

**COMBINED PROJECT INFORMATION DOCUMENTS / INTEGRATED
SAFEGUARDS DATA SHEET (PID/ISDS)
APPRAISAL STAGE**

Report No.: PIDISDSA21078

Date Prepared/Updated: 27-Feb-2017

I. BASIC INFORMATION

A. Basic Project Data

Country:	Kenya	Project ID:	P156634
		Parent Project ID (if any):	
Project Name:	Water and Sanitation Development Project (P156634)		
Region:	AFRICA		
Estimated Appraisal Date:	30-Jan-2017	Estimated Board Date:	25-Apr-2017
Practice Area (Lead):	Water	Lending Instrument:	Investment Project Financing
Borrower(s):	Government of the Republic of Kenya		
Implementing Agency:	Ministry of Water and Irrigation		
Financing (in USD Million)			
	Financing Source		Amount
	BORROWER/RECIPIENT		30.00
	International Development Association (IDA)		300.00
	IDA Grant		0.00
	Financing Gap		0.00
	Total Project Cost		330.00
Environmental Category:	B - Partial Assessment		
Appraisal Review Decision (from Decision Note):	The review did authorize the team to appraise and negotiate		
Other Decision:			
Is this a Repeater project?	No		

B. Introduction and Context

Country Context

Although Kenya has experienced strong economic growth in recent years, it has yet to undergo a structural transformation. Growth of gross domestic product (GDP) averaged 5.3 percent during 2004–14. In 2014, the rebasing of Kenya's national accounts resulted in an upward revision of the GDP per capita and reclassification of Kenya as a lower-middle-income country. In 2015, GDP grew by 5.6 percent, driven primarily by public investment in infrastructure, higher private-sector investment, and strong consumer demand. Kenya's GDP is projected to grow by 6 percent in 2016, exceeding the regional average for the eighth consecutive year. Despite overall economic growth, agriculture remains an important sector of the economy, contributing 30 percent of GDP in 2015, up from 26 percent in 2011. Manufacturing accounts for about 10 percent of GDP down from 12 percent in 2011. Services account for about 50 percent of GDP. Kenya's economic growth is driven mainly by services (predominantly based in cities), especially financial services (8.7 percent), information and communication (7.3 percent), and transport and storage (7.1 percent) sub-sectors. However, despite the strength of Kenya's private sector, the economy continues to perform below its potential due to infrastructure bottlenecks, a poor and deteriorating business environment, and outdated agricultural and trade policies. In the coming decades, the structural transformation of the Kenyan economy is expected to continue, coupled with rapid demographic growth and increasing population and economic density.

Poverty remains high. Economic growth has created a growing middle class, but poverty rates remain high. Some 42 percent of the population lives below the national poverty line, the vast majority in rural areas. Poor households are more likely than the non-poor to depend on income and consumption from crops and livestock.

Economic growth has been accompanied by rapid urbanization, leading to growing gaps in service provision. In 2011, about 30 percent of the Kenyan population was residing in urban areas and the total urban population was estimated to be about 15.2 million people. It is forecasted that in 2030 the population of Kenya will have reached about 61 million people, of which 30 million will reside in cities. But urban services are not keeping pace with urban population growth, with demand for services far outstripping supply in most urban areas. Authorities are unable to keep pace with the growing demand for services because of inadequate financing for capital investments; insufficient capacity for planning, operating, and maintaining urban infrastructure and services; and institutional fragmentation.

Economic growth and urbanization are placing increasing pressure on Kenya's limited water resources. Kenya is classified as a chronically water scarce country in absolute and relative terms. The country's annual freshwater availability of 526 cubic meters per capita places it in the bottom 8 percent of countries globally. Over 80 percent of the country is comprised of arid or semi-arid lands. A further complicating factor is that approximately 54 percent of Kenya's water resources are shared with neighboring countries. Severe degradation of the country's key water catchment areas, due primarily to deforestation and unsuitable agricultural practices, has exacerbated the situation. At the subnational level the spatial mismatch between water availability and rising demands is in many cases even more extreme, with areas around the major cities of Nairobi, Mombasa, and some western Kenya urban centers most critically water stressed.

Kenya's urbanization is taking place within a major shift toward political, fiscal, and administrative devolution. The 2010 Constitution provides for two autonomous but interdependent levels of government: national and 47 county governments with mainly elected assemblies, elected governors, and governor-appointed cabinet members ratified by the assembly. The constitution eliminated the previous third-tier of government, the urban and rural local authorities and transferred their revenues and functions to the county governments. With a guaranteed unconditional transfer of national revenue, called the equitable share, the county governments are expected to address local needs for devolved services, including water and sanitation services. The institutional arrangements in the context of devolution are still evolving, including intergovernmental structures and mechanisms for intergovernmental cooperation and transfer of resources to deliver on policy priorities. For example, some counties have expressed a desire to work with the existing water services boards, while others are developing alternative arrangements for cross-county infrastructure development.

Sectoral and institutional Context

The Kenya Water Act 2002 introduced important reforms in the sector. It separated the functions of water resource management, asset ownership, water service delivery, policy, regulation, and financing; provided for the ring-fencing of revenues within the sector; and established a framework for utilities and other service providers to move toward cost-reflective tariffs. It established eight water services boards (WSBs) owned by the national government to create assets in their respective regions. It created commercially-oriented water services providers (WSPs) to be responsible for service delivery under a contract with their WSBs. The 2002 Water Act also established an independent Water Services Regulatory Board (WASREB) tasked with reviewing and approving tariff applications and with monitoring and reporting on sector performance.

The 2010 constitution brought major reform to the country's institutional set-up and thus a need for new water legislation. The constitution shifted many of the functions formerly held by national ministries to county governments, leaving ministries (including the Ministry of Water and Irrigation) primarily with policy making, regulatory, and capacity building roles. County governments are now responsible for providing water and sanitation services in the counties (through their WSPs), protecting the environment, implementing county-specific public works, including for storm water management. The current WSBs (which will be transformed to water works development agencies) will remain responsible for developing inter-county bulk water systems, but not for county-specific infrastructure. The Water Act 2016, which was approved in September 2016, brings the water legislation in line with the constitution and clarifies the roles of the two levels of government and the water institutions. There is also a need to develop a new water policy to reflect the changes introduced by the constitution. The Bank through the ongoing Kenya Water Security and Climate Resilience Project (KWSCR) is supporting the development of this policy and the operationalization of the Water Act 2016 through support to relevant water sector institutions.

