



REPORT

Foundation Stage Development

ESIA Stakeholder Engagement Plan

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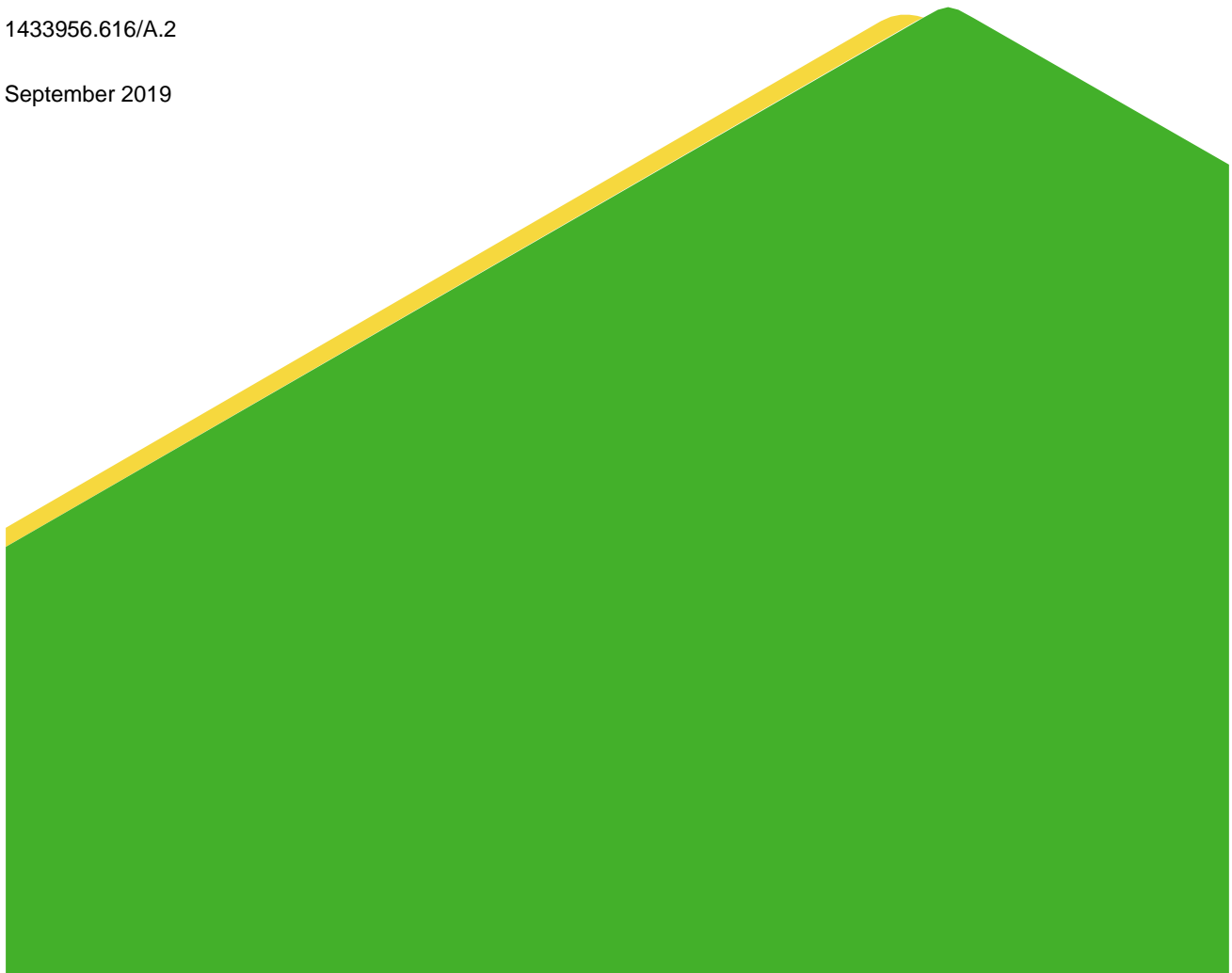
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1433956.616/A.2

September 2019



Distribution List

Tullow Kenya B.V. - 1 copy (pdf)

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Glossary of terms

- **Environmental and Social Baseline:** A component of an ESIA process undertaken to develop an understanding of the existing environmental and socio-economic conditions in the areas that may be affected by a Project. Baseline studies provide a basis for analysis of potential positive and negative impacts of a Project in the ESIA and, where possible, provides information for monitoring and measuring impact throughout implementation of the ESMP (see below).
- **Environmental and Social Impact Assessment (ESIA):** Formal assessment required when a project may create significant adverse impacts that are diverse and irreversible. An ESIA is often called an Environmental Assessment (EA) or Environmental Impact Assessment (EIA) in Kenyan legislation. Even if the word “social” is not included, readers should understand that the acronyms EA, EIA and ESIA are used interchangeably. The term and acronym adopted by this Project is “ESIA”.
- **Environmental, Social and Management Plan (ESMP):** Component of the ESIA that provides an action plan or series of plans for implementation of mitigation measures required to avoid or minimise adverse impacts and to optimise beneficial effects of a project. An ESMP also includes information on management, monitoring and reporting related to environmental and social performance.
- **Early Oil Pilot Scheme (EOPS):** An intermediate step to the full commercialisation of discovered resources in South Lokichar. EOPS involves the production of limited quantities of crude oil from existing well pads and existing wells (no additional land required).

The EOPS Project is divided into two stages. Phase I includes the trucking of stored crude oil produced during the Extended Well Testing (EWT) carried out during the exploration and appraisal phase. Phase II includes the production of limited quantities of crude oil from existing wells at Amosing and Ngamia fields and transportation of the oil using existing road infrastructure to Mombasa.

Phase I was permitted under the existing EWT EIA licenses and Phase II has a separate ESIA, which has been approved by NEMA and is available on the TKBV website and at all TKBV Community Resource Centres.

