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# Stakeholder Engagement Plan

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## Abbreviations

AfDB	African Development Bank
A-RAP	Abbreviated Resettlement Action Plan
ATL	Aldwych Turkana Limited (Employer's Representative)
CAA	Civil Aviation Authority
CBO	Community Based Organisation
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility
EIB	European Investment Bank
EMCA	Environmental Management and Coordination Act
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESHS	Environmental, Social, Health and Safety
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FBO	Faith Based Organisation
FPIC	Free Prior Informed Consent
IAP2	International Association for Public Participation
IFC	International Finance Corporation
LTWP	Lake Turkana Wind Power Ltd.
NEMA	National Environmental Management Authority
NGO	Non-Governmental Organisation
NHA	National Highways Authority
NMK	National Museums of Kenya
OPIC	Overseas Private Investment Corporation
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
RRA	Rural Roads Authority
SEP	Stakeholder Engagement Plan
STD	Sexually Transmitted Disease
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
WRMA	Water Resource Management Authority

## 1. Introduction and Background

The Stakeholder Engagement Plan (SEP) is designed to ensure effective engagement with local communities and other key stakeholders throughout the remainder of the life cycle of Lake Turkana Wind Power Ltd's (LTWP's) wind farm development. This SEP builds on the previous engagement work in support of Project conceptualisation, feasibility studies, planning and impact assessment processes. Since this time, LTWP has maintained dialogue with the relevant regulators and locally affected communities and their representatives as well as non-government organisations (NGOs), community-based organisations (CBOs) and other interest groups. LTWP is committed to continuous engagement throughout the Project's construction and subsequent operations phases.

## 2. Objectives, Scope and Approach

### 2.1. Objectives

The broad objectives of this SEP are to:

- Describe the applicable regulatory and/or other requirements for disclosure, consultation and ongoing engagement with the Project's stakeholders;
- Identify and prioritise key stakeholder groups, focusing on Project directly affected local communities;
- Provide a transparent and inclusive strategy, action plan and timetable for disclosure of information, ensuring that engagement with each group is undertaken without any form of discrimination;
- Describe the processes for implementing stakeholder engagement and community liaison activities, including any special measures for engaging with vulnerable groups and integration of this SEP into LTWP's wider management systems;
- Establish an effective grievance mechanism, ensuring that stakeholders are properly informed of their rights and know how to communicate their concerns;
- Determine roles, responsibilities and training requirements;
- Define monitoring and reporting procedures; and
- Ensure continuous improvement.

### 2.2. Scope

This SEP is part of the suite of Management Plans developed for LTWP's Environmental and Social Management System (ESMS) and covers all Project activities that require engagement with local communities and other stakeholders; it does not address stakeholder engagement in relation to the associated Ketraco transmission line.

As the conceptualisation, feasibility studies, planning and Environmental and Social Impact Assessment (ESIA) stages of the wind farm (and road rehabilitation) development have already been completed, this Plan is being designed for future application to the Project's construction and later operations phases. The existing [Community Engagement Plan](#) is superseded by this document, which will be applied upon full mobilisation of ATL's (LTWP's Employers Representative, Aldwych Turkana Limited) Environmental, Social, Health and Safety (ESHS) team. However, stakeholder interactions and grievances during implementation of the two Abbreviated Resettlement Action Plans (A-RAP) will follow the guidelines and procedures set out in both A-RAP documents; this SEP's grievance procedure shall therefore operate in parallel with the A-RAP methodology until completion. All other stakeholder disclosure, consultation and engagement activities will be undertaken as described in this Plan – i.e. as soon as practicable following ESHS team mobilisation.

No detailed specific closure/decommissioning phase actions or monitoring are currently proposed, (see the [Framework Environmental and Social Management Plan \(ESMP\)](#)); LTWP/ATL shall develop a preliminary

closure and rehabilitation plan after approximately 15 years<sup>1</sup> (to ensure adequate financial planning for dismantling the facility), then prepare a definitive plan at least 18 months prior to the anticipated cessation of activities that takes due account of the need to address stakeholder engagement needs at that time.

### **2.3. Resources and Responsibilities**

The ATL General Manager has overall responsibility for ensuring the establishment and maintenance of good working relationships between LTWP and its diverse stakeholders. On a day-to-day basis, general responsibility is discharged by each individual manager and member of staff (and external public relations advisers) during the normal course of their duties and routine dealings with business partners, contractors, suppliers, government agencies and officials. More specifically, the RAP team (as a sub-set of the ATL ESHS team; see organisation chart in the [Framework ESMP](#)) is responsible for engagement with affected communities during the implementation and monitoring of the resettlement and livelihood restoration processes as defined in the [Road Rehabilitation A-RAP](#) and the [Sirima Village A-RAP](#).

Upon mobilisation of the ESHS team, the ESHS Manager will oversee the Community Liaison Officer (CLO) and has responsibility for communicating the stakeholder engagement strategy internally and for the integration of team activities with other core business functions (i.e. ESHS including RAP aspects, Human Resources and Security), including the Project Management Contractor and contractors in any of their dealings with local communities and their representatives. The CLO will be devoted to managing and implementing LTWP's stakeholder engagement programme, including screening of vulnerable individual stakeholders / stakeholder groups. The CLO's duties, as part of the ESHS team's responsibilities are defined throughout this document, while the budget is specified in the separate document detailing the expected ESHS team's overall costs and expenditure. As appropriate the CLO will be supported by the ESHS Manager, the T-Line Oversight Manager / Resettlement Team Manager and other ATL ESHS/RAP staff. All communication with the communities will be channelled through the ATL CLO. Should contractors receive a communication directly, they should notify the LTWP CLO who will log and determine appropriate action as per the process. With regard to communications received directly by the ATL CLO, the ATL CLO will inform the contractors' community representatives of any issues they deem appropriate. The services of specialist stakeholder engagement practitioners (e.g. an NGO to provide HIV/AIDS community awareness training) and/or consultants may also be needed from time to time.

Irrespective of the experience and qualifications of the CLO, this SEP requires some initial awareness raising and skills training for the community relations, focusing on LTWP's Lenders requirements and the various methodologies being implemented as part of the wind farm's impact assessment/mitigation plans (e.g. in influx assessment, local hiring policy, vulnerability screening / human rights, community participatory monitoring programmes, disclosures and engagement planning /monitoring/ evaluation, grievance procedures and continuous improvement).

## **3. Regulatory and Other Requirements**

### **3.1. Kenya's Legislative Framework and Permitting**

Chapter Five, Land and Environment, of Kenya's Constitution recognises the right of citizens to participate in governance decisions that directly affect them, including consenting on natural resource issues and development projects. In addition, Article 10(2) (see below) sets out the principles and values for good governance, integrity, transparency and accountability and sustainable development. Article 31(3 and 4) (see box below) also includes the right to Privacy which is relevant to this SEP in regards to information relating to personal or private affairs and the protection of communications.

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<sup>1</sup> This timescale may change in the event that the Project life is either extended (e.g. by refurbishment and/or replacement of turbines) or cut short.

**Box 3.1: Kenyan Constitution:**

10.(2) *The national values and principles of governance include—*

- *patriotism, national unity, sharing and devolution of power, the rule of law, democracy and participation of the people;*
- *human dignity, equity, social justice, inclusiveness, equality, human rights, non-discrimination and protection of the marginalised;*
- *good governance, integrity, transparency and accountability; and*
- *sustainable development.*

31. *Every person has the right to privacy, which includes the right not to have—*

- *their person, home or property searched;*
- *their possessions seized;*
- *information relating to their family or private affairs unnecessarily required or revealed; or*
- *the privacy of their communications infringed.*

Under the Constitution, there is a variety of laws, regulations and orders that can have a bearing on stakeholder consultation and engagement. The most relevant include:

- Kenya Land Act 2012;
- Land Registration Act 2012;
- National Land Commission Act 2012 (in relation to resettlement / loss of assets);
- County Government Act 2012 (which allows citizens to petition for a referenda on planning and development decisions); and
- Environmental Management and Coordination Act (EMCA).

The EMCA and its supporting legislation set out requirements for public disclosure and consultation in tandem with the ESIA process, which was duly completed with the National Environment Management Authority's (NEMA's) approval of the 3 ESIA reports (wind farm, road upgrade and Ketraco's associated transmission line).

LTWP complied with the applicable legislation during the ESIA's, preparing community disclosure fact sheets, disseminating other information through barazas and other stakeholder meetings, and responding to concerns through official public meetings and the development of its policies, [Framework ESMP](#) and specific management plans.

### 3.2. LTWP's Policy Requirements

LTWP has defined its environmental and social policies for the wind farm and road rehabilitation ([see ESMS Manual](#)). The policies' objective #2 commits LTWP to managing "*the associated environmental and social risks and impacts in accordance with the principles of sustainable development, applicable legal requirements, relevant international standards and recognised good industry practice*".

LTWP recognises the business imperative of developing mutual respect and trust with its stakeholders, particularly local communities, and will *inter alia*:

- Treat our neighbours with respect, and dignity whilst taking due account of their views, traditions and cultural heritage;
- Gain and maintain broad community support for the Project, through informed consultation with its stakeholders on any issues that may have a material bearing on their cultural heritage, lives or

livelihoods, protecting community health and safety through raising awareness and minimising the potential for communicable or vector-borne diseases;

- Keep communities and other stakeholders materially informed of sustainability performance through periodic disclosures and on-going engagement activities; and
- Establish and implement an appropriate grievance mechanism for the effective handling and resolution of any concerns, complaints or grievances expressed by local communities or other external stakeholders in regards to the wind farm development and roads rehabilitation sub-project.

LTWP also intends that its engagement with stakeholders shall be consistent with international practice and has adopted the 2012 version of the International Finance Corporation (IFC) Performance Standards. This SEP is therefore intended to meet the requirements for such activities as described in Performance Standard 1 - Assessment and Management of Environmental and Social Risks and Impacts. Further requirements for stakeholder consultation and engagement are included in the other Performance Standards and Guidance Notes (e.g. in relation to: community health safety and security; involuntary resettlement; ecosystem services; indigenous / vulnerable groups; and cultural heritage); those requirements are integrated into this Plan where applicable. LTWP's view is that the principle of Free Prior Informed Consent (FPIC) is not currently considered to be applicable to this Plan (i.e. FPIC requirements are only triggered when indigenous peoples are impacted adversely by the project and cannot be applied retrospectively to project consultation activities).

In addition to the criteria on stakeholder engagement contained in the aforementioned standards, this Plan draws upon the IFC guidelines set out in "*Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets*", May 2007.

### **3.3. International Lenders' Standards**

The project has accepted and will adhere to the requirements of specific lenders standards in addition to the 2012 IFC Performance Standards. Where differing levels of performance are detailed between the various standards, the most stringent requirement will be applied. As key lenders, LTWP will adopt the requirements defined in the respective standards of, the African Development Bank (AfDB), the EIB and the Overseas Private Investment Corporation (OPIC) as applicable. The following Lenders have some specific requirements:

#### **3.3.1 African Development Bank**

The AfDB represents the senior lender to the project. As such LTWP have adopted and incorporated AfDB Environmental and Social Policy, cross-cutting themes and 2013 Operational Safeguards as part of the Project's commitments.

#### **3.3.2 European Investment Bank**

As a major investor, the EIB wants its environmental and social principles and standards applied to the project. These are defined in the EIB E&S Principles and Standards, namely the EIB Statement on Environmental and Social Principles and Standards and Volume 1 of EIB's Environmental and Social Handbook which comprises the Bank's 10 E&S Standards. In particular, EIB Standards 7 and 10, respectively on Vulnerable Groups and Stakeholder Engagement, are of most relevance.

#### **3.3.3 Overseas Private Investment Corporation**

OPIC's Environmental and Social Policy Statement specifies application of the 2012 IFC Performance Standards and supporting Environmental, Health and Safety Guidelines. However, it is recognised that OPIC has a strong focus on human rights and that may warrant further attention in regard to transparency and access to information.

## 4. Previous Stakeholder Engagement and Community Liaison Activities

### 4.1. Overview

Stakeholder engagement at all levels has taken place throughout the seven year development of the LTWP Project, namely the wind farm and road rehabilitation sub-project, as well as support for the associated transmission line being built by Ketraco. LTWP has previously defined a [Community Engagement Policy](#), a [Community Engagement Plan](#) and [Community Disclosure documents](#). LTWP also hired two community liaison representatives, one based locally near the wind farm site and the other at South Horr, who are conversant with local dialects (Kiswahili, Turkana and Samburu) and knowledgeable on the interrelationships and conflicts between the tribes.

