Stockholm Environment Institute

Supported by:
Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection
based on a decision of the German Bundestag
IKI INTERNATIONAL CLIMATE INITIATIVE

ADDRESSING CLIMATE FINANCE POLICY GAPS IN THE EWASO NG'IRO NORTH CATCHMENT AREA:

Strengthening Frameworks for Ecosystem-Based Adaptation and Sustainable Development



CETRAD Centre for Training and Integrated Research in ASAL Development

PIK

MID-P Collective Action: Resilient Society

National Drought Management Authority NDMA



About SEI

Stockholm Environment Institute (SEI) is an international non-profit research institute that tackles climate, environment and sustainable development challenges.

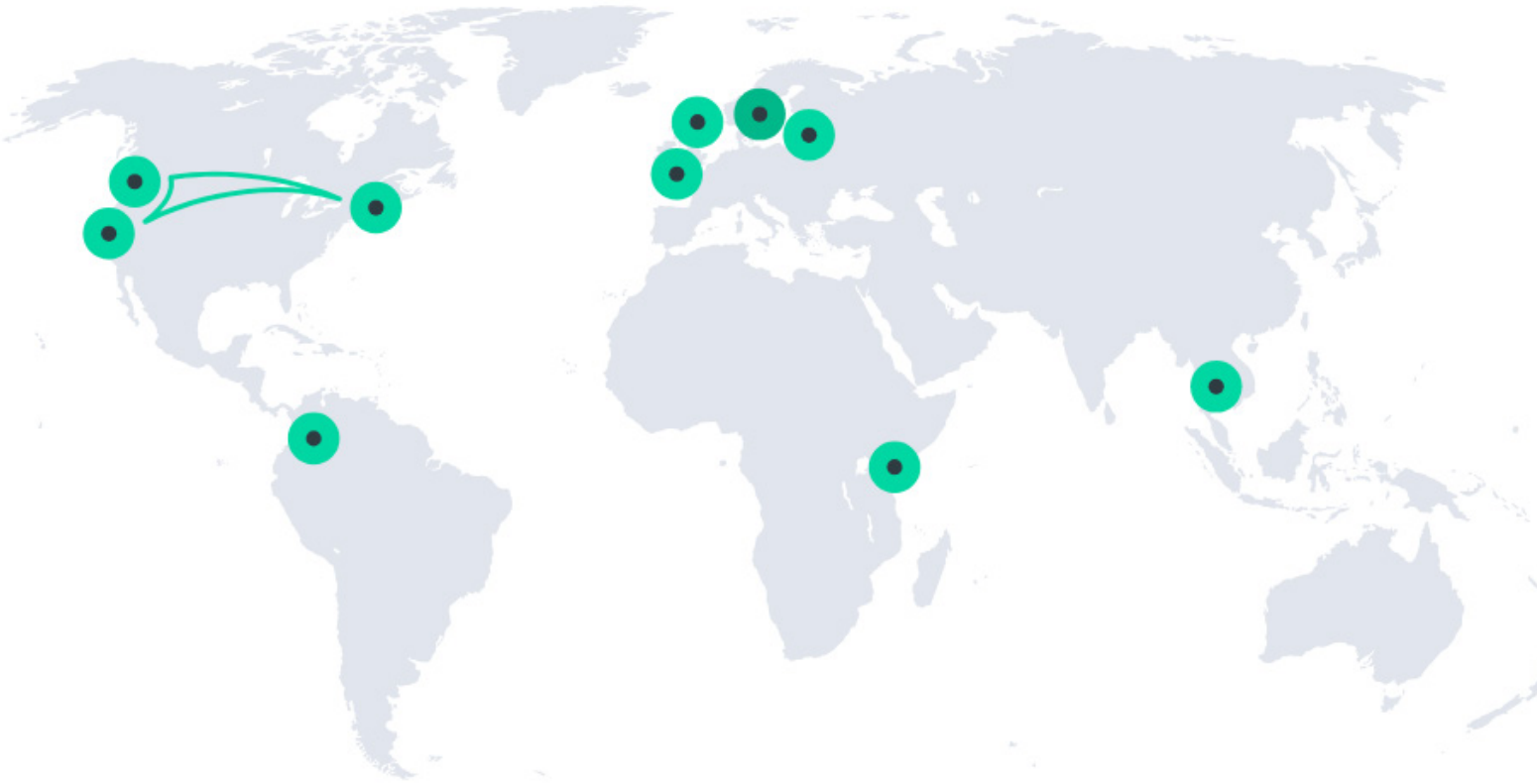
We empower partners to meet these challenges through cutting-edge research, knowledge, tools and capacity building. Scientific quality and integrity are foundations of our work. Partnership is at the heart of our approach, leading to change that lasts.

Our work connects science to policy and practice, aiming to drive tangible impacts. It spans climate change, natural resources, water, air, and health, and addresses questions of governance, innovation, finance, poverty, gender equality and social equity.

We are committed to transparency and full disclosure of our funding. The Government of Sweden is our largest funder, and we also receive funds from a range of public research funders, philanthropic foundations, bilateral and multilateral development agencies, governments, NGOs and other partners.

Through SEI's HQ and seven centres around the world, we engage with policy, practice and development action for a sustainable, prosperous future for all.

SEI'S PRESENCE GLOBALLY



SEI CENTRES

SEI Headquarters

SEI Africa

SEI Asia

SEI Latin America

SEI Oxford

SEI Tallinn

SEI US

SEI York

About the Project

Applying the water-energy-food nexus to promote ecosystem-based adaptation in the Ewaso Ng'iro North Catchment, Kenya

This project seeks to support the Government of Kenya, five county governments (Laikipia, Samburu, Isiolo, Meru and Nyeri), local communities, and agro-based private enterprises to promote ecosystem-based adaptation practices and integrated planning for water, energy, agriculture and land use for resilient livelihoods in the Ewaso Ng'iro North Catchment Area.

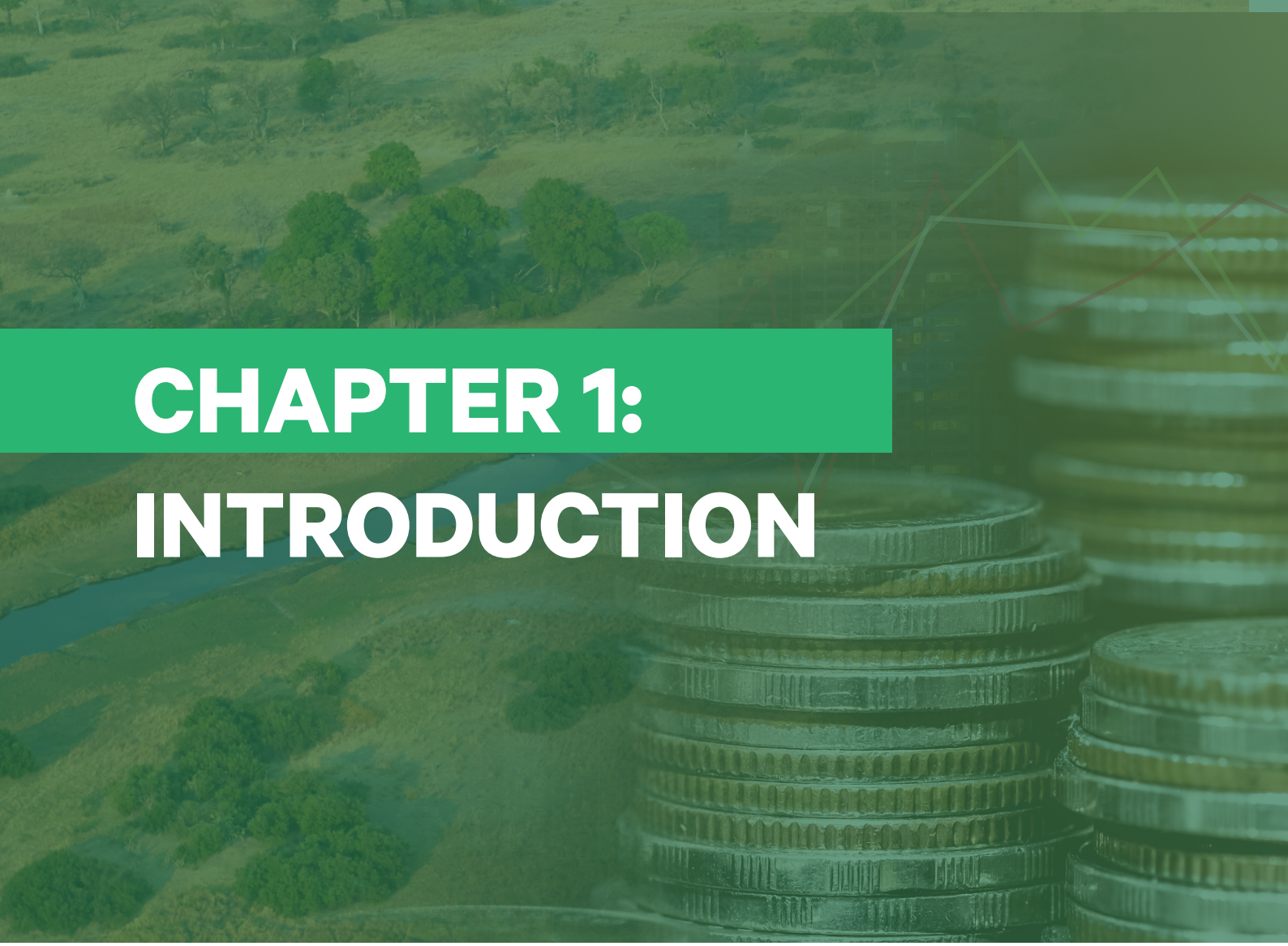
The project seeks to apply ecosystem-based adaptation (EbA) and the nexus approaches to facilitate the co-production of resilient water-energy-food (WEF) knowledge with stakeholders (policymakers, local community groups, private sector, and non-governmental organizations) to inform decision and policymaking.

The project will contribute towards several development objectives which are in line with the Kenya Vision 2030 priorities, the Ewaso Ng'iro North Development Area (ENNDA) Integrated Regional Development Plan (2010-2040), the ENNDA catchment management strategy and the reformulation and implementation of CIDPs. These include increasing food security, especially pastoral livestock production; resilience through livelihoods diversification; employment creation through EbA solutions; agricultural growth; the conservation and safeguarding of critical habitats, including wildlife-protected areas and community wildlife conservancies. At the governance level, the nexus approach is expected to promote cooperation among actors and policy coherence across "policy silos", i.e. sectors, levels and scales and the key added value of the nexus approach is in integrating across the various plans and strategies, promoting synergies and generating co-benefits.

Expected results

- WEF nexus models and development scenarios for Ewaso Ng'iro North Catchment Area (ENNCA)
- Identification, validation, and promotion of innovative Ecosystem-based nexus solutions among key stakeholders in the ENNCA region
- Increased awareness of cross-sectoral interactions (water, energy, agriculture, and land) during the implementation, upscaling, out scaling, and transfer of ecosystem-based nexus solutions at the sub-national and national level





CHAPTER 1: INTRODUCTION

The Stockholm Environment Institute (SEI) has been leading a consortium of partners to implement a project supporting ecosystem-based adaptation (EbA) in the Ewaso Ng'iro North Catchment Area (ENNCA). The ENNEbA project, funded by the German Government through the Federal Ministry for the Environment, Nature Conservation, Nuclear Safety, and Consumer Protection (BMUV), aims to ensure that people, animals, and ecosystems in the Ewaso Ng'iro North Catchment Area have *access to sufficient water and energy, experience improved food security, and build resilience to climate change impacts, all while advancing toward a low-carbon green economy.*

The project brings together key stakeholders, including the National Drought Management Authority (NDMA), Centre for Training and Integrated Research in ASAL Development (CETRAD), Merti Integrated Development Programme (MID-P) and Potsdam Institute for Climate Impact Research (PIK), to enhance climate resilience and sustainability in the region.

