



**REPUBLIC OF KENYA**

**MINISTRY OF ENVIRONMENT, CLIMATE CHANGE AND FORESTRY  
STATE DEPARTMENT FOR ENVIRONMENT AND CLIMATE  
CHANGE**

**WORKSHOP REPORT ON THE INTEGRATED STOCKHOLM  
CONVENTION ON PERSISTENT ORGANIC POLLUTANTS  
REPORTING TOOLKIT TESTING**



**MARCH 2023**

## 1.0 Background

Kenya is a Party to the Stockholm Convention on persistent organic pollutants and is therefore obliged to comply with the reporting obligations under Article 7 (National Implementation Plans) and Article 15 (National Reporting). These articles require parties to submit national implementation plans (NIP) and National Reports to the Secretariat within the terms specified in the text of the convention and within the set timelines. The National Implementation Plans (NIPs) and the National Reports submitted to the Stockholm Convention Secretariat are the key data sources used in the evaluation of the effectiveness of the implementation of the Stockholm Convention for Parties and to set objectives for the protection of human health and the environment from persistent organic pollutants (POPs).

Parties are required to update their National Implementation plans under Article 7 to address newly listed POPs. The fourth, fifth, sixth and eighth conference of parties (COPs) agreed to list an additional 17 chemicals to the convention which was a trigger for parties to update their NIPs. However, many Parties including Kenya have not updated and transmitted their NIPs to the Secretariat. This has in turn resulted to a challenge in undertaking evaluation of the implementation of the Stockholm Convention due to the limited data from National Reports and National Implementation Plans. The main reason for the low reporting under articles 7 and 15 of the Stockholm Convention is the low level of technical capacity to collect the reporting data and the complexity of the reporting structure. It is for this reason that UNEP developed the Integrated SC reporting Toolkit Project whose objective is to facilitate the development, transmission, access and use of data contained in National Implementation Plans and National Reports.

## 2.0 Introduction

Kenya is one of pilot countries of the GEF-funded project “Integrated SC toolkit to improve the transmission of information under Articles 07 and 15” (GEF ID 9884). The objective of the project is to facilitate the development, transmission, access and use of data contained in National Implementation Plans (NIP, Article 7) and National Reports (Article 15)

In this context, a small-scale funding agreement (SSFA) was signed between UNEP/Chemicals and Health Branch and Government of Kenya to conduct the following activities;

1. Update/revise the national gap analysis to assess the quality and completeness of the National Implementation Plan (s) and national reports;
2. Hold a national workshop to introduce stakeholders to the project and invite them to participate in project activities;
3. Undertake the revision/collection of POPs data to be used for testing the integrated toolkit;
4. Test the integrated SC toolkit with the collected POPs data

This project was undertaken in Kenya from January 2022 to April 2023.

According to the Activity 2 of the SSFA, the Government of Kenya had to organize a national stakeholders workshop and forums which covered the following activities:

- ✓ Training on the Reporting requirement Kenya
- ✓ Identifying Kenya’s reporting Gaps
- ✓ Training on electronic reporting
- ✓ Testing on the Reporting Toolkit
- ✓ Developing an Institutional framework on reporting
- ✓ Hold a national Workshop for the SSFA

## 3.0 Purpose and objective of the workshop

The purpose of the workshop was to launch the national activities to be performed for POPs data revision/collection and the integrated articles 7 and 15 electronic toolkit testing.

The main objective of the workshop was to provide participants with knowledge and skills on how to test the Reporting Toolkit.

Specifically, the workshop aimed to achieve the following objectives:

- Reviewing of the Gap analysis report
- Training POPs data training materials
- Familiarize participants with the electronic toolkit software and its components.
- Introduce participants to the various testing techniques and methodologies used in software testing.
- Examine the design and execute test cases for the toolkit.
- Enhance participants' skills in using automated testing tools.

### 3.1 Opening of the Workshop

The Workshop was held at the Morendat Kenya Pipeline Company Institute of Oil and gas on 26-31st March 2023. The programme for the workshop is Annex 1.