Provision of urban water and sanitation services has not kept pace with Kenya's high urbanization rates. The urban population rose from about 4 million in 1990 to over 15 million in 2011. Over the same period, the proportion of the urban population with access to improved water sources declined from 92 percent to 82 percent, while the proportion with access to improved sanitation (excluding shared sanitation) increased by only 5 percentage points from 26 percent to 31 percent. Today, only about 18 percent of the urban population is served by a

sewerage system. Existing wastewater treatment facilities operate at very low efficiencies (about 16 percent of design capacity for 15 plants assessed in 2010), leading to discharge of untreated effluents. The wastewater in the coastal area is often discharged through inadequate stormwater systems, resulting in septic water and sludge spilling into the environment, creating a health hazard for the residents and a threat to the coastal environment.

Achieving universal access to improved water and sanitation requires significant capital expenditure. The National Water Master Plan 2030 estimates that about US\$14 billion in investment in water supply and US\$5.4 billion in urban sewerage infrastructure are needed over the next 15 years. However, it also points to shortfalls of 57 percent for investment in water supplies and 94 percent for urban sewerage. Given that development partners now contribute more than half of financing, a sharp increase in mobilizing new sources of financing, including commercial financing for commercially-viable investments, will be required. Thus, achieving the SDG of universal access to water and sanitation will require strong institutions, huge investments, tapping different sources of financing including commercial financing, much improved operational efficiencies, and innovative technologies.

The World Bank is supporting the development of water and sanitation services in Kenya, some of them supported by other donors. Currently, the World Bank is supporting the Kenya Water Security and Climate Resilience Program, the Coastal Region Water Security and Climate Resilience Project (CRWSCR); the Water and Sanitation Services Improvement Project (WaSSIP), and the Kenya Informal Settlements Improvement Project (KISIP). It is also supporting two programs financed with grants from the Global Partnership on Output Based Aid (GPOBA): the Nairobi Sanitation Project, and the Urban Water and Sanitation OBA Fund for Low Income Areas. Collectively, these are financing major investments in water storage, water and wastewater treatment, trunk water and sewerage infrastructure, distribution networks, and last mile connections. The Water and Sanitation Development Project (WSDP) builds on and scales-up the achievements of the ongoing projects. Several development partners are co-financing the Bank-led projects or supporting complementary activities. The French Development Agency (AFD) is co-financing WaSSIP and KISIP. The German KfW Banking Group (KfW) is providing parallel financing for WaSSIP and KWSCR.

The World Bank and development partners are supporting the development of commercial financing for delivery of water and sanitation services. With support of the Bank, WASREB has introduced a creditworthiness index assessing the financial performance of the larger WSPs and has created and delivered tool kits and best practices on financial management to county governments, WSPs, and local lenders to facilitate access to commercial finance. The Bank has also provided technical assistance to help WSPs prepare investment plans and identify bankable projects and to assist banks in evaluating proposals from WSPs. USAID has established partial credit guarantees for three local banks lending to WSPs. The government with support from the Embassy of the Netherlands is currently establishing a pooled bond facility to allow WSPs to tap longer term resources from pension funds and insurance companies. By pooling risk, the intention is to increase the volume of commercial financing available, make more efficient use of credit enhancements and encourage a larger pool of WSPs to explore commercial financing. Design work on the pooled fund is continuing with a tentative offering being explored for the fourth quarter of fiscal 2017.

The coastal region (which serves as a transport hub and an important tourist destination) is a

vital economic region for Kenya and for all of east Africa. However, the coastal counties face serious challenges in providing water supply and sanitation services to their residents. Mombasa County, which is home to nearly 1 million people, has a huge water deficit of over 100,000 cubic meters per day and non-revenue water of over 50 percent. The coastal region relies on a bulk water system which connects four main sources—(the Baricho wellfield (Kilifi county), Mzima springs (Taita Taveta county), and Marere Springs and Tiwi boreholes (Kwale county)—(through about 400 kilometers of pipeline. Under WaSSIP and a project financed by the AFD, all four water sources were rehabilitated to sustain and slightly increase the yield of these sources. However, major new source development is needed to address the water shortage.

The Bank is financing the projects identified in the water resources masterplan for the coastal region as the first priorities. WaSSIP is supporting improvements in the operations of the Baricho wellfield and rehabilitation of the pipelines serving Malindi, Kilifi, and Mombasa, which were identified as immediate measures in the masterplan. However, these measures are small and will bring only an additional 28,000 cubic meters per day to these towns. The KWSCRIP is financing the construction of the Mwache dam, which is the second priority identified in the masterplan. This is a multi-purpose dam (irrigation and water supply) and is expected to supply 186,000 cubic meters per day to WSPs in the coastal counties once fully operational (detailed designs for the dam are expected in late 2017, and construction is expected to be complete in June 2022, with full operations to begin a year later). At the time the project was approved, resources from the International Development Association (IDA) were not available for the downstream infrastructure (water treatment, bulk water conveyance and distribution networks). However, the Bank made a commitment to finance the downstream infrastructure once funds become available. The proposed WSDP will support the downstream infrastructure for Mwache dam, in addition to priority investments in water and sanitation in other coastal urban areas.

When Mwache dam becomes fully operational, the coastal region will have sufficient water supply sources for the medium term. The water from Mwache dam will serve mainly Mombasa, allowing water from the other current sources to serve other urban areas through the existing bulk water system. However, the distribution networks in all the urban areas of the coastal region are dilapidated and will not be able to cope with the increased network pressure. This is why the Bank when committing to support the construction of the Mwache dam also committed to support the rehabilitation of water supply and sanitation networks in the entire coastal region, not only in Mombasa.