Located in northern Kenya, ENNCA spans ten counties and is home to approximately four million people. The ongoing project is being implemented in five of these counties – Laikipia, Isiolo, Samburu, Meru, and Nyeri – within a region experiencing rapid development and transitions in agriculture, energy systems, water, and land use. Key infrastructure initiatives, including the construction of a mega dam along the Ewaso Ng'iro River, the Isiolo City resort, and the Lamu Port-South Sudan-Ethiopia-Transport (LAPSSET) Corridor project, align with Kenya's Vision 2030 strategy, which seeks to transform the country into a newly industrialised, middle-income nation that provides a high quality of life for all citizens.

The competition for water, land, biomass, and energy resources is expected to intensify as population growth accelerates. Additional pressures will arise from the expansion of upstream commercial agriculture, rapid urbanisation, and the impacts of climate variability and change – particularly droughts and floods. These combined factors will drive higher rates of water abstraction for irrigation, reducing availability for downstream users, especially during dry seasons. Moreover, they will contribute to land degradation, ecosystem loss, and significant threats to water, food, and energy security.

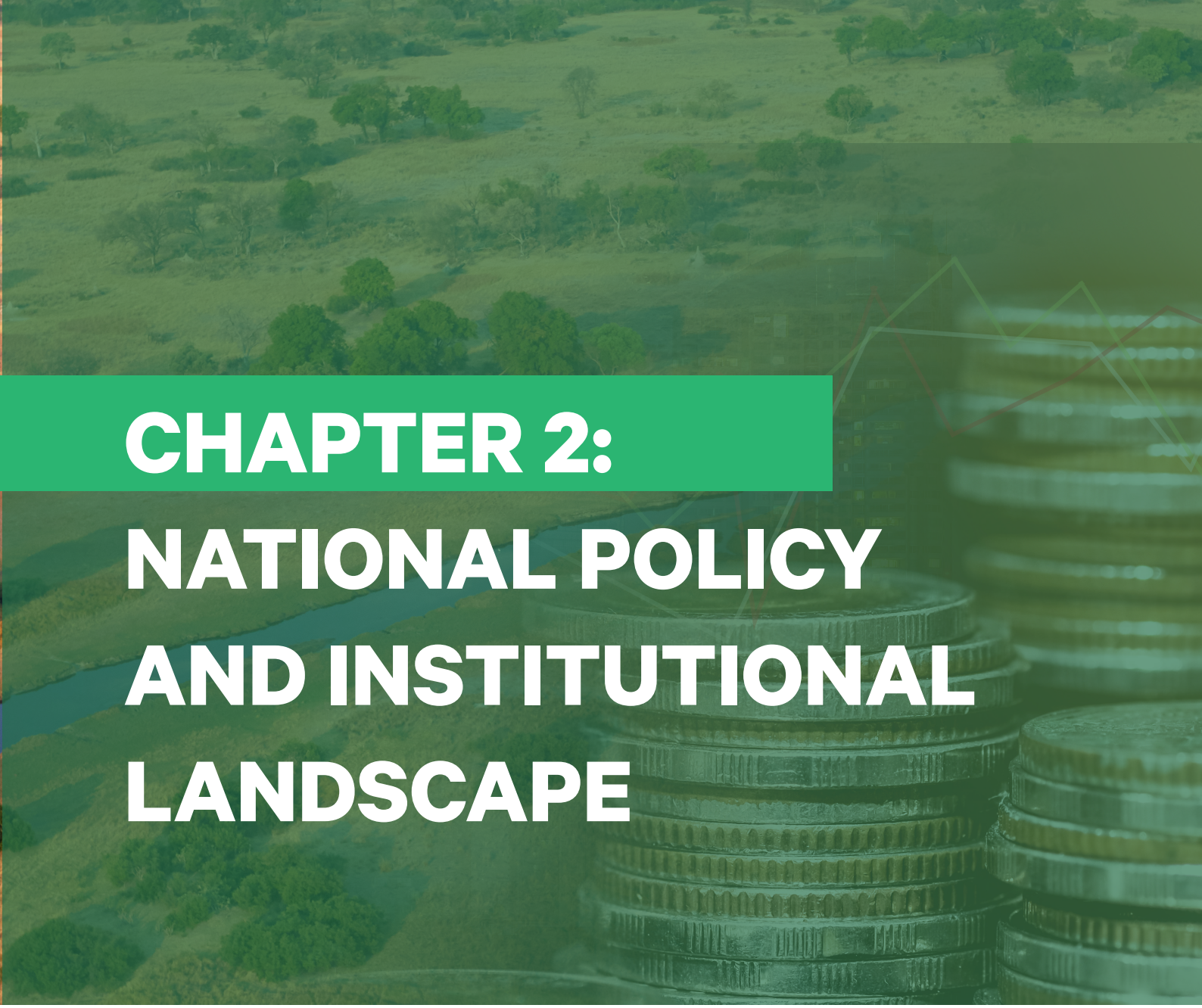
Kenya acknowledges the significant risks these challenges pose to its Vision 2030 strategy and emphasises the need to integrate climate action and the Sustainable Development Goals (SDGs) into its development agenda. To this end, the country is implementing key interventions, including the National Adaptation Plan (NAP), Nationally Determined Contribution (NDC), Long Term Low Emission Strategy (LTS), National Climate Change Action Plan (NCCAP), among others, to enhance climate change resilience and sustainability. These strategic and policy interventions are anchored within a legal framework – the Climate Change Act, 2016.

Climate finance remains a critical enabler of Kenya's adaptation ambitions under the Enhanced Nationally Determined Contributions and the National Climate Change Action Plan (NCCAP). However, the policy and institutional landscape governing climate finance in Kenya continues to exhibit fragmentation, underutilisation of innovative instruments, and limited localisation of finance flows. In particular, the integration of Nature-based Solutions (NbS) and Ecosystem-based Adaptation (EbA) into national financing strategies remains nascent, despite their prominence in global adaptation frameworks such as the Kunming-Montreal Global Biodiversity Framework and the UNFCCC's Global Goal on Adaptation.

Ecosystem-based Adaptation (EbA), a key approach to strengthening climate resilience and promoting sustainable development, is central to the objectives of the present project and plays a crucial role in Kenya's broader climate change adaptation strategy. By incorporating EbA with nexus approaches, this project aims to holistically address climate-related and environmental pressures within the energy-water-food nexus. This integrated strategy fosters adaptability, enhances ecological resilience and sustainability, and supports long-term socio-economic development, and is therefore aligned with the broad objective of Vision 2030.

This report summarises the findings from a sub-objective of the project, focusing on the integration of climate finance and ecosystem-based adaptation into the county-level climate change planning and implementation. The analysis is largely based on a review of key environmental and climate change regulatory and policy frameworks, as specified in the Terms of Reference, complemented by reports from teams responsible for implementing other components of the project. Specifically, the report examines the climate finance landscape across the five target counties (Laikipia, Isiolo, Samburu, Meru, and Nyeri), identifies key policy gaps, and provides recommendations to strengthen regulatory frameworks for sustainable development.

The report is structured into three sections: a review of the climate finance policy landscape across the five counties, focusing on the domestication of national policies, regulations, and guidelines; an assessment of policy gaps with corresponding recommendations; and an examination of the role of private sector actors and private finance in advancing Ecosystem-based Adaptation (EbA).



CHAPTER 2: NATIONAL POLICY AND INSTITUTIONAL LANDSCAPE

Kenya's climate finance architecture is anchored in the Climate Change Act (2016), the Public Finance Management Act (2012), and the National Climate Change Action Plan (NCCAP). The National Treasury leads resource mobilisation, while the Climate Finance and Green Economy Unit – also housed within the National Treasury – coordinates climate-related fiscal planning.

This section analyses major national climate change strategies and action plans, focusing on their implications for county-level governance and implementation. The analysis focuses on five key national climate policy instruments: the third National Climate Change Action Plan (2023–2027), the updated Nationally Determined Contribution (NDC II), the Long-Term Strategy (LTS), the National Adaptation Plan (2015–2030), and Vision 2030 (and its fourth medium-term plan). Whilst these are not the only climate change-related legislative frameworks recently enacted in Kenya, their analysis provides a broad perspective on how counties are addressing climate change and, specifically, the integration of EbA into county strategies and action plans. This approach also aligns with the Terms of Reference for the assignment.

2.1 THE NATIONAL ADAPTATION PLAN 2015-2030

The **National Adaptation Plan (NAP) 2015-2030** was developed in recognition of the profound impact of climate change on Kenya's economy and people, given the country's heavy reliance on climate-sensitive natural resource sectors for socioeconomic stability and growth. Consequently, adaptation is essential to safeguard development. Kenya's National Adaptation Plan focuses on Ecosystem-Based Adaptation (EbA) to strengthen resilience in areas such as agriculture, water resources, and forestry, highlighting the importance of safeguarding and restoring ecosystems to provide vital services and support climate mitigation efforts[1]. The plan also aligns with Article 7.9 of the Paris Agreement, which stipulates that *"each Party shall, as appropriate, engage in adaptation planning processes and the implementation of actions, including the development or enhancement of relevant plans, policies, and/or contributions."*

Conflicting policies between the national and county governments have resulted in fragmented responsibilities and overlapping functions among public agencies. This fragmentation is expected to compromise the country's long-term development objectives set out in Kenya Vision 2030, as well as hinder the progress towards the United Nations' Sustainable Development Goals (SDGs) concerning hunger, water, and energy Based on the NAP, counties are encouraged to integrate EbA into their development strategies to enhance climate resilience.

Key recommendations for counties include:

- **Mainstream EbA into County Integrated Development Plans (CIDPs):** Ensure climate adaptation strategies are aligned with local governance and development priorities.
- **Strengthen Ecosystem and Community-Based Approaches:** Promote nature-based solutions such as reforestation, watershed management, and conservation agriculture to reduce vulnerability to climate impacts.
- **Enhance Climate Information Services:** Improve access to timely and accurate climate data, integrating indigenous knowledge into local adaptation planning.
- **Promote Sustainable Land and Water Management:** Develop policies that balance competing land, water, and energy demands, while protecting natural ecosystems.
- **Encourage Private Sector and Community Participation**: Engage stakeholders in financing and implementing EbA interventions, fostering climate-smart investments.
- **Monitor and Evaluate Adaptation Efforts:** Establish clear indicators to track progress, ensuring adaptive measures remain effective and scalable.

[1]The vision of this NAP is enhanced climate resilience towards the attainment of Vision 2030. (Government of the Republic of Kenya. (2018). Kenya Climate Resilience Strategy.)

With respect to climate finance, NAP emphasises the need for counties to enact and implement mechanisms to enhance access to funding for adaptation efforts. Key points include:

Key points include:

- **County Climate Change Funds (CCCFs):** Currently, nearly all counties in Kenya, including the five target counties, have set up CCCFs to support local adaptation priorities. The forthcoming section will examine the extent to which these funds have been, or are being, implemented across the five counties.
- **Integration with National Climate Finance Mechanisms:** Counties are encouraged to align their financing strategies with national frameworks, including the Kenya Climate Fund, the Green Climate Fund (GCF), and other international sources.
- **Strengthening Governance and Coordination:** The plan recommends that counties improve financial tracking systems and Establish and operationalize institutional capacity, County Climate Change Units (CCUs) to effectively coordinate and manage climate funds.
- **Private Sector Engagement:** Counties should explore partnerships with private sector actors to mobilise additional resources (blended Finance) for climate adaptation. This report will feature a case study examining the potential for counties to leverage county green bonds as a mechanism for securing private finance to support climate adaptation efforts.
- **Policy and Regulatory Frameworks:** Strengthening county-level policies to facilitate climate finance access and ensure funds are used effectively for resilience-building.