- **Scoping:** Scoping is the process of determining the content and extent of the matters that will be studied during the baseline and ESIA. The scoping process will vary depending on the proximity of surrounding communities, legal requirements, the capacity of authorities, and the specifics of the Project. The Scoping Report (or Project Report Study as defined by the National Environmental Management Authority (NEMA)) is submitted to the regulatory authority for review and approval along with the Terms of Reference (ToR) for the ESIA.
- **Socio-economic Investment:** Resources provided prior, to, and beyond, committed expenditure defined in the ESMP. Social investment is above and beyond international requirements and is part of TKBV’s goal to build positive and beneficial relationships with governments, communities and industry wherever it does business.
- **Stakeholder(s):** Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively (IFC, 2007).
- **Stakeholder Engagement Plan (SEP):** The SEP, sometimes called a Public Consultation and Disclosure Plan (PCDP), is a key component required for verifying compliance with international standards on public disclosure.
- **Foundation Stage Development (FSD):** A further step to the full commercialisation of discovered resources in South Lokichar. FSD consists on the exploitation of three existing oil fields (Amosing, Ngamia and Twiga) within Blocks 10BB and 13T in Turkana County. Oil will be exported via the Lokichar to Lamu Crude Oil Pipeline (LLCOP), which will be permitted under a separate ESIA.
- **Full Field Development (FFD):** The original name for the full commercialisation of discovered resources in South Lokichar. The name FSD replaces FFD.

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APPENDICES

APPENDIX A

Background Information Document

Acronyms

AOC	Africa Oil Kenya
BID	Background Information Document
bopd	barrels of oil per day
CDP	Community Development Plan
CFA	Central Facilities Area
CPF	Central Processing Facility
CRC	Community Resource Centre
EIA	Environmental Impact Assessment
EMCA	Environment Management and Coordination Act of 1999
EOPS	Early Oil Pilot Scheme
ESIA	Environment and Social Impact Assessment
ESMP	Environment and Social Management Plan
FFD	Full Field Development
FSD	Foundation Stage Development
FSEO	Field Stakeholder Engagement Officers
FSSE	Field Supervisor Stakeholder Engagement
GPA	Government and Public Affairs
IFC	International Finance Corporation
KWS	Kenya Wildlife Service
LLCOP	Lokichar to Lamu Crude Oil Pipeline project
MCA	Members of the County Assembly
MMbbl	million barrels of oil
NEMA	National Environment Management Authority
NGO	Non-government Organisation
NLC	National Land Commission
NTS	Non-Technical Summary
PAP	project affected people
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference

TKBV	Tullow Kenya B.V
VSOs	Village Socialisation Officers

1.0 INTRODUCTION

This document has been prepared by Golder Associates UK (Ltd) (Golder) for Tullow Kenya B.V. (TKBV). This Environmental and Social Impact Assessment (ESIA) Stakeholder Engagement Plan (SEP) is a planning and management document for the Foundation Stage Development (FSD) ESIA. The ESIA SEP presents the main activities, and programme to be delivered as part of the ongoing engagement process with key project stakeholders for the FSD ESIA. As the FSD develops, the SEP will be revised and updated to reflect any planned stakeholder engagement activities related to significant changes or alterations to the Project (e.g. in Project design parameters).

It is important to highlight that this SEP is in line with previous engagements described in the SEP for Full Field Development (FFD) 14514160360.501, dated November 2014, and the Project is described in the FFD Project Report: Golder document: 14514160360.516, dated December 2015.

FSD is a separate project from other related developments by the Project proponent TKBV, such as South Lokichar Early Oil Pilot Scheme (EOPS) and Lokichar to Lamu Crude Oil Pipeline project (LLCOP), which have a separate SEP and ESIA.

1.1 Objectives

The FSD ESIA SEP presents and explains the main activities and programme to be developed by TKBV to continue the engagement process with key stakeholders during the preparation of the FSD ESIA and throughout the lifespan of the FSD.

As part of the ESIA process, stakeholder engagement will accurately capture issues, comments and questions from stakeholders in a meaningful manner. This information will be included as appropriate in the ESIA. Therefore, it is essential that all key stakeholders are involved to the FSD engagement process.

2.0 REGULATIONS AND INTERNATIONAL STANDARDS

The ESIA and SEP must comply with the following Kenyan legislative, regulatory and policy requirement, IFC performance standards and Tullow company policies.

2.1 Kenyan National Regulations

The Kenyan regulatory framework contains a number of stakeholder engagement requirements. The principle relevant regulations and requirements are as follows:

- The Constitution of Kenya (2010):
 - Article 1(2) provides that all sovereign power belongs to the people of Kenya. It further states that people may exercise their sovereignty directly or through their elected representatives. Public participation is direct exercise of sovereignty;
 - Article 10(2) indicates that public participation is among the national values and principles of governance;
 - Article 33 guarantees the freedom of expression including the freedom to seek, receive or impart information or ideas;
 - Article 35 provides for the right to access information. It guarantees every citizen the right to access information held by the state;
 - Article 42 that every person has a right to a clean and healthy environment. Subsection 1 adds that this includes the protection of the environment for the benefit of present and future generations through legislative and other measures;

- Article 43 follows declaring the economic and social rights of every Kenyan and details them in subsections: (a) the right to the highest attainable standard of health, (b) which includes the right to health care services, (c) including reproductive health care and (d) the right to clean and safe water in adequate quantities;
- Article 174(c), gives powers of self-governance to the people. The people can derive direct benefit from meaningful public participation as this contributes to better informed decision-makers armed with additional facts, values and perspectives obtained through public input;
- Article 174(d) recognizes the rights of communities to manage their own affairs and to further their development. Article 232(1) (d) provides for the involvement of the people in the process of policy making and part (f) provides for transparency and provision to the public of timely and accurate information. Access to information for Kenyan citizens is guaranteed by Article 35 of the Constitution; and
- Article 37 and 104 include a provision on grievance mechanisms, including a right to assemble, demonstrate, to picket and to present petitions or seek redress within the judicial system; and
- Environment Management and Coordination Act 1999 & 2003.

Environmental Management & Coordination Act (1999): establishes the principle of public participation in the development of policies, plans and processes for the management of the environment, including within the EIA process.