The ongoing WaSSIP is already financing two service contracts for the bulk water service provider, which has substantially increased the efficiency of the operation. The bulk water system is currently operated by Coast WSB, but negotiations between the coastal counties and the national government are underway to establish the most efficient and effective mechanism to provide these services in devolved systems. Ultimately, it is expected that the two levels of government will agree on a joint authority to manage cross-county operations as provided for in the 2010 constitution and the Water Act 2016. The Water and Sanitation Program has been supporting the dialogue between the national and county governments and will continue to do so.

The World Bank is supporting the government—(s initiative to boost the economic performance of its north and northeastern counties. These counties—(which comprise Mandera, Wajir, Isiolo, Marsabit, Garissa, Tana River, Lamu, Turkana, West Pokot, and Samburu—(have been historically underserved. Some 80 percent of the residents of the region are living in poverty and

have poor access to basic services. Frequent droughts create additional vulnerabilities for the population, 90 percent of whom rely on livestock, large numbers of which can die during droughts. Climate change poses an additional threat to the already fragile region. The World Bank has recently launched the Northeastern Development Initiative (NEDI) which is focused on transformative and integrated infrastructure investments in energy, transport and water and aims to connect the region to national and global markets.

WaSSIP is financing a groundwater study for the Merti aquifer which will develop a groundwater management plan for sustainable use of the aquifer. The results of the aquifer study will also inform the ongoing feasibility study for water supply for Wajir town and the host community around the Daddab camps. The aquifer covers a large part of the region including Isiolo, Garissa and Wajir counties and extends beyond the Kenya-Somalia border into Somalia. The study is currently assessing the entire aquifer and developing a plan for development, monitoring, protection, and overall sustainable management of the aquifer.

The WSDP will support investments in water and sanitation for selected priority areas in the northeastern counties. The Council of Governors of the northeastern counties together with the national government have identified Wajir town and Dadaab host communities as the first priorities, as they are facing critical water supply and sanitation challenges due to pollution and depletion of the water resources upon which they rely.

Wajir town is the main urban center and headquarters for Wajir county, with a population of about 100,000 inhabitants. The town is experiencing rapid population growth, with commercial developments and more people settling within the core urban center and the peri-urban areas due to infrastructure development and improved service provision within the town since the establishment of the county government. Wajir is a water deficient county with no perennial rivers. The town has a shallow water table which is diminishing and is also being contaminated with untreated waste water. The main source of water for Wajir town is groundwater from a shallow aquifer as low as five meters below the ground. Most of the town's households rely on shallow hand-dug wells within their compounds from where they draw water through simple systems like containers attached to ropes. Wajir town has an estimated 20,000 shallow wells scattered in the entire town, of which only about 1,235 are protected and about 10 percent have dried up. Water from these shallow wells is saline and has also shown bacteriological contamination due to lack of a proper sanitation system for the town. As a result, there are frequent cholera outbreaks, particularly during the rainy seasons.

Garissa county hosts a large refugee camp at Dadaab, with over 340,000 people. In addition, about 160,000 inhabitants live within a 50 kilometer radius of the five refugee camps. Of these, about 60,000 inhabitants live in and around the town of Dadaab, many working directly or indirectly for the United Nations or nongovernmental organizations that provide services to the refugees. The main source of water for the residents of Dadaab for both the host communities and the refugee camps is groundwater from the Merti aquifer. There are about 56 boreholes supplying water to the host communities. There is concern that the Merti aquifer is becoming depleted in the vicinity of Dadaab area, although the status is not clear. Current water systems for the host communities comprise of boreholes, pumps, ground masonry or elevated steel tanks and some reticulation networks and water kiosks. Most of the infrastructure is dilapidated and is in dire need of rehabilitation and expansion.

The Government of Kenya has expressed its intent to close down the Dadaab refugee camp. A tripartite agreement between the Government of Kenya, UNHCR, and the Government of Somalia was signed to facilitate the repatriation of the refugees. However, the government is not forcibly repatriating people, and is instead encouraging people to move through provision of a package of assistance. The government recently extended the closing date from November 2016 to May 2017. The infrastructure in the refugee camps is expected to be used by the host communities once the camps are closed. The Bank-financed Kenya Development Response to Displacement Impacts Project, which is under preparation has launched a study to explore options for host communities to use the infrastructure of the camps, once they are closed. However, because the host communities are spread over a large distance of about 35 kilometers, all the boreholes will be required.

In Wajir county, about 83percent of inhabitants defecate in the open; none of the 127 villages has been certified to be open-defecation free. The 2014 Sanitation Benchmarking report ranked Wajir county 44 out of 47 on sanitation performance, with stunting rates for children under five at 50.7 percent. In Wajir town, about 5 percent of residents depend on septic tanks, 20 percent use bucket latrines, and 75 percent defecate in the open. The bucket latrine system was introduced to avoid contamination of the shallow aquifer. However, the management of the system has continued to deteriorate with increasing population within the town and its surrounding areas. Poor sludge emptying practices by inadequately or entirely untrained personnel, and who lack proper protective gear, have contributed to outbreaks of water-borne diseases. For example, between July and December 2015, Wajir County reported 2,000 cases of cholera, with more than 30 deaths.

In Garissa county, about 77 percent of people defecate in the open, and no single village has been certified as open defecation free. The 2014 Sanitation Benchmarking report put the stunting rate in Garissa at approximately 50 percent. Although sanitation statistics do not exist for Dadaab and Fafi subcounties as the host communities of the refugee camps, county officials estimate 30 percent latrine coverage and 70 percent open defecation. Sanitation-related disease outbreaks often spread between the refugee camps and the host communities, due to the frequent interactions of their residents. For example, the 2015 cholera outbreak (index case reported in camp), had 1,798 reported cases, of which 719 cases were from the host communities.

C. Proposed Development Objective(s)

Development Objective(s)

The Project Development Objective (PDO) is to improve water supply and sanitation services in select coastal and northeastern regions in Kenya.

