



# **1,050MW Coal Fired Power Plant Stakeholder Engagement Plan**

Report Prepared for  
**Amu Power Company Limited**

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## Acronyms

Acronym	Definition
<b>AfDB</b>	African Development Bank
<b>APCL</b>	Amu Power Company Limited
<b>CLO</b>	Community Liaison Officer
<b>EMCA</b>	Environmental Management Coordination Act
<b>ESMP</b>	Environment and Social Management Plan
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>FPIC</b>	Free Prior Informed Consent
<b>I&amp;APs</b>	Interested and Affected Parties
<b>ISS</b>	Integrated safeguard Systems
<b>KPLC</b>	Kenya Power Company Limited
<b>KTL</b>	Kurrent Technologies Limited
<b>MCAs</b>	Members of the County Assembly
<b>MoEP</b>	Ministry of Energy and Petroleum
<b>NEMA</b>	National Environment Management Authority
<b>NGO</b>	Non-Governmental Organization
<b>NMK</b>	National Museum of Kenya
<b>PPA</b>	PPA Power Purchase Agreement
<b>SE</b>	Stakeholder Engagement
<b>SEP</b>	Stakeholder Engagement Plan
<b>SIA</b>	Social Impact Assessment

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## **1 Introduction**

This Stakeholder Engagement Plan (SEP) has been prepared as part of Amu Power Company Limited's (APCL) Environmental and Social Impact Assessment (ESIA) for the proposed development of a Coal-fired Power Plant with a gross output of 1,050MW in the Manda Bay area of Lamu County, Kenya.

APCL appreciates the necessity for meaningful participation, consultation, and collaboration with individuals, groups, communities and institutions that have an interest in, or are likely to be impacted by the proposed project. This SEP demonstrates APCL's strong commitment to transparent, meaningful and effective stakeholder engagement throughout the project lifecycle. Equally, APCL aims at adhering to applicable National legislation and international best practice standards through the preparation and implementation of this SEP.

The primary purpose of this plan is to define a stakeholder engagement, public information disclosure and consultation process that will be implemented throughout the project lifecycle. It highlights the strategies to be implemented by APCL for stakeholder communication. The end goal is to build a trusting relationship with project stakeholders based on a transparent and timely supply of information and open dialogue.

APCL proposes to develop a Coal-fired Power Plant with a gross output of 1,050 MW in the Manda Bay Area of Lamu County, Kenya.

This Stakeholder Engagement Plan (SEP) has been prepared in support of the Environmental and Social Impact Assessment (ESIA) for the proposed project and is aligned with the Kenyan Constitution; AfDB's provisions for stakeholder consultation and participation, among other international best practice standards. The intensive communication and the proactive approach towards stakeholder engagement are of great importance to APCL which holds the overall role for the compliance of the activities herein with the respective environmental and social norms.

This stakeholder engagement plan will be based on:

- Identification of key stakeholders, and mechanisms for stakeholder feedback and information sharing
- Provision of timely information about the project to potentially impacted communities and other stakeholders
- Provide an up-front indication of issues which may prevent project continuation, resulting in costly delays or which may result in enhanced and shared benefits
- Provide an opportunity to incorporate stakeholder feedback into project decision making and design phase
- On-going integration of public issues, technical assessment and client requirements

## **1.1 Objectives of this SEP**

APCL appreciates the essence of seamless stakeholder engagement throughout the project lifecycle. This SEP is designed to articulate the principles, procedures and approaches that will guide APCL's engagement with stakeholders. This plan is a living document that will be regularly reviewed, improved and adapted to evolving stakeholder needs and project environment. APCL will make deliberate efforts to assimilate this SEP into the company's operations.

This SEP is founded on the principles of free, prior, informed and meaningful consent. Its goals are to:

1. Identify and prioritize key stakeholders groups;
2. Outline the principles, timelines, procedures and approaches that will direct APCL's engagement with stakeholders;
3. Improve decision-making and build understanding by actively involving project stakeholders in two-way communication;
4. Describe regulatory, lender, and other requirements for stakeholder participation, consultation and disclosure;
5. Comply with the ESIA Regulatory requirements and best practice standards on the public participation process;
6. Ensure transparency and involvement of stakeholders in assessing and managing the potential environmental, socio-economic, and health impacts of the proposed 1,050 MW Coal Power Project;
7. Respond to stakeholder concerns and grievances with a view of seeking mutually agreed resolutions in a timely, well-structured manner;
8. Help manage risks, concerns and expectations through ongoing dialogue;
9. Provide APCL with a better understand of the concerns and expectations of stakeholders, and the opportunities to increase project value to the local community;
10. Describe the internal resources and responsibilities for the implementation of stakeholder engagement activities; and
11. Describe how the effectiveness of the SEP will be monitored and how the lessons learned will be recorded with the aim of improving stakeholder engagement activities during the lifecycle of the project.

Stakeholder engagement is an iterative process and will require regular reviews and updates to adapt it to evolving stakeholder needs and project environment. It is recommended that APCL facilitate periodic reviews and improvements of the SEP based on stakeholder input and lessons learnt. Continuous monitoring and evaluation of the stakeholder engagement process is vital to ensure the SEP remains relevant and effective. APCL also bears the fundamental role to integrate and align this SEP to company operations and strategy.



## **1.2 Project Background**

AMU Power Company Ltd. (APCL) is a Special Purpose Vehicle by Gulf Energy Limited and Centum Investment Company Limited. In September 2014, the Ministry of Energy and Petroleum (MoEP) awarded APCL the bid to develop a 1,050 MW gross output coal-fired power plant at Lamu County under a Build, Own & Operate (BOO) regime.

The implementation of this project is part of the Government of Kenya's Least Cost Development Plan for power generation to bring down the cost of power via a more stable, reliable platform. The plan envisions the addition of 5000MW+ of reliable electricity to the national grid by the year 2018. Once complete the Project will constitute approximately 36% of the new combined grid capacity as well as bring down the average cost of generation for Kenya Power and Light Company ("KPLC"). This is in line with Kenya's Vision 2030, which recognizes reliable and cheap energy as one of the foundations for economic growth and essential for making Kenya a middle-income country by 2030.

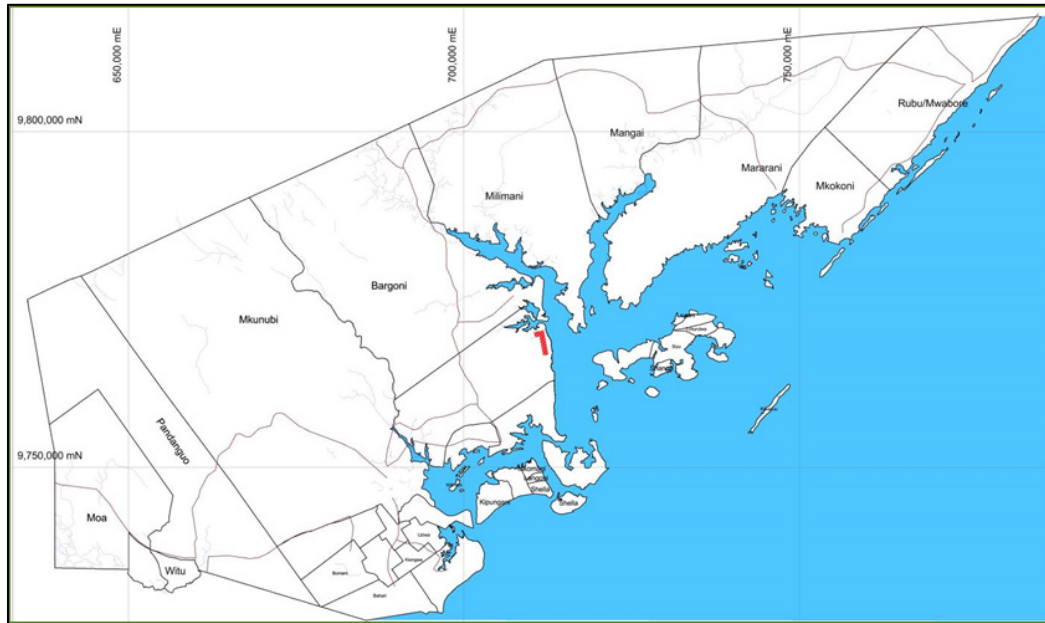
The Project is part of the wider regional initiative to develop Lamu County into a trade and commercial hub to service East and Central Africa through the Lamu development initiative, LAPSET- Lamu-Southern Sudan-Ethiopia Transport (LAPSET) Corridor- linking and strengthening the three economies.

## **1.3 Project Site**

The project is located along the Indian Ocean within Manda Bay in Lamu County, Kenya as shown in Figure 1-1. It lies within the delineated Lamu Port-South Sudan-Ethiopia Transport Corridor (LAPSET) zone.

The site is situated to the north of New Lamu Port, and is adjacent to the west bank of Wange Creek, north side of Manda Bay, with Pate Island and Siyu Channel on the east side. Manda airport, located in Manda Island, is to the south of the project site with a straight-line distance of about 18 kilometers. Lamu old town is to the southeast of the project site with a straight-line distance of about 23 kilometers. The site is accessible by air, sea as well as road off the main Lamu – Mombasa highway.

**Figure 1-1: Map of Lamu County the proposed project site**



## **1.4 Project Design Elements**

Amu Power Company Limited will build, own and operate the proposed power plant for a stipulated 25 year-period. The plant will utilize Super-critical technology in the production of 1,050 MW of electricity. Produced power will be evacuated through 400 kV KETRACO built transmission line terminating at East Nairobi. The fuel source for the plant will be pulverized coal initially imported from South Africa, and later sourced locally based on availability.

The power plant will include installation of a coal handling facilities, Power Island & ancillaries, 400 kV switch yard, ash disposal facilities, administrative offices, residential colony and other associated infrastructure. Specifically, the main project components will include:

- Three (3) steam turbine driven generator sets with individual installed capacity of 350 MW and a total installed capacity of 1,050 MW and associated auxiliaries;
- A dedicated black-start diesel generator;
- Station cranes and lifting equipment;
- Three boilers and auxiliaries;
- Indoor switchgear at generator voltage;
- 400 kV switchgear and cabling;
- Neutral earthing switchgear;
- Control, metering and protection equipment;
- 20 kV/400kV step-up transformers;
- 400 kV/ 6600 V station transformers;

- 415 V switchgear and motor control centres;
- 24V DC and 110V DC batteries, chargers and distribution equipment;
- Lighting and Telephone system;
- Coal jetty, receipt, storage and transfer system;
- Water storage and pumping system;
- Fire detection, protection system and SCADA system;
- Sea water desalination and demineralization water system;
- Ash Handling Plant and Ash Yard; and
- Industrial Waste Treatment Plant.

## 1.5 Potential environmental and social impacts

The potential impacts of the proposed project on the biological, physical and social environments are detailed and analyzed at length in the main ESIA report accompanying this SEP. This section presents an overview of the potential environmental and social issues associated with the implementation of the proposed project. Table 1-1 summarizes the key possible social and environmental issues during the different phases of the project, as determined from the ESIA studies.

**Table 1-1: Environmental and social concerns**

Affected environment	Possible environmental/social concern
Soil and Geology	<ul style="list-style-type: none"> <li>• Erosion</li> <li>• Soil compaction</li> <li>• Spills and leaks of hazardous materials</li> <li>• Disposal of waste</li> </ul>
Water quality	<ul style="list-style-type: none"> <li>• Modification of drainage patterns</li> <li>• Increased run-off due to soil compaction and changes in vegetation cover</li> <li>• Modification of stream and rivers due to crossings</li> <li>• Run-off carrying sediments and contaminants</li> <li>• Spills and leaks of hazardous materials</li> </ul>
Air quality	<ul style="list-style-type: none"> <li>• Equipment emissions and fugitive dust</li> <li>• Increased traffic</li> </ul>
Noise and vibration	<ul style="list-style-type: none"> <li>• Heavy equipment</li> <li>• Disruption and blast</li> <li>• Increased traffic</li> </ul>
Aesthetic resources	<ul style="list-style-type: none"> <li>• Disruption of views</li> <li>• Degradation of landscapes</li> </ul>

Affected environment	Possible environmental/social concern
	<ul style="list-style-type: none"> <li>• Use of night-time lighting</li> </ul>
Terrestrial flora and associated ecosystems	<ul style="list-style-type: none"> <li>• Deforestation and wetland destruction</li> <li>• Spread of invasive species</li> <li>• Wildfires</li> </ul>
Terrestrial fauna	<ul style="list-style-type: none"> <li>• Loss and/or fragmentation of habitat</li> <li>• Disruption and dislocation of local and/or migratory wildlife, including disturbance of migratory corridors and breeding, spawning, nesting and calving areas</li> <li>• Poisoning via contamination of waste, spills and leaks of hazardous materials</li> </ul>
Aquatic species and associated ecosystems	<ul style="list-style-type: none"> <li>• Run-off carrying sediments contaminants</li> <li>• Poisoning via contamination of waste, spills and leaks of hazardous materials</li> </ul>
Threatened and endangered species	<ul style="list-style-type: none"> <li>• Reduction/disappearance of species and habitats</li> </ul>
Cultural resources	<ul style="list-style-type: none"> <li>• Destruction of cultural heritage</li> </ul>
Resettlement and relocation	<ul style="list-style-type: none"> <li>• Displacement and relocation of current settlements</li> </ul>
Socio-economic conditions	<ul style="list-style-type: none"> <li>• Disruption of people's livelihoods</li> <li>• Individual income increase by direct and indirect employment</li> <li>• Increased purchases and other economic activities from local business</li> </ul>
Health	<ul style="list-style-type: none"> <li>• Hazardous jobs</li> <li>• Occupational diseases</li> <li>• Impacts on public health</li> </ul>

This SEP is structured as follows:

**Section 1:** This introductory section provides a background to the Stakeholder Engagement Plan and the project including proponent details, project design elements, proposed project site and the possible project impacts. The ESIA provides recommended enhancement and mitigation measures for the identified potential impacts.

