



Community Engagement Plan

November 2011

Contents

1. Introduction	3
2. Stakeholders	3
3. Communication & Outreach.....	5
3.1 Community Liaison Representative	5
3.2 Methods of Communication & Engagement	6
3.3 Grievance Mechanism.....	6
4. Wind Farm Site	7
4.1 Background.....	7
4.2 During Construction Phase.....	9
4.3 During Operation Phase	10
4.4 Contractual Agreements	10
5. Road Rehabilitation Route.....	11
5.1 Background.....	11
5.2 During Construction Phase.....	11
5.3 During Operation Phase	14
5.4 Contractual Agreements	14
6. Proposed Public Consultation Schedule	15

1. Introduction

Stakeholder engagement at all levels has taken place throughout the four year development of the Lake Turkana Wind Power (LTWP) Project, namely the 300MW wind farm and 200km road rehabilitation, and the associated 428km transmission line. This Plan is applicable to the stakeholders within the wider Project area.

Public consultation formally took place during the Environmental and Social Impact Assessments (ESIA) of the wind farm¹; during the road rehabilitation² ESIA study; as a key part of the scoping and pre-identification of LTWP's Corporate Social responsibility Programme (CSR); and has continued throughout the development of the Project.

This Plan has been developed to include feedback from stakeholder consultations and as such to be fully integrated with the ongoing Project planning, design and implementation process through operations and for the life cycle of the wind farm. It provides a summary of the types of stakeholder consultation undertaken to date; outlines the procedures that govern LTWP's specific community engagement; identifies those likely to be impacted on the wind farm site and along the road rehabilitation route (during construction and operations), and proposes mitigation measures; and finally outlines how and when LTWP will seek to engage with the local communities on an ongoing basis.

LTWP will undertake engagement, with these local stakeholders, in line with its Community Engagement Policy. The proposed public consultation schedule (Section 6) has been designed with the objective to provide continuous and candid engagement with the local communities such that the Project builds upon the extensive consultation undertaken during the development phase and sets into motion a proactive engagement plan for construction and operations. This Plan, alongside the proposed CSR programme, will endeavour to the extent possible to enhance community benefits and minimise negative effects through equitable resolutions from informed participation from the community.

2. Stakeholders

The local communities (further divided into 'Project Affected People' below) are one aspect of the Project stakeholder group, and are the focus of this Plan. The table below outlines the stakeholder groups that have been consulted and summarises how those consultations were undertaken.

Stakeholders	Consultation Activities
National Public	As part of the initial stakeholder scoping engagement process, a notice was

¹ LTWP Project ESIA Study Report, July 2009.

² ESIA Report for the Proposed Strengthening Laisamis – Illaut – Kargi Junction (D371) and Kargi Junction – Loyangalani (C77) Road, July 2010; Addendum on the Road Re-Alignment to the ESIA, June 2011.

	<p>posted in the Daily National Newspaper (6 July 2009) and disclosure hand-outs were distributed during consultation. In line with community feedback, Project disclosure notices have since been updated to reflect the opinions of the community, development and design changes; these are available in LTWP offices (5th Floor, Capitol Hill Towers, Cathedral Road, Nairobi) and on LTWP website. The approved ESIA reports are also available at LTWP offices and the World Bank offices (Hill Park Building, Upper Hill Road, Nairobi).</p>
Government Agencies	<p>Meetings were held with various government agencies such as the Kenya Civil Aviation Authority, Kenya Rural Roads Authority and Kenya National Highway Authority, etc. The ESIA's were submitted to the Kenyan environmental authority, the National Environmental Management Authority (NEMA). The National Museums of Kenya Archaeology, Ornithology and Mammalogy Departments have been involved in surveying the wind farm site. Note NEMA, during their review process, also seeks review and feedback from all government specialists.</p>
NGOs (national and local)	<p>Numerous non-governmental organisations (NGOs) were identified; many attended the wind farm ESIA Stakeholder Workshop (held in April 2008), participated in the scoping pre-identification stakeholder consultation process (July 2009 – June 2010), and were consulted for specialised studies (e.g. Nature Kenya and the Royal Society for the Protection of Birds).</p>
Local Communities	<p>Contact was made with District and Sub-County level administrative government offices to inform them of the Project. Public meetings have been held with communities in the Project vicinity to advise people of the Project and to receive their comments and concerns.</p> <p>A record³, summarising the community engagement undertaken to date is maintained and will be during the lifetime of the Project.</p>
Project Affected Persons (PAPs)	<p>Community engagement takes the form of both formal and informal consultations with directly and indirectly affected people and communities to varying degrees. Formal engagement includes focused group discussions (FGDs) involving community members and other stakeholders, and key informant interviews (KIIs) involving opinion leaders and experts. Informal 'meeting and greeting' of local leaders and community members during the frequent site visits are also undertaken during the Project development and assessment process. All of the above formal, ad hoc informal, indirect and directly affected are recorded and analysed. Based on the collective feedback, LTWP has considered the concerns and expectations raised by the local communities in its design and decision-making process, and presented alternatives or mitigation in order to have an equitable solution both for the communities and the Project.</p> <p><i>Windfarm Site:</i> A clan of the Turkana nomadic pastoralists that roam the</p>

