

ESMS Screening & Clearance Report

Step 1a: Project Data

The fields below are completed by the project proponent

Project Title:	Strengthening forest management for improved biodiversity conservation and climate resilience in the southern rangelands of Kenya		
Project proponent (e.g. IUCN programme):	ESARO		
Project ID		Funding agency:	GEF
Name and function of staff leading project development:	Charles Oluchina	Entity executing/managing the project:	National Environmental Management Authority (NEMA) and IUCN Kenya Country Office
Expected start date and duration:		Contract value (in CHF):	
Country:	Kenya	Geography/landscape:	Southern Rangelands of Kenya in Kajiado and Narok Counties

Step 1b: Completing the ESMS Questionnaire (enclosed as Annex)

The fields below are completed by the project proponent

	Name and function of individual representing project proponent	Date
ESMS Questionnaire completed by:	Romain Vidal – Agriculture, Water and Environment Specialist Enoch Mobisa – Team Leader – Land/forest restoration and pastoralism expert	1 st October 2020
Has a safeguard screening or ESIA ¹ of the project been done before? Or any form of an environmental and/or social assessment related to the project or to its components? For GEF projects see footnote ²		<input type="checkbox"/> yes <input checked="" type="checkbox"/> no
If yes, provide details (content of assessment, what gaps may exist, whether data is still current enough and whether the relevance and quality of data has been assessed by proponent):		
n/a		

Step 2: Formal ESMS Screening

The below Screening Report is completed by the IUCN ESMS reviewer(s).

	Name	IUCN unit and function	Date
IUCN ESMS Reviewer:	Linda Klare		6.10.2020
	Francis Musau		

¹ Environmental and Social Impact Assessment (ESIA) or any other type of impact assessment (a partial ESIA, a targeted assessment of environmental and/or social risks etc.)

² Safeguard screening of GEF projects is the responsibility of the IA. If IUCN is an EA, screening by IUCN is usually not needed. It is however advised to review the IA's screening report.

	Title	Date			
Documents submitted at Screening stage:	Project Document	5.10.2020			
	Gender Analysis and Action Plan	5.10.2020			
ESMS Screening Report		Required assessment topics or management measures/plans	Rating of environmental and social risks³		
Environmental and Social Risks <i>(see section B of the questionnaire for details)</i>			Likelihood (1-5)	Impact (1-5)	Significance (L, M, H)
Gender equality and risks			3	3	Moderate
Risks of affecting vulnerable groups		Social assessment to identify risks on vulnerable groups from use restrictions	3	4	Moderate
Risk of violating human rights incl. substantive and procedural rights			3	2	Low
Community health, safety and security risks			3	2	Low
Labour and working conditions			3	2	Low
Resource efficiency, pollution, wastes, chemicals and GHG emissions			3	2	Low
Risk of project design failing to take climate change into account			3	3	Moderate
Other environmental or social risks <i>(add new rows below for each risk):</i>			n/a	n/a	n/a
ESMS Standards	Trigger	Required management measures/plans	Likelihood (1-5)	Impact (1-5)	Significance (L, M, H)
Involuntary Resettlement & Access Restrictions <i>(see section C1 of the questionnaire for details)</i>	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Resettlement Action Plan <input type="checkbox"/> Resettlement Policy Framework <input type="checkbox"/> Action Plan to Mitigate Impacts Access Restriction <input type="checkbox"/> Access Restrictions Mitigation Process Framework <input type="checkbox"/> Other:	n/a	n/a	n/a
Indigenous Peoples <i>(see section C2 of the questionnaire for details)</i>	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Indigenous Peoples Plan <input type="checkbox"/> Indigenous Peoples Planning Framework <input type="checkbox"/> Other:	3	3	Moderate
Cultural Heritage <i>(see section C3 of the questionnaire for details)</i>	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Chance Find Procedures <input type="checkbox"/> Other:	3	2	Low

³ The entries for likelihood and impact are taken from the ratings established at the end of each section in the questionnaire. Guidance for rating the likelihood, impact and significance is provided below (see heading in purple). For more information on these ratings, please see the Guidance Note on Assessment and Management of Environmental and Social Risks available at www.iucn.org/esms.

Biodiversity & Sustainable Use Natural Resources <i>(see section C4 of the questionnaire for details)</i>	<input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> TBD	<input type="checkbox"/> Pest Management Plan <input type="checkbox"/> Other:	3	2	Low
Project Risk Category:	<i>The project risk category rates the overall project; it is based on the rating of likelihood and magnitude established for each E&S risk area and for the ESMS Standards. The overall rating is usually that of the highest risk.</i>		<input type="checkbox"/> low risk	<input checked="" type="checkbox"/> moderate risk	<input type="checkbox"/> high risk
Required assessments and management measures/plans:	<input type="checkbox"/> Full Environmental and Social Impact Assessment (Full ESIA) <input type="checkbox"/> Partial ESIA <input type="checkbox"/> Targeted Assessment (social assessment, targeted environmental studies etc.)	<input type="checkbox"/> Environmental and Social Management Plan (ESMP) <input checked="" type="checkbox"/> Environmental and Social Management Framework (ESMF) <input type="checkbox"/> Abbreviated ESMF <input type="checkbox"/> Other:			
Brief summary of the main findings: main risk issues, their significance and justification of the overall project risk categorization; assessments and measures / plans to address risks and to meet provisions of the ESMS Standards and timing of each	<p>The project is designed to bring about a number of environmental, economic and social benefits through the strengthening of governance, institutions and community capacities for sustainable land management, introduction of restoration and sustainable land-use practices and strengthening of value chains. Environmental benefits include, among others, improved soil conservation and reduction of erosion and sedimentation, improved biodiversity and biological connectivity through agroforestry and sustainable pastoral systems, improved tree cover and reduction of GHG emissions. Expected social benefits include, among others, improved income through strengthened value chains in livestock, crop production and ecotourism, improved water access, mitigation of human/wildlife conflicts and reduced household dependency on biomass energy.</p> <p>Despite the overall positive expected outcomes, the ESMS Screening identified risks of unintended social and environmental impacts. However, these risks are not expected to result in any significant adverse impact, most of them are considered of minor magnitude, are limited in scale and duration and can be readily avoided, managed or mitigates with known and accepted measures. Hence the project is classified as a moderate risk project.</p> <p>The Screening further concluded on the need to develop an Environmental and Social Management Framework (ESMF) as the specific sites (villages/communities) and activities (in the following referred to as sub-projects) will only be decided during the project. The ESMF will serve as guidance for ensuring that the sub-projects, once defined, will be assessed on potential environmental and social impacts and appropriately managed, in line with the requirements of the IUCN ESMS and with the GEF Safeguard policies. The project executing partners and the project management unit (PMU) will follow this ESMF to ensure environmental and social risks of sub-projects are identified and appropriately assessed, and management measures are in place prior to the implementation of the relevant project activities. The ESMF will be publicly disclosed via electronic links on the website of the Accredited Entity (IUCN) and the Executing Entities (IUCN Kenya country office and NEMA).</p> <p>Standard on Indigenous Peoples: The standard is triggered as project activities take place on indigenous peoples land or territory. The project area is inhabited by Maasai communities that under international law are considered indigenous peoples. These communities have traditionally lived in the project area. There are very small numbers of other ethnic groups in the areas of Ewuaso Kedong, Keekonyokie and upper Suswa and Loita (Naroosura); but these are workers who have moved in to work on ranches of the Maasai in small scale crop production or are leasing land from the Maasai and as such not considered under this standard.</p> <p>The Government of Kenya does not recognize the concept of indigenous peoples but follows the position of the African Commission on Human and Peoples' Rights (ACHPR) who argues that all Africans are indigenous to Africa in the sense that they were there before the European colonialists arrived. The Kenyan Constitution does, however, address risks of marginalized communities and groups and calls for procedures for affirmative action (Article 56); and the definition of marginalized groups include traditional people, indigenous communities maintaining a traditional lifestyle and livelihood as hunter or gatherer and pastoral persons and communities (being nomadic or a settled).</p> <p>The standard requires effective and meaningful consultation with indigenous people's representatives that social risks and impacts are properly assessed and potential adverse impacts avoided or measures are identified through a consultative process that minimise adverse</p>				

impacts and/or provide adequate compensation. These requirements will be ensured by engaging SORALO, the representative organization of the 16 Maasai group ranches in the area targeted by the project, and representatives of the local communities in the identification of the rangeland restoration sites (through the landscape restoration opportunity assessment process, ROAM) and in the development of the forest and rangeland landscape restoration investment action plans. The social analysis undertaken in parallel to the ROAM process will ensure that vulnerable groups within the indigenous communities are identified, potential impacts are assessed and, where relevant, mitigation measures are developed to be included in the action plans. Guidance on the social analysis has been provided in the ESMF.

These planning tools and processes will ensure that the identified activities will provide culturally appropriate and gender inclusive benefits and that their rights related to cultural heritage and values, traditional knowledge, practices, customary institutions are fully respected and supported. Therefore, and in light of the fact that the Maasai are the dominant ethnic group in the project site and risks of marginalization can be excluded, there is no need for affirmative action through an Indigenous Peoples Plan. The restoration plans will be validated by the communities in a process that follows the principles of FPIC. The screening of the sub-projects will deliberate about the potential need for further consultations following FPIC with regards to other project activities that will be decided after site selection and finalizing activity planning at the local level.