**Section 2:** This section outlines the national and international policies, legislation and best practice standards that have guided the preparation of the SEP. The key national regulations applicable to this SEP are: The Constitution of Kenya which provides the overarching framework for the implementation of the proposed project; Energy Policy; Gender Policy; National Museums and Heritage Act; National Land Policy; County Governments Act; and the Environment Policy. The applicable international best practice standards include the Energy Sector Policy of the African Development Bank (AfDB) and the AfDB integrated Safeguard System.

**Section 3:** This section highlights the stakeholder engagement activities that have been undertaken to date. This comprises of engagement activities conducted prior to as well as during the ESIA phase including stakeholder identification and subsequent consultations. The mediums of engagement utilized are also explained including the locations and schedule of activities. This section also highlights the key stakeholder views and concerns collated during the engagement activities which can be summarized as follows:

- Poor access to portable water;
- Poor education infrastructure, performance and high illiteracy levels;
- Poor health infrastructure;
- Potential loss of livelihoods as a result of project activities;
- Equitable access to available employment and business opportunities;
- Fair resettlement and compensation for affected land owners;
- Poor road network;
- CSR program and benefit sharing mechanism; and
- Effective mitigation of adverse project related impacts with emphasis on health and the economy of the project region.

**Section 4:** This section describes the project stakeholders identified at local, county and national levels. The stakeholders are grouped into the three categories namely: private sector (PRS); public sector (PUS); and civil society (CIS). This section also includes the stakeholder database, maps and analysis matrices.

**Section 5:** Section five details the stakeholder engagement programme. The proposed SE approach is delineated into 5 levels namely Inform → Consult → Involve → Collaborate → and Empower. The mediums for stakeholder engagement are also explicated under three main categories. These include mediums recommended for stakeholder meetings, mediums for media-based engagement, and mediums for audio, visual and written engagements. In total, 13 different categories of mediums have been proposed to be used with implementation of the stakeholder engagement activities.

The programme is cognizant of the existence of vulnerable stakeholder groups and provides strategies for promoting their active and meaningful participation. Such strategies include Informed Consultation and Participation (ICP), Employment equity and positive action, Requisite committee representation and Sustainable development initiatives through APCL's CSR programme.

**Section 6:** In this section, responsibilities for the preparation, management, and coordination of this SEP and its integral tasks are discussed. This section focuses on the institutional accountabilities of the proponent and the independent consultants engaged for the ESIA. Core functions, roles and responsibilities for the implementation of the SEP are described at length under management functions (section 9) of this report.

**Section 7:** Section seven provides an overview of the Grievance mechanism (GM) which is extensively elaborated upon in a separate document accompanying this SEP. The GM provides a formal procedure for APCL to manage complaints/grievances from communities and other local stakeholders that could potentially arise from the development of the proposed power plant.

**Section 8:** This section provides the monitoring and reporting framework for the stakeholder engagement plan. Emphasis is placed on the significance of reporting back to

stakeholders and ensuring stakeholder participation in SEP monitoring. The recommended channels for stakeholder participation include:

- Grievance mechanism (which includes an appeals Committee with requisite representation from community members)
- Access to project offices
- Regular stakeholder consultation forums
- Social media channels and
- Suggestion boxes

The framework provides two levels of monitoring and reporting. The first level involves procedures by internal actors (APCL staff and management) while the second level involves monitoring by external/third parties (community/stakeholders, lenders, and lead agency / consultants).

**Section 9:** This section defines the proposed organizational functions and responsibilities, organizational structure and management functions necessary for the effective implementation of the SEP. It outlines approaches to integrate stakeholder engagement activities into APCL's management strategy. This includes a proposed organizational structure with integral roles for management and implementation of stakeholder engagement and capacity building strategies for stakeholder engagement.

## **2 Project regulatory framework**

APCL is committed to continuous operational excellence, unwavering environmental management and stringent adherence to quality. In this effort, APCL aims to comply with all applicable national legislations as well as adherence to international best practices and standards. The regulatory framework that will guide APCL's stakeholder engagement is outlined below.

### **2.1 Key applicable local policy and legal context**

#### **2.1.1 The Constitution of Kenya**

The constitution of Kenya will provide the overarching framework for the implementation of the 1,050MW Coal Power Plant project and all related stakeholder engagement activities. APCL will abide by the provisions of the Constitution in ensuring that:

- Fundamental Rights and Freedoms of all individuals impacted by the project are observed and protected
- Public participation is encouraged in the management, protection and conservation of the environment
- The principles and values of good governance, integrity, transparency and accountability and sustainable development, are observed including human dignity, equity, social justice, inclusiveness, equality, human rights, sustainable development and non-discrimination.

Under the constitution, there are a variety of laws, regulations, orders, and acts applicable to stakeholder consultation and engagement. These include:

#### **2.1.2 The Energy Policy**

The energy policy seeks to ensure affordable, competitive, sustainable and reliable supply of energy for the Country, produced at the least cost while protecting and conserving the environment. The policy recognizes coal as an affordable, competitive, reliable and easily accessible source of energy for electricity generation for the Country. The policy promotes the exploitation of coal in the efforts to add at least 5000MW+ of reliable electricity to the national grid by the year 2018.

The policy provides guidance on the enforcement of environmental and safety regulations by which APCL will abide. It stipulates the requirements for investigating complaints related to the power plant and denotes the process for compulsory land acquisition and compensation for power generating plants. The policy prescribes the manner with which licenses shall be obtained for generating, transmitting and distributing electricity.

### **2.1.3 Gender Policy 2011**

The overall goal of this Policy is to mainstream gender concerns in the national development process in order to improve the social, legal/civic, economic and cultural conditions of women, men, girls and boys in Kenya.

The policy aims at ensuring gender equality and women's empowerment and mainstreaming of needs and concerns of women, men, girls and boys in all sectors of development in the country so that they can participate and benefit equally from development initiatives.

This policy will guide APCL gender mainstreaming efforts in employment and recruitment of construction and power plant works as well as the allocation of other opportunities such as education support, CSR initiatives among others. This policy will guide APCL to provide a work environment that is safe and conducive to women and men, considering gender-disaggregated differences and vulnerabilities. This for example applies to onsite worker's sanitation facilities, where women should have separate facilities from men

### **2.1.4 National Museums Heritage Act, Chapter 216, 2009**

An Act of Parliament to consolidate the law relating to national museums and heritage; to provide for the establishment control, management and development of national museums and the identification, protection, conservation and transmission of the cultural and natural heritage of Kenya; to repeal the Antiquities and Monuments Act and the National Museums Act; and for connected purposes

### **2.1.5 National land policy**

The overall objective of the National Land Policy is to secure rights over land and provide for sustainable growth, investment and reduction of poverty in line with the Government's overall development objectives. The policy provides a framework of policies and laws designed to ensure the maintenance of a system of land administration and management that provides:

- All citizens with the opportunity to access and beneficially occupy and use land;
- Economically viable, socially equitable and environmentally sustainable allocation and use of land;
- Efficient, effective and economical operation of land markets;
- Efficient and effective utilization of land and land-based resources; and
- Efficient and transparent land dispute resolution mechanisms.

The requirements of this policy are expected to be fulfilled in the process of acquiring the required project site land APCL expects to lease from the Government of Kenya (GoK), which holds the mandate over the process of acquiring the required project site land. GoK will facilitate the effective RAP process that will guide land acquisition before development to mitigate asset loss, and where unavoidable, to provide compensation. This is to be achieved through extensive stakeholder engagement meetings to ensure that the local communities are aware and agree with the intended land use, the safeguards that will be put in place to ensure environmental and social protection as well as the proposed RAP conditions.



### **2.1.6 County Government Act 2012**

This is an ACT of Parliament that gives effect to Chapter Eleven of the Constitution; to provide for county governments' powers, functions and responsibilities. It also provides for a wide variety of matters relating to public administration at local level such as civic participation, access to information, public communication and the protection of minorities. Through this policy, APCL is inclined to involve the County government in decision making as key stakeholders. APCL also bears the responsibility to comply with Lamu County legislations as well as complement the County's efforts with regard to the CIDP.

### **2.1.7 Environment Policy**

The Environment Policy proposes a broad range of measures and actions responding to key environmental and social issues and challenges. It seeks to provide a framework for an integrated approach to planning and sustainable management of natural resources in the country. It recognizes the various vulnerable ecosystems and proposes various policy measures to mainstream sound environmental management practices. This policy stipulates the ESIA requirement for the proposed project, along with the requisite public consultations.

## **2.2 International best practice**

The following international best practice principles and guidelines have been considered in the development of this SEP.

### **2.2.1 Energy Sector Policy of the African Development Bank (AfDB)**

This policy provides a general framework for the Bank Group's energy sector operations by: (1) supporting Regional Member Countries (RMCs) in their efforts to provide all of their populations and productive sectors with access to modern, affordable and reliable energy services and; (2) helping RMCs develop their energy sector in a socially, economically and environmentally sustainable manner. This policy will guide APCL's stakeholder engagement undertakings as regards: gender mainstreaming; knowledge transfer and capacity building of the local communities; promotion of participatory approaches in social and environmental responsibility and; in promoting national and county government participation in the decision making process for the Coal Power Plant.

### **2.2.2 AfDB Integrated Safeguards System**

The AfDB ISS is designed to promote the sustainability of project outcomes by protecting the environment and people from the potentially adverse impacts of projects. The Bank requires that borrowers/ clients comply with these safeguards requirements during project preparation and implementation. On stakeholder consultation and participation, the safeguard states that:

The borrower or client is responsible for conducting and providing evidence of meaningful consultation (i.e., consultation that is free, prior and informed) with communities likely to be affected by environmental and social impacts, and with local stakeholders, and also for ensuring broad community support

Specifically, the APCL's stakeholder engagement process will be guided by AfDB ISS 1 and 2 as outlined below.

### **2.2.2.1 Operational safeguard 1 – environmental and social assessment**

Operation Safeguard 1 sets out the Bank's overarching requirements for APCL to identify, assess, and manage the potential environmental and social risks and impacts of the proposed project. Specifically, with regard to stakeholder engagement APCL is required to:

- Identify and assess the environmental and social impacts and risks, including those related to gender, climate change and vulnerability of the proposed project;
- Avoid or, if avoidance is not possible, minimize, mitigate and compensate for adverse impacts on the environment and on affected communities;
- Provide for stakeholders' participation during the consultation process so that affected communities and stakeholders have timely access to information in suitable forms about the proposed project, and are consulted meaningfully about issues that may affect them;
- Ensure the effective management of environmental and social risks in projects during and after implementation

### **2.2.2.2 Operational safeguard 2: Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation**

It relates to Bank-financed projects that cause the involuntary resettlement of people. It seeks to ensure that when people must be displaced they are treated fairly, equitably, and in a socially and culturally sensitive manner; that they receive compensation and resettlement assistance so that their standards of living, income-earning capacity, production levels and overall means of livelihood are improved; and that they share in the benefits of the project that involves their resettlement.

Specifically, with regard to APCL stakeholder engagement, this safeguard seeks to ensure that the people who will be displaced by the proposed project are meaningfully consulted and given opportunities to participate in the planning and implementation of resettlement programmes. As part of the proposed project development, APCL will lease the required project site land from the Government of Kenya. While the resettlement and compensation of Project Affected Persons will remain under the government's mandate, APCL will support and facilitate the RAP to ensure the process is fluid and effective. APCL will ensure open and inclusive consultations with stakeholders and community members on the RAP exercise. These consultations will be guided by AfDB consultation and participation guidelines to ensure:

- Appropriate notice to all potentially affected persons that resettlement is being considered and that there will be public hearings on the proposed plans and alternatives;
- Effective advance dissemination by the authorities of relevant information, including land records and proposed comprehensive resettlement plans specifically addressing efforts to protect vulnerable groups;

- A reasonable time period for public review of, comments on, and/or objection to any options of the proposed plan; and
- Public hearings that provide affected persons and/or their legally designated representatives with opportunities to challenge the resettlement design and process, and/or to present and discuss alternative proposals and articulate their views and priorities

### **2.2.3 IFC Performance Standards**

The International Finance Corporation (IFC) is an international financial institution, which offers investment, advisory, and asset management services to encourage private sector development in developing countries.

The Performance Standards are directed towards clients, providing guidance on how to identify risks and impacts, and are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities. The ESIA predicts and assesses the project's potential impacts and risk. The SEP is a critical component to the ESIA because it establishes and maintains constructive relationships between affected communities and the proponent.

The key principles of effective stakeholder engagement as will be undertaken by APCL are summarized as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;
- Respect for local traditions, languages, timeframes, and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen and to have their issues heard and addressed;
- Inclusiveness in representation of views, including ages, women and men, vulnerable and/or minority groups;
- Processes free of intimidation or coercion;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating where appropriate and feasible, feedback into project or program design, and reporting back to stakeholders

The following performance standards give guidance on stakeholder engagement:

- ✓ PS 1: Assessment and Management of Environmental & Social Risks and Impacts
- ✓ PS 5: Land Acquisition and Involuntary Resettlement
- ✓ PS 8: Cultural Heritage

In compliance with the IFC standards, the following considerations have been made:

#### **Stakeholder Analysis and Engagement Plan**

This Stakeholder Engagement Plan (SEP) has been developed for the proposed project. It is scaled to the proposed project's risks and impacts and development stages, and is tailored to the characteristics and interests of the Affected Communities

#### **Consultation and Participation**

APCL has conducted Informed Consultation and Participation with the Affected Communities. This will be an ongoing activity that APCL will endeavor to uphold throughout the project lifecycle.

