POLICY BRIEF

POLITICAL ECONOMY OF CLIMATE CHANGE INTERVENTIONS IN KENYA: WHO BENEFITS AND WHO LOSES?

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Policy Brief on Political Economy Analysis of Climate Change Interventions in Kenya: Who Benefits and Who Loses?

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EXECUTIVE SUMMARY

The political economy analysis of climate change interventions in Kenya has been undertaken in reference to the constitutional focus on pursuit of sustainable development, the impacts of climate change, the role of various stakeholders, and how various strategic actions could be executed. This political economy analysis concurs that in order to have a win-win outcome, or a result where most of the stakeholders benefit from climate change action, Kenya needs to pursue the prioritization of adaptation to climate change, and the explicit embracing of building resilience and enhancing adaptive capacity as critical steps to dealing with the vulnerability resulting from the adverse impacts of climate change. This does not mean the country will not implement mitigation actions. In addition, Kenya will need to enhance application of the mainstreaming approach as the mechanism for delivering on climate change actions. This is an approach that requires operationalization of the complex institutional framework at the national and county government level to support the mainstreaming of climate change actions.

Kenya's economy is very dependent on climate-sensitive sectors such as agriculture, water, energy, tourism and wildlife, and health. The impact of climate change increases the vulnerability of the people, the economy and environment to extreme weather events, such as droughts and floods whose occurrence is now more frequent.

Kenya, taking cognizance of the vulnerability to the adverse impacts of climate change, has made a decision to prioritize adaptation actions, while implementing progressive mitigation actions with the aim of achieving a low carbon climate resilient development pathway. In 2016, Kenya enacted the 2016 Climate Change Act (CCA) and adopted the Sessional Paper No.5 of 2016 on National Climate Change Framework Policy, both of which frame the country's agenda for climate change response actions. These are to be implemented through a five-year National Climate Change Action Plan (NCCAP), as required by section 13 of the CCA. An elaborate institutional structure has been established, that adopts the operating model to implement climate change through "mainstreaming" and recognizing the key roles of the various stakeholders.

A political economy analysis of climate change actions in Kenya requires an assessment of whether the regulatory instruments facilitate an equilibrium with pursuit of sustainable development as the reference point, or whether as a consequence, there are winners and/or losers from the choices made by the government. The pursuit of sustainable development is the reference point against which to undertake a political

economy assessment of climate change actions in Kenya. This is because sustainable development requires the balancing of social, economic, environmental, cultural and political considerations during decision making, with a favorable focus on actions that result in, or permit ecological balance. The approach helps to prevent the framing of climate change only as an environmental problem, instead this approach frames climate change as an overall developmental challenge facing countries such as Kenya. It is thus consistent with the idea of a policy driven socio-ecological transformation. This view is validated by the 2030 Sustainable Development Goals.

This policy brief examines the role of the various actors, at different scales, and attempted to provide insight on how enhanced stakeholder engagement can contribute to Kenya's socio-economic and environmental transformation towards fulfilment of sustainable development.

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1.0 INTRODUCTION

The 1992 United Nations Framework Convention on Climate Change (UNFCCC) defines climate change as 'a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods.' The UNFCCC makes a distinction between climate change which is attributable to human activities, and climate change attributable to natural occurrences. According to Sessional Paper No.5 of 2016 on National Climate Change Framework Policy, current data demonstrates that the climate in Kenya is changing at an unprecedented rate, with unparalleled levels of human induced greenhouse gas (GHG) emissions, and it is now clear that climate change has become an impediment to the sustainable development of Kenya, and urgent action is required.

Kenya's economy is very dependent on climate-sensitive sectors such as agriculture, water, energy, tourism and wildlife, and health. The economic cost of climate change is estimated to be equivalent to 2-2.4 per cent of GDP each year. Specifically, estimated costs of floods are 5.5 per cent of GDP every 7 years, while droughts account for 8% of the GDP in every 5 years. The increasing intensity and magnitude of weather-related disasters in Kenya aggravates conflicts, mostly over natural resources, and contributes to security threats. According to the Adaptation Technical Report prepared for the 2018-2022 National Climate Change Action Plan (NCCAP), climate change and extreme weather events are major factors contributing to land degradation, with changes in soil properties that reduce the soil's ability to sustain peculiar quality and quantity of plant growth. However, human activities pose the greatest threat through unsustainable land management practices, such as destruction of natural vegetation, over-cultivation, over grazing and excessive forest conversion. Further, desertification in the Arid and Semi-Arid Lands (ASALs) can be attributed to climate change impacts, in addition to human activities, with the ASAL landmass in Kenya intensifying and spreading, from 80% to 89% in 2017 thereby reducing the productivity of the land and negatively affecting communities.

These climate change impacts increase the vulnerability of the people, the economy and environment to extreme weather events, such as droughts and floods whose occurrence is now more frequent. These climate related hazards, including forest fires and landslides, when combined with the vulnerability resulting from climate change impacts, result in disasters that can eliminate or significantly reduce the ability of people to cope with changes. This context places immense hurdles in the path of Kenya to securing ecologically sustainable development, as envisaged by the Constitution (article 69(2)).

According to the 2015 Nationally Determined Contributions (NDC) submitted to the UNFCCC Secretariat, and the draft 2018-2022 National Climate Change Plan (NCCAP), Kenya aims to implement mitigation measures that have been identified across six sectors of the economy: energy, transport, industry, waste, forestry and agriculture. This is based on article 4.1 of the UNFCCC. Submission of the NDC is a requirement on Kenya in terms of article 4(2) of the Paris Agreement, which came into force for Kenya on 27 January 2017 after ratification. The NCCAP, as discussed later in this policy brief, is the principal legal mechanism that Kenya utilizes under the section 13 of the Climate Change Act, No. 11 of 2016 (CCA, No.11 of 2016), to mainstream and implement prioritized climate change actions across sectors of the economy, and institutionally at the national government, county governments, the public, and private entities.

It is important to note that Kenya, taking cognizance of the vulnerability to the adverse impacts of climate change, has made a decision to prioritize adaptation actions, while implementing progressive mitigation actions with the aim of achieving a low carbon climate resilient development pathway. This is evident from the 2015 NDC which notes that Kenya being a minimal contributor to Greenhouse Gas (GHG) Emissions, places priority on adaptation to climate change, with the intention to address the vulnerabilities resulted from the adverse impacts arising from Climate Change.