Key Results

- (¢ People in urban areas provided with access to improved water sources under the project (number) [core indicator].
- (¢ People provided with access to improved sanitation services under the project) ➤ (urban (number) [core indicator].
- (¢ People benefiting under the project from a connection to the sewage system or from improved septic sludge management (number).
- (¢ People with existing connections benefiting from more hours per week of water services (number).

► (¢ Project beneficiaries (number), of which female (percentage) [core indicator].

D. Project Description

The PDO will be achieved by investing in water supply and sanitation infrastructure in urban centers in coastal counties and two counties in Kenya's arid northeastern region. The project will also improve services by strengthening institutional capacity in areas such as reducing non-revenue water, improving billing and revenue collection systems, and developing medium-term business plans. In addition, the WSDP will establish a results-based financing mechanism at the national level to provide incentives to WSPs to accelerate access to water supply and sanitation services and improve operational and financial performance.

The proposed Water and Sanitation Development Project will comprise four components. These are (1) rehabilitation and expansion of water supply and sanitation services in the coastal region, (2) expansion of water supply and sanitation services in marginalized northeastern counties of Kenya, (3) national performance-based financing, and (4) project management. The details of the components and the proposed activities are presented below.

Component Name

Component 1: Rehabilitation and expansion of urban water supply and sanitation services in the coastal region (US\$176 of which IDA-SUF US\$160 million)

Comments (optional)

Support to coastal counties to carry out a program of activities designed to improve WSS services in urban areas, including (i) construction and rehabilitation of water supply infrastructure investments; (ii) construction and rehabilitation of WWTPs, sewerage systems, on-site sanitation systems, septic sludge treatment facilities, and storm water works; and (iii) technical assistance and training for capacity building and institutional strengthening activities to support improved WSS performance of the participating counties and their WSPs.

Support to the coast bulk water services provider to carry out a program of activities designed to improve the interconnected coast water bulk system.

Component Name

Component 2: Expansion of water supply and sanitation services in marginalized northeastern counties of Kenya (US\$110 of which IDA US\$100 million)

Comments (optional)

This component will support the carrying out a program of activities designed to improve WSS services in Wajir town and in the Dadaab refugee camp host communities in Garissa County, including (a) WSS infrastructure investments; (b) capacity building and institutional strengthening activities to support improved water and sanitation performance of the Wajir and Garissa Counties and their WSPs, including, non-revenue water reduction, billing and revenue collection systems, and developing and implementing a utility business plan; (c) establishment of a regional office for Garissa WSP; and (d) operation and maintenance of the water supply and sanitation services.

Component Name

Component 3: National performance-based financing (PBF) (US\$40.7 of which IDA-SUF US\$37

million

Comments (optional)

This component will support the carrying out a program of activities designed to support the implementation of national performance-based financing instrument.

Support for WSS Infrastructure Investments . Construction of new or rehabilitation of existing WSS infrastructure for eligible WSPs, counties and WSBs.

Technical Assistance for Performance-based Financing. Carrying out a program of activities designed to enhance the capacity of WSPs for implementation of this Component 3 of the Project, such program to include (i) support towards the preparation of applications, final designs and bidding documents; and (ii) provision of training and technical assistance on issues such as reduction of non-revenue water, billing and collection, procurement and financial management.

Component Name

Component 4: Project management (US\$3.3 million of which IDA-SUF US\$3 million)

Comments (optional)

Carrying out a program of activities designed to strengthen the capacity of the Recipient for Project management, implementation and coordination, monitoring and evaluation, including: (i) establishment and implementation of a comprehensive monitoring and evaluation (M&E) system; (ii) training of the implementing agencies and County Governments on implementation of safeguard policies; and (iii) financing studies identified during implementation and preparation of follow on projects as needed.

E. Project location and salient physical characteristics relevant to the safeguard analysis (if known)

Component 1 supports coastal counties with water supply and sanitation infrastructure investments in urban areas. The coastal counties that are part of the Project include Mombasa, Kilifi, Kwale, and Taita Taveta counties. These counties are part of the Coastal Water Service Board that manage and operate the coastal bulk water supply system to these counties. The component also includes improvement to the bulk water system. Component 2 supports the counties of Wajir and Garissa located in Kenya's northeastern region, which is known to suffer from frequent droughts, poor sanitation, and high levels of poverty. The overwhelming majority of the project beneficiaries in Wajir and Garissa Counties are ethnic Somalis who qualify as VMGs according to the Constitution of Kenya and as IPs under OP 4.10. The Project will mainly focus in Wajir town and communities surrounding the Dadaab refugee camp (Dadaab host communities) in Garissa County. Component 3 is a national program and will benefit counties with water supply and sanitation infrastructure investments designed to increase coverage and improve service. The participating counties under component 3 will be determined during implementation following an application process.

F. Environmental and Social Safeguards Specialists

Edward Felix Dwumfour (GEN01)

Violette Mwikali Wambua (GSU07)

II. Implementation

Institutional and Implementation Arrangements

The project has been assigned an Environmental Assessment Category B based on the assumption that subprojects may result in potential adverse environmental and social impacts that can be reversed, are temporary in nature and scope, and can be easily and cost-effectively mitigated. It is also assumed that impacts may be site-specific and may not affect an area broader than the sites or facilities of the physical works.

As most of the locations/sites of the subprojects have not yet been identified, the Client has focused on preparing framework documents in a consultative manner, including (a) an Environmental and Social Management Framework (ESMF) to ensure that a process of identifying, assessing, and mitigating environmental and social impacts is integrated in the development of the specific subprojects; (b) a Resettlement Policy Framework (RPF) to clarify the principles, legal and institutional procedures for resettlement and rehabilitation to be applied to investments; and (c) Social Assessments (SA), specifically for Wajir and Garissa counties, to ensure the project interventions benefit as well as avoid any potential adverse effects on vulnerable and marginalized groups (VMGs). The majority of project beneficiaries in Wajir and Garissa counties are ethnic Somalis who qualify as VMGs, and therefore the criteria for OP 4.10 is met. Per the requirements of the policy, when Indigenous Peoples are the sole or the overwhelming majority of direct project beneficiaries it is not required to prepare an Indigenous Peoples Plan. However, SAs need to be prepared, consulted upon and disclosed. The elements of an IPP should be included in the overall project design. The ESMF, RPF and SAs have been prepared in accordance with the Bank's Operational Policy on Safeguards and the requirements of the Kenya National Environment Management Authority and National Land Commission. These documents have been consulted upon, approved by the Bank and disclosed in-country and on the World Bank's external website. The recommendations of the SAs are summarized in Annex 4 of the PAD and they will inform the technical studies and designs being conducted by the Client.

