To what extent are Multilateral Development Banks integrating Climate Change Adaptation Finance in their Development finance?

The case of World Bank and African Development Bank in Kenya

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List of Acronyms

ADB: Asian Development Bank

AfDB: African Development Bank

ASAL: Arid and Semi-Arid Lands

COP: Conference of Parties

EBRD: European Bank for Reconstruction and Development

FGD: Focus Group Discussion

GDP: Gross Domestic Product

GoK: Governement of Kenya

GEF: Global Environmental Facility

IDB: Inter-American Development Bank

IDBRG: Inter-American Development Bank Group

IDFC: International Development Finance Club

IMF: International Monetary Fund

IPCC: Intergovernmental Panel for Climate Change

KCCWG: Kenya Climate Change Working Group

MDB: Multilateral Development Banks

NAP: National Adaptation Plan

NCCAP: National Climate Change Action Plan

ODA: Official Development Assistance

UNEP: United Nations Environmental Programme

UNFCCC: United Nation Framework Convention on Climate Change

FOREWORD

This case study was prepared by the African Centre for Technology Studies (ACTS) as an input to the "Mobilizing Development Finance of Strategic and Scaled-up Investment in Climate Adaptation" research project, which was implemented by the International Institute for Sustainable Development (IISD) in partnership with ACTS in Kenya, Libélula in Peru, and Prakriti Resources Centre in Nepal. Funding for the project was provided by Canada's International Development Research Centre (IDRC).

The research project explored challenges to scaling up finance for adaptation across different contexts and opportunities to overcome these constraints. This case study explored the progress made by multilateral development banks (MDBs) to track adaptation co-benefits in their portfolios in Kenya, to incorporate climate risk in their development finance portfolios in Kenya, and to align their investments and grant finance with Kenya's national adaptation priorities. The case study was prepared to inform an IISD research paper that explored the challenges of integrating adaptation considerations into MDBs' development finance and opportunities to address these constraints.

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Case Study Summary

Purpose and objectives

The purpose of this case study was to examine the extent to which the World Bank and the African Development Bank, which are the two major Multilateral Development Banks (MDBs) with the biggest finance portfolio in Kenya, are mainstreaming climate change adaptation finance in their development plans. Specifically, the study reviewed the progress that the two banks are making to scale up financing of climate change adaptation in their programs in Kenya; how they are mainstreaming adaptation considerations and incorporating climate risk in their development finance portfolios; and how they align their portfolios with Kenya's climate change adaptation priorities.

Methodology

The case study adopted a mixed-methods approach involving a review of secondary data, archival research and primary data collected through interviews and focus group discussions with senior government and MDB officials, as well as civil society actors.

Findings

Overall, the study shows that concerted efforts by the Government of Kenya to institutionalize and publicize climate change adaptation as the main strategy for managing climate change in the country appear to be bearing fruits. Results from archival data analysis, as well as interviews with MDB officials, indicate that both MDBs have invested heavily, and prioritized climate change adaptation finance in Kenya. Results from this case study, therefore, point to the potential shift of climate finance trends in the global south, where mitigation has traditionally attracted more finance, mostly because of the bankable business cases associated with mitigation projects, despite climate change adaptation finance remaining the main need for such countries due to their high vulnerability to the adverse impacts of climate change. Interviews with government officers indicated that the government has been "fighting hard" to institutionalize this need and influence its partners towards this reality. Yet, with specific reference to the World Bank, where long-term project-level data is available, trend analysis over the period 2013 and 2019 suggest a slight declining trajectory for adaptation finance as compared to a growth trajectory for mitigation finance. This implies that ongoing efforts by the World Bank and the Government of Kenya to enhance climate change adaptation must be sustained towards addressing Kenya's vulnerability to adverse impacts of climate change.

Challenges

Although some progress has been made, challenges still exist in the process of tracking, reporting and mainstreaming climate change adaptation finance in development finance. These include methodological gaps that see these main MDBs adopting different national-level climate finance tracking approaches, low capacity and involvement of local experts among others in projects design as well as in the determination of adaptation finance. Other challenges include bifurcation among Key actors involved with the planning, execution and reporting on climate change adaptation, with different government departments adopting diverse strategies, as well as the lack of a well-functioning public-civil society-private partnership in the tracking and reporting of in-country climate change adaptation finance.

Possible solutions

These challenges could be addressed through enhanced cooperation among MBDs in the execution of climate finance tracking and reporting methodologies in line with their 2015 commitment to the five Voluntary Principles for Mainstreaming Climate Action in Financial Institutions. Enhanced capacity building and more active engagement of stakeholders in the design of climate-sensitive projects and programs could promote an enhanced mainstreaming of climate adaptation finance in the design and implementation of MDB financed programs in the country. To reduce the divergence in approaches to planning and actualizing climate change adaptation plans and promote national tracking and reporting of climate change, the Climate Finance Unit of the National Treasury and the Climate Change Directorate need to enhance partners coordination and reporting not just among national and county government departments but also including civil society and private sector actors as these are an important player as well.

1. Introduction

Problem Statement

Despite their historical minimal contribution to global climate change, developing countries such as Kenya remain the most vulnerable to the adverse impacts of climate change. Their high vulnerability can be attributed to a variety of factors, which include an overreliance on climate-sensitive economic activities such as agriculture, as well as the weak economic capacity to respond to climate-related disasters such as drought and floods. The economic after-effects of the COVID-19 pandemic, which the World Bank projects will shrink Africa's economic growth from 2.4 in 2019 to between -2.1 to -5.1%,(World Bank Group (WBG), 2020) are likely to exacerbate this situation.

Multilateral Development Banks (MDBs) can and do contribute to filling the climate finance gap in developing countries. These institutions have about half of the global public climate funding (Thwaites, 2019). MDBs have made considerable progress in making public their financial commitments towards climate action. For instance, between 2011 and 2018, the six major MDBs [the African Development Bank (AfDB), the Asian Development Bank (ADB), the European Bank for Reconstruction and Development (EBRD), the European Investment Bank (EIB), the Inter-American Development Bank Group (IDBG) and the World Bank Group (WBG)] collectively committed almost US$ 237 billion in climate finance (Inter-American Development Bank (IDB), 2019). MDBs also catalyze additional finance through co-financing arrangements with other international organizations, state, and non-state actors. MDBs are also key players in the regional development planning and discourses through non-lending undertakings such as collaborative research and capacity building of state, national and regional private sector actors.

Despite increasing transparency and publicity around MDB's role in mobilizing finance for climate change, there remains a limited understanding of the extent, processes, opportunities and constraints related to MDBs' efforts to mainstream climate finance in their development finance at country levels. This case study responds to this gap.

Purpose, objectives and justification

The purpose of this case study is to explore the progress and constraints to MDBs' efforts to mainstream climate adaptation across their finance and investment portfolios and to identify opportunities to overcome these constraints. The objectives of the case study (with a particular reference to the two MDBs with the biggest finance portfolio in Kenya – the World Bank (WB) and the Africa Development Bank (AfDB)) - is to review the progress that the two Banks are making to scale up financing for climate change adaptation in their programs in Kenya; how they are mainstreaming adaptation considerations and incorporating climate risks in their development finance portfolios; and how they align their portfolios with Kenya's climate change adaptation priorities.