Environmental (Impact Assessment & Audit) Regulations (2003) (as Amended): Reg. (17) contains public participation requirements during the ESIA study regarding seeking the views of the people or communities which are likely to be affected by the Project. This includes requirements related to public announcements and notices, public meetings and recording of oral and written comments.

- The Draft Environmental Management and Coordination (Strategic Assessment, Integrated Impact Assessment and Audit) Regulations, 2018.

The draft regulations provide for the need to register environmental assessment experts and the requirement for an environmental assessment expert licence. The regulation spells out requirements for a project report as well as the submission comment and authorisation process. The regulations spell out the requirements for the integrated environmental impact assessment, environmental audit and monitoring, and strategic environmental assessment processes in some detail.

The need for stakeholder engagement is indicated in a number of aspects. Of specific relevance is a requirement to invite comments by the public, development of a SEP as well as reporting on the implementation thereof.

2.2 International Standards

TKBV has committed to meet the requirements of the IFC Performance Standards on Environmental and Social Sustainability (2012). The IFC Performance Standards set out a framework for managing and improving project performance from planning and assessment, through construction and operations to closure and after-care.

The IFC Performance Standards state that stakeholder engagement is an ongoing process that may involve, in varying degrees, the following elements: stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism, and ongoing reporting to Affected Communities.

Specific requirements of the IFC PS1 includes:

- Stakeholder Analysis and Engagement Planning:

- Identify affected stakeholders and other stakeholders that may be interested in the project and consider how external communications might facilitate a dialogue with all stakeholders; and
- Development of a SEP, including measures to allow for the effective participation of stakeholders identified as disadvantaged or vulnerable;
- Disclosure of Information:
 - Provision of relevant project information on (i) the purpose, nature and scale of the Project; (ii) duration of the proposed activities; (iii) any risks to and potential impacts on such stakeholders and the relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism;
- Consultation:
 - Undertake a process of consultation that provides affected stakeholders with opportunities to express their views on project risks, impacts and mitigation measures;
 - Include a two-way process which (i) begins early in the process of identification of environmental and social impacts and continues on an on-going basis as impacts arise; (ii) is based on prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information that is in a culturally appropriate local language; (iii) focuses inclusive engagement on those directly affected as opposed to those not directly affected; (iv) is free of external manipulation, interference, coercion, or intimidation; (v) enables meaningful participation where applicable; and (vi) is documented; and
 - Tailor consultation to the language preferences of the affected communities, their decision-making process and the needs of disadvantaged or vulnerable groups;
- Informed Consultation and Participation:
 - Conduct an Informed Consultation and Participation (ICP) process that will result in affected stakeholders' informed participation;
 - Managed a consultation process that (i) captures both men's and women's views, if necessary, through separate forums or engagements, and (ii) reflect men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate; and
 - Document the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the affected communities, and will inform those affected about how their concerns have been considered;
- Free, Prior, and Informed Consent:
 - For projects with adverse impacts to Indigenous Peoples (IP), the Project is required to engage them in a process of ICP and in certain circumstances the Project is required to obtain the Free, Prior, and Informed Consent (FPIC) of IP.
- External Communications:
 - Implementation of a procedure for external communications that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track and document responses; and (iv) adjust the environmental and social management program;
- Grievance Mechanism for Affected Stakeholders:
 - Establish a grievance mechanism to receive and facilitate resolution of affected stakeholders' concerns and grievances about the environmental and social performance; and

- Inform the Affected Stakeholders about the mechanism in the course of the stakeholder engagement process;
- On-going Reporting to Affected Stakeholders:
 - Provision of a schedule for periodic reports to the affected stakeholders that describe the progress with implementation of the Project action plans on issues that involved ongoing impacts on affected stakeholders and on issues that the consultation process or grievance mechanism have identified as a concern to those communities; and
 - Provision of reports not less than annually (IFC, 2012).

2.3 TKBV Policies

The FSD stakeholder engagement will be governed by TKBV's internal policies and standards and the TKBV Stakeholder Engagement Guide, listed below:

- Identify and assess all stakeholders directly or indirectly affected by planned activities based on the Project's potential risks and adverse impacts;
- Develop and implement a Stakeholder Engagement Plan that is scaled to project risks, potential impacts and the stage of the Project, that describes how stakeholders will be provided with access to timely, relevant, understandable and accessible (i.e. culturally appropriate and in the local language) information, and that describes how project impacted people will be provided an opportunity to discuss and have input into project design, scope, impacts and mitigation measures prior to the start of project activities;
- Identify priorities of impacted peoples regarding economic and social development aspirations and take steps to increase understanding of traditional resource use, economic activity, local decision-making practices, location of cultural heritage sites in the areas of operation;
- Establish a commitment register to document any and all commitments made on behalf of TKBV and track, report and record progress towards completion of all commitments in the register;
- Establish a Grievance Mechanism compatible with the level of risks and impacts associated with the Project's activities to facilitate resolution of any grievances arising in relation to its activities prior to conducting operations:
 - Ensure that the Grievance Mechanism process is straightforward and easy for all segments of impacted stakeholders to use at no cost;
 - Design the Grievance Mechanism in a manner that minimises the potential for retribution against a grievant and does not impede access to other remedies;
 - Consider local language, gender roles, traditional decision-making processes and communications preferences;
 - Document the various requirements of the Grievance Mechanism and ensure that all applicable staff and contractors are familiar with the process and can adequately explain it to external stakeholders;
 - Ensure that all applicable staff and contractors are fully informed about the Grievance Mechanism through its stakeholder consultation activities and communications materials;
 - Establish maximum timeframes for formally acknowledging a grievance/complaint and ensure resolutions are achieved as promptly as possible;
 - Establish a formal Grievance Register to record, investigate, and track resolution of all grievances and complaints; and
 - Monitor the use and effectiveness of the Grievance Mechanism and its outcomes with a view towards continuous improvement.

3.0 OVERVIEW OF PREVIOUS ENGAGEMENT

TKBV has been active in Kenya since 2010. During this period, the extent of stakeholder engagement activities at a national, county and local level has increased substantially. This increase has been driven by several factors including:

- An increase in exploration and appraisal activities (e.g. seismic and drilling operations);
- The geographic footprint of the operations expanded significantly between 2013 and 2015 as new basins/areas were targeted within the extensive licence areas (although activities are now concentrated in the South Lokichar Basin);
- The on-going management of new contractors with different operating models and experience;
- Changes in government roles and responsibilities as a result of newly devolved County Government powers; and
- Increasing requests for information from stakeholders.