When new subprojects and their locations/sites are identified under the WSDP, the Client will prepare additional supplementary site-specific safeguard instruments including Environmental and Social Impact Assessments/Environmental and Social Management Plans (ESIAs/ESMPs) and Resettlement Action Plans/abbreviated Resettlement Action Plans (RAPs/aRAPs) which will be consulted upon, cleared by the World Bank, and then disclosed in-country and on the Bank's external website prior to commencement of any civil works.

For the locations/sites of subprojects that have been already identified or carried over from the ongoing Water and Sanitation Services Improvement Project (WaSSIP) (P096367), and have been scheduled for immediate urgent works, specific safeguard instruments have been prepared for these locations as follows:

► Rehabilitation and Expansion of the Mombasa Lot 2B Pipelines. This subproject intends to increase the water supply to Mombasa County via the expansion and rehabilitation of water pipelines within Mombasa West Mainland, Mombasa South Mainland, Mombasa North Mainland and Mombasa Island within Mombasa County. An update of the RAP has been prepared, consulted upon, and disclosed in country and in the Bank's external website. Since the scope and nature of the subproject has not been modified nor re-alignment/re-routing has occurred since the original ESIA was prepared, there will be no further work needed on the ESIA.

►(ç Improving the Existing Storm water Outlets, Outfalls and Combined Sewer Overflows in Mombasa Island. The subproject's objective is to reduce pollution of the Indian Ocean, by the removal of floatables and grit from seven storm water outlets, one outfall at Kizingo WWTP, and four Combined Sewer Overflows (CSOs) in Mombasa Island. The improvements will involve the construction of grit removal chambers and coarse and fine screens to reduce the amount of floatables and grits making its ways to the Indian Ocean. An ESIA and a RAP were prepared, consulted upon, and disclosed in-country and in the Bank's external website.

►(ç Kipevu WWTP Immediate Works and Extension. The subproject includes rehabilitation of the existing WWTP and rehabilitation of existing pumping stations, targeted trunk sewers and main secondary sewers. The wastewater system is located in Mombasa West Mainland service area. An ESIA and RAP have been prepared, consulted upon, and disclosed in country and in the Bank external website.

►(ç Additional Rehabilitation of the Baricho Wellfield. An ESIA was already prepared for the extension of the Baricho wellfield under the ongoing WaSSIP for the full capacity of the wellfield. The rehabilitation will not go beyond the capacity established in the existing ESIA, therefore no update of the ESIA is foreseen. A RAP was done under WaSSIP and no new RAP is required because the rehabilitation is on the existing guarded wellfield. All these safeguards documents are within validity period.

The WSDP led by the Ministry of Water and Irrigation (MWI) will be implemented at county level through the counties and their water services providers (WSPs). Inter-county infrastructure (coastal bulk water system) will be implemented by the Water Services Boards (WSBs) who have been overseeing and implementing various donor-supported projects. A rapid assessment of the capacity of entities such as MWI, and selected WSBs and WSPs revealed acceptable and satisfactory levels of technical know-how within these entities for planning, design and implementation of water and sanitation investments. Also, capacity to process and oversee the preparation of safeguard reports at MWI, WSBs and most of the WSPs has been found to be good, albeit needing enhancement, particularly in ensuring implementation of safeguard instruments and compliance enforcement of relevant national regulations and requirements such as the Environmental and Management Coordination Act (No 8 of 1999, as amended in 2015). The capacity challenges are stemming from limited filled positions for environmental and social safeguard officers/experts at the above-mentioned entities and the limited experience of those already in positions to satisfactorily identify risks and implement remediation measures. Under WSDP, the Borrower has committed to appoint/hire experienced environmental and social safeguard officers to support implementation of the safeguard instruments, monitor and enforce compliance. The project will prepare a safeguard capacity building plan to train and expose old and new safeguard officers to various aspects of environmental and social sustainability, including national regulations and requirements, World Bank Operational Policies on Safeguards, preparation and implementation of safeguard instruments, including compliance monitoring and reporting. This plan will be financed through the project.

The World Bank will complement Client-internal capacity building/strengthening efforts through the implementation support missions (ISM) and other monitoring visits that would be carried out in collaboration with the Client on regular basis.

III. Safeguard Policies that might apply

Safeguard Policies	Triggered?	Explanation (Optional)
Environmental Assessment OP/BP 4.01	Yes	<p>The investment will finance the construction and rehabilitation of water distribution and sanitation systems, involving, among others, the rehabilitation and construction of wastewater treatment plants, sewerage systems, and septic sludge treatment facilities in urban areas; extension of parts of the bulk water system that serves more than one county and the operation of the system; and increase access to water and sanitation services in Wajir town and in host communities near the Dadaab refugee camp in Garissa county. These civil works will lead to environmental risks and social impacts, including health and safety concerns. Therefore, the Environmental Assessment assigned to this Project is Category B. Since the scope and nature of most works as well as their specific locations are unknown at this stage of project preparation, the framework approach has been proposed, and the Client has prepared an ESMF and RPF. In addition, the Client prepared ESIA's for subprojects that have sites/locations identified and detailed designs. The Project will follow the WB- EHS Guidelines for Water and Sanitation.</p> <p>The ESMF and site specific ESIA's have been publicly consulted upon and disclosed in-country and on the Bank's external website.</p>
Natural Habitats OP/BP 4.04	Yes	While no significant negative impacts on natural habitats, including mangroves, are anticipated by project works, this policy is triggered given the types of works and the potential locations and associated environmental conditions. Depending on the subprojects and potential negative impacts to the natural habitats (flora and fauna), these subprojects will require special studies to protect or preserve the species identified at risk of being affected. If a subproject can cause irreversible damages, it will be excluded.
Forests OP/BP 4.36	No	Project funds will not support any investments that will be deemed risky and may be considered as likely to adversely impact on forests of all types.
Pest Management OP 4.09	No	<p>The project will not involve the purchase, manufacture or use of pesticides.</p> <p>The Project will not lead to increased/changed use of pesticides.</p>
Physical Cultural Resources OP/BP 4.11	Yes	The policy is triggered due to the possibility of chance finding of physical cultural resources during construction. Any potential chance finds will be addressed by incorporating