2.2 THE LONG-TERM STRATEGY 2050

Long-Term Strategies (LTS) are established under Article 4, paragraph 19 of the Paris Agreement, which urges all Parties to formulate and *communicate long-term low greenhouse gas emission development strategies.* This should be done within the context of Article 2 of the United Nations Framework Convention on Climate Change (UNFCCC) that acknowledges the *principle of common but differentiated responsibilities and respective capabilities, and varying national circumstances.*

While the UNFCCC's guidance on long-term strategies focuses on conveying a Party's long-term ambitions for greenhouse gas reductions, Kenya's LTS also integrates an adaptation goal. This is because adaptation is Kenya's foremost priority, with mitigation efforts being pursued only to the extent that they *yield both adaptation and socio-development co-benefits*. Specifically, Kenya's LTS has estimated the *level of investment and adaptation cost associated with the Representative Concentration Pathways (2.6 and 8.5) global projections.*

The key recommendations from the LTS on ecosystem-based adaptation (EbA) and climate finance relevant to the five counties include:

Key recommendations include:

- **Forest Restoration and Conservation:**
  - » Advance afforestation and reforestation initiatives to meet Kenya's target of 580,000 hectares annually by 2030, prioritising degraded areas and arid and semi-arid lands (ASALs) to strengthen carbon sequestration and biodiversity conservation.
  - » Support Kenya's goal of achieving a 65% reduction in deforestation by 2050 (compared to 2002-2018 levels) through sustainable land management, community-driven conservation initiatives, and the promotion of alternative livelihoods, including sustainable charcoal production.
- **Sustainable Land Management (SLM):**
  - » Promote climate-smart agricultural practices (e.g., agroforestry and intercropping) to improve soil health and resilience to droughts.
  - » Implement Sustainable Agricultural Land Management (SALM) techniques to offset crop yield losses and reduce land degradation.
  - » Upscale drought-resistant crop varieties and indigenous knowledge in farming.
  - » Improve pasture management and water-efficient livestock systems to reduce pressure on grazing lands.
- **Water Resource Management:**
  - » Restore critical wetlands and implement nature-based flood control (e.g., vegetative buffers along rivers) to enhance water retention and reduce flood risks.
  - » Expand small-scale water storage (e.g., sand dams, rooftop harvesting) in drought-prone areas and adopt nature-based solutions like artificial aquifer recharge to address water scarcity.

[2]Representative Concentration Pathways (RCPs) are climate change scenarios designed to project future greenhouse gas concentrations. Initially, four RCPs were established: RCP2.6, RCP4.5, RCP6, and RCP8.5. Among them, RCP2.6 represents the lowest greenhouse gas concentration trajectory, while RCP8.5 corresponds to the highest.

- **Mobilize International Support:**
  - » Secure funding for high-impact sectors like forestry, energy, and agriculture, which require 73% international support (per the LTS cost estimates) by leveraging partnerships with both bilateral and multilateral funders to access grants and concessional loans.
- **Local Resource Mobilization:**
  - » Counties should integrate climate finance into County Integrated Development Plans (CIDPs) and allocate budgets for adaptation projects. The next section of the report examines the current CIDPs (2023–2027) to evaluate whether the five counties have complied with this requirement and/or recommendation.
  - » Establish county-level climate funds (e.g., the County Climate Change Fund (CCCF) Mechanism) to support community-based adaptation (e.g. drought-resistant crops, water storage).
- **Innovative Finance Mechanisms:**
  - » Develop carbon credit programmes (e.g., REDD+) to monetise forest conservation initiatives.
  - » Explore public-private partnerships (PPPs) for scalable EbA projects (e.g., eco-tourism, sustainable forestry, renewable energy).
- **Policy Implementation:**
  - » Enforce and implement national policies and strategies like the Climate Change Act (2016) and the National Climate Change Action Plan (NCCAP) at the local level, ensuring alignment with county priorities.
  - » Strengthen enforcement of forest protection laws, including the Forest Conservation and Management Act (2016).
  - » Mainstream EbA into CIDPs, County Spatial Plans and Disaster Risk Reduction (DRR) strategies.
  - » Designate County Climate Change Units (CCUs) to coordinate adaptation efforts and mainstream EbA into sectoral plans.
- **Community Engagement:**
  - » Empower local communities (e.g., through Charcoal Producer Associations and women and youth groups) to participate in forest management and sustainable livelihoods such as the establishment of agroecology and forest conservation enterprises.
  - » Strengthen early warning systems for droughts/floods and promote indigenous knowledge in adaptation.
- **Monitoring and Reporting:**
  - » Track progress on afforestation, water access, and SLM using Geographic Information System (GIS) tools and report to the Climate Change Directorate (CCD).
  - » Collaborate with national agencies to validate data and access climate finance.

2.3 NATIONAL CLIMATE CHANGE ACTION PLAN III (2023-2027)

Kenya's **National Climate Change Action Plans (NCCAPs)** serve as the country's primary instrument for implementing climate action, as mandated by the **Climate Change Act, 2016**, which was amended in 2023 to incorporate provisions for carbon trading. They are strategically aligned with **Medium-Term Plans (MTPs)** to ensure climate change is effectively integrated into national development planning. NCCAP III, covering the **2023-2027 planning period**, is thus aligned with **Medium-Term Plan IV (MTP IV)** for the same timeframe.

The key recommendations of the **NCCAPs** III (2023–2027) on **climate finance** and **ecosystem-based adaptation (EbA)** for counties include:

Key recommendations include:

- **Operationalize County Climate Change Funds (CCCFs):**
  - » Allocate at least 1.5% of county development budgets to CCCFs to support locally-led climate actions.
  - » Strengthen governance structures to ensure transparent and equitable disbursement of funds.
- **Enhance Access to National and International Climate Finance:**
  - » Build county capacity to develop bankable climate projects for funding from mechanisms like the Green Climate Fund (GCF), Adaptation Fund, and other bilateral/multilateral sources.
  - » Leverage Kenya's carbon market framework (under the amended Climate Change Act, 2023) to attract private investments in mitigation and adaptation projects.
- **Track and Report Climate Expenditures:**
  - » Implement systems to monitor and report on climate-related expenditures to ensure accountability and alignment with county priorities.
- **Public-Private Partnerships (PPPs):**
  - » Engage the private sector in climate-resilient investments, such as renewable energy, water harvesting, and sustainable agriculture.
- **Restore and Protect Ecosystems:**
  - » Prioritise reforestation, wetland conservation, and sustainable land management to enhance resilience to droughts and floods.
  - » Implement the 15 Billion Trees Initiative to increase forest cover to 30% by 2032.
- **Integrate EbA into County Planning:**
  - » Mainstream EbA into County Integrated Development Plans (CIDPs) and sectoral strategies (e.g., water, agriculture, and disaster risk management).

- **Promote Community-Led EbA Practices:**
  - » Support agroforestry, rainwater harvesting, and rangeland rehabilitation to improve livelihoods while enhancing ecosystem services.
  - » Strengthen indigenous knowledge and participatory approaches in EbA projects.
- **Strengthen Early Warning Systems:**
  - » Use ecosystem monitoring (e.g., satellite data, community observations) to inform climate risk management and adaptive planning.
- **Cross-Cutting Priorities:**
  - » Gender and Youth Inclusion: Ensure women, youth, and marginalised groups benefit from climate finance and EbA initiatives.
  - » Capacity Building: Train county officials and communities on climate-smart practices and financial resource mobilization.

2.4 KENYA'S NATIONALLY DETERMINED CONTRIBUTION

Under Article 4, paragraph 2 of the **Paris Agreement,** each Party is obligated to **prepare, communicate, and maintain successive nationally determined contributions (NDCs)** outlining its climate commitments and intended achievements. Kenya's second NDC, submitted to the UNFCCC in February 2025, seeks to raise emission reduction targets by 2035 from **32% in the Updated First NDC to 35% in the new NDC**. It also enhances the domestic contribution from 13% to 19% of the total NDC cost. Both of these reflect a progression in ambition in line with the Paris Agreement.

Key recommendations on climate finance and ecosystem-based adaptation for counties from the second NDC (2031–2035) are:

Key recommendations for counties include:

- **Climate Finance:**
  - » **Domestic and International Mobilisation:** Counties should leverage both domestic resources (targeting 19% of adaptation costs) and international support (81%) to fund climate actions.
  - » **Private Sector Engagement:** Strengthen partnerships with the private sector to attract investments in climate-resilient projects, such as renewable energy and sustainable agriculture.
- **Local Funding Mechanisms:** Develop county-specific climate finance strategies, including green bonds or community-based funds, to support locally- led adaptation initiatives.
- **Loss and Damage Funding:** Establish robust systems for assessing and addressing climate-induced losses, including data collection and capacity building, to access international loss and damage funds (e.g., through the Paris Agreement's funding mechanisms).
- **Ecosystem-Based Adaptation (EbA):**
  - » **Nature-Based Solutions:** Prioritize rehabilitation of degraded lands through afforestation, agroforestry, and mangrove restoration to enhance resilience and carbon sequestration.
  - » **Blue Carbon Initiatives:** Integrate coastal and marine ecosystems (e.g., mangroves, seagrasses) into county climate plans to mitigate floods and support livelihoods (e.g., eco-tourism, seaweed farming).
  - » **Community-Led Conservation:** Empower local governance structures to manage natural resources, incorporating indigenous knowledge into ecosystem protection efforts.
  - » **Climate-Smart Agriculture:** Promote drought-resistant crops, sustainable livestock practices, and water-efficient irrigation to reduce vulnerability in food systems.
- **Implementation Support:**
  - » **Capacity Building:** Provide training for county governments on climate finance access, project design, and monitoring frameworks.
  - » **Integrated Planning:** Align County Climate Change Action Plans (CCCAPs) with national strategies (e.g., NCCAPs) to ensure coherence and attract funding.