Formal public consultation took place during the ESIA of the wind farm, during the road rehabilitation ESIA study and has continued thereafter as the Project evolves. The following table outlines the stakeholder groups that were consulted and summarises how that consultation was undertaken:

**Table 4.1 Summary of Previous Formal Consultation Activity**

Stakeholder Group	Activities
<b>General Public (nationwide)</b>	As part of the initial stakeholder scoping engagement process, a notice was posted in the Daily National Newspaper (6 July 2009) and disclosure hand-outs were distributed during consultation activities. In line with community feedback, Project disclosure notices have since been updated to reflect the opinions of the community, development and design changes. Both these changes and the approved ESIA reports are available in LTWP's main office at: 5th Floor, Capitol Hill Towers, Cathedral Road, Nairobi.
<b>Various Government Agencies</b>	Meetings were held with various government agencies such as the Kenya Civil Aviation Authority (CAA), Kenya Rural Roads Authority (RRA) and Kenya National Highway Authority, etc. The ESIA's were submitted to the Kenyan environmental authority, the NEMA. The National Museums of Kenya Archaeology, Ornithology and Mammalogy Departments were involved in surveying the wind farm site. Note also that NEMA, during their review process, also sought review and feedback from other government specialists.
<b>NGOs (national and local)</b>	Numerous NGOs were identified; many attended the wind farm ESIA Stakeholder Workshop in April 2008, participated in the scoping pre-identification stakeholder consultation process (July 2009 – June 2010), and/or were consulted for specialised studies (e.g. Nature Kenya and the Royal Society for the Protection of Birds).
<b>Local Communities</b>	<p>Contact was made with County and Sub-County level administrative government offices to inform them of the Project. Public meetings / barazas were held with each of the communities in the Project vicinity to advise people of the Project and to receive their comments and concerns.</p> <p>Community engagement also took the form of both formal and informal consultations with directly and indirectly affected people and communities to varying degrees depending upon the audience and information being disclosed. Formal engagement included focused group discussions involving community members and other stakeholders, and key informant interviews involving opinion leaders and experts.</p> <p>Informal 'meeting and greeting' of local leaders and community members during the frequent site visits were also undertaken during the Project development and impact assessment process. A questionnaire was used in 2010 to help understand the Sirima nomadic settlement.</p> <p>All of the above formal, ad hoc informal, indirect and direct engagements were recorded and analysed. Based on the collective feedback, LTWP considered the concerns and expectations raised by local communities during the design and decision-making process, and presented suitable alternatives or mitigation in order to ensure an equitable solution both for the</p>

	communities and the Project. The LTWP/ATL RAP Team continues and maintains a log of community engagement, which will continue through the life of the Project.
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In 2009, additional consultation was undertaken both in relation to the Clean Development Mechanism (2009 in regard to carbon credits) and as an integral key part of the scoping and pre-identification of the proposed ‘Winds of Change’ Programme, LTWP’s Corporate Social Responsibility (CSR) vehicle.

## **4.2. Conclusions and Recommendations from ESIA and Supporting A-RAPs**

### **4.2.1. Wind Farm**

#### **4.2.1.1. ESIA Report**

The ESIA team carried out public consultations with the local community with the main objective of getting stakeholders’ views on the perceived social effects of the wind farm and their ideas on how the negative impacts can be mitigated / remedied. In this regard, the consulting team held several meetings with a wide range of stakeholders as discussed in Chapter 3 - Approach and Methodology of the (updated) [Wind Farm ESIA](#) and a list of all stakeholders consulted is also included in that document.

The ESIA (section 8.2.2) concluded that the local population was very positive about the wind farm but warned that there were very high expectations among the local communities, within the Project area of influence, despite a certain “fear of unknown”. This latter was ascribed to the facts that the development is without precedent in the Project footprint, the local community is still very traditional (nomadic / transhumance pastoralists but becoming increasingly sedentary due to a range of pressures) and suffers from lack of exposure to what is happening to the rest of the country and beyond.

#### **4.2.1.2. Sirima Settlement A-RAP**

Following the agreement to relocate the Sirima settlement away from the main C77 road that traverses the site (on health and safety grounds), LTWP developed a Resettlement Policy Framework (RfP) to ensure safeguards are in place to address and mitigate against potential adverse effects associated with involuntary land acquisition and resettlement, which included consultation with the Sirima community. Formal meetings to discuss the Project and its proposed relocation of the Sirima settlement were held at the Project site, and feedback from participants was recorded in a register. In addition, a culturally appropriate two-way systematic approach to community engagement was adopted.

The [Sirima Village A-RAP](#) identified the potential loss of grazing land as the community’s key concern and LTWP’s main concern was the safety of that community, especially children, and their livestock. To mitigate this concern, LTWP and the Sirima community agreed that their settlement would relocate to an area away from the C77 road and main construction areas, on condition, that LTWP agreed the only areas to be fenced were the HV switchyard, individual transformers and LTWP’s operations village and suitable warning signage installed (i.e. to mitigate potential hazards to people and livestock and maintain security of the operations personnel). Grazing will be permitted in and around and between the clusters of turbines once the facility is operational so that the impact on the local community from the denial of land for grazing (due to the fenced areas and the turbines’ actual landtake) is considered by Sirima community to be ‘insignificant’, assistance to relocate and potable water to be provided at the new host location and that members of the community are considered for employment.

## 4.2.2. Road Rehabilitation

### 4.2.2.1 ESIA Report

During the original road rehabilitation ESIA, three settlements raised objections to the proposed routing of the access road upgrade. A revised route was proposed and agreed by these communities in which the re-aligned route would minimise the impact upon nearby settlements. The [Road Rehabilitation ESIA Addendum](#) states that, due to the agreement to the change of route, there was no need to conduct public meetings or administer another round of questionnaires. Nevertheless, discussions were held with key stakeholders where the re-alignment was planned to pass through their area of jurisdiction. The ESIA concluded that, although local communities were generally in favour of the road upgrade, the following concerns needed to be addressed:

- **Use locally available human resources:** Casual labourers should be sourced from the area the road traverses. Similarly, construction materials such as sand, aggregate and stones should be locally sourced;
- **Water resources:** The water wells in some of the sand river beds (especially at Illaut) are a valuable source of water to the community and their location is very close to the proposed road. It was considered imperative that LTWP avoids damage to these sensitive resources;
- **Deforestation:** Kenya Forest Service expressed concerns regarding the potential loss of trees used by some communities, like the Rendille, as water markers to indicate the presence of water. It is therefore necessary for LTWP to avoid destruction wherever practicable and liaise with local environmental groups to replace any unavoidable losses ; and
- **Loss of pasture:** The communities expressed concerns on the possibility of destruction of their grazing land and pastures for their animals during upgrading of the road. The contractor should ensure that clearing of vegetation should be kept to a minimum along the realignment, in the borrow pits locations, and that planting of grass is done immediately after the completion of works.

### 4.2.2.2 Road Rehabilitation A-RAP

A similar consultation process as that adopted for the Sirima village A-RAP was employed; however, the [Road Rehabilitation A-RAP](#) states that stakeholders' sentiments were generally favourable to the Project but does not specifically list any key concerns other than a general request for information about compensation.

### 4.3. Summary of Stakeholder Concerns to Date

Topic / Issue	Stakeholder Concerns	LTWP's Comments and Actions
<b>Employment opportunities</b>	<ul style="list-style-type: none"> <li>• Very high expectations of employment.</li> <li>• However job opportunities are predicted to be fewer for local affected stakeholders as they generally have less education, skills and training.</li> </ul>	<ul style="list-style-type: none"> <li>• LTWP and contractors committed to employment of local people, but will need to manage unrealistic expectations.</li> <li>• Establishment of Recruitment Office at Karungu to register potential candidates.</li> <li>• LTWP to monitor number of locals employed by Project.</li> <li>• See <a href="#">Labour Management Plan</a>.</li> </ul>
<b>Training opportunities</b>	<ul style="list-style-type: none"> <li>• Implicit desire of affected people for training to develop new / existing skills needed for employment or to support entrepreneurial ambitions.</li> </ul>	<ul style="list-style-type: none"> <li>• The nature and timescale of construction works and the small operations phase workforce means that there is only very limited scope for any substantial skills training.</li> <li>• No skills training programme is planned.</li> </ul>
<b>Education opportunities</b>	<ul style="list-style-type: none"> <li>• Implicit desire of affected people to receive education / support for children as compensation for loss of pastureland as a result of the Project.</li> </ul>	<ul style="list-style-type: none"> <li>• As for training, the Project has little scope for direct interventions in education provision (LTWP will construct a classroom in the Sirima relocation village).</li> </ul>
<b>Health and safety</b>	<ul style="list-style-type: none"> <li>• Traffic accidents involving humans and livestock are a concern because the access road used by the Project passes through/near a number of communities and there will be a high volume of heavy goods vehicles carrying materials and equipment plus workforce transport during the 36 month construction period.</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive prior consultation and further planned engagement on the road rehabilitation component and traffic safety.</li> <li>• Realignment of road upgrade route avoided communities (only villages on the D371 bypass route are Namarei and Illaut which is part of the existing road network).</li> <li>• Elaboration of the <a href="#">Transport Management Plan</a> and liaison with relevant public roads authorities.</li> <li>• Installation of temporary / permanent road warning signage.</li> <li>• Stakeholder grievance mechanism to address complaints.</li> </ul>
<b>Land acquisition and resettlement / loss of livelihood</b>	<ul style="list-style-type: none"> <li>• Uncertainty due to changes to homes, businesses and lands – e.g. replacement of assets; compensation levels may not be sufficient to meet actual costs; etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Avoidance and minimisation of land take.</li> <li>• Definition and implementation of A-RAPs in accordance with international standards.</li> <li>• Rehabilitation / passive re-vegetation of disturbed areas (seed bank / nursery / possible offset).</li> <li>• Participative monitoring of pasture quality within Project Area.</li> <li>• Stakeholder grievance mechanism to address complaints.</li> </ul>
<b>Local economic stimulation and business development</b>	<ul style="list-style-type: none"> <li>• Potential local service providers (e.g. Lake fishermen) could be keen to participate in providing services to LTWP and its contractors, but lack information on how to adjust their businesses to meet new needs.</li> </ul>	<ul style="list-style-type: none"> <li>• LTWP committed to stimulating business and ensuring local content in procurement activities where practicable, but may need to manage any unrealistic expectations (LTWP will build a community shop/ store in the Sirima</li> </ul>

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	<ul style="list-style-type: none"> <li>Local entrepreneurs may want support (e.g. capacity building, access to microfinance and order commitments) to develop and sustain their businesses.</li> <li>Local/regional entrepreneurs / businesses have limited understanding about meeting the high standards required by LTWP and need to know how they can become suppliers.</li> </ul>	<p>relocation village and provide the initial stock for management by the community, thus promoting sustainability).</p> <ul style="list-style-type: none"> <li>Consider entrepreneurial proposals as part of CSR.</li> <li>Consideration of range of measures to facilitate local procurement/ services – see <a href="#">Influx Management Plan</a>.</li> </ul>
<b>Environmental nuisance impacts</b>	<ul style="list-style-type: none"> <li>Dust and noise impacts, particularly along the main road corridor, are of concern to herders and other residents.</li> <li>Environmental degradation and noise disturbance during road construction and use. Loss and change of vegetation due to soil degradation.</li> <li>Increased abusive waste near construction sites and Project facilities.</li> </ul>	<ul style="list-style-type: none"> <li>Implementation and enforcement of range of environmental management measures to deal with nuisance impacts, including noise and dust monitoring.</li> <li>Participative community monitoring of dusts along the road rehabilitation route.</li> <li>Stakeholder grievance mechanism.</li> </ul>
<b>Access to water / water quality</b>	<ul style="list-style-type: none"> <li>Increased demand for water which is already in scarce supply due to introduction of Project workforce and possibly other in-migrants.</li> <li>Loss of wells during road construction.</li> </ul>	<ul style="list-style-type: none"> <li>Implementation and enforcement of range of environmental management measures to deal with protection and conservation of water resources.</li> <li>Participative community monitoring of water resources.</li> <li>Stakeholder grievance mechanism.</li> </ul>
<b>Loss of ecosystem services (pasture and trees)</b>	<ul style="list-style-type: none"> <li>Nomadic and other herders are worried about having to reduce livestock due to decreasing pasture and therefore loss of income and effects on their livelihood.</li> <li>Roads will also divide pastures and disturb ground and livestock. This may affect their livelihoods and income.</li> <li>Competition between herders for pasture and water has already increased in the Project's area of influence and beyond.</li> </ul>	<ul style="list-style-type: none"> <li>Rehabilitation / passive re-vegetation of disturbed areas (seed bank / nursery).</li> <li>Participative monitoring of pasture quality by nomadic communities within wind farm area.</li> <li>Potential need to re-vegetate during decommissioning rehabilitation (pasture and trees)</li> </ul>
<b>Biodiversity and protected areas</b>	<ul style="list-style-type: none"> <li>Preservation of the nearby Lake Turkana World Heritage Site / National Parks, Mount Kulal Biosphere Reserve and other parks / forestry reserves etc along the transport route.</li> <li>Presence of endangered species (e.g. Grévy's zebra, Egyptian vulture, etc.) in Project area of influence.</li> <li>Potential for disturbance and spread of existing invasive alien species and introduction of further invasive species into fragile environment.</li> <li>Potential fatalities amongst resident and migratory avian fauna (especially raptors) and bats during wind farm operations.</li> </ul>	<ul style="list-style-type: none"> <li>Avoidance of direct impacts upon any protected areas.</li> <li>No hunting / fishing or bush trade activities by Project personnel.</li> <li>Implementation and enforcement of range of environmental management measures to protect flora and fauna and deal with invasive alien species.</li> <li>Commissioning of series of ornithological / bat surveys using established protocols for wind farm projects.</li> <li>Recording and investigation of any wildlife incidents, including bird / bat fatality monitoring during wind farm operations.</li> </ul>
<b>Protection of cultural heritage</b>	<ul style="list-style-type: none"> <li>Protection of any historically significant heritage (proximity to 'cradle of mankind'), traditional ways of life and the diffusion of cultures alien to local</li> </ul>	<ul style="list-style-type: none"> <li>Consultation with communities and National Museums of Kenya (NMK) on any concerns.</li> <li>Definition and implementation of robust</li> </ul>

## STAKEHOLDER ENGAGEMENT PLAN

	ethnic identities in the Lake Turkana area.	<a href="#">Chance Finds Procedure</a> in accordance with international standards.
<b>Local and national government</b>	<ul style="list-style-type: none"> <li>• Energy/power supply (rural electrification) within Marsabit and neighbouring Counties.</li> <li>• Authorities' expectations that secondary businesses will be encouraged /supported by LTWP.</li> <li>• Employment expectations are high locally and may be of critical importance to local government.</li> <li>• Anticipated increased pressure on public services and expectations of new revenues to help with infrastructure and service improvements.</li> <li>• Possibility of in-migration to the area, which may generate spontaneous development and cause civil strife, health problems, etc. Wider area already subject to social conflict over water, pasturage and fisheries.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing consultation and liaison with relevant ministries and other organisations across multiple subjects</li> <li>• LTWP committed to stimulate the local economy and endeavour to utilise local content in procurement activities where possible, but may need to manage any unrealistic expectations.</li> <li>• Involvement local and national government agencies in the CSR Winds of Change Foundation.</li> <li>• Development and implementation of <a href="#">Influx Management Plan</a>, <a href="#">Security Management Plan</a>.</li> </ul>

## 5. Stakeholder Identification and Mapping

### 5.1. Previous Methodology

From the outset, LTWP has actively sought to build strategic working relationships with the various stakeholders who are directly or indirectly impacted by and/or who have interests in its wind farm Project. The means of identifying Project-wide stakeholders was originally defined during the range of consultation activities described in Section 4 above by LTWP management and its community liaison representatives. Various activities have been conducted since then to update stakeholder lists and build on LTWP's knowledge of its stakeholders and their concerns.

