

COMMENTS ON THE DRAFT NATIONAL ENERGY POLICY 2025

Date: 25/6/2026

From: Natural Justice

Submitted by: Natural Justice

Part A: General Comments

Kenya has in recent years published different plans, strategies and roadmaps to facilitate progressive energy development that prioritizes renewable energy. Some of these include, the Kenya Energy Investment and Transition Plan, 2023 – 2050, the Green Hydrogen Strategy and Roadmap for Kenya (September 2023) and Draft National Green Fiscal Incentives Policy Framework (December 2022).

Recommendation: As the overarching energy policy document, the draft National Energy Policy (**NEP**) should confirm whether any of these documents in draft need to be finalised and provide timelines for their conclusion. The policy should also clarify the policy status of these documents and whether any of them (particularly the energy investment and transition plan) represent government policy positions. This will provide certainty. A statement on how these various documents complement and feed into the draft national energy policy will also foster policy coherence.

It will also be critical for the NEP to incorporate other key sector legislative requirements/plans/ policies including the following:

1. Entitlement of royalties to local communities in geothermal resource areas is not included in NEP:
The entitlement of local communities to a share of royalties from exploitation of geothermal resources to the equivalent of 5% of the royalties paid into the Treasury of the National Government payable through a trust fund managed by a board of trustees established by the local community in accordance with regulations to be published under section 85 of the Energy Act, 2019. These regulations are yet to be published. It is critical that the full implementation of this requirement is included in the NEP in line with the 'just and equitable energy transition' and 'support to vulnerable communities' proclamations in the NEP (page x of the NEP).
2. Best resettlement practices in land-based projects are not included in NEP despite being in the KOSAP Resettlement Policy Framework (RPF):
The NEP should be updated to include the best resettlement practices in land-based projects aligning with the Updated Resettlement Policy Framework (RPF) dated September 2024 for the Kenya Off-Grid Solar Access Project (KOSAP) funded by the World Bank. The RPF was developed to guide the process/procedure of land acquisition in project affected areas (but only with respect to KOSAP). Additionally, the RPF provides that the relevant state agencies agree to '*apply the principles, procedures, and standards incorporated in World Bank Operating Procedures (O.P 4.12) if obtaining any sites for project use would cause economic and/or physical displacement*' (page 2 of the RPF). KOSAP is a flagship project of the Ministry of Energy financed by the World Bank which is aimed at providing electricity and clean cooking solutions in the remote, low density, and traditionally underserved areas of the country.

3. The requirement for Community Development Agreements (CDAs) is not included in NEP despite being in the Mining Act (section 109 (i)) and the Climate Change Act (section 23E (3-9)):

The NEP does not require the signing of CDAs between project proponents and host communities in land-based energy projects which is an unexplained departure from emerging best practices for project development and implementation of largescale land-based energy projects. This is likely to delay the mainstreaming of best practices in host community engagement and promotion of equitable and sustainable development in large-scale energy projects, which are cornerstones of just and equitable energy transition. Additionally, CDAs are required in the mining sector (section 109(i) of the Mining Act) and carbon credits projects (section 23E (3-9) of the Climate Change Act), indicating a recognition of their importance for equitable benefit sharing.

4. Contradictory position in NEP regarding clean energy transition vis a vis promotion of fossil fuels, coal and nuclear energy:
At the introductory stage, the NEP states that ‘[t]his Policy seeks to address the challenges of energy access, affordability, and security whilst **promoting clean energy solutions to reduce our dependence on fossil fuels and driving green industrialization** (page i of NEP).’ The NEP further states that ‘[t]he Policy outlines comprehensive strategies, frameworks, and initiatives that address the country’s energy access, efficiency, and sustainability challenges, while **positioning Kenya as a leader in the clean energy transition** (page x of NEP).

However, one of the policy goals/objectives under the NEP (page 108 of NEP) is to continue with oil and coal development activities and strengthen legal and regulatory frameworks to enhance the national energy security. Further, the NEP promotes the development and continued use of energy sources which are universally agreed to be dirty energy sources. For instance, with respect to coal, the NEP states that the country will benefit from sustainably exploiting the resource through ‘clean coal technologies’, to support its energy security. To achieve this objective, the NEP states that the government will:

- a. Promote sustainable development of coal resources to meet the country’s energy requirements;
- b. Develop and implement measures to promote clean coal technologies to mitigate environmental impacts; and
- c. Promote exploration and development of coal resources.