#### **Disclosure of Information**

APCL has provided, and will continue to update affected communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process as outlined in this SEP; and (v) the grievance mechanism.

#### **Grievance Mechanism**

A comprehensive Grievance Mechanism has been prepared to receive and facilitate resolution of affected communities' concerns and grievances about APCL's environmental and social performance

#### **Ongoing Reporting To Affected Communities**

APCL will provide periodic reports to the affected communities that describe progress with implementation of the project action plans on issues that involve ongoing risk to or impacts on affected communities and on issues that the consultation process or grievance mechanism have identified as a concern to those communities.

### **3 Ongoing stakeholder engagement activities**

Amu Power Company Limited has established stakeholder relations with representatives from National and County Government, civil society as well as the public in the communities proximate to the project area who are likely to feel most project impacts. The following are the key stakeholder engagement activities conducted to date:

#### **3.1 Stakeholder Identification and Analysis**

Stakeholder identification and analysis is an essential component of effective and meaningful stakeholder engagement activities. A comprehensive database of potential stakeholders was generated to include private sector actors, public sector actors, civil society agents and key individuals and groups representing the general public. In November 2014, a stakeholder identification, analysis and mapping exercise was conducted. The objective of the analysis was to provide a general overview of all stakeholders and their stake in the project. Specifically, the stakeholder analysis sought to;

- Identify institutions, groups, and individuals likely to impact or be impacted by the proposed project
- Categorize identified stakeholders in relation to their operation scope and mandate
- Assess the identified stakeholders' interests, significance and influence in relation to the proposed project
- Assess relationships between the stakeholders

The generated stakeholder database, maps and analysis matrix are detailed under section 4 of this report. These will be continuously updated throughout the project life to reflect changes in the project environment.

#### **3.2 Disclosure of information**

Following the stakeholder identification and mapping, the proponent conducted information disclosure activities. These activities sought to:

- Present APCL strategy and project justification
- Present the components of the proposed power plant
- Present roles and scope of Africa Practice involvement
- Present the Environment and Social Impact Assessment (ESIA) process for the project
- Seek initial views and comments about the project and the ESIA process; and
- Inform about the Stakeholder Engagement Plan (SEP) for the project

### **3.2.1 Modes of information dissemination**

APCL engaged the identified stakeholders through:

1. One-on-one consultations with key stakeholder representatives
2. Focus group workshops
3. Community public meetings
4. Media briefings and
5. Distribution of the project Background Information Document (BID). The BID outlined:
  - ✓ Proponent details
  - ✓ Technical description of the project and its impacts
  - ✓ A description of the ESIA process
  - ✓ A description of modes of stakeholder participation

In addition, the following support materials were prepared for stakeholder dialogue:

- Stakeholder invitation letters
- Public meeting notices (English and Swahili)
- Stakeholder registration logs and
- Power point presentations of the proposed 985.1 MW Lamu Coal Power Project

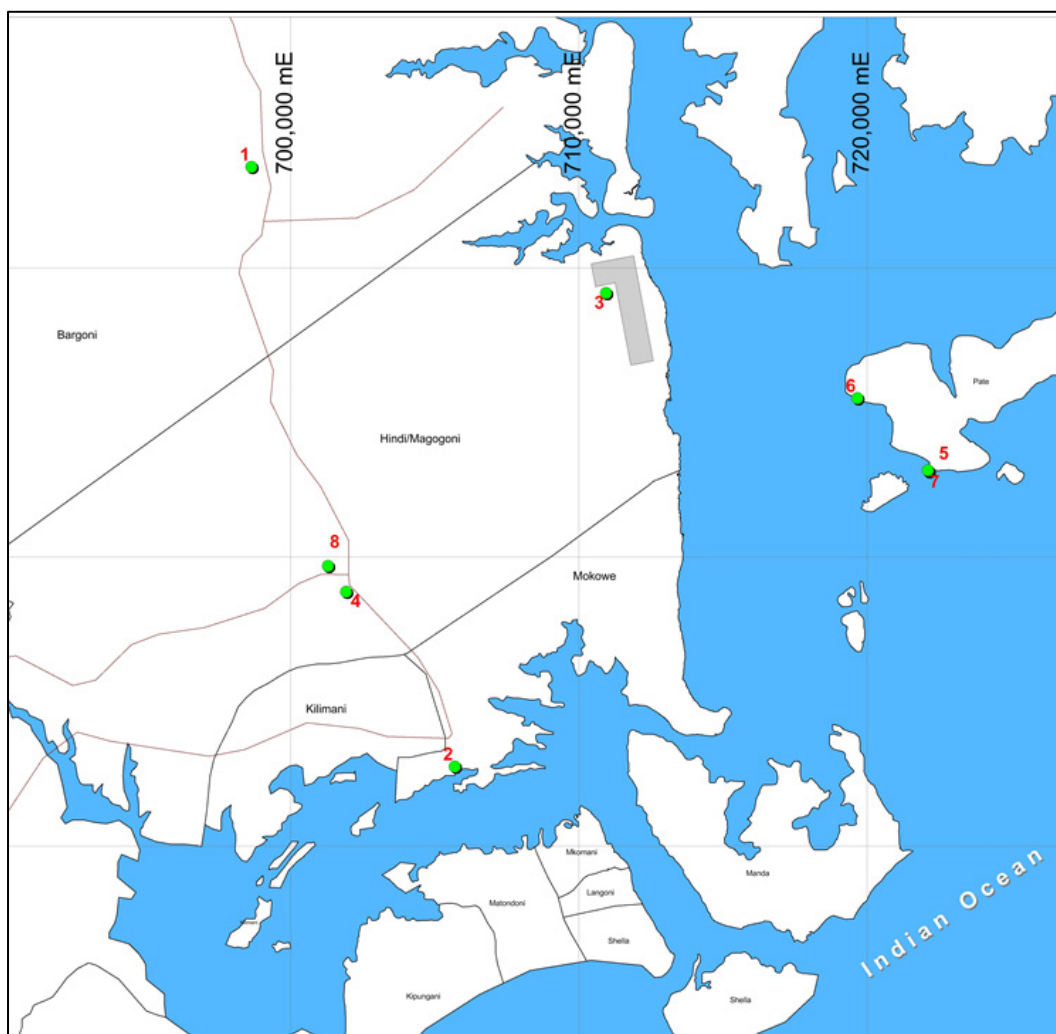
### **3.2.2 Information Dissemination Meetings**

Amu Power Company Limited conducted information dissemination meetings in Nairobi (for key ministry and state cooperation representatives), in Lamu town as well as within communities neighboring the proposed project site. These included: Kwasasi (proposed project site area); Mtangawanda, Pate Island; Pate Town, Pate Island; Bargoni; Mokowe; and Hindi. The public meeting locations were selected based on the following factors:

- Proximity to proposed project site
- Areas most likely to be adversely affected by potential impacts
- Areas of significant commercial, administrative, and social value
- Areas recommended as convenient congregation points for majority of the targeted stakeholders
- Highly populated areas

Figure 3-1 shows the locations where the public/stakeholder consultation meetings were held in the project area of influence.

Figure 3-1: Public meeting locations (indicated in numbers)



### 3.3 Schedule of stakeholder engagement activities for the ESIA and Project preparation phase

Table 3-1 presents a summary of the stakeholder engagement activities conducted.

**Table 3-1: Schedule of stakeholder engagement activities**

Date and Place	Stakeholder group and meeting purpose
9th January 2015 Subira Hotel, Hindi, Lamu mainland	Ward administrator, Hindi and Senior Chief, Village headmen, community leaders (from affected communities) and mangrove cutters representative. Project Introductory meetings
9th January 2015 Lamu Museum, Lamu Island	National Museum of Kenya representatives (Lamu museum) Project Introductory meetings

Date and Place	Stakeholder group and meeting purpose
9th January 2015 Lamu Island	Assistant County Commissioner, Lamu County Project Introductory meeting
24th January 2015 Mwana Arafa Restaurant Gardens, Lamu Island	Save Lamu Representatives Workshop
24th January 2015 Mwana Arafa Restaurant Gardens, Lamu Island	Lamu Youth Alliance Representatives Workshop
25th January 2015 Mwana Arafa Restaurant Gardens, Lamu Island	Male Opinion leaders Representatives Workshop
25th January 2015 Mwana Arafa Restaurant Gardens, Lamu Island	Female opinion leaders Representatives
26th January 2015 Bargoni Primary School	Bargoni and Ngini Residents Dissemination and consultation public meeting
26th January 2015 Mokowe Primary School	Mokowe Residents Dissemination and consultation public meeting
27th January 2015 Ardhi House, Mokowe, Lamu	Lamu County Land Management Board Project Briefing Meeting
27th January 2015 Kwasasi (Proposed project site)	Kwasasi Residents Dissemination and consultation public meeting
27th January 2015 Hindi Digital Sports Centre and News Hindi, Lamu mainland	Hindi Residents Dissemination and consultation public meeting
28th January 2015 Changa Chini, Mtangawanda, Pate Island	Mtangawanda residents Dissemination and consultation public meeting
28th January 2015 Pate social hall, Pate Island	Pate residents Dissemination and consultation public meeting
2nd February – 3rd February 2015, Sarova Panafric hotel, Nairobi	Lamu County Government workshop



Date and Place	Stakeholder group and meeting purpose
10th February 2015, Serena Hotel , Nairobi	Media editors Kick-off briefing
11th February 2015, Standard Media Group Offices Nairobi	Standard media group editors Kick-off briefing
12th February – 13th February 2015, Tamani Jua Resort, Malindi	Lamu members of County Assembly workshop
24th February 2015 Crowne Plaza Hotel, Nairobi	Media houses press briefing
1st April 2015 Mwana Arafa Restaurant Gardens, Lamu Island	Lamu County Administration kick-off workshop
22 <sup>nd</sup> June 2015 Lamu Island	Key Informant Interview Ministry of Gender, youth and social services Lamu County Government
23 <sup>rd</sup> June 2015 Ardhi House, Mokowe	Key Informant Interview Ministry of Education Lamu County Government
23 <sup>rd</sup> June 2015 Public health Office, Lamu Island	Key Informant Interview Ministry of Health and Environment Lamu County Government
24 <sup>th</sup> June 2015 Ministry of Agriculture Office, Lamu Island	Key Informant Interview Ministry of Agriculture Lamu County Government
23 <sup>rd</sup> June 2015 Chief's camp, Hindi	Focus Group Discussion with vulnerable stakeholder groups – Members of the Pastoralist communities
24 <sup>th</sup> June 2015 Chief's camp, Hindi	Focus Group Discussion with vulnerable stakeholder groups – Women from communities proximate to the project site
24 <sup>th</sup> June 2015 Chief's camp, Hindi	Focus Group Discussion with vulnerable stakeholder groups – Elders from indigenous minority communities

Date and Place	Stakeholder group and meeting purpose
25 <sup>th</sup> June 2015 Chiefs camp, Pate Island	Focus Group Discussion with vulnerable stakeholder groups – Farmers

### 3.3.1 Key views and issues raised

The stakeholders shared their views, concerns and requests on the proposed project. These have provided insight to the development of the SEP and will be addressed accordingly in the ESIA phase as well as during the project lifecycle.

Table 3-2 is a summary of the key issues and concerns raised during the stakeholder consultation process.

**Table 3-2: Key stakeholder views, concerns and requests**

Key views, concerns and requests highlighted	
<b>Access to portable water</b>	<ul style="list-style-type: none"> <li>Widespread lack of access to clean water for household consumption. Communities having to: walk long distances to access water, Purchase water at expensive rates, forego daily routines on account of lack of water</li> <li>Substandard water quality leading to disease</li> <li>Stakeholders, especially the women, emphatically expressed their request for APCL to prioritize access to portable water in their CSR initiatives</li> </ul>
<b>Education</b>	<ul style="list-style-type: none"> <li>Inadequate number and distribution of schools</li> <li>Lack of adequate infrastructure in the existing schools</li> <li>Poor academic performance</li> <li>Low education levels and high rates of school drop-outs</li> <li>General concern expressed over the local youth's low education levels and lack of marketable skills. This was cited as a hindrance to accessing the project's employment opportunities</li> <li>Need to establish and capacity build tertiary level institutions</li> <li>The stakeholders, especially those consulted from vulnerable groups sited poverty as the key challenge to access to education and requested APCL to provide bursary and sponsorship support</li> </ul>
<b>Health</b>	<ul style="list-style-type: none"> <li>Inadequate number and distribution of hospitals</li> <li>Lack of adequate infrastructure in the existing hospitals</li> <li>Need to provide ambulances to ease hospital transfers and referrals, with emphasis on maternity services</li> </ul>

Key views, concerns and requests highlighted	
	<ul style="list-style-type: none"> <li>• Need to rehabilitate and upgrade Mokowe hospital</li> <li>• Women expressed the need for satellite clinics in areas that are far from the available facilities to provide maternal health services</li> </ul>
<b>Livelihoods</b>	<ul style="list-style-type: none"> <li>• Concern was raised over the potential loss of livelihoods as a result of project activities with emphasis on the fishing and agriculture industries</li> <li>• Need for financial literacy capacity building for those to receive land compensation pay offs</li> <li>• It was emphatically expressed that APCL should ensure that those affected are not only compensated for their land and assets, but also for lost livelihoods and disruption of their day to day lives</li> </ul>
<b>Available employment, business and CSR opportunities for the local community</b>	<ul style="list-style-type: none"> <li>• There was a general expression of the need to clearly highlight the available employment and business opportunities that the project will present,</li> <li>• Need to ensure that information about available economic opportunities is delivered early enough for the community to prepare. Mediums for this information should be easily accessible to the community such as the use of local radio, local leaders and local notice boards</li> <li>• A need to clearly outline the percentage of employment and business opportunities that will be dedicated to the local community</li> <li>• A need to prioritize the local community in capacity building, employment and business opportunities</li> <li>• An expressed need to outline how APCL will empower the local community to participate in and benefit from the available opportunities</li> <li>• The community expressed a need to ensure equitable access to all available opportunities including consideration for the extremely poor and vulnerable groups</li> <li>• Stakeholders, especially women and indigenous minority communities, requested APCL to offer business training, loans and input support to enable them participate in the available business opportunities, citing that they are the poorest in the community and lack the skills and financial capacity to compete with other members of the community for the available opportunities</li> </ul>
<b>Resettlement and compensation</b>	<ul style="list-style-type: none"> <li>• General concern over the lack of title deeds by land owners</li> <li>• A need to understand the exact site and boundaries of the project site</li> <li>• Need to understand how the resettlement and compensation exercise will be implemented: who will compensate, the</li> </ul>