A comprehensive list of stakeholders and database has been developed from this process and a stakeholder register is being maintained by LTWP. However, LTWP are committed to improving its stakeholder engagement methodology, integrating it within its management systems and meeting the international standards required by its Lenders. Consequently, LTWP is introducing the following changes to its methodology:

- Review of existing **stakeholder database** and identification records to include consideration of stakeholders' rights and/or duties as well as their capacity to engage meaningfully with LTWP (i.e. factors such as vulnerability, literacy, traditional lifestyle and decision-making via village elders, etc.). Records will be reviewed and updated to reflect any notable changes in stakeholder status or circumstances;
- A [Commitments Register](#) is introduced to collate and track all new environmental and social commitments made by LTWP to its various stakeholders over the life of the project and ensure timely follow-through on its promises. This is an essential tool for building trust and establishing good working relationships with stakeholders and will sit alongside the [Framework ESMP](#) and its Consolidated Register of ESIA Obligations;
- **Stakeholder categorisation** is being implemented, retrospectively and going forward, to facilitate the prioritisation of both "affected communities, groups and individuals" and "other interested parties" in order to ensure the effective of planned engagement and liaison activities. A **stakeholder mapping**

process is being added to help define appropriate levels and types of engagement required for each defined stakeholder category, facilitating due attention to vulnerable or marginalised groups;

- **Key Stakeholder Profiles** (see example format in Appendix A) will be maintained for both designated key informants and those affected parties which have influence or are subject to high impacts, the knowledge and legitimacy, and are capable and willing to engage with LTWP;
- A **Vulnerability Screening Checklist** (see Appendix D) to facilitate evaluation of capacity and identify any future change in status to facilitate a re-evaluation of mitigation assistance where essential;
- **Stakeholder Engagement / Community Liaison Planning Form** (see example format in Appendix B) introduced to ensure proper preparation of each event or activity, including consideration of range of practical issues, the potential risks associated and a culturally appropriate approach; and
- **Contact Reports** (see example in Appendix C) are being introduced to record all interactions with stakeholders, except for grievances which are recorded and processed as described in Section 8 below. This form will be completed by the CLO or any other ATL manager, employee or consultant undertaking stakeholder engagement activities. The stakeholder database will be updated with information from the Contact Reports to facilitate key word searches on specific topics, generate lists of target stakeholder groups and support the planning of engagement and liaison activities;

## 5.2. Stakeholder Categorisation

The various international standards being applied to this Project define two main categories of stakeholder; differentiating for example between “those who will be or are likely to be directly or indirectly affected, positively or negatively, by a project (commonly referred to as project-affected people, households or communities)” and “those who might have an interest in, or may influence the project”. Following this definition, the two principal groups of stakeholders in the LTWP Project are broadly categorised as follows:

**Affected Parties:** People/entities directly affected by the Project and/or have been identified as potentially vulnerable to change and who need to be engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Affected parties are generally located within the Project’s defined area of influence but may be elsewhere (e.g. people who live outside of Marsabit County but have personal or business interests that may be directly affected by the development of the wind farm). Affected parties include 2 sub-groups:

### **Directly affected:**

- Communities, groups and individuals displaced physically and/or economically by the Project, including any vulnerable or marginalised stakeholders.

### **Indirectly Affected:**

- Residents, businesses, officials and administrators in Marsabit County who may be indirectly affected by employment opportunities, influx and the related pressure on resources and services;
- Local community-based groups who represented affected groups and/or other affected parties; and
- Employees, their representatives and contractors to LTWP.

**Interested Parties:** Other Interested Parties: people/entities that are interested in the Project and/or could affect the Project in some way. Interested parties include inter alia:

- Residents of the adjacent divisions within the Turkana and Samburu Counties;
- National and international civil society, NGOs, CBOs or and faith-based organisations (FBOs);
- Suppliers and service providers to LTWP located elsewhere in Kenya or internationally;
- Other notable projects in the region;

- The Government of Kenya, including government officials, permitting and regulating agencies at the national and regional level;
- Politicians at national / regional / local levels;
- Lenders' to the Project; and
- Media, academics and other interest groups.

### **5.3. Stakeholder Mapping and Analysis**

A sound community relations approach to engagement with stakeholders builds on in-depth and structured analysis of stakeholders. It also allows LTWP to determine which stakeholder groups to prioritise within the stakeholder engagement / community relations strategy. For example influential stakeholders who are significantly impacted by the Project typically make good partners for LTWP to work with, while stakeholders with limited influence who are significantly impacted are best approached through an empowerment or rights protection perspectives, as they may not have the capacity to represent themselves properly.

Similarly interested parties can be a low priority for community relations efforts, but their capacity to exert high influence over the Project, means that they need to be kept informed and involved, while building strategies to reduce any inappropriate demands that they place on the Project.

ATL will continue to undertake analysis of its various stakeholder groups to identify any new stakeholders and determine/confirm the appropriate level and methods of consultation and engagement for each stakeholder group. The ESHS Manager and CLO will be responsible for ongoing stakeholder identification, mapping and analysis. The CLO is also responsible for updating the stakeholder database and matrix as well as creating/updating Key Stakeholder Profiles.

The analysis will involve mapping stakeholder using the following three key determinants:

- The stakeholder's projected level of interest in the Project;
- The Project's potential impact on the stakeholder; and
- The stakeholder's degree of influence / power on or value to the Project.

By plotting influence together with impact/interest on a matrix diagram as illustrated in Figure 5.1 and taking due account of further criteria such as expertise (i.e. knowledge to contribute and legitimacy) and the stakeholders' willingness to engage, the relative needs of key stakeholders in terms of the level and type of consultation and engagement are determined and can therefore be properly planned.

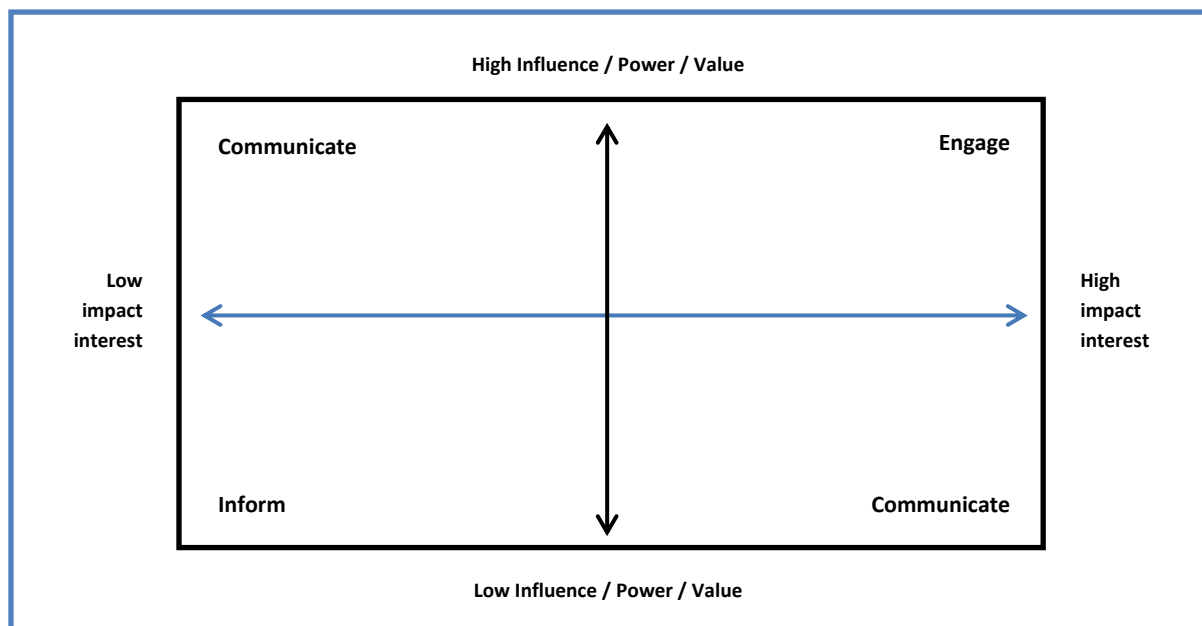


Figure 5.1: Stakeholder Matrix

The LTWP definitions of impact/interest and influence/power are described in the following table:

	Impact / Interest axis	Influence/Power axis
<b>High</b>	The stakeholder will experience a high degree of impact as a result of the Project (e.g. resettlement, complete loss of livelihood, loss of pasture / water, etc.).  <b>OR:</b> The project is directly related to stakeholder’s institutional field of interest and/or responsibilities.	The stakeholder has decision-making powers regarding whether the project will go ahead or not and/or about the adequacy of the ESIA process and/or LTWP’s mitigation strategies.
<b>Medium</b>	The stakeholder will experience some degree of impact but impacts can be managed and/or mitigated.  <b>OR:</b> The project or aspect thereof has some relevance to the stakeholder’s institutional field of interest and/or responsibilities	The stakeholder can influence the scope and timing of the ESIA and/or LTWP’s mitigation strategies.
<b>Low</b>	The stakeholder will experience very few effects as a result of the project.  <b>OR:</b> the project has limited relevance to the stakeholder’s institutional field of interest and/or responsibilities	The stakeholder has very little control over the project

Figure 5.2: Definitions for Stakeholder Analysis and Mapping

Stakeholder mapping will be undertaken during planned ESHS / CLO training and, once complete, the outcome of that exercise will be considered as a working document to be updated as necessary (and is therefore not included in this Plan).

## 6. Vulnerable groups

Vulnerable or marginalised stakeholders are defined as affected groups or individuals within the Project area of influence who could experience adverse impacts more severely than other stakeholders based upon their disadvantaged or vulnerable status. Such vulnerability may be evident due to factors such as ethnicity / race, national or social origin, gender / sex, language, religion, political or other opinion, property, birth or other status. A range of further factors needs to be taken into account to determine vulnerability status including culture, sickness, physical or mental disability, lack of literacy / numeracy, poverty or other economic disadvantage, and (over) dependence on ecosystem services for livelihoods or sustenance. Affected groups and individuals may belong to more than one vulnerable social group.

Vulnerable stakeholders require an open and inclusive approach to engagement that provides them with suitable opportunities to participate and voice their concerns. Some vulnerable stakeholders will need special attention in this SEP due to the factors that define their vulnerability. Accordingly, differentiated measures may be applied to ensure the effective participation and obtain feedback from vulnerable stakeholders.

### 6.1 Identification

LTWP, via ATL, will therefore identify individuals and groups who may be differentially or disproportionately affected by operations due to their disadvantaged, isolated or vulnerable status and consider specific and proactive engagement measures for these groups.

The outcomes of the various socio-economic baseline and impact studies (including the research into the applicability of IFC requirements for bona fide indigenous peoples) identified the following potentially vulnerable groups as being within or near to the LTWP Project's area of influence:

- **Tribal communities:** The Samburu and Turkana tribal groups comprise the predominant ethnic people within the Project area of influence. Members of both the Gabbra and Rendille tribes are known to inhabit the broader surrounding area in relation to the wind farm site, and a small Elmolo community is located approximately 70km north-west of the site on the shores of Lake Turkana. They rely heavily on pastoralist activities, apart from the Elmolo which believed to be the smallest tribe in Kenya and more dependent on fishing (therefore the most vulnerable to change).
- **Adult women:** Local women traditionally have only restricted access to resources due to cultural factors. They are often afforded only a low level of representation in community decision making processes and may suffer from spousal abuse;
- **Female headed households:** In addition to the disadvantages of gender, such women often have restricted access to income generating activities and suffer from higher levels of food and water insecurity.
- **Single headed households** have similar problems (e.g. where the man's ability to earn a livelihood may be restricted by family commitments);
- **Uncontrolled influx may include:**
  - **Vulnerable unemployed people**, particularly young adults, who are already disadvantaged and whose condition worsens as a result of moving onto the area; and
  - **Sex trade workers:** Not identified currently within the Project area of influence but may migrate or be trafficked into the area once construction works commence. Sex workers may

not have access to forms of protection (e.g. access to the authorities, health and/or children's education services) and are often subject to discrimination and harassment.

- **Elderly:** The aged and infirm are less likely to receive an income and may rely upon their families for support (however their age may confer an elevated status in traditional governance systems and decision making);
- **Children:** Children are principally reliant upon older members of the family for sustenance, shelter and general well-being;
- **Physically / mentally sick and disabled:** The lack of government services in the local area deprives such stakeholder of institutional support and services to encourage their social and economic participation in the community;
- **Pastoralists:** Herding livestock is one of the principal sources of livelihood in the Project area. However, due to on-going natural processes of drought and desertification / deforestation coupled with over grazing, there has been a marked decline in the carrying capacity of the rangelands so households and individuals reliant upon herding livestock have a declining standard of living. However, concerns about the Sirima's proximity to the main site means that they will be closely monitored;
- **Others dependent upon ecosystem services:** Stakeholders dependent upon the collection of wood for charcoal production or timber for construction and also face similar declining ecosystem carrying capacity;
- **Internally displaced:** There have been ongoing outbreaks of violence within the wider region, variously involving livestock rustling, disputes over fishing rights or access to water, pasture and other resources. This has led to increases in the population of settlements and consequent loss of access to resources, community cohesion and livelihoods although it is considered highly unlikely that such people will be subject to any significant adverse project impacts; and
- **Externally displaced:** There are no refugee camps housing displaced people from Somalia, Ethiopia or South Sudan in the Project area of influence; however, there are a number of factors (e.g. ongoing 'villagisation' of pastoralist processes in Ethiopia) that may cause future displacement from those countries. LTWP will monitor and engage with appropriate GoK departments should externally displaced people seek refuge within the concessional area. Although it is considered highly unlikely that such people would traverse the vast distances from neighbouring countries to the Project site.