2.5 VISION 2030 AND ITS MEDIUM-TERM PLANS

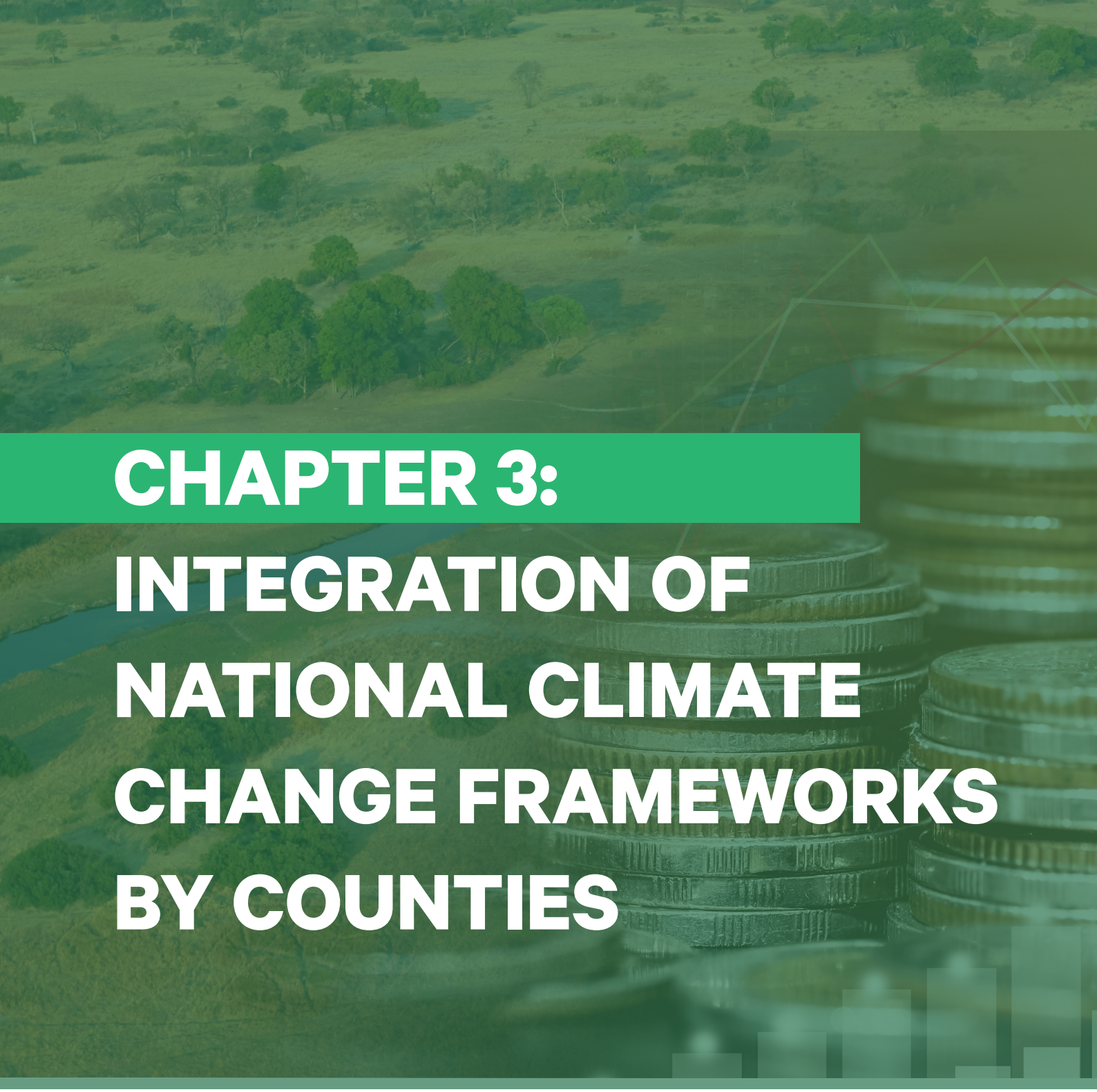
Kenya Vision 2030 is the country's long-term development blueprint, launched in 2008, and aimed at transforming Kenya into an **upper middle-income, industrialised nation** with a high quality of life by 2030. It is implemented through successive five-year **Medium-Term Plans (MTPs)**, with the current being the fourth Medium Term Plan.

Northern Kenya, especially the arid and semi-arid lands (ASALs) encompassing regions like Isiolo and Samburu, has remained a central focus of Vision 2030. This prioritisation stems from its history of marginalisation and the distinct developmental challenges that characterise the area. Some key flagship projects for/in the region include:

- **The LAPSSET Corridor Project:** the Lamu Port South Sudan Ethiopia Transport (LAPSSET) Corridor is a significant infrastructure initiative linking Kenya, Ethiopia, and South Sudan. It encompasses roads, railways, oil pipelines, and the planned Isiolo Resort City, aiming to drive economic growth, create employment opportunities, and enhance regional connectivity. However, its development also presents substantial environmental and social challenges, including community displacement, habitat fragmentation, biodiversity degradation, depletion of water resources, and increased carbon emissions. Addressing these challenges through sustainable planning will be essential for long-term viability.
- **Isiolo Resort City** is envisioned as a catalyst for tourism and economic growth in Northern Kenya, promising benefits such as job creation and urban development. However, its development and further expansion also presents environmental and social concerns, including potential land tenure disputes, heightened water demand, and increased pressure on the Ewaso Ng'iro River.
- The expansion of **Livestock and Pastoralism Support Programmes** focuses on enhancing livestock markets and improving disease control measures to support pastoralist livelihoods. However, these initiatives also present environmental and social challenges, including the risk of overgrazing. To ensure sustainability, effective rangeland management practices must be integrated, alongside strategies that balance livestock growth with broader conservation efforts.

The implementation of these major projects, among others, will substantially increase the demand for water, energy, and other natural resources. Without careful planning and a balanced approach that aligns with county-driven development priorities, this surge in resource consumption could intensify environmental and social challenges in one of Kenya's most ecologically fragile regions in which conflict over natural resources remains a perennial problem. Sustainable management and strategic coordination will be essential to mitigate these risks.

[3]Vision 2030: Kenya Vision 2030 Flagship Programmes and Projects Progress Reports | Kenya Vision 2030. Accessed on 18th June 2025.



CHAPTER 3: INTEGRATION OF NATIONAL CLIMATE CHANGE FRAMEWORKS BY COUNTIES

The analysis also incorporated relevant county legislative frameworks and strategies as key avenues for effectively mainstreaming and implementing national policies and strategies. Specifically, the focus was on county climate change laws (or bills, where applicable), County Climate Change Action Plans (CCAPs), and the County Integrated Development Plans (CIDPs).

3.1 COUNTY CLIMATE CHANGE ACTS

Kenya stands out as a leader in devolved climate change action, with nearly all counties having enacted climate change legislation and regulations to support implementation, including County Climate Change Funds (CCCFs) as dedicated pots for financing county climate actions. The CCCFs, which are operational in nearly all, if not all, counties, offer a promising model for devolved adaptation finance. These funds align with the LDC Initiative for Effective Adaptation and Resilience (LIFE-AR) delivery mechanisms, which emphasise social protection, landscape management, and community-led planning. Additionally, several counties have developed climate change policies. This section examines the following legislation: Laikipia County Climate Change Act (2021), Nyeri County Climate Change Act (2021), Meru County Climate Change Act (2020), Sawmburu County Climate Change Act (2022), and Isiolo County Climate Change Fund Act (2018).

a. Isiolo Climate Change Fund Act, 2018

The **Isiolo County Climate Change Fund Act, 2018** was enacted on **July 17, 2018,** and came into effect on **July 31, 2018.**



Objective

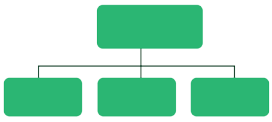
The Act establishes a Climate Change Fund to finance, facilitate, and coordinate climate change adaptation and mitigation projects within Isiolo County. It aims to enhance climate finance mechanisms, support community-led climate resilience initiatives, and integrate climate change considerations into county planning and budgeting.



Management of the Climate Change Fund

The Act outlines the sources of funding, including county allocations (not less than 2 percent of county revenues), national government contributions, international climate finance, and grants from public benefit organisations. It also establishes a Climate Finance Framework, which is updated every three years to guide fund allocation and project selection. The fund is managed through structured eligibility criteria, ensuring projects align with climate resilience goals and benefit vulnerable communities

Organizational Structure



The Act creates several governance bodies:

- **County Planning Committee** – Responsible for evaluating and approving climate projects, ensuring equitable fund distribution, and overseeing monitoring and evaluation. It also provides technical support to the ward planning committees.
- **Ward Planning Committees** – Established at the ward level to represent and engage communities, make decisions, develop project proposals, and oversee local implementation.
- **Steering Committee** – Provides oversight, mobilizes resources, and ensures compliance with financial regulations.
- **Fund Administrator** – Manages fund disbursement, maintains financial records, and coordinates project implementation.

This structured approach ensures transparency, accountability, and effective management of climate finance within Isiolo County.

b. Meru Climate Change Act of 2020

The **Meru County Climate Change Act, 2020,** seeks to create a structured framework for mobilising and supporting climate change adaptation and mitigation initiatives within the county.



Objective

The Act aims to enhance **climate resilience** by integrating climate change considerations into county planning, decision-making, and implementation. It seeks to:

- Mainstream climate change responses into development planning.
- Strengthen community-driven adaptation and mitigation initiatives.
- Mobilize financial resources for climate action.
- Promote public participation and awareness in climate governance.

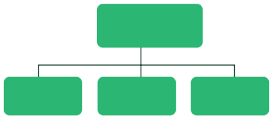


Management of the Climate Change Fund

The Act establishes the Meru County **Climate Change Fund**, which is financed through:

- County budget allocations (at least **3% of the annual development budget**).
- National and international climate finance contributions.
- Grants, donations, and other sources.

The **Fund Administrator** oversees financial management, ensuring transparency and accountability. The fund supports climate resilience projects, capacity-building initiatives, and research.



Organizational Structure

The Act creates a multi-tier governance system:

- **County Climate Change Steering Committee** – Provides oversight, policy direction, and fund administration.
- **County Climate Change Planning Committee** – Develops strategies, supports ward-level initiatives, and ensures compliance.
- **Ward Climate Change Planning Committees** – Engage communities, propose projects, and oversee local implementation.

This structure ensures **bottom-up planning,** community participation, and effective climate governance.

c. Laikipia Climate Change Act, 2021

The **Laikipia County Climate Change Act, 2021** was enacted to provide a structured framework for climate change response, adaptation, and mitigation within the county. ptation and mitigation initiatives within the county.



Objective

The Act aims to:

- Establish a **Climate Change Fund** to finance climate-related projects.
- Mainstream climate change into county development planning.
- Enhance climate finance mechanisms.
- Support community-led adaptation and mitigation initiatives.
- Facilitate public awareness and stakeholder engagement.

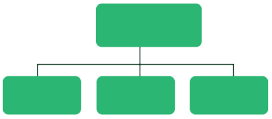


Management of the Climate Change Fund

The Act outlines the **sources of funding**, including:

- **2% of the county's annual development budget.**
- National government allocations.
- Grants from international climate finance entities.
- Contributions from public benefit organizations.

The **Fund Administrator** oversees financial management, ensuring transparency and compliance with public finance regulations. Funds are allocated based on eligibility criteria and project validation processes.



Organizational Structure

The Act establishes a **multi-tier governance system**:

- **County Climate Change Planning Committee** – Develops strategies, approves projects, and ensures equitable fund distribution.
- **Ward Planning Committees** – Engage communities, propose projects, and oversee local implementation.
- **Steering Committee** – Provides oversight, mobilizes resources, and ensures compliance with financial regulations.

d. Nyeri Climate Change Act, 2021

The **Nyeri County Climate Change Act, 2021** was enacted on **April 22, 2021**, and came into effect upon publication on **May 28, 2021.**



Objective

The Act establishes a **Climate Change Fund** to support climate adaptation and mitigation efforts within Nyeri County. It aims to:

- Integrate climate change into county planning and development.
- Mobilize financial resources for climate resilience projects.
- Strengthen community-driven climate initiatives.
- Enhance public awareness and stakeholder engagement.

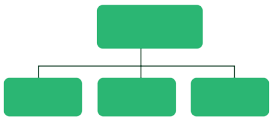


Management of the Climate Change Fund

The Act mandates that the **Nyeri County Climate Change Fund** be financed through:

- **At least 1% of the county's audited revenue account** per financial year.
- Grants and loans from the National Climate Fund.
- Contributions from international climate finance entities.
- Donations from public benefit organizations.

The Fund Administrator, appointed by the County Executive Committee Member for Finance, oversees fund management, ensuring transparency and compliance with financial regulations.



Organizational Structure

The Act establishes a multi-tier governance system:

- **County Climate Change Steering Committee** – Provides oversight, policy direction, and fund administration.
- **County Climate Change Planning Committee** – Develops strategies, supports ward-level initiatives, and ensures compliance.
- **Ward Climate Change Planning Committees** – Engage communities, propose projects, and oversee local implementation.
- **Climate Change Unit** – Serves as the technical arm, supporting coordination, research, and knowledge management.

e. Nyeri Climate Change Act, 2021

The **Samburu County Climate Change Act, 2022** was enacted on **June 10, 2022**, and came into effect upon publication on **June 15, 2022.**



Objective

The Act establishes a Climate Change Fund to finance, facilitate, and coordinate climate change adaptation and mitigation measures within Samburu County. It aims to:

- Integrate climate change into county planning and development.
- Mobilise financial resources for climate resilience projects.
- Strengthen community-driven climate initiatives.
- Enhance public awareness and stakeholder engagement.