In addition to undermining climate commitments, the proposed development of new oil & gas and coal energy would slow down the energy transition and “reduce investor appetite as fossil assets are increasingly becoming difficult to finance” (Kenya Energy Transition Investment Plan, p. 1)

5. The NEP does not include clear Just and Equitable Energy Transition principles:
Finally, the NEP progressively anchors support for a just and equitable energy transition aligned with global climate goals. However, this strategic objective is not bolstered by clear principles of what just and equitable energy translates to in the Kenyan context. It is our recommendation that the Ministry include a set of clear principles contextualized for Kenya. As a minimum, those principles should align with the eight core principles of Just Energy Transformation developed by the Alliance for Just Energy Transformation (AJET) (whose members include the United Nations Development Program (UNDP), WWF and KPMG). The land and social challenges which have typified some of Kenya’s largest renewable energy projects especially compel the need for implementation of deliberate and focused just and equitable energy transition practices and principles.

Part B: Comments on the Draft Provisions

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

<p>1.</p>	<p>3.10.1 Coal Resources for Energy Production; and</p> <p>Item (viii) at page 108 (28. Energy Security) - Continue with oil and coal development activities and strengthen legal and regulatory frameworks to enhance the national energy security.</p>	<p>Provision:</p> <p>Kenya’s industrial energy demand continues to rise, and reliance on coal and other fossil fuels presents significant environmental, social, and economic risks. While the country has untapped coal reserves, global energy dynamics are shifting away from fossil fuels. Instead of locking into carbon-intensive infrastructure, Kenya can secure its energy future through clean, renewable alternatives such as geothermal, solar, wind, and emerging technologies like hydrogen.</p> <p>A just transition ensures that workers, communities, and industries dependent on fossil fuels are supported in shifting toward cleaner, more sustainable energy solutions. Electrification and alternative clean technologies can replace coal in industrial high-heat processes, ensuring energy security while reducing emissions and enhancing Kenya’s competitiveness in a decarbonising global economy.</p> <p>The draft policy’s proposal for coal-driven energy development undermines Kenya’s commitment to renewable energy development, including the development of the country’s vast geothermal potential. The development of these resources would not only undermine climate commitments but also run the risk of locking the country into a fossil fuel development pathway out of step with the turn to cheaper renewable</p>	<p>Prioritising electrification and alternative clean energy solutions, Kenya can future-proof its industries and position itself as a leader in green manufacturing, climate-resilient infrastructure, and sustainable economic growth.</p> <p>The shift away from coal is not just about reducing emissions it is about ensuring Kenya remains a competitive, attractive investment destination in a rapidly decarbonising global economy</p> <p>Further reasons for the proposed revision of this section of the policy include:</p> <p>1. Lack of Compliance with NEP Strategic Objectives Exploitation of coal would fundamentally undermine the draft policy’s strategic objective to supporting a “just and equitable energy transition aligned with global climate goals.” Climate Change and Just Energy Transition are among the key pillars of the draft policy and the country’s Energy Transition Investment Plan. Coal development would undermine both – particularly harming and impairing community resilience to climate change. It would also drive away much needed investment. According to the International Renewable Energy Agency (IRENA), “new renewable power generation projects now increasingly undercut existing coal-fired plants.” Specifically, IRENA notes in its 2023 report on</p>
-----------	--	---	--

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

		<p>energy alternatives. This last risk poses significant risk of stranded assets which would place costly burdens on Kenyan taxpayers.</p> <p>Proposal: The sections on coal development should be revised to include a clear commitment to prioritise the country’s ample renewable energy alternatives.</p> <p>To achieve this objective, the Government should commit to:</p> <ul style="list-style-type: none"> i. Phase out coal exploration and development and substitute fossil fuels as a heat source and/or feedstock with green and blue hydrogen and hydrogen derivatives. ii. Electrify industrial processes by transitioning high-heat industries to geothermal, solar thermal, wind, integrated with advanced energy storage solutions. 	<p>Renewable Power Generation costs that “the least cost of energy of solar PV was 56% less than the weighted average fossil fuel-fired alternatives in 2023.”</p> <p>2. Adequate Geothermal Resources Unlike most other countries, Kenya’s vast geothermal resources are ample to meet baseload demand, which is the common justification for coal-fired development. The pursuit of coal development would exacerbate an existing challenge identified at section 2.2.1.2, namely “the sub-optimal energy mix in the system that results in the underutilization of geothermal generation at certain times of the day, leading to steam venting.”</p> <p>3. Increase Kenya’s Green House Gas Emissions Investment in coal carries the risk of locking the country into high GHG-emitting technologies which are likely to end up as stranded assets due to their high costs. Any coal investments will also contravene the country’s bold proclamations of global leadership in the clean energy transition, which it has translated into a coherent and persuasive energy transition investment plan.</p>
2.	2.2.3 Electricity Retail	Provision:	1. Inadequate Oversight in Procurement Processes