In 2013, after a participatory process, Kenya adopted the 2013-2017 National Climate Change Action Plan (NCCAP), to guide prioritization of various actions, including providing the technical basis for a new legal, policy and institutional framework. Thus, building up on the 2013-2017 NCCAP, in 2016, Kenya enacted the 2016 Climate Change Act (CCA) and adopted the Sessional Paper No.5 of 2016 on National Climate Change Framework Policy, both of which frame the country's agenda for climate change response actions. These are to be implemented through a five-year NCCAP, as required by section 13 of the CCA. An elaborate institutional structure has been established, that adopts the operating model to implement climate change through "mainstreaming" and recognizing the key roles of the various stakeholders.

2.0 THE CASE FOR A POLITICAL ECONOMY ASSESSMENT OF CLIMATE CHANGE ACTIONS

Against this evolving context, it is important to undertake a political economy analysis of the climate change responses in Kenya, in order to critically review how the choice of regulatory (legal, institutional and policy) instruments is intended to operate, and how this impacts the roles of stakeholders (including the public) as well as the country's progress in addressing adaptation and mitigation. The specific objectives of this policy brief are as follows:

1. To provide concrete political economy analysis of climate change adaptation and mitigation in Kenya with a focus on who loses, and who wins as a result of the choice of regulatory tools, and actions taken
2. To unpack the Kenyan climate change landscape for enhanced stakeholder engagement as well as Socio-Ecological Transformation (SET) in the various sectors affected by climate change in Kenya
3. To provide relevant information to relevant actors in guiding the implementation of Kenya's climate change policies, plans and programmes

According to the 2016 Climate Change Policy and the CCA, Kenya, due to the vulnerability to climate change impacts, aims to enhance adaptive capacity and resilience to climate change, and promote low carbon development for the sustainable development of the country. The Climate Change Policy further observes that while Kenya currently contributes very little to global GHG emissions, a significant number of priority development initiatives outlined in Vision 2030 and regular Medium Term Plans (MTPs) that are used to implement Vision 2030, will impact on Kenya's levels of GHG emissions. The Policy thus recognizes that climate change affords opportunities as well as challenges, such that actions to address climate change can help to catalyse Kenya's transition to a green economy and generate employment in new areas. This is critical for framing actions to address the contemporary socio-ecological crisis that, in some part, results from a growth focused economic model that fails to balance social, environmental, economic, and cultural needs for the society. A transformation to resolve this crisis, for Kenya, is hinged on a constitutional requirement to pursue sustainable development, which is mandated in two forms:

- Sustainable development framed as one of the values and principles of national governance in Kenya, which in terms of article 10 of the Constitution, are mandatory and binding and therefore should be taken into account, whenever any person (public officer or private person) is making or implementing any law, or making any public policy decision.

- Article 69(2) of the Constitution requires every person (natural person, and legal persons such as companies) to cooperate with each other in working to protect and conserve the environment and ensure ecologically sustainable development and use of natural resources.

A political economy analysis of climate change actions in Kenya therefore requires an assessment of whether the regulatory instruments facilitate an equilibrium with pursuit of sustainable development as the reference point, or whether as a consequence, there are winners and/or losers from the choices made by the government. Ideally, as noted above, choices made by Kenya, in implementing climate change actions, should result in an equilibrium of sustainable development. This is further evident from the rationale of the 2016 Climate Change Policy which provides as follows:

> This Policy is designed to provide a framework to guide the development and implementation of specific, detailed and costed climate change interventions through regular and periodic Climate Change Action Plans. By putting in place this policy architecture, Kenya aims to safeguard the wellbeing of its citizens, their property, and the country's prosperity in the face of a changing climate. This Policy therefore aims to enhance adaptive capacity and build resilience to climate variability and change, while promoting a low carbon development pathway. (emphasis added with italics).

The 2016 Climate Change Policy enhances this approach by making a case for the choice of mainstreaming as the methodology for implementing climate change actions in Kenya, highlighting the benefits of a climate change mainstreaming approach as follows:

- Mainstreaming ensures vulnerability assessments are integral to major policy decisions.
- Mainstreaming facilitates a coordinated and comprehensive policy response across sectors and administrative levels.
- Mainstreaming ensures Kenya's prosperity in the context of a changing climate by explicitly linking its climate change response to sustainable development.

This approach by the Policy is consistent with the goal of 2016 CCA, which is to support the development, management, implementation and regulation of mechanisms to enhance climate change resilience and low carbon development for the sustainable development of Kenya.

From the foregoing discussion, it emerges that the pursuit of sustainable development, is the reference point against which to undertake a political economy assessment of climate change actions in Kenya. This is because sustainable development requires the balancing of social, economic, environmental, cultural and political considerations during decision making, with a favourable focus on actions that result in, or permit ecological balance.

The approach helps prevent the framing of climate change as an environmental problem, which has the impact of framing climate change as an (environmental) sectoral problem, and instead, framing climate change as a developmental challenge facing countries such as Kenya. It is thus consistent with the idea of a policy driven socio-ecological transformation. This view is validated by the 2030 Sustainable Development Goals, which in the preamble frame the ambitions of countries of the world, including Kenya as follows:

- We envisage a world free of poverty, hunger, disease and want, where all life can thrive.
- We envisage a world of universal respect for human rights and human dignity, the rule of law, justice, equality and non-discrimination; of respect for race, ethnicity and cultural diversity; and of equal opportunity permitting the full realization of human potential and contributing to shared prosperity.

The imperative to address climate change in context of sustainable development is further heightened by inclusion of SDG 13, calling on nations to take urgent action to combat climate change and its impact, through actions including:

> SDG 13 -
> 13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
> 13.2 Integrate (mainstream) climate change measures into national policies, strategies and planning
> 13.3 Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning

Thus, this political economy analysis is based on a presumption that, on account of a constitutional requirement (article 10, 69(2)), the CCA and Climate Change Policy, Kenya is pursuing climate change action with the intention to achieve the optimal balance required to achieve sustainable development. According to the law and policy, the goal of all these climate change actions is to ensure the achievement of a low carbon climate resilient development pathway. But this, according to the 2015 NDC, and the 2015-2030 Kenya National Adaptation Plan, focuses mainly on adaptation actions, to address vulnerability of the society, environment and economy from the adverse impacts of climate change, discussed in the introductory section.