Standard on Cultural Heritage: There is a low risk of encountering physical cultural resources when carrying out constructions work (e.g. water infrastructure). Albeit such infrastructure will be of small size, for precautionary reasons chance find procedures will need to be developed and made available to the parties involved in the construction work.

The project does not intend to restrict access to cultural sites, but recognizes that the development of ecotourism opportunities for generating income for the communities may involve the use or development of economic benefits from cultural heritage which will require FPIC from the respective rights holders. As such use will only be decided during the project after site selection and finalizing activity planning at the local level, guidance has been provided in the ESMF.

Standard on Involuntary Resettlement & Access Restrictions: The rangeland and forest restoration and management practices identified by the ROAM process are expected to increase the productivity of the land and as such have a beneficial impact for resource users in the long run. However, use restrictions and control of access to the various resources might be needed which can have short-term impacts on the livelihood of people who are dependent on these resources, in particular vulnerable groups or people living from the illegal extraction of the resources (e.g. charcoal burners). Pastoralists may be affected by the control of access to the grazing land. Being community land, the process to establish regulations on access and use will be decided by the communities and will be the result of a negotiation process. The Standard is not triggered because the decisions on restrictions will be taken by the communities themselves and not imposed by external parties.

Notwithstanding, the social impacts of possible restrictions need to be addressed by the project as social impacts. It is acknowledged that project design already includes strategies (e.g. value chain development providing new income opportunities etc.), but it is not clear whether these measures can effectively mitigate potential impacts of all people potentially affected by restrictions. Hence, the ESMF should provide guidance how the following can be ensured:

- Demonstrate that decisions about use restrictions are not imposed but taken by the communities themselves (more precisely the resource users and rights holders);
- Ensure that potential impacts on vulnerable members of the community whose livelihoods depend on the resources to be restricted are analysed;
- In case impacts have been confirmed as significant, that measures are available to mitigate adverse impacts, if any, on the vulnerable members of the community.

Standard on Biodiversity & Sustainable Use Natural Resources: The Standard is triggered as some risk issues have been identified, including the risk of increasing pressure on local ecosystems, risks for water quality and impacts on water flows. As the project sites and activities have not been defined in detail, the ESMF provides guidance to ensure that these risks are checked as part of the screening of the sub-projects and that control and mitigations measures will be put in place.

Other Environmental and Social Risks:

Other social impacts have been identified but are considered not very likely and of minor magnitude. These include community health and safety risks related to potential accidents during constructions of water infrastructure and caused by water pollution from livestock, risks related to labour and working conditions in the promoted value chains and the potential of generating conflicts between communities or individuals in case the selection of sites, provision of service or allocation of benefits is perceived as unjustified preferential treatment. Gender-based violence is a contextual risk factor and therefore a mechanism for prevention and response should be developed and put in place. Environmental risks might be triggered by the value chain activities including contributing to an increase in consumption of energy, water or other resources, generating waste or waste water, but overall are considered not very likely given the small scale of these activities. The ESMF has provided guidance for controlling and mitigating the identified environmental and social risks as well as systematic procedure for screening the sub-projects.

Guidance for rating environmental and social risks

The rating of risks is based on the assumptions that the management measures and plans specified in the respective column are implemented and effective in mitigating the risk. It is good practice that the plans are available before ESMS Clearance. Risk rating is based on the two elements: likelihood and the expected impacts (consequence).

Likelihood represents the possibility that a given risk event is expected to occur. The likelihood should be established using the following five ratings:

- *Very unlikely to occur (1)*
- *Not expected to occur (2)*
- *Likely – could occur (3)*
- *Known to occur - almost certain (4)*
- *Common occurrence (5)*

Impact (or consequence) refers to the extent to which a risk event might negatively affect environmental or social receptors – see below criteria distinguishing five levels of impacts:

Table 1: Rating impact of a risk event

<i>Severe (5)</i>	Adverse impacts on people and/or environment of very high magnitude , including very large scale and/or spatial extent (large geographic area, large number of people, transboundary impacts), cumulative, long-term (permanent and irreversible) ; receptors are considered highly sensitive ; examples are severe adverse impacts on areas with high biodiversity value ⁴ ; severe adverse impacts to lands, resources and territories of indigenous peoples; significant levels of displacement or resettlement with long-term consequences on peoples' livelihood; impacts give rise to severe and cumulative social conflicts with long-term consequences.
<i>Major (4)</i>	Adverse impacts on people and/or environment of high magnitude , including large scale and/or spatial extent (large geographic area, large number of people, transboundary impacts), of certain duration but still reversible if sufficient effort is provided for mitigation; receptors are considered sensitive; examples are adverse impacts on areas with high biodiversity value; adverse impacts to lands, resources and territories of indigenous peoples; significant levels of displacement or resettlement with temporary consequences on peoples' livelihood; impacts give rise to social conflicts which are expected to be of limited duration.
<i>Medium (3)</i>	Adverse impacts of medium magnitude, limited in scale (small area and low number of people affected), limited in duration (temporary), impacts are relatively predictable and can be avoided, managed and/or mitigated with known solutions and straight forward measures.
<i>Minor (2)</i>	Adverse impacts of minor magnitude, very small scale (e.g. very small affected area, very low number of people affected) and only short duration, may be easily avoided, managed, mitigated.
<i>Negligible (1)</i>	Negligible or no adverse impacts on communities, individuals, and/or on the environment.

⁴ For the definition see IUCN ESMS Standard on Biodiversity Conservation and Sustainable Use of Natural Resources.

Significance of risks is established by combining likelihood and expected impact (consequence) of a risk event as demonstrated in the table 2. The significance rating signals how much attention the risk event will require during project development and implementation and the extent of control actions to be put in place. See the Guidance Note on Assessment and Management of Environmental and Social Risks for further details on the rating (including factors influencing the likelihood and impact).

Table 2: Rating significance of a risk event

		Likelihood of occurrence				
		<i>Very unlikely to occur (1)</i>	<i>Not expected to occur (2)</i>	<i>Likely – could occur (3)</i>	<i>Known to occur - almost certain (4)</i>	<i>Common occurrence (5)</i>
Impact	<i>Severe (5)</i>	Moderate	Moderate	High	High	High
	<i>Major (4)</i>	Low	Moderate	Moderate	Moderate	High
	<i>Medium (3)</i>	Low	Low	Moderate	Moderate	Moderate
	<i>Minor (2)</i>	Low	Low	Low	Moderate	Moderate
	<i>Negligible (1)</i>	Low	Low	Low	Low	Low

Step 3: ESMS Clearance of Project Proposal

The purpose of the ESMS Clearance stage is to confirm the risk classification that has been established by the formal ESMS Screening and to review and approve the risk assessments and safeguard tools developed. It is completed at the **end of project development** prior to approval of the project. The fields below are completed by the IUCN ESMS reviewer.

	Name	IUCN unit and function	Date
IUCN ESMS Reviewer Clearance Stage:			
	Title		Date
Documents submitted at Clearance Stage:			
Have findings from the risk assessment or other final steps of project development triggered any changes to the risk classification of the project? If yes, explain and indicate the risk areas where modifications were made.			
Have the ESMS actions requested by the ESMS Screening been completed (e.g. tools and other actions)? Has this been done in a satisfactory manner? Has the implementation of the tools been budgeted for?			
Are there ESMS actions requested by the ESMS Screening that still need to be completed during the project? If yes, specify the actions and respective deadlines?			
Has the quality of stakeholder consultation during project design been adequate? Have results of the consultations been documented (disaggregated by gender, where relevant)? Does			

this demonstrate how the consultations were used to inform project design?			
Has a Stakeholder Engagement Plan (SEP) been developed that describes how the identified stakeholder will be further engaged during project implementation?			
Is the SEP inclusive and provides for active participation of a wide range of stakeholders – particularly women, civil society organizations, indigenous peoples, representatives of the local communities and local groups?			
Are provisions made for monitoring the SEP during project implementation?			
Has a project-level grievance redress mechanism (GRM) been established that explains the processes for submitting, resolving and escalating grievances? Is the GRM culturally appropriate, readily accessible for local stakeholders and provide appropriate confidentiality protection?			
Have stakeholders been informed about the GRM?			
CLEARANCE DECISION			
<input type="checkbox"/> Cleared	The conclusions are positive and the project proposal meets all requirements with regards to avoiding or reducing environmental and social risks: the proposal is accepted.		
<input type="checkbox"/> Conditionally cleared	The conclusions above call for improving one or more ESMS action and/or for important re-formulation of tools and mitigation measures. This will lead to the proposal being conditionally cleared; the reviewer will provide guidance on the way forward.		
<input type="checkbox"/> Clearance rejected	Essential ESMS provisions have not been complied with, plans or other actions have not been completed and critical mitigation measures have not been incorporated or don't seem feasible or sufficient for avoiding or minimizing impacts; or significant data gaps still prevail and additional field assessments are required.		
Rationale – Explain clearance decision (why cleared, conditionally cleared or rejected):			
Clearance conditions (when conditionally cleared) - Explain tasks to be completed during the project:			
Approval ESMS Clearance (M level or above)			
Name	IUCN Unit and Function	Date	Signature

A. Project summary

To be completed by project proponent

Please summarise the project briefly using no more than one page. The summary can be in form of bullet points. Include goal/objectives, expected results/outcomes, outputs (project deliverables) and main activities. Please also describe the project sites and the project area of influence⁵.