Key views, concerns and requests highlighted	
	<p>proponent or the government; what will be the price paid for an acre of land; will those displaced be allocated alternative land in another location; when will the compensation be implemented; how will the PAPs be identified</p> <ul style="list-style-type: none"> <li>• General concern over fraudulent land grabbing activities by influential individuals</li> <li>• An expressed concern that alternative land provided as during resettlement may not possess the same beneficial qualities as those within the project site. Such include land productivity, high land rates, proximity to water sources, marine travel and social ties</li> </ul>
<b>Poor road network</b>	<ul style="list-style-type: none"> <li>• Concern over the poor road network</li> <li>• Expressed need to develop the road networks in light of project-induced traffic increase</li> </ul>
<b>CSR program and benefit sharing mechanism</b>	<ul style="list-style-type: none"> <li>• Expressed need for APCL to clearly outline: how APCL will undertake community development; how APCL will share revenue with the county government; how APCL will ensure benefit sharing with the local communities</li> <li>• Stakeholders highlighted the following areas that the APCL CSR programme should focus on: Health; education; access to portable water supply and; improvement of roads</li> </ul>
<b>Project related politics</b>	<ul style="list-style-type: none"> <li>• The community articulated fear of politicization of the project with emphasis on; the resettlement and compensation; equitable access to opportunities by the local community</li> </ul>
<b>Project related impacts</b>	<ul style="list-style-type: none"> <li>• General concern over the potential negative health impacts</li> <li>• Expressed need to be assured that the project will not be implemented should potential impacts be adverse and without sufficient mitigation measures</li> <li>• Expressed need to be assured that the ESIA process will be transparent</li> <li>• An expressed need by the community to be actively engaged in the ESIA process</li> </ul>
<b>Lack of commitment</b>	<ul style="list-style-type: none"> <li>• The locals were concerned that APCL will not honor their commitment to enhance and promote the community's to benefit from the project</li> </ul>
<b>Unequal Opportunities</b>	<ul style="list-style-type: none"> <li>• Some locals claimed that the project will tend to favor a selective few politically and economically affluent individuals, as this has been the case with past development projects of a similar nature</li> </ul>
<b>Vulnerable Groups</b>	<ul style="list-style-type: none"> <li>• Vulnerable groups in the society such as women, the uneducated, and the disabled should not be discriminated against during employment. Opportunities should be created</li> </ul>

**Key views, concerns and requests highlighted**

	for them in which they can take advantage of to better their livelihoods.
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**3.3.2 Stakeholder logs and issues and response reports**

All stakeholder engagement activities are documented under a stakeholder engagement log which includes engagement particulars and attendance registration forms. All meetings are recorded through minutes and an issues and response report generated.

The stakeholder logs and issues and response reports for the stakeholder engagement meetings are appended to this report as Appendix 3 and 4 respectively.

**3.4 Community Development Activities**

Following feedback, concerns, and requests by the communities and stakeholders engaged, APCL has initiated various community development initiatives within the local communities in Lamu County. These have been implemented in partnership with the Lamu County government, civil society and local community members. APCL has engaged a Project Development Executive to spearhead the community development. These activities are outlined in Table 3-3.

**Table 3-3: Summary of community development activities**

<b>Development initiatives</b>	<b>Activities undertaken</b>
<b>Support to local fishermen</b>	APCL provided fishing supplies and equipment to more than 50 local fishermen. This was in an effort to increase the local fishermen’s efficiency, catch volumes, and enable them to fish in the deep seas.
<b>Cold Room Installation</b>	APCL purchased a cold room freezer with a holding capacity of 10 tons that will be located in Lamu island. The freezer is vital to fishermen who have no facilities to store their catch. The freezing unit affords the local fishermen ample time to negotiate for better prices, eliminating the practice of selling fish at throw-away prices in fear of loss due to fish going bad.
<b>Ice-Making Unit</b>	APCL has also sponsored the acquisition of an ice flake making machine that will assist the thousands of fishermen who go fishing without ice, forcing them to sell their fish as soon as possible to avoid loss due to fish rotting. The machine can produce up to 10 tons of flake ice per day.
<b>Supply of clean water</b>	APCL has sponsored construction of water reservoirs within the local communities and supports free weekly deliveries of fresh water to the communities. The community members no longer have to walk for long distances in search of clean water. APCL is also in the process of installing up to twenty tanks in

Development initiatives	Activities undertaken
	different remote areas including, Kwasasi, Pate, Witu, Mpeketoni, and Bargoni.
<b>Street paving</b>	APCL, together with the County Government of Lamu, sponsored the paving of the main street in Lamu island along the sea front as well as feeder. The paving has made mobility more efficient.
<b>Food donation</b>	APCL sponsored over 300 needy families with food supply during the fasting month of Ramadan.
<b>Street lighting</b>	APCL collaborated with the County Government to install solar powered street lights in Lamu town improving security and enabling businesses to operate for longer hours
<b>Afforestation Program</b>	APCL has launched an afforestation program with a goal of planting more than 300,000 trees in collaboration with the Kenya Forestry Research Institute. APCL is giving the local community members priority in allocating employment opportunities within this program and is working with local youth in to establish and manage tree nurseries
<b>Educational support – provision of scholarships</b>	APCL has partnered with the Ambassador Francis K Muthaura Foundation, a non-profit organization, to provide educational scholarships to the local community
<b>Educational support – infrastructural development</b>	APCL has embarked on several strategies to enhance education standards for the local communities. These include: construction of classrooms in schools within Bobo and Bargoni areas, providing library supplies and introducing technology through computer classes
<b>Educational support – Provision of solar powered study lights</b>	APCL has also donated solar powered study lamps to local schools and students, benefitting more than 500 students. The goal of this initiative is to assist students achieve better grades by giving them the opportunity to do their homework and study after school hours, as many homes in the local community do not have access to electricity.
<b>Support preservation of cultural heritage</b>	APCL has sponsored local cultural events such as the maw lid Festival and the Lamu Cultural Festival. These events celebrate the local Swahili heritage
<b>Supporting local farmers</b>	APCL supported local farmers at Kwasasi during the planting season rituals festivals. These festivals educate locals on new and efficient farming techniques.

## 4 Project stakeholders

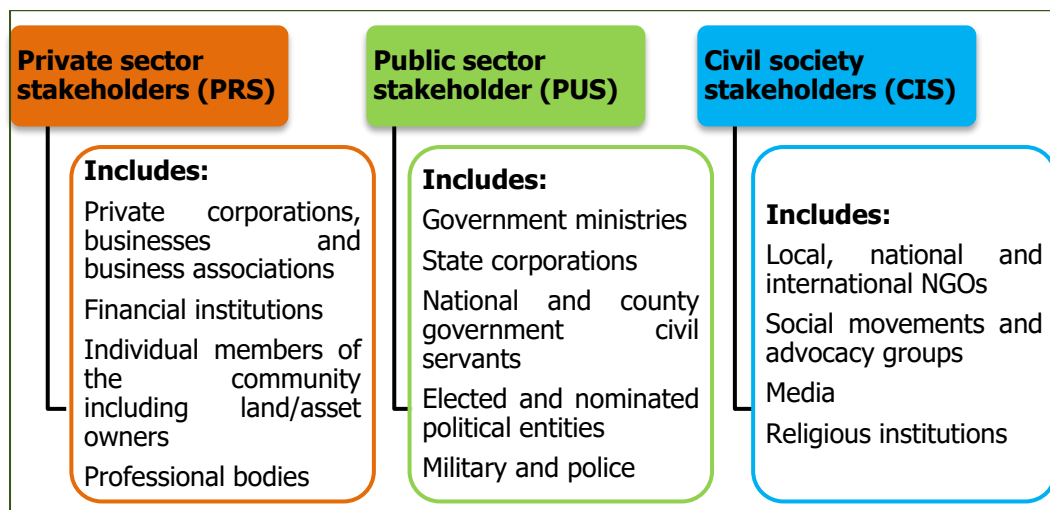
APCL implemented a conclusive stakeholder identification and analysis process. This has formed the foundation for planning and designing of subsequent stakeholder engagement activities. The stakeholder database and analysis will be reviewed and refined regularly as project particulars become more detailed and definite.

The stakeholder database was generated based on the identification of individuals, communities, groups and institutions who:

- Are most likely to experience, at significant levels, any potential negative and/or positive impacts of the proposed project
- Have the mandate over the various elements of the project’s activities (Such as Government ministries and leadership)
- Are considered vulnerable members of the community within the proposed project area

Stakeholder groups were identified at local, county and national levels. They have been grouped into the following categories: private sector (PRS); public sector (PUS); civil society (CIS). Figure 4-1 below illustrates the different stakeholder groups.

**Figure 4-1: Stakeholder categories**



The stakeholder analysis process sought to prioritize identified stakeholder based on: interest and expectations in relation to the proposed project; required levels of participation for each stakeholder throughout the project lifecycle; degree of influence of each stakeholder group to the direction and success of the proposed project; interrelationships between different stakeholders and the convergence/divergence between their interests and expectations. *'Interest'* measures the degree to which stakeholders are likely to be affected by the project and the degree of interest/concern they have in or about it. *'Power'* measures the influence stakeholders have over the project and degree to which they can affect project success/failure. Figure 4-2 shows the stakeholder power/interest matrix while Table 4-1 shows the various stakeholders that were mapped as part for the project.

Figure 4-2: Stakeholder power interest matrix

		1	2	3	4	5	6	7	8	9	10
10	Significant interest										
										PRS1 PUS15	
				CIS9	PRS5 PUS16		CIS18 PUS14	PUS1	PRS2 PUS38 PUS13	PRS11 PRS12	
7	some interest				PRS08 PRS9		PRS3 PRS4 PRS14	PUS33 CIS11	PUS35		
				PUS26 CIS12 CIS13	CIS10		CIS2 CIS3		PUS10 PUS18		
			PRS6 PRS10	CIS17	PUS12						
4	Little interest				PUS11 PUS25 PUS29 PUS30		PUS23 CIS6 CIS7	PUS3 PUS4 PUS5 PUS7 PUS21	PUS17 PUS22		
			PUS9 PUS6 CIS8	PRS13 CIS14 CIS4 PUS2 PUS27			PUS32	PUS20 PUS34	PUS19 PUS37		
		CIS15	PUS8 PUS28 PUS24 CIS16		CIS5		PUS36				
1	No interest										
		No Influence/Power		Little influence/Power			Some influence/Power		Significant Influence/Power		
		1	2	3	4	5	6	7	8	9	10

The labels represent the stakeholder ID as described in Table 4-1.



**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



**Table 4-1: Summary of project stakeholders and purpose of consultation**

Public sector stakeholders (PUS)		Civil society stakeholders (CIS)		Private sector stakeholders (PRS)	
ID	Stakeholder Name	ID	Stakeholder Name	ID	Stakeholder Name
PUS. 1	Ministry of Energy and Petroleum (MoEP)	CIS. 1	Nature Kenya	PRS. 1	Amu Power Company Ltd. (APCL)
PUS. 2	Ministry of Environment	CIS. 2	Media	PRS. 2	Lenders (Commercial Banks + AfDB)
PUS. 3	Ministry of Labor DOSHS	CIS. 3	Save Lamu	PRS. 3	Owner's Engineer (Sargent & Lundy Consulting)
PUS. 4	Ministry of Finance	CIS. 4	UNESCO	PRS. 4	Owner's HSE Consultant (KTL)
PUS. 5	Ministry of Lands	CIS. 5	WWF	PRS. 5	Land owners
PUS. 6	Ministry of Commerce and Tourism	CIS. 6	Hakijamii	PRS. 6	Non-land owners
PUS. 7	Ministry of Roads and Infrastructure	CIS. 7	Ujamma Centre	PRS. 7	Land owners - transmission line (Under KETRACO)
PUS. 8	Ministry of Agriculture	CIS. 8	Lamu Marine Conservation Trust (LAMCOT)	PRS. 8	Youth
PUS. 9	Ministry of Industrialization	CIS. 9	Lamu Environmental Preservation and Conservation Group (LEPAC)	PRS. 9	Women
PUS. 10	Ministry of Interior	CIS. 10	Lamu Chonjo (Magazine about Lamu)	PRS. 10	Vulnerable groups
PUS. 11	Ministry of Devolution and Planning	CIS. 11	Lamu Museum and World Heritage Site	PRS. 11	Contractors (SEDC + sub-contractors)
PUS. 12	Ministry of Sports, Culture, Youth	CIS. 12	Lamu Cultural Festival	PRS. 12	O&M Company
PUS. 13	County Government Executive (Governor and County executives)	CIS. 13	Lamu Tourist Association	PRS. 13	General public

## SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya

### Stakeholder Engagement Plan (SEP)

Public sector stakeholders (PUS)		Civil society stakeholders (CIS)		Private sector stakeholders (PRS)	
ID	Stakeholder Name	ID	Stakeholder Name	ID	Stakeholder Name
PUS. 38	County Government County Assembly (MCAs)	CIS. 14	Kenya Sea Turtle Conservation Committee (KESCOM)	PRS. 14	Africa Practice (AP)
PUS. 14	Politicians (MPs lamu West and Lamu East)	CIS. 15	Kenya Marine Forum		
PUS. 15	KP&LC	CIS. 16	Faith based organizations		
PUS. 16	KETRACO	CIS. 17	Arocha International		
PUS. 17	ERC	CIS. 18	NGOs in the area		
PUS. 18	NEMA				
PUS. 19	KCAA and Kenya Association of Air Operators (KAAO)				
PUS. 20	Communications Authority of Kenya				
PUS. 21	National Land Commission				
PUS. 22	Kenya National Highways Authority (KeNHA)				
PUS. 23	Kenya Rural Roads Authority (KeRRA)				
PUS. 24	Water Resource Management Authority (WRMA)				
PUS. 25	National Museums of Kenya (NMK)				
PUS. 26	LAPSSET				
PUS. 27	Coast Development Authority (CDA)				

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**

**Stakeholder Engagement Plan (SEP)**

Public sector stakeholders (PUS)		Civil society stakeholders (CIS)		Private sector stakeholders (PRS)	
ID	Stakeholder Name	ID	Stakeholder Name	ID	Stakeholder Name
PUS. 28	Kenya Marine and Fisheries Research Institute (KM&FRI)				
PUS. 29	Kenya Wildlife Service (KWS)				
PUS. 30	Kenya Forest Service (KFS)				
PUS. 31	Department of Resource Surveys and Remote Sensing (DRSRS)				
PUS. 32	Kenya Maritime Authority (KMA)				
PUS. 33	Kenya Pipeline Authority (KPA)				
PUS. 34	Ministry of Defense				
PUS. 35	Kenya Revenue Authority (KRA)				
PUS. 36	Kenya Police Regular and Administration				
PUS. 37	Lamu county Physical Planning				
CIS. 1	Nature Kenya				
CIS. 2	Media				
CIS. 3	Save Lamu				
CIS. 4	UNESCO				
CIS. 5	WWF (Boni Dodori Livelihood and Forests Project)				
CIS. 6	Hakijamii				

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



Public sector stakeholders (PUS)		Civil society stakeholders (CIS)		Private sector stakeholders (PRS)	
ID	Stakeholder Name	ID	Stakeholder Name	ID	Stakeholder Name
CIS. 7	Ujamma Centre				
CIS. 8	Lamu Marine Conservation Trust (LAMCOT)				
CIS. 9	Lamu Environmental Preservation and Conservation Group (LEPAC)				
CIS. 10	Lamu Chonjo (Magazine about Lamu)				
CIS. 11	Lamu Museum and World Heritage Site				
CIS. 12	Lamu Cultural Festival				
CIS. 13	Lamu Tourist Association				
CIS. 14	Kenya Sea Turtle Conservation Committee (KESCOM)				
CIS. 15	Kenya Marine Forum				
CIS. 16	Faith based organizations				
CIS. 17	Arocha International				
CIS. 18	NGOs in the area				

## **5 Stakeholder engagement program**

This stakeholder engagement programme purposes to ensure seamless, inclusive interactions between APCL and all those with the potential of being impacted by the project during the ESIA phase and subsequent construction and operation phases.

### **5.1 Purpose**

The overall objective of this programme is to define a stakeholder engagement, public information disclosure and consultation process that will be implemented throughout the project lifecycle by Amu Power Company Limited. It highlights the methods that will be used by the Proponent to communicate with stakeholder groups who may be affected by or interested in the project operations and activities. It also outlines the strategies that will be implemented to ensure inclusion of vulnerable stakeholder groups as well as the key objectives of SE during the different project phases. The end goal of this programme is to build a trusting relationship with the community and other interested stakeholders based on a transparent and timely supply of information and open dialogue.

### **5.2 Approach to Stakeholder Engagement**

The approach to stakeholder engagement is geared towards managing two way communications between the project proponent and the public with the goal of improving decision making and promoting understanding through the active engagement of individuals, groups and organizations who have a stake in the project and its outcomes.

Table 5-1 presents the stakeholder engagement approach to be implemented for the proposed project.

**Table 5-1: Stakeholder engagement approach**

Stakeholder engagement level	Stakeholder engagement objectives		Engagement approaches
1.	Inform	To provide stakeholders with timely, balanced and unbiased information about the proposed project to ensure they fully comprehend all aspects including potential impacts, alternatives and opportunities. This ensures there is clarity about APCL intentions and that stakeholders have advance notice of project plans. The information should be provided in suitable forms accessible by all targeted stakeholders	Print materials including reports, APCL website, public meetings, media and press releases, workshops
2.	Consult	To obtain stakeholder feedback on the proposed project and gather their input on the analysis of impacts, alternatives and/or decisions as well as the identification of stakeholder priorities. This gives stakeholders an opportunity to influence and improve plans for the proposed project	Focus Groups, Surveys, One to one meetings. Public meetings workshops, On line feedback
3.	Involve	To work directly with the stakeholders throughout the project lifecycle to ensure that their concerns and priorities are consistently understood and addressed and that stakeholders have an active input in the decision making processes.	Multi stakeholder forums; advisory panels; consensus building processes; Participatory decision making processes.
4.	Collaborate	To partner with stakeholders in decision making including the identification of issues and the development and implementation of alternatives and preferred solutions. This creates opportunities to build shared understanding and agreement or to get a better understanding of disagreements with an aim of reaching consensus.	Joint projects, voluntary two party or multi stakeholder initiatives; partnerships
5.	Empower	To place final decision making in the hands of the stakeholders by ensuring their access to information and enhancing opportunities to participate in decision making	Integration of Stakeholders into governance structures such as board members, committee members or shareholders

### **5.3 Documentation of Stakeholder engagement activities**

Stakeholder engagement activity records will outline the following key points:

1. Type of information disclosed, date, formats and mode of distribution
2. Locations of all project information/consultation meetings
3. Attendance records and identity for individuals, groups, and/or organizations consulted
4. Key issues/concerns raised/discussed and requests received;
5. APCL's response to issues raised, requests, including any commitments or follow up actions and reporting back to stakeholders
6. Registration of complaints via grievance register

Communication records will be maintained by the Administration Department of Amu Power Company Limited. Key information will be clearly communicated to stakeholders and also the key incoming communications (i.e. general questions, complaints, etc.) will be maintained including a summary of actions to be taken.

The main tools for recording stakeholder engagement activities include:

- **Grievance mechanism:** the Complaint and Grievance Procedure will provide a mechanism for communities and affected parties to raise complaints and grievances and allow APCL to respond to and resolve the issues in an appropriate manner. This procedure includes a register to record all grievances and resolution actions
- **Commitment register:** this register will be used to record any public commitments made by the APCL or public concerns raised about the Project that require action.
- **Engagement notes/stakeholder logs:** this will ensure that an accurate and detailed record of information and views are gathered at every stakeholder meeting. Prior to all consultations, responsibility shall be appointed to one member of the project team to take detailed notes using a prescribed format. These engagements notes should be formally confirmed by a representative of the engaged stakeholder group.

### **5.4 Mediums for Stakeholder Communication and Consultation**

A variety of different communication and consultation mediums have been proposed for the implementation of this SEP. These will be selectively applied to fit the needs and circumstances of the various stakeholder groups in order to promote effective stakeholder participation and engagement. APCL will ensure that all mediums utilized take into consideration the cultural context and are relevant in terms of language used, area of reach, complexity of information shared and timeframe for effective communication. The proposed mediums for stakeholder engagement are outlined in Table 7 -9 below.

**Table 5-2: Mediums for stakeholder meetings**

Stakeholder meetings mediums		Description
1.	Public meetings	These are gatherings open to all interested in or affected by the project rather than individuals or groups that are specifically invited
2.	Focus group discussions	These are structured meetings that pull together stakeholders with the same interests for information dissemination, identification of issues and ideas and to dialogue towards mutually agreeable decisions
3.	One on one consultations	These are meetings conducted directly with key stakeholder individuals/representatives
4.	Workshops	These are facilitated events designed to enable stakeholders to work actively and collaboratively on a common problem or task

**Table 5-3: Mediums for media based engagement**

Media based engagement mediums		Description
1.	Online Media	These will include the company website, blog, and social media platforms comprising of twitter, Facebook and LinkedIn
2.	Radio, Newspaper and Television	Radio, Newspaper and Television announcements and interviews will be utilized as formal announcements to: share information with the general public; prepare and invite stakeholders for engagement activities; advertise opportunities; respond to public concerns; report on project progress and; stimulate awareness about the project

**Table 5-4: Mediums for audio, visual and written engagement**

Audio, visual and written engagement mediums		Description
1.	Telephone correspondence	This will encompass the use of telephone, mobile phone and teleconference calls. APCL will also establish telephone hotlines as part of the Grievance mechanism. It is important to note that , official deliberations and agreements may still require creation of formal records
2.	Email correspondence	This medium will be utilized for fast correspondence with formal stakeholders who (I) Have access to supporting IT infrastructure and (II) Are comfortable with this form of engagement. Nonetheless, formal agreements



Audio, visual and written engagement mediums		Description
		and invitations will still require delivery of printed and certified communiqué
3.	Community notice boards	Notice boards will be placed at key public locations. These will be utilized to inform communities about: available opportunities for employment and business; upcoming events; company branding initiatives; CSR programmes and; brief reports about the project.
4.	Print materials	All print materials produced will be simple, concise, and will take into consideration the cultural context such as language (Swahili), and illiteracy levels. Print materials will include, but are not limited to: <ul style="list-style-type: none"> <li>▪ Letters</li> <li>▪ Background Information Document</li> <li>▪ Newsletters</li> <li>▪ Posters / notices</li> <li>▪ Pamphlets and brochures</li> <li>▪ Models and Maps</li> </ul>
5.	Reports	Reports will be utilized to communicate, in detail, about specific subjects. Reports will include but are not limited to: <ul style="list-style-type: none"> <li>▪ Grievance mechanism updates</li> <li>▪ Non-technical summaries and updates</li> <li>▪ Project progress</li> <li>▪ Social development (CSR) programmes</li> <li>▪ SEP activities reports</li> <li>▪ Planned activities going forward</li> </ul>
6.	Surveys and questionnaires	These are structured research tools that will be used to gather quantitative and qualitative information on stakeholder views, experiences and behaviors  (Note: These may also be implemented in a one on one or group meeting forum setup)
7.	Suggestion boxes	These will be located at central, well publicized locations, accessible to community members, and agreed upon by the community leadership. Suggestions boxes must be managed proactively and continuously, whereby feedback

Audio, visual and written engagement mediums	Description
	is given either in the applicable stakeholder meeting or via notice boards.

## 5.5 Engagement strategy for special stakeholder groups

Scoping studies have identified special stakeholder groups that will require special consideration and prioritization in their engagement with APCL due to their potential vulnerability. These include:

- People living with disabilities
- Women
- The youth
- The elderly

APCL is advised to conduct an extensive analysis of the prioritized stakeholder groups including their vulnerability index as well as their key concerns in relation to the project. Additionally, APCL may apply the following mechanisms to ensure participation and equal representation of the special stakeholder groups:

a) Informed Consultation and Participation (ICP)

ICP may be applied to capture, prioritize and address issues affecting special stakeholder groups

b) Employment equity and positive action

APCL to make deliberate efforts to ensure individuals from the identified vulnerable groups are accorded employment opportunities. This may be achieved through a quota system or set preferences during the selection process among other alternatives. APCL may also promote the uptake of such opportunities through support in skill building.

c) Committee representation

It is advised to ensure representation of the vulnerable stakeholder groups in the various public committees that will be instituted for the project from time to time. These will include the grievance appeals committee, monitoring and evaluation committees, RAP committees, and community development initiatives committees.

d) Sustainable development initiatives

APCL will collaborate with appropriate development agencies and representatives of identified vulnerable stakeholder groups in identifying, planning and implementing sustainable social and economic development initiatives. These may include health, business enterprise support, bursary and educational support.

In compliance with AfDB's ISS, APCL will endeavor towards stakeholder engagement that:

- Involves representative bodies and civil society organizations, as well as members from the vulnerable communities themselves;
- Ensures inclusivity in a socially and culturally appropriate manner;
- Provides sufficient time for the vulnerable groups' decision making processes;

- Facilitates the vulnerable groups' expression of their views, concerns and proposals in the language and manner of their choice, without external manipulation, interference, coercion, or intimidation; and
- Respects the culture, knowledge and practices of vulnerable communities

## **5.6 Stakeholder Information and Communication Plan**

The proponent will promote, establish and take advantage of efficient methods of communication in order to reach stakeholders and establish open dialogue to help overcome critical issues concerning the complete realization of the Project. The proposed stakeholder communication plan for those mapped, is shown in Table 5-5.