Further reading:

- Climate Change Act, No. 11 of 2016
- 2013-2017 Medium Term Plan for Vision 2030
- 2015-2030 Kenya National Adaptation Plan: Enhanced climate resilience towards the attainment of Vision 2030 and beyond
- Sessional Paper No. 10 of 2012 on Kenya Vision 2030
- Sessional Paper No.5 of 2016 on National Climate Change Framework Policy
- United Nations General Assembly. 70/1. Transforming our world: the 2030 Agenda for Sustainable Development (A/RES/70/1 Sustainable Development Goals)

3.0 CLIMATE CHANGE ACTORS IN KENYA IN CONTEXT OF EVALUATING THEIR ROLE IN SUPPORTING EQUILIBRIUM FOR CLIMATE ACTIONS SUPPORTIVE TO SUSTAINABLE DEVELOPMENT

Climate change actors in Kenya can be classified into three categories, based on their roles and functions in addressing or responding to climate change challenges:

3.1 Public sector stakeholders drawing their mandate from legislation

In this category of stakeholders, there are institutions and actors specifically created by the 2016 CCA, or other legislation, who perform key roles intended to achieve the national climate change objective of achieving low carbon climate resilient development. These include the following actors:

Table 1 – Public sector climate actors with a statutory mandate

Institution	Climate Change Role
National Climate Change Council	- Established by the CCA as a national high level oversight body with political convening power to support mainstreaming climate change throughout all sectors, and by various key stakeholders. - Chaired by the President with Deputy President as Deputy Chairperson. - Comprises membership drawn from Cabinet Secretaries (Treasury, Planning, Energy, Climate Affairs), Council of Governors, Private Sector, Civil Society, Academia, Marginalized communities. - Report to Parliament on mainstreaming efforts by national government agencies.
National Government Ministries, departments and agencies	- Required to mainstream climate actions into their sectors. - Required to implement the NCCAP. - Required to establish Climate Change Units to coordinate mainstreaming of climate change actions
Cabinet Secretary responsible for	- Member of the Climate Change Council.

climate change affairs	Responsible for development, and monitoring implementation of NCCAP. Overall technical role to implement Climate Change Act, and Policy.
Climate Change Directorate	Technical arm of national government to support Cabinet Secretary. Functioning as the Secretariat for the National Climate Change Council.
National Environment Management Authority (NEMA)	Has overall compliance and enforcement role under the CCA in Kenya, on behalf of the Council.
Parliament	Specific role to undertake oversight on mainstreaming by national government agencies. Roles for National Assembly in receiving reports on the progress towards mainstreaming by national governance agencies in terms of section 15 of the CCA. National Assembly and Senate to approve appointment to the Climate Change Council of representatives from private sector, marginalized communities civil society, and academia.
Council of Governors	Represents devolved governments at the Council.
County Governments	Specific mandates to implement national law, policy and NCCAP at county level. Required to mainstream NCCAP into county development plans. Required to appoint a County Executive Committee Member as responsible for climate change. Reporting to the County Assembly on the progress on mainstreaming climate actions across sectors.
County Assemblies	Carry out county oversight on mainstreaming of climate actions by the county government.

3.2 Stakeholders with a key role of catalyzing public participation

In this category, there are stakeholders that have specific roles defined under the CCA, or roles which although not statutory, have an impact on the implementation of climate change actions. These stakeholders include:

3.2.1 Civil society organizations (CSO)

They have an enduring role to catalyze public participation through mechanisms such as advocating for meaningful public consultations on key climate change decisions; providing public awareness; and promoting public access to information on climate change through CSO advocacy roles that give a voice to the public. CSOs based at community level, for instance, have an important role to play. In essence, CSOs play a key role in supporting realization of human rights that are critical for pursuing the balance of interests necessary in the pursuit of sustainable development. This includes procedural rights relating to public participation, such as public consultations, public representation in decision making processes, providing civic awareness and access to information.

3.2.2 Advocacy groups lobbying for specific interests:

These special interest groups representing a particular section of society provide a platform to catalyze stakeholder involving in climate change actions. They include entities such as the Kenya Association of Manufacturers (KAM), Kenya Private Sector Alliance (KEPSA), the Federation of Women Lawyers (FIDA), or the Federation of Kenya Employers (FKE). One category is trade unions which represent the interests of workers, such as fair wages and benefits. Advocacy groups can be found at professional or community level. They give a voice to their members and may often have close proximity to decision makers such as trade unions through collective bargaining rights and processes; or KEPSA through the KEPSA Presidential roundtable, etc. This may provide heightened leverage in having special interests accommodated in policy decisions, and in the case of business interests, that may create an imbalance as a result of favoring growth based economic prioritization rather than the socio-ecological transformation required to support balanced sustainable development.

The 2016 CCA attempts to address this risk by providing for private sector representation on the National Climate Change Council chaired by the President, where discussions on interests maybe had in context of the national/county/special interests of other interest groups represented on the Council, and in context of the legal mandate of the CCA. Through section 16, the CCA makes provision for the Climate Change Council to impose climate change obligations on private entities, including entities constituted under the Public Benefits Organizations Act, 2013. These climate change duties are defined as statutory obligations (i.e. those established through a legal requirement) conferred on public and private entities to implement climate change actions consistent with the national goal of low carbon climate resilient development. The specific nature of the climate change duties will be determined through regulations (that are yet to be enacted), and once in place, compliance by the private entities will be enforced by the National Environment Management Authority (NEMA).