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

		<p>The draft policy flags take-or-pay clauses in power purchase agreements as a challenge but makes no substantive recommendations for redress.</p> <p>Proposal: The policy should include as an objective, the formulation of standard PPAs and proposed Government Letters of Support as a measure of safeguarding against PPA terms which lock-in the regulator into unfavourable long-term contracts.</p>	<p>PPA procurement lacks proper oversight which the 2021 Presidential Taskforce on Review of Power Purchase Agreements flagged as a problem. This draft policy presents an opportunity to anchor the recommendations of the Taskforce as a specific priority area to ensure the objective of affordable, reliable and sustainable energy is met.</p>
3.	<p>2.11.1 Crude Oil and Liquid Petroleum Products; and</p> <p>Item (ii) at page 100 (24. Natural Gas) - Facilitate development and utilization of natural gas and associated infrastructure</p>	<p>Provision: The draft policy proposes the conversion of existing thermal power plants to liquefied natural gas (LNG) effectively promoting LNG as a transition energy source. However, having elaborately set out the wealth or renewable energy options available to Kenya, the justification for taking this policy position is not clear.</p> <p>Proposal: Remove the option of LNG as a transition energy source in favour of the range of renewable energy options open to Kenya.</p>	<p>1. Unsustainable Gas Investment The proposed shift to gas as proposed will lock Kenya into an unsustainable gas sector. Investment in such energy sources will create a huge opportunity cost in available public and private financing for cleaner renewable energy options.</p>

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

<p>4.</p>	<p>3.8 Energy Transition and Climate Change (page 50); and</p> <p>22. Energy Transition and Climate Change (page 97).</p>	<p>Provision: The provision states the actions the Government will take to mitigate climate change and enhance the Just Energy Transition.</p> <p>Proposal: We recommend that the policy should include:</p> <ol style="list-style-type: none"> 1. A dedicated Just Energy Transition Chapter which establishes clear principles, targets and strategies, ensuring equity in energy access, workforce transition, and financing mechanisms. 2. Mainstream Just Energy Transition across the Energy Policy. 3. Align the Just Energy Transition Plans with Kenya’s Energy Transition Investment Plan 4. Establish a Just Energy Transition Oversight Body to monitor progress and compliance. 5. Explore a Just Energy Transition Bill for long-term legal and policy anchoring. 6. Requirement for Community Development Agreements (CDAs) to mainstream the best practices in host community engagement and promotion of equitable and sustainable development in large-scale energy projects, which are cornerstones of just and equitable energy transition. 	<p>While Just Energy Transition is already incorporated into the Kenya Energy Policy, its current framing lacks specificity, clear implementation pathways, and strong institutional mechanisms. Strengthening the Just Energy Transition in the policy is not just about energy transition; it is about ensuring equity, economic resilience, and climate justice while safeguarding Kenya’s development priorities.</p> <p>The proposed amendments are further anchored on the following reasons:</p> <p>1. Alignment with NEP and Global Climate Commitments</p> <p>The recommendation aligns with the Policy’s principles, national priorities and global sustainability goals in Section 1.5 which states the Commitment to renewable energy development, reduced emissions, and climate resilience.</p> <p>The goal of this Policy under section 1.4 is to provide reliable, competitive, affordable and sustainable energy to support national development and just energy transition.</p> <p>Aligns with the Policy’s principles in Section 1.5 which provides for Energy Equity and Inclusivity: Ensuring universal access to affordable energy while empowering marginalized communities.</p>
-----------	---	---	--

