impacts	Provide information on seasonal land use, irrigation furrows, access culverts, livestock routes, drainage hotspots and livelihood impacts	High	Low to medium	High –Keep informed require targeted engagement during design, RAP and construction	Use FGDs, participatory mapping, site walks, local-language meetings, direct notices and coordination with water-user or farmer groups
Pastoralist and livestock-dependent groups	Livestock keepers, herders and communities dependent on grazing areas and livestock movement	Public consultations and community meetings	May be affected by road safety risks, livestock crossing needs, grazing access changes, water access and construction hazards	Identify livestock movement routes, watering points, conflict-sensitive areas and appropriate crossing or safety locations	High	Medium	High – Keep Informed require site-specific and culturally appropriate consultation	Use participatory mapping, elders' meetings, pastoralist FGDs, local-language communication and road-safety awareness
Women and women's groups	Women PAPs, women traders, women farmers, caregivers, women's groups and female community representatives	Women FGDs and public meetings; continued targeted engagement required	Affected by land, livelihoods, access to services, market activities, GBV/SEA/SH risks, household responsibilities and road-safety concerns	Provide gender-specific information on safety, access, markets, livelihoods, service delivery, compensation use and SEA/SH risk mitigation	High	Low to medium	High – Keep Informed Require gender-responsive and safe engagement	Use separate women's FGDs, female facilitators, convenient timing, safe venues, childcare consideration, confidential channels and direct consultation with women in PAP households

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
Youth	Young women and men, youth groups, job seekers, boda boda riders, apprentices and unemployed youth	Youth FGDs and community consultations	Interested in employment, skills, local procurement, road safety, social risks and construction opportunities	Support awareness, road safety, community monitoring and dissemination; provide feedback on employment expectations and social risks	High	Medium to High	Medium to high – Manage Closely Require structured engagement to manage expectations and reduce misinformation	Use youth forums, barazas, SMS, social media where appropriate, contractor notices, transparent recruitment information and grievance channels
Persons with disabilities	Persons with physical, sensory, intellectual or psychosocial disabilities and representative organizations	Limited engagement through general consultations; targeted engagement needed	May be affected by inaccessible meetings, road design, pedestrian safety, relocation, access changes and information barriers	Advise on accessible consultation, road safety, pedestrian facilities, crossings, signage and disability-inclusive mitigation	High	Low to medium	High – Keep Informed Require differentiated and accessible engagement	Use accessible venues, home visits, sign-language interpretation, large print, audio, pictorial materials, support persons and direct engagement through OPDs
Children and school communities	Learners, school heads, teachers, school management committees and parents near the corridor	Community meetings; targeted school consultation required	Affected by road safety risks, traffic diversions, dust, noise and access to schools	Identify school access risks, safe crossing needs, awareness priorities and construction timing concerns	High	Medium	Medium to high – Manage Closely targeted consultation required near schools and during construction	Use school briefings, road-safety campaigns, child-sensitive communication, notices to school management and parent forums
Community leaders and traditional structures	Chiefs, assistant chiefs, village elders, clan	Entry-level meetings, public barazas and	Support mobilization, local coordination, conflict	Mobilize stakeholders, validate local concerns, support dispute resolution, identify vulnerable or	Medium to high	High	High –Manage Closely and Keep Satisfied Engage regularly while ensuring they do not replace direct	Engage through regular briefings, formal letters, coordination meetings and validation of

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	elders, council of elders, religious leaders, peace committees and opinion leaders	mobilization support	prevention, identification of cultural issues and community communication	excluded groups and communicate Project updates			engagement with affected persons	representative legitimacy
National Government Administrative Officers	County Commissioner, Deputy County Commissioners, Assistant County Commissioners, chiefs and assistant chiefs	Consulted during mobilization and public meetings	Support public participation, local coordination, security, conflict management and government service coordination	Mobilize communities, support security-sensitive engagement, coordinate government presence and help resolve local concerns	Medium to high	High	High – Manage Closely through regular coordination, especially before public consultations and construction activities	Manage closely through formal meetings, advance schedules, written updates, coordination forums and incident communication
County political leadership	Governor’s office, MPs, MCAs, ward representatives and other elected leaders	Informed through stakeholder meetings and public forums	Influence public opinion, Project acceptance, local priorities, community expectations and coordination with County structures	Support public communication, manage expectations, promote peaceful participation and align Project benefits with county priorities	Medium to high	High	Medium to high –Keep Satisfied -Strategic engagement while maintaining institutional neutrality	Keep satisfied through formal briefings, progress updates, invitations to public forums and clear non-political Project messaging
County Government departments	Roads, transport, lands, environment, water,	Consulted through institutional meetings and	Provide local planning data, approvals, service coordination,	Provide technical inputs, identify affected public assets, support service restoration, local	High	Medium to high	High –Manage Closely Regular coordination and technical engagement required	Manage closely through county forums, technical workshops, written correspondence,

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	agriculture, livestock, trade, health, education, gender, youth, social services, disaster management and tourism departments	technical consultations	market/trade information, water and health information and support for mitigation	permits, road safety, health, GBV referral and livelihood planning				shared status reports and field verification
National Land Commission	NLC national and county offices	Engaged during RAP/LRP preparation and will continue to be engaged during the statutory land acquisition and valuation process.	Responsible for compulsory acquisition, inquiries, valuation and compensation awards where land acquisition is required	Support lawful acquisition, asset valuation, inquiry hearings, award preparation, compensation coordination and grievance clarification	High	High	High –Manage Closely formal statutory and technical engagement	Manage closely through formal correspondence, acquisition schedules, joint PAP meetings, RAP coordination and statutory notices
NEMA and environmental regulators	National Environment Management Authority and relevant environmental officers	Engaged through ESIA process and regulatory review	Review ESIA, public participation records, ESMP commitments and environmental approvals	Provide regulatory guidance, licence conditions and environmental compliance oversight	High	High	High –Manage Closely Formal coordination and compliance reporting	Manage closely through formal submissions, technical meetings, field inspections and compliance reports
Natural resource and water institutions	WRA, WRUAs, water service providers,	Some consulted through community and	Relevant to water sources, irrigation furrows,	Identify sensitive water resources, advise on culverts, drainage, restoration	Medium to high	Medium to high	High –Manage Closely Technical coordination and site-specific engagement	Manage closely through technical meetings, site visits, participatory mapping

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	irrigation structures, catchment or conservation actors	institutional meetings; targeted engagement required	drainage, erosion, water crossings, abstraction and pollution prevention	and community water-use concerns				and written design feedback
Kenya Wildlife Service and conservation actors	KWS, Rimoi National Reserve management and relevant conservation stakeholders	Engagement required due to wildlife presence and project proximity to Rimoi	Relevant to wildlife movement, elephant presence, human-wildlife conflict, speed control and road-safety measures	Advise on wildlife crossings, signage, speed reduction, community awareness and human-wildlife conflict mitigation	High	High	High – Manage Closely Technical and risk-based engagement	Manage closely through technical meetings, field verification, joint awareness and mitigation planning
Utilities and service providers	KPLC, water utilities, fibre-optic operators, telecommunications companies and other service providers	Information sharing and technical updates	Affected by utility relocation, protection of cables/pipes, service interruptions and shared road corridor use	Provide utility maps, relocation schedules, technical inputs, safety requirements and reinstatement guidance	Medium to high	Medium to high	High –Manage Closely Technical coordination and advance notice required	Manage closely through utility coordination meetings, route plans, email, WhatsApp group, site meetings and relocation schedules
National Government ministries and agencies	National Treasury, Ministry of Roads and Transport, State Department of Roads, NTSA,	Technical updates and high-level engagement	Provide policy direction, financing, safety oversight, labour/OHS oversight and national coordination	Support funding, approvals, policy alignment, safety standards, labour compliance and inter-agency coordination	High	High	High – Manage Closely Strategic and formal engagement at key milestones	Manage closely through formal briefs, progress reports, high-level meetings and compliance updates

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	DOSH and relevant MDAs							
Civil society organizations and NGOs	Human rights groups, GBV/SEA service providers, development NGOs, road-safety groups, environmental NGOs, Kenya Red Cross, World Vision, St. Teresa Mission Centre and local CBOs	Some engaged through disclosure and community consultations; further structured engagement required	May support community outreach, vulnerable-group engagement, monitoring, GBV referral, road safety and grievance referral	Provide independent local knowledge, mobilization support, training, referral services, social accountability and early warning on community concerns	Medium to high	Medium	Medium to high – Keep Satisfied Consult and keep informed, especially where trust or social risks are sensitive	Keep satisfied through status reports, consultation invitations, technical briefings, issue referral and inclusion in community meetings
Community-based organizations and local groups	Women groups, youth groups, farmer groups, savings groups, peace committees, religious groups and local welfare associations	FGDs, community meetings and public consultations	Represent livelihood, gender, youth, peace and local welfare interests	Mobilize members, communicate concerns, support awareness and provide feedback on Project impacts and benefits	Medium to high	Medium	Medium to high – Keep Informed Targeted engagement based on role and affectedness	Keep informed through FGDs, barazas, SMS, local notices and liaison officers

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
Business enterprises and private sector	Local suppliers, quarry/material suppliers, transporters, hotel operators, telecommunication firms, traders and contractors' suppliers	Limited engagement; targeted engagement needed during procurement and construction	Interested in supply opportunities, local procurement, material sourcing, traffic changes and business impacts	Provide materials and services where compliant; share information on business needs, transport routes and supply-chain constraints	High	Medium	Medium – Keep Informed Engage on transparent opportunities and construction impacts	Keep informed through notices, procurement information, contractor briefings, business forums and grievance channels
Contractors and consultants	Design consultants, ESIA/RAP consultants, socio-economic consultants, supervision consultant, civil works contractor and specialist service providers	Consultants engaged; contractors not yet engaged where procurement is pending	Prepare studies, designs, ESIA, RAP, SEP, ESMP; implement construction works and manage construction-stage E&S risks	Provide technical information, implement SEP actions, disclose work schedules, maintain community liaison, manage construction grievances and report performance	High	Medium to high	High –Manage Closely Contractual obligations, technical briefings and performance monitoring	Manage closely through contract requirements, E&S meetings, monthly reports, supervision, corrective-action notices and community liaison
Workers and worker representatives	Direct workers, contracted workers, workers' representatives, suppliers and	Not yet engaged fully; to be engaged during contractor mobilization	Involved in construction, camp operations, traffic management, material sites and site activities	Comply with codes of conduct, OHS, SEA/SH prevention, labour standards and worker grievance procedures	High	Medium to Low	High Keep Informed and Keep Satisfied during construction – separate worker engagement required under OS2 and labour management procedures	Keep informed through induction, toolbox talks, worker GRM, notice boards, training and confidential reporting channels

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	subcontractor workers							
Local health facilities and service providers	Dispensaries, health centres, hospitals, community health promoters, HIV/AIDS service providers and GBV referral services	Consulted generally through community and institutional meetings; targeted engagement required	Affected by improved access, possible pressure from labour influx, emergency response needs, HIV/AIDS and SEA/SH referral	Support health awareness, emergency referral, HIV/AIDS sensitization, GBV referral pathways and community health monitoring	Medium to high	Medium	Medium to high – Keep Informed Targeted engagement during construction	Keep informed through health-sector meetings, referral mapping, awareness campaigns and emergency communication
Security and peace actors	National Police Service, local security committees, peace committees, NGAO and community peace structures	Engaged through local administration; further conflict-sensitive engagement required	Relevant to road security, conflict-sensitive engagement, worker-community relations, public meetings and incident response	Provide security advice, support safe engagement, manage conflict risks and prevent escalation of grievances	Medium to high	High	High – Manage Closely Especially in security-sensitive areas	Manage closely through coordination meetings, incident protocols and do-no-harm engagement
Cultural heritage custodians	Elders, religious leaders, families associated with graves, custodians of sacred sites, cultural	Some issues raised in consultations, including graves and culturally sensitive areas	May be affected by road alignment, exhumation/reburial, chance finds, sacred trees, medicinal trees or cultural landscapes	Identify cultural sites, advise on rituals, chance finds, avoidance measures and culturally appropriate procedures	High	Medium to high locally	High -Manage Closely Where cultural heritage is affected	Manage closely through confidential/site-specific meetings, elders' forums, cultural protocols and direct engagement with affected families