³ LTWP Community Engagement Log, October 2011.

	<p>harsh, semi-arid lands of the vast Marsabit district in search of water and grazing lands for their animals have a nomadic encampment (Sirima boma) which is located within the central area of wind farm site just off the public road (C77) that meanders across the central area of the wind farm footprint. As a sensitive receptor these transhumance pastoralists' encampment at Sirima will be impacted during the construction phase. Through the LTWP community engagement and consultation programme this nomadic clan has agreed to relocate to an alternative encampment area away from construction activities. (See Section 4)</p> <p><i>Road Rehabilitation Route:</i> There are three focal sensitive receptors along the route. A number of structures have been identified that are encroaching on the existing road reserve/wayleave at Illaut (and possibly Namarei); hence depending on the exact alignment relocation may be required. (See Section 5)</p>
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3. Communication & Outreach

3.1 Community Liaison Representative

Early on in the Project development LTWP recognised that engagement with the local communities was critical to the successful implementation of the Project. LTWP selected and hired a Community Liaison Representative (CLR), Leparsanti Lchukunye, who lives in the vicinity of the wind farm site. In addition, a second supplementary CLR, Stakwell Yurenimu, is located in the township of South Horr some 50km south of the wind farm site. These CLRs, in general terms, are locally available to engage with directly and indirectly affected neighbouring communities, administrative authorities and stakeholders.

The role of the Community Liaison Representative(s) is to:

- Be the primary contact within the Project footprint and act on all community matters for and on behalf of LTWP;
- Establish an effective communication system to keep local community, pastoralists, Administrative Authorities and/or any other stakeholders visiting the Project fully informed as to the Project status at any given time;
- Promote and maintain positive relationships with the various stakeholder groups as well as developing mutual understanding between these groups and LTWP;
- Educate the Project Management Team on local protocol and culturally sensitive matters;
- Set-up meetings with the local leaders, arrange 'barazas' (meetings open to all the community, male and female), act as translator (into Kiswahili, Turkana or Samburu), and minute meetings;
- Provide feedback to LTWP thus ensuring the best utilisation and deployment of resources, services and expertise to deal with any given situation;

- Organise and manage any local labour requirements for the Project (during the development phase);
- Liaise with various LTWP disciplines - environmental, technical, financial - as necessary to ensure coordination of any concerns is disseminated within the development team and appropriate responses received;
- Work closely with the designated LTWP Environmental Manager (during the construction and operational phases);
- Coordinate and deal with issues and queries within sphere of competence in a timely manner and, where possible, resolving concerns in a positive manner; and
- Communicate grievances to the Project Management Team and provide the LTWP response to the petitioner.