### 3.2 Remarks from the Ministry of environment Climate Change and Forestry

The Director, Multilateral Environmental Agreements Department, Mr. Cyrus Mageria, welcomed the stakeholders and thanked them for taking the time to attend the meeting. The Director emphasized that there is need to ensure that we meet article 15 of the Stockholm convention where each party to the convention is required to report on statistical data on its total quantities of production, import and export of each chemical listed in Annex A and Annex B or a reasonable estimate. He also noted that since 2014 when the last Nip was done there has been changes and therefore through GEF funding NIP updating will start soon for data the integrated Stockholm reporting toolkit will provide an electronic data submission framework which will be used to submit the data.

Furthermore, He emphasized that the gap analysis report touches on areas where we still have gaps and that every stakeholder should participate in identifying the gaps in Kenya which act as a checklist to gauge what has been done and what is remaining, He wished that the toolkit will not only help Kenya but even other stakeholders will find the platform important when doing the regular chemical reporting.

Also, the Director apologized on behalf of the ministry for delayed allowances and said that the technicalities have been sorted and by mid-April, the allowances would have been paid. He finally wished everyone a wonderful session and a stay in Naivasha.

### 3.3 Participation

The workshop had participation from the Ministries of Environment Climate Change and Forestry, Ministry of Health, National Treasury- Kenya Revenue Authority, National Environment Management Authority Products Board, University of Nairobi Chemistry Department and GMP Control, Masinde Muliro University of Technology, Jomo Kenya University of Technology.

The list of participants is Annex 2.

### 4.0 Project progress brief

Mr. Edward Njuguna in charge of the SSFA toolkit project took the stakeholders through what the project has done since its inception, he emphasized that the project has held four stakeholders' workshops on gap analysis development, and collected data on POPs, Industrial POPs, and pesticides. Also, the project held a virtual training on data collection and integrated toolkit use organized by UNEP Chemicals. The project was to do the following

- a) Update/revise the national gap analysis
  - ✓ The National Implementation Plan (NIP) and the National Reports submitted to the Stockholm Convention Secretariat under Articles 7 and 15 respectively are the key data sources used in the evaluation of the effectiveness of the implementation of the Stockholm Convention, both at global and national level. Effectiveness evaluation process conducted by the Stockholm Convention Secretariat identified that a key challenge in undertaking this evaluation was the limited data available from national reports and NIPs.
  - ✓ Quantitative information on POPs reported by Parties is extremely limited, such that it is not possible to discuss trends. In this sense, the national gap analysis will check the different sources of information and compare the reporting results, including evaluating differences.

The national gap analysis aims to:

- a) check the information included in the national reports submitted to the Stockholm Convention Secretariat, highlighting gaps on POPs quantitative data which was done;
- b) check the information included in the National Implementation Plan(s) submitted to the Stockholm Convention Secretariat, highlighting gaps on POPs quantitative data; 4 of 7 which was also done
- c) highlight the differences between the information included in the national reports and the information presented in the National Implementation Plan(s);
- d) provide recommendations for future streamlining of the data revision/collection process under the national reports and the National Implementation Plan(s), with focus in addressing the identified data gaps which for part of the recommendation of the process.

Following the workshop discussions, the project stakeholders were supposed to come up with:

- ✓ a report on POPs data collected,
- ✓ a report on how the toolkit can be integrated with the existing chemical databases, and
- ✓ a report on the institutional framework for the management of the toolkit.

The data and information will be beneficial to upcoming projects in line with the Stockholm Convention.

