

The Nairobi-Nakuru-Mau Summit Highway PPP (the “NNM Project” or “the Project”) is a project to be developed under a PPP framework supported by the World Bank in Kenya through the Infrastructure Finance and Public Private Partnerships Project (P121019). It is a brownfield expansion and upgrade of an inter-urban highway system that has been tendered pursuant to a 30-year design, build, finance, operate, maintain and transfer contract with the Kenya National Highway Administration (“KeNHA”). The Project involves:

- Widening of 175 km of the A8 highway between Rironi and Mau Summit and turning it into a four-lane dual carriageway, including operation and maintenance
- Strengthening of 58 km of the A8-South highway between Rironi and Naivasha, including operation and maintenance

The proposed World Bank contribution is an Investment Project Finance (IPF) operation (P165545) utilizing an IDA guarantee product. The IDA guarantee is proposed to be structured as a payment guarantee and possible loan guarantee. The payment guarantee will backstop certain payment obligations of the GoK and/or KeNHA

The NNM Project company is Rift Valley Highway Limited (RVHL), which is a consortium led by Vinci Concession (a construction, engineering and concessions firm in the world operating in over 100 countries) and Meridiam, a global investor and asset manager, both headquartered in Paris.

Through this Early Disclosure, KeNHA and the World Bank provide access, early in its environmental and social assessment process, to the Draft Environmental and Social Impact Assessment (ESIA) documents to meet disclosure requirements. These documents have been prepared by RVHL and should not be taken as an indication that KeNHA has approved them or that the World Bank has completed its review of the potential financing. The purpose of this Early Disclosure is to enhance the transparency of the World Bank’s activities with reference to the Project regarding its potential significant adverse environmental and social risks and impacts. Any project documentation or data included or attached herein has been prepared by RVH and authorized for public release by KeNHA.

The Draft ESIA is structured around Valued Environmental Components (VECs). The VECs are defined and then used to organize the baseline, and to assess impacts and define mitigation measures. A total of 18 VECs are defined, plus an additional 23 environmental subcomponents. Several key issues are not sufficiently addressed. The key issues requiring further coverage in the Final ESIA include the: Relation to Performance Standards and the EHS Guidelines; Impacts on the town of Nakuru; Access along the Road; Railway impacts that operation of the dry port might have on the Highway; Additional Resettlement; Impacts of two large greenfield quarries and the management of impacts on biodiversity.

The Environmental and Social Management Plan (ESMP) also requires additional work to: Further clarity on roles and responsibilities; How and what obligations will be passed down to the level of the contractors who will perform the works; How and what obligations will be passed down to the level of the contractors who will perform the works; Adding a draft RVH (concessionaire) ESMS and: An Annex of Environmental, Social, Health and Safety (ESHS) requirements that the concessionaire will pass on to Contractors to meet PS requirements and EHS Guidelines.

As for social impacts, the socio-economic and environmental impacts during construction and after construction for the sections where there will be overpasses need to be detailed and described in the ESIA. The stakeholders’ engagement process for these sections needs to be undertaken and well documented covering all issues raised by the stakeholders. Furthermore, the

social risk management legal and institutional analysis needs to be improved. Issues of labor need to be further developed. Although a GBV Action Plan has been proposed the ESMP should clarify who will be responsible for setting up a referral pathway for the GBV survivors. An analysis of the social risks has been done; however, it needs to clarify what the cost estimates for the mitigation measures will be. Social staff and Community liaison officers to support the process should be proposed in the ESMP. Finally, as it is proposed that the material sites will be acquired on a willing buyer and willing seller, the ESIA should clarify that national NEMA requirements will be met (ESIA/ESMP) and written agreements will be made with the landowners.

The disclosure of the ESIA documents should not be construed as presuming the outcome of the World Bank's review of the potential investment or the decision of its Board of Directors. An updated final version of the ESIA will be reviewed and cleared by the World Bank and will be disclosed before 1 April 2022, prior to Project Appraisal. In addition, prior to any consideration of the investment by the World Bank's Board of Directors, the World Bank will disclose the Environmental and Social Review Summary (ESRS).