A focus on finance for climate change adaptation is justified, as Kenya's legislation and policies on climate change, such as the Climate Change Act 2016, the updated Nationally Determined Contribution (NDC), National Climate Change Action Plan (2018-2022) underline that the country's vulnerability to climate change remains high, necessitating diverse climate change adaptation investments. Indeed, out of the USD 62 billion required by Kenya to adapt to and mitigate climate change, the cost of climate change adaptation amounts to USD 44 billion by 2030. The Government of Kenya has stated that 90% of the finance need to be sourced from international actors. One of the potential external flows would be from MDBs, which are most actively engaged in Kenya.

Structure of the case study report

The case study is structured as follows: The next section presents the methodology adopted for the study, followed by a presentation of the study findings. The first part presents the evolving nature of Kenya's climate change policy followed by an exploration of the World Bank's and AfDB's development and climate change adaptation finance flow for the period 2013-2019. This analysis also examined how the two MDBs assess climate risk and incorporate climate vulnerability reduction measures in their programs and projects. In addition, this section explores how World Bank and ADB programs and financial flows are aligned with Kenya's adaptation actions, and how these MDBs make decisions regarding finance for climate adaptation. This is followed by an examination of the extent to which both MDBs integrate gender consideration in their program design. Finally, the case study discusses the main constraints and opportunities to scale up MDB support for climate adaptation and sets out recommendations for improving the mainstreaming of adaptation in development finance in Kenya.

2. Methodology

The study draws from both secondary and primary qualitative and quantitative data. Secondary data has been obtained from published work and data from online archives of the AfDB (https://projectsportal.afdb.org/dataportal/VProject/search) and the World Bank (https://www.worldbank.org/en/region/afr/projects/all). Primary data was collected through key informant interviews and Focus Group Discussions (FGD). Two (2) interviews were undertaken with three (3) AfDB officials responsible for climate change management in East Africa; one interview was undertaken with two (2) officials from the World Bank's Africa Region

Climate Change Office. Three interviews were conducted with officers from the National Treasury (1) and Climate Change Directorate (2). In addition, one (1) Focus Group Discussion was undertaken with eight Government of Kenya officers based at the national offices of ministries involved with climate change adaptation planning, implementation and monitoring; and one FGD with 8 officials from the Kenya Climate Change Working Group, a civil society organizations network extensively involved with climate change advocacy in Kenya. Due to challenges related to Covid-19, all the discussions were undertaken online through licensed platforms namely Zoom and Teams. The discussions were recorded with the permission of participants and were later transcribed before analysis. Quantitative data analysis was undertaken through Microsoft Excel while qualitative data analysis was achieved through content analysis. The analysis was guided by key themes detailed in the study's research protocol including: MDBs and international guidance on tracking flows of finance for adaptation; trends in flows of MDB investment for climate adaptation; MDBs and climate risk in development finance supported projects and programs; MDB financial flows vs. priority adaptation actions in Kenya.

3. Findings

3.1 The evolving nature of Kenya's climate change policy context

The formulation of the National Climate Change Response Strategy (2010) inaugurated Kenya's institutional and systematic approach to the management of climate change (GoK, 2020; GoK, 2016). Initiatives aimed at managing climate change-related extremes did exist before this, but these projects were sector-based, implemented through the government ministries and non-state actors. Such initiatives did not necessarily identify interventions as either climate change adaptation or mitigation even though they contributed to climate resilience. GoK (2020) states that pre-2010 climate change interventions were response/humanitarian oriented while GoK (2016) points to the uncoordinated nature of such responses. Yet, to some extent, this practice continues to-date[1] despite the existent of an elaborate climate change governance structure.

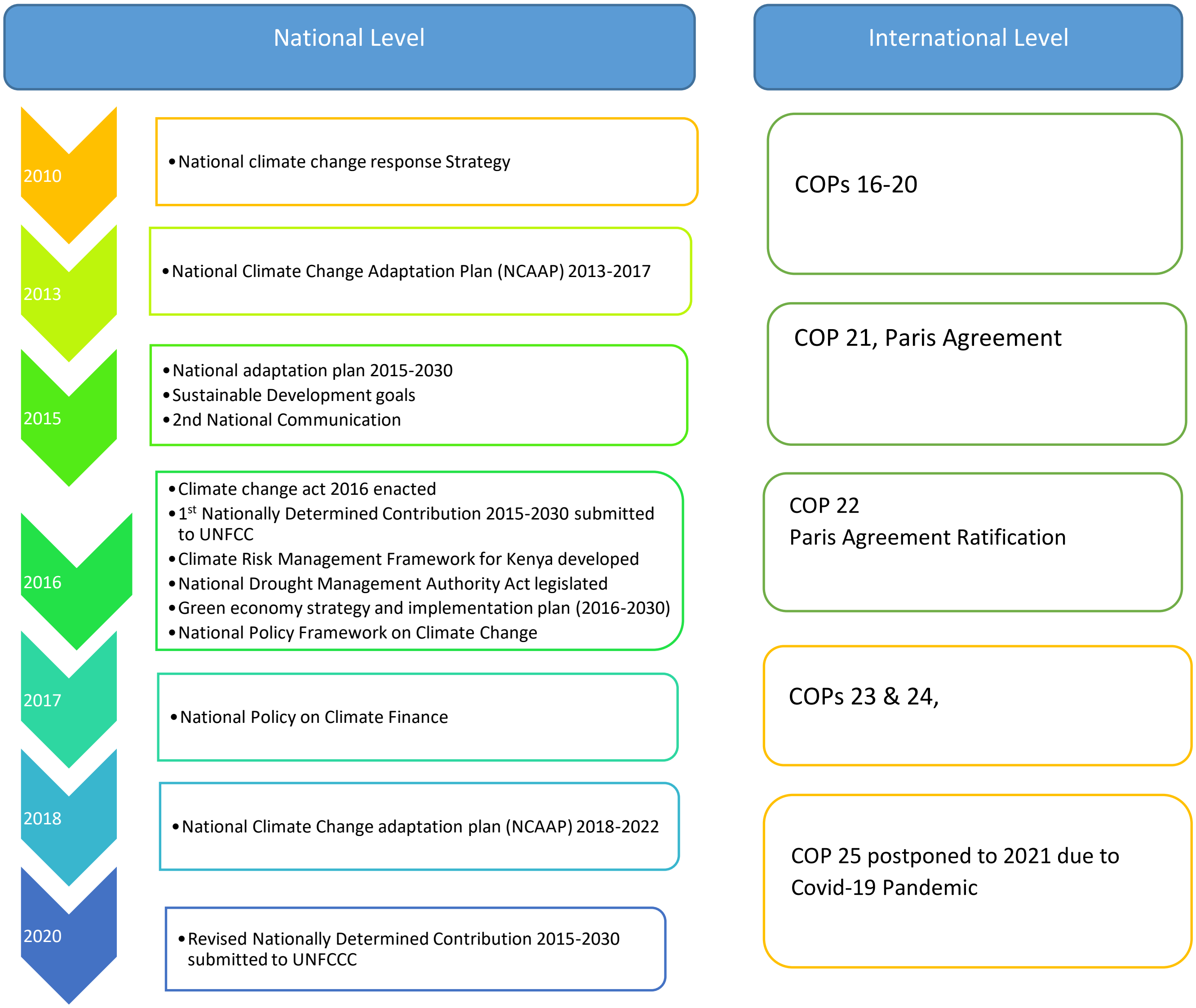
The Climate Change Response Strategy (2010) therefore became a "key Government climate change agenda guide, informing nationwide climate change programs and development activities including the formulation of climate change policies" (GoK, 2010:3). It advanced the integration of climate change adaptation and mitigation into all government planning, budgeting and development objectives. The strategy situates climate change governance within the global UNFCCC-led climate change governance framework which Kenya ratified in 1994, presents scientific evidence of climate change and its adverse impacts in Kenya while outlining potential climate change mitigation, adaptation and climate change communication plans for the country.