During the course of previous engagement and consultation activities, stakeholders have raised vastly different issues, which have been captured in stakeholder issues and response spreadsheets and addressed by TKBV and Golder.

Various engagement methods have been utilised with prioritisation to oral and visual engagement, given the prominence of such methods in Turkana's traditional society. Engagement methods have included:

- Engagement through the existing Community Resource Centres (Nakukulas, Lokichar, Lokori and Lodwar in Turkana County);
- Individual, focus group or *baraza* (traditional community meeting) community engagement;
- Information, education and communication material, including written materials and video;
- Preparation and distribution of a monthly community newsletter, *Eana Atopupokin*, Turkana for "Let's Talk and Agree";
- Participation in radio engagements;
- Use of theatre groups to explain specific topics such as the TKBV's Grievance Mechanism; and
- Targeted site visits for community representatives and leaders, in order, to explain ongoing TKBV activities.

TKBV has four Community Resource Centres (CRC) in Lodwar, Lokichar, Nakukulas and Lokori. The CRC allow the opportunity for walk-in visitors to receive project information, to ask questions, and to log issues/grievances. The CRC are manned by Community Communications Coordinators. TKBV also has a team of Field Stakeholder Engagement Officers (FSEO) who support day-to-day operations engaging with local stakeholders. TKBV also has dedicated Grievance Officers responsible for managing the TKBV Grievance Mechanism (see further information in Section 8.0).

3.1 Full Field Development (FFD) Scoping Consultation

At scoping stage, FFD project information was communicated to stakeholders, rather than what is now called FSD. FFD was described as development of up to 5 fields, rather than the 3 identified for FSD. The rest of the project described at scoping remains the same for FFD as for FSD.

ESIA scoping consultations for FFD were initiated by a Golder and TKBV team in November 2015 and included a series of meetings to disclose the Project concept and explain the ESIA process. Consultations were held with government, international organisations, international, national and regional NGOs and regional media.

The objectives for each meeting were:

- Provide information on the Project and details of the ESIA process to key stakeholders;
- Align the ESIA approach with national regulations and international lender requirements;
- Document issues, questions and concerns that need to be considered and addressed during the later stages of the ESIA and reflected in the ToR; and
- Solicit feedback from key national and regional stakeholders on our approach to consultation with a wider group of stakeholders, especially potentially project affected people (PAPs).

During the meetings listed above, a total of 188 issues, questions and concerns were documented. They are presented below (% of total issues in parenthesis):

- ESIA General Inquiries – 18%
- Engagement – 16%
- Environment – 16%
 - Water – 9%
 - Biology – 3%
 - Pollution/Waste – 3%
- Land Access & Acquisition – 15%
- Community Aspects – 11%
 - Benefits – 4%
 - Health, Safety & Security – 3%
- General Project Updates / Inquiries – 8%
- National Content – 5%
- Security – 3%
- Northern Rangelands Trust – 3%.

3.2 Engagement for EOPS Phase II

ESIA scoping consultations were held in May and June 2016. These meetings consisted of a series of sessions to disclose the approach to the EOPS Phase II ESIA. The EOPS ESIA consultations started in June 2018 with the majority of the meetings in late September 2018. In each meeting, the consultation team sought to:

- Provide information on the EOPS Project and review the EOPS ESIA process to key stakeholders;
- Explain how the ESIA approach addressed both national regulations and international lender requirements;
- Document issues, questions and concerns; and
- Solicit feedback from key national and regional stakeholders for future consultation.

During the meetings, a total of 327 issues, questions and concerns were documented. The following represents the most frequently raised issues (% of total issues in parenthesis):

- Community Aspects (health, safety and security, benefits, cultural heritage and social maladies) - 21%;
- Environment (including water, air quality, biology, pollution, traffic, visual and soil) – 20%;

- Engagement – 18%;
- Project Updates/Inquiries – 14%;
- ESIA General Inquiries – 7%;
- National Content – 6%;
- Land Access & Acquisition – 6%; and
- Security – 4%.

4.0 STAKEHOLDER IDENTIFICATION

Stakeholders are persons or groups who are directly or indirectly affected by a project, as well as those who may have interests in a project and/or the ability to influence its outcome, either positively or negatively.

Formal stakeholder identification exercises were conducted for the following areas:

- Significant urban centres relevant to the Project; and
- Affected communities and interested parties.

Stakeholders have been identified throughout the lifetime of the Project by various functions within TKBV (including Social Performance, Communications, Government and Public Affairs, National Content, Asset Protection) with the purpose to involve groups of people directly and indirectly influenced by the Project (please, refer to Appendix A Background Information Document for additional Project information).

A consolidated stakeholder register has been developed. Stakeholders are categorised based on their area of geographical interest and alignment or otherwise with TKBV operational footprint. A total of approximately 300 stakeholders (either individuals or groups) have been identified and recorded in the register.

The stakeholder register considers those stakeholders who may have vulnerable status. Vulnerable groups may be defined as people that by virtue of gender, ethnicity, age, disability, economic disadvantage or social status may experience different or unique effects from the Project than others. The following measures will be implemented to enhance the ability of vulnerable stakeholder groups to participate meaningfully in the ESIA process:

- During the continued process of stakeholder identification, TKBV will identify disadvantaged or vulnerable persons or groups; and
- Staff will identify consultation approaches and activities that will support effective engagement of vulnerable persons.

The consolidated stakeholder register will be updated on an on-going basis as new stakeholders are identified and TKBV activities change.

4.1 Stakeholder Groups

Project stakeholders include individuals, groups, communities, businesses, local government authorities, non-governmental organisations, faith-based organisations and other institutions. Table 1 provides a summary description of the main stakeholder groups linked to project activity.