		<p>reporting and handling procedures as part of site specific ESIA and dealt with in the context of the ESMF.</p> <p>The Project will screen for PCRs and chance finds, and will include in the ESIA's appropriate plans, and measures will be put in place during the preparation and implementation of ESIA's so as to protect PCRs. The ESIA that will be prepared for such projects will include a physical cultural resources management plan that includes (a) measures to avoid or mitigate adverse impacts on physical cultural resources; (b) provisions for managing chance finds; (c) any necessary measures for strengthening institutional capacity for the management of PCR; and (d) a monitoring system to track progress of these activities.</p> <p>Mombasa Island is home to Mombasa Old Town, which is a heritage site recognized by UNESCO. Existing pump stations to be improved under the storm water outfall subproject are located in Mombasa Old Town. Although the improvements will not affect any cultural site, the fact that the site is located within the old town, care must be taken to ensure construction methods do not affect cultural sites within the area.</p> <p>Adequate procedures are included in the site specific ESIA. In addition, all works and activities in the Old Town will be in line with any existing UNESCO Management Plan as coordinated with the UNESCO Secretariat. These provisions will be included in works bidding documents.</p>
Indigenous Peoples OP/BP 4.10	Yes	<p>This is triggered on the fact that IPs have been identified in Wajir and Garissa counties. Given that the overwhelming majority of the project beneficiaries in Wajir and Garissa Counties are ethnic Somalis, the Client has prepared Social Assessment (SA) reports, and the findings and recommendations will be incorporated into the detailed designs and technical studies, which will ensure that project benefits accrue to these groups as well. Some of the SA recommendations include (i) building the capacity and competence of VMGs to enable effective participation in water governance will be part of the TA provided and it will also be part of the consultations about the proposed technical interventions; (ii) support the involvement of female VMGs in leadership and decision making within water user associations will be part of the TA provided to strengthen the water user associations ; (iii) provision of water for small scale farming and other livelihood promoting uses should be considered and included in the water design; and (iv) provision of watering points for livestock around water sources and along water pipelines. The SA reports have been publicly consulted upon</p>

		<p>and disclosed.</p> <p>Component 1 of the project is not expected to affect or encounter people considered as VMG/IP as it is entirely in urban areas, cities, or towns - Mombasa (Mombasa county), Kilifi, Malindi, and Mariakani (Kilifi county), Kwale and Ukunda (Kwale county) and Voi and Taveta (Taita Taveta county) of the coast.</p> <p>Component 3 will only work in a few select larger towns which have water utilities regulated under the WASREB. None of these urban areas/towns is considered to have VMGs/IPs.</p>
Involuntary Resettlement OP/BP 4.12	Yes	<p>It is assumed that the proposed civil works would result in land take and displacement (both economic and physical) of people. The Client has prepared a Resettlement Policy Framework (RPF), which has been publicly consulted upon and disclosed in-country and on the Bank's external website.</p> <p>The Client also prepared and disclosed specific RAPs for the immediate works indicated above. The RAPs indicate that about 341 project affected persons (PAPs) for Mombasa Lot 2B subproject, 116 PAP for the Mombasa outlet subproject and 93 PAP for the Kipevu WWTP will be affected by the proposed works. The RAPs include specific recommendations and guidelines to mitigate the impacts on the affected population.</p>
Safety of Dams OP/ BP 4.37	Yes	<p>The Project will finance distribution network infrastructure that will take drinking water from the Mwache dam which is under design. The construction will be financed through the Bank-financed Kenya Coastal Region Water Security and Climate Resilient Project (P145559). Thus, WSDP will rely on the performance (storage and operation) of a potential Dam under Construction (DUC). The relevant safeguard reports on the Mwache dam have been prepared by the Client, consulted upon, and disclosed in-country and on the Bank's external website. Thus, conditions in OP/BP 4.37 para 8.9 have been met. Nonetheless, prior to commencement of any civil works relating to the distribution network, the Client will arrange for one or more dam specialists to (a) inspect and evaluate the safety status of the dam under construction; (b) review and evaluate the owner's operation and maintenance procedures; and (c) provide a written report of findings and recommendations for any remedial work or safety-related measures necessary to upgrade the dam under construction to an acceptable standard of safety.</p>
Projects on	Yes	This policy is triggered because parts of the project will be

International Waterways OP/BP 7.50		<p>implemented in the area of the Merti aquifer which extends from Kenya into Somalia.</p> <p>On December 12th, 2016, the Government of Kenya delivered a notification letter to the Government of Somalia regarding the Project through the Embassy of Somalia in Nairobi. Because of an error in the notification letter, the Government of Kenya sent a revised letter to the Embassy of Somalia and to Somalia's Ministry of Water Resources on February 17th with a response date of March 6th, 2017.</p> <p>A memorandum to the Regional Vice President summarizing the results of Riparian Notification under OP 7.50 will be processed after March 6th. Negotiations will not be conducted until this process is completed.</p>
Projects in Disputed Areas OP/BP 7.60	No	The project will not be implemented in disputed areas.