[1] GoK, 2016:43; Focus Group Discussions with Government and Civil Society representatives held on 23rd October 2

The National Climate Change Response Strategy emphasizes the need for a favorable climate change policy and legislative framework for the country.

During the decade spanning 2010-2020, an elaborate climate change management institutional infrastructure significantly evolved as summarized in figure 1 below. The resultant institutional framework propelled Kenya to a positional of regional (to global) leadership on climate change in the establishment of institutional frameworks necessary for climate change management (Ageyo & Muchunku, 2020). The framework is anchored on the Constitution of Kenya (2010) as well as the global UNFCCC climate change governance regime. On the one hand, the Constitution of Kenya requires that all Kenyan citizens enjoy diverse basic social and economic rights which include but not limited to a clean environment, clean and safe water as well as food in quality and adequate quantity. It also devolves governance from the central government to 47 counties which are mandated to provide many basic services (such as health, agriculture, water etc.) and collaborate with the national government to protect citizens from harm resulting from human and natural disasters. The constitution also requires that international treaties entered by Kenya undergo a ratification process for domestication. This requirement applies to Kenya's participation in the UNFCCC climate change negotiation processes which often generate non-binding international agreements aimed at collaborative climate change adaptation and mitigation efforts to combat global climate change. The country has committed to continue providing leadership in climate action by "communicating a fair and ambitious contribution" to the UNFCCC processes (Government of Kenya, 2015). Kenya's updated NDC has increased its Green House Gas (GHG) emission reduction ambition from 30% to 32% relative to the business as usual scenario by 2030. Yet, important questions about the effectiveness of Kenya's elaborate policy and legislative framework in mobilizing effective adaptation (and mitigation) action has been raised. Odhengo et al., (2019) for instance notes that constrained innovation capabilities have limited the capacity of Kenya's elaborate climate change management framework to contribute tangibly to reduced climate change risks and impacts. In a recent study, Ageyo & Muchunku (2020:5) find out that the lack of "effective knowledge sharing" in disseminating the wealth of information about climate change held at the national level to the Kenyan population has been poor, constraining the capability of the Kenyan populace to take necessary measures to respond to climate change.

Figure 1: *Snapshot of the evolution of the Kenya climate change management architecture and alignment with key UNFCCC meetings, 2010 and 2020*



Source: *Authors*

3.2 Multilateral Development Banks finance flows for climate change adaptation in Kenya.

3.2.1 World Bank's understanding and efforts to mainstream climate change adaptation

The World Bank conceptualizes climate change adaptation as an integral part of the development cycle. This was well reflected in the discussion with the Bank's representative as well as in its publications (See, for instance, World Bank, 2020). Towards this end, the Bank endeavors to support countries "to systematically incorporate climate risks and opportunities in their development planning process" (ibid:1). According to the Bank's Representative:

"…The Bank has given a lot of importance to the climate change in the context of its operations, looking at a development centered climate approach particularly in the African region which is important for the development agenda for most client countries" (Interview with World Bank Representative, 7th May 2021)

While some government officers in Kenya indicated that this process occurs through a highly interactive and consultative process, a majority of officers in the Focus Group Discussion as well those interviewed felt that there are opportunities for this process to be improved by ensuring more involvement and capacity building of government experts in this process.

> *"In terms of being engaged during the planning process, there is room for improvements such as engaging donor coordinating forums more vigorously in a clear process, where priorities would be mainstreamed more clearly. For now, there are a few gaps since the donor coordination forums are not regular". (FGD Participant, 23rd October 2020)*

In its endeavor to mainstream climate change adaptation in its development projects, the World Bank states that it screens all its projects against climate and disaster risk (World Bank (2016)[2]. This process is undertaken through dedicated tools and departments that ensure due considerations for impacts of climate change on projects as well as integrating climate change adaptation (and mitigation) in the design of project (Interview with WB representative, 7th May 2021). This endeavor is supported by five key overarching strategies encapsulated in the Bank's Climate Change Action plan as shown below:

Figure 2: *World Bank Climate Change mainstreaming pathway*

- Implementation: focus on accelerating support for countries and companies to implement the plans they have developed;
- Convergence: fully integrate WBG climate and development agendas into strategies and operations, and align global- and country-level action;
- Maximizing impact: Increase focus on impact at scale, including shaping national investment policies and programs and mobilizing private finance;
- Resilience: Re-balance the bank's climate portfolio; putting a greater focus on adaptation and resilience.
- Transformation: Shift from business as usual; focus on facilitating transformational impacts.

Source: *World Bank (2016)*

According to the Bank, these strategies are actualized through multiple actions which include but are not limited to deliberate cooperation with countries to support the implementation of their Nationally Determined Contribution (NDCs); scaled-up climate action in areas of renewable energy, water, land and food security; and enhanced collaboration with other actors including

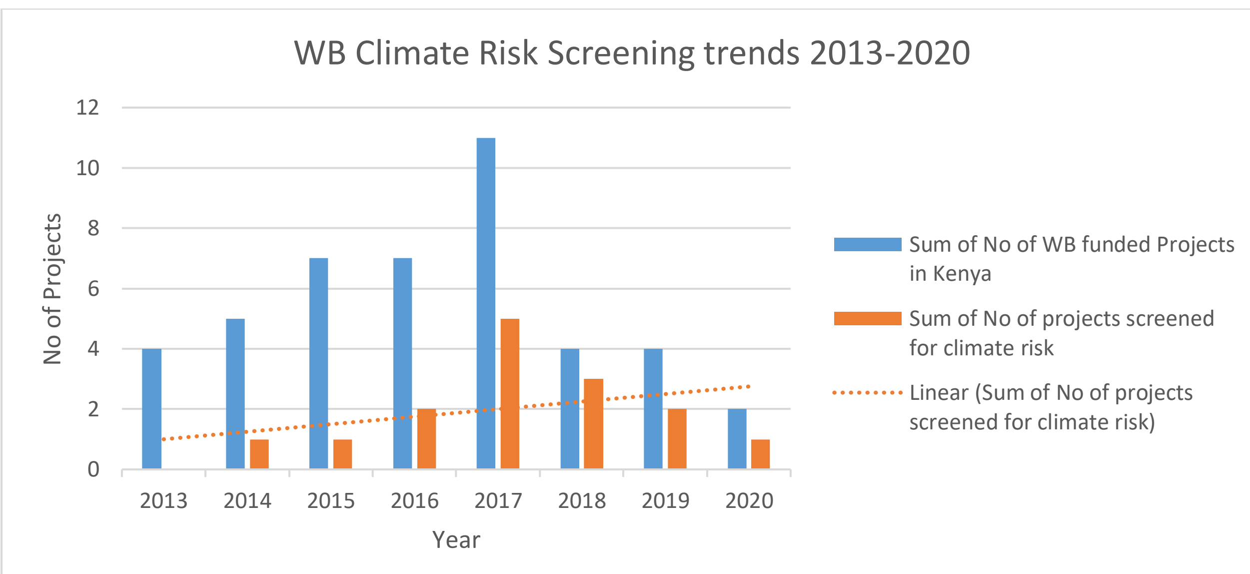
[2] Interview with WB representative, May 2021

