SUMMARY REPRESENTATIONS FROM THE PUBLIC AND STAKEHOLDERS CONSULTATION PROCESS ON THE FRAMEWORK FOR REDUCTION OF CO_2 EMISSION IN THE ICT SECTOR HELD BETWEEN 17TH SEPTEMBER 2025 TO 17TH OCTOBER 2025

No.	Name of Stakeholder	Section of the Framework	Current Content	Proposed Content	Justification	Authority position	Justification for Authority position	New Content
1	Airtel Networks Kenya Limited	10. Monitoring and Reporting of Reduction of Carbon Emissions	Service providers will on an annual basis report on their efforts to reduce their individual carbon footprint. The reporting template will be embedded in the quarterly compliance returns form but will be reported on annual basis. The reporting template for the telecom and postal subsectors will be as shown in table 2 and 3.	We will require more information and definitions of the parameters mentioned in Table 2 to enable us to provide the required data for annual reporting.	Definition of the items listed is required and can be given	Adopted	To ensure clarity and consistency in reporting from different service providers, definitions will be provided	To be defined: Green ICT Sites: - Refers to a site that is purely off grid and uses renewable energy like wind and solar. Shared ICT Sites:- Refers to telecommunication installations where service providers either co locate or shares passive/active infrastructure. Smart ICT Sites:- These are telecom/broadcast installations with sensors that are used for controlling site utilities and enabling remote monitoring and control.
2	Safaricom PLC	9(V) ICT Infrastructure Sharing	New ICT projects will be granted approval on the basis that they are constructed on a shared ICT infrastructure basis, and their design is in full compliance with the Authority's	Service providers of new ICT projects will be encouraged to have their projects constructed on a shared ICT infrastructure basis, and their design is in full compliance	The Authority to intervene where there are disputes as requiring operators/service providers to share infrastructure may not be feasible in some	Adopted with modifications	Section 85 A of KICA requires licensees to agree on co location and could refer the case to the Authority where no agreement is reached.	For new ICT project service providers will be required to co locate and share facilities in areas where there is existing infrastructure. Approval for new ICT project that are not co

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			framework for infrastructure sharing.	with the Authority's framework for infrastructure sharing.	circumstances which may occasion negative impact such as anticompetitive practices among others.			located/shared will only be granted where it is not feasible to share or there is no existing infrastructure.
3	Ms. Lydia Nyawira Mburia- NEMA EIA & SEA Associate Expert,	General	N/A	Mainstream Co2 Reduction Framework in The ICT Sector in the Annual Environmental Sustainability National and County Performance Contract targets for ease of coordination to ensure full enforcement and compliance;	Ease of coordination between the County and National Governments	Not adopted	The Authority's mandate as the ICT sector regulator does not span ICT performance contracting activities and initiatives for the National and County	None
				Institute, monitor and evaluate implementation of Environmental Management Systems ISO 14000 & ISO 14001 in the implementation and management of Co2 Reduction Framework in The ICT Sector;	To ensure that organizations improve their environmental performance through more efficient use of resources and reduction of waste.	Adopted	To ensure that ICT licensees improve their environmental performance through more efficient use of resources and reduction of waste during service provision.	Table 1 has been edited appropriately to include ISO 140001
				Institute, monitor and evaluate	Embrace education for	Not adopted	The Authority' mandate as the ICT sector regulator	None

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				implementation and management CO₂ Reduction Framework in The ICT Sector in the CBC Curricula in primary, secondary schools, TVETs as well as Universities.	sustainable development.		does not include review of the education system curricula.	
				Benchmark with Germany, Rwanda, Congo on best practices on Co2 Reduction Framework in The ICT Sector.	To align with best practices	Noted	To ensure alignment with best practices	The Authority referenced and benchmarked international best practice and standards in development of this framework.
6	POA Internet		New ICT projects will be granted approval on the basis that they are constructed on a shared ICT infrastructure basis, and their design is in full compliance with the Authority's framework for infrastructure sharing.	The obligation for submission of justification where site sharing and collocation have not been undertaken.	This will make deployment of telecommunications infrastructure quite tedious and time consuming	Not adopted but original text amended to for clarify	Where colocation is not agreed, submission of a justification is mandatory	For New ICT projects, service providers will be required to co locate and share facilities in areas where there is existing infrastructure.

Approval for new ICT project that are not co located/shared will only be granted where it is not feasible to share or there is no existing infrastructure. |
| | | | | CA should facilitate an easier process for co-location by allowing flexible arrangements in areas with less competition, and | Considering that the business model, type of infrastructure and locations for deployment are | Noted | This already catered for in the KICA 85 A where justification is required for not co location | For New ICT projects, service providers will be required to co locate and share facilities in areas where there is existing infrastructure. |

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				also by exempting SMEs from this requirement	different from large operators.			Approval for new ICT project that are not co located/shared will only be granted where it is not feasible to share or there is no existing infrastructure.
7	EIK - Environment institute of Kenya	General Comment	N/A	Broaden the scope of carbon emission measurement to include emissions analysis across the entire supply chain, from production to disposal (cradle-to-cradle and cradle-to-grave).	This would offer a more comprehensive understanding of the emissions associated with ICT projects throughout their lifecycle.	Not adopted	The International telecommunications Union (ITU) is currently developing a framework for Digital Product Passport (DPP) which contains comprehensive information on the composition, origin and environmental impact of ICT ranging from materials used, reusability, energy consumption and proper end-of-life disposal. Once this framework is implemented , the Authority will initiate review of this framework and incorporate the DPP aspects	None