### 6.2 Monitoring Changes to Vulnerability

ATL will continue to assess the vulnerability of individual and groups who may be potential candidates for vulnerability status. Particular attention shall be afforded to the most vulnerable, least visible and voiceless for whom special consultation measures may be required.

The CLO will maintain and update existing records of vulnerable stakeholder groups and will screen potential individual and group candidates using the criteria developed in the Vulnerability Screening Checklist (see format in Appendix D). This process requires an update to relevant data and an evaluation of vulnerability status, which will be undertaken either when the CLO or ESHS Manager identify a specific need or at a minimum frequency of annually during construction and the first two years of operations.

### 6.3 Differentiated Engagement Measures

Thus far, LTWP has used suitably qualified and experienced community liaison representatives drawn from the local area with relevant linguistic skills as its intermediaries in its dealings with stakeholders. Irrespective of previous stakeholder consultations, LTWP, via ATL, will ensure that such groups remain subject to culturally appropriate, differentiated measures in future engagement and/or consultation campaigns.

The type and nature of such measures will vary according to circumstances and may consist of any combination of the following:

- Ensuring the legitimacy of any designated representatives for vulnerable groups;
- Respecting traditional decision-making governance;
- Engaging separately with women and men whenever pertinent;
- Subsidising travel and/or subsistence expenses of vulnerable stakeholders attending engagement events; and
- Focusing any mitigation on sustainable livelihood development for such groups.

The appropriate actions shall be recommended by the CLO and approved by the ESHS Manager subject to standard business controls and levels of authority.

### 6.4 Indigenous Peoples

Tribal groups and ethnic minorities can sometimes be described by terms such as “Indigenous Peoples” (which is used by the IFC despite the lack of any universally recognised definition of that term). The IFC uses the term “Indigenous Peoples” in a generic sense to refer to a distinct social and cultural group possessing the following characteristics in varying degrees:

- Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others;
- Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories;
- Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or
- A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.

Such groups are generally considered to be amongst the most marginalised and vulnerable segment of population and they can be more vulnerable to impacts associated with project development. Their inability to defend their rights to, and interest in lands, natural resources and ecosystems services may also impact their social and cultural life.

#### **Identification checkpoints for screening a group for ‘indigenous peoples’ status:**

- *Do they identify themselves as indigenous peoples and are they, at the individual level, accepted as members by their community?*
- *Do they have historical continuity or associations with a given region or area of land region prior to colonisation or annexation?*
- *Do they have strong links to territories and surrounding natural resources / ecosystem services (e.g. cultural associations)?*
- *Do they maintain, at least in part, distinct socio-economic and governance systems?*
- *Do they maintain, at least in part, distinct languages, cultures, beliefs and knowledge systems?*
- *They are resolved to maintain and further develop their identity and distinct social, economic, cultural and political institutions as distinct peoples and communities?*
- *Do they form non-dominant sectors of Kenya society?*

Their peculiar circumstances may require special protective measures in the event that they are adversely impacted by a project as required by host country laws and international standards such as IFC PS 7: Indigenous Peoples (2012) and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP). Those standards set out an approach that aims to avoid any impacts (especially relocation) and requires a distinct, culturally appropriate process for information disclosure, consultation and informed participation. That process can under certain circumstances trigger the principle of Free Prior and Informed Consent, which requires projects to obtain a clear mandate to proceed from bona fide indigenous peoples.

LTWP, its advisers and the World Bank concluded that there were no predicted significant, direct adverse impacts upon the Elmolo community by the project and that there was no immediate need for a specific Indigenous Peoples Plan. Nevertheless, LTWP's CLO, supported and overseen by the ESHS Manager, will continue to monitor the Elmolo and their circumstances in accordance with their status as a Vulnerable Social Group as described in Section 6 above. Accordingly, any marked worsening of the Elmolo's situation as a result of Project activities may trigger specific criteria for engagement and, as appropriate, initiate a review of possible measures<sup>2</sup> to alleviate their situation. The CLO will also monitor other potentially qualifying groups for any significant change in circumstances that would afford them similar Vulnerable Social Group status.

Thus far, no other groups have been identified that meet the IFC's 2012 definition and might therefore trigger the Lenders' Indigenous Peoples criteria as defined in PS 7 or EIB Standard 7: Rights and Interests of Vulnerable Groups<sup>3</sup>.

## 7. Action Plans

As the Project has completed its impact assessment, consultation and approval phase, this SEP focusses upon LTWP's interactions with both affected and interested parties during the remainder of the pre-construction, construction and operations phases. This section sets out LTWP's plans to ensure it meets its objectives and goals for stakeholder engagement throughout the remainder of the Project in respect for each stakeholder group identified in section 4 above.

### 7.1 Engagement Methodologies

Stakeholder engagement and community liaison activities are determined by LTWP's various commitments and Project scheduling, so a variety of disclosure and engagement methods will be used. Disclosure methods will vary according to the target audience and its capacity to understand the information being communicated – see guidance in the International Association for Public Participation (IAP2) Public Participation Toolbox. For example:

- Visual representations (photographs, diagrams or models) for use in public barazas and face-to-face sessions with local residents, especially where a high level of illiteracy or a lack of understanding of the predominant language / dialect is anticipated;
- Brochures, leaflets, posters, non-technical summary documents and performance reports will be prepared, and made available both as/when required for specific stakeholder engagement activities and upon reasonable request from interested parties or others. Publicly available documents such as the ESIA's are already accessible on LTWP's website; specific reports such as annual monitoring reports to Lenders may however remain confidential<sup>4</sup>. NB: only specific community disclosure documents, including this Plan, and its associated documents and forms, shall be translated into Swahili or other local language as appropriate. These will be available on the project website and copies of the SEP will be provided at the Local Chief Offices;
- Information centres established at the Nairobi HQ and at the Karungu recruitment office;

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<sup>2</sup> See the United Nations Global Compact's Business Reference Guide on UNDRIP for suggested practical actions to uphold indigenous rights and monitoring their circumstances. Available at <http://www.unglobalcompact.org/resources/541>.

<sup>3</sup> LTWP's on-going Human Rights Due Diligence process will address any potential changes to this conclusion (e.g. as a result of changes in Kenyan legislation, local demographics or significant adverse Project impacts) and identify any actions needed to address the situation.

<sup>4</sup> As per EIB's Transparency Policy, some project documentation may be made available upon request from a member of the public.

- Hazard warning signage will be erected to inform stakeholders of specific risks - e.g. for road works, dangerous road junctions (such as at Laisamis, Namarei and Illaut), dangers of electrocution, etc.;
- Visual, informative displays at each entrance to the wind farm to explain the Project to provide an outline of essential information such as access restrictions and security requirements; and
- Press - newspapers, posters, radio and/or television – will be used as necessary for reaching the widest possible audience at national/international levels.

Similarly a variety of engagement methods will be used to consult with each of the stakeholder groups identified in section 5; the specific methods may vary according to target audience, topic, etc. but are expected to include amongst others:

- Interviews with legitimate stakeholder representatives and/or designated key informants;
- Surveys, polls, and questionnaires of affected parties (including by mobile telephone);
- Public meetings / barazas, workshops, and/or focus groups with specific groups such as vulnerable people (NB: specialist NGOs or other service providers may be hired by LTWP to undertake specific campaigns or contribute to events);
- Participatory methods; and
- Other mechanisms / traditional for consultation and decision-making.

As appropriate, stakeholders will be advised how their personal contact information and feedback will be used and how LTWP will respect their privacy and the confidential nature of any issues. For each planned engagement campaign or individual activity, the ESHS Manger and CLO shall determine the precise approach and tools to be used, compiling the Stakeholder Engagement / Community Liaison Planning Form (see Appendix C) to take account of the following factors:

- What information is to be disclosed, in what format, and how it will be communicated; and
- How the views of vulnerable sub-groups will be taken into account.

## 7.2 On-going engagement with interested parties

At this stage of the Project, LTWP's stakeholder engagement activities are continuing in preparation ahead of the construction phase and are focussed upon the following topics:

- **Government of Kenya authorities and agencies:** Having secured certification of the Project's ESIA's (i.e. wind farm, road upgrade and associated transmission line) from NEMA, the Water Resource Management Authority (WRMA), National Museums of Kenya (NMK), Ministry of Transport's National Highway Authority (NHA) and Rural Roads Authority (RRA), Civil Aviation Authority (CAA), LTWP is actively pursuing a notice to proceed from the government to allow work to commence on the road upgrade component. LTWP is also addressing the commitments and recommendations made in the ESIA's, obtaining the necessary permits and maintaining a working dialogue with NEMA and other agencies as required;
- **Marsabit County and divisional authorities:** Physical planning and business permits, security matters, influx management and general project information dissemination on the various Project components;
- **Ketraco:** LTWP is actively engaged with Ketraco, both supporting implementation of the associated transmission line's RAP and gearing up to provide its 'best efforts' oversight of environmental and social performance during its construction (which will involve interactions with Ketraco's contractor) and operation (as per the Lenders' Transmission Interconnector Schedule), the various County Councils, local administrations and affected communities along the route of the transmission line;

- **Project Lenders:** LTWP has been in regular communication with the consortium of Lenders to the Project and their representatives (Lenders' Engineer), clarifying the Lenders' environmental and social criteria and determining the long term performance monitoring and reporting regime;
- **Contractors:** LTWP remains in discussion with its diverse contractors, clarifying its technical requirements including refinements of environmental and social compliance conditions and negotiating the later stages of the tender process; and
- **Affected Communities:** LTWP is maintaining communications with local communities and affected vulnerable groups to keep them informed as to the progress of the Project, but is yet to start its main thrust of engagement with them in preparation for the start of construction works.

### 7.3 Planned Engagement with Affected Communities and Parties

LTWP shall launch a communications campaign to inform affected parties as follows:

- **Abbreviated Resettlement Action Plans:** LTWP, via ATL, shall follow up on the commitments made to the Sirima community and to those stakeholders who will be physically and/or economically displaced by LTWP's road upgrade works. See the [Sirima A-RAP](#) and [Road Upgrade A-RAP](#) for respective details on the related engagement.
- **Project Awareness:**
  - Ongoing sensitisation to all affected parties about the Project, its potential risks / impacts / benefits (e.g. influx, road safety, employment), LTWP's mitigation strategies and guidance on what actions affected parties need to take to protect themselves, their livestock and property. Information to be disclosed shall include:
    - An update on the Project (nature, scale, timetable, etc.);
    - An overview of the stakeholder engagement process and how affected parties can participate and provide feedback through programmed meetings (including how communities will be notified about meeting dates, timings and venues);
    - Project risks and impacts to the environment, land use (physical and economic displacement, degradation of ecosystem services), influx, health, safety and security, etc.;
    - Mitigation plans (a summary of commitments is to be included in an update to previous disclosure materials);
    - Potential benefits such as opportunities for employment and recruitment procedure plus other programmes being developed by the Winds of Change Foundation (LTWP's CSR vehicle for the operational phase);
    - Participatory approach involving affected communities in monitoring certain environmental impacts (e.g. pastureland, dusts and water resources); and
    - LTWP's reporting of engagement activities and disclosure of their outcomes.
  - In particular, affected parties will be clearly informed how to apply for employment, how to communicate complaints and how the grievance resolution and redress procedure will work. See the [Labour Management Plan](#) for recruitment arrangements, and Section 7 below for details of the interim grievance procedure (NB the grievance procedure may be amended to take account of community feedback);
  - HIV/AIDS and STD Awareness: An NGO will provide community awareness training during construction in the Project area of influence; and
  - As appropriate, the approach to such communications shall vary according to the targeted audience. For example, barazas will be organised at each settlement for the wider communities, however a more sensitive approach shall be adopted for engaging with vulnerable people to ensure that the views of women and other relevant sub-groups (e.g. vulnerable, minorities,

elderly, infirm, youth, etc.) are duly taken into account during the engagement process – see Section 6 above.

Thereafter, ongoing consultation will include the following elements:

- **Routine disclosure and consultation** on the Project’s environmental and social performance, including complaints / grievances, and any future planned developments of the wind farm (and roads);
- **Ongoing grievance resolution**; and
- **Ongoing vulnerability screening**: Regular, targeted engagement with each relevant group including the Elmolo to identify any changes in circumstances.