other multilateral banks. In Kenya, a government official stated that the National Treasury is particularly involved in the co-design of climate change adaptation projects with the World Bank. Some of the officers however highlighted the need for enhanced capacity and participation among the Kenyan experts involved in the process.

> *"The Climate Change Directorate is involved in designing the projects financed by the World Bank in Kenya. However, our mandate is one very important element in ensuring that whatever we have discussed comes to fruition. Right now, this capacity may need to be further built and we are doing a lot towards this end" Interview with Government Officer, 5th July 2021*

> *"…unfortunately all project proposals don't come through our offices. However, for the projects that we get involved in we make sure that we prioritize climate change adaptation." Interview with Government Officer, 7th July 2021*

To understand the extent to which the Bank's projects are subjected to climate screening, we undertook a digital check on project documents for projects implemented in Kenya between 2013 and 2020. The result showed that 38% of the projects had been screened for climate risk. As indicated in the table below, a tendency by the World Bank to screen its projects against climate risk appears to be increasing over time, indicating that the Bank is putting more consideration on this aspect of the design of its projects over time.



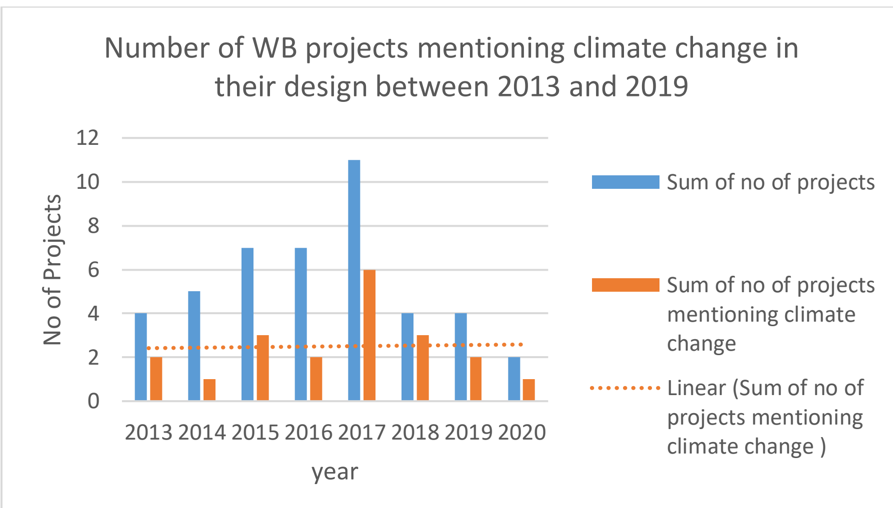
Source: Based on data from diverse project documents on World Bank's Project in Kenya https://www.worldbank.org/en/region/afr/projects/all

3.2.2 World Banks development and climate finance in Kenya

Between 2013 and 2019, the World Bank in collaboration with the Government of Kenya and other partners such as FCDO, SIDA, UNICEF among others have co-financed 42 projects worth an approximated $ 6,984,825,000. Out of this financial investment, World Bank's commitment amount to $ 5,043,850,000 which is equivalent to 72% of the entire project portfolio. A majority (66%) of this amount projects have been financed through concessional loans, followed by grants at 17%.

55% (n=23) of these projects refer to climate change, while 45% of them do not mention climate change in their design. Reference to climate change ranges from the acknowledgement of the role of climate change in aggravating people's vulnerability to climate-related hazards to programs designed to address such risk in varying lengths. As indicated by Figure 2, there exist only a slight increasing trend in the extent to which the Bank makes reference to climate change between 2013 and May 2020.

Figure 3: *Number of WB Projects mentioning climate change in their design over time*



Source: Source: Based on data from diverse project documents on World Bank's Project in Kenya https://www.worldbank.org/en/region/afr/projects/all

Of the 55% of the projects referring to climate change in their project design, only one and two projects make explicit reference to the country's National Adaptation Plan (NAP) and National Climate Change Action Plan (NCAAP) respectively. Yet, from a sectoral perspective, these projects are aligned with National Adaptation Plan and the National Climate Change Action Plan 2018-2022. This could be attributed to the fact that climate change is extensively addressed in the Kenya-World Bank Partnership Strategy paper, 2014-2018 (The World Bank, 2014) where the bank acknowledges the high vulnerability of the country to the adverse impacts of climate change. Indeed, part of the Bank's projected outcomes during this engagement period is "improved capacity to manage risks from climate change" (ibid:24) through diverse interventions. The extensive reference to climate change in Kenya- World Bank Partnership Strategy paper, 2014-2018 (World Bank, 2014) could explain the fact that Interviews with Government officers reiterated that climate change adaptation remains Kenya's priority and that extensive stakeholder engagement has seen external actors adjusting to focus more on financing climate change adaptation interventions that have mitigation co-benefits rather than overly focusing on climate change mitigation. This is well reflected in the below statement by the World Bank's Representative,

> *"Kenya has a good* National Climate Change Action Plan (*NCCAP) which touches on the big four agenda. The document highlights the need to address adaptation and mitigation in all the development... Some teams do conceive action plan and match it with the NCAAP while other teams don't, but the agenda converges very well...at the World Bank, adaptation did lag mitigation at some point but there have been recent commitments that at least 50% of climate co-benefits would come from adaptation"* (Interview with World Bank Representative, 7th May 2021)