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**Table 5-5: Summary of Stakeholder Information and Communication Plan**

ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PRS 1.	Amu Power Company Limited (APCL)	<ul style="list-style-type: none"> <li>Envisions strategic fit with overall objectives of the SPV</li> <li>Imposes production targets</li> <li>Asset management (perform quality checks)</li> <li>Compliance with Kenyan ESHS laws and AfDB's ISS</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>
PRS 2.	Lenders (AfDB)	<ul style="list-style-type: none"> <li>Envisions strategic fit with Lenders/DFI requirements</li> <li>Ensures that project fits in with Bank policies (e.g. AfDB E&amp;S requirements)</li> <li>Provides project financing (Chinese Bank)</li> <li>Provides Partial Risk Guarantee (AfDB)</li> </ul>	<ul style="list-style-type: none"> <li>Environmental and building decisions / permits</li> <li>Project progress reports</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Phone</li> <li>Official letters</li> <li>One on one meetings</li> <li>Power point presentation</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>At project milestones,</li> <li>as negotiated with APCL</li> </ul>
PRS 3.	Owner's Engineer (S&L)	<ul style="list-style-type: none"> <li>Provide technical inputs on all aspects of the project</li> <li>Provide contract assessment of all contracts</li> <li>Operational phase facility management</li> </ul>	<ul style="list-style-type: none"> <li>Environmental and building decisions / permits</li> <li>Project progress reports</li> </ul>	"	<ul style="list-style-type: none"> <li>At project milestones,</li> <li>ad hoc proportionate to issues arising</li> <li>as agreed with APCL</li> </ul>
PRS 4.	Owner's HSE Consultant (KTL)	<ul style="list-style-type: none"> <li>Provide ESMS inputs on all aspects of the project</li> <li>Provide resources to implement the SEP and GM</li> <li>Develop ESAP related documentation</li> </ul>	<ul style="list-style-type: none"> <li>Environmental and building decisions / permits</li> <li>Project progress reports</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
		<ul style="list-style-type: none"> <li>Provide a full time HSE Officer for the construction phase</li> </ul>			
PRS 5.	Land owners	<ul style="list-style-type: none"> <li>Expected one off payment</li> <li>Cultural heritage assurance</li> <li>Employment creation</li> <li>Economic improvement of the area</li> <li>Beneficiaries of CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details and progress of CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	<ul style="list-style-type: none"> <li>Official letters</li> <li>Forums</li> <li>FGDs</li> <li>BID</li> <li>Barazaas</li> <li>Media announcements</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>
PRS 6.	Non land owners	<ul style="list-style-type: none"> <li>Cultural heritage is assurance</li> <li>Employment creation</li> <li>Economic improvement of the area</li> <li>Expected participation in the CSR program</li> <li>Integrity of livestock is ensured</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details and progress of CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	<ul style="list-style-type: none"> <li>Official letters</li> <li>Forums</li> <li>FGDs</li> <li>BID</li> <li>Formal public meetings</li> <li>Media announcements</li> </ul>	<p style="text-align: center;">"</p>
PRS 7.	Land owners – transmission line	<ul style="list-style-type: none"> <li>Cultural heritage is assured</li> <li>Employment creation</li> <li>Economic improvement of the area</li> <li>Participate in CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details and progress of CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	<ul style="list-style-type: none"> <li>Official letters</li> <li>Forums</li> <li>FGDs</li> <li>BID</li> <li>Formal public meetings</li> <li>Media announcements</li> </ul>	<p style="text-align: center;">"</p>

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PRS 8.	Youth	<ul style="list-style-type: none"> <li>Expected reimbursement for land</li> <li>Cultural heritage assurance</li> <li>Employment creation</li> <li>Economic improvement of the area</li> <li>Beneficiaries of CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	<ul style="list-style-type: none"> <li>Forums</li> <li>FGDs</li> <li>BID</li> <li>Formal public meetings</li> <li>Media announcements</li> <li>Website</li> <li>Surveys and questionnaires</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>
PRS 9.	Women	<ul style="list-style-type: none"> <li>Better access to healthcare, educational facilities,</li> <li>Better access to potable water resources</li> <li>Not having to travel long distances to fetch water</li> <li>Creation of employment</li> <li>Creation of a market for foodstuff, ornaments,</li> <li>Receive benefits from CSR program for socio economic development of the family unit</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	"	"
PRS 10.	Vulnerable groups	<ul style="list-style-type: none"> <li>Bursaries and scholarships</li> <li>Better healthcare for physically challenged persons</li> <li>Improvement of social welfare</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PRS 11. Contractors – SEDC (EPCM + sub-contractors)	<ul style="list-style-type: none"> <li>Successful completion (OTIF) of the project</li> <li>Cooperation with APCL, Govt. agencies and all other stakeholders</li> <li>First priority for employment to be given to local communities</li> <li>Compliance with APCL policies/AfDB E&amp;S requirements</li> <li>Meet Employer's requirements throughout construction phase</li> </ul>	<ul style="list-style-type: none"> <li>Grievance mechanisms updates</li> <li>Environmental and building decisions / permits</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Phone</li> <li>One on one meetings</li> <li>Power point presentation</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>As agreed with APCL</li> </ul>	
PRS 12. O&M Company	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Environmental and building decisions / permits</li> </ul>	<p>“</p>	<ul style="list-style-type: none"> <li>As agreed with APCL</li> </ul>	
PRS 13. General public	<ul style="list-style-type: none"> <li>Cultural heritage assurance</li> <li>Employment creation</li> <li>Economic improvement of the area</li> <li>Participation in CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details and progress of CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> </ul>	<ul style="list-style-type: none"> <li>FGDs</li> <li>Forums</li> <li>Barazaas</li> <li>Media announcements</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>	
PRS 14. Africa Practice (AP)	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Phone</li> <li>One on one meetings</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
				<ul style="list-style-type: none"> <li>Power point presentation</li> </ul>	
PUS 1.	Ministry of Energy and Petroleum	<ul style="list-style-type: none"> <li>Give approval to engage with KP&amp;LC for PPA</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with energy sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>As required in compliance with ministry regulations</li> <li>Ad hoc as unprecedented needs arise</li> </ul>
PUS 2.	Ministry of Environment	<ul style="list-style-type: none"> <li>Set Policy on environmental affecting the country</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with environmental regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 3.	Ministry of Labor DOSHS	<ul style="list-style-type: none"> <li>Issues Workplace Registration certificate to the O&amp;M company</li> <li>Registers the site as a "construction site".</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"



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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PUS 4.	Ministry of Finance	<ul style="list-style-type: none"> <li>Treasury provides Government Letter of Support</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 5.	Ministry of Lands	<ul style="list-style-type: none"> <li>Project site survey and land purchase and lease agreements</li> <li>RAP</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Land related grievance issues updates</li> </ul>	"	"
PUS 6.	Ministry of Commerce and Tourism	<ul style="list-style-type: none"> <li>Impacts (Negative and positive) to the tourism sector</li> <li>Commercial growth of Lamu</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Cultural heritage conservation efforts</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"
PUS 7.	Ministry of Roads and Infrastructure	<ul style="list-style-type: none"> <li>Construction of new roads</li> <li>improvement of existing roads</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Road works plans</li> </ul>	"	"
PUS 8.	Ministry of Agriculture	<ul style="list-style-type: none"> <li>Potential loss of agricultural production and livelihoods</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Resentment and compensation plans</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PUS 9.	Ministry of Industrialization	<ul style="list-style-type: none"> <li>Creation of SEZ near the project site</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with sector regulations</li> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 10.	Ministry of Interior	<ul style="list-style-type: none"> <li>Internal security and coordination of National Government</li> <li>Issuance of work permits</li> <li>Gazettement of facility as a security installation</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 11.	Ministry of Devolution and Planning	<ul style="list-style-type: none"> <li>Provision of training services through NYS for Lamu residents on coal power plant construction</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"
PUS 12.	Ministry of Sports, Culture, Youth	<ul style="list-style-type: none"> <li>Preservation of cultural heritage</li> <li>youth and sport related CSR initiatives</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and mitigation measures</li> <li>Details, progress and opportunities for partnership in the CSR programme for youth initiatives</li> </ul>	"	"
PUS 13.	County Government Executives	<ul style="list-style-type: none"> <li>Economic improvement of the area</li> <li>Partnership/interest in the CSR Program</li> </ul>	<ul style="list-style-type: none"> <li>Proponent revenue and taxation</li> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>		
PUS 14. Politicians (MPs Lamu East, Lamu West)	<ul style="list-style-type: none"> <li>Economic improvement of the area</li> <li>Participate in/interest in the CSR Program</li> </ul>	<ul style="list-style-type: none"> <li>Proponent revenue and taxation</li> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"	
PUS 15. KP&LC	<ul style="list-style-type: none"> <li>Approves the PPA with APCL</li> <li>Purchases power from APL</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Project design details</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>As required in compliance with applicable</li> </ul>	

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**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Compliance with energy sector regulations</li> <li>Expected input into project activities</li> </ul>		<ul style="list-style-type: none"> <li>industry regulations</li> <li>Ad hoc as unprecedented needs arise</li> </ul>
PUS 16. KETRACO		<ul style="list-style-type: none"> <li>Connecting to the "proposed" sub station</li> <li>Approve the TL corridor</li> <li>Approves technical documentation for connection to the grid</li> <li>Take over the TL</li> <li>Approvals for transmission line, specs for transformers and other electrical components</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Project design details</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Compliance with energy sector regulations</li> <li>Expected input into project activities</li> </ul>	"	"
PUS 17. Energy Regulatory Commission		<ul style="list-style-type: none"> <li>Issues approval for the PPA</li> <li>Issue Generation License</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with energy sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 18. NEMA		<ul style="list-style-type: none"> <li>Issues environmental related permits (EIA License) and monitors compliance of operations</li> <li>Inspects and monitors impact of the project on the environment</li> <li>Grants or withdraws permits (such as EIA License, Effluent Discharge License)</li> <li>Imposes measures (Improvement Orders) to fulfill legal obligations</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent environmental and building decisions / permits</li> <li>Compliance with environmental regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>As required in compliance with applicable industry regulations</li> </ul>

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
					<ul style="list-style-type: none"> <li>Ad hoc as unprecedented needs arise</li> </ul>
PUS 19.	KCAA and Kenya Association of Air Operators (KAOA)	<ul style="list-style-type: none"> <li>Permit for obstacle lighting,</li> <li>Erection of stacks</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 20.	Communications Authority of Kenya (CAK)	<ul style="list-style-type: none"> <li>Letter of "No Objection" for installation of stacks</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 21.	National Land Commission	<ul style="list-style-type: none"> <li>Approves the "extension of use" for the various parcels of land for the project</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Land related grievance issues updates</li> </ul>	"	"
PUS 22.	Kenya National Highways Authority (KeNHA)	<ul style="list-style-type: none"> <li>Issue approvals and permits for transportation of abnormal load components from Mombasa to the project site</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"

## SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya

### Stakeholder Engagement Plan (SEP)

ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PUS 23.	Kenya Rural Roads Authority (KeRRA)	<ul style="list-style-type: none"> <li>Issues approval for upgrading the classified roads needed from Mokowe to the project site and any other roads requiring upgrades</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Road works plans</li> </ul>	"	"
PUS 24.	Water Resource Management Authority (WRMA)	<ul style="list-style-type: none"> <li>Issues water abstraction permit for boreholes that the project may require</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 25.	National Museums of Kenya (NMK)	<ul style="list-style-type: none"> <li>Issues "Letter of No Objection"</li> <li>Needs to be involved in Chance finds procedure</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Cultural heritage conservation efforts</li> </ul>	"	"
PUS 26.	LAPSSET	<ul style="list-style-type: none"> <li>APCL project validates LAPSSET project</li> <li>APCL will be a regular user of the port for bringing in coal loaded barges</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Power plant design and operations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"
PUS 27.	Coast Development Authority (CDA)	<ul style="list-style-type: none"> <li>Concerned with socio economic development plans along the Kenyan coast</li> <li>Concerned with the use/abstraction of natural resources especially sea waters</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Proponent's socio economic development plans</li> </ul>	"	"

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### Stakeholder Engagement Plan (SEP)

ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PUS 28.	Kenya Marine and Fisheries Research Institute (KM&FRI)	<ul style="list-style-type: none"> <li>Concerned with project impacts on the aquatic environment</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Marine biodiversity conservation efforts</li> </ul>	"	"
PUS 29.	Kenya Wildlife Service (KWS)	<ul style="list-style-type: none"> <li>Concerned with project impacts on the biological environment</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Wildlife conservation efforts</li> </ul>	"	"
PUS 30.	Kenya Forest Service (KFS)	<ul style="list-style-type: none"> <li>In charge of mangroves in the country</li> <li>Tree pruning permit</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Forest conservation efforts</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"
PUS 31.	Department of Resource Surveys and Remote Sensing (DRSRS)	<ul style="list-style-type: none"> <li>Concerned with the status, impact on and use of natural resources</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"
PUS 32.	Kenya Maritime Authority (KMA)	<ul style="list-style-type: none"> <li>Licensing and inspection of barges</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> </ul>	"	"

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**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Project progress and performance reports (Information on key milestones)</li> </ul>		
PUS 33. Kenya Pipeline Authority (KPA)	<ul style="list-style-type: none"> <li>Acquisition of project site land</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"	
PUS 34. Ministry of Defense (Kenya Navy)	<ul style="list-style-type: none"> <li>Kenya Navy approval required</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	<ul style="list-style-type: none"> <li>Ad hoc communication proportionate to unprecedented concerns raised</li> </ul>	
PUS 35. Kenya Revenue Authority (KRA)	<ul style="list-style-type: none"> <li>Day to day clearance of imported goods</li> <li>Customs exemptions</li> <li>Valuation of imported goods</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> </ul>	"	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>Ad hoc communication proportionate to unprecedented concerns raised,</li> </ul>	
PUS 36. Kenya Police Regular and Administration	<ul style="list-style-type: none"> <li>Provision of security services during the baseline, pre-construction, construction and operational phases of the project</li> <li>provision of traffic management services for abnormal load movement along the Mombasa Lamu road</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	"	"	



