

KENYA

Abbreviated Resettlement Action Plan

ADDENDUM

Lake Turkana Wind Power

Access Road 'Sub-Project'



Rehabilitation Infrastructure Development of

Existing Minor Roads for Site Access

Marsabit County

September 2014

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List of Acronyms

AfDB	African Development Bank
A-RAP	Abbreviated Resettlement Action Plan
CLO	Community Liaison Officer
COO	Chief Operating Officer
FMO	Dutch Development Bank
EIB	European Investment Bank
ESHS	Environmental, Health, Safety
EKF	Danish Export Credit Agency EKF
ESIA	Environmental Social Impact Assessment
FRC	Full Replacement Cost
HGV	Heavy Goods Vehicle
HV	High Voltage
IFC	International Finance Corporation
km	Kilometre
LCPDP	Least Cost Power Development Plan
KES	Kenya Shillings
kV	Kilovolt
LTWP	Lake Turkana Wind Power Limited
MW	Megawatt
NEMA	National Environment Management Authority
NTP	Notice to Proceed
NTS	Non-Technical Summary
OPIC	US Overseas Private Investment Corporation
PAH	Project Affected Household
PAS	Projected Affected Structures
PS	Performance Standards (IFC)
RAP	Resettlement Action Plan
PROPARCO	French Development Finance Institution PROPARCO
RPF	Resettlement Policy Framework
SPV	Special Purpose Vehicles
TSA	Lenders Technical Service Advisor

Preface

The Addendum has been produced by Lake Turkana Wind Power (LTWP) as a standalone supplement to the DRAFT Abbreviated Resettlement Action Plan (A-RAP) in order to provide Lenders and Stakeholders with a concise update as to the status of the resettlement implementation process; stakeholder engagement undertaken to date; eligibility changes and community benefits agreed with the affected communities from that disclosed in the Draft A-RAP, submitted in February 2013.

It is not the intention of this Addendum to repeat or duplicate all the information detailed in the Draft A-RAP but for purposes of continuity between the documents and to enable the reader to put in to context the variance between the documents some duplication is necessary.

This Addendum endeavours to provide a summary of the more noteworthy aspects of the Draft A-RAP and how LTWP has dealt with the concerns of the affected communities given the extensive delays in implementing the Project. The reader should refer to the Draft A-RAP and LTWP's Resettlement Policy Framework (RPF) for aspects of general RAP document structure\ content such as, legal framework and others that are not fully detailed in this Addendum.

This Addendum is structured in two Sections as detailed below.

Section 1, summaries the background to the Project; its relationship to the Sub-project, approximately 200km of existing roads that will be rehabilitated and upgraded to provide improved access to the wind-farm site; the significant environmental, social, health and safety aspects of involuntary resettlement, associated with the Vendors and Project Affected Households (PAHs) located illegally within the road reserves in the villages of Namarei and Illaut.

Section 2, seeks to detail the progress made to date in implementing the A-RAP Sub-project resettlement action items and activities. Starting with the re-verification of initial asset enumeration and comparing the latest socio-economic information gathered against the PAH entitlement and vulnerability matrixes from that presented in the Draft A-RAP 2012.

This Addendum confirms that the RAP was a negotiated process; enabling the avoidance of forced evictions; that Vendors\ PAHs were consulted and provided with full disclosure of information, enabling them to understand their rights; the compensation packages being offered; the assistance provided by LTWP to ensure an efficient implementation process; fair and non-discriminatory treatment of any grievances as well as open and honest engagement respecting the wishes of the communities with regard to mitigation and enhancement packages; the payment of prompt compensation; that any adverse impacts or relocation hardships were minimised; and the completion of the compensation process with the demolition of the affected structures and removal from the road reserve.

Section 1: Sub-Project Previous Disclosure Summary

1.1. Project Background

The Lake Turkana Wind Project, an electrical infrastructures project, located in northern Kenya adjacent to the southeast shores of the lake in the Marsabit district herein referred to as “the Project” comprises of two components: construction of a 300 Megawatt (MW) wind farm and rehabilitation of 200 kilometre (km) of existing minor urban roads. The road rehabilitation is the subject of this A-RAP Addendum herein referred to as “Sub-project”.

The Project location is particularly favourable for generating electricity from wind turbines as it situated within the “Turkana Wind Corridor” where subtropical wind jet streams pass between Mount Kulal to the north and Mount Nyiru to the south of the wind-farm site. These subtropical wind jet streams, originating in the Indian Ocean, aided by the high and low temperature climatic conditions between the mountains and the Lake produce a natural venturi effect, accelerating the winds across the wind-farm site at low (~50m) atmosphere levels, creating strong, predictable and ideal wind conditions for electrical power generation from wind turbines.

The Project, forms part of Kenyan’s energy sector, Least Cost Power Development Plan (LCPDP), and diversification towards clean technologies; comprising of 365 wind turbines, associated overhead medium 33,000 voltage (33kV) collection system and a high voltage (HV) substation as well as a network of access roads in and around the site for construction, operations and maintenance. Export of the electrical power will be via a high voltage 400kV transmission line, an ‘associate’ facility, to be constructed and operated by Kenya Electricity Transmission Company Ltd (KETRACO), a Kenyan parastatal with the remit for developing all HV transmission lines and substations of 132kV and above.

1.2. Transport Route

The major equipment will be brought into Kenya via the deep water port of Mombasa where it will be offloaded onto Special Purpose Vehicles (SPV) and transported to site, a distance of 1,200km, see figure below that portrays an overview of the transportation route from Mombasa to the wind-farm site to a locality named Sirima, situated in the Mount Kulal sub-location of Marsabit County.

The transport route can be broken down into two sections. Section 1, Mombasa, Nairobi and up to Laisamis town a distance of 1,000km and designated ‘A-Class’

roads of bitumen construction. This stretch of the transport route has been confirmed suitable to transport all of the equipment necessary for the construction of the Project. Section 2, the Sub-project\ site access route, from the turnoff at Laisamis town to the wind-farm site, a distance of around 200km, designated 'B, C, D and E-Class 'roads and are a mixture of gravel and murram. These roads are in poor condition and unsuitable to carry the long and heavy SPV's that will transport the equipment to site.

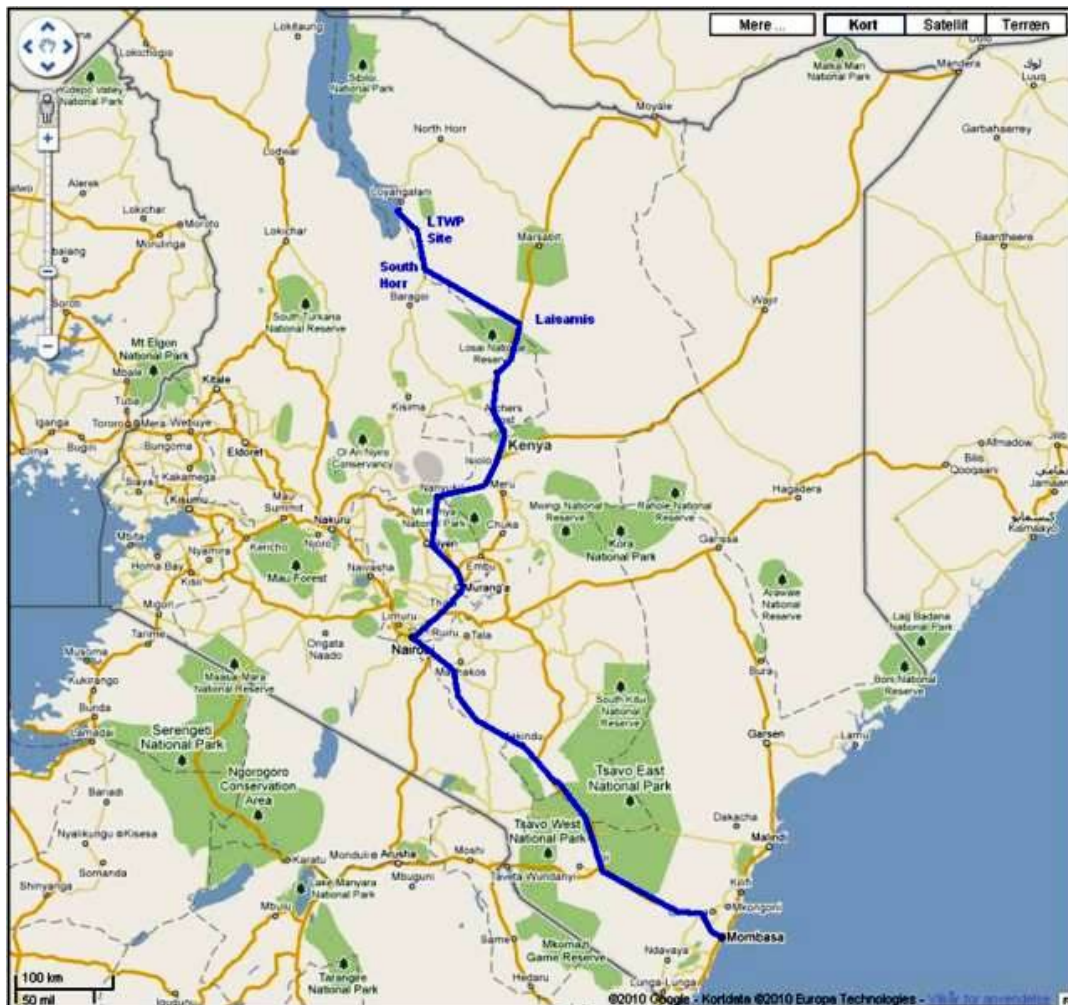


Figure 1: Overview of Transportation Route

1.3. Stakeholder Consultation and Realignment Requirements

Following disclosure of the Environmental Social Impact Assessment (ESIA) report for the proposed strengthening of Laisamis – South Horr (D371) and South Horr – Loiyangalani (C77) Road June 2010, the stakeholder consultation process feedback identified several villages that were concerned with the proposed alignment of the Sub-project\ site access route. LTWP engaged with the concerned villages, South Horr, Ngurnit and Karungu where significant settlement exist; with (7,000), (4,000)

and (1,000) households respectively; these communities requested LTWP to developed a bypass plan avoiding these villages. LTWP, taking on board the communities concerns, undertook additional rerouting investigations that looked at the various alternative routes using existing roads. LTWP, following extensive investigation identified an alignment that bypassed these villages. Figure 2 below, portrays the bypass realignment of the initial route in line with the community's wishes to avoid the villages of South Horr, Ngurnit and Karungu thus minimising the impact on circa (12,000) households.