No.	Specific Policy Section	Comments/Proposal	Justification
		<ul style="list-style-type: none"> 7. Develop a framework to implement effective local community engagements and consultations. 8. Develop a framework to implement best resettlement practices in land-based energy projects in alignment with the Resettlement Policy Framework (RPF) dated September 2024 adopted for the Kenya Off-Grid Solar Access Project (KOSAP). 9. Ensure that the local communities are incorporated in the energy transition through meaningful consultations on what core principles of energy transition are a priority in the Kenyan context. 10. Ensure that mechanisms for community-led local ownership models for energy projects are expressly provided as part of sector legal reforms. 	<p>2. Alignment with the Resettlement Policy Framework (RPF)</p> <p>This proposal also aligns with the already adopted Resettlement Policy Framework (RPF) dated September 2024 (for the Kenya Off-Grid Solar Access Project (KOSAP)). There is no reason why these higher standards and principles of protection of marginalised communities should not be extended to all the developers in the energy sector (both Grid and Off-Grid).</p>
5.	2.2.1.5 Nuclear Energy	<p>Provision:</p> <p>The section provides that nuclear energy is one of the key areas that Kenya seeks to explore in power generation. It further highlights several elements of nuclear energy exploration that would cause negative impacts to the environment, sustainability and Kenya’s energy mix.</p> <p>Proposal:</p> <p>We recommend that the Draft Energy Policy should exclude nuclear energy for the following reasons:</p>	<p>1. Does not conform with the principles and objectives in the National Energy Policy and Government’s development plan of Sustainability and Climate Action in the NEP</p> <p>The implementation of the nuclear energy program contradicts the Draft National Energy Plan’s objectives which include sustainability and climate action. The production of nuclear energy requires uranium which is a non-renewable source of energy. Additionally, carbon emissions do occur during the mining, refining,</p>

No.	Specific Policy Section	Comments/Proposal	Justification
		<ol style="list-style-type: none"> 1. The procurement of nuclear energy is estimated to have a high capital cost to develop and sustain the power plant and production which would surpass renewable energy sources such as wind or solar energy. This directly contradicts the obligation for competitive power procurement. 2. It directly contradicts the Draft National Energy Plan's objectives which include sustainability and climate action. The production of nuclear energy requires uranium which is a non-renewable source of energy. Additionally, carbon emissions do occur during the mining, refining, and processing of uranium fuel, which is needed to operate the reactor. Therefore, it is not economically or factually correct to state that nuclear energy has no carbon emissions while only evaluating the process of power production as it is also important to look at the life cycle of the uranium which is used to produce nuclear energy. 3. Finally, the operation of a nuclear power plant would make Kenya dependent on imported Uranium to generate nuclear fuel. This is as opposed to renewable energy sources such as geothermal, wind, solar and hydropower which we 	<p>and processing of uranium fuel, which is needed to operate the reactor. Therefore, it is not economically or factually correct to state that nuclear energy has no carbon emissions while only evaluating the process of power production as it is also important to look at the life cycle of the uranium which is used to produce nuclear energy.</p> <ol style="list-style-type: none"> 2. Does not align with the principles and objectives in the National Energy Policy and Government's development plan of competitive energy procurement and pricing The procurement of nuclear energy is estimated to have a high capital cost to develop and sustain the power plant and production which would surpass renewable energy sources such as wind or solar energy. This directly contradicts the obligation for competitive power procurement. 3. Impairs Kenya's goal of Energy Independence due to Uranium imports Finally, the implementation of the nuclear energy program requires the importation of uranium as the resource required to generate nuclear fuel. This will make Kenya dependent on imported Uranium to generate nuclear fuel. This is as opposed to renewable energy sources such as geothermal, wind, solar and hydropower which we extract in Kenya and would ensure our energy independence and security.

		<p>extract in Kenya and would ensure our energy independence and security.</p>	
--	--	--	--

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

			<p>4. Does not align with the principles and objectives in the National Energy Policy and Government’s development plan to Support green industrialization, environmental and social sustainability. The implementation of the nuclear power program would further have excessive and disproportional impacts to communities in Kwale and Kilifi which are the two areas that have been earmarked by Nuclear Power and Energy Agency (NuPEA) as possible sites for power plant development. The program would impact the livelihood of the local communities who depend on tourism. There are also potential risks to public health and the environment and livelihood in the event of a nuclear spill. Further the implementation would have direct impacts of global heating on coral reefs, aquatic life whose cooling system would suck large amounts of water from the ocean and return it a few degrees warmer, potentially killing fish and the micro-organisms.</p> <p>5. Risk of Grid Failure by adding Nuclear Energy to the Transmission Infrastructure The addition of nuclear energy to Kenya’s national grid without significant and expensive upgrades to power transmission infrastructure, would disrupt the country’s energy balance of supply and demand and trigger power cuts. These factors do not seem to have</p>
--	--	--	--

No.	Specific Policy Section	Comments/Proposal	Justification
			been factored into a least cost analysis to inform the decision for nuclear development.