3.2 Methods of Communication & Engagement

More recently, in line with LTWP's Community Engagement Policy, updated Project information memorandums/ disclosure pamphlets have been drafted and will be made available to stakeholders within the Project footprint and to the general public:

- *LTWP Project Disclosure Document*: This provides a summary of the environmental and social studies which have been carried out on the Project. It is translated into English and Kiswahili, and will be posted at Marsabit County Council Office, Laisamis District Office, Loyangalani District Office, the offices of LTWP in Nairobi, and on LTWP's website.
- *LTWP Community Disclosure Document*: This provides a high level overview of the Project, with information directly relevant to the local communities, and with contact details of the locally based Community Liaison Representative(s). It is translated into English and the local dialects of Turkana and Samburu, and will be posted at Chiefs offices in Gatab, Loyangalani, Arge, South Horr, Sirima and Loonjorin; and at the offices of LTWP in Nairobi. It will also be handed out and presented at barazas for the three affected villages along the proposed access route and the local Sirima pastoralists.

Information will continue to be communicated through holding meetings or barazas on a regular basis in line with major Project activities, distributing disclosure pamphlets and fact sheets, and via the LTWP website.

3.3 Grievance Mechanism

Grievance redress mechanisms are essential tools for allowing affected people to voice concerns, fear, apprehension, as well as expectations, and to receive prompt responses and, if necessary, for corrective action to be taken in a timely manner. Such mechanisms are fundamental to achieving good relationships along with equitable resolutions between the affected communities and the Project as well as transparency in the Project development process.

Through meetings with the community leaders and barazas with the community members LTWP has provided, and will continue to provide, the forum for local stakeholders to raise any concerns or grievances without the fear of retribution. In addition, the CLR(s) visit the site on a

regular basis and the location is ideal as communities can either call him (Telkom Orange operate a mobile telephone communication system throughout the area of the site) or pass messages via others passing along the public road, thus allowing for meetings to be set up quickly and matters raised dealt with effectively.

Local custom is such that any public grievances are taken by the individual to their Chief and Councillors for deliberation and resolution. From there, LTWP has established that the Chief and Councillors should bring all matters to the attention of the CLR. If the matter is unresolved and the CLR cannot assist in resolving a specific issue, he will refer the matter to the Project Management Team (PMT) based in Nairobi. Following review and consideration, depending upon the nature of the matter/grievance, the PMT will provide a recommendation to the CLR as to how the issue is to be addressed and referred back through the local community governance process. The petitioner always has the right to approach/ engage the CLR/ LTWP directly if still unsatisfied. Ultimately, if still unresolved the petitioner has the right for the matter to be resolved through the courts of law.

4. Wind Farm Site

4.1 Background

Throughout the Project development, efforts have been made to engage with the different nomadic tribes that wander the vast north-eastern province of Kenya that envelops the wind farm footprint. Various meetings and discussions have taken place with the following tribes: Turkana, Samburu, Rendille, El Molo and Gabbra to identify any impacts, concerns they may have, and keep them informed of how the Project is progressing. The only people to be directly affected by the wind farm development are members of the Turkana tribe. The Turkana tribe is thought to be the ninth largest tribe in Kenya and tends to inhabit land to the west of the wind farm site; the Samburu tribe inhabit the land to the south-east of the site; and the Rendille tribe tend to populate land to the east of the site. The wind farm site concession boundary borders the pastoral area of these three tribes. The El Molo tribe is located approximately 70km north of the Project site concession area along the shore of Lake Turkana; and the Gabbra tribe located to the north-east of the site.

A nomadic clan, of the Turkana pastoralists, has been identified by LTWP having a boma encampment on the wind farm site. LTWP has sought to understand the cultures and to find out more about the nature of the community's nomadism⁴.

LTWP has been able to foster good community relations through the CLR's, Leparsanti Lchukunye (and Stakwell Yurenimu), knowledge of the local dialects and in-depth understanding of the interrelationship and conflicts between the different tribes. They have been able to seek the services of members of the various tribes for temporary unskilled jobs on site such as removing debris to create internal passage ways on site, to allow for temporary access for

⁴ Sirima Village Questionnaire (October 2010); Nomadic Movement on the Wind Farm Site (November 2010).

locating metrological wind masts, access for borehole drilling, geological core drilling for wind turbines, substation and village footprint investigations etc. In addition, 23 security guards are currently employed from the various tribes and local communities mainly to oversee and protect the contractors and equipment at site. This use of an intermediary with extensive local and cultural knowledge has allowed LTWP to employ individuals from the local communities in a balanced and socially conscious manner.