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
	practitioners and local historians							
Media	Local, regional and national media houses, radio stations and digital media	Limited engagement; to be engaged for public information	Disseminate Project information, progress updates, notices and road-safety messages	Support accurate public communication and reduce misinformation	Medium	Medium to high	Medium – Keep Satisfied Strategic public communication required	Keep satisfied through verified press releases, media briefings, radio messages and designated spokespersons
Academic and research institutions	Universities, TVET institutions and research organizations	Not yet engaged in detail	May support training, skills development, research, environmental monitoring and youth capacity building	Provide technical knowledge, training opportunities and research support on road safety, environment and livelihoods	Medium	Low to medium	Low to medium –Keep Informed Technical consultation and knowledge sharing where relevant	Keep informed through technical workshops, formal letters and collaboration opportunities
Road users and transport operators	Matatu operators, boda boda riders, truck drivers, cyclists, pedestrians, commuters, livestock transporters and general road users	General public meetings; targeted engagement required during design and construction	Affected by diversions, traffic controls, road safety, travel time, access and construction delays	Provide information on road safety hotspots, transport patterns, diversion needs and user priorities	Medium to high	Low to medium	Medium – Keep Informed Broad disclosure and targeted consultation on road safety and traffic management	Keep informed through road-safety meetings, notices, radio, signage, SMS and transport-stage consultations
Development partner and financier	African Development Bank	Financing and safeguard oversight	Reviews SEP, ESIA, RAP, ESMP, GRM,	Provide safeguard guidance, review documents, supervise	High	High	High – Manage closely	Manage closely through formal submissions, progress

	Specific groups/entities	Current engagement	How they are involved in the project activities	How the stakeholder could contribute to the project	Typical level of interest	Typical level of influence	Level of engagement required	Communication needs
			vulnerable-group measures and E&S compliance	implementation and agree corrective actions			Formal reporting and implementation-support engagement	reports, mission meetings, action trackers and disclosure compliance
General public	Wider public, road users, neighbouring communities and persons indirectly interested in the Project	Limited direct engagement beyond public participation	Interested in Project benefits, connectivity, public safety, employment, environmental management and government accountability	Provide feedback, raise concerns and support Project accountability	Low to medium	Low	Low to medium – Monitor Broad disclosure and periodic communication	Monitor and keep informed through websites, radio, notices, public summaries and grievance channels

3.12 Notes for Application

1. Stakeholder identification will remain iterative. New stakeholders identified during detailed design, RAP implementation, contractor mobilization, material-site selection, utility relocation or construction will be added to the stakeholder register.
2. Engagement through community leaders, political leaders or other representatives will support, but will not replace, direct engagement with PAPs, vulnerable groups and persons whose land, livelihoods, access, safety or entitlements may be affected.
3. Vulnerable and disadvantaged groups will receive differentiated engagement measures, including accessible venues, local-language communication, confidential consultations, home visits and tailored support where required.
4. The level of engagement will be reviewed periodically based on Project risks, grievances, stakeholder interest, vulnerability, implementation stage and the effectiveness of previous engagement.
5. The Project will maintain records of stakeholder engagement, issues raised, responses provided, commitments made and follow-up actions.

Communication strategy based on the stakeholder power/ interest matrix

 Increasing level of interest	Some interest to significant interest	✓ Treat fairly, honor commitments made to these stakeholders, and principally endeavor to keep them satisfied insofar as balance of costs and benefits allow	✓ Strategic threat or opportunity - invest in engagement processes to understand concerns and develop solutions. Engage closely, develop strong relationship and influence actively
	No interest to little interest	✓ Low priority - provide access to general channels of information and feedback and monitor regularly	✓ Keep involved and informed, but ensure balance between the concerns of high influence stakeholders and those of people actually impacted by decisions
		No influence/power to little influence/power	Some influence/power to significant influence/power
	 Increasing level of influence/power		

Power/Interest Rating Colour Scale



Very Low

Low

Moderate

Scale for Categorizing Influence/Power and Level of Interest



High

Category	1-2	3-4	5-7	8-10
Influence/Power	Very Low	Low	Moderate	High
Level of Interest	Very Low	Low	Moderate	High

Detailed record of all public consultations will be kept in the office. Whenever possible, minutes should be supported with photos taken during consultations and signed lists of attendees with their contact information and where possible personal identification numbers. Engagement with stakeholders will continue during the construction phase, and records of environmental and social issues raised, resettlement/livelihood restoration activities, complaints received during consultations, field visits, informal discussions, formal letters, etc., will be followed up. The project will ensure that the different activities for stakeholder engagement, including information disclosure, are inclusive and culturally sensitive. Measures will also be taken to ensure that the vulnerable groups have the chance to participate and benefit from project activities. Community consultations should be well documented and kept in the project(s) site office and the local administration office for reference. Where consultations are done through local administrations, basic guidelines and reporting formats should be provided by implementing agencies.

Table 3-21: The envisaged engagement processes, methods, including sequencing, topics of consultations and target stakeholders.

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
National Regulatory Bodies and Government Agencies	- Ministry of Transport & Infrastructure	- Enhanced connectivity - Improved transportation	9	9	Throughout the project lifetime	- Official Letters - One on one meetings - Contractual Agreements
	- Kenya National Highways Authority (KeNHA)	- The contracting Authority for the project - In charge of national trunk roads i.e., Class A & B roads	8	6	Throughout the project lifetime	- Official Letters - One on one meetings - Workshops
	- National Environment Management Authority (NEMA)	- Issues environmental-related permits (EIA License) and monitors compliance of operations - Inspects and monitors impact of the project on the environment - Grants or withdraws permits (such as EIA license, Effluent Discharge License) - Impose measures (Improvement Orders) to fulfil legal obligations	8	6	Throughout the project lifetime	- Environmental and Social Impact Assessment Report - Annual Environmental Audits
	- Directorate of Occupational Safety and Health Services (DOSHS)	- Issue Workplace Registration certificate to the EPC Company - Registers the upgrade works site as 'construction site'	7	4	Throughout the project lifetime	- Annual OSH Audits - Official Letters - Workshop

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
	- National Transport and Safety Authority	- Development and implementation of Road safety strategies	6	4	Throughout the project lifetime	- Traffic Management Plans - Official Letters - Technical meetings - Workshop
	- National Land Commission	- Land acquisition and resettlement planning - Manage public land on behalf of the national and county Governments. - Initiate investigations in the event of land injustice and recommend appropriate redress. - Monitor land use planning	6	4	Pre-Construction Phase	- Official Letters - Technical Meetings - RAP Study
	- Kenya National Police Service	- Traffic Management Plan - Enforcement of traffic laws and regulations - Enforcement of general security	7	4	Throughout the project lifetime	- Traffic Management Plans
	- National Museums of Kenya	- Conservation of the natural environment - Interest in the conservation of archeological and cultural heritage sites (such as Rimoi National Reserve)	3	5	Pre-Construction Phase	- Consultation Meetings - Development of Chance Find Procedures
	- Water Resources Authority	- Confirm riparian boundaries & water abstraction conditions - Compliance with the Water Act - Buffer for major rivers within the project area	7	5	Throughout the lifetime of the project	- Application for abstraction permits - Follow up approval of permits

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
	- National Drought Management Authority (NDMA)	- Integration of drought/climate risk in the project	4	6	Pre-construction phase	- Official Letters - Consultation meetings -
Ministry of Interior and Coordination of National Government (National Government Administrative Officers)	- County Commissioner (Elgeyo Marakwet) - Deputy County Commissioner (Kerio Valley, Keiyo South and Keiyo North) - Assistant County Commissioner - Area Chiefs for the affected locations - Assistant Chiefs for the affected sub-locations - Council of Elders /Opinion Leaders from various settlements within the project area	- Are Representatives of local communities that fall within their jurisdiction. - Concerned with community development and participation. - Facilitate community mobilization for engagement - Make security arrangements for project teams during fieldwork	3	5	Pre-construction and construction phases	- Official Letters - Tele conversations - Consultation Meetings - Key Informant Interviews (KIIs) - Scheduled Public Barazas/ community meetings
County Government of Elgeyo Marakwet	- Ministry of Roads, Transport and Public Works	- Liaison with National Agencies (KeNHA) in planning and design of transport systems - Road design to enhance the efficient transportation of people and goods. - Ensures integration with county roads and feeder networks - Promotes road safety near settlements, markets, and schools	7	8	Pre-construction and construction phases	- Official letters - One-on-one meetings - KIIs - Design approvals - Workshop

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
		- Protect existing and planned county infrastructure				
	Ministry of Tourism, Culture, Natural Resources & Climate Change	- Manages natural resources and environmental conservation - Protect wildlife habitats and sensitive ecosystems - Safeguard cultural and archaeological heritage sites - Oversee vegetation conservation and land restoration - Promote climate-resilient infrastructure planning	4	5	Pre-construction and construction phases	- Emails - Official letters - One on one meetings - KIIs - Workshop
	Ministry of Lands, Physical Planning and Urban Areas	- Oversee land administration and tenure matters - Manage wayleave acquisition and compensation processes - Align the project with county spatial and urban plans - Address settlement and structure impacts - Prevent unplanned ribbon development along the highway	7	8	Pre-construction phase	- Official letters - One-on-one meetings - KIIs - Design approvals - Workshop
	Ministry of Health and Sanitation	- Compliance with the Public Health Act - Sanitary requirements for the workers	5	5	Pre-construction and construction phases	- Official letters - Key Informant Interviews - Workshop - Worker Ergonomic Reports - EHS audit reports

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
		- Welfare of labour force (medical conditions, ergonomics, etc) - Monitor communicable disease risk from labour influx				
	Ministry of Education, Sports & Social Protection	- Social protection programs for vulnerable groups, i.e., children, the disabled, the elderly, and minorities - School safety near the road corridor	4	3	Pre-construction Phase	- Official letters - KIIs - One-on-one meetings - Workshop
	Ministry of Agriculture, Livestock Development & Fisheries Kerio Valley Development Authority	- Protection of pastoral livelihoods, rangeland systems, and fish value chains - Improved market access	5	5		- Official letters - KIIs - One-on-one meetings - Workshop
	Ministry of Trade, Gender, and Youth Affairs	- Local economic inclusion and social equity - Enterprise development and promotion of trade - Addresses GBV risks linked to labor influx - Supports skills development and livelihood opportunities	5	8		- Official letters - KIIs - One-on-one meetings - Workshop
	County Governor, Members of the County Assembly (MCAs):	- Represent the people in development matters (views/opinions/proposals) - Interested in the economic improvement of their areas of jurisdiction - Get political Mileage	7	5	Throughout the project lifetime	- Official Letters - Public Baraza Meetings - One on one meetings