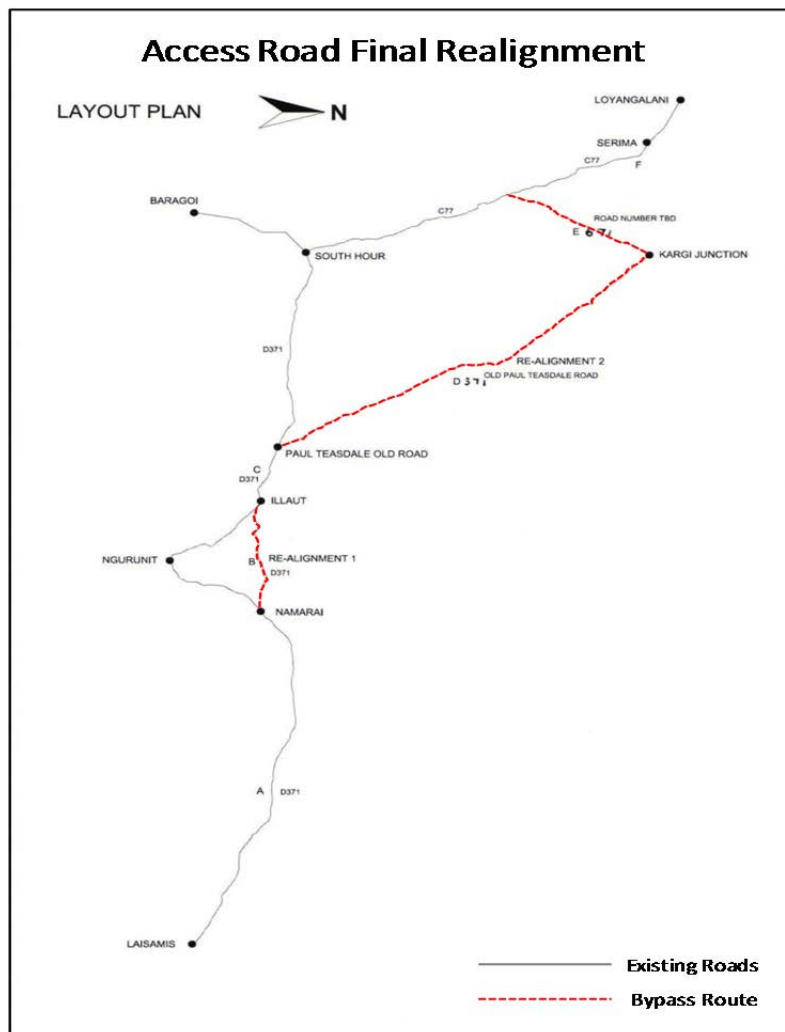


Figure 2: Depicts the Bypass Routes avoiding the concerned villages

1.4. Justification for Realignment of Sub-project

From the detailed mapping and physical survey work undertaken these rural roads will require extensive rehabilitation works including strengthening weak sections; realignment, levelling and grading, construction of culverts, sealing and water

proofing as well as general repairs in order to accommodate the SPV's and Heavy Goods Vehicles (HGV) transporters carrying equipment to site.

Following the rehabilitation works which is anticipated to be completed in eleven (11) months from giving of Notice to Proceed (NTP) to the contractor; the existing rural road network will be restored to its original 16m cross section, consisting of 6m wide earth and hard-core gravel with road reserves of 5m on each side. The final access route re-alignment significantly reduces the physical resettlement requirements that would have been necessary compared to the initially proposed route along the [D371 and [C77] roads. The realignment in its final form, is away from the high impact residential areas of the villages of South Horr Ngurnit and Kurungu and will undoubtedly prevent accidents, minimise construction impacts, transportation hazards and unnecessary misfortunes that may have occurred if the route had remained in its original alignment. The revised and agreed realignment and associated rehabilitation works proposed will not only prevent further degeneration of the existing road surfaces but will improve the functional condition, provide better access and safety as well as prolong maintenance life cycle requirements.

The agreed final alignment, shown in the below Figure 3 passes through Namarei and Illaut villages where a bypass will be created avoiding Ngurnit village and a second bypass will also be created using the old 'Paul Teasdale' road up to Gatab junction and down to Kargi junction where the realignment re-joins with the [C77] road avoiding the villages of South Horr, Ngurnit and Kurungu. These bypasses added circa 20km to the length of the access road to site.

The realignment necessitated submission of an ESIA Addendum, June 2011 to National Environmental Management Authority (NEMA) and designs to the Ministry of Transport. Both institutions approved the realignment of the wind-farm site access road.

The Project Non-Technical Summaries (NTS) and RPF were submitted along with the ESIA's for wind-farm and road rehabilitation to both the African Development Bank (AfDB) and World Bank Group's public disclosure of information platforms and LTWP's web site. The RPF and ESIA's were prepared by international and local consultants.

The Draft A-RAP of 2012 was prepared in compliance with the policies and principles for involuntary resettlement of AfDB, International Finance Corporation (IFC), LTWP's RPF as well as the NEMA ESHS guidelines, land tenure laws and regulations in Kenya. The valuations of affected assets were undertaken by independent Kenyan registered consultancy practices.

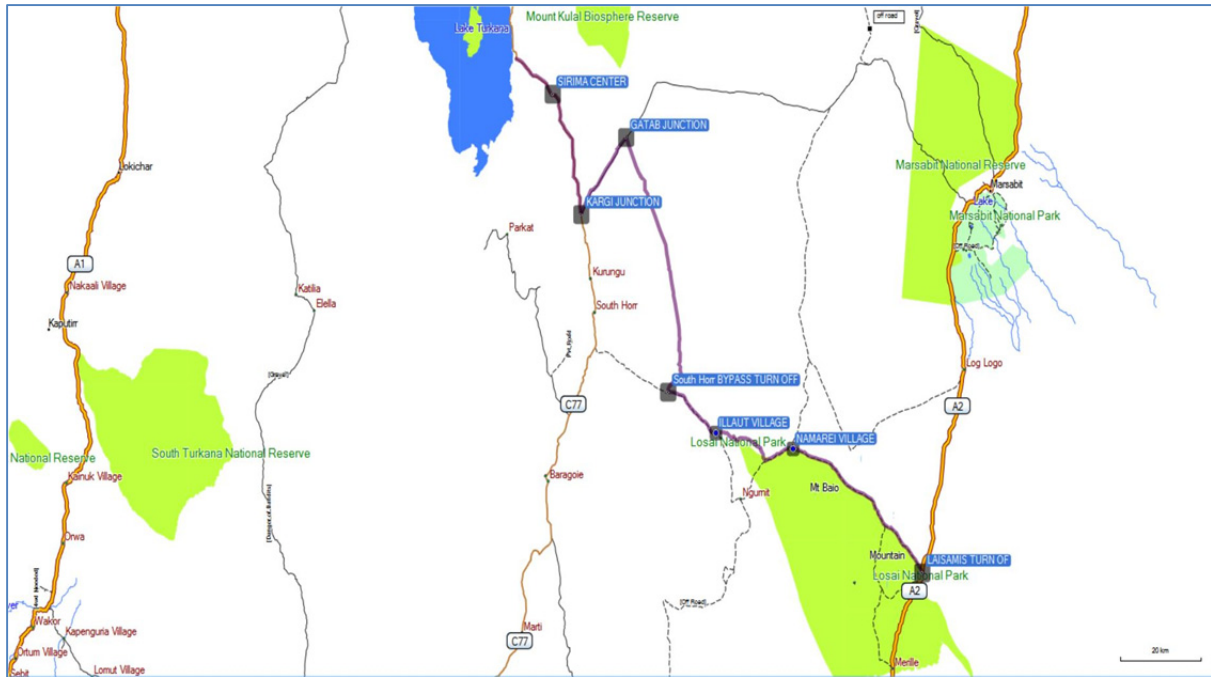


Figure 3: Final Access Bypass Route

1.5. Statement of Concern

Having significantly mitigated the social aspects of the proposed access road alignment with the rerouting and bypassing of the concerned villages, the Sub-project still has some residual social aspects to deal with as described below.

In the villages of Namarei and Illaut informal Vendors and residential structures are illegally located within the existing road reserve. The business premises located within the road reserve can best be described as ‘multi-function’ trading posts, built to provide various services and commodities to passing motorist and travellers. Unfortunately, the small number of vehicles and travellers currently using these roads and the competition from similar enterprises could not sustain all of the commercial businesses located in the road reserve. Some of these premises were found dormant and had not been trading at the time of enumeration. Comments and expectation from vendors indicated that they hoped to re-establish their businesses when the new road was completed and access to this part of the county was improved.

The main adverse impact of this access road\Sub-project is the relocation of unauthorised Vendors and residential structures out of the existing road reserves.

The unauthorised Vendors/PAHs encroaching within the designated [D371] road reserve both in Namarei and Illaut are the main subject of the Draft A-RAP.

1.6. Policy and Legal Framework

There is no change to this section. Please refer to Draft A-RAP for detailed information.

1.7. Consultation and Community Engagement

LTWP through its Community Liaison Officer (CLO) and Chief Operating Officer (COO), have continued to engage with the communities of Namarei and Illaut on a formal and informal manner, providing project updates, pamphlets, flyers and dealing with grievances all of which is reported back to the LTWP RAP team for resolution and monitoring purposes. Details are recorded in the grievance register along with actions and resolution taken by the LTWP RAP team who are responsible for overseeing, monitoring and auditing the various resettlement aspects associated with the Project.

The CLO is resident in the area and is the main point of contact with the affected communities. The COO travels to site on a monthly basis undertaking Project administrative and development work and calls in with the affected communities to listen to concerns, provide updates and or resolves grievances.

The consultation has covered a broad spectrum of matters including:

- Briefing as to the status of the Project;
- Discussions and briefing as to the need to realign the Sub-project;
- Briefing on potential impacts, both positive and negative;
- Briefing as to the legal procedures regarding encroachment within a designated road reserve;
- An inventory of assets that could potentially be affected by the project;
- Proposed compensation process, procedures, timing, options available and assistance measures to be provided;
- Implication of the asset inventory cut-off date;
- Grievance procedure; and
- Outline and update of the road rehabilitation schedule.

1.8. Alignment and Asset Encroachment Inventory Verification Exercise

The asset encroachment inventory was originally undertaken in March, 2012. The survey established that there were in total twenty (20) Vendors/PAHs each with a structure encroaching within the road reserve in the villages of Namarei and Illaut that will need to be relocated. The exercise also established that of the twenty (20) Vendors, those currently transacting numbered eleven (11) and have established businesses with regular clientele; the others (3) had not been trading for some time.

In addition to the above (20) structures, encroaching within the road reserve, there are an additional twenty-six (26) associated structures belonging to Vendors\ PAHs

that LTWP has agreed to compensated as part of the A-RAP individual option\ benefit package. These ancillary structures (26) will also be compensated in accordance with the principles outlined in this RPF i.e. at full replacement cost plus 15% as a disturbance allowance. The structures for the most part are makeshift, of rudimentary construction and not located within the road reserve, can easily be dismantled, many of which can be detached from their basic foundations footings and carried to a new location so that collectively all these associated structures can be relocated to an area agreed in consultation with the village administrators and to the satisfaction of the Vendors\ PAH. During the asset survey it was confirmed that here is sufficient land adjacent to and behind the Vendors\ PAHs directly affected structures to relocate both the affected structure and the associated structures in a manner that best optimises the area to meet with cultural and domestic needs as well as providing favourable access to passing trade and to the local community. The land along the length of the site access route is designated trust land, administered by Marsabit County Council for an on behalf of the community and hence there is no entitlement to compensate for loss of land.

Results of the initial census survey (March 2012) of directly and indirectly impacted assets are categorised in the table below:

Total Number of Structures			
I	Structures within Road Reserve		20
		Business Premises	14
		Residential Structures	3
		Community Facilities	2
		Administration Building	1
II	Associate Structures		26
		Kitchens	7
		Animal Units	5
		Sanitary Facilities	5
		Residential Structures	8
		Extra Business Premises	1
		Total Number of Structures	46

Table 1: Entitled Structure Summary.

Note: (The Administrative building above was mistakenly categorised as the Chief Office. Its main use was a residence. At times the Chief's residence is also used as a meeting venue. Please see Table 2 in Section 2 were this structure has been re categorised as a residence).

1.9. Socio-economic Enumeration

There is no significant change to this section. Please refer to Section 5 of the Draft A-RAP for detailed information.

1.10. Valuation and Compensation

There is no significant change to this section. Please refer to Section 7 of the Draft A-RAP March, 2012 for detailed information and revaluation of entitled asset assessment in Section 2.7 undertaken in June, 2014.