The goal of the project is to restore degraded rangeland resources- forests, wildlife, soils and water thereby restoring the integrity of the ecosystem, improving wildlife conservation, improving people's livelihoods and enhance resilience (of both livelihoods and ecosystem) to climate change. All the drivers of negative processes in the environment will need to be reversed: governance systems improvement will lead to sustainable management of the rangelands which will in turn influence investment decisions. Improved ecosystems and governance systems will attract more investments in tourism and livestock value chains that will improve the payments for ecosystem services and goods. All the lessons learned will be used to influence policy and build the local people's capacity to sustain the benefits of the project.

The project has four expected outcomes:

- Governance, institutions and community capacity for sustainable land management is strengthened.
- Restoration and sustainable integrated land use management actions are implemented.
- Sustainable investments in resilient livelihood actions are increased.
- Sustainable landscape management actions are informed, coordinated and mainstreamed at county and national level.

Another way to describe the expected outcomes of the project could be:

- Restored rangelands and thriving biodiversity.
- Well-resourced households deriving sustainable livelihoods through sustainable extraction of their natural resources.
- A repository of knowledge, a sharing platform and communities understanding that economic activities affect and are affected by ecological processes.

Main activities are :

- Support through capacity building to the establishment or strengthening at community level of structures and appropriate tools for value chain development, economic activities, land, environment and natural resources management
- Support to the development of extension services through capacity-building of communities and linkages with the private sector
- Definition and support to the implementation of innovative approaches : payment for ecosystem services, index-based insurance for livestock, monitoring tools
- Creation of infrastructures for the communities : community farm, water harvesting infrastructures...
- Supply of materials aiming to develop economic activities and mitigation of disasters
- Support innovation, capitalization and knowledge of the area through mapping and the strengthening of the Green Points and links between local and national level
- Definition and support to the implementation of M&E at community and regional level

⁵ The project area of influence is the area likely to be affected by 1) the project and the project partner's activities and facilities that are directly owned, operated or managed by the partner and that are a component of the project, 2) impacts from unplanned but predictable developments caused by the project that may occur later or at a different location or 3) indirect project impacts on biodiversity and on ecosystem services upon which affected communities livelihoods are dependent.

Guidance on completing the questionnaire

- Answer the questions in the 'Project proponent' column by selecting 'Yes, no, n/a (not applicable) or TBD (to be determined)'; in the second column provide additional information - describing the risk, whether it will need to be further assessed, and/or how the risks will be **avoided or managed** (minimized or mitigated).
- If you don't have the required information, describe how you would gather the data during the project preparation phase or during project implementation. Please note that additional activities identified and specified in this exercise will either need to be integrated into the ToR for the risk assessment or into the project design as project activity. E.g. if you describe that land rights of local communities will be assessed, this either needs to be included in the ToR of a social assessment or specified as project activity.
- If the information requested can be found in the project proposal, please also reference the specific section of the proposal where this stated.

B. Assessment of social or environmental impacts

Please consider not only direct environmental and social impacts but also potential indirect, cumulative⁶ and transboundary impacts as well as impacts of associated facilities⁷			
	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, mayb w	Answer question and describe how the risks are being assessed, avoided or managed	Comments, additional considerations
B1: Gender equality and risks (including gender-based violence)			
1. Is there a risk that the project may discriminate against women or other groups based on gender with regards to access to resources, services, or benefits provided by the project? <i>Note that equality in the process of designing the project is discussed in section D.</i>	no		While the need for equality is emphasized throughout the project document and the main challenge is that "Kenyan societies are still largely traditional and influenced by patriarchal myths, beliefs, attitudes and practices. Generally, women and girls are still accorded lower status compared to men and boys. This is reflected in the way women and girls are socialized and treated. In many societies, women continue to be perceived as inferior to men and thus are discriminated against and are not considered able to be leaders or decision maker." Hence the effective implementation of the GAP and monitoring through the proposed indicators will be key. Targets for these indicators will need to be agreed with relevant women stakeholders during inception.
2. Is there a risk that project activities inadvertently create, exacerbate or perpetuate gender-related inequalities or have adverse impacts on the situation of women and girls?	maybe	The only point of attention concerns the workload of women. They are significantly involved in the activities of the households. Implementing activities dedicated to this group could indirectly result in an overload of work that could affect the ability to care for children and live in decent conditions.	

⁶ Cumulative Impact means the collective impact of a project's incremental impact added to the impacts of other relevant past, present and reasonably foreseeable future developments, as well as the unplanned but predictable activities enabled by the project that may occur later or at a different location. Example: Substantial increase in number of tourists that frequent a site turns a project-funded PA access road into a major cause for disturbance for wildlife.

⁷ Associated Facility or Activities means a facility or activity not funded as part of the project that is necessary for the financial and/or operational viability of the project, and would not have been constructed or expanded if the project did not exist. Example: a visitor centre built by the project might require an access road as associated facility – the construction of which might trigger environmental impacts.

3. Is there a risk that the project potentially limits women's ability to use, develop or protect natural resources, taking into account different roles and positions of women and men in accessing environmental goods and services?	no		
4. Is there a risk that the project might aggravate risks of gender-based violence (including sexual harassment, sexual exploitation or sexual abuse)? Is there a risk that persons employed or engaged by the project executing agency or through third parties to perform work related to core functions of the project might engage gender-based violence? Have any such incidents been reported in the past?	no		According to Survey data women are more likely to experience physical violence committed by their spouse/partner than men and GBV is prevalent in public life and in politics. And while the central government and counties have put in place mechanism for reporting and support, the covid situation has worsened the situation. Following GEF and IUCN policy, procedures should be put in place by the EA, to identify risks and prevent incidents related to sexual exploitations, abuse or harassment (SEAH) caused by persons employed or engaged by the project. See ESMS Guidance ⁸ for more details. Such mechanism should address incidents occurred to project stakeholders, but in line with IUCN policy on Protection from SEAH the EA also needs to ensure reporting, protection and redress modalities for victims among project staff.
Conclusion of ESMS Reviewer on⁹		Estimated likelihood of risks (1-5): 3	Estimated impact (1-5): 3
B2:Risk of affecting vulnerable groups			
5. Has the project site been assessed on the presence of vulnerable or disadvantaged groups or individuals. Please name the groups; ensure that those referred to in the footnote were considered in the analysis.		The assessment of the project area was conducted through literature review of socio-economic characteristics of Kajiado and Narok Counties and through a consultation process with the communities. The experience of the team leader, Enoch Mobisa, who has been working for several years in the areas concerned and is currently carrying out a doctoral thesis in Kajiado County. The most vulnerable groups within the community are women and children, who do not have the opportunity to move easily and reach the cities for better opportunities. In times of crisis, they often stay in the area while the men leave. The other group that seems to be particularly at risk are the charcoal burners. Indeed, because of the illegality of their activity, they are in a critical situation, all the more so as they will be affected by the implementation of conservation measures.	

⁸ Available at : https://www.iucn.org/sites/dev/files/iucn_esms_gn_risk_management.pdf

⁹ Please see guidance for rating the magnitude of social and environmental impacts above. It is understood that there might still be a considerable degree of uncertainty.

		In addition additional social data will be generated during the “gender-responsive landscape restoration opportunity assessment mapping” (component 2 of the project, activity).	
6. Is there a likelihood that project risks and negative impacts fall disproportionately on disadvantaged or vulnerable individuals or groups? Consider impacts on material and on non-material livelihood conditions. Also consider changes in land use and/or tenure arrangements with a risk of disproportionately affecting vulnerable groups, including people coming from outside the project area such as internally displaced people.	yes	The project aims to implement sustainable ways for managing the land. The objective is to improve land restoration and land and natural resources management. The activities will have a positive impact on the project area in terms of sustainability of the uses. But it could result in a short term in risks for land and resource users from the community. Charcoal burners will be impacted and despite the fact their activity is illegal it will be important to ensure their involvement in the project in order to be sure that this activity does not move to another adjacent area and also to avoid social harm. Involving them in woodlot management and tree nurseries could be an effective way to prevent them from pursuing their activities. The project also includes a sensitization and awareness plan at community level. By scaling up, out and deep the project concept this will improve the positive impact of the project by avoiding transferring problems to neighbouring areas.	This is a significant social risk issue. More is explained under C1. The ESMF to include guidance for managing this risk, including the need to carry out a social analysis in parallel to the ROAM process.
7. Is there a risk that the project might discriminate against vulnerable groups with to access to resources, services, or benefits provided by the project? <i>Note that inclusiveness in the process of designing the project is discussed in section D.</i>	no	The project aims to implement a systemic approach at the level of target communities.	
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5): 3	Estimated impact (1-5): 4
B3:Risks of infringing in human rights, including substantive and procedural rights			
8. Could the project lead to adverse impacts on enjoyment of the human rights (civil, political, economic, social or cultural) of individuals or groups? In terms of economic rights, consider in particular their ability to access services or resources essential to basic needs (e.g. health or education, drinking water, productive resources, sources of income, subsistence food production).	No	Risks for vulnerable groups / economic rights are covered in section B2	
9. Is there a likelihood that the project might lead to elite capture , to unjustified preferential treatment of individuals or groups (e.g. in terms of access to resources or services provided by the project) or to the formal or de facto restriction or exclusion ¹⁰ of groups from access to such resources or services?	Yes	Some activities include the supply of equipment (motorbike, milk cooler, generator, etc.). They will be allocated to groups (cooperative) or individuals. When the equipment is provided to an individual, it must be reimbursed to the group, without interest. The amount of money to reimburse can eventually be subsidized in order to be realistic with the individual economic capacities of the person. The idea is to not provide materials for free.	The open-ended design of the project it important to ensure that activities can be shaped based the results of capacity assessments and on decisions taken in the participatory processes, but it might also give rise conflicts over resource allocation. While it is acknowledged that some guidance for preventing unjustified preference or elite capture is provided in chapter 4.4, such

¹⁰ Examples for *de facto* restriction or exclusion are: information is not made available in appropriate languages, individuals with no/low income or without tenure rights (or registered titles) can't access services (e.g. agricultural extension services, persons with disabilities are confronted with physical barriers that block their access; certain groups are stigmatised by society and thus have no access services.