As the Project has developed it has become apparent, with the public road that meanders along the eastern and northern side of the site and the movements of nomadic pastoralist namely those that inhabit the Sirima encampment, that construction hazards on the wind farm site could potentially be hazardous for the general public, tourists and Sirima pastoralists. Meetings have been held with those pastoralists who use the Sirima encampment to find out what attracts them to the area and in particular this encampment. The response received was opportunity to stop and solicit passing vehicles for water (primarily), food and money. The Kenyan government, via the area Member of Parliament, had constructed a seasonal water catchment dam and the Catholic Church had built a school classroom thus these features, with the road nearby, offered and provided opportunities not easily accessible elsewhere in the vicinity or along their pastoral travels within the area. Taking cognisance of Sirima encampment response and considering the potential adverse impact during construction, numerous meetings were convened whereby the potential construction hazards, traffic and dust were explained. The community leaders and Sirima pastoralists, having considered the potential dangers, agreed not to utilise the Sirima area during the construction period with the proviso, that LTWP shall, during the construction period, make available a managed supply of water. LTWP agreed to this request and Sirima pastoralists have worked with LTWP in identifying a host boma encampment area nearby (1.5km north of the public road) but away from the construction activities and associated potential dangers to themselves and livestock (see Figure 1). One of the three drilled boreholes, with confirmed potable water, is located 250m from the agreed relocation area.

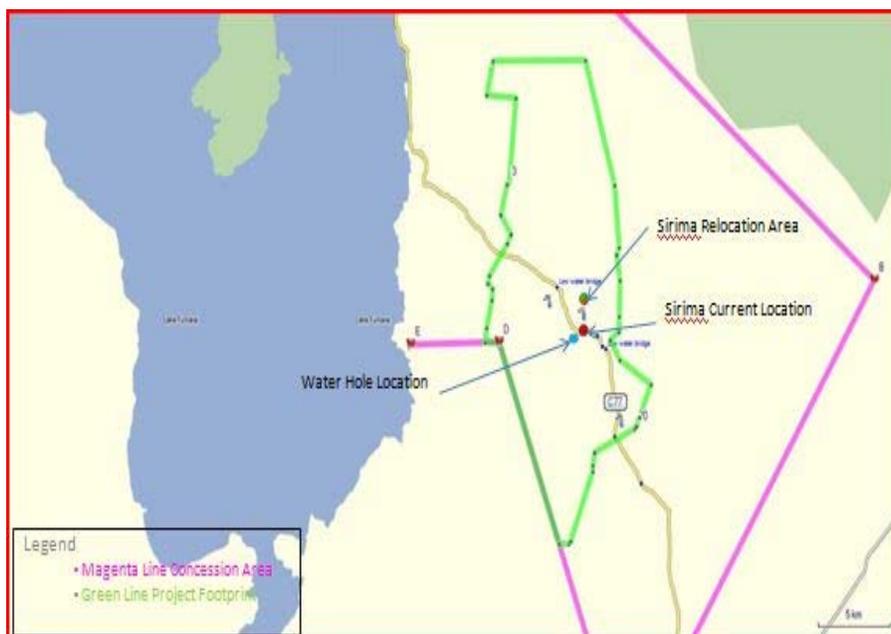


Figure 1: Map showing the position of the new host area in relation to the existing position of the encampment and the site boundaries.

As part of LTWP's proposed mitigation, a community HIV/AIDS awareness programme and Health & Safety construction traffic awareness programme is to be established in advance of construction taking place.

In addition, a comprehensive CSR programme will be undertaken to complement the Project's activities, taking special account of the nomadic nature of those who traverse the wider area; draft plans are in place for CSR activities during construction and operations.

4.2 During Construction Phase

The Sirima encampment host area is approximately 1.5km from the existing encampment location within the existing wind farm boundary.

The site has trees for shade, which is a scarcity in the area, and is 1.5km from the existing public road (C77) which traverses the wind farm site and continues on to Loyangalani town.