Noteworthy matters are as follows;

- Vendors\ PAHs are aware of their rights;
- The Land being occupied is a road reserve and designated as public property\ Trust Land;
- Valuation of structures was assessed at full replacement cost, without depreciation;
- Transitional assistance is proved for i.e. 15% of full replacement cost of all structures as a 'disturbance allowance';
- Loss of income for those trading was assess by the consultant and agreed with the Vendors amounting to one month loss of income and will be paid as part of the Vendors individual compensation packages;
- All Vendors\ PAHs expressed a preference for cash compensation;
- None of the Vendors\ PAH requested relocation assistance from LTWP;
- Structure relocation sites were agreed with the administration authorities, mainly setback from the current location to an area just outside the designated road reserve; and
- The cut-off date was set as March 2012.

1.11. Conclusions

The construction of the Sub-project, in general terms, will undoubtedly disrupt the villages and the communities along the agreed realignment however this will be of a temporary nature. Access to assets and livelihood, for those Vendors\ PAHs relocated, will cause some disruption to normal daily activities and will be a hardship over and above the general construction impacts and mitigated by the 15% disturbance allowance provided as part of their compensation entitlement offers. However, given the rudimentary construction of these structures, many of which can be lifted intact and replaced in a new location, if required, the disturbance impact and the loss of livelihood is deemed minimal and will be mitigated and offset by the compensation packages detailed within the Draft A-RAP.

Consultations: Vendors\ PAHs have and will be consulted continuously about the RAP compensation process and procedures, the structure removal, salvage and relocation plan and implementation of the same prior to commencement of road and wind-farm site construction activities. Particular attention will be given to elderly and female Vendors\ PAHs and those that may request assistance from LTWP. Vendors\ PAHs will continue to be enlightened on the legal restrictions that govern the process and LTWP will provide assistance and basic training to Vendors\ PAHs in opening Bank Accounts and managing their accounts.

Draft A-RAP Implementation Budget: LTWP will set aside a budget of **KES 15,343 million** for the implementation of A-RAP Roads Sub-Project.

Compensation: The compensation package provided will be offered on a negotiated basis and agreed individually with the Vendors\ PAHs on a lump sum basis, established on full replacement costs for all structures both those directly affected and the indirectly affected associated structures identified during the initial affected asset inventory survey.

Compensation of structures will be implemented in a phased approach, in line with Kenyan compensation practices. Phase 1, payment of seventy percent (70%) of the total cash value\ compensation, as calculated by the independent valuation survey, which includes 15% disturbance on signing of Letters-of-Offer\ agreements and Phase 2, the remaining thirty percent (30%) when the 'affected structures' are removed from the road reserve. If cash compensation was not the preferred option of the Vendors\ PAHs when filing out their 'Letters-of Offer\ option agreement, LTWP will provide other methods of compensation such as, managing the relocation process by engaging third-party assistance, on behalf of the Vendor\ PAHs, to undertake the demolition and relocation of their structures, salvaging materials, transportation of new materials and building of or undertaking the necessary rehabilitation of their structures. Any balance remaining from the individual's compensation funds following undertaking of the above assistance will be returned to the Vendor\ PAH.

Loss of Income: Were applicable, loss of income will be paid as a one off payment prior to commencement of relocation.

Disturbance Allowance: A sum equal to 15% of the full replacement value will be added to the costs of structures by way of compensation as disturbance allowance.

Notice: A minimum of three (3) months' notice will be given to the Vendors\ PAHs to enable them to salvage whatever materials from their assets that they can.

Monitoring and Evaluation: Monitoring and evaluation will be a continuous process. LTWP will be responsible for all aspects of monitoring. Six months to one year upon completion of the A-RAP compensation phased activities and annually for the next 3 years, LTWP will conduct an assessment\ audit of the RAP process in conjunction with the Lenders TSA. This audit will be undertaken prior to one of TSA scheduled quarterly monitoring visits, to evaluate and document compliance with involuntary resettlement requirements, LTWPs RPF, Lenders requirements i.e. that the vendors and PAHs livelihoods are, as a minimum, restored to pre Sub-project status or develop remedial plans to improve or assist the Vendor\ PAHs to sustainable livelihoods and to record lessons learnt. The TSA mission will involve stakeholder engagement meetings at selected communities along the transport and site access route with directly affected Vendor\ PAHs to confirm the audit findings.

Grievance Redress Mechanism: LTWP has established its grievance mechanism as detailed in the Draft A-RAP. Please refer to Appendix 3 that provides a process flow diagram of the various steps in the grievance process.

Community Expectations: Vendors\ PAHs at various consultation meetings voiced their concern that LTWP should not delay the implementation process as they need to start preparing to relocate their structures, make plans for their future and lengthy delays could impact their planning.

Section 2: Sub-Project Update 2014

2.1. Introduction

Since submission of the Draft A-RAP the Project has been fraught with delays mostly outside of the Sponsors' control and as such sensitive and critical activities such as this A-RAP for the access road Sub-project needed to be put on hold until clarity with the timing of financial close could be more certain.

LTWP has continued to employ the CLO, COO and the RAP team. This team has continued to engage and consult with the communities, Vendors\ PAHs in Illaut and Namarei updating them as to the cause of these delays. The communities, Vendors\ PAHs have been patient and tolerant with these setbacks and have voiced their continued support for the Project at various consultation meetings.

2.2. Delay Implications

The main impact of implementing the A-RAP is as follows:

- The cost of materials, transportation and labour could have increased since the initial structure valuation inventory was completed, 2012;
- There is a need to verify the initial entitlement list to ensure that the PAH inventory list and valuation figures for affected assets are still valid;
- There is also the need to update the socio-economic, social and vulnerability standing of the Vendors\ PAHs to ensure that the data is still valid; and
- The compensations and assistance to be provided to Vendors\ PAHs still meets with the aspirations of the affected communities and is compliant with LTWP's RPF, involuntary resettlement best practices, guiding principles and Lenders requirements.

To this effect, in June 2014, when financial closure of the project was more certain, LTWP's RAP Team undertook a re-enumeration and valuation of the affected structures and associated assets of Vendors\ PAHs to ensure that the compensation\ assistance packages, vulnerability matrix and community benefits were still valid from that undertaken in the Draft A-RAP, 2012. The findings and recommendation are provided below.

In summary:

- The asset re-enumeration and social survey identified an additional structure that was not captured in the initial rerouting surveys. This structure, a residence, is located within the road reserve. The structure and its owner have been added to the directly affected asset entitlement matrix. See amended and updated asset entitlement matrix in Section 2.7, Table 2 'Updated Entitled Structure Summary' and the stakeholder summary Figure 5 below; and
- The on-going design and realignment of the bypass from Namarei and Illaut was amended due to the crossing of a riverbed 'Lagga' and this route amendment impacts the current market area in Illaut village. LTWP in consultation with the community and market traders have agreed to relocate the market away from its current location due to potential increase health, safety and traffic hazards. LTWP agreed to compensate for labour costs associated with relocating the market trader's stalls\ holding structures to a new Soko location details of which are provided below in Section 2.8 'Community Assistance Benefits' and the new location is portrayed in Figure 7.

Figure 4 below summarises the categorisation of the affected stakeholders following the re-enumeration and entitlement surveys undertaken in June, 2014.

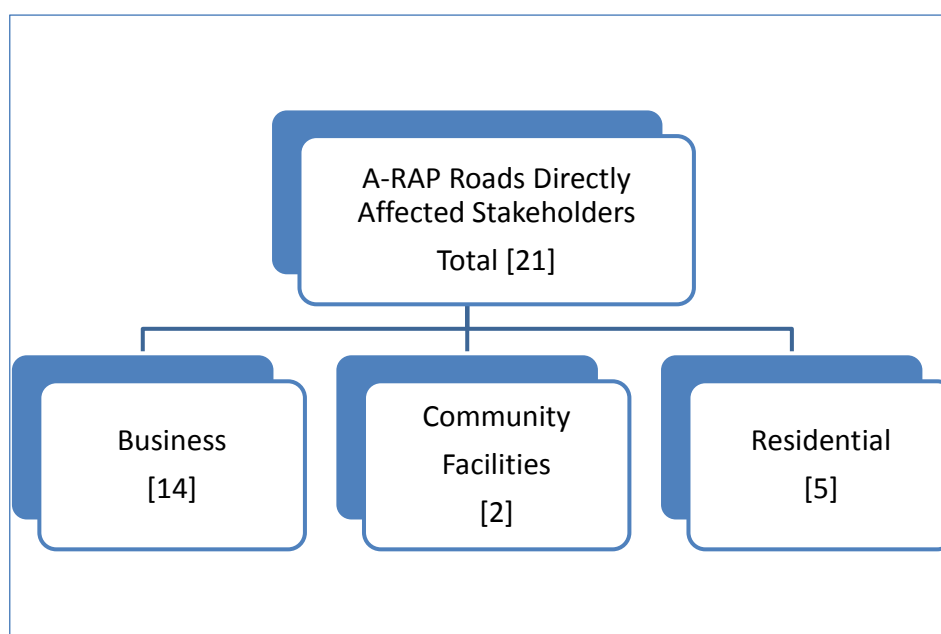


Figure 4: Illustration of General Stakeholder Categories (Namarei & Illaut)

Notes:

- As per the verification of asset survey (June 2014), there are 21 Project Affected Structures (PAS) which are directly affected i.e. located within the road reserve.

2.3. A-RAP Roads Addendum Statement of Objectives

The objectives of this Addendum is to provide Lenders and Stakeholders with a concise update as to the status of the stakeholder engagement, RAP and implementation undertaken to date as well as the amendments and benefits agreed with the directly affected Vendors\ PAHs and communities from that disclosed in the Draft A-RAP Roads as submitted in February 2013.

2.4. Statement of RAP Compliance and Responsibility

This A-RAP Addendum confirms and validates all eligible Vendors\ PAHs and the structures encroaching within the road reserve at the cut-off date, June 2014. For a more detailed overview of their business profile, valuation of their assets and other sources of livelihood as well as their socio-economic status please refer to Draft A-RAP Roads 2012.

The Draft A-RAP also clearly establishes the resettlement/ relocation provisions of the Sub-project including PAHs and Vendor's preferred relocation area, describes the compensation options to be offered and other relocation assistance to be provided, highlights the consultations measures undertaken, the potential impacts of the sub-project upon the Vendors\ PAHs and establishes mechanisms for grievance redress. The responsible institution, budget, implementation schedule and its monitoring is also described and is elaborated upon below.

The A-RAP Addendum has been prepared in accordance with the guiding principles outlined in LTWP's RPF, produced in 2011 when certain aspects of the Project and Sub-project designs were still to be confirmed and incorporates the re-enumeration undertaken in June 2014.

2.5. Statement of Changes to Compliance and Responsibilities

In addition to the above requirements and since submission of the Draft A-RAP for disclosure there has been a change to the financing structure for the Project. This Addendum has been prepared taking cognisance of the requirements, standards, environmental and social aspiration and values of LTWP, its RPF and new Lenders to the Project.

The LTWP Project sponsors comprise Aldwych International Limited (AIL); the Danish Investment Fund for Developing Countries (IFU), Finnish Fund for Industrial Cooperation (FINNFUND), KP&P Africa B.V, the Norwegian Investment Fund for Developing Countries (NORFUND) and Vestas Wind Power Invest A.S.

The Lenders include African Development Bank (AfDB), Danish Export Credit Agency (EKF), Dutch Development Bank (FMO), European Investment Bank (EIB),

French Development Finance Institution (PROPARCO), German Investment Corporation (DEG), and the US Overseas Private Investment Corporation (OPIC).