		Moreover, in case of supply to individuals, a fair and transparent selection process will be implemented in order to be sure that the project doesn't lead to unjustified preferential treatment. This approach is detailed in the PRODOC in the sustainability section (4.4)	procedures will still need to be defined in more details. This is also to avoid that project staff who need to make decisions about allocation of resources don't feel pressure from certain groups. Such guidance is not only relevant for decisions about direct allocation of project resources but also for the selection of sites for different project activities and for the beneficiaries' selection for PES. The ESMF to include guidance.
10. Is there a likelihood that the project would lead to future exclusion of individuals or groups from participating in decisions that may affect them (e.g. on natural resource management)?	No	The project aims to strengthen the governance of natural resources at the local level through community empowerment.	
11. Is there a likelihood that the project might contribute to the discrimination or marginalization of specific groups? (only mention situations not specified in any of the questions above)	No	The communities will be consulted when designing the selection process mentioned above; this will ensure that no social groups are discriminated, even unintentionally (e.g. the consultation will ensure that for instance barriers to accessing such services are known).	
12. Is there any history of injustice or abuse of human rights in the project area/s, including evictions and failure to compensate people for their land and/or assets when the protected area was established?	Yes	Within the project area, problems of land conflicts were reported during the field mission. Some investors from outside the project area have acquired land to develop tourism, mining or agricultural activities without consulting neighbouring communities. The conditions of land acquisition are not clear. As a result, tensions are being experienced locally.	While such issues are outside the influence of the project, it will nevertheless be important that the project does not aggravate, exacerbate or replicate such occurrences. For instance by mediating links to ecotourism investors.
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5): 3	Estimated impact (1-5): 2
B4:Community health, safety and security			
13. Has the region where the project is located been subject to civil war, inter-ethnic conflict, insurgency in the last 10 years. If so, please describe briefly	No	The region is largely inhabited by Maasai ethnic community and has been a peaceful area throughout.	
14. Is the region where the project is located affected by organized poaching, drug cultivation or trafficking, or other organized crime . If so, please briefly summarize the situation including implications on the safety of the local population.	No		
15. Will the project work in a transboundary region (including coastal and marine areas)? If so, are there areas affected by organized smuggling (wildlife products, drugs, etc.), trafficking in persons or illegal migration?	Yes	The project area partly borders Tanzania. Herders often move from one area to another with their herds. However, this is not an area considered to be affected by trafficking.	
16. Will the project support PA management and/or provide support for law enforcement activities ? If yes, please briefly describe relevant project activities and answer questions a-d. Otherwise, skip to question 17	No	The project will necessarily involve exchanges with State or county services working on issues of protected areas and environmental protection (rangers). However, there are no plans to involve <i>law enforcement</i> agencies in the project activities or support law enforcement.	

a. Which agencies are responsible for law enforcement in the project area? Do they include any community organizations or private companies?	n/a		
b. Do park rangers or other law enforcement personnel carry firearms in the course of their duty?	n/a		
c. Has there been any conflict between the management of the protected area/s and local people in the last 5 years? If so, what were the causes of the conflict (e.g. poaching, logging, disputes over access rights, artisanal mining)?	n/a		
d. Have there been any formal complaints, investigations or press reports relating to law enforcement activities in the project area?	n/a		
17. Could the project potentially increase the risk of human-wildlife conflicts in the project areas, including injury or loss of life among people or loss of assets (e.g. crops, livestock)?	No	The project aims to promote natural resource management that is beneficial to both people and wildlife. It does not include development activities that could lead to increase negative impacts from wildlife. It plans to map the territory in order to improve its knowledge and implement actions in relation to the problems identified, including beehive fences for mitigating the conflicts with elephants.	
18. Is there a risk that project activities might weaken community institutions or disrupt social interactions in the project areas?	No	On the contrary, the aim of the project is clearly to strengthen the Community institutions.	
19. Is there a potential risk that the project could exacerbate existing conflicts or generate conflicts in the project area, aside from issues mentioned above?	Yes	By promoting economic opportunities through value chain development or ecotourism the project could exacerbate local conflicts. That is why it will be particularly important to pay attention to the approaches being implemented at community level. The expert in ecotourism will support the communities for defining a sustainable way to develop tourism and implement benefit sharing plans at community level. The field mission highlighted that tourism is sometimes perceived by communities as an activity that benefits only a small number of people. Benefit-sharing schemes have often been negotiated in a relatively opaque manner. This is why the project will have to be completely transparent with an objective of equitable benefit sharing for the benefit of the entire community and not just a few leaders. Activity 2.22 aims to develop of a community-tourism benefit sharing plan.	
20. Is there a risk that the project exposes local communities to accidents or increases their vulnerability to natural hazards or disasters ? This would include exposure to hazardous substances, accidents involving vehicles and equipment, and risks related to infrastructure built by the project, in particular in areas subject to floods, hurricanes, earthquakes, etc.	Yes	The project potentially involves the creation of sand dams and other water harvesting infrastructures which might involve risk of accidents. However, the small size of the infrastructure limits the risk. Site selection and design will also be essential. The project will thus have to take into account the risks during the feasibility studies of the infrastructures through a dedicated Standard Operating Procedures (SOPs).	ESMF to include control measures to mitigate this risk

21. Could the project cause or exacerbate health and safety risks through changes related to water infrastructure (e.g. by changing flows into water infrastructure, triggering water-borne or -based diseases) or through increasing risks of other vector-borne diseases or communicable infections? Examples include the creation of stagnant water bodies, livestock activities affecting quality of portable water etc.	Yes	Water harvesting infrastructures will be designed by specialists and attention will be paid to the risks of water pollution by livestock in places where there is human consumption. Watering livestock may indeed cause contamination of water that is used for human consumption. It will be the role of the staff in charge of the design of the water points to take into account the potential issues. The improvement of the governance at community level such as the sensitization/awareness activities within the project should enable to mitigate these risks.	ESMF to include control measures to mitigate this risk
22. Is there a probability that the project could have adverse impacts on community health and safety through reduction in local air quality (e.g. through generation of dusts, burning of wastes, or burning fossil fuels and other materials in improperly ventilated areas)?	No		While it is not very likely, as the value chain activities are not known, it cannot be fully excluded. ESMF to include control measures to mitigate this risk
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5):3	Estimated impact (1-5):2
B5: Labor and working conditions affecting project workers¹¹			
23. Is there a risk that the project might involve or lead to working conditions that do not meet national labour laws and international commitments (e.g. through discriminatory working conditions, lack of equal opportunity, lack of clear documentation of employment terms, failure to prevent harassment or exploitation etc.)? Consider also work executed by contractors.	Maybe	Although the project does not include activities that could involve or lead to working conditions that do not meet national labour laws it is difficult to control working conditions within the entities that will be involved in the project. However, the organisations identified at this stage are established organisations and we are not aware of any particular problems related to them.	ESMF to include checklist labour condition, including staff but also other project worker including volunteers
24. Will the project work with community rangers or other local volunteers? If so, for what kind of activities?	Yes	The project will work with local communities and the objective is to involve them as much as possible. It means that local volunteers might be involved in the implementation of the activities.	It will be important to ensure OHS is guaranteed not only for project staff but also for volunteers. The ESMF to provide guidance.
25. Are project workers (including rangers and community patrols) exposed to the risk of violence in the course of their duties (e.g. exposure to armed poachers or to criminal groups involved in drug trafficking)?	No		
26. Is there a risk that project workers including volunteers or people engaged in community work programs might be exposed to occupational health and safety (OHS) risks including risks related to vehicles and equipment, chemical or biological hazards, exposure to infectious and vector borne diseases and specific threats to women?	Yes	Project staff and volunteers may be exposed to zoonotic diseases, insect bites and snake bites. Main risk is probably car accident.	While this is only a minor risk issues, basic OHS guidance should be developed and training provided The project will facilitate linkages between livestock fattening groups and slaughterhouses through formal agreements. As the operation of slaughterhouses is outside the scope of the project, the project is not liable for labour and working condition, including OHS. However, to prevent reputational risks, if risks issues are identified, these should be

¹¹ Project workers refer to (i) **direct** project workers (people employed or engaged directly by the project executing entity to work specifically in relation to the project), (ii) **contracted workers** (people employed or engaged through third parties to perform work related to core functions of the project, regardless of location), (iii) **primary supply workers** (people employed or engaged by the project's primary suppliers) and (iv) **community workers** (people employed or voluntarily engaged in providing community labor).