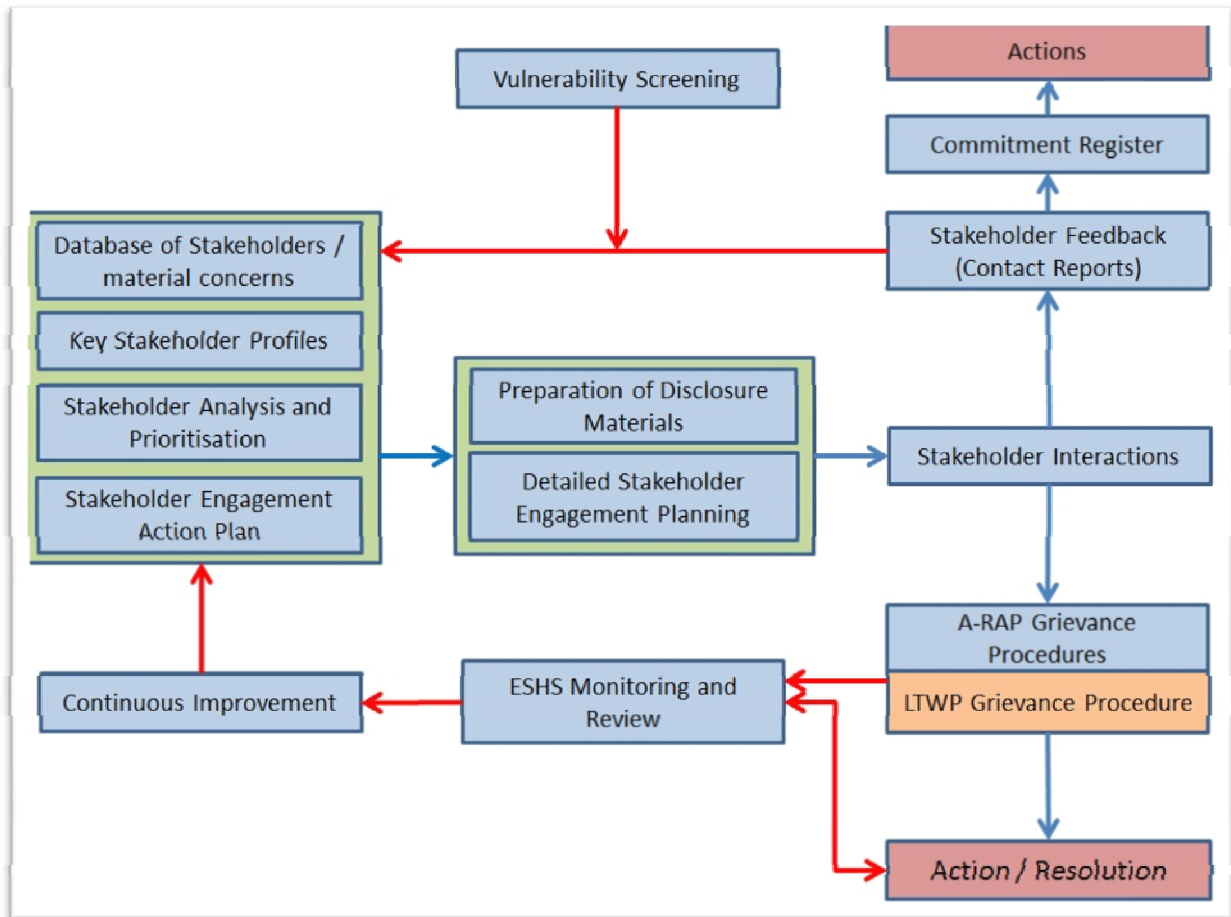
## **7.4 Stakeholder Engagement Process**

**Appendix F** presents a provisional Stakeholder Engagement Action Plan for the Project; the definitive version will be a ‘live’ document within the ESMS. The provisional version has been prepared by LTWP ahead of the mobilisation of its ESHS team and the CLO to facilitate rapid implementation ahead of the start of construction works. The ESHS Manager and the CLO will review and update this SEP on a minimum 6-monthly basis or as needed by specific circumstances during the construction phase; this will revert to an annual frequency during operations.

Routine engagements may simply be planned using the **Community Liaison diary** to record date/time, location, purpose and participants. If needed for new or more complex engagement plans, individual **Stakeholder Engagement / Community Liaison Planning Form** (Appendix B) are completed by the CLO and authorised by the ESHS Manager to ensure proper preparation of each new engagement campaign, event or activity, including consideration of any practical issues, potential risks associated and whether or not differentiated measures such as a culturally appropriate approach are needed when engaged with vulnerable groups (e.g. the Elmolo).

The following figure summarises the LTWP stakeholder engagement process:

### **Figure 7.1 Overview of Stakeholder Engagement Process**



**Contact Reports** (Appendix C) are used to record feedback from all pertinent interactions with stakeholders, except for grievances which are recorded and processed as described in Section 8 below. This form will be completed by the CLO or any other LTWP manager, employee or consultant undertaking stakeholder engagement activities.

The stakeholder database will be updated with information from the Contact Reports to facilitate key word searches on specific topics, generate lists of target stakeholder groups and support the planning of engagement and liaison activities.

In addition, the **Stakeholder Commitments Register** (Appendix G) is used to track all new environmental and social commitments made by LTWP to its various stakeholders over the life of the Project and ensure timely follow-through on its promises. This is another ‘live’ document which is maintained by the CLO. It records all specific commitments to action made to Central Government, District / Regional Authorities, Civil Society (NGOs / CBOs / FBOs) and Local Communities, assigning the various actions and timescale needed to discharge the obligation.

A formal review of the stakeholder engagement process shall be undertaken annually or whenever a significant change is needed in order to fulfil LTWP’s commitment to continual improvement. Additionally, LTWP will undertake Human Rights due diligence reviews at appropriate intervals during the Project in order to identify any new or changed risks and impacts in line with the principle of continual improvement.

Human Rights Due Diligence is an iterative risk management process that is undertaken in order to identify, prevent, mitigate and account for any negative human rights impacts. It considers the host country context, potential and any actual human rights impacts resulting from Project activities; and the business relationships

connected to those activities (e.g. between the proponent and its clients, suppliers / contractors, public authorities / agencies and other organisations).

The process is defined in the UN's Guiding Principles on Business and Human Rights and includes 4 key steps:

- (i) assessing actual and potential human rights impacts
- (ii) integrating and acting on the findings
- (iii) tracking responses, and
- (iv) communicating how the impacts are addressed.

## 8. Grievance Mechanism

Effective and timely response to community complaints is essential for maintaining good community relations, and this includes potential issues related to influx and its associated impacts.

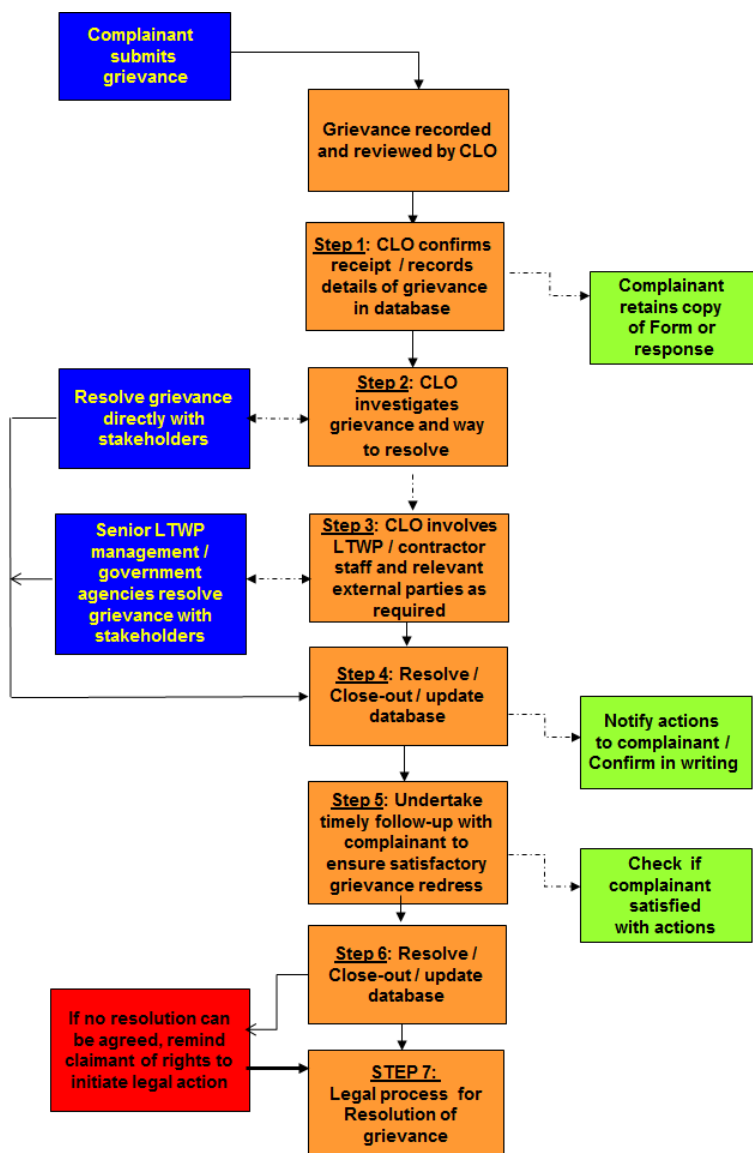
### 8.1 A-RAP Grievances

LTWP has established a professional team to advise and oversee the execution of Ketraco’s RAP for the associated transmission line. Given the general suitability of the developed methodology of recording and resolving those grievances and the redeployment of that team to implement LTWP’s A-RAPs, any grievances raised during implementation of either of the A-RAPs (Sirima village and the road rehabilitation) will continue to follow the guidelines and procedures set out in both A-RAP documents through to completion of those processes (i.e. sign-off by independent close-out audit).

### 8.2 Wind Farm Development Grievances

All other community / stakeholder grievances about the Project will follow the procedure set out in this Plan. The procedure is defined in details in Appendix H, which also includes examples of the supporting templates and forms. The following figure summarises the LTWP Grievance mechanism for the wind farm:

Figure 8.1 Grievance Procedure



### 8.3 Worker Grievance Procedure

LTWP is committed to enforcing its comprehensive labour and employment policies, including its requirements on workplace discrimination and harassment, across the entire workforce. This policy requires that all employees and contractor workers are to be treated fairly, with dignity and respect, and have equal employment opportunities.

The [Labour Management Plan](#) includes an authorised process for workers to raise grievances and concerns to senior management, covering any issues that are work related, that affect an employee or contractor, or that an employee deems unfair. Such concerns may relate (but are not limited) to the following:

- Management decisions;
- Occupational health and safety concerns;
- The behaviour or conduct of another employee, manager, or contractor; and
- The effects of LTWP Human Resources policy or procedures.

LTWP will ensure that all grievances raised by workers are treated impartially, respectfully and confidentially. The employee grievance process is separate from the aforementioned A-RAP and wind farm grievance procedures and is further described in the LTWP Human Resources policy or procedures.

In addition, anyone who becomes aware of or suspects any violations of obligations is encouraged to report the facts or their suspicions directly to senior management or through the whistleblowing system set out in the LTWP's Code of Ethical Conduct.

## 9. Monitoring, Evaluation and Reporting

### 9.1 Stakeholder Disclosures

A range of information will be produced to inform stakeholders of Project 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 (see Section 7.1 above). In addition, minutes will continue to be reviewed and signed by community/affected stakeholders' representatives for purposes of improved documentation of agreement. Information which will be disclosed to stakeholders includes 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 ESIA's);
- Annual Monitoring Reports submitted to lenders (if not deemed confidential); and
- LTWP's annual report / sustainability report etc.

The ESHS Manager and CLO shall define a schedule for the preparation and dissemination of all formal disclosures and shall monitor both departmental performance against schedule and any negative feedback from stakeholders in regards to disclosure materials or contents.

### 9.2 Contact Reports, Meeting Minutes and Other Monitoring

Contact Reports are to be prepared by CLO or other relevant function whenever an external consultation event is conducted. Meeting minutes are also to be kept for community meetings and other ESHS engagement activities held with affected stakeholders.

Where considered beneficial, participative community monitoring programmes will be introduced (see Stakeholder Engagement Action Plan in Appendix F) to check project impacts and the effectiveness of mitigation programs). The ESHS Manager and/or the CLO will establish suitable environmental and/or social topics for this approach, identify potential participants from amongst the affected communities, and provide any capacity building / training. The output (reports from participants) from such monitoring is likely to be verbal (meetings or telephones) and will be recorded by the CLO.

Other ATL managers / teams shall maintain suitable monitoring measures for engagement with interested parties / other stakeholders such as Central and Local Government and their agencies, non-government organisations and the general public. All new commitments made by LTWP or its representatives to stakeholders are to be entered into the Commitments Register.

In the event that any monitoring results identify non-conformances of any Project Standards, these will be investigated and corrective actions identified.

The monitoring measures that are to be implemented for community engagement to ensure compliance with the Project Standards are described below:

- Dissemination of community and other disclosures (e.g. nature of disclosure, when circulation occurred and any feedback);
- A-RAP related grievances will be analysed and reported by the A-RAP team in accordance with their specific procedures;
- Other grievances will be analysed and reported by the CLO as per the requirements of this SEP;
- Stakeholder engagement activities including any notable stakeholder visits to LTWP offices /or sites will be collated and reported by the CLO; and
- Results of vulnerability screening exercises and any other surveys of external or internal stakeholder concerns, circumstances or perceptions.

### **9.3 Routine Internal Reporting**

Regular reporting shall be undertaken via the monthly ESHS Team Report that shall be prepared and submitted to the General Manager.

Stakeholder engagement / community relations reporting shall include:

- A summary of stakeholder engagement activities and all grievances received in the reporting period;
- Any material deviations or non-compliances to the requirements of this SEP;
- Planned activities for the next reporting period; and
- Any issues of potential concern.