3.2.3 The National Climate Change Council, and the Cabinet Secretary:

The National Climate Change is a major stakeholder who have a specific oversight on various aspects of the CCA that are necessary for implementation of the national mandate:

- Ensure the mainstreaming of the climate change function by the national and county governments;
  - Approve and oversee implementation of the National Climate Change Action Plan.
    - The Cabinet Secretary has to the responsibility to formulate and periodically review the climate change policy, strategy and the National Climate Change Action Plan and submit to the Council for approval.
  - Advise the national and county governments on legislative, policy and other measures necessary for climate change responses and attaining low carbon climate change resilient development.
    - The Cabinet Secretary, through the Climate Change Directorate, has the mandate of providing the required technical support.
  - Approve a national gender and intergenerational responsive public education awareness strategy and implementation programme.
    - The Cabinet Secretary has the mandate of formulating the national gender and intergenerational responsive public education and awareness strategy on climate change and implementation programme for approval by the Council.
  - Provide policy direction on research and training on climate change including on the collation and dissemination of information relating to climate change to the national and county governments, the public and other stakeholders;
  - Provide guidance on review, amendment and harmonization of sectoral laws and policies in order to achieve the objectives of this Act. This is important to ensure that the mainstreaming direction of the CCA is progressively transferred to various other laws.

The Council has the unique mandate for ensuring effective and optimal engagement of the public in climate change matters nationally. This is through the mandate in section 30 of the CCA which requires the Council to approve and publish, every 12 months, a public engagement strategy setting out the steps that the Council intends to take to inform the public about National Climate Change Action Plans (NCCAPs) specified under this Act; and encourage the public to contribute to the achievement of the objectives of those NCCAPs. It is important to highlight that the CCA requires that any public engagement strategy approved by the Council must, in particular, identify actions which the public may take to contribute to the achievement of the national objective of enhancing climate change resilience and low carbon development for the sustainable development of Kenya.

Although this public engagement strategy has not been developed yet more than two years since commencement of the CCA on 27 May 2016, it is an important legal and policy tool that will provide a valuable opportunity for the Kenya public to make a contribution on framing and implementing actions, at various levels, that will support adaptation and mitigation, as maybe necessary, in a manner that is balanced for realization of sustainable development. The development of this strategy, and the requisite public consultations, in compliance with the provisions of the CCA, discussed below, is the role of the Cabinet Secretary and the Climate Change Directorate. This process will require extensive public consultations.

3.2.4 The role public entities, at the national and county government level to undertake meaningful public consultations during decision making, and provide feedback

Public entities, at the national government, and the county governments level, all have an obligation under the CCA (section 24) to ensure that at all times, when developing strategies, laws and policies relating to climate change, they undertake public awareness and conduct public consultations. More specifically, these public entities are required by the CCA to undertake public consultations in a manner that ensures the public contribution makes an impact on the threshold of decision making:

- The specific legal and practical meaning of "ensuring that public contribution makes an impact on the threshold of climate change decision making," is an important component of the political economy analysis. This is because it suggests an inherent obligation on public entities here, to dutifully take into account the public obligations, and provide feedback to the consulted public, demonstrating clearly how that contribution was taken into account when making the climate action decision in question.
- Section 24(3) of the CCA requires the Council, based on the recommendation of the Cabinet Secretary, to make subsidiary legislation (regulations) that set out the procedure how to ensure the efficacy of public consultations in order to ensure that they make an impact on the

threshold of decision making on climate change at all levels of government.

3.2.5 Roles and rights of the Kenyan public as a stakeholder:

The Kenyan public, in terms of citizens and lawful residents of the country have a significant stake over climate actions, as they are directly affected by the adverse climate change impacts in various contexts – as farmers, business owners, children, etc. Thus, public participation in the various climate change related processes and decision making is key to ensuring a balanced role of the public in a manner supportive to Kenya's priority of addressing climate change induced vulnerabilities through adaptation actions to enhance resilience and build adaptive capacity. Section 24 of the CCA, discussed in the foregoing section is instructive, and will play a key role in enhancing public consultations in climate change decision making processes by public agencies throughout Kenya.

The role of CSOs in supporting the interests of the public at all levels is critical. Similarly, important is ensuring mainstreaming of citizens interests into the NCCAP, and more locally by the county governments when they (in a participatory manner required by the County Governments Act, 2012) develop the County Integrated Development Plans every five years (section 19, CCA). The approach should involve adoption and implementation of subsidiarity as a strategy for climate change mainstreaming, in terms of Principle 10 of the 1992 Rio Declaration which requires (environmental) decision making – still applicable in the broader climate change context – to be treated in the following manner:

> Environmental issues are best handled with the participation of all concerned citizens, at the relevant level. At the national level, each individual shall have appropriate access to information concerning the environment that is held by public authorities, and the opportunity to participate in decision-making processes. States shall facilitate and encourage public awareness and participation by making information widely available. Effective access to judicial and administrative proceedings, including redress and remedy, shall be provided.

It is important to note that public participation, in all its forms (public consultation, public representation in decision making, access to court, access to justice, public awareness, etc.) are protected by the Constitution. Article 10, sets out "participation of the people" as one of the values and principles of national governance in Kenya, which are mandatory and binding and therefore should be taken into account, whenever any person (public officer or private person) is making or implementing any law, or making any public policy decision. Article 69(1), which places obligations on the Kenyan State to fulfil the article 42 human rights to a clean and healthy environment, requires the government to encourage public participation in the management, protection and conservation of the environment.

In addition to mechanisms, opportunities and requirements of the law for the public to be involved in climate change decision making, certain human rights provisions compel public participation. The Constitution guarantees various human rights for citizens including right to participate in governance processes, access to information (citizens only), the (article 42) right to a clean and healthy environment (threatened by some climate change impacts), and the (article 35) right of access to justice which is however restricted to citizens only. The 2016 Access to Information Act provides the detailed administrative mechanism through which public entities should implement the right of access to information, including the requirement for each public entity to designate its Chief Executive Officer as the Information Access Officer with responsibility to implement the legal requirements for access to publicly held information.

There is a constitutional right of access to court to enforce any of the human rights (article 22) and more specifically, the right (article 70) to bring an action where violation of the human right to a healthy environment has occurred, is happening, or likely to occur. It is important to note that under article 22 of the Constitution, legal action to protect human rights can be brought by a person protecting their own human rights, and also by -

- a person acting on behalf of another person who cannot act in their own name;
- a person acting as a member of, or in the interest of, a group or class of persons;
- a person acting in the public interest; or
- an association acting in the interest of one or more of its members.