			brought to the attentions of the facilities' owner/ managing.
27. Are there any circumstances in which the project may be involved with forced labor (e.g. any work or service which someone has not volunteered for and is forced to do) or harmful child labor ¹² ? Child labor would be considered harmful if it interferes with a child's education or could be detrimental to a child's health or mental, spiritual, moral, or social development. Please consider direct and indirect work relationships (e.g. project workers, workers of project partners, including farms and other enterprises that receive benefits or services from the project).	No		In the Maasai culture unpaid child labour is considered as a normal practice of bringing up children, especially girls, in preparation for early marriage. While this is not a risk caused by the project, it might nevertheless be a topic to be included in awareness training.
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5):3	Estimated impact (1-5):2
B6:Resource efficiency, pollution, wastes, chemicals and GHG emissions			
28. Is there a risk that the project might lead to releasing pollutants to the environment or increased generation of waste or waste water due to routine or non-routine circumstances with the potential for adverse local, regional, and/or transboundary impacts? Consider in particular hazardous waste.		By strengthening value chains for livestock, horticulture and ecotourism, the project could indeed increase generation of wastes and wastewater. But it will be not hazardous wastes and it should be reminded that the project do not promote the development of polluting activities at a large scale. The model of tourism that will be promoted is ecotourism and not mass tourism. When promoting activities generating wastes at local level, the role of the project will be to inform communities and pay attention to ways for mitigating the amount of wastes produced.	While the risks are overall considered minor given the small scale of the activities because the activities are not known in detail, the ESMF to provide guidance on risk identification and control measures
29. Does the project activities involve a significant use of energy, water or other resources ? If yes, explain how it will be ensured that resources are used efficiently.	Yes	The project aims to support the strengthening of value chains and development of activities involving a use of energy and water, such as small-scale irrigation of community farms (small size) or livestock activities. CSA practices are promoted and sensitization/awareness campaigns will be undertaken. Regarding the livestock activities, the project will support Tata for ensuring the sustainability of the slaughterhouse they are promoting in the Magadi area.	The ESMF to provide guidance on risk identification and control measures. With regards to the slaughterhouse (similar as stated under 26), the operation of slaughterhouses is outside the scope of the project, hence the project is not liable for environmental impacts of such facilities. However, to prevent reputational risks, if risks issues are identified, these should be brought to the attentions of the facilities' owner/ managing. Under activity 2.15 the project foresees providing E&S expertise to the construction of a new facility by Magadi Tata Limited. It should be clarified, however, that it is the

¹² IUCN follows ILO Convention 138 on Minimum Age that sets the general minimum age for admission to employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed. For more information on the prevention of harmful Child Labour, please see the Guidance Note on Assessment and Management of Environmental and Social Risks available at www.iucn.org/esms.

			facility's responsibility to meet all statutory requirements related to such investment.
30. Might the project use or promote the use of chemicals or other hazardous materials subject to international bans, restrictions or phase-outs?) ¹³ Please note that the use of pesticides are covered in the Biodiversity Standard (Section C4).	No		This should be specified as exclusion criteria in the ESMF.
31. Will the project lead to significant increases of greenhouse gas emissions or to a substantial reduction of carbon pools (e.g. through loss in vegetation cover or below and above ground carbon stocks)?	No		
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5):3	Estimated impact (1-5):2
B7:Climate Change (risks from project design failing to take climate change into account)			
32. Have the historical, current, and future trends in climate variability and change including climate sensitivity ¹⁴ been analysed in the project area?	Yes	It has been analysed through literature review in the section 3 of the PRODOC	
33. Are changes in biophysical conditions in the project area triggered by climate change expected to impact people's livelihoods? Are some groups more vulnerable than others (e.g., women or marginalized/ vulnerable groups)?	Yes	It has been described in the section 3 of the PRODOC	
34. Is there a risk that climate variability and changes might affect the effectiveness of project activities or that project activities potentially increase the vulnerability of local communities or the local ecosystem to climate variability, temperature increases or climate hazards (e.g., floods, droughts, wildfires, landslides, cyclones, storm surges, etc)? If yes, explain how the project intends to lower such risk.	Yes	The project aims to increase the resilience of the rangeland ecosystem and of local communities to climate change by minimizing the impact of drought incidences on livelihoods through institution of water harvesting, storage and utilization methods and natural resources management strategies. However, extreme climate events might affect the project's effectiveness by degrading the infrastructures, affecting grazing areas surfaces and some capacity of the pastoralism to secure regular quality of the meat and volume of meat. Promotion of climate smart practices, livestock insurance, improved livestock breeds, grazing management plan and strong institutions have been identified as measures to mitigate such risks. The project will promote knowledge sharing at local, national and regional level and will enable to identify relevant initiatives and innovations for climate change adaptation measures. Also note that the determination of the sites and the identification of the actual restoration intervention will be based on the climate vulnerability of the sites based on exposure, sensitivity, and adaptive capacities, state of ecosystem degradation as well as respective physical and socio-economic drivers for degradation. This analysis is guided by the spatial assessment of landscape restoration opportunities following the ROAM approach.	

¹³ For instance, substances listed under the Stockholm Convention on Persistent Organic Pollutants, or other chemicals or hazardous materials subject to international bans, restrictions or phase-outs due to high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential depletion of the ozone layer, consistent with relevant international treaties and agreements.

¹⁴ Sensitivity is the degree to which a system can be affected, negatively or positively, by climate-related stimuli. IPCC, 2001

		The assessment uses a multi-criteria analysis method of identifying the spatial concurrence of different criteria related to vulnerability, drivers of degradation, opportunities, etc.	
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5): 3	Estimated impact (1-5): 3
B8: Other environmental or social risks			
1. Please list in the row(s) below any other direct, indirect (induced or cumulative), and transboundary environmental and social risks, and the risks and impacts of associated facilities: ¹⁵	n/a	n/a	
Conclusion of ESMS Reviewer on		Estimated likelihood of risks (1-5): n/a	Estimated impact (1-5): n/a

C. Potential impacts related to ESMS standards

C1: Standard on Involuntary Resettlement and Access Restrictions¹⁶

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, maybe	Answer question and describe how the risks are being assessed, avoided or managed	Comments, additional considerations
1. Will the project involve physically involuntarily resettling people or communities and/or acquiring their land (e.g. for the creation of a strict nature reserve or reducing the threat of wildlife related incidents for communities living in reserves)? if yes, answer a-b below	No	Shaded cells do not need to be filled out	Shaded cells do not need to be filled out
a. Describe the project activities that require resettlement.			
b. Have alternative project design options for avoiding resettlement been rigorously considered?			
2. Is there a risk that the project will involve forced eviction ¹⁷ ?			
3. Does the project include activities that might cause economic displacement by restricting peoples' access to or use of land or natural resources where they have traditional or customary tenure, or recognizable usage rights? Please consider the following activities: establishing new protected areas (PA) or extending the area of an existing PA, improving enforcement of PA regulations (e.g. training guards, providing monitoring and/or enforcement equipment, providing training/tools for improving management effectiveness), constructing physical barriers that prevent people accessing certain places; changing how specific natural resources are managed to a	Yes		

¹⁵ Example for cumulative impact: A project builds an access road for PA staff, but another project builds a visitor center in the PA which increases traffic on the road and causes disturbance for nesting sites etc.

¹⁶ The term "involuntary resettlement" refers to project-related land acquisition and restrictions on land use which have adverse impacts on communities and persons. Project-related land acquisition or restrictions on land use may cause physical displacement (relocation, loss of residential land or loss of shelter), economic displacement (loss of land, assets or access to assets, leading to loss of income sources or other means of livelihood), or both. Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in displacement (World Bank ESS5)

¹⁷ It is important to understand that Involuntary resettlement is different from "forced eviction"; the latter being defined as the permanent or temporary removal **against the will** of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection (WB ESS5). Forced evictions is an extreme form of involuntary resettlement and "constitutes a gross violation of human rights, in particular the right to adequate housing" (Commission on Human Rights, Resolution 1993/77).

management system that is more restrictive ¹⁸ ; if yes, answer a-h below			
Answer only if you answered yes to item 3			
a. Indicate the project activities that (might) involve restrictions <u>and</u> the respective land or resources to be restricted including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas		One of the objectives of the project is to implement sustainable land management and resources use processes. This implies in particular creating the conditions for restricting access to certain territories or resources according to the time of year and the type of user. The project will support the development of land/resource management plans and control of land/resource use through strengthened governance at the local level. The rules will therefore be defined by the community itself. They may concern the access to the land, water, forests/trees, soil.	
b. Has the legal framework regulating land tenure and access to natural resource been analysed, broken down by different groups including women and ethnic/indigenous groups? Are customary rights for land and natural resources recognized? Are there any groups at the project site whose rights are not legally recognized?		The land tenure system is mainly private although there are a few group ranches holding the land communally. The title to land for private lands is pre-dominantly in the name of the head of household who happen to be men. In a few cases, when the head is not a man, the woman/wife may be the title holder. Maasai community customary rights for natural resources, mainly grass and water, are recognized but there is flexibility that will allow for the blending of these with other practices for managing the resources.	
c. Have the implications of access restrictions on people's livelihoods been analysed? Consider adverse potential impacts on livelihoods, food security, businesses and employment due to <ul style="list-style-type: none"> • Loss of access to natural resources in a particular area, • Loss of access to social services such as schools, health care etc, • Change of quality/quantity of resources a household can access, • Change in seasonal access to a resource, • Change in nature of access (i.e. from unregulated to regulated), • Change in types of assets needed to access resources; If yes, please elaborate on the different livelihood elements that are affected, explain who might be affected and describe impacts. Distinguish between social groups (incl. vulnerable groups, indigenous peoples), men and women; also consider impacts of restrictions on people coming from outside of the project area.		The objective of a better control of access to the various resources is precisely to improve the livelihoods of the communities. However, there is a risk of negatively impacting populations living from the illegal extraction of the resources. Charcoal burners would be affected by not being able to continue their activities. It would impact men and women because men do the burning and mostly women are involved in selling/retailing. Pastoralists may be affected by the control of access to the grazing land.	
d. Have strategies been considered to avoid restrictions by making changes to project design? If yes, explain.		Yes. Strengthening community organizations and the governance systems of natural resources management including Integrated sub-catchment plans, Integrated resource use plans for CFAs and seasonal grazing areas/plans will be designed in such a way that people have equitable access to the resources.	