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
Politicians	The Governor, Member of Parliament	- Get political Mileage - Economic improvement of their areas of jurisdiction	6	7	Pre-construction, Construction, and Operation Phases	- One-on-One Meetings - Workshops
- Contractors & Sub-Contractors	• TBD	- In charge of the design of the proposed toll optimization and upgrade works. - Cooperation with Govt. agencies and all other stakeholders - Compliance with the Kenya's construction and E&S laws and regulations - Successful completion of the project	7	9	Throughout the project lifetime	- One on one meetings - Official Letters - Formal Meetings
Utility Service providers (ICT, Water and Sanitation, electricity etc.	- Kenya Power - ICT service providers	- Relocation of their utilities from the proposed project upgrade ROW	4	6	Pre-construction, Construction	- Emails - Focus Group Discussions (FGDs) - KIIs
Affected Communities	Men, women, youth, community representatives) Vulnerable groups e.g. - the elderly, disabled, women/widows, children/orphans, etc.	- Available job and business opportunities - First priority for locals in employment - Gender considerations in labour recruitment - General impact of the project on the community and its environment - Economic improvement of the area	8	9	Throughout the project lifetime	- Official Letters - Phone - One on One Meetings - Formal Meetings - Media Announcements

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
		- Beneficiaries of CSR programs - Project Grievance Mechanism				
Business Community	- Business owners/operators/traders operating close to the road	- Information sharing on the anticipated impacts on their businesses and timelines/duration for planning purposes. - Available opportunities for business	6	8	Preconstruction and construction phases	- FGDs - Public Barazas - Surveys and questionnaires
Affected Institutions (Workplaces, schools, churches, health centers, etc.	- Members who use or access land and resources in the project area - The general public in the areas of influence	- Information sharing on the impact of the project to the community and its environs. - The local population will be interested in the available job opportunities related to the project.	3	6	Throughout the project lifetime	- Public Posters - FGDs/KIIs - Public Meetings/Barazas - Media announcements - Surveys and questionnaires - Project website (with information about the proposed additional works, including project updates, meeting schedules, and a way for stakeholders to provide feedback).
Road Users/Transporters	- Motorists (both private, public, and/or commercial) who commute on the road	- Give feedback on their road user experience. - Give recommendations on how to improve the road's efficiency and road-user experience	8	8	Throughout the project lifetime	- Public Posters - FGDs - BID - Formal public meetings - Media announcements

Stakeholder Group	Stakeholders	Area of interest	Influence/Power	Level of Interest	Periods of Active Engagement	Method of communication
						- Surveys and questionnaires
CSOs/NGOs that have an interest in the project - Have direct interest in the proposed activities' social and environmental aspects and that are able to influence the proposed activities directly or through public opinion. - May also have useful data and insight that could be incorporated in the design stage to minimize project impacts	- Clan leaders - World Vision - Kenya Redcross -	- Insights on pastoralist livelihoods, grazing patterns, and livestock migration routes that may be affected by the road; - Help identify potential risks of conflict over land, water, and pasture during construction; - Provide data on existing community resilience programs, especially those funded by donors; - Collaborate on mitigation measures to safeguard pastoralist interests. - Leverage clan networks to mobilize pastoralist communities for meaningful participation	4	9	Pre-construction and construction phases	- Emails - Official letters - Formal meetings - Workshops - Website
	- Churches in the project areas such as the Catholic and AIC churches that support the community initiatives.	- Understand potential social impacts on vulnerable groups supported by the church; - Assess risks of inter-community tensions during construction	3	4		- Emails - Official letters - Formal meetings - Workshops - Website

4 CHAPTER FOUR: INFORMATION DISCLOSURE REQUIREMENTS

4.1 Introduction

The project strategies for information disclosure will be tailored to the different stakeholders at the national and county levels. Strategies to be employed will include public barazas, meetings, Focus Group Discussions (FGDs), Key Informant Interviews (KII) where possible, traditional channels of communications such as radios and public announcements will be implemented. Other strategies will include one-on-one interviews through phones for community representatives and other interests' groups. Appropriate formats and methods of disclosure and information sharing will be used. A central/national depository of all disclosed information will be maintained with the project implementing agency website.

Other means of communication including print media, local radio, television, public events, brochures fliers, social media, etc., will also be used. In addition, information disclosure (including any safeguards documents) will be available at all local administration offices.

Table 4- 1: Information disclosure Matrix

Document / Information to be Disclosed	Timing of Disclosure	Language(s)	Format / Channel	Location of Disclosure	Responsible Party
Project Overview (scope, objectives, alignment)	ESIA phase (scoping & draft disclosure)	English, Kiswahili, local language (e.g., Marakwet/Keiyo)	Barazas, brochures, posters, presentations	Chief's camps, community centers, trading centers	KeNHA, ESIA Team, CLO
Potential Environmental & Social Impacts and Mitigation Measures (ESIA/ESMP summary)	ESIA disclosure stage; prior to approval	English, Kiswahili, local language	Barazas, summary leaflets, posters	Public meeting venues, County offices	KeNHA, ESIA Team
Resettlement Action Plan (RAP) & Land Acquisition Implications	Pre-construction (before compensation)	English, Kiswahili, local language	RAP barazas, printed summaries, one-on-one meetings	Affected villages, Chief's offices	KeNHA, NLC, RAP Team, County Land Registrar
PAP Lists and Asset Registers	Pre-construction (verification stage)	Local language, Kiswahili	Public display, verification meetings	Local administration offices, community notice boards	RAP Team, CLO, LGRCs,
Construction Schedule and Planned Activities	Before and during construction	Kiswahili, local language	Barazas, notice boards, posters	Project corridor settlements, contractor camps	Contractor, CLO, Consultant
Employment Opportunities and Recruitment Procedures	Pre-construction and during construction	Kiswahili, local language	Public notices, barazas, notice boards	Chief's camps, trading centers, contractor offices	Contractor, CLO, Local Administration
Traffic Management Plan (road diversions, safety measures)	Before and during construction	Kiswahili, local language	Road signage, posters, barazas, radio announcements	Along the road corridor, schools, trading centers	Contractor, Supervising Engineer
Community Health & Safety Information (dust, noise, safety)	Construction phase (continuous)	Kiswahili, local language	Awareness campaigns, barazas, posters	Schools, health centers, villages	Contractor, CLO, Health Officers
GBV/SEA Awareness and Reporting Mechanisms	Pre-construction and during construction	Kiswahili, local language	FGDs, sensitization forums, posters	Community centers, health facilities	Contractor, CLO, GBV Service Providers
Grievance Redress Mechanism (GRM) Procedures & Contacts	ESIA phase and continuous throughout project	Kiswahili, local language	Barazas, posters, brochures, hotline contacts	Chief's offices, notice boards, LGRC offices	CLO, LGRCs, KeNHA
Project Progress Updates and Feedback Reports	Construction phase (monthly/quarterly)	Kiswahili, local language	Barazas, meetings, notice boards	Community centers, local administration offices	CLO, Contractor, KeNHA
Environmental Monitoring Results (where relevant)	Construction and operation phases (periodic)	English (technical), Kiswahili/local (summary)	Reports, summary briefs, meetings	County offices, community forums	Supervising Engineer, Environmental Specialist

4.2 Documentation Procedures

All stakeholder engagement activities will be appropriately recorded and maintained in a stakeholder engagement database or register. Documentation will include the following;

- Date, location, and type of engagement activity.
- Names and categories of participants, disaggregated by gender and vulnerable group status where appropriate.
- Key issues, concerns, suggestions, and expectations raised by stakeholders.
- Responses provided during consultations.
- Agreed actions, responsibilities, and timelines for follow-up.
- Attendance registers, meeting minutes, photographs, and consultation materials, where applicable.

5 CHAPTER FIVE: VULNERABLE GROUPS AND INCLUSION

5.1 Introduction

Vulnerable and disadvantaged persons or groups are those who may be disproportionately affected by the proposed Biretwo–Arror–Chesongoch Road and associated spur roads, or who may face barriers to accessing Project information, consultation, compensation, livelihood restoration, Project benefits or grievance mechanisms. Potentially, vulnerable groups include persons with disabilities, older persons without adequate support, widows and female-headed households, child-headed households, chronically ill persons, very poor households, informal occupants, landless persons, roadside traders, pastoral and agro-pastoral households, unemployed youth, minority clans, persons with limited literacy, remote communities and persons affected by insecurity or social exclusion.

Determination of level of vulnerability for the proposed Biretwo–Arror–Chesongoch Road is not only based on actual household circumstances but also the nature and severity of project impacts rather than demographic status alone. The vulnerability assessment has considered poverty, household composition, disability, health, tenure security, livelihood dependence, geographic isolation, literacy, gender barriers, access to support and capacity to recover from displacement or disruption.

In compliance with AfDB Integrated Safeguards System (ISS), particularly OS1 and OS7 (Environmental and Social Assessment), the project recognizes the need to be deliberate and ensure that vulnerable and marginalized groups (VMGs) are effectively included in stakeholder engagement processes and thereby reduce on barriers these groups often face in projects. This section outlines the identification of vulnerable groups, the barriers they face, and the practical measures that will be implemented to ensure their meaningful inclusion throughout the project lifecycle.

For purposes of this SEP, vulnerability is understood as both identity-based and risk-based. It is not limited to the presence of historically marginalised or indigenous communities. Vulnerability may also arise from a person's or community's exposure to environmental, social, economic, security or climate-related risks that reduce their ability to participate in, benefit from, or cope with project impacts. Along the project corridor, vulnerability is influenced by factors such as gender, age, disability, poverty, livelihood dependence, displacement history, limited access to services, minority or clan status, exposure to landslides and climate-related hazards, and insecurity associated with cattle rustling and banditry. The SEP therefore provides for vulnerability mapping, inclusive and culturally appropriate engagement, differentiated consultation methods, accessible disclosure, targeted follow-up and additional support for groups at heightened risk of exclusion or adverse project impacts.

5.2 Identification of Vulnerable and Marginalized Groups

The project area is predominantly inhabited by ethnic minorities and vulnerable groups, with the project area mainly being home to the Marakwet and Keiyo's community. The Marakwet people are often recognized by the Kenyan government as minorities and marginalized communities as they have historically experienced, and continue to experience aspects of socio-economic, political marginalization, security issues such as banditry, clan conflicts and poor infrastructure.

Disadvantaged/Vulnerable groups within the communities affected by the project will be further confirmed and consulted through dedicated means, as appropriate. A description of the different categories of vulnerable groups identified during the consultation process are as below;

- a. **Women and women-headed households:** Women who may face gender-specific impacts, limited access to decision-making processes, or increased risks related to gender-based violence during construction.
- b. **Youth:** Young people who may lack representation in traditional decision-making structures but have significant stakes in employment opportunities and long-term project benefits.
- c. **Elderly persons:** Older community members who may have mobility limitations, health vulnerabilities, or difficulties accessing information and engagement activities.
- d. **Persons with disabilities:** Individuals with physical, sensory, or cognitive disabilities who may face accessibility barriers to engagement activities and increased vulnerability to project impacts.
- e. **Pastoralist and nomadic communities:** Mobile populations whose traditional grazing routes, water access points, and seasonal migration patterns may be affected by the project.
- f. **Minority clans and ethnic groups:** Communities that may be underrepresented in local governance structures or face marginalization in consultation processes
- g. **Poor and economically disadvantaged households:** Families living below the poverty line who have limited resources to cope with temporary disruptions and may require targeted assistance.
- h. **Illiterate and low-literacy populations:** Community members who cannot read written materials and require alternative communication methods such as verbal briefings, visual aids, or radio announcements.
- i. **Internally displaced persons (IDPs) or returnees:** Reported to be present in the project area, these groups may have precarious land tenure and limited integration into local community structures.
- j. **Small scale roadside traders:** They may be left out of traders' engagement as some may not be members of an organized group at local level.