Table 1: Summary description of key Project Stakeholders

Category	Stakeholder Group
Community Stakeholders	<p>Traditional leadership, including:</p> <ul style="list-style-type: none"> ■ Council of Elders (Turkana only); ■ Traditional governance leaders, such as seers and elders in permanent settlements (adakar) and mobile/pastoral administrative units (arumrum); and ■ Chief's Elders. <p>Project-affected settlements, including:</p> <ul style="list-style-type: none"> ■ Women; ■ Vulnerable persons; ■ Youth; and ■ Disabled persons.
National Government Elected Positions	<p>Members of Parliament for all Constituencies in the FSD area of Influence Senators Women representative</p>
National Government Appointed Positions	<p>National Administration – County Commissioner, Deputy County Commissioners, Assistant County Commissioners, Chiefs and Assistant chiefs National Police services – County Commander, Sub-county Commanders, Officers Commanding Station Ministry of Petroleum and Mining – Petroleum Development Community Engagement officers at Sub-County Level</p>
County Government Elected Positions	<p>Members of the County Assembly (MCAs)</p>
County Government Appointed Positions	<p>Sub-county Administrators Ward Administrators National Land Commission – County Land Management Board</p>
County Executive	<p>County Governor County Deputy Governor County Secretary County Executive Committee (“Ministries” in Turkana County / “Departments” in West Pokot County):</p> <ul style="list-style-type: none"> ■ Health Services and Sanitation; ■ Finance and Planning; ■ Tourism, Culture and Natural Resources / Tourism, Culture, Youth, Sports, Gender and Social; ■ Water, Irrigation and Agriculture / Water, Environment and Natural Resources;

Category	Stakeholder Group
	<ul style="list-style-type: none"> ■ Public Service and Disaster Management / Public Service, ICT and Devolved Units; ■ Agriculture, Pastoral Economy and Fisheries / Pastoral Economy, Agriculture and Irrigation; ■ Education, Social Services and Culture / Education and Technical Training; ■ Land, Survey, Housing, Physical Planning and Urban Area Management / Lands, Housing, Physical Planning and Urban Development; ■ Roads, Transport and Public Works / Roads, Publics Works, Transport and Infrastructure; and ■ Trade, Gender and Youth Affairs (Turkana only).
Business Community	Current and potential suppliers for FSD Turkana Chamber of Commerce Business Consortium Business Women Group
Water Institutions	Water User Associations and Water Service Providers
Media Organisations	Radio Stations: Sayare Radio, Akicha, Jambo, Maata
Faith-based Organisations	Diocese of Lodwar Turkana Pastor's Association
NGOs, Community-based Organisations and Donors	SIKOM Peace for Development Friends of Lake Turkana CordAid Turkana Basin Institute REACH World Vision Oxfam Kenya Extractive Industries Development Program Kenya Red Cross Human Rights Watch Danish Demining Group Northern Rangelands Trust Let Us Talk Turkana Empowerment Advocacy Group Turkana Pastoralists Development Organisation (TUPADO) St. Peter Community Network (SAPCONE) Turkana Civil Society Platform (coalition of 12 local CBOs) Turkana Natural Resource Hub Agency for Pastoralist Advocacy & Development (APAD) Alemun Pastoralist Empowerment Initiative (APEI) Turkana Women Advocacy Development Organization (TWADO) Turkana Development Organization Forum (TUDOF) National Environment Management Agency (NEMA) Water Resources Management Authority (WRMA)

Category	Stakeholder Group
	Turkana County Drivers Association (TUCODA) Health Organisations British Council United Nations Development Programme West Pokot Youth Bunge County Forum

4.1.1 Administrative Divisions and Governance

Turkana and West Pokot Counties are two of 47 Counties in Kenya. Each Sub-county is further divided into Divisions, Locations and Sub-locations. Within the County, Sub-counties are also divided into electoral Wards, each being represented by a Member of County Assembly (MCA) in the County Assembly. These administrative units represent two strands of governance. Divisions, Locations and Sub-locations are part of a National Government administrative structure. This overlaps with the Sub-county structure, however a Ward is part of the newly instituted devolution process. Sub-county Administrators and Ward Administrators are part of the County Government administration structure. The Constitution of Kenya (2010) set up these two levels of government, making a shared mandate between the national government and counties.

4.1.2 Traditional Governance and Vulnerable & Marginalised Communities

TKBV seeks to achieve the principles of Informed Consultation and Participation by developing robust, open and transparent channels of communication with all Project-affected marginalised groups. Achieving communication with Vulnerable & Marginalised Communities requires developing direct lines of engagement with different categories of stakeholders that each represent different interests among that group of people. These multiple lines of engagement must provide a reasonable and equal opportunity to participate, receive information in advance and to receive information in a culturally appropriate format that allows them to understand how the project and proposed mitigation and benefit enhancement will affect their lives. With this in mind, engagement must be freely open to multiple entities. These entities are divided into categories described in the table above. The priorities among these categories are those stakeholders that are from regional administrative units affected by the Project or that represent the Project-affected people, with a priority to engage and pursue agreement from Traditional and pastoralist groups, but also considering:

- i) County Government Elected and Appointed officials who represent traditional and pastoralist groups; and
- ii) National Government Elected and Appointed officials who represent traditional and pastoralist groups.

For these formal government structures, it has been relatively simple to identify specific stakeholders that represent Project-affected people, including vulnerable groups. However, additional work has been conducted to identify and prioritise traditional leadership. Specifically, this work has involved the identification of traditional pastoralist units (*Adakar*, *Arumrum*¹ or *Mongots*²) within a given administrative unit. While it is clear that County Government and National Government officials are key representatives of pastoralists, there are other traditional structures that exist and need to receive an opportunity to receive information and give feedback.

In addition to identifying County and National Government officials, Golder has initiated the identification of all traditional pastoralist units within a given County or National administrative unit. Experience has clearly shown

¹ These are terms for clusters of homesteads. Adakar are sometimes referred to as "cattle camps" even if the herd does not contain cattle. This term is used interchangeable with the term kraal, a term more commonly used in South Africa. Arumrum is a relatively new form of social organisation that started in the mid-1990s. It is a large encampment of multiple heard owners that seek to build barriers to fend off attacks from outsiders. Such clusters can be up to 100 households.