In addition, to meeting all relevant Kenyan legislative and permitting criteria, LTWP in conjunction with previous existing and new Lenders has developed and prepared an extensive Environmental and Social Management System (ESMS) for the Project and associated management plans which are currently under review by Lenders.

The main changes from that disclosed in the Draft A-RAP are the additional requirements of new Lenders to the Project and their requirement and standards are summarised and presented below:

- Applicable IFC 2012 Performance Standards (PS) and supporting guidance, as voluntarily adopted by the Project, in particular:
 - PS 1: Assessment and Management of Environmental and Social Risks and Impacts;
 - PS 4: Community Health, Safety and Security;
 - PS 5: Land Acquisition and Involuntary Resettlement;
 - PS 7: Indigenous Peoples (not directly applicable to Project, precautionary approach only); and
 - PS 8: Cultural Heritage.
- The AfDB's cross-cutting themes: poverty, health, environment, population, gender and participation.
- The EIB 2014 Environmental and Social Standards, especially:
 - 1: Assessment and Management of Environmental and Social Impacts and Risks;
 - 6. Involuntary Resettlement;
 - 8. Labour Standards;
 - 9. Occupational and Public Health, Safety and Security; and
 - 10. Stakeholder Engagement.
- OPIC Environmental and Social Policy Statement.
- Other specific Lender requirements and conditions - specifically those defined in the Lenders' Environmental and Social Action Plan (ESAP), and Environmental and Social Monitoring Report as detailed in the Project's Common Terms Agreement.

The below organogram depicts the Project environmental and social functional structure for the Project and the LTWP resources responsible for overseeing, managing, implementing and reporting process.

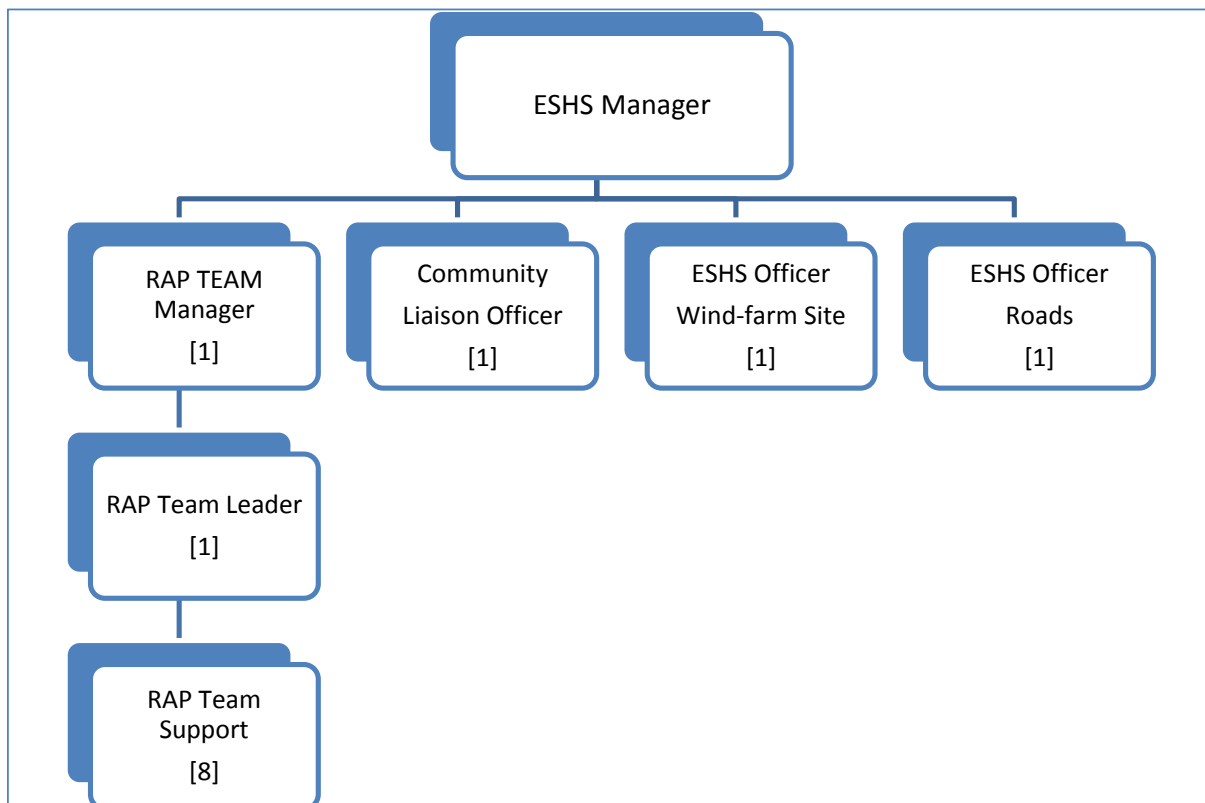


Figure 5: LTWP ESHS Functional Organogram for the Project

2.6. Vulnerability

This A-RAP Addendum is also aligned with the principles and requirements of the draft management plans and specifically those relating to involuntary resettlement, influx management and vulnerable or marginalised groups. LTWP has assessed the affected Vendors\ PAHs of Illaut and Namarei and from the socio-economic findings these directly affected Vendors\ PAH are not considered as vulnerable or marginalised groups as the relocation of these structures to a new location just out of the road reserve is a minor impact when compared to a resettlement involving a move to a host area\ community. Nevertheless any change, no matter how minor, can have serious social consequences and as such LTWP will treat these people with the sensitivity it merits and monitor these Vendors\ PAHs closely to ensure their livelihood is not impaired and their life style is improved prior to the coming of the Project. Please refer to Appendix 4, 'Vulnerability Screening Process'.

2.7. Influx Management

Clearly a major concern of any large infrastructure and LTWP's Lenders is influx management into the Project area and the detrimental impacts that this can have on local communities many of which do not have the necessary services or provisions to

cope with this potential adverse situation. LTWP has already been proactive in this aspect having set up labour employment office in Karungu, following discussions with the local administration, and as a requirement of Lenders and LTWP's project ESMS, the COO and CLO will work with the local administration to prepare and manage influx into the Project area and those villages along the Sub-project route.

Uncontrolled influx into the Project area of influence initially may impose cumulative social impacts upon the villages of Illaut and Namarei, circa 100km and 125km respectively however it is more likely that influx will be more towards the village of Karungu and South Horr that are much nearer the Project\ wind-farm site some 35km and 40km respectively. LTWP's COO and CLO will continue to monitor the situation, in all these villages along the Sub-Project route, as the Project moves into the construction phase. Please refer to LTWP's Stakeholder Engagement Plan for more detailed information.

2.8. Valuation Validation

With the advent of financial close imminent, LTWP prudently undertook a re-validation of the affected structures using an independent valuation company, GIMCO.

The scope of work undertaken by GIMCO is as follows:

- Assessment of the FRC of affected structures as per the entitlement matrix of March 2012, including the valuation of a homestead not previously identified in the initial entitlement survey;
- Comparing the initial valuation with current market values without depreciation and providing updated FRC of affected assets; and
- Included in the scope, GIMCO were to undertake a broad brush assessment of general inflation parameters in Kenya and particularly those associated costs with regard to building construction materials, transportation and local labour costs.

The report concluded taking cognisance of the above parameters that a fair and equitable increase ranged between 3% and 5% over the spectrum of items assessed. The report also noted and that compensation valuations in Kenya are valid for a 3-year period. Following the computation of the various materials and components including the various general improvements and finishes a value will be applied to the structure using market prices, availability\ transport costs and labour to demolish and rebuild the structure. Please refer to Appendix 5 that provides basic examples of the methodology associated with valuation of rudimentary structures in Kenya.

LTWP management taking cognisance of the submission put forward by the LTWP RAP Team, the findings and recommendation from GIMCO and approved the proposal to increase the previous valuation structure FRC by 5% and in addition added an additional 5% uplift for general inflation thus providing Vendors\ PAHs with an additional 10% benefit over and above the structure compensation figure previously recommended by Log Associates and disclosed in the Draft A-RAP, 2012. Please refer to the updated budget in section 2.11.

2.9. Entitlement Matrix Update

In addition, to that previous disclosed, this Addendum confirms the agreement between LTWP and Illaut community, finalised in June, 2014 to provide financial assistance\ benefit contribution towards the relocating of the traders' temporary stalls\ structures to a new location to the northern side of the Sub-project\ bypass route in order to mitigate adverse traffic impacts and help develop the market by making it safer for patrons attending the bimonthly event and improving client access.

LTWP also confirms that during a reconnaissance of the route an additional structure was identified to be too close to the road reserve and should be included within the affected structure entitlement matrix. The structure is a homestead, has been added to the current asset entitlement list and will receive cash compensation.



Picture: Affected homestead structure not previously captured

The previous unidentified homestead was valued using FRC, plus the additional uplift detailed in section 2.8 above and has been added to the current structure entitlement matrix, Table 2 below. This structure increases the directly affected structures to twenty-one (21) and the total number of structures that LTWP will compensation to forty-seven (47). Details of the categorisation of both the directly

affected and associated structures are portrayed in the below summary Table 2: “Updated Entitled Structure Summary”.

Figure 6 below further delineates the directly affected Vendor\ PAHs structures, in the two villages of Namarei and Illaut in accordance with the dominate business use. Illaut with its bimonthly market caters for clients who may need overnight accommodation. Most of these businesses also provide typical hotel services and as such it has been difficult to get an agreed census with the Vendors as to what is the predominant business use\ categorisation and therefore LTWP has made an informed judgement following the re-enumeration survey of June 2014 which differs from that provided by Log Associates in the Draft A-RAP Roads of 2012.

Total Number of Affected Structures			
I	Structures within Road Reserve	21	
		Business Premises	14
		Residential Structures	5
		Community Facilities	2
II	Associated Structures	26	
		Kitchens	7
		Animal Units	5
		Sanitary Facilities	5
		Other Residential Structures	8
		Extra Business Premises	1
Total No. of Structures to be Compensated		47	

Table 2: Updated Entitled Structure Summary

Appendix 6 provides a matrix of the various compensation entitlements, eligibility of the Vendors\ PAHs how they are treated in terms of impact, vulnerability an per Kenyan law.