## References

- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets, IFC, May 2007
- The IAP2 Public Participation Toolbox
- UN Guiding Principles on Business and Human Rights, United Nations, 2011

**APPENDIX A: Key Stakeholder Profile**

Last updated:	
<b>Stakeholder group:</b>	
Primary subject/ issue of engagement with this group	
Stakeholder objective	
Preferred level of engagement with this group	
<b>Stakeholder group representative</b>	
Specific representative(s) / representing organisation	
LTWP contact person	
Stakeholder's general view	
Specific expectations	
Engagement history	
Stakeholders' usual or preferred approach to engagement	
Stakeholders' sources of funding	
Relationships/ conflicts with other stakeholders	
Knowledge of the issue	<input type="checkbox"/> Leading Opinion <input type="checkbox"/> Good Knowledge <input type="checkbox"/> Medium Knowledge <input type="checkbox"/> Lacking Knowledge <input type="checkbox"/> No Knowledge
Legitimacy	<input type="checkbox"/> High Legitimacy <input type="checkbox"/> Limited Legitimacy <input type="checkbox"/> Low Legitimacy <input type="checkbox"/> No Legitimacy
Willingness to engage	<input type="checkbox"/> Willing <input type="checkbox"/> Moderately interested but friendly <input type="checkbox"/> Uninterested <input type="checkbox"/> Hostile
Actual and/or potential impacts of stakeholder on business – associated risks and opportunities	Positive Impacts/ Opportunities:  Negative Impacts / Risks:
Scale at which they operate	<input type="checkbox"/> Global <input type="checkbox"/> National <input type="checkbox"/> Regional <input type="checkbox"/> Local <input type="checkbox"/> Internal to Project
Cultural issues to consider	
Practical issues to consider (e.g. ability to engage given literacy, resources, staff, etc)	
Is it necessary to engage with this stakeholder?	
Other comments	

## APPENDIX B: LTWP Community Liaison Planning Form

<b>Overview</b>			
Subject / scope of engagement			
Strategic objectives and intended outcomes:			
Engagement approach / method(s) / tools:			
Target groups & representatives:			
Practical Issues	Activities & resources	Responsibility	Timeframe
Ground rules and terms of reference			
Invitation / publicity / pre-information			
Logistics (Transport, food / refreshments, etc.)			
Venue, timing (if not ongoing)			
Equipment etc.			
Participants' reimbursement of expenses (?)			
Process to ensure satisfactory outcomes			
Agenda/ plan for the event			
On-the-day roles and facilitation			
Record keeping and assurance			
Feedback to participants			
Wider communication of results			
Signals of success ( inputs and outcomes)			
Participant satisfaction feedback			
<b>Risk Assessment of Proposed Engagement</b>			
Risks (including security):			
Contingency plan:			

### APPENDIX C: LTWP Stakeholder Contact Report

<b>Record Number</b>	<b>Entry Date</b>	<b>CLO / Other</b>	
<b>Name/Title of Contact and Organisation</b>		<b>Location of Interaction</b>	<b>Date</b>
<b>Stakeholder Contact Details</b>	Tel. no.: Email address: Street address:		
<b>LTWP Participants</b>			
<b>Who Initiated the Interaction?</b>		<b>Interaction Objective:</b>	
LTWP <input type="checkbox"/>	Contact <input type="checkbox"/>		
<b>Nature of Interaction:</b> Complaint <input type="checkbox"/> Commitment <input type="checkbox"/> Request <input type="checkbox"/> Other <input type="checkbox"/>			
<b>Summary:</b>   			
<b>Recommendations:</b>   			
<b>Action / Decision</b>	<b>Person Responsible</b>		<b>Due date</b>
<b>Close-out</b>	<b>Comments</b>	<b>Date</b>	

## **APPENDIX D: Vulnerability Screening Checklist**

So far there is no indication that the Project will adversely impact the Elmolo as they are located approximately 70km to the north of the Project footprint. As such the nature and extent of the likely impact is unknown. However, if by chance indigenous people are encountered, then LTWP will fully comply with all the guidelines and implement comprehensive mitigation strategies. This will be done through a comprehensive social assessment plan. Identification of Indigenous Peoples will be reported to the Lenders' Technical Advisor as soon as possible and next steps will be discussed and agreed with Lenders.

<b>Step 1: Initial Checkpoints</b>	
Define the vulnerable / marginalised social group (where appropriate refer to Indigenous Peoples criteria at 6.4 of the SEP):	
Why are they vulnerable? What are the underlying causes of vulnerability?	
Has their vulnerability evolved or changed as a result of the Project or other factors? If worsened, what are the main contributory factors?	
What are the vulnerable stakeholders doing to address their circumstances?	
What mitigation was targeted by the Project and how successful has it been / likely to be?	
What assistance, if any, does the group receive from central / local government, NGOs, aid agencies or others? What are their policies and how successful have their interventions been / likely to be?	
What are the capacities of the vulnerable group and any supporting NGOs?	
What recent engagement has the Project had with the group and their legitimate representatives?	
What are the main concerns?	
<b>Step 2: Research and Analysis Checkpoints</b>	
What additional data and research is needed?	
What additional mitigation options are available? How much? From whom? Over what timescale?	
What recommendations for further Project interventions? How feasible / what cost?	
How will success be judged and by whom? What performance indicators are needed?	
What further engagement is needed with this vulnerable group?	

**Step 3: Action Plan and Approval**

Confirm what actions are needed to implement recommendations and who needs to approve the plan?

--

## APPENDIX E: Stakeholder Analysis

*To be updated by ATL ESHS Manager as part of formalising the SEP*

### INDIGENOUS PEOPLES WITHIN THE WIDER VICINITY OF PROJECT AREA

The Project footprint will affect the district of Marsabit, inhabited by communities such as the *Turkana, Samburu, Rendille, Gabbra and the Elmolo*.

According to the 2009 household census, the Kikuyu are the most populous tribe in Kenya accounting for 20% of the total population. The Turkana, Maasai and the Samburu are respectively the 10th, 11th, and 16th largest tribes in the country. The Gabbra and the Rendille though considered minority tribes are the 22nd and 25th largest tribes respectively. The Elmolo is not identified in the ethnic table; instead it is classified under 'other tribes'.

While the Kikuyu tribe does not qualify as an indigenous tribe, most of the ethnic tribes within the district of Marsabit fulfil the general criteria of indigenous people of the World Bank, African Union and Kenya. However, even within these groups, some of the tribes are in a structural subordinate position to the dominating ethnic groups, leading to further marginalisation and discrimination.

It is arguable that certain groups, which are marginalised and discriminated at national level, might at a local level be in a dominant position or at least able to defend their rights, interest and to voice their opinion. For example, the Turkana, Samburu, Gabbra and Rendille are the most dominant tribes in Northern Kenya and are well adapted to the area's socio-economic and harsh environmental conditions. On the other hand, in the south-west of Kenya, the Maasai are the most recognised pastoral community due to their preserved culture.

Based on the foregoing, it is clear that while most of these tribes are considered marginalised at international, regional and national level, they have the same chance under this project to voice their concerns if their rights, interest, needs, livelihood, culture or desires are affected. Therefore, for the purposes of this ESMS, the concept of Indigenous Peoples has been narrowed down to a special hunter-gatherer community or the Elmolo based on the following reasons:

- i. The Northern part of Kenya is dominated by pastoralist communities. The Elmolo is the only hunter-gatherer community encountered in the area during the screening process. At present, the government does not provide for a classification of hunter-gatherers as separate groups.*
- ii. The Elmolo are marginalised through their way of living and their livelihood patterns, as in Kenya all hunting is illegal and all policies, sector strategies and projects solemnly address the needs and interests of agriculturalists and/or pastoralists.*
- iii. Elmolo originally settled on the northern shores of Lake Turkana. Due to boundary insurgence pressure from the Turkana, Samburu and Rendille tribes inhabiting the area, the Elmolo have moved to the southern shores of Lake Turkana where they are gathered into only two villages in an area called the 'Island of Ghosts' or 'Island of No Return'*
- iv. Due to their almost constant historical suffering from other tribes, the Elmolo opted to remain cut-off from the rest of the world, maintaining a very traditional life.*

## APPENDIX F: Stakeholder Engagement Action Plan (Provisional)

No.	Target Engagement for	Purpose of Engagement	Engagement Tasks / Methods	Schedule Frequency /	Responsibility	Project Phase	Priority	Status	ESMS References / Comments
1	Government and local authorities, regulators and other agencies	Establish and maintain a good working relationship with the various authorities to promote the Project's interests, facilitate compliance and cooperate on issues of material interest to all parties	<ul style="list-style-type: none"> <li>- Ongoing planned and ad hoc communications and liaison with various levels of Ministry / directorates and County / Division authorities (in compliance with LTWP's Code of Ethical Conduct)</li> <li>- Development of Memoranda of Understanding on specific subjects (e.g. site security)</li> <li>- Host regulatory visits and full cooperation during inspections and audits</li> </ul>	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as required during Project life cycle)	LTWP Board / General Manager / others as designated (e.g. Private Security company engagement with law enforcement and other government security agencies)	Pre-construction / Construction / Operation / Closure	TBA	In progress	(Security Management Plan)
2	National / regional / local media	Provide key information to TV / radio / newspaper / on-line media	Provide Press Releases, articles / photographs	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as required during Project life cycle)	LTWP management and PR advisors	Pre-construction / Construction / Operation / Closure	TBA	On-going	LTWP Protocols for interactions with the press
3	National / international NGOs and academia; local NGOs / CBOs	Provide opportunities for interested parties to obtain information on the Project and its impacts	Regular updates / ad hoc briefings on specific issues / opportunities (e.g. Turkana Basin Institute, Birdlife International, etc.) plus disclosure of specific reports and information on the LTWP website	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as required during Project life cycle)	LTWP management	Pre-construction / Construction / Operation / Closure	TBA	On-going	(Respond to specific, reasonable requests)
4	Key stakeholders (including lenders)	Seek opportunities for obtaining qualitative feedback on Project -related issues from key stakeholders (e.g. interested parties and/or high influence-power-value contacts)	Meetings, interviews and telephone calls. Can also consider establishing a more formal 'advisory group' for general feedback or on specific issue / material concern.	As required during Project life cycle	LTWP management	Pre-construction / Construction / Operation / Closure	TBA	On-going	
5	Stakeholders of the associated T-line construction	Undertake oversight of the relationship between Ketraco and its contractors and parties affected by the construction of the transmission line	<ul style="list-style-type: none"> <li>- Informal interviews with individuals or groups (generally ad hoc) and observations of T-line / community interactions and provision of feedback and advice to Ketraco</li> <li>- Ongoing 'best efforts' interactions with T-line managers and personnel</li> </ul>	As required during T-line construction (e.g. quarterly)	LTWP Environment Officers / Community Relations / RAP team	Associated Facility	TBA	TBA	Transmission Line Oversight Management Plan
6.1	Physically and economically displaced affected parties	Agree definitive compensation and assistance measures for those affected as per the A-RAPs. Confirmation of the restoration of living standards and the attainment of the A-RAP's objectives.	Meetings/ barazas with affected groups and legitimate representatives to agree level of compensation and/or assistance (sign contract?)	Regular meetings following NTP as per A-RAP schedule (e.g. monthly / every 2 weeks then as required)	LTWP A-RAP team	Pre-construction	N/A	Complete	Sirima Village A-RAP / Road Rehabilitation A-RAP
6.2	Physically and economically displaced affected parties	Implementation of agreed compensation and assistance measures for those affected	<ul style="list-style-type: none"> <li>- Visits to settlements / individual households as needed to disburse compensation</li> <li>- Supervision and follow-up of relocation assistance measures and resolution of grievances</li> </ul>	As required during A-RAP implementation (e.g. monthly / every 2 weeks then as required)	LTWP A-RAP team	Construction	TBA	TBA	Sirima Village A-RAP / Road Rehabilitation A-RAP

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6.3	<b>LTWP employees and contractors</b>	Ensure Project workforce and visitors to site are aware of the cultural context and are briefed on personal conduct and obligations to local communities	Implement community relations and cross-cultural inductions, including 'Camp Rules' and instructions prohibiting illegal / anti-social behaviour, minimising land disturbance and protection of cultural heritage (Chance Finds Procedure)	Contemporaneous with mobilisation of LTWP and contractor workforces with provisions for 'new arrivals' and refreshers as needed	ESHS Manger / CLO (plus SE practitioner / Consultant as necessary) / HR	Construction / Operations / Closure	TBA	TBA	Labour Management Plan
6.4	<b>Economically displaced affected parties</b>	Monitor local affected stakeholders employed by the Project on contract or casual basis	Informal interviews with individuals or groups (planned or ad hoc, depending upon type of employment)	- Ad hoc for casual workers - Initial contact with contract workers within 1 month of starting work, as required thereafter (e.g. may be monthly or quarterly as minimum)	CLO (plus SE practitioner / Consultant as necessary)	Construction	TBA	TBA	Labour Management Plan
6.7	<b>Physically and economically displaced affected parties</b>	Monitor relocated and compensated / assisted stakeholders to ensure timeliness and effectiveness of planned measures	- Undertake community meetings and barazas / visits to individual households to monitor reaction to changed circumstances and identify any potential cases of hardship especially amongst vulnerable groups - Formal survey every year until A-RAP completion audit confirms adequate close-out - Independent A-RAP completion audit	- 6 monthly monitoring and meetings / household visits until Completion Audit - Completion Audit when A-RAP programme deemed completed	LTWP A-RAP team / CLO (plus SE practitioner / Consultant as necessary)	Construction / Operations	TBA	TBA	Sirima Village A-RAP / Road Rehabilitation A-RAP
7.1	<b>Project affected stakeholders</b>	Sensitisation and awareness-raising in relation to Project schedule, activities and impacts	- Undertake community meetings and barazas to advise on Project progress, brief them on any specific issues (such as heavy construction equipment, possible use of explosives, borrow pits, electromagnetic fields (EMF) / electrical safety, increased road traffic, security, potential influx and employment) and explain the grievance procedures - Customised briefings for vulnerable groups (e.g. road safety for the illiterate, elderly, children, nomads, etc.) - Advise on process to submit proposals for community assistance programmes to the Winds of Change Foundation	As required by each construction work package - in advance of contractor arrival for road rehabilitation, village and installations, turbines, etc.	CLO (plus SE practitioner / Consultant as necessary)	Construction	TBA	TBA	Stakeholder Engagement Plan / Community Health and Safety Plan: <i>This engagement may need to be spread out over a suitable period to reflect the Project schedule - e.g. prior to arrival of contractors in the area, borehole drilling, heavy vehicles / convoys of abnormal loads, start of various construction /operations for different components (road upgrade / bridges, wind farm access roads, turbine foundations, erection of turbines, etc.); ESHS Manager / CLO to detail plans accordingly.</i>
7.2	<b>Project affected stakeholders</b>	HIV/ AIDS and STD sensitisation	- Provide community awareness training ahead of the mobilisation of contractor workforces - Collaboration with health authorities / NGOs to support health promotion (other communicable disease, lifestyles, etc.)	As required by each construction work package - in advance of contractor arrival for road rehabilitation, village and installations, turbines, etc.	Contracted NGO (Community Liaison)	Construction	TBA	TBA	Stakeholder Engagement Plan / Community Health and Safety Plan
7.3	<b>Settlements potentially affected by Project activities that generate dusts or impact upon water resources</b>	Implement participatory monitoring programme for affected stakeholders	- Selection and training of designated stakeholders to monitor and report dust emission levels and effects on wells and community water resources - Record results and provide feedback to communities	Minimum monthly contact during construction phase for road rehabilitation works	LTWP Environment Officers / CLO (plus SE practitioner / Consultant as necessary)	Construction	TBA	TBA	Construction Oversight Management Plan