3.2.3 Actual World Bank climate adaptation (and mitigation) mitigation finance flows in Kenya between 2013 and May 2020

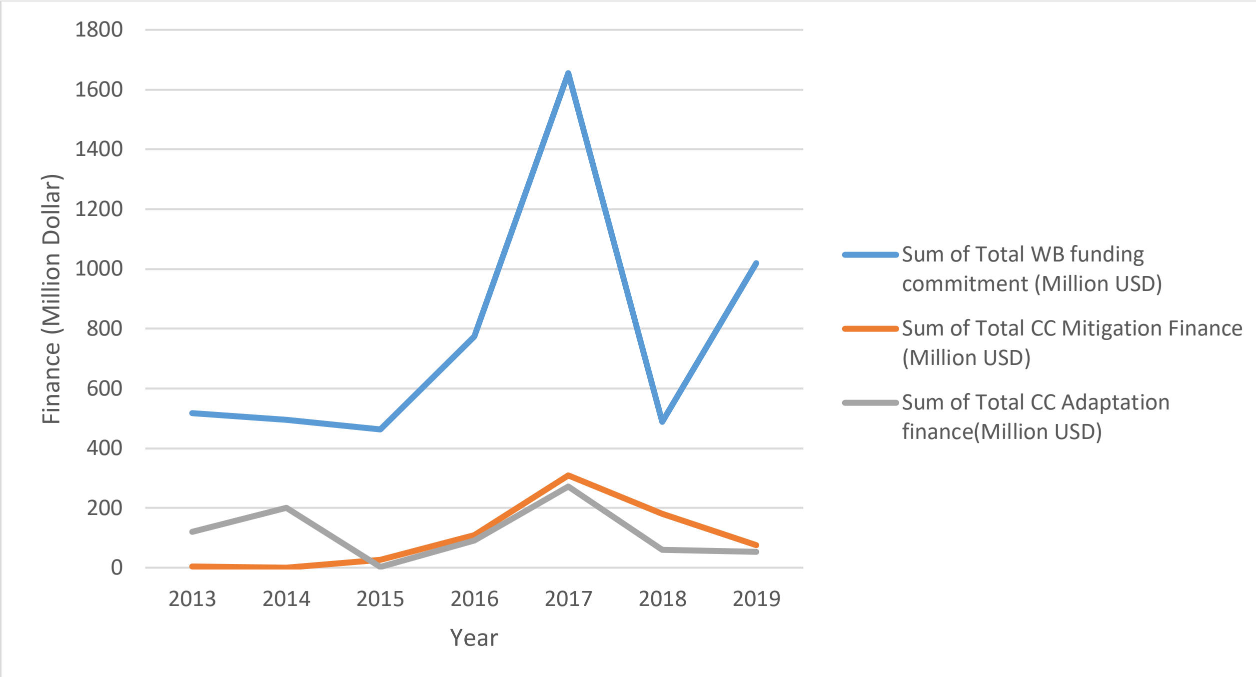
The World Bank has made notable efforts to break down its climate change adaptation and mitigation finance flows in Kenya. This desegregated data is available in the Bank's project documents in its online archive (https://www.worldbank.org/en/region/afr/projects/all) According to the World Bank's Official, these efforts involve both the project design teams, and the specialized unit in the bank that makes the decision on actual proportions of the project design to be dedicated to climate co-benefits. As earlier discussed, many government officers stated that the level of engagement in such process ought to be further opened up towards more involvement and capacity building of government experts.

As earlier seen, 23 of the 42 projects financed by the World Bank in Kenya between 2013 and 2019 refers to climate change. Based on this reference, we considered these projects as climate change sensitive and undertook a further assessment on them. We found out that 18 (78%) of these projects contain finance data desegregated based on climate change adaptation and mitigation. The amount of climate finance in these projects amount to $ 1,500,825,500, which is equivalent to 27% entire WB funding portfolio in Kenya between 2013 and May 2020 (See Annex 4 for further details on the nature of the projects).

Based on our analysis, climate change adaptation finance occupies the larger proportion of the World Bank's climate finance at 16% while mitigation finance follows closely at 14% (See Annex 4). Findings from the analysis of World Bank's project documents in Kenya, therefore, support the assertion by both the government officers and the World Bank representative that there has been a concerted effort by both actors to focus more finance towards climate change adaptation which is currently the main climate change concern for the people of Kenya. Yet, trend analysis over the period 2013 and 2019 suggest a slight declining trajectory for adaptation finance as compared to a growth trajectory for mitigation finance. This implies that ongoing efforts by the World Bank and the Government of Kenya to enhance climate change adaptation must be sustained towards addressing Kenya's vulnerability to adverse impacts of climate change.

Figure 4:*World Banks's Climate Finance trajectories between 2013 and 2019*

Year	Sum of Total WB funding commitment (Million USD)	Sum of Total CC Mitigation Finance (Million USD)	Sum of Total CC Adaptation finance(Million USD)
2013	517.5	4.39	121.09
2014	495.34	0	200
2015	462.66	27.01	2.45
2016	773.09	108.64	90
2017	1655.1	308.81	271.66
2018	488.18	180	60
2019	1019.48	74.7	52
Grand Total	**5411.35**	**703.55**	**797.2**



Source: Based on data from diverse project documents on World Bank's Project in Kenya https://www.worldbank.org/en/region/afr/projects/all

AfDB Finance in Kenya 2013 and 2020

3.2.4 Overall AfDB Finance in Kenya between 2013 and 2019

During the period 2013-2019, the AfDB together with the Government of Kenya and other partners have financed a diverse portfolio of 33 projects amounting to $ 4,461,216,857.[3] The AfDB's commitment amounts to US$ 2,997,637,846 which is equivalent to 67% of the entire projects portfolio. 87% of the funding has been advanced as concessional loans, indicating that, like with the World Bank, concessional loans remain the key financing instruments deployed by MDBs to finance Kenya's development needs. In addition, the AfDB-led financing attracted co-finance amounting $ 2,176,194,520 for which the Government of Kenya's contribution is 24% ($ 520,021,971). The projects are typically large, each targeting to benefit a large number of people. As shown in figure 5, considering the period 2013-2019, the Bank's investment in Kenya is on an upward trajectory. Although it is noted that the AfDB has enhanced its funding to private sector actors in the recent past (Simpasa et al., 2015), the Government of Kenya remains the Bank's key

[3] For the period 2013-2019, the African Development Bank has financed 34 projects in Kenya.[3] One Project (Kenya - Jomo Kenyatta International Airport Airfield Expansion Project - 2nd Runway Development) has been cancelled and therefore not considered for analysis. Eleven projects (32%, which are mainly financial sector oriented) lack key financial details and are therefore, other than to obtain the overall finance by the AfDB in Kenya, these projects have also not been considered for analysis.