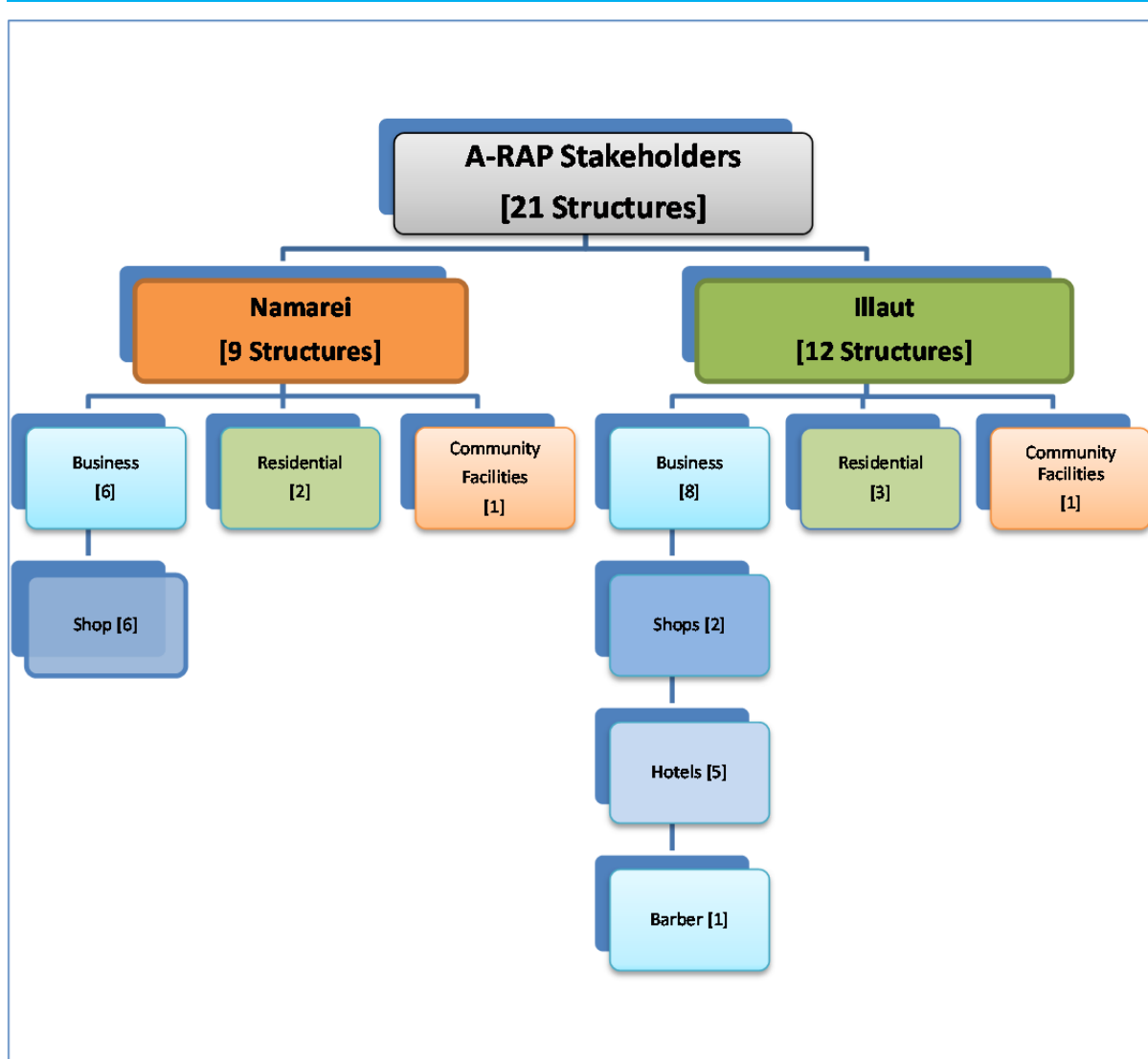


Figure 7: Illustration of Affected Structure by Category and Distribution by Village.

The table below provides summary details of the socio-economic information held on file by LTWP regarding the number of PAHs, associated family members (PAPs) and affected structures.

Villages	Number of PAHs	Total Number of Structures	Number of PAPs (including HH) Namarei and Illaut (Socio-Econ exist)
Namarei	9	15	58
Illaut	12	32	70
TOTALS	21	47	128

Table 3: Summary listing of PAHs, PAPs and Affected Structures

2.10. Community Assistance \ benefits

In late 2013, following a reconnaissance of the bypass route between Namarei and Illaut it became apparent that the route impacted on the location of the Illaut village market 'Soko'. The market is held once a fortnight and is the epicentre of the village during these two market days whereby people from outlying areas come to meet, greet, purchase provisions, commodities and or sell and buy livestock.

The alternative options were to amend the route around the 'Soko' either to the north away from the market across a semi-dry river bed 'Lagga' and towards the market livestock corral or to the south joining the Ngurnit to Illaut [D371] road below the current junction. An informal meeting was initially convened to inform the local administration regarding the possible rerouting options. The administration requested LTWP to allow them time to consult with the community and the licensed market traders regarding the various options, impacts both negative and positive and the administration would revert in due course. This engagement process cumulated with a formal meeting in January 2014. The community, market traders and administrators agreed that collectively it would be best for all involved to retain the current alignment and to relocate the Soko to the northern side of the current alignment. The administration also requested LTWP to assist with the relocation. LTWP agreed to pay the cost of labour associated with moving and relocation of the structures made up of traders' stalls, shelters and storage \ holding stick bins. The cost to relocate the structures was agreed as KES 450,000. The meeting resolved that the village Administration Officers would oversee and account for labour payments either to the market traders or others depending upon who assisted the market traders with moving their assets to the new 'Soko' location.

The traders in consultation with the local administration identified an area, portrayed in Figure 7 below that they considered will improve access, reduce potential road traffic hazards and that the area selected has room for future development.

As shown in the Figure 7 and subsequent pictures below, the existing market area is very small and compact with many vendors' stalls. The main areas of concern raised by the market traders are gaps between the stalls that provide access both to the road from Ngurunit and also the proposed bypass which could potentially be a traffic hazard especially given the additional number of vehicles that will be traversing along the bypass once construction commences and the potential tourism that may use pass along the route given the wind-farm project and improved road conditions. The relocation of the market to the northern side of the bypass and Lagga should mitigate traffic impacts; improve safety aspects at the Ngurunit \ bypass junction and the potential to attract tourism into the area which they hope to benefit from.

The [D371] Ngurunit road is also the county boundary between Marsabit and Samburu. The Illaut community and majority of traders did not want to relocate the market into Samburu County as it would cause administrative issues. The area selected is adjacent to the existing market livestock corral and would mitigate the

crossing, to-and-fro, of the new bypass to the livestock corral when bartering for payment.

The figure below depicts the agreed relocation with the local communities, licensed market traders and local authorities that will mitigate the Illaut community concerns.

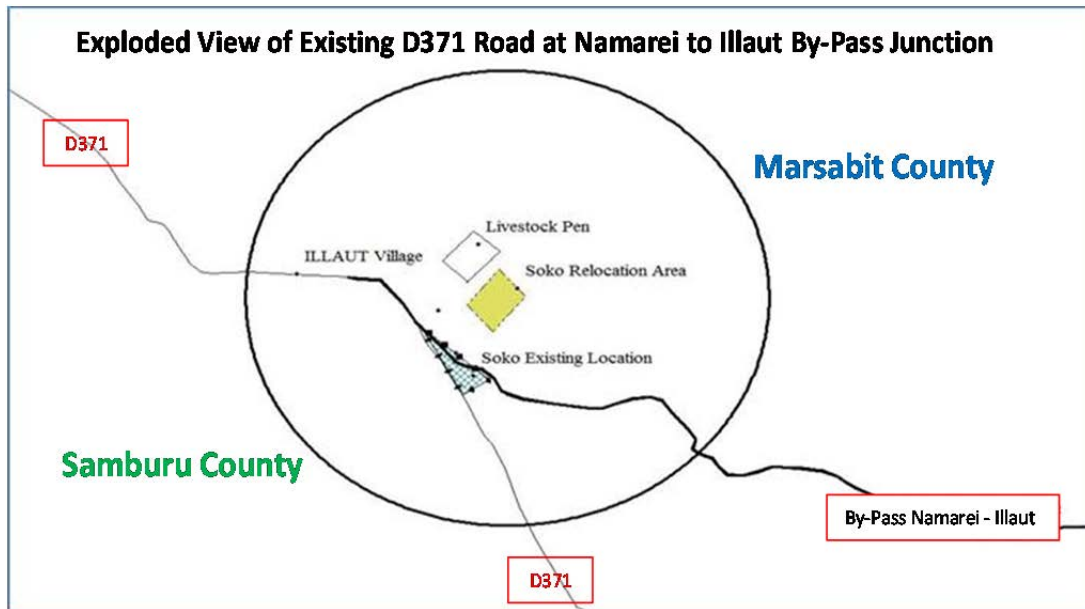


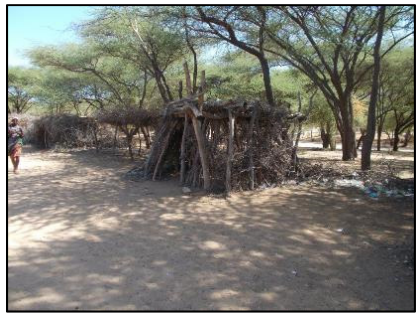
Figure 7: Illaut Market Relocation Area

The picture below portrays the new Soko location area that will be adjacent to the existing livestock corral, northward from the bypass route and dry Lagga.



Picture: New Soko Location

The pictures below portray the various types of makeshift market trader's stick construction stalls, commodity holding bins\ shelter and bartering venues.



2.11. Budget

With the imminent date of financial closure, revised budgets for the pre-mobilisation activities were submitted and approved by the equity Sponsors. See updated approved budget below.

REVISED BUDGET/EXPENDITURE				
<i>Location</i>	<i>Cost Items</i>	<i>Budgeted Amount (KES)</i>	<i>Actual Expenditure (KES)</i>	<i>Variance (KES)</i>
Namarei	Loss of Income	338,000	338,000	-
	Structures	1,289,225	1,289,225	-
	Disturbance Allowance, 15%	193,384	193,384	-
	Community Benefit, 10% inflation for labour & materials		128,923	
	Sub-Total	1,820,609	1,949,531	128,922
Illaut	Loss of Income	1,050,000	1,050,000	
	Structures	9,632,680	10,032,680	
	Disturbance Allowance, 15%	1,444,902	1,504,902	
	Community Benefit, 10% inflation for labour&materials		1,003,268	
	Soko Market Re-generation		450,000	
	Sub-Total	12,127,582	14,040,850	1,913,268
	Total	13,948,191	15,990,381	2,042,190
	Contingency (10%)	1,394,819		
	Grand Total	15,343,010	15,990,381	647,371

2.12. Compensation Implementation Process and Schedule

Following approval of the revised budget, LTWP RAP team, in May 2014 commenced implementation of A-RAP activities.

Stakeholder engagement and consultation commenced with both of the communities at Namarei and Illaut. As part of the compensation option packages, LTWP arranged for a local bank representative to assist with the processing and opening of bank accounts for those individuals and community managed projects that did not have bank accounts.

Trustee and signatories were elected for the community projects compensation accounts and these trustees will also be the disbursement officers of these funds. Basic training was provided as to how individuals and community trustee could access and withdraw funds and how to best manage their respective accounts.

As part of the implementation process, LTWP's CLO and COO will oversee and ensure the payments and distribution of these funds is in compliance with LTWP's compensation procedures and those agreed with the communities.

The next step in the process was disclosure of individual's compensation packages to the various Vendors\ PAHs, trustees and options available. Vendors\ PAHs were informed that the options available were 'like-for-like' or cash payments.

The cash payment would be in two Steps:

Step I:

- Would entail an initial down payment of 70% of the FRC of all their structures which included a disturbance allowance of 15% per Kenyan compensation law;
- LTWP would also provide an additional 10% on top of FRC as a benefit for the delays in the project implementation schedule, possible increase in material and transport and general inflation increase;
- Following receipt and confirmation of the compensation the Vendors\ PAHs bank accounts the directly affected structure within the road reserve must be removed within 90-days;
- Vendors\ PAHs can salvage what materials they can and reuse them
- Following confirmation that the affected structures had been demolished and removed from the road reserve LTWP would pay the second payment of their individual compensation package.

Step II;

- The 30% balance of the FRC plus 15% disturbance allowance and additional 10% provided by LTWP would be paid into individual Vendors\ PAHs bank accounts.

Following initial payment, the CLO will visit each village and individual Vendor\ PAHs confirming received of payment and also confirm the same to LTWP RAP team for processing. The CLO will follow up, as minimum, once a month until the 90-day notice to vacate expires to see if there are any issue and or grievances arising from the initial payment and if so, will either try to resolve or notified the RAP Team for resolution.