Under article 70, a if a person alleges or claims that a right to a clean and healthy environment recognized and protected under Article 42 has been, is being or is likely to be, denied, violated, infringed or threatened, the person may apply to the Environment and Land Court, for redress in addition to any other legal remedies that are available in respect to the same matter. (emphasis added). The remedies available to the applicant from the court include the following orders or direction to:

- Prevent, stop or discontinue any act or omission that is harmful to the environment;

- Compel any public officer to take measures to prevent or discontinue any act or omission that is harmful to the environment; or
- Provide compensation for any victim of a violation of the right to a clean and healthy environment.

It is important to note that a person bringing a legal suit under article 70, just like under article 22, does not have to demonstrate that any person has incurred loss or suffered injury, and therefore any person has legal standing to take legal action to protect the environment on their own personal behalf, or in the public interest.

The article 70 constitutional right of access to court right has been expanded by section 23 of the CCA to provide an open right to the Kenyan public to bring legal actions for enforcement of rights relating to climate change as follows: (reproduced verbatim)

> (1) A person may, pursuant to Article 70 of the Constitution, apply to the Environment and Land Court alleging that a person has acted in a manner that has or is likely to adversely affect efforts towards mitigation and adaptation to the effects of climate change.
> (2) Where an application is made under sub-section (1), the Court may make an order or give directions that it considers appropriate to—
>> (a) prevent, stop or discontinue an act or omission that is harmful to the environment;
>> (b) compel a public officer to take measures to prevent or discontinue an act or omission that is harmful to the environment; or
>> (c) provide compensation to a victim of a violation relating to climate change duties.
>
> (3) For the purposes of this section, an applicant does not have to demonstrate that a person has incurred loss or suffered injury.

With this bouquet of legal rights and processes, it should be possible for the public to play an important role in climate change decision making, and implementation of climate actions through the public participation tools highlighted above. The government, through the various public entities have the role to activate key aspects of the public participation required, as highlighted earlier. Similarly, the CSOs and private sector (business) have an important role, which when pursued in a balanced manner – rather than merely prioritization sector business interests, can support the socio-ecological transformation that blends low carbon climate resilient development actions and sustainable development.

Further Reading:

- Access to Information Act, No. 31 of 2016
- Climate Change Act, No. 11 of 2016
- Constitution of Kenya, 2010
- Environment Management and Coordination Act, 1999
- Rio Declaration on Environment and Development (1992)
- The 1998 UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).
- Revised (2003) African Convention on the Conservation of Nature and Natural Resources. (specifically article 16 on Procedural Rights)
- Public Benefits Organizations Act, 2013 (No. 18 of 2013)
- Report on 8th Presidential Roundtable by KEPSA & Government Leadership: Unlocking Potential on Private Sector Participation in the Big Four Agenda.

4.0 ASSESSMENT OF THE KEY POLITICAL ECONOMY CONSIDERATIONS IN CLIMATE CHANGE POLICY AND DECISION MAKING IN KENYA

With sustainable development as the reference point, and the roles of stakeholders mapped out, it is important to examine how Kenya can put in place political economy considerations in climate change decision making, in a manner that favours an equilibrium outcome balancing interests towards sustainability.

4.1 Balancing adaptation and mitigation actions

As highlighted earlier, the national policy and legal position adopted for Kenya is to prioritize adaptation, while aiming to attain low carbon climate resilient development. Kenya has identified mitigation actions across six sectors of the economy, that is, energy, transport, industry, waste, forestry and agriculture.

According to a 2017 review of the implementation of the 2013-2017 NCCAP, substantial progress has been made on implementation of mitigation actions. The review reported that progress is being made toward the long-term 2030 greenhouse gas (GHG) emission reduction goals, with actions being implemented in the six priority mitigation areas but data collection is not yet at a point that enables calculation of the emission reductions through the six priority mitigation actions.

Adaptation actions, to be implemented in Kenya, should address the challenge of vulnerability to the adverse impacts of climate change. They are either planned or reactive adaptation to the impacts of climate change, and aim to achieve two outcomes. First, adaptation aims to build the resilience of the people, economy or environment to maintain normal function in the face of climate change. Second, adaptation aims to enhance the adaptive capacity of the people, economy and environment to adjust behavior and strategies, resources and technologies in order to effectively overcome the vulnerabilities presented by climate change impacts. One example of enhancing adaptive capacity is the climate proofing of road infrastructure to protect from extreme heat, or flooding and therefore reducing the vulnerability of the road from those adverse impacts. Without climate proofing, those climate hazards (extreme heat, floods) would combine with the vulnerable road, resulting in a disaster – such as a road collapse, or being washed away by flooding waters.

The 2016 National Climate Policy is clear that the sustainable development of Kenya significantly depends on the design and implementation of adaptation actions (planned or reactive) that trigger and enhance climate change resilience and adaptive capacity. This, if designed and implemented appropriately with clear financing, and participation of various state and non-state actors together with the public, can deliver the balance required to attain development that is sustainable. To achieve this, it is necessary to entrench stakeholder, and public participation (particularly in the form of public awareness, access to information, and meaningful consultations). This approach will ensure a balance of outcomes because assessments for vulnerability to impacts of climate change (critical prior to adaptation actions) should include analysis of localized socio-economic, environmental and cultural impacts – and integrate this into climate change actions that are selected and prioritized for implementation. This is a role not only for public (national and devolved) entities, but also for private entities, and the public, to carry out.

This is because in order to be successful, adaptation to climate change requires balancing competing environmental, economic, social, cultural and political interests. In the absence of such balancing, harmful unintended consequences can undo the benefits of adaptation initiatives. For example, without this approach, efforts to reduce emissions from smallholder farming (e.g. livestock keeping) could result in farmers adopting commercial monocropping practices with reduces biodiversity and could affect resilience of the soil and result in cutting for forests.

4.2 The choice to adopt mainstreaming as the legal and policy approach

To support pursuit and adoption of integrated climate change actions, Kenya has adopted mainstreaming as the overarching regulatory (legal, institutional and policy) approach for implementing climate change actions. The CCA (section 2) defines mainstreaming as the integration of climate change actions into decision making and implementation of functions by the sector ministries, state corporations and county governments. Mainstreaming here focuses on implementation of actions consistent with the nationally adopted low carbon climate resilient development pathway that prioritizes adaptation actions.