² This refers to a traditional pastoralist grouping of homesteads in West Pokot.

that while County and National officials have direct lines of contact with traditional leaders, some traditional leaders may have felt excluded. This is partially linked to the mobile nature of the traditional groups and their challenges in convening in centrally located settlements.

5.0 STAKEHOLDER ENGAGEMENT PROGRAMME

5.1 Integration with ESIA

The results of stakeholder engagement will be integrated into the specialist baseline studies (as required) and impact analysis in the ESIA. Stakeholder issues must be considered in the ESIA and in the project planning and design.

Stakeholder engagement during the FSD ESIA should include the following phases:

- Phase 1: Golder and TKBV lead Scoping consultation (completed);
- Phase 2: Disclosure of the project during baseline studies, including the draft Background Information Document (BID), which is presented in Appendix A; and
- Phase 3: During impact assessment and mitigation planning, Golder will lead consultation on the results of the ESIA studies.

At the current time (July 2019), engagement is in Phase 2. Golder has shared an overview of the Project during its baseline studies, where data holders coincide with stakeholders, and will continue these efforts in conjunction with TKBV. The final phase is scheduled for 2019. The remaining FSD ESIA engagements will continue to build on engagement methods, materials and stakeholder identification. This work will be complemented by TKBV efforts to duplicate disclosure at the settlement level through public meetings. The frequency and level of detail required for these public meetings will be determined at the completion of Phase 2 of the engagement process.

5.2 Proposed Engagements Methods

The methods of engagement will seek to provide consistent messages about the FSD through the presentation or distribution of presentations, maps and documents. These methods will include, but will not be limited to:

- **Key informant interviews and Focus Group Discussions:** Stakeholder engagement is closely linked with environmental and social baseline studies. As specialists conduct primary data and information collection, they will also make sure key informants, Project-Affected People (PAP) and other interested groups receive standardised project information and have the chance to raise issues, concerns and questions;
- **Workshops/Seminars** – Workshops and seminars will be convened for stakeholders in various stakeholder groups. Such grouping will seek to provide sufficient time for people to raise issues and may be organised around specific themes;
- **Posters** – Information shall be presented via posters in select public places and communal areas. Pictorial content shall be used to facilitate communication to all interested parties. Such posters must present the project and related information visually, using methods such as 3D visualisations, flyovers, photography-based maps, overlays and so forth;
- **Settlement Meetings** – These meetings will be considered for ESIA disclosure to share information and receive comments or issues on the project-aspects discussed. These meetings may occur when and if necessary, to gain public opinion and maintain open avenues of communication; and

- **Media advertisements** – Media advertisement shall be considered to involve local stakeholders and raise awareness about various engagement events.

TKBV and Golder will also consider including other methods of distributing project information as appropriate, such as theatre groups and SMS messaging platforms.

5.3 Materials

TKBV and Golder team will use the most appropriate material for consultation meetings considering all needs from stakeholders (e.g. using visual illustrations and verbal explanations for illiterate stakeholders). These materials will not be limited to English language but Swahili, Turkana and any other local language as appropriate to maximise communication and understanding of the project-engagement.

The following consultation materials will be available during the engagement process at local, county and national level:

- A Background Information Document (BID): This document gives an overview of project features, scope of work and project area, and will provide contact information to continue capturing issues and responses from stakeholders;
- A Non-Technical Summary (NTS);
- Poster: A group of posters shall be produced and be available during engagements to provide a visual aid to some of the key messages in ESIA documents;
- Registration and comment sheets: this element should be available at all times for stakeholders to raise and send comments/issues to project proponent. Issues and responses are captured in a database and will be summarised within the draft ESIA;
- Power point presentations: Various visual presentations will be produced and will vary depending on the stakeholder group; and
- Project Oil Kenya website – a dedicated website designed to provide up-to-date information and contact details.

5.4 Process Record-Keeping

TKBV and Golder have and will keep records of stakeholder engagement activities, comments received and responses to these throughout the lifecycle of the FSD. The following aspects shall be considered as part of the record-keeping process during consultation:

- All stakeholder interactions shall be recorded. Contact details of individuals and institutions engaged shall be recorded and included into the Project stakeholder database;
- Minutes-of-meetings will be prepared as part of the records;
- An Issues and Response Report will be produced in order to capture issues raised at meetings. This report shall be available to attendees for verification at regular intervals;
- Digital photographs and video recordings on approval to participants attending engagements meetings; and
- Recording the times and content of media advertisements, radio broadcasts and interactive talk shows, and the issues raised during these consultation processes.

5.5 Schedule

5.5.1 Phase 2

As stated above, the engagement programme is currently in Phase 2, which is designed to disclose project details. This phase has also included making the distinction between EOPS Phase II ESIA and the renewed focus on FSD.

The stakeholder engagement programme will continue the identification of traditional leadership within Government and County administrative units in Turkana South, Turkana East and Pokot West Sub-counties. The completion of traditional leadership identification will be used in conjunction with National and County administrative units. Efforts will be made to give all leadership in Turkana and West Pokot an opportunity to receive information. However, there will be more concentrated work in those Sub-counties that are closer to the Project (i.e. where the Project anticipates any infrastructure to be developed, which potentially could affect traditional livelihoods).

Building on the past engagement, the remaining engagement in Phase 2 will primarily target County level leadership, with a specific effort to inform residents most likely to observe impacts related to the Project.

For both Phase 2 and Phase 3, engagement will concentrate on the Sub-counties where Project infrastructure is based. A map of Sub-county administrative units is shown in Figure 1. Leadership from all administrative units will be provided with an opportunity to attend engagement meetings. This is particularly important given the migratory practices of pastoralists who can travel great distances in their use of natural resources. However, it is not practical to hold local meetings in all local administrative units. Stakeholders farther from the host Sub-counties will be able to attend disclosure meetings, but these will be provided in strategic locations, such as County and Sub-county centres.