IV. Key Safeguard Policy Issues and Their Management

A. Summary of Key Safeguard Issues

<p>1. Describe any safeguard issues and impacts associated with the proposed project. Identify and describe any potential large scale, significant and/or irreversible impacts:</p>
<p>The proposed Project is designed to generate positive long term impacts for the participating counties. The water and sanitation works that will be built in these counties will bring important benefits for public health, economic growth, and environmental sustainability primarily through: (i) the rehabilitation and construction of centralized wastewater systems and on-site sanitation facilities to reduce contamination of surface water, groundwater sources and drinking water networks; (ii) reducing the discharge of untreated wastewaters to surface water sources and beaches; and (iii) increasing coverage and improving service quality of drinking water systems.</p> <p>There are no anticipated large scale, significant or irreversible negative environmental impacts associated with the project. However, as indicated above, the works financed under the Project may result in potential adverse environmental and social impacts that can be reversed, are temporary in nature and scope, and can be easily and cost-effectively mitigated. The ESMF and RPF identified potential adverse impacts within the project areas, including loss of vegetation and fauna, pollution of water sources, reduction of water volume due to abstraction, reduced water quality due to wastewater, odor and noise from wastewater treatment, generation of solid waste and sludge, erosion and sedimentation downstream of the construction site, disruption of traffic flow during construction, accidents to workers and labor influx impacts, physical and economic displacement. All Project adverse impacts during construction and operation are expected to be managed with known technology, good practices and management solutions. The Project will follow the WB- EHS Guidelines for Water and Sanitation.</p> <p>In addition, even though main water and sewer pipelines will follow the right of way for roads, other potential works like plants, pumps stations, and storage tanks may have land acquisition implications and displacement (both economical and physical) that will require the design and implementation of RAPs. As indicated above, specific RAPs and ESIA's have been developed for</p>

three subprojects that have been carried over from the ongoing WaSSIP.
2. Describe any potential indirect and/or long term impacts due to anticipated future activities in the project area:
<p>As indicated above, the long term environmental impact of the Project is expected to be positive. Future risks depend in large part on adequate operation of the water supply and sanitation facilities. To that end, the Project includes specific mitigation actions for the operation stage, and it also includes capacity building and institutional strengthening of water service providers and their counties to improve overall service provision including operation and maintenance. It is important to mention that other projects are also supporting the coastal counties' WSPs, in particular Mombasa, with utility sector reform activities to improve their overall management, planning and O&M.</p>
<p>The ESMF indicates that the WSDP investment projects may individually have insignificant adverse environmental impacts. However, several water investments together, or in combination with other government or private sector activities within the water sector, could have a larger, more significant cumulative impact. This may be the case for water supply projects in Garissa and Wajir where water abstraction for domestic use may be part of activities financed under the Project. The cumulative impact from excessive abstraction for domestic use but also for irrigation could be groundwater or surface water depletion. The WaSSIP is financing a groundwater study for the Merti aquifer. The aquifer covers a large part of the region including Isiolo, Garissa and Wajir counties and extends beyond the Kenya-Somalia border into Somalia. The study is currently assessing the entire aquifer and developing a plan for development, monitoring, protection, and overall sustainable management of the aquifer. The result of this study will feed into the water master plan and feasibility studies being conducted in Wajir and Garissa. In addition, the ESMF and RPF indicates that addressing cumulative impacts requires avoidance and mitigation of the impacts of individual projects; careful planning, based on sound technical knowledge of the location, size, and material requirements of infrastructural projects, within the county planning cycles.</p>
3. Describe any project alternatives (if relevant) considered to help avoid or minimize adverse impacts.
<p>For the works that have not been defined, master plans, feasibility studies and designs are being conducted following the guidelines of the ESMF and RPF, which requires an evaluation of alternatives that would meet similar objectives considering environmental social, economic and technical aspects. For the case of the works that are defined several alternatives were considered:</p>
<p>Kipevu WWTP. The project design evaluated three types of sewer collection systems: separate systems (stormwater and wastewater collected in two separate systems), combined systems (stormwater and wastewater collected in one system), and partially separate systems (mostly wastewater with some contribution of rainwater). The project recommends to maintain a separate system for Mombasa because the landscape facilitates stormwater runoff to nearby water bodies and a combined system will be very expensive due to its required size to manage Mombasa's short and intense rain storms. Existing routing will be used as much as possible; however, rerouting may be necessary where people have encroached on existing lines and resettlement cost would exceed the cost of rerouting. The ESIA also includes an evaluation of the no action option vs the implementation of the project indicating that the overall benefits outweigh the potential adverse impacts.</p>
<p>Improving the Existing Storm Water Outlets, Outfalls and CSO in Mombasa Island. The Kipevu</p>

WWTP and this subproject are part of the short-term (Immediate works) actions included in the Mombasa Wastewater Master Plan. The alternatives during the design of the improvements include looking at different locations, rehabilitation of existing structures versus constructing a centralized headworks facility, and options for preliminary treatment technology. ESIA summarizes the evaluation of alternative conducted for this subproject.

Mombasa Water Lot 2B. This subproject is part of the recommended actions under the 2013 Coast Water Master Plan. The master plan includes scenarios and alternatives for water supply, three growth scenarios based on the 2009 census, determination of service levels and willingness/ability to pay for water within the target area. The master plan includes a comprehensive non- revenue water program to reduce physical and commercial water losses in the distribution network.

4. Describe measures taken by the borrower to address safeguard policy issues. Provide an assessment of borrower capacity to plan and implement the measures described.

A rapid assessment of the capacity of entities such as MWI, and selected WSBs and WSPs revealed acceptable and satisfactory levels of technical know-how within these entities for planning, design and implementation of water and sanitation investments. Also, capacity to process and oversee the preparation of safeguard reports at MWI, WSBs and most of the WSPs have been found to be good, albeit needing enhancement, particularly in ensuring implementation of safeguard instruments and compliance enforcement of relevant national regulations and requirements such as the Environmental and Management Coordination Act (No 8 of 1999, as amended in 2015).

The capacity challenges are stemming from limited filled positions for environmental and social safeguard officers/experts at the above-mentioned entities (in particular the counties and WSPs) and the limited experience of those already in positions to satisfactorily identify risks and implement remediation measures. Under WSDP, the MWI has committed to appoint/hire experienced environmental and social safeguard officers to support implementation of the safeguard instruments, monitor and enforce compliance. Furthermore each of the implementing agencies will appoint, nominate or recruit environmental and social specialists specifically for the Project. The Project will prepare a safeguard capacity building plan to train and expose old and new safeguard officers to various aspects of environmental and social sustainability, including national regulations and requirements, World Bank Operational Policies on Safeguards, preparation and implementation of safeguard instruments, including compliance monitoring and reporting. This plan will be financed through the project.