LTWP as an alternative option offered 'Like-for-Like' project management to relocate, reconstruct the affected structures, in the agreed relocation area for and on behalf of any Vendor\ PAHs that selected this option.

When Vendors\ PAH confirmed that they understood the process and various options being offered agreements were signed. No Vendor\ PAH selected the 'Like-for-Like' option.

2.13. Payment process,

The initial (70%) payment was paid into the community and individual accounts of Vendors\ PAHs in July, 2014. The CLO undertook period checks to ensure that the structures within the road reserve were being relocated to their designated area and to see if any Vendor\ PAHs were having difficulty with relocation\ reconstructing their structures. The check and consultation confirmed that the process was going well and none of the Vendors\ PAHs required any remedial assistance. Please refer to Appendix 1, A-RAP Compensation Schedule detailing the individual compensation payments paid to the Vendors\ PAHs in two (2) instalments.

2.14. Demolition of Structures Confirmation

Demolition and relocation of the structures out of the road reserve has been confirmed by the CLO September, 2014 and the balance of the various compensation offers to the community and individual amounts i.e. Step 2, final compensation payment of 30% of the FRC has been paid into the respective bank accounts for Vendors\ PAHs and the community projects.

2.15. Auditing

Between 3 and 6 months from completion of RAP compensation activities an audit of the process will be undertaken by LTWP RAP Team and the findings provided to Lenders TSA to confirm compliance with the Project and Lenders requirements. TSA will prepare a report for Lenders consideration soonest thereafter. Should there be non-compliance LTWPs will work with TSA to resolve any negative matter\ non-compliance.

2.16. Stakeholder Disclosures going forward

A range of information will be produced by the ESH&S Manager to inform stakeholders of Project construction activities and its environmental and social performance, including a summary of how and when the results of stakeholder

engagement activities and grievance handling is reported back to affected communities and/or broader stakeholder groups. This information will include the following:

- Non-technical environmental and social assessment reports for local communities;
- Ad hoc reports / newsletters on the LTWP web site;
- Reports to Regulators (including the audit reports required by NEMA's certification of the ESIAs);
- Annual Monitoring Reports submitted to lenders; and
- LTWP's annual report / sustainability report etc.

LTWP's ESHS Manager, shall define a schedule for the preparation and dissemination of all formal disclosures and shall monitor performance against schedule and any negative feedback from stakeholders in regards to disclosure materials or content.

Section 3: Conclusions

The RAP, compensation process, is now completed the Vendors\ PAHs have received their individual compensation packages and the structures within the road reserve have now been relocated. The communities\ villages of Namarei and Illaut can now revert to a similar lifestyle.

The construction of the Sub-project, in general terms, will undoubtedly disrupt the villages and the communities along the agreed 200km realignment however; this will be of a temporary nature.

The communities along the rehabilitated Project access road following construction will benefit from the Sub-project by employment, improved access and potential increase of travellers and tourism should at least sustain their livelihood at current levels with the potential to improve upon their current status.

LTWP will monitor and audit the RAP process for compliance and to ensure Vendors\PAHs are not worse from a social, financial standing than prior to the implementation of the RAP process.

LTWP will monitor the performance of the road contractor and project vehicles traversing through these villages and along the whole of the site access route once construction activities commence.

LTWP has imposed its environmental requirements within all Project contracts and articulated its Framework ESMP Standards for construction activities, setting expectations and goals in relation to public safety from construction plant and equipment traversing the rehabilitated wind-farm site access road including mitigation measures for the minimisation of nuisance impacts such as dust emissions and noise.

LTWP in accordance with its Community Health and Safety Management Plan, Stakeholder Engagement Plan and Transport and Laydown Management Plan will also provide traffic safety awareness seminars along the 200km access route targeting nearby schools and special attention will be given to the villages of Illaut and Namarei.

LTWP will enforce speed restriction for Project vehicles and the installation of warning signs to alert drivers of this sensitive area, at Ngurunit road junction, in the village of Illaut.

For the Vendors, LTWP will engage with these traders to see how best to provide business and financial training that will help improve their business acumen and ultimately their livelihood.

Appendices

- 1.) A-RAP Compensation Schedule
- 2.) Register of Community Engagements
- 3.) Grievance Redress Procedure
- 4.) Vulnerability Screening Process
- 5.) Structure Valuation Methodology \ Examples
- 6.) Entitlement Matrix
- 7.) Relocation & Reconstruction of Business Structures

Reference Documents

- 8.) Framework ESMP
- 9.) Community Health and Safety Management Plan
- 10.) Stakeholder Engagement Plan, and
- 11.) Transport and Laydown Management Plans

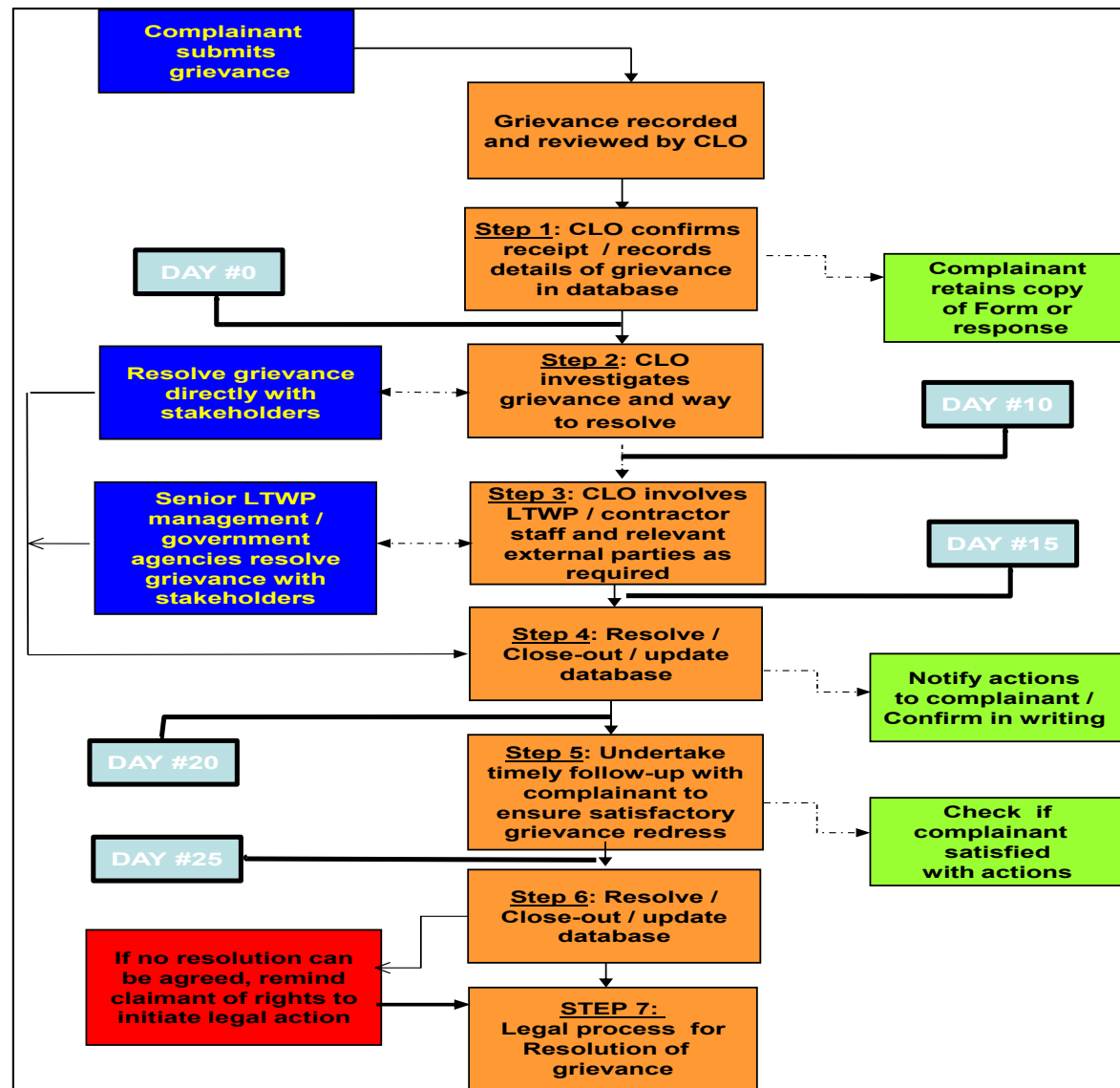
1.) A-RAP Compensation Schedule

A-RAP-ROADS COMPENSATION SCHEDULE FOR AFFECTED STRUCTURES									DATE: 30/Jul/14	
No.	A-RAP for Roads UNIQUE REF NO	Affected Area/Village	Total Estimated Compensation Value For Structures, KES	15% Disturbance Allowance [DA], KES	10% Increase To Cover Labour And Material Costs Inflation, KES	Loss Of Income Allowance [LoI], KES	Total Compensation Uplift [15%, 10% and LoI], KES	100% Subtotal Compensation [Loss of Income, 15%DA and 10% Inflation]	1st payment 70% Subtotal Compensation [Loss of Income, 15%DA and 10% Inflation]	2nd payment 30% Subtotal Compensation [Loss of Income, 15%DA and 10% Inflation]
1	A-RAP-Roads-001	Namarei	164,245.00	24,636.75	16,424.50	60,000.00	101,061.25	265,306.25	185,714.38	79,591.88
2	A-RAP-Roads-002	Namarei	142,470.00	21,370.50	14,247.00	80,000.00	115,617.50	258,087.50	180,661.25	77,426.25
3	A-RAP-Roads-003	Namarei	216,090.00	32,413.50	21,609.00	100,000.00	154,022.50	370,112.50	259,078.75	111,033.75
4	A-RAP-Roads-004	Namarei	104,690.00	15,703.50	10,469.00	58,000.00	84,172.50	188,862.50	132,203.75	56,658.75
5	A-RAP-Roads-005	Namarei	119,075.00	17,861.25	11,907.50		29,768.75	148,843.75	104,190.63	44,653.13
6	A-RAP-Roads-006	Namarei	107,445.00	16,116.75	10,744.50		26,861.25	134,306.25	94,014.38	40,291.88
7	A-RAP-Roads-007	Namarei	127,800.00	19,170.00	12,780.00		31,950.00	159,750.00	111,825.00	47,925.00
8	A-RAP-Roads-008	Namarei	115,710.00	17,356.50	11,571.00	40,000.00	68,927.50	184,637.50	129,246.25	55,391.25
9	A-RAP-Roads-009	Namarei	191,700.00	28,755.00	19,170.00		47,925.00	239,625.00	167,737.50	71,887.50
10	A-RAP-Roads-0010	Illaut	498,950.00	74,842.50	49,895.00	300,000.00	424,737.50	923,687.50	646,581.25	277,106.25
11	A-RAP-Roads-0011	Illaut	105,080.00	15,762.00	10,508.00	70,000.00	96,270.00	201,350.00	140,945.00	60,405.00
12	A-RAP-Roads-0012	Illaut	96,560.00	14,484.00	9,656.00	50,000.00	74,140.00	170,700.00	119,490.00	51,210.00
13	A-RAP-Roads-0013	Illaut	93,010.00	13,951.50	9,301.00	50,000.00	73,252.50	166,262.50	116,383.75	49,878.75
14	A-RAP-Roads-0014	Illaut	57,000.00	8,550.00	5,700.00	40,000.00	54,250.00	111,250.00	77,875.00	33,375.00
15	A-RAP-Roads-0015	Illaut	115,730.00	17,359.50	11,573.00	40,000.00	68,932.50	184,662.50	129,263.75	55,398.75
16	A-RAP-Roads-0016	Illaut	2,054,675.00	308,201.25	205,467.50		513,668.75	2,568,343.75	1,797,840.63	770,503.13
17	A-RAP-Roads-0017	Illaut	1,237,825.00	185,673.75	123,782.50	100,000.00	409,456.25	1,647,281.25	1,153,096.88	494,184.38
18	A-RAP-Roads-0018	Illaut	2,161,125.00	324,168.75	216,112.50	400,000.00	940,281.25	3,101,406.25	2,170,984.38	930,421.88
19	A-RAP-Roads-0019	Illaut	1,884,700.00	282,705.00	188,470.00		471,175.00	2,355,875.00	1,649,112.50	706,762.50
20	A-RAP-Roads-0020	Illaut	1,328,025.00	199,203.75	132,802.50		332,006.25	1,660,031.25	1,162,021.88	498,009.38
21	A-RAP-Roads-0021	Illaut	400,000.00	60,000.00	40,000.00		100,000.00	500,000.00	350,000.00	150,000.00
22	A-RAP-Roads-Illaut Community Benefit	Illaut						450,000.00	450,000.00	0.00
TOTALS			11,321,905.00	1,698,285.75	1,132,190.50	1,388,000.00	4,218,476.25	15,990,381.25	11,328,266.88	4,662,114.38