It was noted that there are other upcoming projects namely:

- i. Strengthening investment for adoption of alternatives and sustainable management of agrochemicals and Agri plastics in Africa and Latin America through pilots in Kenya and Uruguay which is now a project document and awaiting co-financing documents
- ii. Africa Regional project on POPS in Plastics - in Project Preparation Stage
- iii. NIP Update about to be implemented
- iv. Concept on PFOA extinguishers in development

## 5.0 National Gap Analysis report presentation

Mr. Francis Kihumba took the stakeholders through the gap analysis report and several issues come up which include:

- PCBs provide an important priority for a GEF project concept since the transformers with PCBs need to be removed from use by the end of 2025 and their waste phase out by 2028 hence, the Ministry of Environment, Climate Change and Forest needs to write to the Ministry of Energy and Kenya Power and Lighting company on how they can work together and ensure regulation is put in place on importation of transformers that contain PCB.
- Participants wanted to understand the Standards and guidelines that guide the importation and procurement of transformers. Mr. Albert from KEBS clarified that guidelines are available but they do not exclusively state if PCBs are restricted.
- On the matter of technical assistance from Kenya to other countries, participants agreed that to best determine if Kenya has a gap the best approach will be to map what is available.
- Also, stakeholders agreed on the need to have a summary of organizations/institutions and areas of work incorporated in the toolkit.
- Furthermore, participants agreed that Kenyatta University and Kenya Association of Chemicals be added to the institutions that contributed to the gap analysis report.
- Participants agreed on the agency to deal with the PCB issues and resolved to take action as soon as possible.
- Water Resources Authority (WRA) should start the monitoring of the POPs in water or collaborate with NEMA and Academic institutions since they have the monitoring equipment.
- To conclude on the gap analysis director MEAs reiterated that participants of the multilateral committee on sound chemicals management go through the recommendations against other publications and identify if there is any grey area with gaps that need to be addressed, and
- Participants agreed that the document be put in google document format so that participants can add any input they have on the document before it can be submitted as a final document

## 6.0 Testing the integrated articles 7 and 15 electronic toolkit and exploring the potential linkages with the data management systems available at the national level

On the second day Mr. Edward Njuguna reported that the integrated articles 7 and 15 electronic toolkit software had been presented by UNEP Chemicals and Health Branch and relevant stakeholders trained. The stakeholders were expected to test the toolkit with the collected POPs data following the training. The trained national experts have proceeded in testing the integrated articles 7 and 15 electronic toolkit by populating with data collected.

Participants from multi-sectoral committee were trained on data collection and how to upload information on the integrated Stockholm reporting toolkit, and the following are the training materials that were used, as provided by UNEP Chemicals and Health Branch:

1. [POPs data collection General information](#)
2. [POPs data collection POPs pesticides](#)
3. [POPs data collection PCBs](#)
4. [POPs data collection POP-PBDEs](#)
5. [POPs data collection HBCD](#)
6. [POPs data collection PFOS](#)
7. [POPs data collection PCP](#)
8. [POPs data collection PCNs](#)
9. [POPs data collection SCCPs](#)
10. [POPs data collection HCB](#)
11. [POPs data collection UPOPs](#)
12. [Compilation of Basel Convention waste codes per each POP](#)
13. [HS codes Pops](#)
14. [Correspondence table between Art. 15 Reporting and NIP](#)
15. [Correspondence table source categories and activity rates uPOPs-Hg-CLRTAP-GHG emissions final](#)
16. [List of POPs specific exemptions acceptable purposes](#)
17. [POPs Inventory check list](#)
18. [NIP detailed structure to be used by project countries \(same as in the BRS Toolkit\)](#)



19. [NIP detailed structure to be used by project countries \(same as in the BRS Toolkit\)](#)

## 7.0 Integrated Stockholm reporting toolkit testing

The participants were then divided into groups, and each group was tasked with designing and executing test cases for a specific component of the toolkit software.

Mr. Francis Kihumba the Stockholm Convention Consultant for the Toolkit project divided the work into 3 groups where one group was to handle UPOPs, another group to deal with the industrial POPs and final group to handle the POPs Pesticides section then each group would present what they discussed. The results of their work were fed into the Toolkit.

In order to ensure the project outcomes sustainability, Kenya needs to make the necessary arrangements for the administration the integrated Article 7 and 15 electronic toolkits at the national level after the project ends, by defining the responsible authority(ies)/personnel having access to fill with data, visualize and/or use the data included in the toolkit.