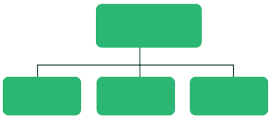


Management of the Climate Change Fund

The Act mandates that the **Samburu County Climate Change Fund** be financed through:

- **At least 2.5% of the county's annual development budget.**
- Grants and loans from the National Climate Fund.
- Contributions from international climate finance entities.
- Donations from public benefit organizations.

The **Fund Administrator**, appointed by the County Executive Committee Member for Finance, oversees fund management, ensuring transparency and compliance with financial regulations.



Organizational Structure

The Act establishes a **multi-tier governance system:**

- **County Climate Change Steering Committee** – Provides oversight, policy direction, and fund administration.
- **County Climate Change Planning Committee** – Develops strategies, supports ward-level initiatives, and ensures compliance.
- **Ward Climate Change Planning Committees** – Engage communities, propose projects, and oversee local implementation.

The analysis of the climate change Acts – along with Meru's Bill – highlights several shared elements across the five counties.

- **Institutional Framework:** The Acts create several governance bodies, including the **Climate Change Steering Committee,** the **County Climate Change Unit**, and the **County Planning Committee**, each with distinct roles in policy formulation, coordination, and implementation.
    - » **Nyeri:** The CCU is well-defined and has a structured team within the Department of Water, Irrigation, Environment, and Climate Change.
    - » **Laikipia:** Has a dedicated Directorate of Climate Change and explicitly outlines the role of Climate Change Officers and a CCU in implementation.
    - » **Samburu:** Institutional roles are embedded in the Water, Environment, Climate Change, Natural Resources & Energy Department, with dedicated personnel listed.
    - » **Isiolo:** Functions through a Directorate of Climate Change under the Department of Water, Sanitation, Energy, Environment, Mining, Natural Resources & Climate Change Resilience.
    - » **Meru:** The Climate Change Unit operates under the Department of Water, Irrigation, Environment, Natural Resources and Climate Change. It works closely with the Directorate of Climate Change, which leads the technical development and oversight of climate-related initiatives.
- **Fund Administrator** – The Acts create the office of the Fund Administrator, responsible for overseeing the fund, managing disbursements, maintaining financial records, and coordinating project implementation.
- **Ward-Level Governance:** The Acts mandate the establishment of **Ward Climate Change Planning Committees,** ensuring community-driven climate action and localized decision-making.
- **Public Participation & Transparency**: They all emphasise **stakeholder engagement,** requiring public consultations, climate education, and awareness campaigns to ensure inclusive governance.
- **Climate Finance Oversight:** The Acts establish the **County Climate Change Fund,** detailing financial mechanisms and regulatory oversight to support climate adaptation and mitigation projects.
- **Monitoring & Compliance:** They assign **climate change duties** to both public and private entities, with provisions for monitoring, reporting, and enforcement to ensure accountability.

However, there are notable differences that may not be immediately apparent. Two, in particular, stand out:

- Apart from Isiolo – one of the pioneer counties in devolved climate change legislation – the other counties have framed their Acts, all of which were enacted after 2021, **Climate Change Acts** to reflect broader climate management rather than solely the establishment of a climate change fund. Isiolo took a distinct approach by initially prioritising the establishment of **dedicated county climate change funds,** framing its legislation as the **Climate Change Fund Act** rather than a broad climate management framework. In addition to this fund-specific law, the county also enacted a **separate Climate Change Act** to oversee climate-related activities and developed a **comprehensive climate change policy** to guide implementation.
- The second key distinction is the percentage of county allocations for climate action. This ranges from **1% to 3%**, with the key distinction being the use of **"not less than"** to ensure a minimum threshold rather than a fixed limit. In Kenya, rainfed agriculture is the primary livelihood source, and climate change is often perceived – especially by the layperson – as synonymous with droughts and diminished seasonal agricultural yields. It is therefore unsurprising that Nyeri, predominantly characterised by a wet climate – except for Kieni, its drier region – has set its allocation at **1%**, the minimum 'recommended' threshold, while the other four counties – Meru, Samburu, Isiolo, and Laikipia – have exceeded the upper limit in their allocations.

3.2 COUNTY INTEGRATED DEVELOPMENT PLANS

County Integrated Development Plans (CIDPs) are established under the **County Governments Act, 2012,** specifically **Section 104,** which mandates counties to *prepare integrated development plans to guide their planning and budgeting processes*. Additionally, the **Public Finance Management Act, 2012 (PFM Act)** reinforces the requirement for counties to align their budgets with CIDPs.

In line with the **Climate Change Act, 2016,** the **National Climate Change Action Plan**, the **Long-Term Strategy (LTS)**, and the **Nationally Determined Contribution (NDC)** – all of which emphasise integrating climate change into **County Integrated Development Plans (CIDPs)** as the primary framework for development planning and implementation – this report examines the **percentage of budget allocations** dedicated to climate-related activities. **Table 1** provides a summary of the findings.

Table 1: Percent climate change related budgetary allocations across the ENNCA counties

County	Total budget (Million Kshs.)	Sector, as defined in the CIDP	Climate Change Related Allocations (Million Kshs.)	Percentage of budget allocated for climate change related activities	Key Allocations/Sectors and Activities
Isiolo	67,952.07	Water, Sanitation, Environment, Energy & Climate Change	36,178.60	53	• Climate-smart agriculture & landscape regeneration • Renewable energy micro-grids, biogas units • Water access: boreholes, pans, WRUAs, sewer upgrades • Pasture: afforestation, rangeland management • Drought management: early warning, Disaster Risk Management (DRM) policy
Laikipia	125,700.10	Water, Environment, Natural Resources and Climate Change	30,943.55	24.62	• Solar energy installations and small hydro plants • Climate-smart agriculture and green energy promotion • Construction/desilting of mega dams • Water harvesting infrastructure • Feed reserves and drought insurance for farmers
Nyeri	43,526.35	Undefined. Climate relevant activities spread in Agriculture & Rural Development and Infrastructure, Energy, Rural & Urban Development	1,534.2	3.52	• Agroforestry, organic fertilizers, irrigation • Renewable energy promotion • Sustainable pasture management • Climate-smart technologies • Water harvesting and efficient utilisation

Meru	111,750.	Environment, Water, Natural Resources & Climate Change	15,555.6	13.92	• Climate-smart agriculture • Renewable energy & decarbonisation initiatives • Flood control and drought mitigation • Water availability optimization • 15B tree campaign contribution (reforestation)
Samburu	39,961.38	Water, Environment, Natural Resources & Climate Change	8,752.40	22.01%	• Expansion of irrigated agriculture • Climate-smart tech and modern aquaculture • Pasture enhancement & rangeland rehab • Livelihood diversification • Flash flood and drought mitigation measures

Key observations from **Table 1** that merit highlighting include:

- Counties classified as **arid and semi-arid** – such as **Laikipia, Isiolo, and Samburu** – experience frequent droughts and floods and the resulting socio-economic impacts, making them more inclined to allocate **higher budgetary resources** toward climate change initiatives. This aligns with the broader observation that, in rural economies, climate change is often perceived primarily through the lens of **droughts and their consequences.**
- Isiolo's **significantly higher budget allocation (over half of its total budget)** for climate-related initiatives, compared to **Meru, Laikipia, and Samburu**, stems from its broader classification of climate as a sector encompassing **Water, Sanitation, Environment, Energy, and Climate Change**. In contrast, the other four counties define the sector more narrowly, covering only **Environment, Water, Natural Resources, and Climate Change.**
- The degree to which climate change is perceived as a threat further underscores the **varying degrees of intentionality** in how counties incorporate climate change into their **County Integrated Development Plans (CIDPs). Samburu, Meru, and Isiolo** have distinct **climate and environmental sectors,** whereas **Nyeri,** according to its CIDP, lacks a dedicated climate sector. Instead, climate considerations are primarily embedded within **Agriculture & Rural Development and Infrastructure, Energy, Rural & Urban Development** sectors. Indeed, Nyeri's 3.52% allocation for climate change activities is derived from an analysis of the climate-related initiatives embedded within these two sectors.
- There is a clear need to strengthen county capacity in **climate finance budget coding, tracking, and reporting**, alongside the development of **standardised planning templates.** Building on previous initiatives – such as the **UNDP-supported Training Handbook on Climate Finance: Budget Coding, Tracking, and Reporting** – these templates would help streamline planning and reporting. Without a unified approach, counties vary in how they plan for and report climate-related expenditures, leading to potential **overestimation or underestimation** of budget allocations.

3.3 COUNTY CLIMATE CHANGE ACTION PLANS

County Climate Change Action Plans **(CCCAPs)** are a recent development in county-level climate planning, with the **2023–2027** cycle marking the **first** of its kind. However, there appears to be a **legal gap** regarding the national legislation and policy framework within which they should be anchored. **Section 19** of the **Climate Change Act, 2016** only mandates counties to **mainstream climate change actions** within their functions and integrate them into **County Integrated Development Plans (CIDPs)**. The Act does not explicitly reference CCCAPs, instead requiring counties to align their strategies with the National Climate Change Action Plan (NCCAP) and develop **local frameworks for climate resilience.**

This may explain why **only counties with recently enacted climate change laws** – Meru and Samburu as examples that stand out – have incorporated specific provisions on CCCAPs. Further, given this legal gap, one might argue that the development of the current CCAPs was primarily driven by the availability of the **World Bank FLLoCA funding,** which required preparatory steps for counties to qualify for the full **FLLoCA funding – with the development of a county climate action plan being a mandatory requirement.** Consequently, in the absence of similar funding and requirements in the future, the continuity of CCCAPs remains uncertain.

In general, the legal standing of County Climate Change Action Plans in the five counties can be summarized as follows:

- The Meru Climate Change Act of 2020 **explicitly and extensively** mentions the County Climate Change Action Plan. **Section 31–34** provide a **dedicated sub-part** outlining **Contents of the Action Plan** (Section 32); **Approval process** (Section 33); and **Biennial review** (Section 34). This shows a strong legal mandate for developing and updating the CCCAP in the future.
- The Samburu County Climate Change Act, 2022 also **formally institutionalises** the CCCAP. Section 27–30 cover the **Development of the Plan**, and **Approval, Review, and Annual Reports**. Further, a **Steering Committee** is mandated to coordinate the **formulation and review of the CCCAP.**
- The Isiolo County Climate Change Fund Act, 2018, **does not explicitly** mention a "County Climate Change Action Plan". Instead, it refers to a **Climate Finance Framework,** which must align with the **County Planning Framework,** including the CIDP. The Act emphasizes **project-based planning** via Ward Committees but lacks a formal CCCAP clause. Isiolo's position is unsurprising, as it was among the **early adopters** of **devolved climate finance** – at a time when the concept of County Climate Change Action Plans had yet to gain traction.
- Like Isiolo, Laikipia's County Climate Change Act, 2021 **does not mention a CCCAP by name**, but requires a **Climate Finance Framework** aligned with the CIDP and national policies; and emphasises the role of The **County Planning Committee** and **Ward Committees** in grassroots project planning.
- Nyeri County Climate Change Act, 2021 **explicitly mentions the County Climate Change Action Plan (CCCAP) in Part IV** – Measures and Actions for Responding to Climate Change. Specifically:
    - » Section 25 establishes the requirement for a County Climate Change Action Plan, outlining its formulation process.
    - » Section 26 details the contents of the CCCAP, ensuring alignment with national climate strategies.
    - » Section 27 mandates the approval process for the CCCAP.
    - » Section 28 requires a biennial review of the CCCAP to assess implementation progress.