¹⁸ Note that the Standard "does not apply to restrictions of access to natural resources under community-based natural resource management projects, i.e., where the community using the resources collectively decides to restrict access to these resources" (e.g. introduction of restrictions to ensure continued access to these resources) "provided that an assessment establishes that the community decision-making process is adequate and reflects voluntary, informed consensus, and that appropriate measures have been agreed and put in place to mitigate adverse impacts, if any, on the vulnerable members of the community" (WB ESS5).

e. If it is not possible to avoid restrictions, will the project include measures to minimize or compensate for impacts from loss/restrictions of access? Please describe the measures.		The objective of the project is to work specifically on conservation <u>and</u> livelihood conditions. One of the main characteristic is then to provide alternatives to people living from the overuse or illegal extraction of the resources in order to create the conditions for a better conservation of the ecosystem. By strengthening the livestock value chain, support the development of alternative livelihoods (beehive, crop production, private services at the community level such as transport).	
f. Are eligibility criteria established that define who is entitled to benefits or compensation? Are they transparent and fair (e.g. in proportion to their losses and to their needs if they are poor and vulnerable)?		Not relevant.	
g. Are these measures culturally appropriate and gender inclusive? Does the geographical scale of the measures match the scale of the restrictions (e.g. will measures be accessible to all groups affected by the restrictions)?		Yes. Measures are at community level which is the appropriate scale for the project. The measures, in particularly those that limit access, will apply a gender-sensitive perspective. For example, the milking stock which is usually left with women, will have special access to the exclosures or Olopololis. The beehive and milk production development target more specifically the women (which are traditionally involved in those activities). A gender specialist will be hired in the project in order to address gender issues in value chains development and conservation activities. The ecotourism development part of the project will include activities aiming to support bead craft marketing.	
h. Has a process been implemented or started to obtain consent from groups that are likely to be negatively affected by restrictions? Please describe the process (who has been consulted and how).		Defining rules will be part of the project, and such rules will be established by the communities themselves.	
4. Will/might the project require the acquisition of land for purposes other than the conservation objectives described above? E.g. for building (communal) infrastructure (development of water tanks, irrigation canals, access roads etc.). If yes, describe the legal status/ownership of the land that might be subject to land acquisition. If voluntary donations are considered, explain how it will be ensured that no pressure or coercion is involved.	Yes	Water harvesting methods or development of community farm could require agreements with land owners. Infrastructures will be done only if there is an agreement. Due to the communities dynamics we think that it will be not a problem.	
5. Has any form of resettlement, land acquisition or land use restrictions occurred prior to the project (e.g. the start of the design phase)? Was any of this undertaken or initiated in anticipation of or in preparation for the project?			
Conclusion of ESMS Reviewer on the Standard on Involuntary Resettlement and Access Restrictions			
Standard triggered? (Yes / No / TBD)	No	Likelihood of risk (1-5):	n/a
		Magnitude (1-5):	n/a

<p>What are the main risks and who are the main groups potentially affected? Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed? Have measures for avoiding impacts already been considered? Are they sufficient? What safeguard tools are to be prepared (e.g. Process Framework)? When would the tools need to be available (complete and accepted)?</p>	<p>Rangeland management practices promoted by the project are expected to increase the productivity of the land and as such have a beneficial impact for resource users in the long run. However, short-term impacts of restrictions on the livelihood of people who are dependent on these resources, in particular vulnerable groups, cannot be excluded. The Standard is not triggered, though, because the decisions on restrictions will be taken by the communities themselves.</p> <p>The social impacts of such restrictions should still be addressed by the project (as social impact and not under this standard); and it is acknowledged that project design already includes strategies (e.g. value chain development providing new income opportunities etc). The social impacts of such restrictions need to be addressed by the project (as social impact and not under this standard). It is acknowledged that project design already includes strategies (e.g. value chain development providing new income opportunities etc.), but it is not clear whether these measures can effectively mitigate potential impacts of all affected people. Hence, the ESMF should provide the following guidance:</p> <ul style="list-style-type: none"> • Demonstrate that decisions about use restrictions are not imposed but taken by the communities themselves (more precisely the resource users and rights holders); • Ensure that potential impacts on vulnerable members of the community whose livelihoods depend on the resources to be restricted are analysed; • In case impacts have been confirmed as significant, that measures are available to mitigate adverse impacts, if any, on the vulnerable members of the community.
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C2: Standard on Indigenous Peoples ¹⁹

	Project proponent		IUCN ESMS Reviewer
	<i>Yes, no, n/a, maybe</i>	<i>Answer question and describe how the risks are being assessed, avoided or managed</i>	<i>Comments, additional considerations</i>
1. Does the project site ²⁰ overlap with lands or territories claimed indigenous peoples, tribal peoples or other traditional peoples? If yes, answer questions a-k	Yes		
2. Even if indigenous groups are not found at the project sites, is there still a risk that the project could affect the rights and livelihood of indigenous peoples?. If yes, answer questions a-i			
<i>Answer only if you answered yes to 1 or 2 above.</i>			
a. Name the groups; distinguish, if applicable, the geographical areas of their presence (including the areas of resource use) and how these relate to the project's area of influence.		The southern rangeland project site overlaps with territory of the Maasai who inhabits not only southern Kenya but also northern and central Kenya as well as northern Tanzania. Maasai is the dominant ethnic group in the project area. There are very small numbers of other ethnic groups in the areas of Ewuaso Kedong, Keekonyokie and upper Suswa and Loita (Naroosura) – these are workers who have	

¹⁹The coverage of indigenous peoples includes: (i) peoples who identify themselves as "indigenous" in strict sense; (ii) tribal peoples whose social, cultural, and economic conditions distinguish them from other sections of the national community, and whose status is regulated wholly or partially by their own customs or traditions or by special laws or regulations; and (iii) traditional peoples not necessarily called indigenous or tribal but who share the same characteristics of social, cultural, and economic conditions that distinguish them from other sections of the national community, whose status is regulated wholly or partially by their own customs or traditions, and whose livelihoods are closely connected to ecosystems and their goods and services

²⁰ The project site is defined as the project's area of influence. This is often larger than the site where actual project activities are located as it considers the area impacted by the activities. For example, a project that intervenes in a PA through strengthening law enforcement will also impact groups that live just outside a PA but have historically hunted inside the PA, even before it was created.

		moved in to work on ranches of the Maasai in small scale crop production or are leasing land from the Maasai.	
b. What are the key characteristics that qualify the identified groups as indigenous groups? Do these groups identify themselves as indigenous? And how does the host country's Government refer to these groups?		<p>The Maasai are a pastoralist people, whose traditional territories stretch from the Rift Valley in Kenya across the Serengeti plains into Tanzania.</p> <p>The project site is inhabited by people that under international law are considered indigenous peoples. Based on their location in the dry lands, they are referred to as marginalized but there is no reference to them as minority.</p> <p>The Government of Kenya is yet to adopt the UN Declaration on the Rights of Indigenous Peoples and to ratify ILO Convention 169. However, the Government recognizes and adheres to the position of the African Commission on Human and Peoples' Rights (ACHPR) who argues that all Africans are indigenous to Africa in the sense that they were there before the European colonialists arrived. The Kenyan Constitution does address risks of marginalized communities and groups, though, and calls for procedures for affirmative action (Article 56); and the definition of marginalized groups include traditional people, indigenous communities maintaining a traditional lifestyle and livelihood as hunter or gatherer and pastoral persons and communities (being nomadic or a settled).</p>	
c. Explain whether communities have traditionally lived in the project site or whether there are groups or some households who have moved from their traditional area to the project site to be in or near a protected area for economic reasons. ²¹		These communities have traditionally lived in the project area.	
d. Is there a risk that the project affects their livelihood through access restrictions? While this is covered under the Standard on Involuntary Resettlement and Access Restrictions, if yes, please specify the indigenous groups affected. Distinguish between communities whose traditional resource use areas overlap with the PA, even before it was created, from those who have a recent history and presence there.	Yes	The project aims to support the Maasai communities to define land and natural resource management plans at community level. Rules will be defined at community level by the community itself. The project will not impose any restriction measures on the communities. It cannot be excluded, though, that there might be members in the communities who could be affected through access restrictions - please see explanations in section C1.	
e. Is there a risk that the project affects their livelihood in ways other than through access restrictions? E.g. by affecting their self-determination, cultural identity, values and practices, social cohesion, or by providing inequitable benefits?	No	<p>The community consultation process carried out during the field mission identified principles of intervention and potential activities. The objective was to ensure that project design is adapted to the needs of the communities and will not result in unanticipated negative impacts. These consultations led to a review of some project components, particularly the value chain dimension, in order to give more importance to the community as such. For this reason, the project includes a site selection and activity definition phase based on more comprehensive discussions with the communities concerned.</p> <p>Of course the representativeness of the people met in the field can be questioned. However, we paid particular attention to cross-</p>	The ROAM methodology includes a step to analyse where restoration is socially, economically and ecologically feasible. However, this might not be sufficient to fully understand the potential losses faced by vulnerable groups. Therefore a dedicated social analysis should be included in activity 2.1 to identify vulnerable groups and asses their dependency on natural