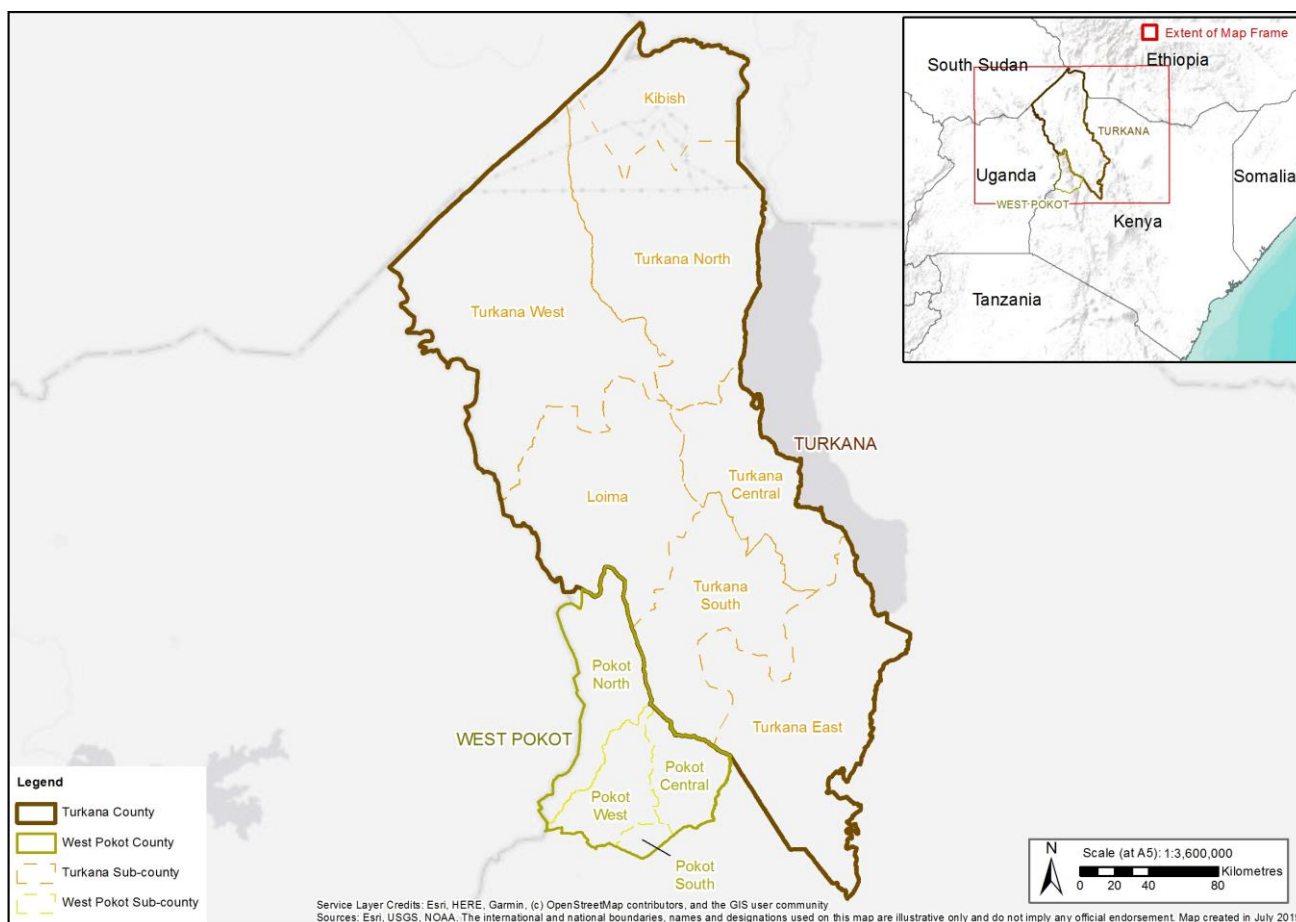


Figure 1: Turkana and West Pokot County and Sub-county administrative units.

The planned timeframe for engagement activities cover the following aspects.

Q3 2019

- Publication of SEP and tactical plan (to be produced by Golder).
- Update engagement tools: stakeholder register and issues and concerns matrix.
- Courtesy visits/calls and face-to-face meetings with National and County representatives to introduce engagement activities.
- Continue updating stakeholder register and issues and concerns matrix.
- Joint team (TKBV and Golder) to continue to extend geographic scope of mapping exercise with traditional leadership units within Turkana South, Turkana East and Pokot West sub counties.
- Fieldwork planning for project disclosure (letters of invitation, tactical plan, logistical arrangements).
- Update materials (if necessary) and engagement tools.

5.5.2 Phase 3

With the completion of the ESIA, including impact analysis and proposed mitigation commitments, the engagement programme is planned to enter the final phase in Q4 2019. Consultations will provide ESIA project information to stakeholders from the following levels:

Nairobi:

- National government officials and agencies; and
- National NGOs, multi-national organisations.

Lodwar / Kapenguria:

- National government officials;
- County government officials (Governor, County Executive Committee, Members of the County Assembly) County Ministries and technical specialists;
- Council of Elders (Turkana only); and
- Regional NGOs, multi-national organisations.

Turkana South & East Sub-counties / Pokot West Sub-county:

- National government officials;
- County government officials;
- Council of Elders (Turkana only);
- Sub-County Administrators;
- Ward Administrators;
- Village Administrators (positions being filled as part of devolution process under the new Constitution);
- Traditional leadership (Seers and Elders) in Locations, Sub-Locations, and Wards where infrastructure will be located;
- Local/International NGO/CSOs; and
- Community meetings.

Engagement events during this phase are based on the draft ESIA report, which includes baseline studies, impact analysis, mitigation or management strategies. Results of this consultation phase will be compiled, summarised and presented as part of the revised ESIA document and Engagement Report. As relevant, changes to the ESIA document resulting from engagement meetings will be indicated in the final report.

Following stakeholder engagement, Golder will update the Environmental and Social Management Plan (ESMP), which is an umbrella document that will include sub-plans for specific topics important for FSD. All stakeholders will be provided with an opportunity to review and comment on the findings of the ESIA, including the associated mitigation commitments that aim to reduce all negative impacts and enhance benefits to the extent possible.