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7.4	<b>Pastoralist communities directly impacted by Project-related degradation or loss of livestock pasture</b>	Implement participatory monitoring programme for affected stakeholders	<ul style="list-style-type: none"> <li>- Selection and training of designated stakeholders to monitor and report impacts to pastureland and/or poor site rehabilitation</li> <li>- Record results and provide feedback to communities</li> <li>Monitor effects and manage expectations or, if appropriate, consider further mitigation measures (e.g. liaison with NGOs on sustainable livestock management, limited replanting, etc.)</li> </ul>	As required during construction phase	LTWP Environment Officers / CLO (plus SE practitioner / Consultant as necessary)	Construction	TBA	TBA	Construction Oversight Management Plan
7.5	<b>Settlements located along the main supply route but outside the Project area of influence</b>	Advise residents of Project -related traffic and potential for increased road safety risks	<ul style="list-style-type: none"> <li>- Transport contractors to liaise with relevant road and traffic police authorities</li> <li>- LTWP to brief affected communities and/or their representatives on anticipated transport movements in their area and any related road safety measures (focus on children, elderly, etc.)</li> </ul>	Prior to planned movements of heavy equipment and transport of turbine components (long loads)	C L O (plus SE practitioner / Consultant as necessary)	Construction	TBA	TBA	Traffic Management Plan
8.1	<b>Sirima community</b>	Ensure good working relationship is established and maintained with the neighbouring community	Regular and ad hoc meetings / barazas; possible occasional social events for LTWP / Sirima communities (e.g. respect for traditional rites / festivals)	Weekly courtesy visit / monthly formal meeting or as required throughout the Project	CLO (plus SE practitioner / Consultant as necessary)/ ESHS Manager	Pre-construction / Construction / Operation / Closure	TBA	Ongoing	Stakeholder Engagement Plan / Community Health and Safety Plan
8.2	<b>Vulnerable groups</b>	Ensure adequate Project protection of vulnerable groups and individuals and monitoring any changes to the level of marginalisation or disadvantage of others	<ul style="list-style-type: none"> <li>- Visits to vulnerable groups / individuals, including the Elmolo, as required to monitor situation and if applicable identify additional mitigation measures</li> <li>- Survey / check 'vulnerability status' of stakeholder who have been potentially more marginalised or disadvantaged by the Project</li> <li>- Liaison with relevant authorities and NGOs with a view to developing focused mitigation measures</li> </ul>	<ul style="list-style-type: none"> <li>- Minimum 6-monthly during construction / annually in operations phase</li> <li>- Following identification of a specific need or at a minimum frequency of annually during construction and the first two years of operations</li> </ul>	CLO (plus SE practitioner / Consultant as necessary)	Construction / Operations	TBA	TBA	Stakeholder Engagement Plan / Community Health and Safety Plan Indigenous Peoples Policy Framework (if triggered)
8.3	<b>Settlements potentially affected by uncontrolled in-migration</b>	Implement a participatory monitoring programme for potential influx and associated impacts	<ul style="list-style-type: none"> <li>- Sensitisation and awareness-raising of potential Project-related influx and its impacts in order to involve target communities in decision-making (threshold levels for interventions) monitoring and developing contingency plans in the event of significant uncontrolled in-migration</li> <li>- Capacity building for individuals selected as monitors</li> <li>- Engagement with relevant authorities and NGOs</li> </ul>	Before commencing key Project activities at variable frequency depending upon role of stakeholder and subject matter (e.g. annual, bi-annual, monthly, etc. then as continue thereafter as required	CL O (plus SE practitioner / Consultant as necessary)	Construction / Operations	TBA	TBA	Influx Management Plan
		Survey of affected stakeholders to gain information on any changes in circumstances, concerns or perceptions.	Limited use of questionnaire approach to individuals, households or focus groups (including by mobile telephone) to obtain information on any relevant issues directly from those affected by the Project (e.g. in relation to influx levels, water resources, pastureland / wood availability, potential for conflict, etc.)	Annually for first 5 years then as required throughout the remainder of the Project	CLO (plus SE practitioner / Consultant as necessary)	Construction / Operations	TBA	TBA	Stakeholder Engagement Plan <i>ESHS Manager / CLO to devise any questionnaires, telephone polls or other approach if / as needed</i>
8.4	<b>Communities potentially affected by Project-related emergency situations</b>	Raise awareness of authorities and public in regard to any potential emergency scenarios that could be caused by the Project, how they could be affected and the measures to take	Use planned meetings / barazas to inform communities, explain plans and if necessary test arrangements (NB: Credible Project-related emergencies might only include a deterioration in the general security situation or accidental and uncontrolled bush fires)	At start of construction, thereafter as needed (at least annually)	ESHS Manger / CLO	Construction / Operation / Closure	TBA	TBA	Community Health and Safety Plan / Emergency Preparedness and Response Plan
9	<b>All affected and interested parties</b>	Provide stakeholders with information on Project progress and performance on matters of material concern including resolution of complaints	<ul style="list-style-type: none"> <li>- Prepare and disclose brochure on the Project's local stakeholder engagement programme</li> <li>- Prepare an annual performance report (non-technical) for disclosure to local communities (e.g. in planned meetings or limited circulation to village chiefs and legitimate representatives) and wider society (e.g. via</li> </ul>	- Separate engagement brochures to be prepared for construction and operations phases	ESHS Manger / CLO	Construction-Operations transition / Operations	TBA	TBA	Framework ESMP (policy requirement - IFC PS 1)

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			web site)	- Performance report to be produced at least annually					
10	All affected and interested parties	Consultation on any future expansion or other developments of the wind farm	Definition and implementation of appropriate disclosure and informed, prior consultation programme in support of any future developments as required by ESIA process and policy commitments.	To be determined if /when future developments are considered	LTWP	TBA	TBA	TBA	Project environmental and social policies and ESMS obligations

**APPENDIX G: Stakeholder Commitments Register**

Item No.	LTWP Commitment / Obligation									
	Who to?	Date	Type	Nature (Commitment Request / Other)	Source (e.g. Contact Report)	Scope	Details	Comments	Actions	Close -out
<b>A. Commitments to Central Government</b>										
A1										
<b>B. Commitments to District / Regional Authorities</b>										
B1										
<b>C. Commitments to Civil Society (NGOs / CBOs / FBOs)</b>										
C1										
<b>D. Commitments to Local Communities</b>										
D1										
<b>E. Commitments to Vulnerable / Marginalised Groups / Individuals</b>										
E1										

## APPENDIX H: LTWP Grievance Procedure

### 1. ROLE & RESPONSIBILITIES

#### Community Liaison Officer (CLO)

LTWP, via the Employers Representative Aldwych Turkana Limited (ATL), will appoint a CLO as a member of the ESHS Team, who will be responsible for the administration of the wind farm's grievance mechanism. The CLO will report to the ATL ESHS Manager and be assisted by other ESHS colleagues / team members where required.

The principal grievance responsibilities of the ATL CLO are to:

- Inform stakeholders about the grievance procedure (via Explanatory Note, below, for village chiefs);
- Record stakeholder grievances, both written and oral, categorising them and seeking solutions within a specified time period;
- Coordinate with relevant stakeholders and ATL, personnel;
- Maintain regular contact with complainants and other stakeholders to investigate and report progress regarding their grievances and ensuring momentum towards resolution;
- Specifically related to the administration of the grievance mechanism, and with assistance of ATL colleagues as required, the CLO will:
  - Set up a systematic process of recording grievances, in hard copy in the grievance form. Copies may be made accessible to stakeholders upon reasonable request;
  - Prepare an electronic database for recording and keeping track of grievances raised and their outcomes. The database will be updated weekly;
  - Communicate the grievance procedure to stakeholders, the process for recording their complaints and, where possible, the likely timeframe for redress. Communication will be carried out through community meetings involving the host communities. Leaflets providing an outline description of the grievance mechanism will be distributed to all affected households;
  - Raise the progress of grievances at team meetings for discussion, identifying the required coordination/interaction with other stakeholders and in particular highlighting cases requiring ATL management input. The A-RAP team may also identify grievances that need decisions to be taken at senior ATL management level and report these to the ESHS Manager and /or the General Manager as required;
  - Provide prompt and regular updates to stakeholders on the status of their grievance, including reasons for any delays. Where grievances are being addressed by ATL this update should be provided weekly; and
  - Ensure regular contact with claimants where grievances are dealt with by other stakeholders thus maintaining communication and encouraging momentum in the grievance process.

### 2. GRIEVANCE PROCEDUES

#### Introduction

Grievances from Project-Affected Stakeholders or Interested Parties may be received verbally or in writing, at LTWP/ATL or contractor offices or via ATL or contractor staff, and are most likely to be made known on an ad-hoc basis. All grievances – including any anonymous, group, unclear, potentially problematic grievances - received should be immediately recorded by ATL or contractor staff - using the [CONTACT REPORT, GRIEVANCE](#)

[FORM](#) or direct input to database - and then submitted to the CLO within 24 hours for insertion into the grievance database.

The CLO (or delegate) will then implement the following draft grievance procedure:

### **Step 1: Confirm Receipt of Grievance**

All grievances from all sources should be handled as quickly and effectively as possible, although in practice the nature, complexity and legitimacy of the complaint is a key factor in determining the timescale and course of action required. In regard to local communities, the CLO will undertake regular visits to affected settlements (a minimum of monthly visits or more frequently if required) and maintain close contacts with Village Chiefs / elders, setting up a weekly phone call to identify potential and actual submitted grievances and provide an update on their handling procedure.

As a general rule, all claims from affected communities should be accepted (i.e. logged) and, irrespective of the nature of the grievance, undergo a review and investigation process. Where practicable, the CLO will confirm receipt of the grievance by telephone or text message directly to the complainant or to village chief as soon as possible. Records of all proceedings will be kept and logged on the grievance database, being categorised as per [GRIEVANCE CATEGORISATION](#), which sets out what authorities should be involved in grievance redress according to its category and type. In cases of grievances that do not fall into the categories and types described herein, the CLO and ESHS Manager will decide upon an appropriate course of action in consultation with the General Manager.

If warranted (e.g. if complaint received from a national or international NGO, etc.) in writing within 7 days ([ACKNOWLEDGEMENT TEMPLATE](#)). The acknowledgement will include:

- A reference number;
- A summary of the complaint / grievance / enquiry (as understood by the CLO on the basis of information received so far); and
- The name of the CLO or delegate with contact information.

### **Monitoring**

- a) Percentage of total number of grievances received identified as requiring resolution;
- b) Percentage of total number of grievances received being confirmed verbally / by telephone; and
- c) Number of non-community complaints and percentage of written acknowledgements despatched by the CLO **within 7 days** of receipt (target 100%).

### **Step 2: Investigate Grievance and Seeking of Resolution**

The CLO will seek to meet with the claimant within 14 days of receipt of grievance to carry out further investigation into the matter and attempt to seek resolution. Where deemed appropriate and with the agreement of the claimant, the relevant local authority or other legitimate community representatives may also be involved in such investigations. If resolution can be achieved by the CLO following the meeting and with agreement with management, the grievance will be closed out either verbally or using the [CLOSE-OUT FORM](#) as appropriate.

Where the CLO is unable to resolve a grievance within 7 days of meeting with a claimant, the CLO will advise the claimant on the need to involve senior ATL management and/or third party authorities and the anticipated timeline for the next stage.

### **Addressing Unclear, Problematic or Dubious Grievances**

Although minor and straightforward matters normally only require basic screening to confirm validity and identify any underlying issues prior to processing the complaint, more complex or problematic grievances can need a more thorough review and an extensive investigation to confirm their legitimacy.

Examples of claims that may merit such treatment and/or possible redirection include:

- Commercial disputes - should be resolved through the contractually specified resolution / arbitration process or via civil courts;
- Claims of criminal activity / acts of violence – should be referred to the police authorities and/or the justice system;
- Claims about government authorities / agencies – should as a minimum be logged in the project system and passed onto the relevant institution for resolution. However, it is incumbent on the project to inform the complainant accordingly and explain how to pursue the claim with that institution. Avoid any mediation role between government and complainants, but try to monitor progress towards resolution to the extent possible;
- Claims that are not Project-related – should be accepted and assessed for legitimacy as normal, then politely rejected with a clear explanation as to why the grievance is not within the Project's responsibility (it may help to have the CLO ensure that there is a clear upfront understanding with affected communities and their representatives as to what kind of grievances can / cannot be processed); and

Potentially fraudulent, fabricated or insubstantial claims – should be logged and thoroughly, but fairly investigated to determine legitimacy as outlined below and, if not accepted, rejected with a clear explanation of the Project's reasoning provided to the complainant.