**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
PUS 37. Lamu county Physical Planning		<ul style="list-style-type: none"> <li>Approve building and construction plans for the project</li> <li>Issue building permit for on-site sub station</li> <li>Conduct periodic inspections of project</li> <li>Get approval of the "as built" project at the end of the construction phase</li> <li>Receives annual rates for lease of project footprint</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Cultural heritage conservation efforts</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	<ul style="list-style-type: none"> <li>Annual updates on project progress</li> <li>Ad hoc communication proportionate to unprecedented concerns raised</li> </ul>
PUS 38. County Government – County Assembly (MCAs)		<ul style="list-style-type: none"> <li>Economic improvement of the area</li> <li>Partnership/interest in the CSR Program</li> <li>Adherence to applicable county regulations</li> </ul>	<ul style="list-style-type: none"> <li>Proponent revenue and taxation</li> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Available opportunities for business and employment</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	"	"
CIS 1. Nature Kenya		<ul style="list-style-type: none"> <li>Concerned with Important Bird Areas (IBAs)</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> </ul>	"	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>Ad hoc communication proportionate to</li> </ul>

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Grievance mechanisms updates</li> <li>Biodiversity conservation efforts</li> </ul>		unprecedented concerns raised
CIS 2.	Media	<ul style="list-style-type: none"> <li>Report progress on the project</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> </ul>	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress</li> <li>Ad hoc communication proportionate to unprecedented concerns raised</li> </ul>
CIS 3.	Save Lamu	<ul style="list-style-type: none"> <li>Coalition of local NGOs and CBOs</li> <li>Development of Lamu BCP</li> <li>Interest in the CSR program</li> <li>Concerned with preservation of cultural heritage and environmental conservation</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	"	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>
CIS 4.	UNESCO	<ul style="list-style-type: none"> <li>Preservation of Lamu cultural heritage</li> <li>Supports local efforts in conservation</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with environmental and cultural heritage regulations</li> <li>Cultural heritage conservation efforts</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> </ul>	"

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**

**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Details, progress and opportunities for partnership in the CSR programme</li> </ul>	<ul style="list-style-type: none"> <li>Workshops</li> <li>Website</li> </ul>	
CIS 5.	WWF (Bony Door Livelihood and Forests Project)	<ul style="list-style-type: none"> <li>Economic improvement of the forest communities</li> <li>Concerned with conservation of the forest landscape covered by Bony and Door national reserves and the Lunch and Bony Forest Reserves</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Forest conservation efforts</li> </ul>	"	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>
CIS 6.	Hakijamii	<ul style="list-style-type: none"> <li>Interest in the CSR program</li> <li>Improved social welfare</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	"	"
CIS 7.	Ujamma Trust	<ul style="list-style-type: none"> <li>Economic development of the area</li> <li>Interest in the CSR program</li> <li>Improved social welfare</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> </ul>	"

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	
CIS 8.	Lamu Marine Conservation Trust (LAMCOT)	<ul style="list-style-type: none"> <li>Focus on conservation of turtles</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Marine conservation efforts</li> </ul>	"	"
CIS 9.	Lamu Environmental Preservation and Conservation Group (LEPAC)	<ul style="list-style-type: none"> <li>Main focus socio-environmental impacts of development of Lamu Port</li> <li>Partnership/interest in the CSR program</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Marine conservation efforts</li> </ul>	"	"
CIS 10.	Lamu Chonjo	<ul style="list-style-type: none"> <li>To report progress on the project</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> </ul>	"

**SEP for 1,050MW Coal Fired Power Plant, Lamu County, Kenya**  
**Stakeholder Engagement Plan (SEP)**



ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Project progress and performance reports (Information on key milestones)</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	
CIS 11. Lamu Museum and World Heritage Site		<ul style="list-style-type: none"> <li>Needs to be involved in cultural and heritage studies and chance finds procedure</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Cultural heritage conservation efforts</li> </ul>	"	"
CIS 12. Lamu Cultural Festival		<ul style="list-style-type: none"> <li>Impacts (Negative and positive) to the tourism sector</li> <li>Cultural heritage and tourism support CSR initiatives</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Cultural heritage conservation efforts</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> </ul>	"	"
CIS 13. Lamu Tourist Association		<ul style="list-style-type: none"> <li>Impacts (Negative and positive) to the tourism sector</li> <li>Cultural heritage and tourism support CSR initiatives</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Cultural heritage conservation efforts</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> </ul>	"	"
CIS 14. Kenya Sea Turtle Conservation Committee (KESCOM)		<ul style="list-style-type: none"> <li>Focus on conservation of turtles</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and licensing</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for partnership in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Marine conservation efforts</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
CIS 15.	Kenya Marine Forum	<ul style="list-style-type: none"> <li>Environmental conservation efforts by APCL</li> </ul>	<ul style="list-style-type: none"> <li>ESIA report and subsequent permits and licences</li> <li>Compliance with sector regulations</li> <li>Project progress and performance reports (Information on key milestones)</li> </ul>	<ul style="list-style-type: none"> <li>Emails</li> <li>Official letters</li> <li>Phone</li> <li>One on one meetings</li> <li>BID</li> <li>Workshops</li> <li>Website</li> <li>reports</li> </ul>	"
CIS 16.	Faith based organizations	<ul style="list-style-type: none"> <li>Participation in the CSR program</li> <li>Moral and cultural integrity of the community</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	"	"
CIS 17.	A ROCHA International	<ul style="list-style-type: none"> <li>Interest in the CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> </ul>	"	"

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ID	Stakeholder	Area of interest	Information needs	Medium of communication	Frequency
			<ul style="list-style-type: none"> <li>Tracked impact of the project on the socioeconomic conditions</li> </ul>		
CIS 18. NGOs in the area	<ul style="list-style-type: none"> <li>Represent social groups</li> <li>Partnership/interest in the CSR program</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	<ul style="list-style-type: none"> <li>Resettlement and compensation plans</li> <li>Cultural heritage conservation efforts</li> <li>ESIA report and mitigation measures</li> <li>Environmental and building decisions / permits</li> <li>Project progress and performance reports (Information on key milestones)</li> <li>Details, progress and opportunities for participation in the CSR programme</li> <li>Grievance mechanisms updates</li> <li>Tracked impact of the project on the socioeconomic conditions of the County</li> </ul>	“	<ul style="list-style-type: none"> <li>Quarterly and annual updates on project progress/milestones and GM</li> <li>Ad hoc communication proportionate to concerns raised, and available opportunities</li> </ul>

## **5.7 Stakeholder Engagement throughout the project lifecycle**

Stakeholder engagement is crucial during all the phases of the project. During the planning phase which includes the ESIA and pre FEED, post ESIA and FEED, and preconstruction phases, stakeholder engagement will focus on identifying key stakeholders, the potential positive and negative impacts of the proposed development and community needs and priorities. During the construction and implementation phases, ongoing dialogue and stakeholder participation is required to inform key decision making. In the monitoring and evaluation phase, the impact of projects should be assessed together with stakeholders and communicated along with lessons learned. The sections below detail the specific SE focus for the various project phases.

### **5.7.1 Scoping Phase**

During the Scoping Phase, stakeholder engagement will seek to meet the following objectives:

- Receive initial information about the proposed project;
- Contribute to the design of the stakeholder engagement process;
- Raise issues of concern and suggestions for enhanced benefits;
- Verify that their issues have been recorded;
- Assist in identifying reasonable alternatives; and
- Contribute relevant local information and traditional knowledge to the environmental assessment

### **5.7.2 ESIA phase**

During the Impact Assessment Phase, stakeholder engagement will seek to meet the following objectives:

- Contribute relevant information and local and traditional knowledge to the environmental assessment
- Verify that their issues have been considered in the environmental investigations
- Receive information on the outcome of the authority decision, and how and by when the decision can be appealed
- Comment on the findings of the environmental assessments
- Report final outcomes to stakeholders

### **5.7.3 Construction Phase**

During the Construction Phase, the objectives of stakeholder engagement, taking into consideration regulatory requirements and good practice guidelines are to:

- Identify stakeholders most likely to be affected by construction.



- Communicate job opportunities
- Increase transparency and promote trust by;
- Aiming for rapid response times in resolving grievances

#### **5.7.4 Operational Phase**

During the Operations Phase, stakeholder engagement seeks to meet the following objectives:

- Hire, train and deploy the right personnel
- Keep grievance mechanism operational.
- Ensure integration of ongoing stakeholder commitments into operations management systems.
- Create clear reporting lines between the community liaison function and senior management

#### **5.7.5 Decommissioning Phase**

During the Decommissioning Phase, stakeholder engagement will seek to meet the following objectives:

- To ensure that stakeholders have a good understanding of the project decommissioning plan and the possible implications of the project decommissioning
- To receive stakeholder feedback and contribution to the decommissioning plan
- To address stakeholder concerns and expectations with regards to decommissioning of the project

## **6 Resources and responsibilities**

APCL is accountable for the management, coordination and implementation of this SEP. Kurrent Technologies (KTL) will provide technical support for stakeholder engagement activities associated with the ESIA phase of the proposed project.

### **6.1 APCL responsibilities**

APCL bears the role to:

- a) Avail sufficient resources for the efficient implementation of the SEP
- b) Approve the contents of the SEP, and any further revisions
- c) Integrate this SEP into company operations. Ensure effective internal dissemination of this SEP and staff capacity building for successful implementation of SE activities.
- d) Facilitate regular (annual) review and amendments of the SEP
- e) Approve, prior to release, all communication materials for the company for both internal and external communications
- f) Maintain all SEP related records (physical and electronic)
- g) Manage and regularly update SEP databases including stakeholder database, grievance registers, etc.
- h) Support and guide KTL in seeking relevant data from stakeholders
- i) Participate in all face to face stakeholder meetings by identifying a suitable company representative to accompany KTL
- j) Review and approve reports of all engagement events including minutes and issues and response reports

### **6.2 Kurrent Technologies Ltd responsibilities**

KTL is responsible for preparing the SEP for approval by APCL and implementing SE activities associated with the ESIA phase These include:

- a) Arranging all face to face meetings (or telephone calls) with each stakeholder, in close liaison with a contact from APCL
- b) Prepare conclusive reports on the SEP implementation activities
- c) Analyze the project context and provide APCL with technical advice on all stakeholder engagement undertakings
- d) Prepare in draft form, for approval by APCL, all communication and consultation materials and tools used in stakeholder engagement activities
- e) Participate during all public meetings, workshops and face to face stakeholder meetings

## **7 Grievance Mechanism**

A formal Grievance Management procedure has been developed to facilitate external communications with the affected parties and to manage complaints/grievances from communities and other local stakeholders that could potentially arise from the implementation of the 1,050 megawatts power plant project. The Grievance Management Procedure is appended to this SEP as appendix 1.

The APCL Grievance Management Procedure is a step by step approach for receiving, acknowledging and registering, reviewing, investigating and resolving complaints and grievances from all stakeholders who consider themselves adversely affected by the company's operations. The Procedure will enable stakeholders to raise questions or concerns with the Company and have them addressed in a prompt, systematic and respectful manner. The procedure sets out the steps to be taken to resolve grievances, role players involved in the process and timeframes to resolve grievances. The application of the grievance procedure is expected to result in a system wide process to promote mutual confidence and trust and strengthen the relationship between APCL and the communities living within the project area.

The APCL Grievance Management procedure will capture grievances arising from actual project impacts, as well as issues which are simply perceived to be related to APCL, irrespective of whether they derive directly from APCL or APCL Contractor activities. Stakeholders who consider themselves affected by Amu Power Company Limited activities will have access to this Procedure at no cost.

The procedure is focused on communities and other stakeholders and does not incorporate employee–employer related grievances, which will be addressed through other channels.

The procedure will be reviewed annually based on stakeholder input and, monitoring and evaluation outputs, to improve company performance regarding management of stakeholder grievances.

## **8 Monitoring and reporting**

Continuous monitoring and evaluation of the stakeholder engagement process is vital to ensure Amu Power Company Limited is able to respond to identified issues promptly, learn from lessons, and adapt the SEP strategy to ensure it remains relevant and effective. Allowing stakeholders to provide comments and participate holds strategic value since stakeholder and project risks can be identified and addressed early.

Adherence to the following commitments/activities will assist in achieving successful engagement:

- Sufficient resources to undertake the engagement
- Use of participatory approaches
- Clearly defined approaches
- Clearly defined timelines
- Inclusivity (inclusion of key groups) of interactions with stakeholders
- Promotion of stakeholder involvement
- A sense of trust between APCL and stakeholders
- Transparency in all activities

### **8.1 Stakeholder involvement in SEP monitoring**

The components of this SEP provide opportunities where stakeholders, particularly affected communities, can partake in discussions about project progress throughout the project lifecycle. This is mainly through open channels for the stakeholders to express their views and concerns. Such channels include structured feedback mechanisms like:

- Grievance mechanism including the establishment of an GM Appeals Committee comprising of community members
- Access to project offices
- Regular stakeholder consultation forums
- Social media channels
- Suggestion boxes

### **8.2 Reporting to stakeholders**

Similar to stakeholder involvement in project monitoring, the SEP provides various opportunities for APCL to provide feedback to stakeholders throughout the project lifecycle. This is vital to ensure integrity of the stakeholder engagement process.

Various reporting mechanisms may be employed including:

- Regular community/public briefing forums

- Annual monitoring reports
- Website and social media updates
- Company corporate sustainability report
- Company newsletter
- ESIA report and subsequent updates
- Grievance mechanism updates

While APCL will endeavor towards a firm commitment to reporting to stakeholders, the principle of responsiveness does not require that APCL agrees or complies with all stakeholder concerns and interests, but that it responds coherently and consistently to them. Thus adequate responses should include acknowledgement of the key concerns, a prioritization of issues (including how this was determined), what has taken place since the dialogue, benchmarks, and next steps within a fixed timeframe.