For this purpose, a framework has been developed to address access to the toolkit and access to data.

UNEP had given access to the toolkit and the participants participated in the testing.

The initial start of the toolkit was challenging being often affected by availability and strength of the internet. The completed Word document of the NIP Submission Module of the toolkit was finalized and used for the toolkit testing.

## 8.0 Conclusions

The workshop came up with the following conclusions:

- ✓ Significant progress has been made on the NIP 2007 and NIP 2014 on some the policy and legislation aspects especially for pesticides and for addressing emissions of dioxins and furans from health care waste in particular and sustainable waste management in general.
- ✓ The biggest weakness is keeping quotative and qualitative data on production, import, export, use and tracing stockpiles.

- ✓ Registering for exemptions is a concept not yet understood in terms of its importance and the space it gives to the search for viable alternatives and for the allowed uses and needs to be further addressed.
- ✓ The process of developing the gap analysis and testing the toolkit was beneficial in many ways but the most important is that there are many aspects Kenya has not addressed.
- ✓ Kenya has done commendable work in addressing POPS pesticides as per the Stockholm Convention.
- ✓ Kenya needs to do more on evaluating the alternatives.
- ✓ From the data on environmental monitoring, it is apparent that some of the banned POPs are finding their way into the country illegally perhaps because Kenya is a transit state of countries that have not banned or restricted those POPs.
- ✓ Urgent work needs to be done on industrial POPs and especially PCBs.
- ✓ The alternatives of PCBs being PCN and SCCP requires that these three groups of POPs be addressed together.
- ✓ The project concept on PCBs be completed and sent to GEF as soon as possible.
- ✓ It is apparent that POP-PBDE related compounds are getting attention through the global issue on POPs.
- ✓ All industrial POPs need a comprehensive inventory.
- ✓ The two projects on plastics could be used to do a complete inventory of POP-PBDEs.
- ✓ PFOS and PFOA needs action urgently but is complex because of the so many allowed uses.
- ✓ For UPOPs significant progress was made of health care waste, mainstreaming sound chemicals management into development activities and promoting the concept of BAT and BEP.
- ✓ There is need to access guidelines on BAT and BEP on industrial POPs as well.

## Annex 1: Agenda of the workshop

| DATE                 | TIME                  | AGENDA  | LEAD/FACILITAOR                                  |
|----------------------|-----------------------|---|--|
| Monday<br>27-3-2023  | Traveling to Naivasha |   |  |
| Tuesday<br>28-3-2023 | 8.30 AM - 9.00 AM     | Arrival and registration  | All  |
|                      | 9.00 AM - 9.30AM      | Opening remarks From the Ministry   | PS Environment/<br>Director MEAs                 |
|                      | 9.30AM - 10.00 AM     | Project brief   | Edward Njuguna                                   |
|                      | 10.00 AM - 10.30AM    | Break   |  |
|                      | 10.30AM - 11.30AM     | Presentation of The National Gap Analysis   | Francis Kihumba                                  |
|                      | 11:30 AM -12:00 PM    | Presentation of training POPs data training materials   | Edward Njunguna                                  |
|                      | 12.00 -1.00 PM        | Testing of the ToolkitIntentionally produced POPs <ul style="list-style-type: none"> <li>• DDT</li> <li>• Industrial POPs</li> <li>• POPs Pesticides</li> </ul> | Anthony Wainana-DDT<br>Mr. Francis Kihumba-UPOPs |