Thus, only Nyeri, Samburu and Meru Counties have Climate Change Acts that clearly and explicitly provide for the development, approval, and review of a County Climate Change Action Plan. This is again unsurprising, as these Acts – **with Meru's still at the Bill stage** – were only formulated recently, when the concept of **county-level climate change planning** had gained significant traction, and at a time the World Bank funding that supported their development was also available.

Based on their respective CCCAPs, the five counties exhibit distinct approaches to climate finance and EbA, shaped by their varying socio-economic conditions and priorities. This is summarised in Table 2 below.

Table 2: Comparison of the EbA Approaches across the five ENNCA Counties

County	Distinct Elements		CCCAPs (2023-2027) budget (in Millions of Kshs)	2023-27 CIDP Climate-related budget (in Millions Kshs)	Notes
	Climate finance	Ecosystem-based adaptation			
Isiolo	Early leader in climate finance with Climate Fund Act (2018), but has since struggled with budget allocations post the initial donor interest and support. Strong focus on MRV systems to access GCF and other funds	Aridity, pastoralist livelihoods; Rangeland management, landscape reseeding, anti-desertification, integrated pastoralist practice and water resource management	751	36,178.60	As defined in the implementation plan. However, the same seems to be incomplete, as it only does make reference to one ward – Cherab. Further, this figure is specified as short-term budget allocation.
Nyeri	Strong regulatory foundation with 2021 Climate Change Act and well-structured fund governance including private sector and civil society roles	High agricultural potential but water scarcity; focus on watershed protection, afforestation, landslide management, eco-tourism and riparian rehabilitation	23,904.8	1,534.2	• As defined in the implementation plan. • Budget is quite at variance with the CIDP's figures.
Laikipia	Emphasis on linking climate finance to SDGs and Vision 2030; strong alignment with economic growth and low-carbon transition	Human-wildlife conflict, private conservancies; Soil and water conservation, forest restoration, agroforestry, clean energy (biomass) linkages	1,971,050	30,943.55	• As defined per the implementation plan and sectorally • Budget is quite at variance with the CIDP's figures. For context, it is about 16,000 times the total CIDP budget.

Samburu	Emerging system (Climate Change Act 2022), with focus on local Ward Committees (WCCPCs); less detailed financing mechanisms but emphasis on community-based planning	Severe droughts, marginalized communities; EbA linked with indigenous knowledge, participatory mapping of ecosystem	1293.5	8,752.40	• Defined per the implementation plan and sectorally
Meru	The Bill has not yet been enacted into law and currently lacks provisions specifying percentage allocations for climate action within the budget.	Conflict over water resources arising from competing demands between agricultural and livestock uses. Prioritised EbA actions include watershed management, agroforestry, and conservation agriculture	911	15,555.6	• Defined per the implementation plan and sectorally

Key highlight from Table 2 is the differences in budget allocation for climate change between the CCCAPs and CIDP are likely influenced by the anticipated funding from the FLLoCA. As previously noted, the creation of the CCCAPs was primarily motivated by the FLLoCA program and did not align with any current frameworks like the CIDP. This highlights the necessity of considering existing frameworks and strategies before introducing a new concept.

3.4 CONTRIBUTION OF THE FIVE ENNCA COUNTIES TO THE IMPLEMENTATION OF THE NATIONALLY DETERMINED CONTRIBUTION

Counties are central to Kenya's success in meeting its Nationally Determined Contribution (NDC) targets. Given the devolved governance structure, here are some key roles counties are playing as far as implementation of the NDC is concerned:

1. **Mainstreaming climate action into county planning:** Counties are integrating climate change mitigation and adaptation priorities into County Integrated Development Plans (CIDPs), Annual Development Plans, and sectoral strategies, ensuring alignment with the National Climate Change Action Plan and the NDC targets.
2. **Implementing locally-led climate solutions:** Counties are well-positioned to roll out Ecosystem-based Adaptation (EbA), climate-smart agriculture, sustainable land use, and renewable energy initiatives tailored to local contexts. These directly contribute to Kenya's mitigation and adaptation goals.
3. **Mobilizing and managing climate finance:** Counties are acting as mobilizing and implementing entities for climate finance, including accessing funds through mechanisms like FLLoCA, green bonds, or climate resilience funds. Strengthening public finance management systems at the county level is key to this role. Indeed the 1.5% allocation of development budget to climate change activities provides predictable finance that can sustain some of the activities that need to be implemented on a continuous basis over time.
4. **Generating and using local data:** Counties collect, analyse, and apply localized climate data to inform planning, monitor progress, and support evidence-based decision-making, addressing a major gap in Kenya's climate governance landscape. Preparation of the County Climate Change Action Plans (CCAPs) was preceded by a detailed consultation and assessment using the Participatory Climate Risk Assessment methodology. Both primary and secondary data was collected and used in preparing the plans.
5. **Engaging communities and stakeholders:** Using the existing governance structures such as county and ward climate change planning committees, counties have fostered inclusive participation by involving youth, women, indigenous groups, and the private sector in climate action. This enhances ownership and ensures that interventions are equitable and context sensitive.
6. **Strengthening institutional capacity:** By building the capacity of CCUs and other relevant departments, counties are strengthening coordination, reporting, and accountability in climate action. CCUs have been useful in providing

Based on the stakeholder analysis report for the Water-Energy-Food (WEF) Nexus Project, there are several key insights into how the five counties – Laikipia, Nyeri, Meru, Isiolo, and Samburu – are specifically contributing to the implementation of Kenya's NDC goals. While the document does not directly reference the NDC framework, the stakeholder roles, project design, and outcomes align strongly with its key climate priorities. Here's a synthesis framed around core NDC implementation themes:

1. Mainstreaming Climate Resilience into County-Level Planning

All five counties are integrating climate resilience measures into their mandates, particularly in agriculture, water, and energy sectors. County departments – especially those handling crops, irrigation, livestock, energy, water, and natural resources – are undertaking:

- Infrastructure development (e.g. irrigation schemes, renewable energy technologies),
- Ecosystem restoration (e.g. through KFS, CFA, and conservancies),
- Capacity building for farmers and extension officers.

This supports NDC goals around increasing community resilience, especially in arid and semi-arid lands.

2. Alignment with Ecosystem-based Adaptation (EbA) Approaches

The report emphasises stakeholder familiarity and integration of EbA and nexus approaches. This is evident in:

- Community forest and water resource management (e.g. WRUAs, CFAs),
- Watershed restoration and rangeland rehabilitation by NRT and conservancies,
- Cross-sector collaboration that embeds ecosystem functionality in development.

These approaches match Kenya's NDC priority to promote ecosystem-based practices for adaptation and mitigation.

3. Decentralised Climate Finance and Stakeholder Mapping

Through partnerships with organisations like the National Treasury (FLLoCA), Water Services Trust Fund (WSTF), and international NGOs (e.g. USAID-Nawiri, SNV, World Vision), the counties are tapping into climate-related financing and institutional support. The report also references:

- County-level coordination and stakeholder mapping,
- Participatory approaches involving marginalized and vulnerable groups,
- Community-driven planning (e.g. "stake owners" like pastoralists and WRUAs).

This supports the NDC's call for locally-led action and inclusive planning.

4. Green Economy and Low-Carbon Development

Energy-focused interventions – including promotion of energy-saving devices, green energy deployment, and infrastructure development – indicate progress on low-carbon development pathways, a foundational pillar of Kenya's NDC mitigation efforts.

5. Cross-Sector Coordination and Knowledge Sharing

Institutions like CETRAD, KALRO, KEFRI, and universities are central to the knowledge co-production process, modelling nexus scenarios using the WEF toolkit. This reflects the NDC commitment to enhanced institutional coordination and evidence-based planning.

NDC Theme	Evidence from the WEF Report
Adaptation (resilience, EbA)	Ecosystem restoration, climate-smart agriculture, WRUA, CFAs and conservancies engagement
Mitigation/low-carbon development	Green energy development and energy efficiency promotion
Finance and resource mobilisation	World Bank (FLLoCA) and other donor-supported programmes (WSTF, USAID, SNV) and PPP implementation (Green Bond)
Capacity building and coordination	Involvement of universities and other research institutions in EbA projects
Inclusive, locally-led action	Community gatekeepers identified, focus on CBOs, WRUAs, local climate champion groups and pastoralist groups.

3.5 KEY INSIGHTS ON CLIMATE FINANCE AND EBA FROM THE COUNTY DEVELOPMENT PLANS AND LEGISLATION

Although, at a glance, all the five counties may seem aligned with national climate policies and priority actions, significant challenges and policy gaps persist, as evidenced by this analysis and the Technical Assessment (TA) for the Financing Locally Led Climate Action Program (FLLoCA). In general while counties such as Laikipia and Makueni have demonstrated leadership in mainstreaming climate change into CIDPs and establishing CCCFs, many others still treat climate change as a standalone issue. A 2025 analysis by *Business Daily* notes that climate-related actions are often vaguely articulated, with limited budgeting or follow-through.[5] Specific issues and gaps identified from the analysis of climate finance policy implementation in the five ENNCA counties include:

- **Policy and Institutional Readiness:** While most counties have established CCUs to integrate climate change into county policies, plans, and programs – ensuring alignment with national and international frameworks – and nearly all have developed County Climate Action Plans, implementation remains inconsistent due to gaps in institutional capacity and funding constraints. Key challenges include limited technical expertise, weaknesses in monitoring and enforcement, and inter-agency coordination difficulties, often stemming from role overlaps and a lack of clarity among departments and committees. A further study is necessary to evaluate the current state and capacity gaps within the Climate Change Units across all the five counties, with a view to bridging the gaps.
- **Budgetary Allocations:** All the five counties have incorporated legislative provisions mandating the allocation of **1–3%** of their development budgets for climate action, with allocations ranging from 1% in Nyeri to 3% in Meru. A key challenge, as evidenced by Isiolo, lies in actual budget allocation. Isiolo's last 2% annual development budget allocation for climate change resilience occurred in the 2019/2020 and **2020/2021 financial years,** as documented in its County Climate Change Action Plan. These allocations appeared largely donor-driven, and when supporting donors redirected funding elsewhere, the county subsequently ceased its own budgetary provisions for climate change initiatives.
- **Climate Finance Tracking:** Counties face challenges in tracking climate-related allocations and expenditures due to limited technical capacity, the absence of standardized templates for consistency and comparative analysis, and a lack of integration with the Integrated Financial Management Information System (IFMIS). The stark disparities in climate change-related budgets between County Climate Change Action Plans (CCCAPs) and County Integrated Development Plans (CIDPs) highlight inconsistencies in prioritization and resource allocation. For example, Laikipia's Climate Change Action Plan outlines a budget 16,000 times larger than what is allocated in its CIDP, highlighting the distinct approaches used in climate change budgeting and implementation across the two processes. Currently, the template that the counties are using is the FLLoCA project-based. This calls for the need to have a template that is applicable to all climate related projects.
- **Clarifying Climate Budget Allocations:** Further, the discrepancies between climate change budgets in County Climate Change Action and County Integrated Development Plans make it **challenging to determine whether counties meet the minimum required allocation for climate action.** In addition to addressing these concerns, there is also a need to clarify how the **percentage allocation for the Climate Change Fund**, as mandated by county climate change legislation, fits within the broader climate change budgets reported in CIDPs and CCCAPs, as well as the **distinct roles and functions of each budget.**

[4]The World Bank carried out a Technical Assessment (TA) to analyse the strengths and weaknesses of the GoK to deliver locally-led climate resilience action results under the Financing Locally-Led Climate Action Programme (G-FLLoCA programme).