5.3 Key Barriers to Inclusion

The following barriers were identified during stakeholder consultations:

- Cultural norms limiting participation of women and youth in public forums
- Low literacy levels affecting understanding of project information
- Language barriers (use of technical or non-local language)
- Mobility challenges (distance to meeting venues, disability, age)
- Economic constraints limiting participation
- Fear of speaking openly in large or mixed gatherings
- Security concerns in certain areas affecting attendance

Table 5- 1: Engagement Methods to Be Undertaken for VMGs

Barrier / Issue	Inclusion Measure (What to Do)	How to Implement	Responsible
Low participation of women in public meetings	Conduct separate women-only FGDs	Schedule at convenient times (mid-morning/afternoon), use female facilitators, safe and accessible venues	CLO, Social Specialist

Cultural norms limiting women/youth voice	Use small group discussions instead of large barazas	Break meetings into smaller groups where participants feel comfortable speaking	ESIA Team, CLO
Language barriers (local dialects)	Use local interpreters and translate materials	Engage local facilitators; avoid technical jargon; use storytelling/analogies	CLO, Local Administration
Low literacy levels	Use visual communication tools	Posters with images, diagrams, community theatre, demonstrations instead of text-heavy materials	CLO, Contractor
Limited mobility (elderly, PWDs)	Conduct door-to-door or household-level consultations	Target vulnerable households during PAP census and follow-ups	CLO, RAP Team
Exclusion from decision-making structures	Ensure representation in LGRCs and committees	Set quotas (e.g., at least 30–50% women, inclusion of youth/PWDs)	KeNHA, Local Administration
Economic vulnerability	Prioritize livelihood restoration support	Tailor programs (e.g., small-scale irrigation support, micro-enterprises for women/youth)	KeNHA, Livelihood Specialist
Risk of GBV/SEA	Establish confidential and accessible reporting channels	Provide female focal persons, link to local health/GBV services, discreet reporting mechanisms	CLO, Contractor
Information not reaching vulnerable groups	Use multiple communication channels	Combine barazas with local radio, churches, chiefs' meetings, and informal networks	CLO
Timing conflicts (household chores, farming)	Schedule meetings at flexible and appropriate times	Avoid early morning/late evening; consult communities on preferred timing	CLO
Youth exclusion despite high expectations	Create youth-specific engagement forums	Hold youth barazas/FGDs; clearly communicate employment processes	Contractor, CLO
Elite capture (leaders dominating engagement)	Use mixed consultation approaches	Combine leader engagement with FGDs and random household outreach	ESIA Team, CLO
Stigma or fear in raising grievances	Strengthen anonymous grievance channels	Suggestion boxes, hotline numbers, trusted LGRC members	CLO, LGRCs
Distance from meeting venues (remote settlements)	Decentralize engagement	Hold meetings in multiple villages instead of one central location	CLO, Local Administration

The proposed road project is committed to ensuring that vulnerable and marginalized groups are not excluded from stakeholder engagement processes. Through targeted, practical, and culturally appropriate measures, the project will promote inclusive participation, equitable access to benefits, and effective grievance management in line with AfDB safeguard requirements.

Monitoring and Evaluation of Inclusion will be monitored using the following indicators:

- Number and percentage of women, youth, and vulnerable groups participating in consultations
- Representation of vulnerable groups in LGRCs and Project committees
- Number of grievances submitted by vulnerable groups and resolved
- Level of stakeholder satisfaction among vulnerable groups
- Evidence of integration of VMG concerns into project decisions

Table 5- 2: Vulnerable and Disadvantaged Groups, Potential Impacts and Engagement Barriers

Project activity or impact area	Potential vulnerable or disadvantaged persons and groups	Potential Project impacts and barriers to participation or benefits	Required differentiated engagement and support measures
Road design, alignment selection and widening	Poor households, informal occupants, tenants, landless persons, female-headed households, persons with limited literacy and households without formal land documentation	May not understand design drawings or proposed boundaries; may be excluded where consultation relies on registered landowners or community leaders; may lack documentary evidence of land or asset interests	Direct household consultation; simplified maps and visual materials; oral explanation in local languages; participatory mapping; inclusion of tenants, informal users, spouses and secondary rights holders
Land acquisition and physical displacement	Severely affected households, older persons, persons with disabilities, widows, child-headed households, chronically ill persons and households without social support	Greater difficulty securing replacement housing, moving possessions, accessing compensation or re-establishing social networks; risk of displacement before adequate assistance	Individual case assessment; household visits; relocation assistance; transport and mobility support; accessible replacement housing; transitional support; participation of trusted support persons; follow-up after relocation
Economic displacement and livelihood disruption	Roadside traders, informal vendors, small farmers, irrigation users, pastoralists, low-income households, women traders and persons dependent on daily income	Loss of customers, farmland, grazing access, irrigation, trading space or income; inability to absorb even short interruptions; possible exclusion from compensation where activities are informal	Business and livelihood census; direct consultation; advance notice; livelihood-restoration planning; temporary trading or access arrangements; assistance to restore income; flexible scheduling of works
Impacts on pastoral and agro-pastoral livelihoods	Herders, livestock owners, seasonal livestock movers, poor pastoral households, women and children responsible for livestock care	Restricted access to grazing land, livestock routes and water points; road-safety risks; meetings may conflict with seasonal movements or herding responsibilities	Participatory mapping of livestock routes and water points; consultation timed around herding schedules; engagement with herders as well as livestock owners; provision of safe livestock crossings and access arrangements
Impacts on farming and irrigation systems	Smallholder farmers, women farmers, tenant farmers, agricultural labourers and irrigation users	Loss of productive land, crops, irrigation furrows or farm access; low-income farmers may have	Farm-level consultation; seasonal scheduling; direct notice before disruption; participatory

Project activity or impact area	Potential vulnerable or disadvantaged persons and groups	Potential Project impacts and barriers to participation or benefits	Required differentiated engagement and support measures
		limited capacity to restore production; consultation may occur during peak farming periods	identification of culverts and irrigation crossings; livelihood-restoration support and verification of reinstatement
Construction-related access restrictions	Persons with disabilities, older persons, schoolchildren, patients, caregivers, small businesses and households dependent on public transport	Temporary loss of access to homes, farms, businesses, schools or health facilities; increased travel distance or unsafe diversions	Advance direct notice; accessible temporary routes; footbridges or safe crossings; household-level access planning; consultation with schools and health facilities; rapid response to access complaints
Road safety and increased traffic	Children, older persons, persons with disabilities, pedestrians, cyclists, boda boda users, livestock keepers and communities near schools or trading centres	Increased risk of accidents and difficulty crossing the upgraded road; inaccessible road-safety information; livestock–vehicle collisions	Targeted road-safety consultation; child-sensitive materials; accessible crossings; speed-calming measures; livestock crossings; local-language awareness campaigns; engagement with schools and transport groups
Labour influx and worker-community interaction	Women, girls, children, poor households, persons with disabilities, unemployed youth and socially marginalized persons	Increased exposure to GBV/SEA/SH, exploitation, child abuse, communicable diseases, social tension and unequal access to opportunities	Separate and safe consultations; confidential reporting channels; SEA/SH referral pathways; child-protection measures; worker codes of conduct; community awareness; transparent recruitment information
Local employment and procurement	Unemployed youth, women, persons with disabilities, low-literacy applicants, local suppliers and economically marginalized households	May lack information, documentation, skills or confidence to apply; risk of elite capture, political interference or unrealistic expectations, risk of GBV/SEA/SH	Clear recruitment and procurement criteria; multiple information channels; accessible application processes; targeted briefings; skills information; grievance channels; communication that engagement does not guarantee employment
Borrow pits, quarries, camps and haul routes	Neighbouring poor households, pastoralists, farmers, children,	Dust, noise, water contamination, safety risks, loss of access and exposure to open excavations;	Site-specific stakeholder identification; direct neighbour consultation; fencing and safety

Project activity or impact area	Potential vulnerable or disadvantaged persons and groups	Potential Project impacts and barriers to participation or benefits	Required differentiated engagement and support measures
	women, persons with disabilities and users of communal resources	contractor-selected sites may be identified after the SEP is prepared	information; consultation on access and restoration; monitoring and grievance follow-up
Water sources and natural-resource impacts	Poor households, pastoralists, farmers, women and children responsible for water collection, downstream users and irrigation groups	Reduced access to water, contamination, longer collection distances or disruption of irrigation; users may lack formal representation	Participatory mapping; separate engagement with women and secondary water users; consultation with WRUAs and affected households; advance notice; alternative access and restoration measures
Cultural heritage and burial sites	Affected families, elders, minority clans, religious groups, custodians of graves, traditional healers and users of medicinal trees	Cultural harm, emotional distress, exclusion of legitimate custodians or disclosure of sensitive information; public consultation may be inappropriate	Confidential family and custodian consultations; culturally appropriate decision-making; adequate time for customary processes; support for agreed ceremonies and relocation; restricted disclosure of sensitive locations
Wildlife movement and human-wildlife interaction	Communities near Rimoi National Reserve, livestock keepers, poor households and persons travelling on foot	Increased collision risk, crop or livestock losses and heightened human-wildlife conflict; some affected households may lack access to formal reporting systems	Targeted consultation with affected settlements; local-language safety information; engagement with KWS; accessible incident reporting; identification of wildlife crossings and warning measures
Grievance management	Persons with limited literacy, women, persons with disabilities, informal occupants, minority clans, remote households and persons fearing retaliation	May not know how to submit a grievance; may fear leaders, employers or Project personnel; written or digital channels may be inaccessible, risk of GBV/SEA/SH	Multiple free channels; oral and anonymous complaints; confidential submission; accessible grievance desks; support persons; non-retaliation assurances; local-language communication and direct feedback
Public meetings and information disclosure	Women with care responsibilities, persons with disabilities, older	Inaccessible venues, inconvenient timing, dominance by leaders or	Accessible venues and sanitation; flexible timing; separate small-group

Project activity or impact area	Potential vulnerable or disadvantaged persons and groups	Potential Project impacts and barriers to participation or benefits	Required differentiated engagement and support measures
	persons, low-literacy groups, remote communities, herders and informal workers	men, language barriers, limited transport, cultural norms limiting women/youth voice and inability to read documents	meetings; local-language interpretation; oral, audio and pictorial materials; transport assistance; home visits and mobile teams
Conflict and security-sensitive engagement	Minority clans, displaced or conflict-affected households, women, youth and persons who fear reprisals	Fear of speaking openly, exclusion from meetings, intimidation, politicization or retaliation for expressing concerns	Conflict-sensitive stakeholder mapping; neutral and safe venues; confidential consultation; separate meetings where necessary; non-retaliation measures; independent facilitation where trust is low
Digital and remote communication	Persons without mobile phones, internet access, electricity or digital literacy; older persons; persons with visual or cognitive disabilities	Exclusion where Project information is shared primarily through WhatsApp, websites, email or SMS	Combine digital and non-digital communication; radio, barazas, notices, household visits and local focal persons; accessible electronic formats where digital communication is used
Operation and maintenance of the road	Pedestrians, persons with disabilities, poor households, schoolchildren, livestock keepers and informal roadside enterprises	Continuing road-safety risks, inaccessible crossings, possible roadside-control measures and limited channels for reporting maintenance concerns	Periodic accessible road-safety engagement; community feedback forums; accessible reporting channels; monitoring of crossings, access and high-risk locations

Where vulnerability affects a person's ability to participate in compensation, relocation or livelihood-restoration processes, additional assistance may include help with documentation, transport, banking arrangements, financial literacy, relocation, replacement housing, livelihood restoration and post-relocation follow-up. Such assistance will supplement, and will not replace, compensation and entitlements due to the affected person.