|                                   |                 |  |  |
|-----------------------------------|-----------------|--|--|
|                                   |                 | <p>Exemptions</p> <p>Unintentionally Produced POPs</p> <ul style="list-style-type: none"> <li>• Furans</li> <li>• Dioxins</li> <li>• PCBs</li> <li>• HBDs</li> <li>• PFOAs</li> </ul> <p>Stockpiles and wastes</p> <p>National Implementation Plans</p> <p>Public awareness</p> <p>Finance mechanism</p> <p>Effective evaluation</p> | <p>Benedict Makali-Pesticide POPs</p> <p>Leonard Tampushi/Prof. Orata/Vincent Madadi</p>   |
|                                   | 1.00 pm- 2.00pm | Lunch break  |  |
|                                   | 2.00pm -4.00pm  | Testing the toolkit (continuation)   | <p>Anthony Wainana-DDT</p> <p>Mr. Francis Kihumba-UPOPs</p> <p>Benedict Makali-Pesticide POPs</p> <p>Leonard Tampushi/Prof. Orata/Vincent Madadi</p> |
| <p>Wednesday</p> <p>29-3-2023</p> | 8.30AM – 9:30AM | Review and Report /findings from the toolkit testing   | <p>DDT-Anthony Wainana</p> <p>UPOPs- Francis Kihumba</p> <p>Pesticide POPs- Benedict Makali</p>  |

|                       |                     |   |                                   |
|-----------------------|---------------------|---|-----------------------------------|
|                       |                     |   | Industrial POPs- Leonard Tampushi |
|                       | 9.30AM -10.30 AM    | Reference and Data  | Mr Kihumba                        |
|                       | 10.30 AM - 11.00AM  | Tea Break   |                                   |
|                       | 11.00 AM-1.00 pm    | Groups discussion to complete POPs data collection                                    | All                               |
|                       | 2.00 pm- 4.00 pm    | Groups Complete to complete POPs data collection                                      | All                               |
|                       | 4.00 PM -5.00 PM    | Presentation from the groups on POPs data collection                                  | Group leads                       |
| Thursday<br>30-3-2023 | 8.30am – 9:30 AM    | Review of the progress made   | Francis Kihumba                   |
|                       | 9.30AM -10.30AM     | Report on how the toolkit can be linked to existing databases at the national level   | ALL                               |
|                       | 10.30 AM-11.00Am    | Tea break   |                                   |
|                       | 11.00 am – 11.30 am | Discussion on institutional framework for the management of the SC reporting toolkit. | All                               |
|                       | 11.00 AM-1.00 PM    | Discussion on the project replication   | All                               |

|                     |                  |  |  |
|---------------------|------------------|--|--|
|                     | 1.00 PM -2.00PM  | Lunch break  |  |
|                     | 2.00 PM-4.00PM   | Presentation of the draft workshop report and adoption of the report | Faith Nyokabi  |
| Friday<br>31-3-2022 | 8.30AM - 9.30AM  | Review of progress made  | Edward Njuguna   |
|                     | 9.30AM - 10.30AM | Drafting the Forward and executive summary for the final report      | Francis Kihumba<br>Vincent Madadi<br>Prof. Orata Francis |
|                     | 10.30AM -11.30AM | Tea break  |  |
|                     | 11.30PM -1.00 PM | Drafting the project policy brief                                    | Francis Kihumba<br>Edward Njuguna                        |
|                     | 1.00 PM -2.00PM  | Lunch Break  |  |
|                     | 2.00PM -4.00PM   | Finalization of the reports and summary of the workshop              | Francis Kihumba<br>Edward Njuguna                        |
|                     |                  |  | Closing remarks  |

## Annex 2: List of workshop participants



MINISTRY OF ENVIRONMENT CLIMATE CHANGE AND FORESTRY  
 State department for Environment and Climate Change  
 Integrated Sc Reporting Toolkit Meeting 27<sup>th</sup>- 31<sup>st</sup> March 2023  
 Naivasha