According to the 2016 National Climate Change Policy, mainstreaming is necessary to equip various coordinating and sectoral agencies of the Kenyan national and county governments with the tools to effectively respond to the complex challenges of climate change. This requires explicitly linking climate change actions to core planning processes through cross-sectoral policy integration. This integration operates horizontally by providing an overarching national guidance system, such as through this Policy and national climate change legislation; and vertically by requiring all sectors and levels of government to implement climate change responses in their core functions. This is done, for instance, through the Medium-Term Expenditure Framework for budget making, and converting policies and plans linked to climate change into expenditure and action.

Mainstreaming, when implemented fully, is a process that encourages cooperation across government departments in planning for a longer-term period; rather than fragmented, short-term and reactive budgeting. County governments are, for instance, required by the CCA (section 19) to prepare and implement County Integrated Development Plans, through which climate change actions can be mainstreamed. To attain this climate change mainstreaming, there is need for Kenya to put in place a framework and tools to integrate climate change responses into national and county planning processes, including economic planning, development policies, performance contracting, and the budget making process.

Under the CCA, there are several legal mechanisms set up for support mainstreaming, both in the public sector, and by private entities:

4.2.1 The NCCAP as the main tool for mainstreaming climate change actions

Both national and county governments mainstream climate change responses into development planning, decision making and implementation in all sectors of the economy ((s.3(2)(a)). The National Climate Change Action Plan (NCCAP) is the principal legal tool through which mainstreaming will be undertaken. Section 13 requires the NCCAP, developed by the Cabinet Secretary every five years, to set out actions for mainstreaming climate change responses into sector functions. Section 13(9) provides that once an NCCAP has been adopted by the National Climate Change Council. In this sense, the Council provides a strong, high level institutional structure to mainstream climate change, including the focus on attaining sustainable development.

Once it has been approved by the Council, the Cabinet Secretary, all public bodies, and any person or entity engaged in climate change governance and administration shall, when exercising any power or discharging any statutory duty or function, be bound by the contents of the National Climate Change Action Plan. As indicated earlier, Kenya is currently developing the NCCAP for the 2018-2022 period (see draft, and other working documents: http://www.kcckp.go.ke), after the five year term of the 2013-2017 NCCAP ran out, due to requirements by the CCA for the NCCAP to be reviewed every five years.

4.2.2 Requirement for public entities at national government level to establish climate change units to coordinate mainstreaming of climate change actions into various sectors

The CCA, through section 15(5), places specific public duties on each State Department and national government public entity (e.g. State Corporations, Constitutional Commissions), in order to mainstream climate change into their sectoral mandates:

- integrate the climate change action plan into sectoral strategies, action plans and other implementation projections for the assigned legislative and policy functions;
- report on sectoral greenhouse gas emissions for the national inventory;
- regularly monitor and review the performance of the integrated climate change functions through sectoral mandates;
- put in place and implement mechanisms for sustainability in performance of sectoral mandates.

In addition, each State Department and national government public entity is required to designate a Climate Change Unit (CCU) with adequate staff and financial resources. It is important to highlight that the CCU is not a focal point, but a fully functional unit, with clear terms of reference, competent staff, and a budget to facilitate operations. It is notable that the law requires each CCU to be headed by a Senior Officer, who has sufficiently high ranking within the relevant department or agency, to allow for them to coordinate colleagues who are undertaking the actual mainstreaming work. As an oversight mechanism, through the National Assembly, State Departments under which all these agencies fall are required to report annually to the Council on the status and progress of performance and implementation of all assigned climate change duties and functions.

Section 15(1) of the CCA also empowers the Council to impose climate change duties on any public sector agencies at the national government, and the county government level, in addition to those specified. More specifically, in addition to mainstreaming the NCCAP actions through the County Integrated Development Plans, each Governor is required to nominate a specific County Executive Committee Members as being responsible for climate change affairs within the county.

The process of developing and imposing these duties should be preceded by public consultations and awareness. A streamlined approach to implementing the NCCAP prioritized climate change actions, that makes use of the mainstreaming approach, climate change duties (for public and private sector), and robust public participation will provide a valuable opportunity to focus on the balancing of interests that leads to sustainable development.

4.2.3 Mainstreaming the NCCAP into the development planning process

Since climate change is a development challenge that causes adverse impacts and vulnerability across the economy, society and environment, it is imperative to incorporate the NCCAP climate action priorities into the national development planning process. In Kenya, at the national level, this is currently undertaken in context of Vision 2030, through the five-year Medium-Term Plans (MTPs,) such as the most recent one, MTP 2, approved for the 2013-2017 period. It is these priorities from the MTP that inform the process of budgeting undertaken by the National Treasury.

The development of the 2018-2022 MTP III has coincided with the development of the 2018-2022 NCCAP. For this reason, it became clear that in terms of the legal requirement for the mandatory mainstreaming of the NCCAP into all sectors of the economy, the 2018-2022 MTP provided a critical pathway to do this for the first time. A study was conducted by the State Department of Planning which resulted in the a 2017 report "Supporting the Mainstreaming of Climate Change into Kenya's Medium Term III." This report noted that the MTP II (2013-2017) made initial progress towards mainstreaming of climate change across different sectors, with identification of climate change as an issue that threatens Kenya's economic growth. MTP II then identified actions to address climate change, many of them recommended in the NCCAP for the 2013-2017 period. Indeed, the implementation of the 2013-2017 NCCAP was a priority of the environment, water and sanitation sector of the MTP II. The MTP development process is structured in the form of sectoral Working Groups.

The 2017 report made key recommendations on how, based on the law, policy and institutional framework, Kenya can structure the roles of public institutions and other stakeholders, including the public to support the process of mainstreaming the NCCAP into the MTP by the national government:

1. ***The Climate Change Directorate (CCD) should co-convene the Climate Change Thematic Working Group, to act in an advisory and peer review role to the Sector Working Groups and County planning teams***

It was recommended that Kenya should convene a Climate Change Thematic WG (CCTWG), under the guidance of the CCD, to provide an advisory and review function for MTPIII inputs. For example, with respect to the development of assessment criteria to be used in prioritizing projects, programmes and policies, the CCTWG should provide advice and review the criteria, priorities and the decision-making processes.