5.4 Gender and Disability Inclusion

The project will ensure that women are continuously consulted directly on land, livelihoods, compensation, safety, employment and GBV/SEA/SH risks. Measures may include separate meetings, female facilitators, safe venues, suitable timing and confidential reporting channels. Persons with disabilities will be consulted directly and provided with reasonable accommodation, including accessible venues, sign-language interpretation, audio or large-print materials, mobility assistance, support persons and accessible grievance channels.

The Project will not assume that one representative or organization can speak for all women, persons with disabilities or vulnerable groups.

5.5 Remote, Pastoral and Mobile Communities

Engagement with remote, pastoral and seasonally mobile groups may involve mobile consultation teams, meetings at livestock markets or water points, local radio, participatory mapping, local focal persons and repeat visits. Engagement will be scheduled around seasonal movement and livelihood activities. Absence from a public meeting will not be interpreted as lack of interest.

5.6 Representation and Direct Participation

Representatives of vulnerable groups will be assessed for legitimacy, accountability, diversity and possible conflicts of interest and engagement through chiefs, elders, political leaders, household heads or associations will supplement, but will not replace, direct participation by affected persons, especially where land, compensation, relocation, livelihoods, safety or grievance rights are involved.

KeNHA will ensure that vulnerable and disadvantaged persons receive accessible information, differentiated engagement, appropriate assistance and safe opportunities to participate throughout the Project life cycle.

The proposed road project is committed to ensuring that vulnerable and marginalized groups are not excluded from stakeholder engagement processes. Through targeted, practical, and culturally appropriate measures, the project will promote inclusive participation, equitable access to benefits, and effective grievance management in line with AfDB safeguard requirements.

Monitoring and Evaluation of Inclusion will be monitored using the following indicators:

- Number and percentage of women, youth, and vulnerable groups participating in consultations
- Representation of vulnerable groups in LGRCs and Project committees
- Number of grievances submitted by vulnerable groups and resolved
- Level of stakeholder satisfaction among vulnerable groups
- Evidence of integration of VMG concerns into project decisions

6 CHAPTER SIX: RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT

6.1 Implementation Arrangements and Resources

The Government of Kenya, through KeNHA, will be in-charge of stakeholder engagement activities. The overall responsibility for SEP implementation lies with the Project Implementation Unit (PIU) director. The entities responsible for carrying out stakeholder engagement activities are:

- Civil Society Organizations engaged in the project to manage social risks and undertake Community Outreach.
- Stakeholder Liaison officers
- Supervision Consultants
- Projects contractors.

The stakeholder engagement activities will be documented, and the PIU is responsible for documenting and reporting on all stakeholder engagement activities. Documentation will include stakeholder meeting minutes, attendance registers (disaggregated by gender and vulnerability), photographs, consultation summaries, issues raised and responses provided, and follow-up actions. Periodic stakeholder engagement reports will be prepared and submitted as part of the project's quarterly and annual progress reporting in accordance with AfBD requirements. The following are summaries of SEP implementation and their roles.

6.2 Project Implementation Unit (PIU)

- Overall responsibility for implementation and oversight of the SEP.
- Approve SEP updates and ensure adequate financial and human resources are allocated.
- Provide strategic leadership and ensure coordination among PIU, Consultant managing Social Risk and Community Outreach, Stakeholder Liaison Officers, Communications officers, Supervision Consultants, Contractors, and other relevant actors.
- Ensure compliance with the AfDB Environmental and Social Operational Safeguards particularly ESS(OS10).

6.3 Social Safeguards Specialist

- Lead day-to-day planning and implementation of SEP activities.
- Coordinate stakeholder consultations, public meetings, and focus group discussions.
- Manage and oversee the Grievance Redress Mechanism (GRM).
- Ensure inclusive engagement, with particular attention to vulnerable and marginalized groups (women, elderly, persons with disabilities, minority clans).
- Document stakeholder feedback and ensure it informs project design and implementation.
- Prepare periodic stakeholder engagement and GRM reports.
- Train project staff and contractors on SEP requirements.

6.4 Stakeholder/community liaison officers

Their main roles are:

- Act as the central stakeholder engagement and communication bridge between KeNHA and stakeholders, ensuring timely dissemination of project information and feedback flows.
- Ensure the GRM is implemented, including receipt, tracking, resolution, follow-up, and trend analysis of complaints and inquiries.
- Facilitate and strengthen stakeholder engagement processes, including community consultations, civil society coordination, and participatory forums.
- Maintain systematic documentation and reporting of stakeholder interactions, issues raised, response timelines, and social risk trends.
- Conduct internal audits of stakeholder engagement plans, GRM systems, identifying gaps and recommending corrective actions.
- Support awareness, training, and multi-stakeholder coordination, working with county authorities, civil society, project teams, and development partners to promote transparency, ownership, and social cohesion.

6.5 CSOs managing the Social Risks and Community Outreach activities

The main role in the project is to manage social risks associated with undertaking civil works and carrying out community outreach activities including:

- To ensure that there is two-way communication between the local community, the project, and other project stakeholders.
- Identification and mapping of the different community groups and stakeholders, their interests and issues for Community engagement.
- Develop and implement a project-specific community engagement plan that describes proposed engagement strategies, tools, responsibilities, and schedule of engagement, etc.
- Manage Gender Based Violence (GBV), and Sexual Exploitation and Abuse and Harassment (SEA/H), GBV/SEAH including working with other government entities and CSOs on referral pathways.
- Manage Grievance mechanisms
- Receive, record, and forward grievances and community feedback to the Social Specialist.
- Support vulnerable and marginalized groups to participate meaningfully in project processes.
- Facilitate two-way communication between the project and affected communities.
- Advisory role to KeNHA existing community conflict, security instability, community grievance redress mechanism.

6.6 Supervision Consultants

- Ensure stakeholder engagement is undertaken for component-specific activities.
- Coordinate consultations with communities prior to commencement of work.
- Ensure mitigation measures related to environmental and social risks are implemented.
- Work closely with the Social Specialist and CLOs to address community concerns.

6.7 Monitoring and Evaluation (M&E) Officer

- Monitor SEP implementation and track stakeholder engagement indicators.
- Conduct surveys and participatory monitoring activities.
- Prepare monitoring and performance reports on SEP implementation.

- Support learning and adaptive management of stakeholder engagement activities.

6.8 Contractors

- Implement the Contractor Code of Conduct and manage worker behavior.
- Engage with affected communities in coordination with the supervision consultant and other actors.
- Report incidents, grievances, and community concerns for resolution promptly.
- Support traffic management, safety awareness, and community health and safety measures during construction.

6.9 Qualifications and Training Requirements

Table 6- 1: Qualification and Training Requirement

S/No	Officer	Qualification
1.	Engineers	Bachelor of Science Degree in Civil Engineering (Minimum) Computer Literate.
2.	Sociologists and Community Development Officers	Bachelor of Arts Degree in Social Sciences (Minimum) Sociology, Community Development, Development Studies. Computer Literate.
3.	Environment Officers	Bachelor of Science Degree in Environment. Registered with NEMA as Associate or Lead Expert (Minimum) Computer Literate
4.	Surveyors.	Bachelor of Science Degree in Land Surveying (Minimum). Computer Literate
5.	Corporate Communications Officers	Bachelor Degree in Mass Media and Communication (Minimum). Computer Literate.
6.	Procurement Officers	Bachelor Degree in Business Administration Supply Chain Management option (Minimum). Computer Literate.
7.	Accountants	Bachelor Degree in Commerce Finance or Accounting (Minimum). Computer Literate.
8.	Legal Officers	Bachelor Degree in Law (Minimum). Computer Literate
9.	Monitoring and Evaluation Officers	Bachelor Degree in Monitoring and Evaluation, Planning, Bachelor of Commerce or any Business-related field (Minimum). Computer Literate

7 CHAPTER SEVEN: GRIEVANCE REDRESS MECHANISM

A functional GRM will be established for the Biretwo-Arror-Chesongoch(B126) road and its associated spur roads. The GRM will be accessible and inclusive, ensuring that all project-affected persons, including vulnerable groups such as women, elderly persons, persons with disabilities, and marginalized communities, can safely raise concerns without fear of retaliation. Different reporting channels will be provided, including verbal complaints through community liaison officers, written submissions, telephone hotlines, suggestion boxes at strategic locations, and referrals through local leaders and other established institutions.

7.1 Description of Grievance Redress Mechanism (GRM)

The main objective of the Grievance Redress Mechanism (GRM) is to assist in resolving complaints and grievances in a timely, effective, and efficient manner. GRM provides a transparent and credible process for fair, effective, and lasting outcomes. The GRM will:

- Develop an easy-access, no-cost, and efficient complaint procedure for the community involved and/or impacted by the project. Establish a system of investigation, response, and quick complaint resolution.
- Ensure appropriate and mutually acceptable redress actions
- Ensure that grievances are handled in a fair and transparent manner, in line with the project's internal policies, international best practices, and lender expectations.
- Avoid the need to resort to judicial proceedings
- Allow for anonymous complaints
- Not preventing access to judicial or administrative remedies

7.2 Grievance Reporting Channels

The project will establish multiple channels for submitting grievances:

- Toll-free telephone hotline: [To be established] - Kiswahili, English
- SMS/WhatsApp: [Number to be established]
- Email: grievances@[project-email].
- In-person: At the CSO's satellite offices, the resident engineer's site office.
- Suggestion boxes for anonymous reporting of complaints to be located in strategic locations such as KeNHA offices, and Construction Camps.
- Written submissions.
- Through community representatives: Chiefs, village elders, community liaison officers
- KeNHA website: Online grievance form
- AfDB Independent Recourse Mechanism (IRM)

7.3 Principles Guiding the Project-Level GRM

The AfDB and the Borrower do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects. Key principles include:

- *Accessibility and Availability:* It should be accessible to everybody who would like to submit a complaint; aid those who face barriers such as language, literacy, awareness, cost, or fear of reprisal. Linked to overall community engagement strategy.

- *Predictability*: It should offer a clear procedure with time frames for each stage and clarity on the types of results it can and cannot deliver. Clear resolution procedures.
- *Fairness*: Its procedures should be widely perceived as fair, especially in terms of access to information and opportunities for meaningful participation in the final decision.
- *Rights compatibility*: Its outcomes should be consistent with applicable national and international standards and should not restrict access to other redress mechanisms.
- *Transparency*: Its procedures and outcomes should be transparent enough to the public interest concerns at stake. Clear structured process from complaint to resolution.
- *Capability*: It should have the necessary technical, human, and financial resources to deal with the issues at stake.
- *Feedback*: It should serve to channel citizen feedback to improve project outcomes for the people.
- *Prevent escalation of grievances into communal conflict*: by responding promptly and identifying issues that escalate grievances into community conflict. Such scenarios may include local employment and labour issues often escalate to conflict and measures such as clan balance in recruitment, ample outreach on available vacancies mitigate conflict.

7.4 GRM Structure and Process

Grievance Redress Committees (GRCs):

The Plan proposes a four-level Grievance Redress committee for the project-affected persons and the communities living along the project road. The system consists of the Locational Level Grievance Redress committee, the Sub-County GRC, the County Level GRC, and lastly the Court of Law at relevant level, which depends on which court the complaints are filed. The supervision consultant, contractor and the consultant engaged to manage the social risks under the project will be required to sit on the committees. The project will also establish a workers' grievance redress mechanism to address labour issues.