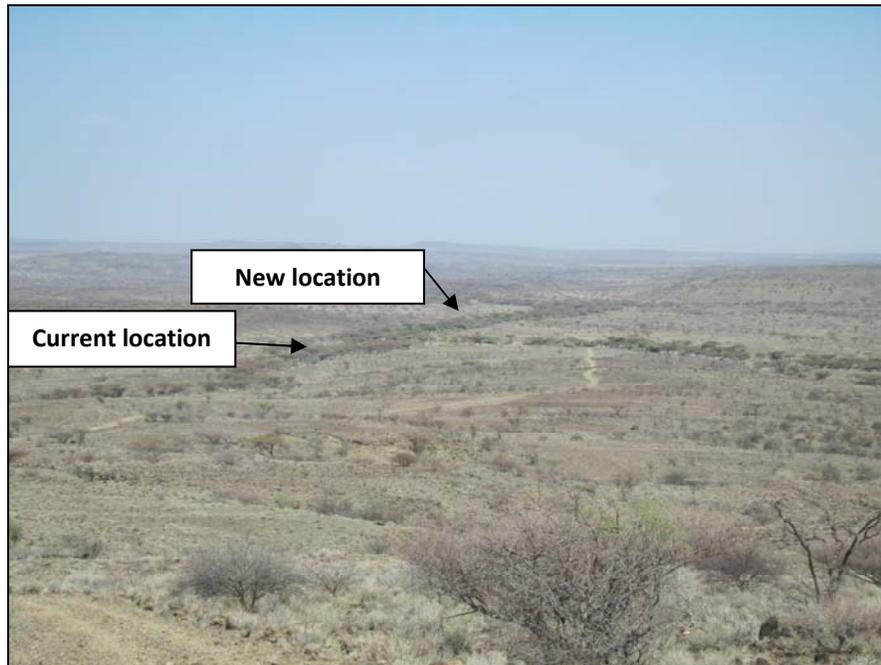


Figure 2: View of the wind farm site looking north-west; the current location and host area for Sirima encampment during construction is marked.

LTWP, following discussions with Sirima community, has agreed to provide managed potable water in order to prevent the community soliciting along the roads, which is common practice. The water will come from a newly drilled borehole located 250m from the host area.

LTWP has also offered transport assistance to the agreed encampment area. The relocation process has already commenced.

Employment, in the form of casual labour and skilled labour, will be available during the 32 month construction period. LTWP will adopt a positive discrimination policy towards local people for these roles. Cognisance will also be taken of the different tribal communities within the wind farm greater area so that recruitment is undertaken in a balanced manner. Moreover, all contractors will adhere to Kenyan employment legislation and international best practice regarding, for example, sex discrimination and child labour etc.

4.3 During Operation Phase

Following construction, there will be a limited number of roles available on the wind farm site, for example in security, village management etc.

During operations, the perimeter of the wind farm footprint will not be fenced (other than the individual transformers, workers village and the switchyard), allowing for pastoral grazing and tourism to continue as it would have done so before the implementation of the project.

A network of 33kV overhead medium voltage collection and distribution lines will traverse the wind farm site. The network design of these overhead lines has taken cognisance of the existence of Sirima pastoral encampment and has been routed so as not to cross the existing nomadic Sirima encampment. A Health & Safety high voltage awareness programme will be incorporated into the community engagement activities in advance of construction activities.

As part of LTWP's CSR initiative, once construction of the wind farm is complete, LTWP will continue to provide managed water to the local Sirima community.

4.4 Contractual Agreements

All contractors will be advised of the location of the existing and host encampments areas to ensure they are not disturbed. Each contractor will be asked to provide an Environmental and Social Management Plan (ESMP) and specific sub-plans, e.g. Labour Plans, Water Management Plans if it is their responsibility to source water, Health & Safety Plans, HIV Awareness Plan, Dust Suppression Plan, Traffic Management Plan, Accommodation Plan, Waste Management Plan etc. These plans serve to protect the communities living in the vicinity; the workers who are implementing the project; and the natural environment so that they are not adversely impacted. In addition, monitoring in accordance with the ESMPs will reveal changes and trends brought about by the presence and operations of the installed wind farm facility such that any adverse trends can be rectified immediately. Implementation of the ESMPs and continuation of the grievance procedure will be ensured through the recruitment of an Environmental Manager (in addition to the CLR) to be stationed at site during construction and operations.