[5]How far have county development plans come in climate change fight? - Business Daily

- **Public Participation and Inclusivity:** Mechanisms for community engagement in climate finance decisions are weak, particularly in ensuring the inclusion of marginalised groups. Indeed, a stakeholder mapping and analysis undertaken as part of the current project indicates that nearly half of the most influential actors in climate change sector comprise **county and national government departments and ministries**, as well as **international non-governmental organizations.** These entities serve as **funders, key policy makers, project implementers, and development partners** within community initiatives. Conversely, **local communities** and **interest group decision-makers** are recognised as stakeholders and primary beneficiaries, serving as gatekeepers to resources. They facilitate access and shape community engagement but do not directly influence projects through financial contributions.
- **Capacity Gaps in Proposal Writing:** Like other counties, there are **significant limitations in the (five) counties' internal capacity to independently prepare climate funding proposals,** despite ongoing institutional and policy efforts. Proposal writing for climate finance has largely been enabled by technical and financial support from development partners, notably through the FLLoCA programme, World Bank, USAID (e.g. Nawiri in Isiolo), and NGOs (e.g., PACJA in Meru). For instance, external consultants and national-level Project Implementation Units (PIUs) were instrumental in facilitating CCCAP processes, and this support often included drafting or guiding funding proposals. Counties thus **require technical assistance to strengthen their ability to access and manage climate finance, including training on proposal development and financial reporting.** Moreover, the county technical team should be trained and get familiar with donor requirements during proposal development.
- **Insufficient data and evidence:** lack of data emerged as key concern from the policy dialogues convened under this project. Insufficient abilities in producing data and evidence undermine the technical rationale needed to secure financial approvals. Consequently, counties should dedicate resources to data generation to gather sufficient evidence that supports their justification when applying for funds.



CHAPTER 4: GAPS AND OPPORTUNITIES

Despite Kenya's progress in accessing climate finance, several gaps persist. These include limited scarce resources relative to needs, private sector engagement, weak costing of adaptation priorities, and inadequate tracking of adaptation finance flows.

In this chapter, we examine a range of strategic opportunities to address the persistent gaps in climate finance, particularly as they manifest at the county level. Despite the establishment of enabling frameworks such as the Climate Change Act (2016) and the Public Finance Management Act (2012), counties continue to face significant challenges in mobilising, accessing, and effectively deploying climate finance. These include limited fiscal autonomy, inadequate technical capacity to develop bankable adaptation projects, and the absence of robust mechanisms for tracking and reporting climate-related expenditures. Moreover, while County Climate Change Funds (CCCFs) have emerged as a promising model for devolved climate finance, their operationalisation remains uneven across counties, often constrained by inconsistent policy support, fragmented institutional arrangements, and insufficient integration with broader development planning processes. Further, only a handful of adaptation interventions in Kenya's NAP are accompanied by cost estimates, and there is no unified costing methodology in use. Tools such as Fiji's NAP Costing Tool or Papua New Guinea's stepwise approach could inform Kenya's efforts to develop a participatory, sector-specific costing framework. Additionally, the lack of a climate budget tagging system impedes transparency and accountability. Countries such as Moldova and Thailand have demonstrated the utility of tagging adaptation expenditures within national budgets to facilitate tracking and reporting.

This chapter explores policy and institutional innovations that could help bridge these gaps—ranging from enhanced intergovernmental coordination and capacity-building initiatives to the adoption of science-based evidence in policy making, and tailored financial instruments that reflect county-specific vulnerabilities and priorities.

4.1 RESOURCE MOBILISATION

According to the County Climate Change Action Plans, substantial financial resources are required to implement Ecosystem-based Adaptation (EbA) initiatives across the five ENNCA counties. Current estimates suggest the funding needs run into **hundreds of billions of shillings.** However, there remains a need for further rationalisation and prioritisation of proposed activities. Even with the most accurate figures available, the gap between identified needs and actual resource mobilisation is unmistakable. For instance, a 2021 Climate Policy Initiative's report indicates that Kenya requires approximately KES 6775 billion (USD 65 billion) between 2020 and 2030 to meet its climate goals. Yet, in 2018, only KES 243.3 billion (USD 2.4 billion) was invested in climate-related activities – just one-third of the annual requirement. Counties are therefore encouraged to adopt innovative approaches to fundraising for Ecosystem-based Adaptation (EbA), including exploring non-traditional sources of adaptation finance such as private sector investment.

Kenya could also explore innovative financial instruments such as debt-for-nature swaps, green and blue bonds, and blended finance facilities. These instruments have been piloted in countries such as Zambia, Bangladesh, and Costa Rica to mobilise private capital for ecosystem-based adaptation. In this regard, we have explored the potential of green bonds as a mechanism to support EbA implementation in the five counties. Although green bonds appear to be an easily accessible opportunity, a pilot program for green bond investments in ten counties, including Laikipia, has faced challenges due to the absence of certain necessities such as a feasibility study. Among the four projects proposed by Laikipia County, only one is actively collaborating with PWC to formulate a proposal for a water project that involves recycling wastewater and sewage, as it possesses a feasibility report. All the counties had potential projects for investment but failed to submit the necessary feasibility reports to the investors, resulting in most counties encountering setbacks. Consequently, the counties' plans should prioritize allocating some budget funds for conducting of feasibility studies in readiness for investments

While county green bonds represent a promising entry point and are the focus of our discussion, it is important to recognise that a broader suite of private sector–led financial instruments remains available for Kenya to pursue. These include tax rebates, concessional loans, blended finance mechanisms, credit risk guarantees, sustainability-linked loans, and climate-focused equity investments, among others. Bangladesh and South Africa have successfully used such tools to attract private capital into climate-resilient infrastructure and agriculture.

This aligns with Kenya's stated policy on private sector involvement in adaptation finance, which explicitly recognises the critical role of the private sector in mobilising resources for adaptation and mitigation; however, the practical implementation of this commitment has, to date, remained limited. A 2023 African Development Bank report highlights barriers such as limited risk-sharing mechanisms, weak project pipelines, and insufficient regulatory incentives as the key impediments to private sector's climate finance mobilisation.[9] A more deliberate and structured approach is therefore required to incentivise private sector participation, de-risk investments, and align commercial interests with national climate priorities. Such a move would significantly contribute to the implementation of the Seville Outcome Document, endorsed at the Fourth International Conference on Financing for Development in 2025, which calls for urgent action on climate-linked debt, including debt-for-nature swaps, disaster-related debt pauses, and green levies to mobilise adaptation finance. [10]

[6]Hernández, M., Ledwell, C., & Yang, G. J. (2025). Finance for national adaptation plan processes. What can we learn from countries' national adaptation plans? (National Adaptation Plan Global Network). International Institute for Sustainable Development. https://napglobalnetwork.org/

[7]Ditto

[8]The-Landscape-of-Climate-Finance-in-Kenya.pdf

Green Bonds, as defined by the International Finance Corporation (IFC), are financial instruments that raise funds exclusively for projects with environmental benefits, particularly those addressing climate change mitigation and adaptation. These bonds help finance initiatives such as renewable energy, clean transportation, energy efficiency, and sustainable infrastructure, supporting the transition to a low-carbon economy.

Sub-National Green Bonds – or **County Green Bonds** in the case of Kenya – as outlined in the **Kenyan Green Bonds Guidelines,** refer to **green bonds issued by county governments or other sub-national entities** to finance **local climate and environmental projects.** These bonds enable counties to mobilise resources for sustainable development, including climate resilience, water conservation, waste management, and renewable energy. The guidelines emphasise transparency, accountability, and alignment with international green bond principles to ensure credibility and investor confidence.

Between mid-2023 and mid-2024, **Financial Sector Deepening Kenya (FSD Kenya),** in collaboration with several partners – including the **National Treasury and Economic Planning** (via the **Climate Finance and Green Economy Unit**), the **Capital Markets Authority (CMA)**, the **Nairobi Securities Exchange (NSE)**, the **Adaptation Consortium,** and **Agusto&Co** –spearheaded an initiative to evaluate counties' capacity to access and leverage the green finance market for sustainable development. The project focused on economic and fiscal assessment, credit risk analysis, green asset and activity evaluation, and green finance capability assessment. Among the beneficiary counties was **Laikipia**, one of the five counties included in the current study.

Below are the key high-level summaries extracted from the assessment report:

- Counties possess numerous **green investment opportunities** across key sectors – including **water and sanitation, energy efficiency, waste management, agriculture, and urban development** – which can serve as viable avenues for attracting **green bond financing**. For Laikipia, the identified green assets include **Ewaso Nyiro River, Mukogodo Dry Forest**, and **potential sites for solar and wind energy infrastructure.** The county has outlined proposed green projects, such as **developing mega dams, expanding sewerage treatment plants, and promoting renewable energy adoption.**
- Counties looking to enter the **green bond market** must enhance their capacity and framework through the following strategies:
    - » **Strengthening Financial Management**: fully **automate revenue collection** to improve financial sustainability and reduce leakages, as well as reduce **wage bill dependency** by optimising staffing structures.
    - » **Building Green Finance Capabilities:** Provide **training on green bond structuring, project verification standards,** and **investor engagement;** and establish a **County Climate Finance Unit to oversee green financial instruments.**
    - » **Aligning with National and Global Standards:** Work closely with the **National Treasury, Capital Markets Authority, and Nairobi Securities Exchange** to ensure compliance; and seek certification under **Climate Bonds Standards** for credibility.
    - » **Enhancing Stakeholder Engagement & Partnerships:** Foster partnerships with **development partners, private investors, and multilateral institutions** for technical and financial support; and **leverage existing county climate funds** as a basis for green bond issuance.

[9]kenya_cfr_2023.pdf

[10]UN development summit backs innovative tools for climate finance

[11]Green Bonds | International Finance Corporation (IFC). Accessed on 14th June 2025

Carbon trading, as an additional source of finance, deserves increased attention. Beyond generating income through carbon credits, it provides a range of additional benefits to both people and ecosystems. These include promoting ecosystem conservation and restoration, supporting community livelihoods through benefit-sharing arrangements, and funding Ecosystem-based Adaptation (EbA) interventions such as reforestation, agroforestry, rangeland rehabilitation, and wetland conservation. Although promising, carbon trading is still a relatively new area that demands significant capacity-building efforts.

The Climate Change Act of 2016 was amended to incorporate provisions for carbon trading, which led to the development of carbon market regulations. In line with this, the government, through the support of WWF Kenya is currently developing a community guide on carbon trading to enhance local awareness and participation. However, there has been limited progress in strengthening the legal and policy frameworks at the county level, particularly in updating County Climate Change Acts to integrate carbon trading. Several counties have expressed interest and requested for support in reviewing and updating of their legislative frameworks to align with emerging opportunities in the carbon market.

[11]gbpk-background-document-2.pdf. Accessed on 14th June 2025.

[12]Policy-Guidance-Note-for-Green-Bonds.pdf. Accessed on 14th June 2025.

[13]Green-finance-assessment-of-Laikipia-County.pdf. Accessed on 14th June 2025.

4.2 THE CLIMATE CHANGE ACT OF 2016 WAS AMENDED TO INCORPORATE PROVISIONS FOR CARBON TRADING, WHICH LED TO THE DEVELOPMENT OF CARBON MARKET REGULATIONS.