Level 1: Locational level Grievance Redress Committees (SGRCs). This is the first level that addresses grievances at the settlement levels. The committees will be established through the support of the Civil Society Organizations engaged in the project to manage the social risks associated with the projects. The committee is to be chaired by the Assistant County Commissioners and assisted by the location chiefs/ assistant chiefs. The GRCs are composed of representatives from the national government (Chief), community institutions (such as the Mosques and churches), village leaders and other stakeholders who will be required to support the grievance resolution on a voluntary basis.

Level 2: Sub-County GRCs (Kerio Valley, Keiyo South, Keiyo North)

This is the second level GRM structure that supports the resolution of grievances that are not managed at the settlement level and are escalated to this level. The membership at this level comprises members from multiple stakeholders and is to be chaired by the Deputy County Commissioner, with the Sub-County Administrator serving as the deputy. The committee comprises:

- Deputy County Commissioners (chair)
- Sub-County Administrator (Assistant)
- Agriculture officer/ livestock officer
- Water Resources Authority (WRA)

- NEMA
- Ministry of Health
- Peace officer at Subcounty
- Community representative (nominated by the community)
- Women's group representative
- Youth representative
- PAP representative
- Elder/traditional leader (who brings on board traditional knowledge of grievance mechanisms for non GBV related Activities)

Level 3: County-level GRC

This is the third-level grievance redress system proposed for the project. The committee handles grievances that cannot be handled at other lower levels of the project. The county-level GRC is proposed to comprise the following:

- County commissioner representing the national government
- Representatives from the county government.
- National environmental management authority
- Social services and gender representatives
- Representative of the governor's office
- NLC County representative
- The Stakeholder Liaison Officer
- Community liaison officer

Level 4: Court of law

This is the last level of the proposed GRM. If the aggrieved is not satisfied with the resolution made at the County Level Committee, the aggrieved is free to seek legal redress.

7.5 GRM Process Steps

Table 7- 1: GRM Process Steps

Step	Description of process (e.g.)	Timeframe	Responsibility
Step 1: Grievance uptake	Grievances can be submitted via the following channels: Emails, letters, text messages, phone calls, verbal narrations, visits to the site office.	1-2 days	The focal point person receiving the grievances and providing feedback at the community level or project level.
Step 2: Sorting, processing	All grievances are logged into the GRM complaint form either in writing or verbally. The database included during registration should have: Unique reference number Date and time received Contact information (if provided) Nature of grievance Location	Upon receipt of complaint	Local grievance focal points

Step	Description of process (e.g.)	Timeframe	Responsibility
	Gender and age of complainant (if provided) Category (environmental, social, labor, SEA/SH, other)		
Step 3: Acknowledgement and follow-up	Upon receipt of the grievance, the project acknowledges the grievance with the with reference number in writing. This is a participatory process where the aggrieved can spell out their wishes as part of the resolution process. An assessment is done to ascertain the type of grievance before relevant management is notified. Assessment of the grievance helps in the determination of the magnitude and intervention paths to be adopted and assigning responsibilities. A grievance log is updated to assist in monitoring the status of the recorded grievance. The assessment of the grievance is undertaken to: Assess urgency and severity Determine appropriate level for escalation for resolution (locational, Sub-County, or County level) Assign to appropriate staff/committee for investigation Flag sensitive cases (SEA/SH, violence, child protection) for immediate attention	Within 2 days of receipt	Local grievance focal points or escalated to appropriate level.
Step 4: Verification, investigation, action	Investigation of the complaint is led by [insert] A proposed resolution is formulated by [insert] and communicated to the complainant by [insert] Complaints that are straight forward should be addressed upon receipt. However, grievances that require investigation as well as gathering relevant information, documents review, engagement with stakeholders, interviews with the complainant, risk assessment, follow up meetings analysis of evidence will require time. The investigation should be carried out within 15 days. The investigation outcome includes an investigation report highlighting the steps, procedures and recommendations to be undertaken towards grievance resolution.	Within 5 – 15 working days	Complaint Committee at various levels
Step 5: Resolution and Response	Based on investigation findings, and severity of the complaint, the GRC develops a proposed resolution, which may include: -Explanation or clarification -Corrective actions -Compensation or remediation (where applicable) -Changes to project activities or procedures	7-14 days after investigation	Complaint Committee at various levels

Step	Description of process (e.g.)	Timeframe	Responsibility
	-Referral to other services (e.g., health, legal, psychosocial) Upon Completion of the investigation, a resolution to the grievance is decided. Written feedback and response are communicated within five days upon completion of the investigation and report done. Note: Grievances related to Gender Based violence, Sexual Exploitation and Sexual Abuse will be referred to an independent consultant managing the social risks associated with the project. Care should be taken to ensure the security, safety and confidentiality of the survivor is upheld.		
Step 6: Appeal (if complainant is dissatisfied)	If the complainant is not satisfied with the resolution, they are given an option to appeal or consider recourse. Before consideration for a recourse, the project team should review and ascertain whether additional reasonable actions are appropriate. The grievance mechanism is required to incorporate any appeals provision for complaints that cannot be solved through the project grievance mechanism. The process requires continuous communication to the aggrieved. Note: Complainants always retain right to pursue judicial or administrative remedies	When required	Complaint Committee at various levels
Step 7: Implementation, Follow-up and closure	Agreed actions are implemented with specific timelines. The safeguards team is required to monitor implementation and follow up with the complainant to confirm satisfaction. Upon implementation of all recommendations and satisfaction of the complainant, the grievance is considered closed. Additionally, Once the aggrieved party is satisfied with resolution a Grievance settlement form is signed to log in satisfaction/ resolution and the case is considered closed.	When required	Complaint Committee at various levels
AfDB Independent Recourse Mechanism (IRM)	AfDB Kenya Office: Communities and individuals who believe they are adversely affected by the project may submit a complaint through the existing project-level grievance redress mechanisms or to the AfDB IRM.	When required	AfDB Kenya Office

Step	Description of process (e.g.)	Timeframe	Responsibility
Training	Training needs for staff/consultants in the PIU, Contractors and Supervision Consultants may cover areas including Environmental and Social risks and impacts in Development Projects, Labor and Working conditions; GBV, /SEAH, Occupational Health and Safety, Social Inclusion, Grievance Mechanisms and stakeholder engagement. The GRC and SEA/SH watch groups will also be trained on their role. Stakeholders and communities will also be sensitized on the GRC and GBV/SEA structures and how and where to report issues and complaints.	When required	KeNHA/Supervising Consultant/Contractor
If relevant, payment of reparations following complaint resolution	Payment for reimbursement will be done by the employer/contractor and supervised/ monitored by the supervision consultant and KeNHA. Disbursements will be handled in accordance with established grievances redress mechanism and Kenya laws and documented in the financial records of the project.		KeNHA /Contractor

7.6 SEA/SH Grievances

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH) cases require special handling to ensure survivor safety, security, confidentiality, and appropriate support. An independent consultant will be engaged to manage the GBV/SEA/SH risks of the project. The independent consultant will provide dedicated services for GBV/SEA/SH reporting and response which will include the following:

- a. **Dedicated SEA/SH Hotline:** A separate, confidential hotline will be established for SEA/SH complaints, operated by trained experts.
- b. **Survivor-Centred Approach:** All responses prioritize survivor dignity, safety, confidentiality, and informed choice.
- c. **Immediate Referral:** the service provider will be required to establish a referral system to support the survivor in the following:
 - ✓ Survivors are immediately referred to appropriate services:
 - ✓ Medical care (post-exposure prophylaxis, emergency contraception)
 - ✓ Psychosocial support and counselling
 - ✓ Legal assistance
 - ✓ Safety and security support
- d. **Trained Staff:** Designated staff/workers at all levels of the GRM/SEAH structures will receive specialized training on handling SEA/SH cases with sensitivity and confidentiality.
- e. **Referral Pathways:** Established referral pathways connect survivors to service providers (health facilities, GBV recovery centres, legal aid providers, police gender desks).
- f. **Investigation:** If the survivor wishes, an investigation will be conducted with utmost confidentiality. Perpetrators will face disciplinary action or contract termination and referral to police for prosecution, as appropriate with consent of the survivor.

- g. **Confidentiality:** GBV/SEA/SH cases must be kept in separate, secure files with restricted access. No identifying information is shared without explicit survivor consent.
- h. **Dissemination of GBV/SEA/SH channels:** Community meetings will be held in all settlements along the road corridor to sensitize them on what constitutes GBV/SEA/SH, referral pathways, toll free numbers will be provided, community watch committees and school clubs will be formed and sensitized so that they report and receive survivors. Culturally sensitive GBV posters will be placed at strategic points, with clear contacts numbers for reporting and referral pathways. A GBV technical working groups comprising of the Consortium of CSOs contracted to lead on social risks and stakeholder engagement, county department of health, police gender desk, county gender and children office and Judiciary and other local CSOs working on GBV issues will be formed and engaged on GBV/SEA/SH issues.

A standalone Gender Analysis Report developed for the project has addressed how GBV/SEA/SH issues will be addressed during project construction together a GBV/SEA/SH plan.

7.7 Labour GRM

An effective Labour Grievance Redress Mechanism (GRM) is essential to ensuring that workers' complaints and concerns are addressed promptly, transparently, and fairly. This mechanism will address any labour and working conditions grievances, such as treatment by supervisors, pay, health and safety, or other employment-related matters. The workers have the right to join a trade union of their choice and form a workers' committee to assist in addressing workers' grievances. The Labour Management Plan of this project, prepared separately, provides details of the mechanisms, including actors, and the expected turnaround time for grievance handling. ***A separate Labour Management Plan will be developed during construction to address in detail workers related grievances.***

7.7.1 Key Actors of the Workers' Grievance Redress Mechanism

The key actors and/or institutions in the Workers GRM will be as follows:

1. **Designated GRM Officer:** The Contractor's Sociologist will serve as the Contractor's designated internal Grievance Officer, with responsibility for overseeing the grievance process at the Contractor's level. The Sociologist will be supported by the Human Resource Officer. KeNHA will train the Sociologist, Human Resource Officer, and other key staff of the Contractor at the start of the Project on grievance handling in a Road Project, with an objective of building capacity to manage labour grievances effectively and efficiently. This officer will also liaise with the Resident Engineer (RE) and the relevant authorities.
2. **Workers' Representative:** A workers' representative and/or union representative will be nominated to represent workers, ensuring their interests are promoted and safeguarded.
3. **Third-party Mediators:** If internal resolution is not possible, a third-party mediator will be brought in to facilitate resolution of the grievance.
4. The Plan proposes the establishment of the following levels:
 - a. Workers GRM Committee at the Contractor's Level: Grievance
 - b. Committee at the Resident Engineer Level
 - c. Labour Committee (membership includes the government labour office).
 - d. Workers' Disciplinary Committee.