The local communities will continue to be kept well briefed by LTWP and will be informed prior to any construction taking place (in accordance with the proposed Community Engagement Schedule).

5. Road Rehabilitation Route

5.1 Background

The communities identified within the vicinity of the road (from Laisamis Junction to wind farm site) are as follows:

- Laisamis Junction (outskirts of Laisamis)
- Namarei
- Illaut

The table below shows the populations of the sensitive receivers along the proposed (highlighted in green) and existing (green and orange) routes.

Settlement	Population	Households
Laisamis (<i>road rehabilitation commences at Laisamis Junction, outside of the town</i>)	(5,709)	(1,456)
Namarei (Lonyori Pichau)	2,612	598
Illaut	2,645	638
Ngurunit	3,036	682
South Horr	1,456	328
Kurungu	1,177	217
Loyangalani	7,251	1,493

Source: Extract from the Bureau of Statistics: Kenya National Population Census, 2009.

Following consultation with local stakeholders and their concerns regarding potential negative transport impacts, two route diversions were progressed in order to avoid existing residential settlements at Ngurunit, South Horr and Kurungu (marked in orange).

Loyangalani town (highlighted in red) is the nearest most northerly town to site, however the population will not be directly impacted by the construction activities since the proposed wind farm is approximately 40km south of the town.

5.2 During Construction Phase

Three communities have been identified as sensitive receivers which will be impacted by the proposed construction activities. The routes to be rehabilitated are all existing routes (some of which have become overgrown and disused). Limited resettlement will be required along the route as building has not occurred within the road reserve (5m on either side of the 6m width road), other than at Illaut (and possibly Namarei, subject to final route alignment). In addition, LTWP will implement the following measures to limit the construction impact at the identified sensitive receptors:

5.2.1 Laisamis Junction

The road rehabilitation commences outside of Laisamis town, at Laisamis Junction. There is a school, Crisco Primary School, the site boundary of which is 45m from the road (Figure 3 & 4). Adjacent to the school, speed retardation methods should be implemented to reduce vehicle speed (e.g. erecting sign posts); if deemed necessary a patrol person could be stationed at Laisamis Junction to allow safe passage crossing the road as the school children traverse between the school and Laisamis' main trading centre.



Figure 3: View east from Laisamis Junction along the road rehabilitation route. Crisco School can be seen in the distance.



Figure 4: Crisco Primary School.

5.2.2 Namarei

Namarei centre has a population of 2,600. In addition there is a school, Ngulan primary school (Figure 5), with a pupil population of 170, located 100m from the route. Speed retardation methods should be implemented to reduce vehicle speed in this area (e.g. erecting sign posts, monitoring, policing and if deemed necessary a patrol person to ensure safe passage for those crossing the road). Depending on the exact alignment of the road there is one structure which may need to be moved.



Figure 5: Ngulan primary school in distance

(picture taken from roadside).

5.2.3 Illaut

The population at Illaut is 2,600. There are a number of sensitive receivers, in the form of manyattas, near the road at Illaut centre (Figure 6). It is anticipated that less than 6 structures which are currently encroaching on the road reserve would need to be relocated. Once the road contractor, Civicon, has confirmed the exact alignment of the route an Abbreviated Resettlement Action Plan (RAP) will be undertaken for the structures squatting on the road reserve at Illaut.

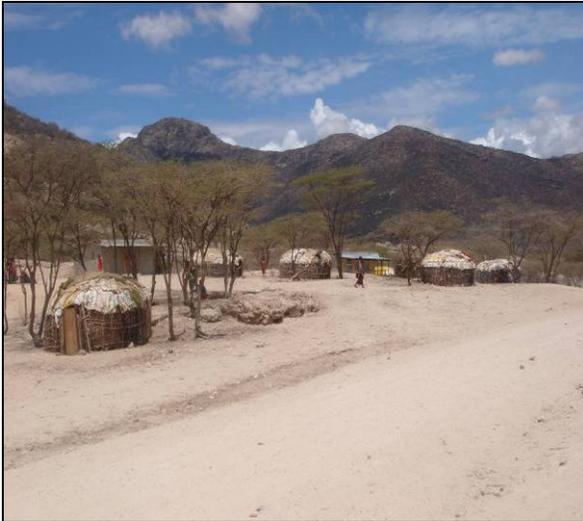


Figure 6: Manyattas at Illaut.