²¹ It is important to bear in mind that the Standard is seen to generally apply to the community and not to an individual that may have left the community.

		checking data, having group discussions and individual. All discussions were conducted in local languages to ensure a good understanding of the participants.	resources and impacts from restrictions (to be explained in the ESMF).
f. Does the project intend to promote the use of indigenous peoples' traditional (ecological) knowledge?	Yes	The project plans to remobilize traditional knowledge, particularly in the area of pasture management. The tourism component of the project will also promote the bead craft of Maasai communities.	
g. Are any indigenous groups living in voluntary isolation? If yes, how does the project respect their rights (paying attention to national laws on the matter) and avoid any negative impacts?	No		
h. Explain whether and how legitimate representatives of indigenous groups have been consulted to discuss the project and better understand potential impacts upon them? Has a process been started or implemented to achieve their free, prior and informed consent (FPIC) to activities that might affect them?		<p>Focus group and key informant interviews have been held in different sites of the project area. All the sites are inhabited by Maasai people and inhabited only by Maasai. So meetings have been exclusively held with Maasai. Participants were selected in close collaboration with SORALO (Southern Rangelands Association of Land Owners) an association of land owners in the area, an umbrella organization bringing together all Maasai groups ranches in the project site. They are a legitimate representative organization of their members. Consultations were held with community chiefs, member of community group, member of WRUA or CFA, member of cooperative, county government, NEMA officials. In other places, they individuals were randomly selected.</p> <p>Meetings with communities have been held to discuss in Maasai language the opportunity to implement a project and the content of the project. Our main concern was to be sure that activities defined within the project will match the needs and expectations of the communities. However, at this stage, no sites have been selected for the implementation. One of the first activities of the project will be to select the sites based on the ROAM assessment.</p>	
i. Explain whether opportunities are considered to provide benefits for indigenous peoples? If yes, is it ensured that this is done in a way agreed with them and is culturally appropriate and gender inclusive?		The high level activities have been defined through a consultation process with the Maasai communities' representatives; the details will be included when developing the Participatory and gender-responsive forest and rangeland landscape restoration investment action plans. Involving the communities in this process is expected to ensure that activities with provide culturally appropriate and gender inclusive benefits.	

Conclusion of ESMS Reviewer on the Standard on Indigenous Peoples

Standard triggered? (Yes / No / TBD)	Yes	Likelihood of risk (1-5):	2	Magnitude (1-5):	3
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What are the main risks and who are the main groups potentially affected? Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed? Have measures for avoiding impacts already been considered? Are they sufficient? What are the safeguard tools to be prepared (e.g. IPP)? When would the tools need to be available (complete and accepted)?

The standard is triggered as project activities take place on indigenous people land or territory. The Standard requires effective and meaningful consultation with indigenous peoples representatives, that social risks and impacts are properly assessed and potential adverse impacts avoided or measures are identified through a consultative process that minimise adverse impacts and/or provide adequate compensation. These requirements will be ensured by engaging SORALO, the representative organization of Maasai group ranches, and representatives of the local communities in the identification of the rangeland restoration sites (through the landscape restoration opportunity assessment process, ROAM) and in the development of the forest and rangeland landscape restoration investment action plans. The social analysis undertaken in parallel to the ROAM process will ensure that vulnerable groups within the indigenous communities are identified, potential impacts are assessed and, where relevant, mitigation measures are developed to be included in the action plans. Guidance on the social analysis should be provided in the ESMS.

These planning tools and processes will ensure that the identified activities will provide culturally appropriate and gender inclusive benefits and that their rights related to cultural heritage and values, traditional knowledge, practices, customary institutions are fully respected and supported. Therefore, and in light of the fact that the Maasai are the dominant ethnic group in the project site and risks of marginalization can be excluded, there is no need for affirmative action through an Indigenous Peoples Plan. The restoration plans will be validated by the communities in a process that follows the principles of FPIC. The screening of the sub-projects will deliberate about the potential need for further consultations following FPIC with regards to other project activities that will be decided after site selection and finalizing activity planning at the local level.

C3: Standard on Cultural Heritage²²

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, maybe	Answer question and describe how the risks are being assessed, avoided or managed	Comments, additional considerations
1. Is the project located in or near a site officially designated or proposed as a cultural heritage site (e.g., UNESCO World Cultural or Mixed Heritage Sites, or Cultural Landscapes) or a nationally designated site for cultural heritage protection? if yes, answer a-c below	No		
2. Does the project site include important cultural resources such as burial sites, buildings or monuments of archaeological, historical, artistic, religious, spiritual or symbolic value? if yes, answer a-c below	No		
3. Does the project area site include any natural features or resources that are of cultural, spiritual, or symbolic significance (such as sacred natural sites, ceremonial areas, or sacred species)? if yes, answer a-c below	Yes	Ologesailie site, a geological formation containing a group of Lower Paleolithic archaeological sites. This site is the only one formally identified in the project area (and not the project sites). It won't be impacted by the project. Mt. Suswa is regarded as a culturally important site for the Maasai. The Maasai come here	

²² Cultural heritage is defined as tangible or intangible, movable or immovable cultural resource or site with paleontological, archaeological, historical, cultural, artistic, religious, spiritual or symbolic value for a nation, people or community, or natural feature or resource with cultural, religious, spiritual or symbolic significance for a nation, people or community associated with that feature.

		at least once each year for community prayers. Lake Kwena is an ecologically important site as it is a breeding site for Vultures.	
a. Will the project involve development of infrastructure (e.g. roads, dams, slope restoration, landslides stabilisation) or construction of buildings (e.g. visitor centre, watch tower)?	Yes	In a few cases, there may be construction of catchment roofs and structures. Water pans are some of the strategies for rain water harvesting.	
b. Will the project involve excavation or movement of earth, flooding or physical environmental changes (e.g., as part of ecosystem restoration)?	Yes	Very minimal movement of earth to construct water pans, to fill up gullies and construction of rain catchments on rocky areas	
c. Is there a risk that physical interventions described in items a. and b. might affect known or unknown (buried) cultural resources?	No		While it is not very likely that there is a risk of damaging physical cultural resources, as the restoration activities and sites are not identified yet, this cannot be fully excluded. Guidance to be provided in the ESMF about the need to make chance find procedures available to the relevant parties during constructions work.
4. Will the project restrict local users' access to cultural resources or natural features/sites with cultural, spiritual or symbolic significance?	No	With confidence	
5. Is there a risk that project activities might affect in-tangible cultural resources such as values, norms or practices of local communities?	No	We have mentioned that seasonal migration and grazing will be maintained or encouraged. We do not see any other cultural practice that will be affected by the project. Extent of the mobility may not change as the community is quite sedentary already.	
6. Will the project promote the use of or the development of economic benefits from cultural heritage resources or natural features/sites with cultural significance to which local communities have legal (including customary) rights?	No	The project will only promote the traditional knowledge of Maasai in terms of rangeland management and bead craft.	While risks seems unlikely, guidance should still be provided in the ESMF as the ecotourism activities and the potential cultural features that might be promoted are not known.

Conclusion of ESMS Reviewer on the Standard on Cultural Heritage

Standard triggered? (Yes / No / TBD)

Yes

Likelihood of risk (1-5):

3

Magnitude (1-5):

2

What are the main risks and who are the main groups potentially affected? Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed? Have measures for avoiding impacts already been considered? Are they sufficient? What are the safeguard tools to be prepared (e.g. Chance Find procedures)? When would the tools need to be available (complete and accepted)?

There is a low risk of encountering physical cultural resources when carrying out constructions work (e.g. water infrastructure). Albeit such infrastructure will be of small size, for precautionary reasons chance find procedures will need to be developed and made available to the parties involved in the construction work.

The project does not intend to restrict access to cultural sites, but recognizes that the development of ecotourism opportunities for generating income for the communities may involve the use or development of economic benefits from cultural heritage which will require FPIC from the respective rights holders. As such use will only be decided during the project after site selection and finalizing activity planning at the local level, guidance has been provided in the ESMF.

C4: Standard on Biodiversity Conservation and Sustainable Use of Natural Resources