6.	3.10.2 Natural Gas	<p>Provision: The Government will:</p> <ul style="list-style-type: none"> i. Strengthen the legal and regulatory framework for the oil and gas sector to include the natural gas industry; ii. Facilitate development and utilization of natural gas and associated infrastructure. <p>Proposal: We recommend that the NEP should align with Kenya’s Energy Transition Investment Plan (ETIP) and support a just and sustainable energy transition. The ETIP provides that the Government shall:</p> <ul style="list-style-type: none"> i. Integrate natural gas within a structured transition framework, ensuring it serves as a temporary bridging fuel with a clear phase-out strategy aligned with Kenya’s net-zero commitments. ii. Strengthen the legal and regulatory framework for the oil and gas sector, ensuring natural gas development aligns with climate goals, environmental safeguards, and energy security priorities. iii. Promote equitable access to clean energy by incentivizing non-fossil alternatives such as green hydrogen, biogas, and electrification solutions. 	<p>1. Compliance with Principles of Just Energy Transition, the NEP global Sustainability Commitments</p> <p>As Kenya transitions towards a low-carbon economy, natural gas is recognised as a temporary bridging fuel to facilitate the shift away from more carbon-intensive energy sources like coal, kerosene, and biomass. However, without a structured phase-out strategy, reliance on natural gas could hinder long-term decarbonisation goals.</p>
----	--------------------	--	--

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

		<p>The policy directly contradicts the recommendation as it as it does not recommend the development on gas in a transition context aligning with climate goals and net zero commitments.</p>	
<p>7.</p>	<p>3.14.1 Land Acquisition Kenya's energy sector faces significant challenges in land acquisition and management. These include inadequate legal frameworks, stakeholder disputes, and insufficient funding, compensation grievances, leading to delays in project implementation.</p>	<p>Provision: In the Section the Government proposes to:</p> <ul style="list-style-type: none"> i. Develop and implement a standardized framework for land and wayleave acquisition for energy projects; ii. Implement public sensitization and participation programs for energy projects and programmes <p>Proposal: To assist in developing and implementing and standardising the framework for land acquisition. We recommend that they:</p> <ul style="list-style-type: none"> i. Ensure alignment with principles of Free, Prior, and Informed Consent (FPIC) for indigenous and local communities. ii. strengthen resettlement and compensation mechanisms to safeguard community land rights, ensuring equitable and timely compensation for affected populations (please refer to the principles and practices in the <i>Resettlement Policy Framework (RPF) dated September 2024 (for the Kenya Off-Grid Solar Access Project (KOSAP))</i>). iii. establish clear guidelines for identifying energy resource areas early, as provided for under the 	<p>Compliance with the requirement to comply with the principles set out in the Updated Resettlement Policy Framework (RPF) adopted under the Kenya Off-Grid Solar Access Project (KOSAP)</p> <p>1. As Kenya advances its energy sector, it is essential to ensure that land acquisition processes are transparent, inclusive, and equitable. Land is central to the livelihoods, cultural heritage, and environmental well-being of many communities, and energy development must be approached in a way that respects community rights, promotes sustainable land use, and upholds environmental safeguards. There is no reason why these higher standards and principles of protection of marginalised communities should not be extended to all the developers in the energy sector (both Grid and Off-Grid).</p>

No.	Specific Policy Section	Comments/Proposal	Justification
		<p>Energy Act, to mitigate disputes and provide certainty for all stakeholders.</p> <p>iv. implement stringent Environmental and Social Impact Assessments (ESIAs), including cumulative impact assessments, to prevent ecological degradation and uphold biodiversity conservation in energy development.</p> <p>v. prioritise sustainable land use planning that balances energy development with climate resilience, protecting ecosystems, water sources, and biodiversity hotspots from unsustainable resource exploitation.</p> <p>vi. implement robust public engagement and participation programs for energy projects, ensuring public concerns are adequately considered and addressed.</p>	
8.	3.2.1.3 Variable Renewable Energy (Wind and Solar) (VREs)	<p>Provision: The NEP acknowledges that Variable Renewable Energy (VREs), such as solar and wind power, are important in the global transition to sustainable energy systems. However, the intermittency of these resources necessitates optimal energy planning and integration measures for grid reliability and stability. In Kenya, leveraging VREs aligns with national goals to diversify the energy mix, reduce carbon emissions, and foster energy access.</p> <p>Recommendation:</p>	<ol style="list-style-type: none"> 1. Commitment to Just Energy Transition To ensure a just, resilient, and future-proof energy transition, Kenya’s Energy Policy must fully incorporate solar and wind energy through strong policy commitments, investment incentives, and decentralized energy solutions 2. Accelerate the Transition Maximizingtheseresourcescanaccelerate Kenya’s transition to a clean energy future while ensuring energy security and affordability. 3. Create Energy Independence
No.	Specific Policy Section	Comments/Proposal	Justification