7.7.2 Steps in the Labour GRM Process

The grievance redress process will be transparent, systematic, and involve clear timelines to ensure that issues are resolved quickly and fairly. The key steps are as follows:

- Step 1: Receiving and Registering the Grievance
- Step 2: Initial Review and Assessment
- Step 3: Investigation and Mediation
- Step 4: Resolution and Action
- Step 5: Monitoring and Closure

7.8 Publicizing the GRM

The project actors will be required to create awareness on existing GRM. This will be widely publicized through:

- Posters and brochures in Marakwet, Keiyo, Kiswahili, and English at project offices, settlement areas, and in other strategic places along the project roads.
- Radio announcements on local stations
- Community meetings and consultations
- KeNHA website and social media
- Through community representatives and leaders
- Signage at project sites
- Worker induction and contractor Code of Conduct

All materials will clearly state:

- Available channels for submitting grievances
- Contact information (phone numbers, addresses, email)
- Types of grievances that can be submitted
- Process and timeframes
- Confidentiality and non-retribution assurances
- That the service is free of charge

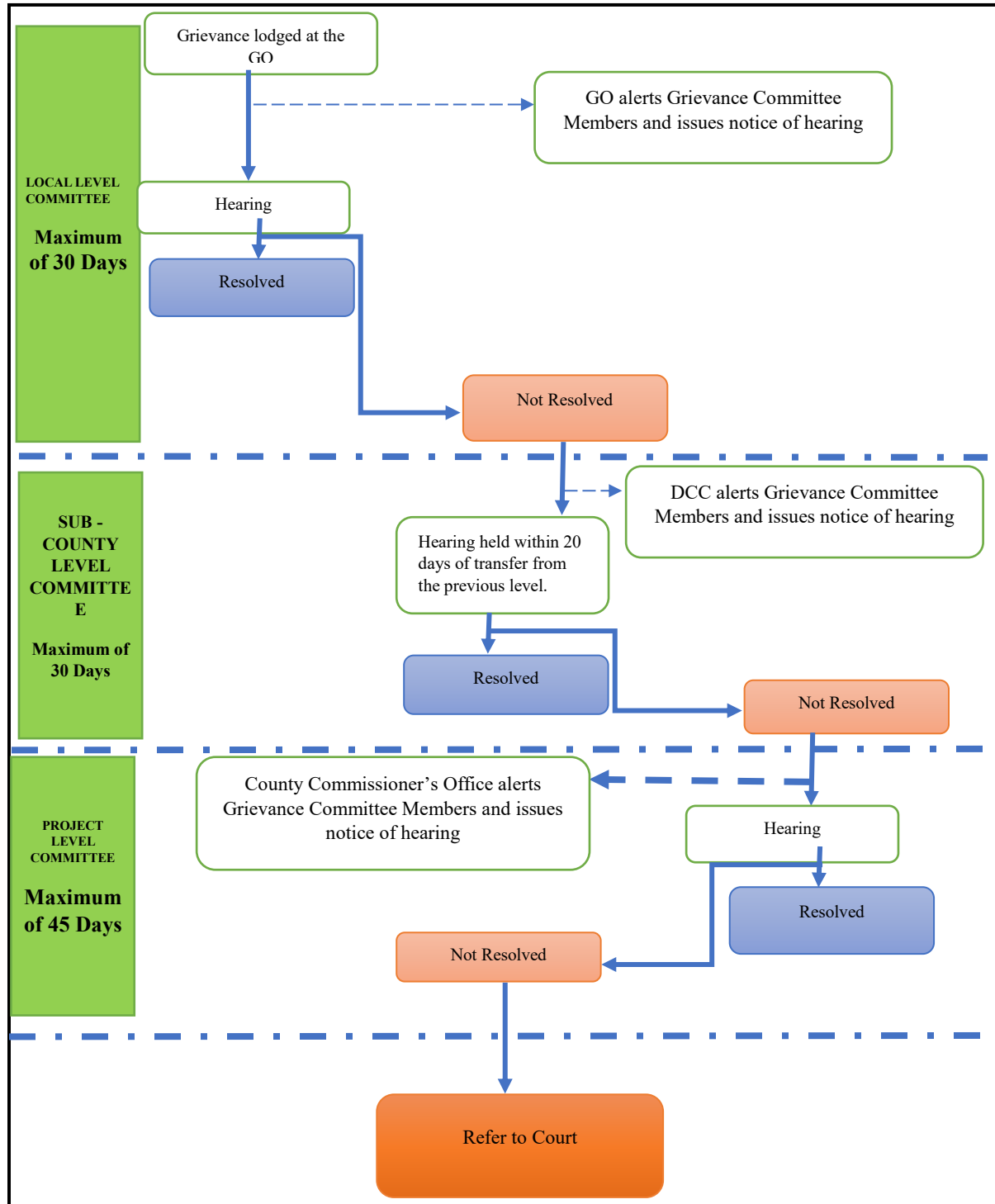


Figure 7- 1: Grievance Redress Mechanism Flow Chart

8 CHAPTER EIGHT: SECURITY AND CONFLICT SENSITIVITY

Given the security dynamics in the project area, stakeholder engagement will be undertaken using a conflict-sensitive and do-no-harm approach. Engagement activities will be carefully planned in coordination with local administration and security agencies to ensure safety, inclusivity, and neutrality. Measures will be implemented to address risks related to insecurity, clan dynamics, and misinformation, while maintaining continuous and adaptive engagement with affected communities.

8.1 Do-No-Harm Principles for Engagement

All stakeholder engagement activities will adhere to the following principles:

- **Conflict Sensitivity:** Understand local conflict dynamics and avoid actions that may exacerbate tensions
- **Inclusivity and Fairness:** Ensure equitable participation across clans, genders, and vulnerable groups
- **Transparency:** Clearly communicate project information, especially on land, jobs, and benefits
- **Neutrality:** Maintain impartiality and avoid alignment with specific groups or interests
- **Flexibility:** Adjust engagement approaches based on evolving security conditions
- **Confidentiality:** Protect the identity of individuals raising sensitive concerns (such as grievances, GBV cases)

8.2 Operational Good Practices

- Maintain real-time communication between field teams and project offices.
- Conduct pre-engagement security briefings for field teams.
- Integrate security updates into weekly/monthly planning.
- Use the Community Liaison Officer (CLO) as a key local interface for sensing tensions early.
- Align engagement schedules with local administration guidance.

Generally, parts of Kerio Valley have a documented history of episodic insecurity associated with armed banditry, cattle rustling, the proliferation of illegal firearms and inter-community conflict. These risks have particularly affected some areas of Elgeyo Marakwet, Baringo and West Pokot counties and have at different times, resulted in loss of life and property, displacement of households, disruption of schooling, restricted movement and interruption of economic activities

The Government of Kenya has implemented a multi-agency security operations, strengthened security deployments and promoted collaboration between security agencies, local administration and communities to address insecurity in the Kerio Valley. Recent government reporting indicates that these interventions have significantly reduced incidents of banditry and that calm has gradually returned to several parts of the region. Nevertheless, continued surveillance, community cooperation and local peacebuilding remain necessary to sustain the security gains.

Within the proposed project corridor, Chesongoch area has historically been associated with the wider Kerio Valley security context however, based on consultation and available security information, the area is presently reported to be relatively calm and is not considered to be experiencing the level of

insecurity recorded in previous years. There are however, isolated inter-clan tensions which may affect the project implementation if the incidents arise.

The historical insecurity affecting the wider region may have implications for project implementation if security conditions deteriorate. Potential impacts include restrictions on the movement of workers, consultants, contractors and community members; delays in consultations and construction activities; risks to the transportation and storage of project equipment and materials; disruption of access to worksites; and reduced participation of women, vulnerable households and communities located in remote areas.

This therefore calls for the need for continuous stakeholders' consultations with the local administration and security agencies including the County Security and Intelligence Committee, the National Police Service, National Government Administration Officers, community leaders, peace structures and the local affected communities, highlighting the importance of continuous coordination with existing security arrangements, conflict-sensitive stakeholder engagement and safe consultation procedures.

The Project should therefore prepare and implement a proportionate security management plan before construction commences.

Key anticipated security and conflict risks mitigation measures and monitoring indicators are detailed in the **Table 8- 1** .

Table 8- 1: Key Security and Conflict Risks Mitigation Measures

Risk / Impact	Potential Consequences	Mitigation Measures (ESMP)	Stakeholder Engagement Measures	Monitoring Indicators	Responsibility
Insecurity / Banditry	Disruption of consultations; safety risks to communities and workers	Conduct security risk assessments; avoid high-risk areas; implement security protocols	Schedule meetings during safe hours; coordinate with local administration; use local guides; flexible engagement approach	No. of incidents reported; % of planned meetings conducted safely	Contractor, CLO, KeNHA
Clan / Community Tensions	Conflict escalation; exclusion of certain groups; grievances	Conflict-sensitive planning; equitable benefit distribution; avoid bias in employment	Ensure balanced representation; hold separate FGDs where needed; involve neutral elders	Diversity of participants (clan/gender); number of conflict-related grievances	CLO, ESIA Team
Unsafe Meeting Conditions	Low participation; risk of harm during gatherings	Select safe, neutral venues; limit crowd sizes where needed	Use decentralized meetings; ensure safe access; avoid volatile periods/locations	Attendance rates; absence of incidents during meetings	CLO, Contractor
Weak Coordination with Authorities	Poor risk management; duplication or conflict with local structures	Establish coordination protocol with NGAO and security agencies	Notify Chiefs, ACCs, DCCs before engagements; follow local security guidance	Number of coordinated meetings; feedback from authorities	KeNHA, CLO, Consultant
Exclusion due to Fear/Insecurity	Vulnerable groups not participating; biased outcomes	Identify vulnerable groups; adopt targeted engagement strategies	Conduct household visits; use trusted intermediaries; provide confidential channels	Participation rates of vulnerable groups; feedback received	CLO, LGRCs
Misinformation and Rumors	Community resistance; mistrust; conflict escalation	Implement communication strategy; regular information updates	Use multiple channels (barazas, radio, leaders); rapid response to misinformation	Number of awareness sessions; reduction in misinformation-related complaints	CLO, Contractor
GBV/SEA Risks in Insecure Contexts	Increased vulnerability of women and girls	Implement GBV Action Plan; enforce Codes of Conduct	Notify Police Gender Desk Officers; Provide confidential reporting channels; engage GBV service providers; targeted awareness	Number of GBV awareness sessions; functionality of reporting mechanisms	Contractor, CLO
Do-No-Harm Failures	Engagement exacerbates tensions or inequalities	Apply conflict-sensitive planning; continuous risk monitoring	Transparent communication; inclusive participation; adapt engagement approach	Stakeholder satisfaction; absence of conflict linked to project	KeNHA, ESIA Team

8.3 SEP Budget

The budget estimate for preparing and implementing SEP is Kshs. **91,190,000**, See

Table 8- 2 for the project budget breakdown.

Adequate resources will be allocated for effective SEP implementation. Each actor responsible for SEP implementation will be required to develop the plan and facilitate its implementation throughout the project period. The following will require consideration:

- Dedicated personnel
- Consultation activities
- Capacity building
- Communication Materials and Activities
- Surveys and Assessments
- Grievance Mechanism
- Logistics and Other Costs

The budget will be reviewed annually and adjusted based on implementation experience and emerging needs. The intention is to ensure that stakeholder engagement is well-resourced, inclusive, and effective throughout the project lifecycle.

Table 8- 2: Estimated SEP Budget

Budget category	Unit	Targeted Areas/ Estimated Quantity	Frequency	Unit cost (KES)	Estimated total (KES)
County Engagement Forums	Forum	1	3	300,000.00	900,000.00
Sub-County Engagement forums	Forum	3	12	100,000.00	3,600,000.00
Community meetings and barazas	Meeting (18 Locations)	18	12	50,000.00	10,800,000.00
Focus group discussions	Session(18 locations)	18	4	20,000.00	1,440,000.00
Vulnerable Group Engagement	Session (18 locations)	18	14	30,000.00	7,560,000.00
Translation and interpretation	Assignment	5	1	100,000.00	500,000.00
Accessibility services	Assignment	1	1	5,000,000.00	5,000,000.00
Radio and media communication	Broadcast	1	6	100,000.00	600,000.00
Printing and disclosure materials	Lot	1	1	300,000.00	300,000.00
SMS and telephone communication	Lot	1	36	100,000.00	3,600,000.00
Grievance mechanism operations	Month	18	36	50,000.00	32,400,000.00
GRC training	Training	1	3	3,000,000.00	9,000,000.00
Monitoring and field verification	Forum	1	12	200,000.00	2,400,000.00
Stakeholder satisfaction survey	Survey (Yearly)	1	3	100,000.00	300,000.00
Independent review	Assignment	1	3	1,500,000.00	4,500,000.00
Sub-Total					82,900,000.00
Contingency					8,290,000.00
Total Cost					91,190,000.00

The SEP budget focus on stakeholder engagement, disclosure, feedback, communication, documentation, reporting, and coordination activities that are required for all the engagement in the project. The budget therefore includes all engagement in the project and including RAP/LRP/ESMP as well as GBV/SEA/SH as well as Grievance management.