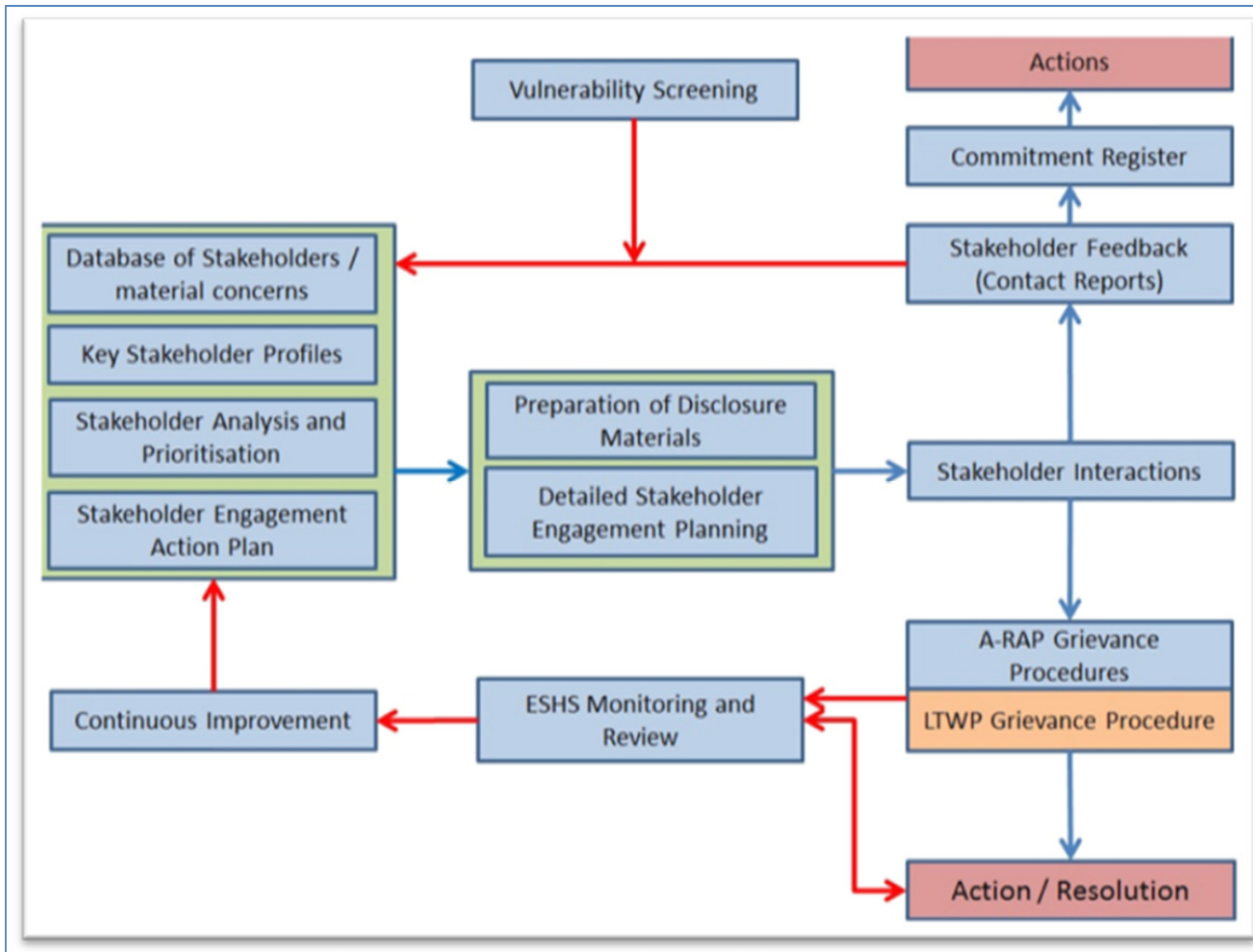
2.) A-RAP Roads Stakeholder Engagement Register

LTWP STAKEHOLDER ENGAGEMENT ACTIVITIES						
No	Date	Place	Stakeholder Engagement Reason/Activity	Participants	Minutes/ Documentation Taken YES/NO	Name of MoM File/location
1	22 March 2012	Illaut and Namarei villages	Sensitisation of community on the road rehabilitation project to be undertaken. Carrying out a census of the villagers	LTWP, Community Health Worker and villagers	Yes	Executive summary for Sensitisation and census
2	Jun-12	Illaut and Namarei villages	Structure valuation	Log associates		
3	08 August 2012	Illaut	Grievance resolution on payment for community structure. Mapping directions to move for beneficiaries.	LTWP, Chiefs and villagers	Yes	Mapping moving directions for beneficiaries
4	16 August 2013	Illaut and Namarei villages	Grievance redress and collection of bank details for structure owners	LTWP, Area chief and structure owners	Yes	Grievance redress and collection of bank details
5	23 December 2013	Illaut	Obtaining list of structure owners for the SOKO	LTWP, Chiefs and structure owners		List of Soko structure owners
6	30 January 2014	Illaut	SOKO market relocation, Structure omission reenumeration and collection of bank details.	LTWP, Area chief and SOKO owners	Yes	Bank details for structure owners
8	27 May 2014	Namarei village	Structure Compensation Offer Letters, Socio-Economic Enumeration	LTWP, Area chief, PAPs	Yes	MoM disclosure offer letters
9	28 May 2014	Illaut village	Structure Compensation Offer Letters, Socio-Economic Enumeration	LTWP, Area chief, PAPs	Yes	MoM disclosure offer letters
10	12 June 2014	Illaut village	SOKO market grievance redress, delivery of bank details to SOKO owners	LTWP, Chief and SOKO owners		
11	11 July 2014	Illaut village	SOKO Community Benefit Compensation Payment Acknowledgement	LTWP, Area chiefs		
12	27 July 2014	Illaut village	SOKO market community benefit fund receipt and signing.	LTWP, Area chiefs	Yes	Soko community benefit fund receipt
13	31 July 2014	Illaut village	SOKO owners payment and signing of list	LTWP, Area chief and SOKO owners	Yes	Signed Acknowledgement of Receipt Illaut Soko Market Community Benefit
14	14 August 2014	Illaut and Namarei village	Demolition confirmation	Stakwell(CLO)		
15						

3.) LTWP Grievance Procedure



4.) LTWP's Vulnerability Screening Flow Diagram



5.) Structure Valuation Methodology and Calculations Examples

RAP URN	Affected Structure	Structure Comment	Area (M2) / Circumference (M)	Estimated Compensation Value, KES	15% Disturbance Allowance, KES	Estimated Compensation Value including 15% Disturbance Allowance, KES	Valuation Methodology	Valuation Calculations											TOTAL without 15%DA				
								Ironsheets	Timber	Transport	Finishes	Labour	Stones	Windows/Doors/Pool	Materials (Enkare)	Roofing	Pit + Embankments	Roof/Wall					
A-RAP-Roads-004	BUSINESS PREMISE	Shop cum bar building all made of corrugated iron sheet and cemented floor	11.02	104,690.00	15,703.50	120,393.50	Plinth area, cost of materials, cost of transport, level of effort in terms of finishing and general improvements, plus 15% disturbance allowance	19,000	12,100	15,000	46,590	12,000										104,690	
A-RAP-Roads-0010	BUSINESS PREMISE	Shop cum bar made of 12 Icorrugated iron sheet roof; cemented/rock wall; cemented floor & Iron sheet door	15.96	351,120.00	52,668.00	403,788.00	Plinth area, cost of materials, cost of transport, level of effort in terms of finishing and general improvements, plus 15% disturbance allowance	30,000	22,400	65,000	50,718	85,000	80,000	18,000									351,118
A-RAP-Roads-0010	Manyatta		11.8	83,780.00	12,567.00	96,347.00	circumference of the manyatta, cost of materials, cost of labour and lunch for people doing the construction, plus 15% disturbance allowance	32,100		1,730		26,165					23,785					83,780	
A-RAP-Roads-0010	Toilet	Toilet - 7 GCI roofed & wall; Cemented floor	1.83	64,050.00	9,607.50	73,657.50	Plinth area, cost of materials, cost of transport, level of effort in terms of finishing, depth of the toilet in feet, plus disturbance allowance			11,965	19,890	15,000						8,475	8,720			64,050	
A-RAP-Roads-0021	RESIDENTIAL PROPERTY	Corrugated iron sheets roof; cemented/rock walls cemented floor, windows/doors/pooles	20	400,000.00	60,000.00	460,000.00	Plinth area, cost of materials, cost of transport, level of effort in terms of finishing and general improvements, plus 15% disturbance allowance	33,000	25,500	72,800	57,200	100,100	91,000	20,400									400,000

6.) Entitlement Matrix

Entitlements	Application	Unit	Amount	Eligibility	Remarks
Land	Loss of land for business/residential structures	m2		n/a	The route/existing roads to be rehabilitated are public roads and therefore the affected land is designated as 'Trust Land' managed under the district administration for an on behalf of the community. Consequently, the Vendors/PAPs have customary rights of use to land that is not demarcated with restrictions for public use/ services. The Business/Commercial buildings are illegally located within the road reserve and therefore the Vendors occupying the road reserve are deemed squatters and as such have no recognisable legal right or claim to the land other than use and are therefore not eligible for land compensation. There is no entitlement by law to pay compensation for land as ownership resides with the Government and managed by the local County. Land for relocation of the affected structures has been amicably agreed with the local Administration and affected Vendor\ PAH on a 'Like-for-Like' basis. The location agreed is just out of the road reserve, either to the left or right of the bypass from where the affected structure was located, to a similar size area nearby. This land which the Vendors\ PAHs have relocated onto is also Trust land.
Business Structures	Loss of commercial and non-residential buildings	m2	Various	business structure owners	Based on an independent valuation of Full Replacement Costs (FRC) without depreciation. The amount paid is on a 'lump sum' basis including 15% disturbance allowance of FRC. The payment is made in two instalments: - 70% payment following the signing of the Compensation Package, - 30% payment either following or prior to the 90-days notice to vacate and/or confirmation of structure demolition and relocation.
Residential Structures	Loss of residential buildings	m2	Various	residential structure owners	Based on independent valuation of Full Replacement Costs (FRC) without depreciation paid as on a lump sum basis including 15% disturbance allowance The payment is done in two instalments: - 70% payment following the signing of the Compensation Package, - 30% payment following 90-days notice to vacate and/or confirmation of structure demolition and relocation.
Disturbance Allowance	Rehabilitation assistance for miscellaneous transition expenses due to relocation of structures	%	15%	structure owners	Disturbance Allowance of 15% of the Full Replacement Costs (FRC) is included by Kenyan Law. The amount is paid on the top of the Full Replacement Costs (FRC) for all structures.
Labour/materials/transport Inflation Allowance	Additional compensation paid by the LTWP as 'goodwill' to cover delay\ loss of opportunity, inflation associated with labour, material and transport cost increases.	%	10%	structure owners	LTWP has reviewed the initial FRV calculations and, as a goodwill jester, awarded an additional 10% on top of the compensation packages previous disclosed in the Draft A-RAP. This additional sum has two components: Component #1, takes account of delay since enumeration, award 5%. Component #2 considered labour/materials/transport to account for potential inflation\ increase costs, awarded 5%. Total increase 10% added to all individual compensation packages.
90-days Notice to Vacate (FRC)	Minimum relocation term for PAHs with residential and business structures to relocate their assets.	days	90	structure owners	Kenyan Law, business/ residential structure owners are entitled to a minimum of 90 days Notice to Vacate following an negotiated and agreed (Compensation Package) signing.