Figure 7: Structures which may need to be relocated depending on exact path of road.

Illaut primary school is 100m from the route and has a population of 250 pupils (Figure 8). Adjacent to the primary school and trading centre speed retardation methods should be implemented to reduce vehicle speed (e.g. erecting sign posts, monitoring, policing and if deemed necessary a patrol person to ensure safe passage for those crossing the road) in these areas.



Figure 8: Illaut primary school 100m from the route.

5.3 During Operation Phase

Once the wind farm project has been constructed (due 17 months after road rehabilitation work has been completed), the up-keep and maintenance responsibly will revert to Kenya Rural Roads Authority and Kenya National Highway Authority.

Potable water boreholes, whether rehabilitated existing boreholes or new boreholes, used for construction water purposes along the route, will revert to the local communities for their use and maintenance. Prior to hand-over to the communities, water quality testing will be conducted and following confirmation that water is fit for human consumption; only those potable boreholes will be handed over to the communities, all others will be capped and closed.

5.4 Contractual Agreements

Once the exact route alignment is complete an Abbreviated RAP will be undertaken to identify those PAPs that will be affected at Illaut, entitlement matrix produced and cut-off date set. Following completion of the Abbreviated RAP no compensation will be issued to any future encroachers on the road reserve.

At the locations of the three identified sensitive receivers, construction mitigation measures will be implemented to protect the local communities' health and safety. These will include speed retardation methods, dust sheets or other approved mitigation provisions as deemed necessary to mitigate and protect these communities.

The communities along the road rehabilitation route will continue to be kept well briefed by LTWP and will be informed prior to any construction activities taking place (in accordance with the proposed Community Engagement Schedule).

6. Proposed Public Consultation Schedule

ACTIVITIES	2011	2012				2013				2014				2015 & Onwards			
	Q4	Q1*	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Wind Farm																	
LTWP to commence HIV/AIDS awareness & education programme																	
Barazza to announce borehole (at host site) ready for use																	
Sirima settlement to move to host area (assistance provided as required). Future meetings to then be held at host site.																	
Monthly meetings (or more frequent as required) at host site during wind farm construction																	
Awareness meeting to be held in advance of arrival of first contractors, SECO (to build village, 0.5 months post FNTF) and Vestas (Soil Survey, 2 months post FNTF)																	
Awareness meeting to be held in advance of start of constructing turbine foundations (11 months post FNTF)																	
Awareness meeting to be held in advance of start of constructing internal roads (14 months post FNTF)																	
Awareness meeting to be held in advance of start of arrival & erection of turbines (15 months post FNTF)																	
Settlement to move back to Sirima if they wish (assistance will be provided as required)																	
Formal handover of boreholes, which are no longer required, to local communities																	
Monthly monitoring meetings (or more frequent as required) during operations																	
Road Rehabilitation																	
LTWP to commence HIV/AIDS awareness & education programme																	
Abbreviated RAP for structures encroaching on existing road reserve																	
Physical relocation of PAs off road reserve																	
Speed retardation signs to be erected at sensitive receivers: Laisamis Junction, Namarei & Illaut centres																	
Monthly meetings (or more frequent as required) during road construction at Laisamis Junction, Namarei & Illaut centres. Future meetings to then be held at these locations.																	
Awareness meeting to be held in advance of arrival of first heavy equipment to wind farm site (0.5 months post FNTF).																	
Awareness meeting to be held regarding the drilling of boreholes along the route (2 months post FNTF)																	
Awareness meeting to be held in advance of start of constructing road/ borrow areas (5 months post FNTF) and appointment of Patrol Persons at the 3 centres (or as required).																	
Awareness meeting to be held in advance of start of arrival of turbines (15 months post FNTF)																	
Monthly meetings (or as required) during LTWP's maintenance of road until wind farm is constructed, concluding with handover of boreholes to local communities																	
LTWP hand over of maintenance to Kenya Rural Roads Authority & Kenya National Highway Authority																	

* Assuming Full Notice to Proceed (FNTF) to occur end of Q1 2012