LIST OF PARTICIPANTS

| NO | NAME             | INSTITUTION | CONTACT NO. | EMAIL ADDRESS              | 27/03/2023 | 28/03/2023 | 29/03/2023 | 30/03/2023 | 31/03/2023 |
|----|------------------|-------------|-------------|----------------------------|------------|------------|------------|------------|------------|
| 1  | Albert Nyagochi  | KEBS        | 0722725856  | nyagochi@kebs.org          | Att        | Att        | Att        | Att        | Att        |
| 2  | Tampuchi Leonard | NEMA/EPH    | 079950239   | tampuchi@gnail.com         | ✓          | ✓          | ✓          | ✓          | ✓          |
| 3  | MELU William     | MECCF       | 0723170732  | wtakuka@meccf.org          | ✓          | ✓          | ✓          | ✓          | ✓          |
| 4  | Francis Kihumbi  | MEF         | 0722431110  | kihumbi@me.gov.ke          | ✓          | ✓          | ✓          | ✓          | ✓          |
| 5  | FRED ISABOILE    | ICRAF       | 0722816803  | fred.isabw@icraf.org       | ✓          | ✓          | ✓          | ✓          | ✓          |
| 6  | Cherith FATH     | MECCF       | 0720759325  | fathcherith@meccf.org      | ✓          | ✓          | ✓          | ✓          | ✓          |
| 7  | ANTHONY WAINANA  | MOIT        | 0723775021  | anthonywainana@moit.gov.ke | ✓          | ✓          | ✓          | ✓          | ✓          |
| 8  | James Thojip     | MECCF       | 0702365905  | jammoh.lenj@meccf.org      | ✓          | ✓          | ✓          | ✓          | ✓          |
| 9  | Cyrus Mageni     | MECCF       | 0721640559  | CyrusMageni@gmail.com      | ✓          | ✓          | ✓          | ✓          | ✓          |
| 10 | Rachel Malela    | MECCF       | 0722575269  | rmalela@gmail.com          | ✓          | ✓          | ✓          | ✓          | ✓          |



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|----|-------------------|-------------|-------------|-------------------------|--------------------|--------------------|--------------------|--------------------|--------------------|
| 1  | Lucy Kaari        | MECCF       | 0722-355139 | kaari.lucy@gmail.com    | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 2  | Edward Njiru      | MECCF       | 0710785077  | njiru.edward@gmail.com  | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 3  | Benedict Nakali   | PCPB        | 0727463283  | bnakali@pcpb.go.ke      | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 4  | Leonard Gitu      | TCUNT       | 0724495799  | gitumleo@gmail.com      | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 5  | Vincent O. Madahi | UDN         | 0728465685  | vincento@udn.go.ke      | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 6  | Francis Orata     | MMUST       | 0718282462  | forata@mmust.ac.ke      | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 7  | Faith Nykabi      | MECCF       | 072743502   | nykabi.nambag@gmail.com | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 8  | Brian Kigame      | MECCF       | 0719106727  | brian.kigame@gmail.com  | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 9  | Daniel Kioko      | MECCF       | 0742261599  | dkiooko@meccf.go.ke     | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |
| 10 | John Mumbo        | NEHA        | 0723956480  | jmumbo@neha.go.ke       | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> | <i>[Signature]</i> |

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|----|--------------------|-------------|-------------|--------------------------|-------------|-------------|-------------|-------------|-------------|
| 1  | ELUIS OTOKI        | MEF         | 0703588686  | eluisotoki@gmail.com     | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
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| 3  | JOHN KAMAU         | MEF         | 0721105932  | Johnkamu@gmail.com       | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 4  | Alice MPTEN        | MECC        | 0722888735  | alicempten@gmail.com     | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 5  | SAMUEL MAGUTA      | MEF         | 0715380508  | Samuel63@gmail.com       | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 6  | BENSON MIRITI      | MEF         | 0722135976  | MIRITIBENSON@gmail.com   | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 7  | Catherine W. GILBO | MEF         | 0722305235  | nyambigibore@yahoo.com   | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 8  | DR. Lucy Nganga    | MEF         | 0721884693  | lucynganga09@gmail.com   | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 9  | Meshack Odhuma     | MEF         | 0721335772  | meshacko@gmail.com       | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |
| 10 | Kogi Nderitu       | MEF         | 0722820403  | nderitu@gmail.com        | [Signature] | [Signature] | [Signature] | [Signature] | [Signature] |

has not been 09/03/23