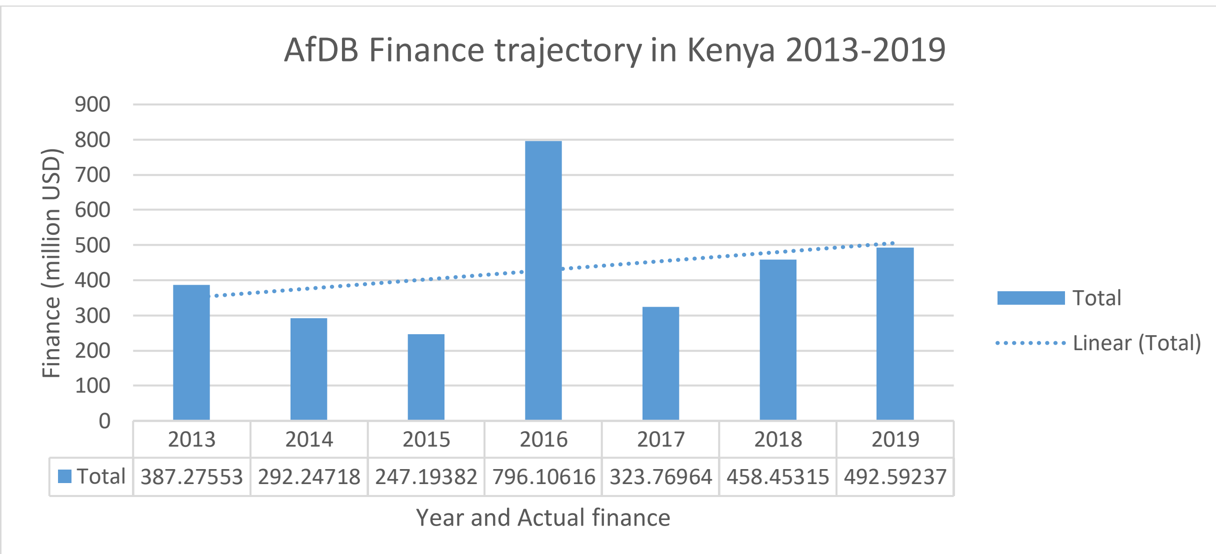
client in Kenya both with regards to the number of projects and amount of funds accessed as shown in the table below.

Table 1: *Typology of AfDB clients in Kenya*

Type of borrower	Number of projects	Fund size (million $)
Government of Kenya(sovereign)	**19 (59%)**	**2,175.8 (73%)**
Private Sector (non- sovereign)	**13(41%)**	**820.8 (27%)**
	32 (100%)	**2997.6 (100%)**

Source: Source: Based on data from diverse project documents on Africa Development Bank's (AfDB) project in Kenya https://projectsportal.afdb.org/dataportal/VProject/search

Figure 5:*AfDB Finance trajectory in Kenya 2013-2019*



Source: Based on data from diverse project documents on Africa Development Bank's (AfDB) project in Kenya https://projectsportal.afdb.org/dataportal/VProject/search

3.2.5 AfDB approach to Climate finance

Like the World Bank, the AfDB acknowledges the potential for climate change to disrupt years of development investments in Africa, as well as the high climate change vulnerability facing the continent. The bank has, therefore, instituted several measures aimed at mainstreaming climate change adaptation and mitigation in its development projects which are generally geared towards poverty eradication in the African continent. These measures are based on the Bank's Risk and Adaptation Strategy (2009), which among others require that the bank's projects be screened for climate change and that climate risk is integrated into AfDB Country Strategy Papers.

The bank also undertakes an elaborate, extensively participatory process of development of its Country Strategy Papers towards an understanding of in-country development priorities, socioeconomic dynamics and trends as well their vulnerability to adverse impacts of climate change (Interview with AfDB Officer A, 17th February 2021). Overall, the bank's approach to climate change adaptation (and mitigation) is one that mainstreams climate concerns within developmental plans as stated by Bank's officer below:

> *"At the AfDB we do not have climate change projects. What we have instead are development projects. We however make sure that we mainstream climate change in our development projects to ensure that climate change concerns are fully integrated with our development projects" (Interview with AfDB representative A, 17th February 2021, paraphrased)*

Towards this end, the bank undertakes a comprehensive climate risk screening as a way of raising awareness on climate change, enhancing climate change knowledge and mainstreaming in project design. The process is guided by an elaborate system that allows for the project-specific appraisal, climate risk ranking and the development of project-specific adaptation measures (Figure 4).

Figure 6: *AfDB climate change screening process*

Source: *Rwabizambuga* (2012)

3.2.6 Climate change integration in AfDB financed development projects in Kenya

A digital examination of AfDB project documents reveals that a majority (87%) of the Bank's projects refer to climate change in relevant ways. This implies that the Bank significantly considers climate change in the design of its projects, something emphasized by the AfDB officers during interviews. This contention can be further confirmed by the fact that a majority (65%) of projects supported by the Bank from 2013 to 2019 have also been screened for climate change risks, after which specific climate change risk mitigation measures are proposed. Like it is the case with World Bank financing, only a few projects refer to the National Adaptation Plan and the

National Climate Change Action Plan. However, the issues that the various projects propose to address overwhelmingly relate to the objectives of the NAP and the NCCAP.

In addition, the Bank's Country Strategy Paper for Kenya (African Development Bank (AfDB), 2019) recognizes Kenya's susceptibility to the adverse impacts of climate change based on internal technical assessments as well as other studies. The paper also acknowledges Kenya's elaborate climate change policy and legislative framework with which the Bank seeks to align itself by financing climate change mitigation and adaptation measures across diverse sectors.

Discussions with the bank's official pointed to a significant engagement with Kenya, climate change policies such as the National Climate Change Action Plan 2018-22. The extent of this involvement is however unclear, like interviews and focus group discussions with the government officers indicated that the government discourage the active involvement of MDBs in its policy formulation process towards promoting the development of nationally owned policies.

3.2.7 AfDB tracking of Adaptation finance

The bulk of the AfDB documents (87%) reviewed for this study are project appraisal documents. These documents contain a detailed assessment of the proposed project covering such aspects as the project rationale, detailed description of project activities, financing arrangement, project feasibility and proposed implementation strategy. A few documents (13%) were short, 2-3 pager project summary documents, which were reviewed in the absence of Project Appraisal documents.

A review of these documents indicates that the AfDB has not disaggregated climate finance data from the overall financing. This contrasts with the World Bank project appraisal documentation, where a significant number of project appraisal documents explicitly disaggregate climate finance data from the development finance. Bank officials (Officer 1 and 2) confirm this gap although there are varied explanations as captured below:

> *"Internally we now have climate finance tracking where we can unpack activities into small units and can establish the amount of financial resources going into climate change mitigation and adaptation manually or by estimates from the Bank's perspective. This is important because different countries have different approaches to defining their climate finance. Kenya for instance may consider the climate finance component in an AfDB loan as domestic climate finance by the virtue of the fact that the loan will be repaid. The challenge with that is that in the event AfDB reported that as climate finance, which would result in double-counting" (Interview with Bank Officer -1, 17th February, paraphrased)*

> *"Many MDBs have started mainstreaming climate change into development finance only recently. Within AfDB, it has been noted that this aspect (of disaggregated climate finance data) is missing, and the management is working to improve on this." (Interview with Bank Officer 2, paraphrased)*

These views point to methodological challenges earlier mentioned that limit consensus-wide data on climate adaptation finance (Donner et al., 2016; UNEP, 2016), and which MDBs continue to strive to address through joint methodologies(African Development Bank (AfDB) et al., 2020; BIR-1, BIR-2). For Bank Officer 1, determining the adaptation component of a project during the project design stages is the more important task as it directly speaks to efforts to cushion projects from adverse impacts of climate change and addressing adaption needs of populations that are associated with the projects whether they are hard (infrastructural) or soft (e.g. livelihoods) oriented.

