



National Environment Management Authority

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NOTICE TO THE PUBLIC TO SUBMIT COMMENTS ON AN ENVIRONMENTAL IMPACT ASSESSMENT PROJECT REPORT FOR THE PROPOSED NATIONAL PERFORMANCE TRIALS (NPTS) ON BT-COTTON AT NINE ON STATION SITES (MWEA, KATUMANI, KAMPI YA MAWE, BURA, PERKERRA, KIBOS, ALUPE, BARWESSA AND MATUGA IN KIRINYAGA, MACHAKOS, MAKUENI, TANA RIVER, KISUMU, BUSIA, BARINGO AND KWALE COUNTIES

Pursuant to Regulation 21 of the Environmental Management and Coordination (Impact Assessment and Audit) Regulations, 2003, the National Environment and Management Authority (NEMA) has received an Environmental Impact Assessment Study Report for the above proposed project.

The proponent, Kenya Agricultural and Livestock Research Organization, is proposing to undertake National Performance Trials (NPTS) for Insect Resistant (Bollgard II) Cotton commonly referred to as Bt-Cotton at Mwea, Katumani, Kampi ya Mawe, Bura, Perkerra, Kibos, Alupe, Kerio Valley (Barwessa) and Matuga.

The following are the anticipated impacts and proposed mitigation measures:

Impacts	Proposed mitigation measures
Soil Erosion	<ul style="list-style-type: none"> No excavations will be carried out in the NPT fields, except ploughing. Use of recommended agronomic and soil fertility maintenance measures will help in controlling soil erosion.
Permanent or temporary change in land use, land cover or topography	<ul style="list-style-type: none"> No construction of buildings or excavations will be carried out at the sites which may change the topography of land. No new land will be opened as the National Performance Trials will be carried out in the existing agricultural fields.
Change in Soil Properties	<ul style="list-style-type: none"> The soil if not managed well can change in soil properties leading to low productivity. However proper management will enhance soil quality and increase productivity. Soil Sampling and analysis prior to project commencement is necessary. Use of recommended fertilizer inputs will avoid soil degradation. Efficient irrigation practices will be deployed to avoid waterlogging and salinization.
Biodiversity conservation (Flora and Fauna) Gene Flow	<ul style="list-style-type: none"> Time and/or distance isolation from other cotton or related crops shall be maintained to restrict genetic escape. A buffer zone shall also be provided between the Bt cotton NPTs and other cotton fields, if any. The proponent shall ensure proper disposal of plant materials at the end of the project to avoid pilferage.
Crop Production	<ul style="list-style-type: none"> Bollworm is a challenge to cotton production. This project will boost production hence income generation by availing insect-pest resistant seed which when approved will be available to farmers through seed companies.
Livestock Production	<ul style="list-style-type: none"> No livestock grazing fields will be opened up for the NPT trials.
Water quality of the river or near water bodies	<ul style="list-style-type: none"> None of the proposed fields is located on riparian land or near water bodies where rainwater off site could flow residual pesticides and fertilizer-nutrients into.
Infrastructure	<ul style="list-style-type: none"> Minimal infrastructure e.g. infield irrigation canals will be constructed in some trial sites to supplement rainfed farming. An appropriate design of the irrigation system will be done to avoid any negative impact.
Sediment Loads	<ul style="list-style-type: none"> Where supplemental irrigation will be carried out, appropriate irrigation structure will be erected to minimize sediment loads. Equally no sediment loads will leave the fields unless excessive flooding occurs.
Malaria and other waterborne diseases	<ul style="list-style-type: none"> No construction works are involved thus no excavations that may enable stagnation of water. Existing farm fields shall be used.
Pollution - air and dust	<ul style="list-style-type: none"> Initial land preparation during the dry season may lead to minor dust pollution due to ploughing. However, ploughing will be done when the soil moisture is conducive to the operation. In subsequent farm operations, there would be minimal air pollution due to strict adherence to Air Quality Regulations, 2014.
Alcohol and Substance Abuse	<ul style="list-style-type: none"> Except during planting and weeding where extra personnel will be required, the NPTs will only provide minimal employment per site. This will not promote alcohol and substance abuse. Project will communicate to its employees and transients the "zero tolerance" policy to enforce to the fullest extent all applicable policies on alcohol and substance abuse.
Human-wildlife conflict	<ul style="list-style-type: none"> Night and day watchmen will be hired to watch and prevent incursions by wildlife in Bura and Perkerra.
Waste disposal (generation, collection and disposal)	<ul style="list-style-type: none"> At the NPT plots set up phase, no bushes or tree stumps will be generated since the land is currently under agricultural use. During operation, agrochemical and fertilizers bags may be generated. However the project will put in place appropriate waste management plans. At harvest time, KEPHIS will provide appropriate measures for the disposal of stalks, seed and lint.
HIV and AIDS	<ul style="list-style-type: none"> Few staff will be engaged in the project. However the project management as part of its occupational safety and health program, will promote awareness of its employees about the risk and prevention of HIV/AIDS and voluntary use of preventive measures i.e. condoms will be availed in wash rooms.
Security	<ul style="list-style-type: none"> Introduction of NPT on Bt-Cotton could attract incidences of vandalism/invasion from anti-GMO activists although during the 10 years of CFT no such an incidence has ever been recorded in Kenya. The proponent will employ preventive mechanisms and stakeholder involvement in safeguarding the NPTs. Data may be lost through livestock grazing on the crop. The Centers will provide security to the NPT sites since results will be required at the end of the project.
Social Welfare	<ul style="list-style-type: none"> There will be minimal effect on social welfare as the NPTs will only last for a maximum of two seasons attracting minimal employment opportunities. However, local community will be given priority when hiring unskilled labour without discrimination, corruption or sex exploitation or harassment as per the laid down KALRO Codes of Conduct Policies. To Increase awareness about Bt-Cotton, the sites will be open to the public at times agreeable with the centre management.
Occupational Health and Safety	<ul style="list-style-type: none"> KEPHIS shall provide guidelines on product handling and management. All workers on the project will be sensitized on occupational health and safety aspects and supplied with appropriate working attire e.g. masks, gloves, gum boots and first aid kits. Varieties safety shall be well labelled to ensure no mix up of treatments. Comply with the provisions of OSHA 2007.

The full report of the proposed project is available for inspection during working hours at:

- The Principal Secretary
Ministry of Environment and Natural Resources,
NHIF Building, 12th Floor,
Ragati Road, Upper Hill,
P.O. Box 30126-00100,
NAIROBI
- Director General
Popo Road, off Mombasa Road
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NAIROBI
- County Director of Environment
KIRINYAGA COUNTY
- County Director of Environment
MACHAKOS COUNTY
- County Director of Environment
MAKUENI COUNTY
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- County Director of Environment
BARINGO COUNTY
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BUSIA COUNTY
- County Director of Environment
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- County Director of Environment
KWALE COUNTY

A copy of the EIA report can be downloaded at www.nema.go.ke

NEMA invites members of the public to submit oral or written comments within thirty (30) days from the date of publication of this notice to the Director General, NEMA, to assist the Authority in the decision-making process for this project. Kindly quote ref. no. NEMA/PR/5/2/18571

Comments can also be e-mailed to dgnema@nema.go.ke

DIRECTOR GENERAL

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