		<p>Despite Kenya’s abundant solar and wind resources, their potential remains underutilized within the energy policy framework.</p> <p>We recommend that in addition to the actions that government proposes in the NEP, they should additionally include the following actions to achieve the above objective:</p> <ul style="list-style-type: none"> i. Mandate integration of solar and wind energy into the national grid to enhance stability, efficiency, and reliability; ii. Incorporate policy-backed incentives such as feed-in tariffs, net metering, and tax exemptions to attract investment in solar and wind energy; iii. Prioritize energy access in rural and underserved urban communities through decentralized solar and wind projects. 	<p>Kenya can unlock the full potential of VREs to support its sustainable development agenda by addressing challenges such as intermittency, waste management of VRE technologies, and over-dependence on imported technologies and storage solutions</p> <p>4. Local Impacts</p> <p>Additionally, prioritizing local production of solar panels and wind components will create jobs, support technology transfer, and reduce reliance on costly imports.</p>
--	--	--	---

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

9.	2.15.2 Environment and Energy	<p>Proposal: Elevate the current section into a dedicated chapter on Environment, Energy, and Climate Change to provide a more thorough and integrated approach. We recommend expanding the content to include:</p> <ol style="list-style-type: none"> 1. Comprehensive strategies for climate mitigation and adaptation, with clear targets for reducing GHG emissions from the energy sector. 2. Policies to promote nature-based solutions and biodiversity conservation in energy planning. 3. Clear guidelines for balancing energy development with ecosystem preservation. 4. Stronger mandates for Environmental and Social Impact Assessments (ESIAs), including cumulative impact assessments and robust monitoring frameworks. 5. Provisions to ensure community participation and safeguard indigenous land rights in the planning and implementation of energy projects. 6. Integration of just transition frameworks to align energy development with both environmental sustainability and social equity goals, ensuring that Kenya meets its climate commitments while fostering inclusive economic growth. 7. Explore alternative clean energy options with lower environmental risks before committing to nuclear energy, ensuring that Kenya's energy 	<ol style="list-style-type: none"> 1. Need for tand-alone Chapter Section 2.15.2 (<i>Environment and Energy</i>) is currently positioned within the Situational Analysis rather than as a standalone chapter, limiting its ability to comprehensively address the complex and evolving relationship between energy development, environmental protection, and climate change. 2. Inadequate Depth and Analysis The section lacks the depth and detail necessary to reflect the urgency and scale of Kenya's environmental challenges, nor does it offer actionable solutions to mitigate the ecological footprint of energy projects. 3. Overlooks the Social and Environmental Impact of Energy Projects Overlooks the cumulative environmental impacts of multiple energy projects, particularly in ecologically sensitive areas, and fails to outline mechanisms for long-term environmental monitoring and accountability. 4. Inadequate focus on Just Energy Transition Principles There is minimal focus on just transition principles, which are essential for ensuring that the shift to cleaner energy sources protects both ecosystems and the rights and livelihoods of vulnerable populations.
----	--------------------------------------	--	--

No.	Specific Policy Section	Comments/Proposal	Justification
-----	-------------------------	-------------------	---------------

		<p>future aligns with climate resilience and sustainability goals.</p>	<p>5. Inadequate Community Engagement and Public Participation The section also fails to adequately emphasise community engagement and public participation in energy planning, especially for communities directly affected by energy projects.</p> <p>6. No reference to Kenya's NDCs Notably, there is no mention of Kenya's contribution to greenhouse gas (GHG) emissions from the energy sector, nor are there strategies outlined for reducing these emissions in line with Kenya's Nationally Determined Contributions (NDCs) under the Paris Agreement.</p>
--	--	--	--