It is critical that APCL defines and discloses clear reporting parameters to manage stakeholder expectations. These may include:

- Reporting cycle (monthly, biannual, annual etc.)
- The types of reports to be expected
- How reports can be accessed and
- Contact point for questions regarding reports or their contents

APCL should also ensure that reports are easily accessible by the intended stakeholders/recipient. Deliberate effort should be made to ensure vulnerable stakeholder groups are able to access reports and other pertinent information. Additionally, report formats should take into consideration the language, culture and literacy levels of the different stakeholder groups. Where necessary, translation of key documents into the Swahili language should be considered. Where literacy levels are known to be significantly low, strategies for verbal reporting should be considered. These may include public meetings and focus groups.

### **8.3 SEP monitoring and reporting framework**

To assure efficacy of the SEP implementation, monitoring and reporting, it is essential that support mechanisms be instituted into the company. These include:

- Elaborate organizational systems to ensure that SE activities are scheduled and implemented seamlessly
- An SE focused organizational structure that ensures internal alignment and coordination between all parts of the company that are involved with SE
- Skill and internal capacities to effectively engage with stakeholders at all levels in the Organization and manage the SE process
- Staff numbers and capabilities to engage with stakeholders effectively. This includes incorporating contractors and consultants part of the process as they will be seen as an extension of the Organization and stakeholders expect a constant style of engagement

Stakeholder engagement reports may be generated on monthly, quarterly and annual basis. The CLT however, will submit weekly structured field reports to the Corporate Affairs Manager. Specific stakeholder engagement projects will require dedicated monitoring plans and project reports. It is imperative that APCL defines reporting formats to ensure consistency and efficiency. Monitoring of stakeholder engagement activities will be effected in 3 phases based on timing:

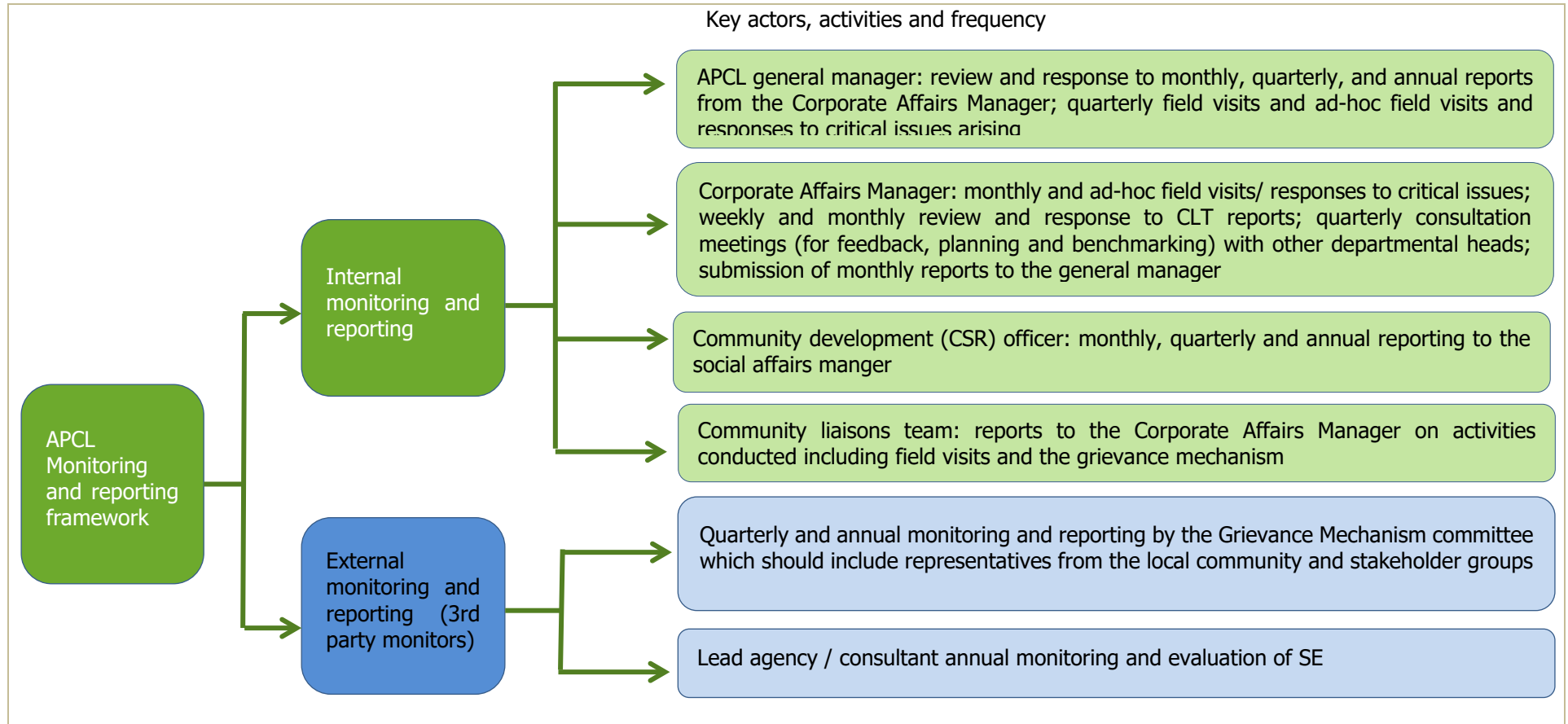
- a) Short term monitoring during an engagement activity to allow for adjustments/improvements to be made during engagement
- b) Evaluation following completion an engagement activity to review outputs and effectiveness of the activity
- c) Long term monitoring and evaluation of all engagement activities to assess the effectiveness of the SEP as implemented and adapt strategy as necessary. Evaluation and monitoring of long term impact should be maintained during and after decommissioning of the power plant.

Key performance indicators that reflect the objectives, purpose of engagement and timeframe of activities will guide the SEP monitoring and evaluation framework against which success of activities will be measured. These may include:

- How many people are participating and through what institutional arrangement?
- What is the level of participation in key activities (e.g. numbers attending project workshops, training events)?
- Are project beneficiaries satisfied with project progress, outputs, and impact?
- How do beneficiaries assess their own levels of participation and its impact?

The APCL SEP monitoring and reporting framework provides two levels of monitoring and reporting. The first level involves procedures by internal actors (APCL staff and management). This level will require collaboration by all department heads within the company to advice, report and respond to stakeholder engagement issues associated with the various departments. The Health, Safety, Environment and Quality assurance manager is crucial to the monitoring process and should play an active role in driving this process. The second level involves monitoring by external parties (grievance committee which should include community members and key stakeholder groups). Figure 8-1 outlines the recommended monitoring and reporting framework.

**Figure 8-1: SEP monitoring and reporting framework**



## 9 Management functions

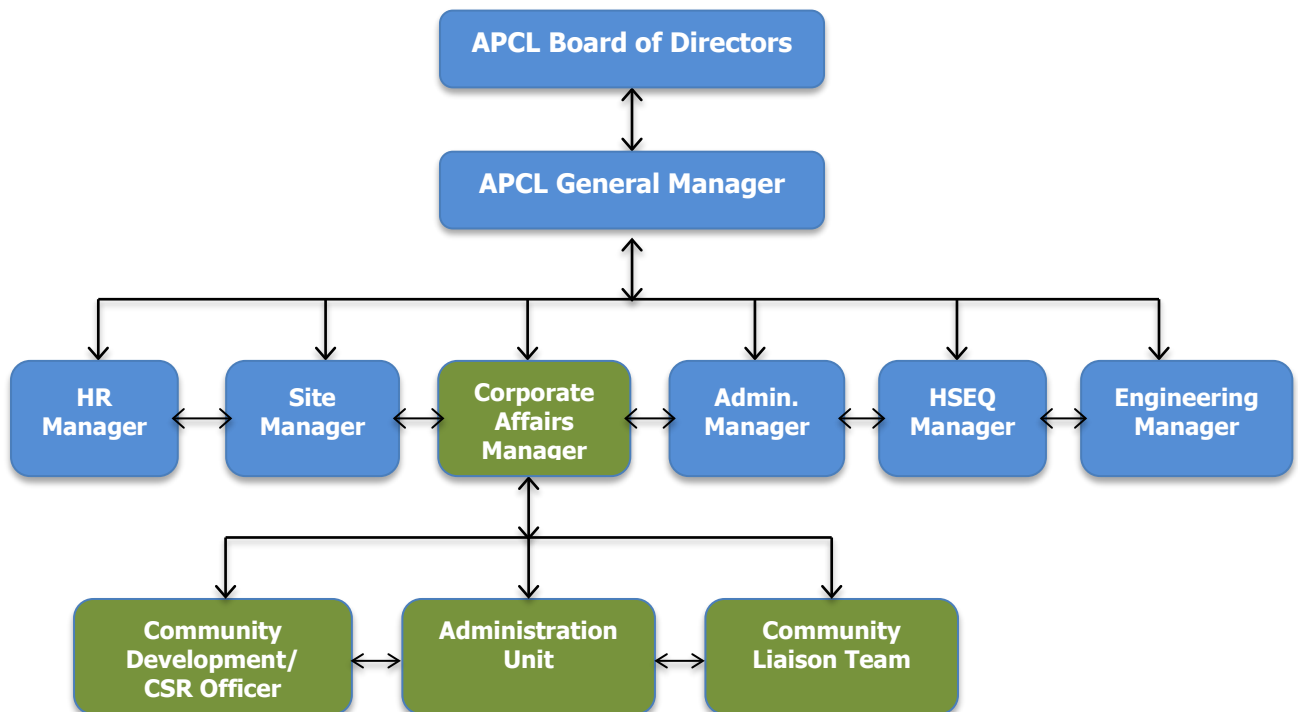
This section outlines approaches to integrate stakeholder engagement activities into APCL’s management strategy. This includes:

- Proposed organizational structure for STAKEHOLDER ENGAGEMENT
- Management Roles
- Capacity building for STAKEHOLDER ENGAGEMENT

### 9.1 Proposed organizational structure for stakeholder engagement

An organizational structure is proposed for adoption by APCL as outlined in Figure 7 below. APCL may need to adapt and change this structure in line with changes in project environment and of stakeholder interests.

**Figure 9-1: Proposed Organizational structure for stakeholder engagement**



### 9.2 SEP Management Roles

It is advised that an internal team be established in support of effective implementation of the SEP and which will be responsible for all stakeholder engagement related functions. The team should include the functions listed below.



### **9.2.1 Corporate Affairs Manager**

Responsible for overseeing and coordinating all activities associated with stakeholder engagement and reports directly to the General Manager.

### **9.2.2 Community Development/CSR Officer**

Responsible for implementing all activities associated with the CSR programme. The Community Development/CSR Officer will work closely with the stakeholder engagement team to design and coordinate community development activities.

### **9.2.3 Community Liaison Team (CLT)**

The CLT consists of the Community Liaison superintendent, Community Liaison Officers (CLOs) and key community contacts. The team is responsible for implementing community engagement activities and maintaining continuous engagement with communities at grassroots level. The CLOs will be based at the project office and report weekly to the social manager through structured field reports.

Key community contacts will be selected from and operate within the community. They will assist the CLO with:

- Gauging the community's status on potential risks
- Gauging the attitudes towards the project
- Logistical arrangements within the community
- Changes in community dynamics

### **9.2.4 Administration unit**

The Administration unit will be responsible for managing all activities related to the database, documents and stakeholder engagement logistics. Specifically, the administration functions include document and database management respectively.

#### **9.2.4.1 Document management**

Capture and file stakeholder engagement documents / records, both physical and electronic. These include, but isn't limited to: grievance records; attendance registers; letters; post; emails notes; suggestions; complaints; memos; statements; reports; strategies and plans; agreements; surveys; notification materials; maps; print materials; adverts; articles.

#### **9.2.4.2 Database management**

The administration unit will continuously update stakeholder engagement databases including:

- Stakeholder information (contact details, Organizational details, designation, engagement activities);
- Grievance Mechanism records (grievance records, grievance log, agreements, meeting registers)

#### **9.2.4.3 Logistics management**

The administration unit will assist the Community Liaison Team in logistical arrangements. This will also include production of official communication and necessary documentation for stakeholder engagement activities.

#### **9.2.5 Integration/support**

This is a critical aspect in managing the stakeholder engagement process that describes the interaction with other departments, initiatives or projects. Stakeholder engagement activities are not autonomous to other project activities. It is therefore essential that to ensure collaboration and regular consultation between the Corporate Affairs Manager and other key decision makers in the company such as Human Resource Manager, Safety, Health, Environment, Quality Manager, Engineering Manager, Site Manager and Corporate Affairs Manager.

A proposed structure for these consultations can be through regular (quarterly) managers' meetings and access to a data bank for key departmental documents (plans, reports and decisions)

### **9.3 Capacity building for stakeholder engagement**

Effective stakeholder engagement requires a set of competencies, expertise and skills that need to be acquired through training, recruitment, or the hiring of consultants. It is advised that Amu Power Company Limited makes deliberate effort to recruit personnel with the relevant skills and qualifications to undertake the stakeholder engagement work. Where appropriate, recruitment priority will be given to members of the local community. APCL should also ensure continuous skill and internal capacity building for effective implementation of stakeholder engagement activities.

Capacity building for stakeholder engagement should not be limited to APCL personnel. In order to empower stakeholders, enrich their participation and ensure a shared vision, APCL should include capacity building strategies for key stakeholder groups.

The approach to strengthening capacities for stakeholder engagement is geared towards:

- Ensuring organizational ability to respond to stakeholders in relation to the internal enablers such as systems, governance, management commitment
- Considering and addressing Stakeholder resource limitations and requirements that may impede their effective participation
- Strengthening the skills of required individuals (from within the company and key stakeholder groups)

It is imperative that APCL, as part of the company's human resource strategy, institutes hiring and training plans that are responsive to the internal capacity requirements for stakeholder engagement. This may include conducting a needs assessment and gap analysis for the required capacities. A typical method of building capacity among various stakeholder is shown in Figure 9-2.

Figure 9-2: Stakeholder engagement capacity building approach