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, maybe	Answer question and describe how the risks are being assessed, avoided or managed	Comments, additional considerations
1. Is the project located in or near areas <ul style="list-style-type: none"> legally protected or officially proposed for protection including reserves according to IUCN Protected Area Management Categories I - VI, UNESCO Natural World Heritage Sites, UNESCO Biosphere Reserves, Ramsar Convention on Wetlands recognised for their high biodiversity value and protected as such by indigenous peoples or other local users which are not covered in existing protection systems but identified by authoritative sources for their high biodiversity value²³ 	Yes	Lake Magadi, Kwenia, South Nguruman (Loite Hills) in Kenya, Lake Natron in Tanzania. These sites are identified in the world database of Key Biodiversity Areas as sites of particular importance. Several major conservancies are located in the project area: Shompole, Mount Suswa, Olkiramatian, Ologesailie The project area is generally considered as a place with an high biodiversity value. It acts as a dispersal corridor for wildlife and hence allowing for the free movement of wildlife between the Maasai Mara conservation area and the Amboseli/Kilimanjaro wildlife conservation areas.	
2. If there are any project activities proposed within or adjacent to areas high biodiversity value or critical habitats described above , is there a risk of causing adverse impacts to biodiversity and the integrity of the ecosystems? Consider activities such as infrastructure works (e.g. watch tower, facilities, access roads, small scale water infrastructure) or ecotourism activities and impacts from inadequate waste disposal, disturbance of nesting sites, slope erosion through hiking trails etc. Consider both construction and use phases?	Yes	By organizing the communities, increasing their capacities to develop economic activities, supporting the development of value chains, etc. the project could result in negative impacts on biodiversity. Examples: development of water points for livestock might increase the number of livestock triggering overuse of water resources, overgrazing and erosion; ecotourism could increase pressure on the environment. The expert in ecotourism will provide training at community level in order to avoid environmental and social impacts.	Guidance to be provided by the ESMF
3. Is there a risk of significant adverse impacts on biodiversity outside above described areas (PA etc.), through infrastructure development, plantation development (even small scale) or other activities e.g. through the removal of vegetation cover, creation of soil erosion and/or debris deposition downslope, or other disturbances? Consider both construction and use phases.	Yes	Water harvesting methods such as dams may cause erosion by modifying sediments transportation.	While the risk seem to be minor given the small size of the water infrastructure, however, as the sites and detailed activities are not know, guidance needs to be provided by the ESMF
2. Is there a risk that the project affects areas of high biodiversity value outside above described areas (PA etc.), e.g. by procuring natural resource commodities (e.g. timber used for watch towers etc.)? If yes, explain whether appropriate industry-specific sustainability verification practices be used.	No		
3. Will the project introduce or use non-native species (flora and fauna), whether accidental or intentional? Consider activities such as reforestation, erosion control or dune stabilisation or livelihood	No	The project will only promote the plantation of native species.	The use of non-native species with invasive characteristics

²³ Areas important to threatened species according to IUCN Red List of Threatened Species, important to endemic or restricted-range species or to migratory and congregatory species; areas representing key evolutionary processes, providing connectivity with other critical habitats or key ecosystem services; highly threatened and/or unique ecosystems (e.g. to be determined in future by the evolving IUCN Red List of Ecosystems); areas identified as Key Biodiversity Areas (KBA) and subsets such as important Bird and Biodiversity Areas (IBAs), important Plant Areas (IPAs), important Sites for Freshwater Biodiversity or Alliance for Zero Extinction (AZE) sites.

activities (e.g. aquaculture, farming, horticulture etc.). If yes, explain how the risk of the species developing invasive characteristics is managed?			need to be explicitly excluded – to be specified in the ESMF.
4. Is there a risk that the project might create other pathways for spreading invasive species (e.g. through creation of corridors, import of commodities, tourism or movement of boats)?	No		
5. Is there a risk that the project negatively affects water dynamics or water flows through extraction, diversion or containment of surface or ground water (e.g., through dams, reservoirs, canals, levees, river basin developments, groundwater extraction) or through other activities and as such affects the hydrological cycle, alters existing stream flow and/or reduces seasonal availability of water resources?	Yes	Water harvesting methods will be promoted and sand dams may be created. Boreholes and irrigation could also be included in the restoration plans. If implemented without any control, these methods could negatively affect water flows. That is why a particular attention will be paid to the strengthening of local units involved in water management.	As sub-projects are not known, guidance to be provided in the ESMF
6. Is there a risk that the project affects water quality of surface or groundwater (e.g., contamination, increase of salinity) through irrigation/ agricultural run-off, water extraction practices, influence of livestock or other activities?	Yes	Water use by value chain activities could affect water quality. Good agricultural practices (CSA and organic production) will be promoted through extension services. Capacity building at local level will also aim to mitigate these issues.	As sub-projects are not known, guidance to be provided in the ESMF
7. Will the project involve or promote the application of pesticides, fungicides or herbicides (biocides)? Also consider the use of integrated pest management.	No		
8. Will the project involve handling or utilization of genetically modified organisms /living modified organisms?	No		
9. Does the project promote the use of genetic resources from natural habitats (e.g. harvesting, market development), and if so, what are the measures for access and benefit-sharing relating to these?	No		
10. Is there a risk that the project could give rise to an increase of incoming migration and population increase, which could put a strain on the existing natural resource base?	No	There is of increase in livestock population which is referred to already above. Incoming migration and population increase is not likely.	
11. Could the project result in noise and vibration from construction and maintenance equipment, traffic and activities, which may disturb sensitive fauna receptors, including underwater noise impacts on fish and marine mammals?	Yes	Construction of infrastructures may result in noise and vibration but the small size of the infrastructures to build and consequently the limited duration of the construction period would limit the impact.	This is considered a very a minor risk.
Conclusion of ESMS Reviewer on the Standard on Biodiversity Conservation and Sustainable Use of Natural Resources			
Standard triggered? (Yes / No / TBD)	Yes	Likelihood of risk (1-5):	Magnitude (1-5):
<i>What are the main risks? If possible, indicate probability and magnitude of impacts. Are assessments required to better understand the impacts and identify mitigation measures? What specific topics are to be assessed? Have measures for avoiding impacts already been considered? Are they sufficient? What are the safeguard tools to be prepared (e.g. Pest Management Plan, Protocol for Species Selection)? When would the tools need to be available (complete and accepted)?</i>		3	2
		The Standard is triggered as some risk issues have been identified, including the risk of increasing pressure on natural resources or water sources, risks for water quality and impacts on water flows. As the project sites and activities have not been defined in detail, the ESMF will need to provide guidance to ensure that these risks are checked as part of the screening of the sub-projects.	

D. Integrating ESMS Principles in Project Design

The below table reviews the project and its design process on adherence to the ESMS Principles. The principles are described in the ESMS Manual. Please note that the Guidance Note on Stakeholder Engagement²⁴ represents a new policy provision and delineates further requirements for consultation and involvement of stakeholder during project design and implementation.

	Project proponent		IUCN ESMS Reviewer
	Yes, no, n/a, maybe	Answer question, provide further detail where relevant	Comments, additional considerations
1. Has a Stakeholder Analysis been done and documented identifying a project's key SH, assessing their interest in the project, ways in which they may influence the project's outcomes and how they might be impacted by project activities (positively or negatively)?	Yes		
2. Does the analysis differentiate between women and men, and along key axes of social differentiation, where relevant?			
3. Has information about the project and potential risks (ESIA, ESMP) been disclosed ? If yes, indicate the sites. If not, explain how and when this will happen.			The ESMF will be disclosed prior to project approval
4. Have consultations been held with relevant groups to discuss the project concept and risks? Were consultations conducted in a meaningful and culturally appropriate way? Provide details about the form of consultations and the groups involved.	Yes	<p>The stakeholder consultation was carried out in four stages. 1) During the first mission public, private actors and NGO likely to participate in the project were met individually. During these interviews, the context of the project and its objectives were presented. Discussions then focused on feedback on similar projects, identification of ongoing projects, types of activities to be included, recommendations for the approach, etc.</p> <p>2) A workshop was held on 1 November to present the concept of the project, give a feedback on the individual meetings held during the inception mission and mobilize collective intelligence around the definition of the project content. A participatory approach (similar to a Metaplan approach) was used during the workshop.</p> <p>3) During two weeks of mission, focus groups were organized in the project area with potential beneficiaries. These focus groups were conducted with representative members: community leaders, members of Community Association Forest, Water Resources User Association, cooperatives, etc. Pastoralists and agropastoralists were met. The objective was to present the project and discuss with them the potential content of the project, main problems they are facing, actions that could help to solve these problems. These focus groups were supplemented by individual random interviews to cross check information. All interviews were conducted in the Maasai language. 86 people (37 women) have been met</p>	

²⁴ Available at www.iucn.org/esms

		during the focus groups. During the two weeks of mission, Counties' Departments were also consulted.	
5. Have women and men been provided equal opportunities in terms of participation and decision-making throughout the identification and design of the project? Have provisions been made to ensure the same for implementation, monitoring and evaluation of the project? Please provide details.	Yes	Almost all focus groups included women. Some meetings were held only with women to encourage expression, although the discussions showed that they were easily expressed in the presence of men.	
6. Has a gender analysis , socio-economic assessments or the equivalent been applied to inform gender-responsive design, implementation, monitoring and evaluation	Yes	See: Gender Analysis & Gender Action Plan	
7. While gender risks have been covered in section B, briefly describe how the project is likely to improve gender equality and women's empowerment .		By promoting beehives, milk production and access to the market, the project will enhance the economic and social benefits to women. By increasing access to water and promoting the use of improved cook stoves, it benefits socially to the women and benefit to the environment.	
8. Have vulnerable groups such as disadvantaged or marginalized people been consulted or stakeholders that might be negatively affected? Please provide details about the groups, the consultations and results of the consultations.	Yes	Women and youth are somewhat disadvantaged in terms of access to resources and less involved in decision-making. They have been consulted during the field mission. Another groups considered vulnerable are charcoal burners. However, due to the illegality of their activity it was not possible to exchange with them. Consultations will be carried out as part of the social assessment under activity 2.1	
9. Is the project in full compliance with laws and regulations of the host country incl. those implementing obligations under international laws (incl. provisions for impact assessment, disclosure and consultation)? Are relevant licenses or permits available?	Yes	Due to the small size of the activities, it is not expected that they will trigger an ESIA or formal licensing. However, the sub-projects will be screened by a safeguard expert to ensure full compliance with laws and regulations of Kenya. See ESMF for details.	

Conclusion of ESMS Reviewer

Are ESMS requirements on stakeholder engagement, disclosure and grievance fulfilled to satisfactory level? What additional actions need to be carried out and by when? What actions to be implemented during the project should be included in the ESMP or the Stakeholder Engagement Plan?

Some requirements are not fully met at this stage, these have been delineated in the ESMF