9 CHAPTER NINE: MONITORING AND REPORTING

9.1 Summary of How SEP Will Be Monitored and Reported Upon (Including Indicators)

The SEP will be monitored based on both qualitative reporting (based on progress reports) and quantitative reporting linked to results indicators for stakeholder engagement and grievance performance. SEP reporting will include cumulative qualitative reporting on the feedback received during SEP activities, in particular

- ✓ issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the Project Appraisal Document, Environmental and Social Assessment, Resettlement Plan, Vulnerable and Marginalized Plan, or SEA/SH Action Plan, if needed;
- ✓ issues that have been raised and can be addressed during project implementation;
- ✓ issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and
- ✓ issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons.
- ✓ minutes of meetings summarizing attendees' views can also be annexed to the monitoring reports.

Given the Category 1/high-risk nature of the project, SEP implementation will be monitored and reported as part of monthly environmental and social monitoring reports. These reports will document stakeholder engagement activities undertaken during the month, stakeholder issues raised, participation of women and vulnerable groups, disclosure activities, grievances received and resolved, security or conflict-related concerns, corrective actions taken, and pending issues requiring management attention. The monthly reports will also track compliance by KeNHA, the supervision consultant, contractors and implementing partners with SEP commitments and will support adaptive management throughout project implementation.

9.2 Reporting Back to Stakeholder Groups

The SEP will be revised and updated as necessary during project implementation. Any major changes to project activities will be reflected in updated SEP versions. Stakeholders will receive regular reports on project progress through:

- Monthly environmental and social monitoring reports incorporating SEP implementation
- Quarterly updates (print and digital) in English, Swahili, and in the local dialect (Marakwet Keiyo)
- Radio programs (monthly) with project updates and Q&A sessions
- Community meetings (quarterly) to present progress and receive feedback
- Notice board updates (bi-weekly) at key locations
- Website updates (monthly/ quarterly)
- Social media posts (monthly) on activities and milestones
- SMS updates (as needed) on major developments
- Annual reports.

Reports will include:

- Summary of activities completed and progress toward objectives
- Summary of consultation activities and stakeholder feedback

- How stakeholder feedback was incorporated into decisions
- Environmental and social performance
- Information on involvement of the security personnel in the project
- Grievance statistics and resolution status
- Upcoming activities and schedules
- Success stories and lessons learned

9.3 Reporting to the African Development Bank

The Implementing Agency (KeNHA) will submit regular reports to the AfBD on SEP implementation and stakeholder engagement activities as part of overall project reporting:

Bi-annual Progress Reports including:

- Summary of stakeholder engagement activities conducted
- Number and types of consultations held, disaggregated by stakeholder group
- Participation data (numbers, gender, vulnerability status)
- Key issues raised and how they were addressed
- Status of Project commitments related to stakeholder engagement
- GRM statistics (grievances received, resolved, pending) by category
- SEA/SH incidents and responses (aggregate data maintaining confidentiality)
- Challenges in stakeholder engagement and corrective measures
- Updates to SEP (if any)

Annual Reports providing comprehensive overview of:

- All engagement activities over the year
- Analysis of participation trends and vulnerable group inclusion
- Major themes from stakeholder feedback
- Environmental and social performance
- Effectiveness of engagement methods
- Lessons learned and recommendations

Ad-hoc Reports on:

- Significant incidents or issues requiring immediate attention and reporting on incident management system.
- Major changes to project scope or design based on stakeholder input
- Serious grievances or SEA/SH cases
- Conflict or security issues affecting engagement

All reports will maintain the confidentiality of individual grievances and sensitive information, particularly SEA/SH cases.

10 ANNEXES

10.1 ANNEX 1: Stakeholder Engagement Minutes and Attendance Logs

10.1.1 First Round Meetings Records

 Minutes Arror.pdf  Minutes Biretwo.pdf  Minutes Muskut.pdf  Minutes Nyaru.pdf

 Arror Lists.pdf  Biretwo Lists.pdf  Muskut Lists.pdf  Nyaru Lists.pdf

10.1.2 Second Round Meetings Records

 meeting minutes_All.pdf  Arror.pdf  Biretwo.pdf  Emsea.pdf  Kapkayo.pdf  Keu_Emsoo.pdf

 Kiboimwa.pdf  Kimwarer.pdf  Rimoi.pdf  KII Combined attachments.pdf  KII.pdf  GA KII Elgeyo.pdf

10.1.3 Engagement with the National Land Commission

 Attendance for stakeholder meeting t

Minutes of Engagement on LRP

 Kimwarer Minutes.pdf  Kapkayo Minutes.pdf  EmseaKibargoi Minutes.pdf  Arror Ward Admins camp meeting minute.pdf  Rimoi Minutes RAP_LRP April 2026.pc  Keu Minutes RAP_LRP April 2026.pdf

 Chesetan Minutes RAP_LRP April 2026.p  Biretwo Minutes RAP_LRP April 2026.p

		
NLCKeNHA and Consultant Meeting	Notes from the stakeholder engagement	Attendance for stakeholder meeting

ANNEX 1 B: Sample Stakeholder Engagement Log

Month: Year:

Date and time	Venue/Location	Stakeholder met	Category of stakeholder	Objective of the meeting	Main Issues discussed	Response	No. of persons in attendance (male, female)

10.2 ANNEX 2:Monitoring and reporting

Key Evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
Grievance Management: To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has the implementing agency responded to and managed such grievances?	•Are project-affected parties raising issues and grievances? •How quickly/effectively are the grievances resolved?	•Usage of GM and/or feedback mechanisms •Requests for information from relevant agencies. •Use of suggestion boxes placed in the villages/project communities. •Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. •Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. •Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant.	•Records from the implementing agency and other relevant agencies •Interviews •Surveys •Grievance logs
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?	•Was there interest and support for the project? •Were there any adjustments made during project design and implementation based on the feedback received? •Was priority information disclosed to relevant parties throughout the project cycle?	•Active participation of stakeholders in activities •Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. •Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation.	•Stakeholder Consultation Attendance Sheets/Minutes •Evaluation forms •Structured surveys •Socialmedia/traditional media entries on the project results

		•Number of disaggregated engagement sessions held, focused on at-risk groups in the project.	
Implementation effectiveness. Were stakeholder engagement activities effective in implementation?	•Were the activities implemented as planned? Why or why not? •Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not?	•Percentage of SEP activities implemented. •Key barriers to participation identified with stakeholder representatives. •Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness.	•Communication Strategy (Consultation Schedule) •Periodic Focus Group Discussions •Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives. •Stakeholder surveys.

10.3 ANNEX 3:Confidential PAP Register Template

Individual agreement form, between the Project Affected People (PAP) and the Developer.

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Republic of Kenya

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A. BASIC DATA

1. *Project name:*
2. *Sub-project/activity that triggers the resettlement:*
3. *Location of the affected asset (village, municipality, district, region):*
4. *Site or Corridor where the affected asset is/are installed:*

B. IDENTITY OF THE PROJECT AFFECTED PERSON (PAP)

1. *PAP's code:*
2. *Name & Surnames:*
3. *Age:*
4. *Sex:*
5. *Representative of Household or minor?* ☐ if ticked, provide signed /authorization to represent.
6. *Physical address:*
7. *Tel.*
8. *Nature & ID no.:*

C. NATURE/TYPE AND REPLACEMENT COST¹ OF THE AFFECTED ASSET

No.	Nature of affected asset	Characteristics/Quantity/Size of the affected asset	Tick	Nominal value (\$)	Agreed compensation (Amount in real value &/or in-kind)
1.	Land		☐		
2.	Built land		☐		
3.	Residential building (primary residence)		☐		
4.	Building in rent		☐		
5.	Shop		☐		

¹ Replacement is provided in kind for: (i) primary and sole residence and (ii) subsistence food production farm. The payment of cash to the PAP is not recommended in these two cases.

6.	Hangar		☐		
7.	Fence		☐		
8.	Grave/graveyard		☐		
9.	Sacred/worship site		☐		
10.	Fallow		☐		
11.	Livestock farm		☐		
12.	Fish ponds		☐		
13.	Plantations		☐		
14.	Crops		☐		
15.	Income-generating activities other than agriculture		☐		
16.	Others:				
Total real amount due to the PAP (including in-kind compensation)					

D. NATURE OF THE ASSISTANCE PROVIDED TO THE PAP

No.	Nature of the assistance	Tick	Nominal value (\$)	Agreed compensation (Amount in real value &/or in-kind)
1.	Temporary rent	☐		
2.	Moving expenses	☐		
3.	Capacity building	☐		
4.	Vocational training	☐		
5.	In-kind subsidy/inputs	☐		
6.		☐		
7.	Other (specify)	☐		
Total real amount due to the PAP (including in-kind compensation)				

Based on the assessments and negotiations carried out within the context of the resettlement for the works (development/construction) of the project, and by mutual agreement, the PAP receives the sum of *[total amount in full spell]*.....

.....

and/or *[list the in-kind goods/benefits]* as compensation².

Project Affected Person (PAP)	Details of the Valuer

² Like the identification and assessment of asset and damages suffered as a result of the project, this agreement was signed without any constraint or threat of reprisals against the affected person, and with full knowledge of the implications and effects of the signatures affixed.

Signature & date Name & Surname	Signature & date Name & Surname, Function
<i>PAP's Witness # 1</i> Signature & date Name & Surname, Tel., ID no.	
<i>PAP's Witness # 2</i> Signature & date Name & Surname, Tel., ID no.	

10.4 ANNEX 4:Acknowledgement Form Template

GRIEVANCE ACKNOWLEDGEMENT FORM

<i>Instructions: This form is to be completed by the Grievance Officer and mailed or delivered to the complainant.</i>	
Date Grievance Received:	Serial Number:
Name of Complaint:	
Address:	
Telephone number	
District	
Village / Estate / Mtaa	
ID number	
Male / Female	
Mode of Filing Inquiry or Grievance (check ✓): ☐ In person ☐ Telephone ☐ E-mail ☐ Phone Text Message ☐ Website ☐ Grievance/Suggestion box ☐ Community meeting ☐ Public consultation ☐ Other _____	
Description of complaint:	
For follow-up purposes kindly contact:	
Name	
Telephone number:	
Email Address	
Deadline for Response from Contractor (No. of days from date grievance received):	
Expected Date:	

10.5 ANNEX 5: Grievance Resolution Form Template

GRIEVANCE RESOLUTION FORM

PROJECT

COMPLAINANT DETAILS	
Name of Complainant:	
Address:	
Telephone number	
District	
Village / Estate / Mtaa	
ID number	

Date of response to complaint:

Response of complaint:

Name of witness (if available):

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Acknowledgement of resolution of grievance:

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10.6 ANNEX 6 Detailed Stakeholder Engagement Budget



SEP Budget
-15-7-2026.xlsx