Based on this recommendation, a Climate Change Thematic Working Group (CCTWG) was convened chaired by the Principal Secretary responsible for climate change, and the CCD serving as the Secretary. The membership of the CCTWG is drawn from public entities, private sector and CSOs, comprising 71 members. The CCTWG also consultative developed a guidance report into the mainstreaming of prioritized climate change actions into MTP III.

2. ***Sector working groups should be encouraged to prioritise NCCAP actions in their sector inputs, as well as to align all projects with the climate change policy intent i.e. applying a climate lens***

The 2017 report on mainstreaming by the State Department of Planning, proposed that the various MTP sector working groups should focus on the selection of priority climate actions that add value to adaptation in their sectors.

- In this activity, the WG will select actions to include in the sector inputs by referring to the NCCAP. In doing so, the WG will review priority adaptation actions by sector (Table 5.1 of the 2013-2017 NCCAP) and suggested priority low-carbon development opportunities (Table 6.2 of the 2013-2017 NCCAP). The WG should select at least one or as many appropriate activities given practical implementation challenges, resource constraints and alignment with the sector's development priorities.
- Subsequently, the Working Groups should estimate the cost of the selected actions including the budgetary requirements to implement the selected adaptation and mitigation actions. This should be included in the implementation matrix of the MTPIII, sector plans and CIDPs.
- The Working Group should also determine barriers to implementation and the resources required. In so doing, the WG should consider how selected projects can be implemented, including through an assessment of institutional arrangements and capacity with a consideration of devolution of certain functions and concurrent functions, the need for regulatory reform, capacity building, evidence generation and data availability to inform decision making.

3. ***Undertake structured stakeholder engagement at the county level***

The report further recommended that the Integration of the MTPIII planning process with county-level actions is imperative. This follows the provisions of section 19 of the CCA which explicitly requires County Governments to mainstream climate change actions and duties contained in the CCA and the NCCAP, in performance of its functions. More specifically, s.19(2) requires county governments to mainstream implementation of the NCCAP, during development, updating and approval of CIDPs, and County Sectoral Plans required for CIDP implementation by the County Governments Act.

Therefore, the MTP III Working Groups will undertake stakeholder engagement with county governments (who are not part of the MTP process, as they plan through CIDPs), and consultations with the public and other key stakeholders. Such a stakeholder engagement should aim to build awareness and capability (collaborating with UNDP and potentially other development partners); inform them on the methodology for mainstreaming climate change actions into the MTP III.

4.3 Specific requirements of the CCA to mainstream climate change into strategic policy areas

The CCA, consistent with the climate change policy contains provisions that explicitly require that the government undertakes mainstreaming with respect to certain sectors of the economy:

- Education – in mandatory terms, section 21 of the CCA requires the Kenya Institute of Curriculum Development, on the advice of the Council, to integrate climate change into various disciplines and subjects of the national basic education curricula, at all levels.
- Environmental assessments – Section 20 requires NEMA to carry out integration of climate change risks, by integrating climate risk and vulnerability assessment into all forms of assessment and liaise with relevant agencies for their technical advice. This is consistent with article 69(a) of the Constitution which places an obligation on the government to establish systems of environmental impact assessment, environmental audit and monitoring of the environment; and to eliminate processes and activities that are likely to endanger the environment.

- Disaster and public safety – The CCA, through section 13, requires that a NCCAP should include provisions to mainstream climate change disaster risk reduction actions in development programmes; and should set out a structure for public awareness and engagement in climate change response and disaster reduction.

  Section 18 provide more specific guidance, making provision for the Council to annually, on the advice of the Cabinet Secretary, to identify priority strategies and actions of disaster risk reduction related to climate change and -

  - advise the President to require incorporation of this priority strategies and actions into functions and budgets of each State Department, state corporation and other national government entities;

- advise a county government on priority strategies and actions that should be integrated into functions and budgets of departments and entities of the county governments; and
- develop a specific public safety component for disaster risk reduction for incorporation by all levels of government to prevent climate change induced disasters and manage emergency responses.

These special areas, which are considered strategic also impact the country uniquely. For instance, mainstreaming of climate change into the basic education curriculum provides a pathway to educate and convert millions of school children, who form the future generation of Kenyans, into champions on climate change. Integrating climate risk assessments into environmental assessments (Strategic and project-based EIA, as well as audits) provides a wider technical and legal approach to mainstream climate risks and vulnerabilities, and plan how to ensure projects and activities a climate proofed. In addressing disasters through mainstreaming, it is supportive to the ongoing prioritization of adaptation and disaster risk reduction focuses on isolating climate hazards that combine with vulnerabilities to result in disasters.

4.4 Climate financing

The national goal in addressing climate change by following a low carbon climate resilient development pathway involves processes and climate actions that require to be financed. In terms of adaptation for instance, the climate proofing of infrastructure such as roads can be costly; while mitigation measures such as clean energy, or waste management are capital intensive. Innovation, research and development are critical to the country's selection and prioritization climate change actions for mainstreaming through the NCCAP, and all other relevant processes and institutions, as previously highlighted here. Climate financing is therefore critical to a balanced approach to framing response actions, and this is recognized by both the 2016 National Climate Change Policy, and the 2016 CCA. According to the policy:

> Kenya continues to face tremendous climate change challenges that require mitigation and adaptation interventions. Prudent management of resources requires a balance in the allocation of mobilized resources to both mitigation and adaptation to address the climate change needs of the country. Criteria should be developed to identify an appropriate allocation of resources in a manner that proportionately responds to both climate resilience and low carbon priority needs.

While the policy takes the broader approach of climate financing and includes various sources of funds from international entities; public funds, private investments, etc., the CCA has established a Climate Change Fund as the mechanism for aggregating climate finances from whatsoever sources, and administering, allocating and disbursing the funds to the various recipients using government procedures. For this reason, in terms of section 25 of the CCA, the fund is under the oversight of the Council, and is administered by the Principal Secretary responsible for climate change affairs. This fund, which is yet to be set up, would applied to relevant climate change actions including:

- Providing grants for climate change research and innovation in industrial and technology research, policy formulation, scientific research, and academic research.
- Providing grants and loans to business, industry, civil society, academia and other stakeholders for development of innovative actions that benefit climate change responses in Kenya.
- Provide finance, through grants and loans for the innovation of climate change adaptation and mitigation actions.
- Provide technical assistance to county governments.