Entitlements	Application	Unit	Amount	Eligibility	Remarks
Loss of Income	Loss of income for transacting businesses	lump sum	14	transacting businesses	There are 14 structures that are categorised as Business Premises. The consultant at the time of the initial survey could not verify the income claims asserted by the affected business as there was no documentation to substantiate their claims. Stock assessment also did not add any clarity or given confirm to the figures being provided. The Consultant therefore negotiated and agreed a sum with each of the Vendors. The agreed amounts to #1 month of the agreed income for the various business affected.
Livelihood restoration	Various	PAHs	Restoration measures are additional to compensation	transacting businesses	Of the 14 business #3 admitted that they had not been transacting for some time but hoped with the advent of the project they would be able to start transacting again.
Community Assets	Loss of community assets i.e. community store in Namarei and Administrative office/store in Illaut are affected	n/a	2	Community	There are #2 community stores containing a variety of products and equipment used for general community projects. These project are usually initiated by the Village Chief and or at times some NGO's get involved in local project and the leftover materials are stored in these structures.
Business training	improve business/financial skills for affected PAHs/vendors	n/a	n/a	Vendors\ PAHs\ Community	LTWP will provide business and financial training following post relocation audit. No later than 6 months after relocation.
Employment opportunities	for affected PAHs/vendors/family members	n/a	n/a	Open to all	LTWP will offer employment opportunities to local communities in the area. LTWP has an employment office in Karungu where the interested parties can submit their interest\ CVs.
Soko Market kiosks relocation	Relocation of market stalls to new location	lump sum	450,000	Soko market kiosk owners	LTWP has agreed and signed an agreement with the Illaut community to pay a lump sum of 450,000KES to the community to relocate SOKO market stalls to a new location on the other side of the Illaut by-pass as compensation for the labour involved.
Vulnerability	Assistance to relocate structures, to support livelihood restoration	PAH	1	Vendors\ PAHs deemed to be vulnerable as per RAP\ RPF criteria	LTWP has offered assistance to oversee/ manage the relocation of Vendors\ PAHs structures and to provide business training support to help with livelihood restoration. LTWPs assistance was declined by all Vendors\ PAHs as they preferred cash compensation and would manage their own relocation and affairs. From a vulnerability perspective there is a female head of household who would fall within the vulnerability criteria and thus she would qualify for additional assistance. PAH decline the offer.

7.) Compensation Compliance Q & A

Sequence	A-RAP for Roads UNIQUE REF NO	Affected Village	PAH requires assistance YES/NO	Compensation Package Compliance Questions:				
				a) do you have alternative host land to resettle/relocate? YES/NO	b) you have been informed about various compensation options other than cash including resettlement alternatives/assistance YES/NO	c) you have been informed and agree that from receipt of the compensation package(s) offered that you have 90-days in which to vacate/relocate your assets YES/NO	d) I/we have accepted/selected cash compensation as the preferred option YES/NO	e) do you agree that you have been offered a fair and equitable resettlement package? YES/NO
1	A-RAP-Roads-001	Namarei	NO	YES	YES	YES	YES	YES
2	A-RAP-Roads-002	Namarei	NO	YES	YES	YES	YES	YES
3	A-RAP-Roads-003	Namarei	NO	YES	YES	YES	YES	YES
4	A-RAP-Roads-004	Namarei	NO	YES	YES	YES	YES	YES
5	A-RAP-Roads-005	Namarei	NO	YES	YES	YES	YES	YES
6	A-RAP-Roads-006	Namarei	NO	YES	YES	YES	YES	YES
7	A-RAP-Roads-007	Namarei	NO	YES	YES	YES	YES	YES
8	A-RAP-Roads-008	Namarei	NO	YES	YES	YES	YES	YES
9	A-RAP-Roads-009	Namarei	NO	YES	YES	YES	YES	YES
10	A-RAP-Roads-0010	Illaut	NO	YES	YES	YES	YES	YES
11	A-RAP-Roads-0011	Illaut	NO	YES	YES	YES	YES	YES
12	A-RAP-Roads-0012	Illaut	NO	YES	YES	YES	YES	YES
13	A-RAP-Roads-0013	Illaut	NO	YES	YES	YES	YES	YES
14	A-RAP-Roads-0014	Illaut	NO	YES	YES	YES	YES	YES
15	A-RAP-Roads-0015	Illaut	NO	YES	YES	YES	YES	YES
16	A-RAP-Roads-0016	Illaut	NO	YES	YES	YES	YES	YES
17	A-RAP-Roads-0017	Illaut	NO	YES	YES	YES	YES	YES
18	A-RAP-Roads-0018	Illaut	NO	YES	YES	YES	YES	YES
19	A-RAP-Roads-0019	Illaut	NO	YES	YES	YES	YES	YES
20	A-RAP-Roads-0020	Illaut	NO	YES	YES	YES	YES	YES
21	A-RAP-Roads-0021	Illaut	NO	YES	YES	YES	YES	YES

8.) Impact Table - Structures

Sequence	A-RAP for Roads UNIQUE REF NO	Affected Village	STRUCTURE EXIST YES/NO	Number of Affected Structures	WHAT IS THE NATURE OF AFFECTED PROPERTY?	IF BUSINESS, WHAT IS THE NATURE?	Type of Structures Affected									Land ownership status
							14	5	2	7	5	5	7	1		
				47			Number of Business Premises Affected	Number or Residential Structures Affected	Number of Community Facilities Affected	Number of Kitchens Affected	Number of Animal Units Affected	Number of Sanitary Facilities Affected	Other Residential Structures Affected	Extra Business Structures Premises Affected		
1	A-RAP-Roads-001	Namarei	YES	2	Business	Shop	1			1					Trust land	
2	A-RAP-Roads-002	Namarei	YES	2	Business	Shop	1			1					Trust land	
3	A-RAP-Roads-003	Namarei	YES	3	Business	Shop	1			1			1		Trust land	
4	A-RAP-Roads-004	Namarei	YES	1	Business	Shop	1								Trust land	
5	A-RAP-Roads-005	Namarei	YES	3	Residential			1			1		1		Trust land	
6	A-RAP-Roads-006	Namarei	YES	1	Business	Shop	1								Trust land	
7	A-RAP-Roads-007	Namarei	YES	1	Residential			1							Trust land	
8	A-RAP-Roads-008	Namarei	YES	1	Business	Shop	1								Trust land	
9	A-RAP-Roads-009	Namarei	YES	1	Community Project				1						Trust land	
10	A-RAP-Roads-0010	Illaut	YES	3	Business	Shop	1					1	1		Trust land	
11	A-RAP-Roads-0011	Illaut	YES	1	Business	Hotel	1								Trust land	
12	A-RAP-Roads-0012	Illaut	YES	1	Business	Hotel	1								Trust land	
13	A-RAP-Roads-0013	Illaut	YES	1	Business	Hotel	1								Trust land	
14	A-RAP-Roads-0014	Illaut	YES	1	Business	Barber	1								Trust land	
15	A-RAP-Roads-0015	Illaut	YES	1	Business	Hotel	1								Trust land	
16	A-RAP-Roads-0016	Illaut	YES	1	Residential			1							Trust land	
17	A-RAP-Roads-0017	Illaut	YES	3	Residential			1	1			1			Trust land	
18	A-RAP-Roads-0018	Illaut	YES	10	Business	Hotel	1			2	3	1	2	1	Trust land	
19	A-RAP-Roads-0019	Illaut	YES	3	Community Project				1			1	1		Trust land	
20	A-RAP-Roads-0020	Illaut	YES	6	Business	Shop	1	1		1	1	1	1		Trust land	
21	A-RAP-Roads-0021	Illaut	YES	1	Residential				1						Trust land	

Categorisation of directly and indirectly/ associated structures

9.) Impact Table - Households\ PAPs\ Affiliations

Sequence	A-RAP for Roads UNIQUE REF NO	Affected Village	HH Members			Vulnerable PAH YES/NO	Community Affiliations			
			Number of HH Members	Male Household Members	Female Household Members		Tribe	Clan	Religion 2012 SE	Religion of respondent 2014 SE
			128	56	72					
1	A-RAP-Roads-001	Namarei	4	1	3	NO	Rendile	Ongeli	Catholic	Catholic
2	A-RAP-Roads-002	Namarei	8	4	4	NO	Rendile		Catholic	AIC
3	A-RAP-Roads-003	Namarei	9	5	4	NO	Rendile	Tubsha	Catholic	Traditionalist
4	A-RAP-Roads-004	Namarei	8	2	6	NO	Rendile	Ongeli	None	Traditionalist
5	A-RAP-Roads-005	Namarei	0	0	0	NO			Catholic	
6	A-RAP-Roads-006	Namarei	7	2	5	NO	Rendile	Ongeli	Catholic	Traditionalist
7	A-RAP-Roads-007	Namarei	8	3	5	NO	Rendile	Rongumo	Catholic	Muslim
8	A-RAP-Roads-008	Namarei	14	7	7	NO	Rendile	Ongeli	Catholic	Traditionalist
9	A-RAP-Roads-009	Namarei	0	0	0	NO			None	
10	A-RAP-Roads-0010	Illaut	10	5	5	NO	Rendile	Nahgan	None	Protestant
11	A-RAP-Roads-0011	Illaut	1	1	0	NO	Samburu	Lorokuchu	None	Traditionalist
12	A-RAP-Roads-0012	Illaut	12	7	5	NO	Rendile	Ongeli	None	Catholic
13	A-RAP-Roads-0013	Illaut	8	2	6	NO	Samburu	Mosola	Catholic	Catholic
14	A-RAP-Roads-0014	Illaut	3	1	2	NO	Samburu	Nasula	Catholic	Catholic
15	A-RAP-Roads-0015	Illaut	8	3	5	NO	Samburu		Catholic	Catholic
16	A-RAP-Roads-0016	Illaut	9	3	6	NO	Samburu	Ongeli	Catholic	Catholic
17	A-RAP-Roads-0017	Illaut	7	3	4	NO	Somali	Isaak	Muslim	Muslim
18	A-RAP-Roads-0018	Illaut	0	0	0	NO			Muslim	
19	A-RAP-Roads-0019	Illaut	0	0	0	NO				Muslim
20	A-RAP-Roads-0020	Illaut	6	3	3	NO	Samburu	Loimusi		Catholic
21	A-RAP-Roads-0021	Illaut	6	4	2	NO	Rendile	Masula		Catholic

10.) Relocation & Reconstruction of Business Structures