In line with this, the government, through the support of WWF Kenya is currently developing a community guide on carbon trading to enhance local awareness and participation. However, there has been limited progress in strengthening the legal and policy frameworks at the county level, particularly in updating County Climate Change Acts to integrate carbon trading. Several counties have expressed interest and requested for support in reviewing and updating of their legislative frameworks to align with emerging opportunities in the carbon market. Science based evidence in policy making

The relationship between science, policy, and practice remains complex and often challenging to navigate. This section of the report is our attempt at examining and summarising the implications of several proposed policy interventions in the ENNCA region, specifically assessing their alignment – or lack thereof – with scientific evidence. The scientific insights underpinning this analysis were drawn from other components of the broader ENNEbA project.

For instance, scientific modelling conducted under the ENNEbA initiative indicates a projected temperature increase of 1.1°C to 1.2°C (SSP1–2.6), accompanied by higher rainfall across the region. However, the associated rise in evapotranspiration could offset these rainfall gains, ultimately constraining water availability. Simultaneously, actual discharge is projected to decline due to increasing water withdrawals – particularly in agriculture – even without the implementation of proposed large-scale irrigation projects. If national irrigation expansion plans in the region proceed as currently outlined, water demand is expected to surpass supply by 2030. These findings underscore the need for thoughtful implementation of irrigation initiatives that rely on the type of data generated from this project, as well as robust coordination with local actors and stakeholders.

There is also a need to critically examine policy contradictions that emerge in implementation. For instance, in the energy sector, households are encouraged to transition to 'cleaner' energy sources such as liquified petroleum gas (LPG) and electricity; however, widespread poverty and affordability constraints have led to continued dependence on biomass fuels. Similarly, while irrigation is promoted as a strategy for climate-resilient agriculture, this push unfolds against a backdrop of water scarcity and intensifies energy demands – thereby compounding sustainability challenges across sectors.

Scientific evidence such as the type generated from this project can equally play a pivotal role in influencing policymakers – particularly governors, whose development agendas are often shaped by electoral timelines – by underscoring the importance of long-term planning. One of the key barriers to investing in EbA, as identified by the project, is the extended return on investment period. Yet, EbA interventions such as agroforestry, afforestation, and reforestation – despite their longer payback horizons – offer a range of environmental and socio-economic benefits, including biodiversity conservation, improved water quality and storage, enhanced water security, soil conservation, better soil health, and microclimate regulation.

This is why, as a logical next step, the project's findings and recommendations should be shared with key policy actors – including the relevant Council of Governors (CoG) committee, governors of participating counties, regional economic blocs, and other strategic stakeholders – to guide coordinated planning for implementation. Convening such a forum would enable stakeholders to prioritise interventions using criteria such as return on investment timelines, among other relevant indicators.

Thus, the rich data generated from this study should not only serve as a critical resource for both county- and national government-led development efforts but also offer a valuable opportunity for counties as they revise key policy documents and prepare plans for the upcoming Medium-Term Plan (MTP) cycle. With the second phase of FLLoCA also scheduled to commence in 2027, this evidence base can help address a persistent gap at the county level – namely, the lack of reliable data. Additionally, if effectively presented, the modelling results and scenario analyses can empower county executives to engage members of the county assembly and build support for evidence-informed decision-making.

4.3 COORDINATION IN PROJECT IMPLEMENTATION AND OPPORTUNITIES FOR POLICY COHERENCE AND INNOVATION

A key concern emerging from the policy dialogues convened under this project is the absence of deliberate and coordinated engagement in project implementation, particularly for initiatives led by the national government. As outlined in the science-policy interface section of this report, such disjointed approaches risk producing interventions that are neither grounded in scientific evidence nor aligned with local needs and priorities, significantly increasing the risk of maladaptation. Projects such as the Isiolo City Resort, which imply significant water withdrawal and consumption, pose a risk to regional water availability and security if developed without close coordination and engagement with local stakeholders and other key actors.

Beyond counties, local and international organisations, and community-based organisations, several key fora and actors have been identified as critical to Ecosystem-based Adaptation (EbA). These include academic and research institutions, the Climate Smart Agriculture Multi-Stakeholder Platform, the Climate Business Information Network representing the private sector, and the Maarifa Centre housed within the Council of Governors (CoG).

However, the gaps in coordination and harmonisation are not limited to how adaptation activities are coordinated and implemented at the county level; they are also evident across various policy instruments that aim to address the same challenge. For instance, there is a disconnect between the National Adaptation Plan (NAP) and the National Biodiversity Strategy and Action Plan (NBSAP), reflecting a broader global trend. Institutional mechanisms to harmonise these frameworks – such as joint planning committees or shared indicators – could enhance efficiency and impact.

CHAPTER 5: SUMMARY, CONCLUSIONS, AND RECOMMENDATIONS

5.1 SUMMARY OF THE REPORT

The report, *Addressing Climate Finance Policy Gaps in the Ewaso Ng'iro North Catchment Area (ENNCA): Strengthening Frameworks for Ecosystem-Based Adaptation and Sustainable Development,* examines the climate finance landscape across five counties – Laikipia, Isiolo, Samburu, Meru, and Nyeri – within ENNCA. Funded by **BMUV** and led by **SEI**, the initiative focuses on **ecosystem-based adaptation (EbA)** to enhance climate resilience while promoting sustainable development.

Key Findings

Integration of National Climate Frameworks:

- The five counties within the Ewaso Ng'iro North Catchment Area (ENNCA) – Laikipia, Isiolo, Samburu, Meru, and Nyeri – have partially integrated key national climate frameworks, including the National Climate Change Action Plan III (NCCAP III), Nationally Determined Contribution II (NDC II), Long-Term Strategy (LTS), and National Adaptation Plan (NAP 2015–2030).
- While adaptation measures are prioritised, implementation remains inconsistent due to institutional capacity gaps and financial constraints.

County-Level Climate Finance Readiness:

- Each county has enacted climate-related legislation, with Isiolo pioneering the County Climate Change Fund (CCCF) Act in 2018.
- Budget allocations for climate action range from 1% (Nyeri) to 3% (Meru), but actual disbursement is inconsistent and often reliant on donor funding.
- Climate finance tracking is weak due to limited technical capacity, the absence of standardised reporting templates, and lack of integration with the Integrated Financial Management Information System (IFMIS).

Climate Change Action Plans (CCCAPs):

- CCCAPs are a relatively new planning tool, developed largely due to World Bank FLLoCA programme funding requirements.
- Legal backing for CCCAPs remains uncertain, with Meru, Nyeri, and Samburu incorporating clear provisions in their climate laws, while Isiolo and Laikipia do not.

Green Finance and County Green Bonds:

- Counties possess green investment opportunities across water, sanitation, energy efficiency, waste management, agriculture, and urban development.
- Laikipia has undertaken a Green Finance Assessment, revealing that shadow credit ratings and governance limitations affect green bond feasibility.
- Strengthening financial management, technical expertise, and public-private partnerships is crucial to unlocking county-level green bonds.

Science-Based Evidence in Policy Making:

- Scientific modelling indicates rising temperatures and rainfall in ENNCA, but increased evapotranspiration and water withdrawals could constrain water availability.
- Policy contradictions, such as promoting irrigation amidst water scarcity, highlight the need for evidence-based planning and coordination.

Coordination Challenges:

- Nationally driven projects, such as the Isiolo City Resort, often lack deliberate and coordinated engagement with local stakeholders, increasing the risk of maladaptation.
- Stakeholder diversity is evident, with key actors including academic institutions, private sector platforms, and community-based organisations, but collaboration mechanisms remain uneven.
- Limited inter-county coordination means that cross-border issues such as resource use and conflicts are not adequately and sustainably dealt with.

5.2 GENERAL CONCLUSIONS

Policy Alignment:

- Counties have made progress in integrating national climate frameworks, but implementation remains inconsistent due to technical capacity gaps and financial constraints.

Budgeting and Finance Challenges:

- While counties have legislated climate allocations, actual budget utilisation is hampered by reliance on donor funding and unclear financial tracking mechanisms.

Climate Action Planning:

- CCCAPs hold promise as a planning tool but face legal uncertainties, raising concerns about continuity beyond donor-driven incentives.

Green Finance Potential:

- Counties possess untapped green finance opportunities but require significant capacity-building to structure viable green bond proposals.

Science-Policy Disconnect:

- Scientific evidence is available but often underutilised in decision-making, leading to policy contradictions and sustainability challenges.

Coordination in Implementation:

- Poor coordination between national and county governments risks maladaptation and undermines the effectiveness of climate interventions.

  As environmental challenges do not necessary follow administrative boundaries, lack of coordination among contiguous counties risk creating conflicts and impeding achievement of optimum benefits.

5.3 KEY RECOMMENDATIONS FOR IMPLEMENTATION

Strengthen Institutional Capacity:

- Train county officials on climate finance tracking, proposal writing, and IFMIS integration.
- Establish or strengthen County Climate Change Units to oversee financial planning and budget execution.

Enhance Budget Tracking and Transparency:

- Develop standardised budget tracking templates for coherent financial reporting.
- Improve integration with IFMIS to ensure climate-related expenditures are properly recorded.

Legal and Policy Reforms:

- Institutionalise CCCAPs within county climate legislation to ensure long-term sustainability beyond donor funding.
- Align county climate action plans with national and international financing mechanisms to improve fund accessibility.

Expand Climate Finance Mechanisms:

- Strengthen County Climate Change Funds by ensuring budget allocations are consistently implemented.
- Build partnerships with private investors, development banks, and multilateral institutions to diversify financing streams.

Develop County Green Bond Frameworks:

- Train county stakeholders in green bond structuring, investor engagement, and compliance with global standards.
- Pilot green bond issuance in counties with strong fiscal management and viable green assets, ensuring accountability and investor confidence.

Promote Science-Based Planning:

- Institutionalise science-policy platforms to ensure evidence informs development planning and investment decisions.
- Use scientific modelling to guide long-term planning and prioritise interventions with high resilience co-benefits.

Improve Coordination Mechanisms:

- Develop structured frameworks for joint planning between national and county governments, ensuring early involvement of local stakeholders.
- Strengthen collaboration with academic institutions, private sector platforms, and community-based organisations to enhance implementation

Enhance continuous data generation:

- Counties should strengthen collaboration with research institutions and academia to generate credible data that can support the justification of funding needs to development partners. Such evidence is also essential for informing and facilitating the approval of relevant legislative frameworks by county assemblies.

REFERENCES

Government of Kenya (GoK). (2016). Kenya National Adaptation Plan: 2015-2030. Nairobi: Ministry of Environment and Forestry. https://www4.unfccc.int/sites/NAPC/Documents%20NAP/Kenya_NAP_Final.pdf

GoK. (2020). Updated Nationally Determined Contribution. Nairobi: Ministry of Environment and Forestry. https://unfccc.int/sites/default/files/NDC/2022-06/Kenya%27s%20First%20%20NDC%20%28updated%20version%29.pdf

GoK. (2023, in publication). The National Long-Term Low Emission Development Strategy. Ministry of Environment and Forestry.

MoEF/CCD. (2022). Review of the Implementation of Kenya's National Plan 2015-2030 in the Agriculture Sector. NAP Global Network/IISD. https://napglobalnetwork.org/resource/review-implementation-kenya-adaptation-plan-agriculture-2015-2030/

Terton, A., Qi, J., & Jang, N. (2024). Tracking progress on the integration of nature-based solutions and ecosystem-based adaptation in National Adaptation Plan processes. NAP Global Network synthesis report. International Institute for Sustainable Development. www.napglobalnetwork.org

Hernández, M., Ledwell, C., & Yang, G. J. (2025). Finance for national adaptation plan processes. What can we learn from countries' national adaptation plans? (National Adaptation Plan Global Network). International Institute for Sustainable Development. https://napglobalnetwork.org/

Anika Terton and Julie Greenwalt. (2021). Building Resilience with Nature: Maximizing ecosystem-based adaptation through National Adaptation Plan processes. Guidance Note. International Institute for Sustainable Development. www.napglobalnetwork.org