As reflected in the statements below, the officers underscored that climate change adaptation remains a priority climate change investment in the Banks operation. This assertion is reflected in the 2020 MDBs climate finance report that indicates that out of the seven MDBs reporting on their climate finance, the AfDB is the only Bank with climate change adaptation finance amount that exceeds mitigation finance (Cf, Figure 6).

> *"But whatever projects we are given, our job is that we make sure, there is an element of climate change involved in it, now as a bank, we have a natural inclination towards adaptation(…), for us, Adaptation is a priority, mitigation is an opportunity." Interview with Bank Officer -1, 17th February, paraphrased)*

Figure 7: *Global landscape: MDBs climate Finance in 2019*

	For low-income and middle-income economies			For high-income economies			Total climate finance		
MDB	Adaptation finance	Mitigation finance	MDB climate finance	Adaptation finance	Mitigation finance	MDB climate finance	Adaptation finance	Mitigation finance	MDB climate finance
AfDB	2,016	1,584	3,600	–	–	–	2,016	1,584	3,600
ADB	1,531	5,537	7,068	5	–	5	1,536	5,537	7,073
EBRD	569	3,354	3,923	13	1,066	1,079	582	4,420	5,002
EIB	387	3,170	3,558	584	17,517	18,100	971	20,687	21,658
IDBG	1,887	2,531	4,417	31	509	540	1,918	3,040	4,958
IsDB	217	247	464	1	1	2	218	248	466
WBG	7,329	11,108	18,437	368	1	369	7,697	11,109	18,806
Total	**13,936**	**27,532**	**41,467**	**1,001**	**19,094**	**20,095**	**14,937**	**46,625**	**61,562**

Source: *African Development Bank (AfDB) et al., 2020)*

4. Gender Mainstreaming

Kenya's climate change institutional framework considers gender as a critical component towards successful climate change adaptation and mitigation efforts (GoK, 2016). This is because women, men, children and youth are affected differently by climate change. Women, particularly in the rural and arid and semi-arid regions are more affected by the adverse impacts of climate change due to historical and cultural practices that suppress their agency. They are, for instance, restricted by diverse customary practices from undertaking critical decisions that affect the socio-economic configuration of the household and society as men are considered the head of the family/society. Women are also expected to undertake a majority of household chores such as fetching water and gathering firewood – natural resources that have been and continue to be adversely affected by climate change. Yet, due to their role as users and custodians of natural resources, women have also been recognized as key agents in addressing challenges emanating from climate change (GoK, 2016; UNFCCC, 2019)

At 69% and 78% respectively, a majority of the World Bank's and AfDB projects in Kenya consider gender in the program design. This indicates that the MDBs are cognizant of the gender-differentiated impacts of climate change as well as the opportunities available for women to contribute to addressing challenges resulting from climate change in Kenya. Integration of gender considerations in the project design varies in breadth from a requirement for gender-disaggregated data from project reports to activities that specifically empower women through their active involvement in project implementation processes, particularly through income generation initiatives.

5. Discussion and conclusion

Both World Bank and Africa Development Bank play a pivotal role in financing Kenya's development actions. The banks have made notable progress in incorporating climate change considerations in their financing arrangements. This is based on an understanding of climate change as an integral part of the development process. To varying extents, climate change integration has been done through the implementation of projects in Kenya that seek to mitigate the impacts of climate change or support communities to adapt to adverse impacts of climate change or reduce the impacts of climate change on development projects.

Although some gaps exist, data from the World Bank gives an idea of the actual amount of designated and development orientated climate finance. In this regard, climate change adaptation has attracted slightly more financing as compared to mitigation finance. This finding is not isolated because even though the AfDB does not publicly avail project level, disaggregated data on climate finance, interviews with bank officers underscore that the bank prioritizes climate change adaptation over mitigation as this remains the priority for the African continent. Published records for the bank's overall climate finance in 2019 also indicate that climate change adaptation has attracted more finance than climate change mitigation even though mitigation finance is on a growth trend. These findings indicate that concerted efforts by the Kenyan government to institutionalize climate change adaptation as a priority for the country could be bearing reward.

Concerning gender, the available data notes that both banks (World Bank and AfDB) have made significant efforts to integrate gender consideration in their finance arrangements. These efforts range from the inclusion of men, women and youth in training, but as well the implementation of project components that seek to empower women based on historic marginalization.

There exist challenges in the development of homogeneous adaptation estimation methodologies, but the banks appear to be continually aiming at streamlining these. Other challenges include gaps between ministries that are core to climate change adaptation financing, growing external debt and the continued perception of adaptation projects as having poor bankability. These are being addressed to varying extents for instance through staff secondment to the ministries, mobilizing private sector actors and supporting research and development. One of the barriers to climate change mainstreaming has been the gap between the Ministry of Environment and Forestry, which is responsible for coordinating climate change actions, and the National Treasury and Planning, which is responsible for planning and financing (Interview with Bank Officer 1 17th February 2021, Interview with Government officer, 5th July 2021). Other ministries such as the Ministry of Agriculture, Energy, Transport are also critical, as they drive the sector-specific adaptation needs. Indeed, the Climate Change Directorate has ensured that all government ministries have established Climate Change Units to enhance coordination on climate change actions. Yet, some observe that these ministries are yet to fully work in a coordinated manner (Interview with Bank Officer 1 17th February 2021, Interview with Government officer, 5th July 2021). The implication here is that the Climate Change Directorate, which is the Ministry of Environment Directorate responsible for climate change in the country needs to do more to enhance a coordinated approach, particularly with the Ministry of Finance which coordinates the country's development planning with internal and external actors.

These challenges could be addressed through enhanced cooperation among MBDs in the execution of climate finance tracking and reporting methodologies in line with their 2015 commitment to the five Voluntary Principles for Mainstreaming Climate Action in Financial Institutions. Enhanced capacity building and more active engagement of stakeholders in the design of climate-sensitive projects and programs could promote an enhanced mainstreaming of climate adaptation finance in the design and implementation of MDB financed programs in the country. There also exist opportunities for MDBs to deploy innovative staffing arrangements such as seconding expert technical teams to support the government in driving climate change mainstreaming. To reduce the divergence in approaches to planning and actualizing climate change adaptation plans and promote national tracking and reporting of climate change, the Climate Finance Unit of the National Treasury and the Climate Change Directorate need to enhance partners coordination and reporting not just among National and County government departments but also including civil society and private sector actors as these are an important player as well.