5. Identify the key stakeholders and describe the mechanisms for consultation and disclosure on safeguard policies, with an emphasis on potentially affected people.

Stakeholder consultations were conducted during the preparation of the ESMF, RPF, SAs, ESIA and RAPs. Consultation involved public meetings and focused group discussions in the participating counties. The main stakeholder identified and consulted include the MWI, Council of Governors, National Treasury, Coastal WSB, Northern WSB, representatives of participating counties and their WSPs, community based organizations (CBOs), NGOs and community leaders. The results of the consultations are captured in the safeguards instruments. Overall, community members were supportive of the Project and indicated that they hoped to see the timely completion of the works. Key stakeholders expressed concern about the potential of political interference, not having a consultation process during implementation, the need to conduct water sources studies (i. e. Merti Aquifer), odor issues at wastewater facilities, and clarification on compensation mechanisms, among others. Stakeholder feedback gathered through these meetings informed the final versions of the safeguards documents. The MWI disclosed the ESMF and RPF, and the ESIA

and RAP for Mombasa were disclosed by Mombasa County. The SAs for Wajir and Garissa were disclosed by the respective project implementing agencies in the two counties. During project implementation, the Client will follow the guidelines for consultation and disclosure included in the EMF for specific safeguards instruments.

B. Disclosure Requirements

Environmental Assessment/Audit/Management Plan/Other	
Date of receipt by the Bank	07-Feb-2017
Date of submission to InfoShop	21-Feb-2017
For category A projects, date of distributing the Executive Summary of the EA to the Executive Directors	
"In country" Disclosure	
Kenya	27-Feb-2017
<i>Comments:</i> ESMF and Site Specific ESIA's disclosed in MWI and Mombasa County's web sites.	
Resettlement Action Plan/Framework/Policy Process	
Date of receipt by the Bank	05-Feb-2017
Date of submission to InfoShop	15-Feb-2017
"In country" Disclosure	
Kenya	27-Feb-2017
<i>Comments:</i> RPF and Site Specific RAPs disclosed in MWI and Mombasa County's web sites	
Indigenous Peoples Development Plan/Framework	
Date of receipt by the Bank	06-Feb-2017
Date of submission to InfoShop	14-Feb-2017
"In country" Disclosure	
Kenya	27-Feb-2017
<i>Comments:</i> SAs for Garissa and Wajir disclosed in county web sites and MWI web site.	
If the project triggers the Pest Management and/or Physical Cultural Resources policies, the respective issues are to be addressed and disclosed as part of the Environmental Assessment/Audit/or EMP.	
If in-country disclosure of any of the above documents is not expected, please explain why:	

C. Compliance Monitoring Indicators at the Corporate Level

OP/BP/GP 4.01 - Environment Assessment	
Does the project require a stand-alone EA (including EMP) report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional Environment Unit or Practice Manager (PM) review and approve the EA report?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

Are the cost and the accountabilities for the EMP incorporated in the credit/loan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.04 - Natural Habitats	
Would the project result in any significant conversion or degradation of critical natural habitats?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>] NA [<input type="checkbox"/>]
If the project would result in significant conversion or degradation of other (non-critical) natural habitats, does the project include mitigation measures acceptable to the Bank?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.11 - Physical Cultural Resources	
Does the EA include adequate measures related to cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the credit/loan incorporate mechanisms to mitigate the potential adverse impacts on cultural property?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP/BP 4.10 - Indigenous Peoples	
Has a separate Indigenous Peoples Plan/Planning Framework (as appropriate) been prepared in consultation with affected Indigenous Peoples?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If the whole project is designed to benefit IP, has the design been reviewed and approved by the Regional Social Development Unit or Practice Manager?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
OP/BP 4.12 - Involuntary Resettlement	
Has a resettlement plan/abbreviated plan/policy framework/process framework (as appropriate) been prepared?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If yes, then did the Regional unit responsible for safeguards or Practice Manager review the plan?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Is physical displacement/relocation expected? 25 Provided estimated number of people to be affected	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] TBD [<input type="checkbox"/>]
Is economic displacement expected? (loss of assets or access to assets that leads to loss of income sources or other means of livelihoods) 550 Provided estimated number of people to be affected	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] TBD [<input type="checkbox"/>]
OP/BP 4.37 - Safety of Dams	
Have dam safety plans been prepared?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have the TORs as well as composition for the independent Panel of Experts (POE) been reviewed and approved by the Bank?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Has an Emergency Preparedness Plan (EPP) been prepared and arrangements been made for public awareness and training?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
OP 7.50 - Projects on International Waterways	

Have the other riparians been notified of the project?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
If the project falls under one of the exceptions to the notification requirement, has this been cleared with the Legal Department, and the memo to the RVP prepared and sent?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
Has the RVP approved such an exception?	Yes [<input type="checkbox"/>] No [<input type="checkbox"/>] NA [<input checked="" type="checkbox"/>]
The World Bank Policy on Disclosure of Information	
Have relevant safeguard policies documents been sent to the World Bank's Infoshop?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have relevant documents been disclosed in-country in a public place in a form and language that are understandable and accessible to project-affected groups and local NGOs?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
All Safeguard Policies	
Have satisfactory calendar, budget and clear institutional responsibilities been prepared for the implementation of measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have costs related to safeguard policy measures been included in the project cost?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Does the Monitoring and Evaluation system of the project include the monitoring of safeguard impacts and measures related to safeguard policies?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]
Have satisfactory implementation arrangements been agreed with the borrower and the same been adequately reflected in the project legal documents?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>] NA [<input type="checkbox"/>]

V. Contact point

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VII. Approval

Task Team Leader(s):	Name: Andreas Rohde	
<i>Approved By</i>		
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Practice Manager/ Manager:	Name: Jonathan S. Kamkwalala (PMGR)	Date: 01-Mar-2017
Country Director:	Name: Thomas O'Brien (CD)	Date: 01-Mar-2017