Kenya has developed a 2016 Climate Finance Policy, through the National Treasury, which sets out a number of strategic interventions that can encourage the mobilisation of climate finance and increase financial flows. These interventions include the establishment of a national climate finance platform (a Climate Change Fund) that can support the mobilization, coordination and tracking of climate finance in Kenya including both domestic and international resources. This will improve transparency and accountability. The policy encourages building capacity to develop bankable projects and effectively manage and implement those projects. Improved fiduciary standards and management, and application of environmental and social safeguards will encourage participation in climate finance investments and benefits sharing.

There is however confusion concerning the Climate Change Fund established by the CCA, since in addition to the Climate Finance Policy, the National Treasury has in 2018 published the Draft Public Finance Management (Climate Change Fund) Regulations, for public debate. These regulations are not being made pursuant to section 25 of the CCA, but under authority given by the Public Finance Management Act (PFMA), which under section 23 provides as follows:

> Section 23 -
>
> > (4) The Cabinet Secretary may establish a national government public fund with the approval of the National Assembly.
> >
> > (5) The Cabinet Secretary shall designate a person to administer every national public fund established under subsection (4).

> (6) The administrator of a national public fund shall ensure that the earnings of, or accruals to a national public fund are retained in the fund unless the Cabinet Secretary directs otherwise.

A conflict is therefore evident between provisions of the CCA, and those of the PFMA, although the draft regulations developed by the National Treasury have copied the objectives of the Climate Change Fund, and the mandate of the Council with respect to the Fund under the CCA.

Climate financing is an important aspect of balancing out the priorities required for adaptation and mitigation, and a publicly operated climate change fund, such as those discussed here, are important but not exhaustive. There is need to give effect to the ambitions of the Climate Finance Policy to establish a broad climate finance platform that provides strategic directions and preferences for the application of climate funds within Kenyan priorities. This can be adopted by interested persons and stakeholders, including the private sector.

Further reading:

- Intergovernmental Panel on Climate Change (IPCC) Working Group II: Impacts, Adaptation and Vulnerability. 18.5. Adaptive Capacity and its Determinants 18.5.1. Vulnerability and Adaptive Capacity.
- Kenya, Supporting the Mainstreaming of Climate Change into Kenya's Medium Term III (Nairobi: State Department of Planning and Statistics, 2017)
- Public Finance Management Act, 2012
- Public Finance Management (Climate Change Fund) Regulations, 2018
- Republic of Kenya, Draft Report of the Climate Change Thematic Working Group on the Third Medium Term Plan 2018-2022
- State Department of Planning and Statistics, Membership of the Climate Change Thematic Working Group for the MTP III process.

5.0 CONCLUDING THOUGHTS

The political economy analysis of climate change interventions in Kenya has been undertaken in reference to the constitutional focus on pursuit of sustainable development, the impacts of climate change, the role of various stakeholders, and how various strategic actions could be executed. This political economy analysis concurs that in order to have a win-win outcome, or a result where most of the stakeholders benefit from climate change action, Kenya needs to pursue the prioritization of adaptation to climate change, and the explicit embracing of building resilience and enhancing adaptive capacity as critical steps to dealing with the vulnerability resulting from the adverse impacts of climate change. This does not mean the country will not implement mitigation actions. In addition, Kenya will need to enhance application of the mainstreaming approach as the mechanism for delivering on climate change actions. This is an approach that requires operationalization of the complex institutional framework at the national and county government level to support the mainstreaming of climate change actions.

This policy brief examined the role of the various actors, at different scales, and attempted to provide insight on how enhanced stakeholder engagement can contribute to Kenya's socio-economic and environmental transformation towards fulfilment of sustainable development.

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6.0 SELECT REFERENCE MATERIALS

1. Access to Information Act, No. 31 of 2016
2. Climate Change Act, No. 11 of 2016
3. Constitution of Kenya, 2010
4. Environment Management and Coordination Act, 1999
5. Kenya, Sessional Paper No.5 of 2016 on National Climate Change Framework Policy. Online: http://www.kcckp.go.ke/download/nccap/downloads/Climate-Change-Framework-PolicyMay20171.pdf
6. Kenya, National Climate Change Action Plan 2018-2022 Volume II: Adaptation Technical Analysis Report, Ministry of Environment and Forestry. Online: http://www.kcckp.go.ke/download/Adaptation-Technical-Analysis-Report-2018-2022.pdf
7. Kenya, Supporting the Mainstreaming of Climate Change into Kenya's Medium Term III (Nairobi: State Department of Planning and Statistics, 2017)
8. Kenya, Nationally Determined Contributions, July 2015.
9. Murphy, D. and Chirchir, D. (2017), Review of the Implementation of the Kenya National Climate Change Action Plan 2013- 2017. StARCK+ Technical Assistance to the Government of Kenya. Online: http://www.kcckp.go.ke/download/nccap/downloads/Review-of-the-Implementation-of-the-NCCAP-2013-2017_2.pdf
10. Intergovernmental Panel on Climate Change (IPCC) Working Group II: Impacts, Adaptation and Vulnerability. 18.5. Adaptive Capacity and its Determinants 18.5.1. Vulnerability and Adaptive Capacity
11. Sessional Paper No. 10 of 2012 on Kenya Vision 2030
12. Sessional Paper No.5 of 2016 on National Climate Change Framework Policy
13. United Nations General Assembly. 70/1. Transforming our world: the 2030 Agenda for Sustainable Development (A/RES/70/1 Sustainable Development Goals)
14. Rio Declaration on Environment and Development (1992)
15. The 1998 UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).
16. Revised (2003) African Convention on the Conservation of Nature and Natural Resources. (specifically article 16 on Procedural Rights)
17. Public Benefits Organizations Act, 2013 (No. 18 of 2013)
18. Report on 8th Presidential Roundtable by KEPSA & Government Leadership: Unlocking Potential on Private Sector Participation in the Big Four Agenda.
19. 2013-2017 Medium Term Plan for Vision 2030
20. 2015-2030 Kenya National Adaptation Plan: Enhanced climate resilience towards the attainment of Vision 2030 and beyond

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POLICY BRIEF

POLITICAL ECONOMY OF CLIMATE CHANGE INTERVENTIONS IN KENYA: WHO BENEFITS AND WHO LOSES?

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