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7 Annexes

1. List of GoK FGD participants
2. List of civil society FGD Participants
3. AFDB Interview participants
4. Summary of World Bank’s Projects in Kenya 2013-2019
5. Summary of AfDB’s Projects in Kenya 2013-2019

World Bank Projects in Kenya 2013-May 2020 Climate Finance considerations													
									Designated Climate Finance (million USD)		Development Finance (million USD)		
Year of funding commitment	**S.N**	**Project end date**	**Project Title**	**Total Project Cost (Million USD)**	**Total Funding Commitment by WB (million USD)**	**Funding type**	**Total Co-financing**	**Gok Cofinance**	**Adaptation**	**Mitigation**	**Adaptation**	**Mitigation**	**Climate Finance (%)**
2013	1	December, 2026	Kenya Health Sector Support Project - Additional Financing	61.00	41.00	Credit and Grant	20.00	0.00			-	-	
	2	December, 2016	Additional Financing for Cash Transfers for Orphans and Vulnerable Children	66.40	10.00	Credit	56.40	0.00			-	-	
	3	June, 2020	National Safety Net Program for Results	952.00	250.00	Credit	702.68	411.23			-	-	
	4	December, 2022	Kenya Water Security and Climate Resilience Project	249.67	216.50	Credit	25.81	13.46			121.09	4.39	58%
SUB TOTAL				**1329.07**	**517.50**		**804.89**	**424.69**	**0**	**0**	**121.09**	**4.39**	
2014	5	Dec-21	Coastal Region Water Security and Climate Resilience Project	200.00	200.00	Credit	0.00	0.00			200.00	-	100%
	6	May-20	Kenya Urban Water and Sanitation OBA Fund for Low Income Areas	18.135	11.84	Grant	6.30	6.30			-	-	
	7	Jun-21	Kenya Petroleum Technical Assistance Project (KEPTAP)	66.00	50.00	Credit	16.00	0.00			-	-	
	8	December, 2016	Kenya Transparency and Infrastructure Project Additional Financing 2	30.00	30.00	Credit	0.00	0.00			-	-	
	9	December, 2018	Transport Sector Support Project - Additional Financing	267.20	203.50	Credit	63.70	63.70			-	-	
SUB TOTAL				**581.34**	**495.34**		**86.00**	**70.00**	**0**	**0**	**200.00**	**-**	
2015	10	December, 2020	Kenya Statistics Program for Results	138.40	50.00	Credit	88.40	85.40			-	-	
	11	no detail	CF Kengen; Sondu Miriu; Kipevu	17.06	17.06	Grant	0.00	0.00		17.06	-	-	100%
	12	no detail	Kenya Informal Settlements Improvement Projects - Additional financing	8.30	8.30	Grant	0.00	0.00			-	-	
	13	Jun-20	Kenya Climate Venture Facility	4.90	4.90	Grant	0.00	0.00	2.45	2.45	-	-	100%
	14	December, 2021	Kenya GPE Primary Education Development Project	88.40	88.40	Grant	0.00	0.00			-	-	
	15	Jul-20	Financial Sector Support Project.	37.00	37.00	Credit	0.00	0.00			-	-	
	16	December, 2021	KE Electricity Modernization Project	762.00	257.00	Credit and Grant	512.00	4.50		7.5	-	-	3%
SUB TOTAL				**1056.06**	**462.66**		**600.40**	**89.90**	**2.45**	**27.01**	-	-	
2016	17	Dec-21	National Agricultural and Rural Inclusive Growth Project	219.00	200.00	Credit	19.00	19.00			90.00	36.00	63%
	18	Dec-18	Digital Entrepreneurship Kenya	0.45	0.45	Grant	0.00	0.00			-	-	

	19	Sep-21	Transforming Health Systems for Universal Care	191.10	150.00	Credit and Grant	41.10	0.00			-	-	
	20	Dec-17	Additional Financing: Kenya Electricity Expansion Project	71.00	68.00	Credit and Grant	3.00	0.00		68.00	-	-	100
	21	June, 2021	Kenya Youth Employment and Opportunities	150	150.00	Credit	0.00	0.00			-	-	
	22	Dec-20	Kenya Devolution Support Project	287.30	200.00	Credit	87.30	87.30					
	23	June, 2025	Promoting Biogas as Sustainable Clean Cooking Fuel for Rural Households in Kenya	4.64	4.64	Grant	0.00			4.64	-	-	100%
SUB TOTAL				**923.49**	**773.09**		**150.40**	**106.30**	**0.00**	**72.64**	**90.00**	**36.00**	
2017	24	Dec-23	Kenya Secondary Education Quality Improvement Project	200.00	200.00	Credit	0.00	0.00			-	-	
	25	Dec-22	Program to Strengthen Governance for Enabling Service Delivery	246.00	150.00	Credit	86.00	86.00			-	-	
	26	Mar-20	Case Study on Integrated Delivery of selected non-communicable Diseases	2.5	2.50	Grant	0.00	0.00			-	-	
	27	no details	Nairobi Sanitation OBA project II	5.40	2.60	Grant	2.80				-	-	
	28	Jan-00	Kenya Urban Support Program	320.00	300.00	Credit	20.00	20.00			69.16	24.75	31%
	29	Jun-23	Off-grid solar access project for underserved counties	150.00	150.00	Credit	0.00	0.00			-	126.56	84%
	30	Oct-25	Kenya Solar Lighting program	5.00			0.00				-	5.00	100%
	31	Oct-22	Kenya Infrastructure Finance Public Private Partnership Additional Financing Project	50.00	50.00	Credit	0.00	0.00			-	-	0%
	32	Mar-18	Additional Financing for the National Safety Net Program for Results	952.68	250.00	Credit	261.34	411.00				-	
	33	Oct-22	Water and Sanitation Development Project	330.00	300.00	Credit	30.00	30.00			52.50	52.50	35%
	34	Feb-22	Kenya Climate Smart Agriculture Project	279.70	250.00	Credit	29.70	29.70	**150**	**100**	-	-	100%
SUB TOTAL				**2541.28**	**1655.10**		**429.84**	**576.70**	**150**	**100**	**121.66**	**208.81**	
2018	35	Dec-23	Kenya Social and Economic inclusion project	343.00	250.00	Credit	93.00	0.00			60.00	-	24.00%
	36	no details	Kenya development response to displacement impacts - additional financing: resettlement policy framework	8.18	8.18	Grant	0.00	0.00			-	-	
	37	Dec-24	Kenya Industry and Entrepreneurship	50.00	50.00	Credit	0.00	0.00			-	-	
	38	Mar-21	KenGen Guarantee Program	300.00	180.00	Guarantee	0.00	0.00		180	-		100%
SUB TOTAL				**701.18**	**488.18**		**93.00**	**0.00**	**0**	**180**	**60.00**	**-**	
2019	39	no details	Kenya GPE Primary Education Development - additional financing	9.48	9.48	Grant	0.00	0.00			-	-	

	41	Jun-20	Inclusive Growth and Fiscal Management Development Policy Finance	750.00	750.00	Grant	0.00	0.00	52.07	52.07	-	-	13.89%
	41	no details	KTDA small hydro programme of activities	10	10.00	Grant	0.00	0.00		10.00	-	-	100.00 %
	42	Jun-24	Kenya affordable housing finance project	262.00	250.00	Loan	12.00			12.63	-	-	5.05%
SUB TOTAL				**1031.48**	**1019.48**		**12.00**	**0.00**	**52.07**	**74.7**	**-**	**-**	
GRAND TOTAL				**6984.84**	**5043.85**		**2,176.53**	**1,267.59**	**204.52**	**454.35**	**592.75**	**249.20**	
									16%	**14%**			
Percentage					**72%**			**4%**	**9%**	**12%**	**10.7%**	**5%**	**30.0%**