- 1) Inform General Manager, who should assign responsibilities and, if feasible, the timeframe for handling any potentially spurious complaints
- 2) Undertake discreet research and collate facts such as contact reports, timeline, photographs/maps, physical and documentary evidence. If a fraudulent claim is suspected, collect depositions from any internal and external witnesses.
- 3) Assemble an investigation team, including ATL managers / staff plus appropriate external assistants (translators, legal advisers, human rights specialist, independent NGO observers, etc.) but ensuring avoidance of any possible conflicts of interest
- 4) Develop a clear list of investigation tasks and outcomes and assess potential confidentiality requirements and safety risks
- 5) Meet with complainant and visit site(s)
- 6) Ensure the investigation results in:
  - a) a full understanding of the complaint, its context / circumstances, and – if feasible or appropriate – the complainant's preferred option for resolution
  - b) a clear decision as to whether the grievance and/or complainant have a legitimate claim or not, with recommendations for further actions

Following review and investigation, claims are either accepted and resolved in accordance with the grievance procedure, or rejected with an explanation stating why the Project has declined to address it. Note that, if rejected, the claimant may still wish to pursue the matter and seek legal redress, in which case the evidence collected during the investigation will help the defence case.

### Monitoring

- a) Percentage of meetings with claimant held within [XX] days of receipt of grievance (target 100%);
- b) Percentage of grievances (requiring resolution) per grievance category, resolved by CLO **within 7 days** of meeting the claimant (target 100%); and

- c) Percentage of grievances (requiring resolution) per grievance category, resolved by CLO **in more than 21 days** of meeting the claimant.

**Step 3: Involving senior ATL management or third party authorities where required**

Where the resolution of a grievance necessarily involves senior ATL management or third party authorities, this can include the ESHS Manager and/or General Manager from ATL. The decision regarding who should be involved will depend on the category and type of grievance.

In cases of involvement of senior ATL management the aim will be to resolve grievances within 21 days from the CLO meeting with the claimant in Step 2. A resolution meeting will be held and attended by the CLO, senior ATL management, local authorities and the claimant, as well as any other parties as relevant to the nature of the grievance (e.g. contractor management, local police, lawyers, neighbours, other witnesses etc).

In cases of independent third party involvement, the target will be to resolve grievances within 28 days from receipt of grievance. The CLO will follow up every 14 days with the claimant and the relevant authorities to investigate and report status and to facilitate resolution. As appropriate, the CLO will advise claimants to write to the respective authority, providing assistance to do so if required, to appeal a decision and/or to request a resolution meeting. The CLO will retain a copy of the letter in the file.

**Monitoring**

- a) Percentage of grievances requiring the involvement of senior ATL management resolved **within 14 days** from the CLO meeting with the claimant (target 100%);
- b) Percentage of grievances requiring the involvement of senior ATL management **resolved in more than 14 days** from the CLO meeting with the claimant;
- c) Percentage of grievances requiring the involvement of third party authorities resolved **within 30 days** from receipt of grievance (target 100%); and
- d) Percentage of grievances requiring the involvement of third party authorities resolved in **more than 30 days** from receipt of grievance.

**Step 4: Close Out**

If the Grievance is resolved, the CLO will ensure that the agreed corrective action is documented and the grievance process is formally closed out either verbally (local complainant) or the [CLOSE-OUT FORM](#) (interested party such as NGO).

**Monitoring**

Percentage of grievances still to be resolved **more than 60 days** after acknowledgement of complaint.

**Step 5: Facilitate provision of additional assistance or other action (if required)**

If Step 3 concludes that a complaint is to receive additional assistance or benefit from some other action(s) (i.e. offer of compensation or other support), then the CLO will coordinate with ATL senior management and initiate suitable arrangements accordingly. ATL will inform LTWP Board of any material grievances.

**Step 6: Follow Up**

Where resolution is achieved and any further actions are required the CLO will follow up with claimants every three months (or as appropriate) in order to ensure that all agreed actions have been carried out.

**Step 7: Legal Redress**

If following application of the grievance mechanism the claimant is still not satisfied, the CLO should remind the claimant of their right to take legal action and document any advice given and outcomes of the legal

process. In the case of a claimant resorting to legal action, the CLO should collate all information concerning the grievance, including all actions taken to date, and provide them to the LTWP's Legal Counsel for their information / action.

**Monitoring**

Percentage of grievances (requiring resolution) resulting in legal action (target = 0%)

## H-0 Explanatory Note for Village Chiefs, Legitimate Representatives and Local Authorities

Lake Turkana Wind Power Ltd (LTWP) is committed to being an effective partner in the socio-economic development of Kenya.

Every effort is being made to avoid, reduce or mitigate / remedy potential adverse environmental and social impacts associated with the proposed Project, including provision of reasonable compensation for any lost assets or earnings and, where needed, income restoration support.

If you have any concerns regarding any aspects or consequences of the project you have the right and opportunity to express these and to seek redress where you believe you have been wrongfully affected the Project. This Grievance Mechanism provides you the opportunity to raise these concerns.

You may use this Mechanism without any prejudice to your legal and statutory rights according to the laws of Kenya.

The steps involved in the Grievance Mechanism are as follows:

### Step 1: Logging of Grievance and Confirmation of Receipt

You should raise grievances with the LTWP by any of the following methods:

- 1) Verbally, either directly, via your Village Chief or by telephone / text message, in which case you will receive an acknowledgement in the same way; OR
- 2) Ask us for help in completing the attached Grievance Form, clearly providing your name and address and nature of your complaint.

Our Team will inform you to confirm receipt of your grievance within 7 days from receipt of grievance. Please send your completed Grievance Form / letter / email to:

The Lake Turkana Wind Power office in Nairobi: P.O. Box 63716 – 00619, Nairobi or at <http://ltwp.co.ke/contact>.

Alternatively, you can complete and hand this in to the Community Liaison Officer, Mr. Stakwell Yurenimo (based in South Horr), or any of our representatives. Call the number below and we will arrange collection:

+254 720334561

[NB: Email addresses, physical address, contact numbers and names will be updated in due course.]

### Step 2. Investigation of Grievance and Seeking of Resolution

The Community Liaison Officer - or a colleague - will meet with you within 14 days of receipt of your grievance to investigate the matter and attempt to seek resolution. Where appropriate the village chief or another representative may also be involved in those investigations. If resolution is achieved at this stage it will be formally closed out and confirmed verbally or by letter.

If a resolution cannot be achieved at this stage your case will proceed to Step 3.

### Step 3: Involving LTWP Management or Third Party Authorities

In cases where the Community Liaison Officer is unable to resolve your grievance within 7 days of meeting with you, he/she will advise you on the need to involve senior LTWP (or their

representative, ATL) management or third party authorities, as appropriate and according to the nature of the grievance.

In cases of involvement of senior LTWP/ATL management the aim will be to resolve grievances within a further 14 days through a resolution meeting with you which will be attended by the Community Liaison Officer and your regional or local representative(s). Other parties may also attend as appropriate (e.g. neighbours, other witnesses).

In cases where third parties are involved, the target will be to resolve grievances within 30 days from receipt of grievance. In these cases the Community Liaison Officer will help you to write a letter to the respective authority to appeal a decision and/or to request a resolution meeting. The Community Liaison Officer will follow up every 14 days with you and with the relevant authorities to investigate and report status and, where possible, to facilitate resolution.

You can contact the Community Liaison Officer at any time during the proceedings to enquire about the status of your grievance claim. The Community Liaison Officer will respond to you as soon as possible but within 7 days.

**Step 4: Close Out**

If the Grievance is successfully resolved, the Community Liaison Officer will ensure that the agreed corrective action is documented and the grievance process is formally closed out by letter.

**Step 5: Facilitate provision of adjusted entitlements (if required)**

If Step 4 concludes that an adjustment in financial compensation or other entitlements is required, then the Community Liaison Officer will coordinate with the respective LTWP/ATL departments in order to make arrangements for this.

**Step 6: Follow Up**

Where resolution is achieved and further actions are required the Community Liaison Officer will follow up with you every three months (or as appropriate) in order to ensure all agreed actions have been carried out.

**Step 7: Legal Redress**

If following application of the Grievance Mechanism you are still not satisfied, you are free to exercise your right under Kenyan law to instigate legal action should you feel that this is necessary.

**Encl: Grievance Form**

**STAKEHOLDER ENGAGEMENT PLAN**

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<b>H1 - LTWP Grievance Form</b>	
<b>LTWP Reference:</b>	<b>Date Received:</b>
<b>Complainant / site details</b>	
Name (or withhold name if you wish to be anonymous):	
Address:	
Telephone / other contact details:	
<b>Details of complaint:</b>	
<b>Form completed by:</b>	
Name:	Position:
Location / Organisation:	
<b>Actions required and details of complaint passed to:</b>	
Name:	
Position:	
Department / organisation:	
Project / site:	
Date:	
Resolution and notification of completion to be sent on:	

***NB – The existing T-Line RAP / A-RAP version may be substituted if the format is deemed more appropriate.***

**H-2 Grievance Acknowledgement Template (use if formal reply needed, otherwise telephone)**

[LTWP wind farm / Karungu / Nairobi Address]

[Claimant Address]

[Date]

[Reference]

Dear [name of claimant]

I refer to [*correspondence / meeting*] on [*date, month*]. We understand that you wish to lodge a complaint associated with the [*Lake Turkana wind farm or a specific incident*] in relation to [*subject of grievance*].

We will attempt to contact you within 14 days of the date of this letter in order to discuss your concerns and to decide up an appropriate course of action should this be appropriate. This will be without prejudice to your statutory rights.

Sincerely yours,

Community Liaison Officer [*or other respondent*]

LTWP

**STAKEHOLDER ENGAGEMENT PLAN**

<b>H-3 Close-out Records (where legal record required)</b>		
<b>LTWP Reference Details:</b>		
Grievance Reference Number:	CLO:	
<b>Summary of Grievance:</b>		
<b>Steps Identified for Corrective Action:</b>		<b>Due Date:</b>
1		
2		
3		
4		
5		
6		
<b>Resolution Actions and Close-out:</b>		
Notes:		
<b>Complainant Signature</b>	<b>LTWP Representative Name-Signature</b>	<b>Official Witness (Title-Name- Signature)</b>
<b>Date:</b>		

**STAKEHOLDER ENGAGEMENT PLAN**

<b>H-4 Grievance Category, Type and Relevant Authority</b>			
<b>Grievance Category</b>	<b>Grievance Type</b>	<b>Example/Comment</b>	<b>Authority to be involved</b>
Complaint on pasturage	Complaints regarding loss of access to or degradation of pastureland	Where claimants contend wrongful assessment of type, amounts, condition, or date of planting (before/after cut-off date) of assets by the Census Report.	Applicable Ministry
Asset valuation	Complaints regarding valuation of assets	Where a claimant believes that their assets were undervalued relative to market price and costs of replacement (including transaction costs) – such as in the case of mature trees.	Applicable Ministry (if asset(s) valued at or below official rates)  LTWP/ATL Management (if asset(s) valued above official rates)
Asset ownership / access to communal ecosystem services (wood, pasture, water, etc.)	Complaints regarding ownership of assets	In cases of shared ownership (for example of traditional pastureland used by nomadic groups) where there is no clear ownership	Applicable Ministry
Complaints regarding employment	Complaints regarding loss of employment	Where enterprises are closed or transferred as a result of land acquisition. Complaints will likely be in relation to resettlement entitlements.	LTWP/ATL Management.
Concerns regarding employment	Complaints regarding lack of employment opportunities	Affected stakeholders / local residents claiming poor information regarding project employment vacancies.	LTWP/ATL Management
Complaints regarding construction operations	Complaints regarding nuisance or other impacts during construction works	Damage to / theft of personal property; accidents; antisocial behavior by project workers.	LTWP/ATL Management  Police
Complaints regarding cultural property	Complaints regarding archaeology, patrimony or other cultural heritage issue	Graves, shrines and sacred trees or forests.	National Museums of Kenya
Complaints regarding amenities	Complaints regarding new amenities provided by Project	Disagreement regarding new location or design of new facility (sports ground, public borehole / water bladder, etc).	LTWP/ATL Management

**STAKEHOLDER ENGAGEMENT PLAN**

<b>H-5 Example Monitoring Indicators</b>			
<b>Step</b>	<b>Indicator</b>	<b>Result against indicator</b>	<b>Corrective action</b>
1, Confirm receipt of grievance <b>Error! Reference source not found.</b>	Percentage of total number of grievances received identified as requiring resolution		
	Percentage of total number of grievances received being confirmed in writing by the Community Relations Officer within 7 days of receipt (target 100%)		
2. Investigate and seeking of resolution	Percentage of total grievances (requiring resolution) for each identified grievance category		
	Percentage of meetings with claimant held within 14 days of receipt of grievance (target 100%)		
	Percentage of grievances (requiring resolution) resolved by grievance officer within 7 days of meeting the claimant (target 100%)		
	Percentage of grievances (requiring resolution) resolved by grievance officer in more than 7 days of meeting the claimant		
3. Involve senior LTWP/ATL management or third party authorities where required	Percentage of grievances requiring the involvement of senior LTWP/ATL management resolved within 14 days from the grievance officer meeting with the claimant (target 100%)		
	Percentage of grievances requiring the involvement of senior LTWP/ATL management resolved in more than 14 days from the grievance officer meeting with the claimant		
	Percentage of grievances requiring the involvement of third party authorities resolved within 30 days from receipt of grievance (target 100%)		
	Percentage of grievances requiring the involvement of third party authorities resolved in more than 30 days from receipt of grievance		
4. Close Out	N/A		
5. Facilitate provision of adjusted entitlements (if required)	N/A		
6. Follow up	N/A		
7. Legal redress	Percentage of grievances (requiring resolution) resulting in legal action (target 0)		