6.0 APPROACH TO ENGAGEMENT

All disclosure and engagement activities will be organised to create various opportunities for people to receive information and give feedback. Within the process, there will be clear reporting on the number of meetings held. Revised ESIA and ESMP documents will highlight where the process causes substantial changes as a result of feedback and negotiation on the mitigation strategies. Benefit enhancement initiatives will be contained within a Community Development Plan (CDP).

The approach seeks to give all interested parties in each strand of governance an equal opportunity to consider the impacts, mitigation and benefit enhancement as a whole.

6.1 Outputs of Engagement Process

Prior to the finalisation of the ESIA, all environmental and social management actions will be disclosed. The output of communication with vulnerable and marginalised groups will be recorded in an Engagement Report. This will summarise all issues, comments and questions, as well as TKBV responses in relation to the project description, project impacts and project avoidance, minimization, mitigation and compensation, which will form a key part of the FSD ESIA. Plus, TKBV's initiatives to increase positive impacts will be captured through its regularly updated CDP.

Detailed documentation of all concerns, agreements and disagreements will be clearly summarised in an *Engagement Report*, to be included in the final version of the ESIA documentation.

7.0 ROLES AND RESPONSIBILITIES

The Golder stakeholder engagement team and TKBV team representatives will be principally responsible for implementing and delivering the stakeholder engagement process throughout the mentioned three phases. Representatives from both teams shall be present during these rounds of engagements, and be responsible to disclose project information, capture issues and comments and address project-related questions.

7.1 TKBV

TKBV management of the above-ground operating environment is delivered through several functions including Social Performance (Stakeholder Engagement, Land Access and Resettlement, Social Impacts, Social Investment), Government and Public Affairs (GPA), Communications, Human Resources – Manpower and Industrial Relations, Local Content and Asset Protection. These functions have defined objectives and annual work programs and budgets. The functions are resourced at both the national and Turkana levels. The Turkana-based team holds primary responsibility for the delivery of the FSD ESIA SEP.

In Turkana, TKBV engagement functions are distributed between several teams:

- The Stakeholder Engagement team comprises Field Supervisor Stakeholder Engagement (FSSE) and Field Stakeholder Engagement Officers (FSEOs);
- Village Socialisation Officers (VSOs) are also hired from settlements across the Project Area of Influence. These community members are asked to help FSEOs in distribution of information and reporting back when issues or questions arise among the population;
- Grievances are managed by a dedicated Grievance Officer, responsible for implementation of the Grievance Management Procedure;
- The Government and Public Affairs team comprises a GPA Coordinator and GPA Advisor;
- The Communications function comprises a field-based Communications Coordinator and Communication Officers located in the three TKBV Community Resource Centres (TCRC) in Lodwar/Turkana Central, Lokichar/Turkana South and Lokori/Turkana East respectively; and
- The Local Content function comprises a Socio-economic Investment & Capacity Building Advisor.

7.2 ESIA Stakeholder Engagement Team

The ESIA is managed by Golder Associates and work closely with TKBV managers to explain impact analysis, mitigation measures and management plans. Golder or sub-consultants working under Golder, have conducted the majority of ESIA engagements to date as it relates to information disclosure during baseline studies.

The main roles and responsibilities include:

- ESIA Project Manager: Andrew Morsley, responsible for delivering ESIA, direct liaison with TKBV Management team and Golder SE team;
- Stakeholder Engagement and Social Lead: Paul Lawrence, responsible for leading the SEP and tactical plans along the ESIA process, responsible to liaise directly with TKBV to plan and deliver SEP according to Kenyan National regulation and international standards;
- Stakeholder Engagement and Social Researcher: Priya Ramsaroop, responsible to support and work in close coordination with the Stakeholder Engagement and Social Lead in activities related to stakeholder engagement, mapping traditional leadership units, social field data gathering and analysis, and coordination with Regional Stakeholder Engagement sub-consultants; and
- Regional Stakeholder Engagement sub-consultants: Responsible for implementing SEP in close coordination with the Stakeholder Engagement and Social Lead. Fluent in Swahili and other local languages, and responsible for the coordination and support of the stakeholder engagement at the local level, through logistical support, invitation and meeting arrangements, meetings facilitation, minutes and issue capturing, translation or arrangement of translators as may be required and general process support.

7.3 Stakeholder Engagement Contact Details

Key contact information:

- Development Team TKBV Kenya BV
 - P.O. Box 63298-00619 Nairobi, Kenya
 - +254 20 428 6000
 - infokenya@TKBV oil.com
- Communications Team/Community Resource Offices
 - Lodwar: +254 701 482948
 - Lokichar: +254 701 483763
 - Lokori: +254 701 483740
 - Nakukulas: +254 798 481845
 - Kenya.fieldcommunications@TKBV oil.com
- Grievance Officer
 - Kenya.Grievance1@TKBV oil.com
 - +254 708 95 95 95

8.0 GRIEVANCE MECHANISM

During the exploration phase, TKBV operated an informal project-based grievance management system. While not guided by a defined procedure, this system allowed for the capture and resolution of grievances registered by impacted people within the area of operations.

In 2014 a formal Grievance Management Procedure was developed and a dedicated Grievance Officer was recruited. In 2015 a field-level Grievance Management Committee (internal committee chaired by the Field Operations Manager) was established to ensure appropriate levels of project management and clarity on

functional roles and responsibilities for investigation and resolution of grievances where necessary, and also as second tier level for review and resolution of registered grievances which require a review or have failed to be resolved at first order review.

The Grievance Management Procedure aims to ensure that individuals, families, groups, communities and other stakeholders within the project affected area are able to raise concerns, complaints or grievances; and that TKBV is able to effectively acknowledge, record, review and formally respond to grievances before they escalate into serious disputes.

8.1 Multi-tier system for review and resolution of registered grievances

TKBV use a multi-tier system in which a grievance that is not resolved in a first order review is considered again in a second order review. Data collated through this procedure is analysed on a monthly basis and assists in the identification of emerging and current social trends and risks for TKBV, lessons learnt and TKBV's impacts on the communities and how to improve outcomes and accountability.

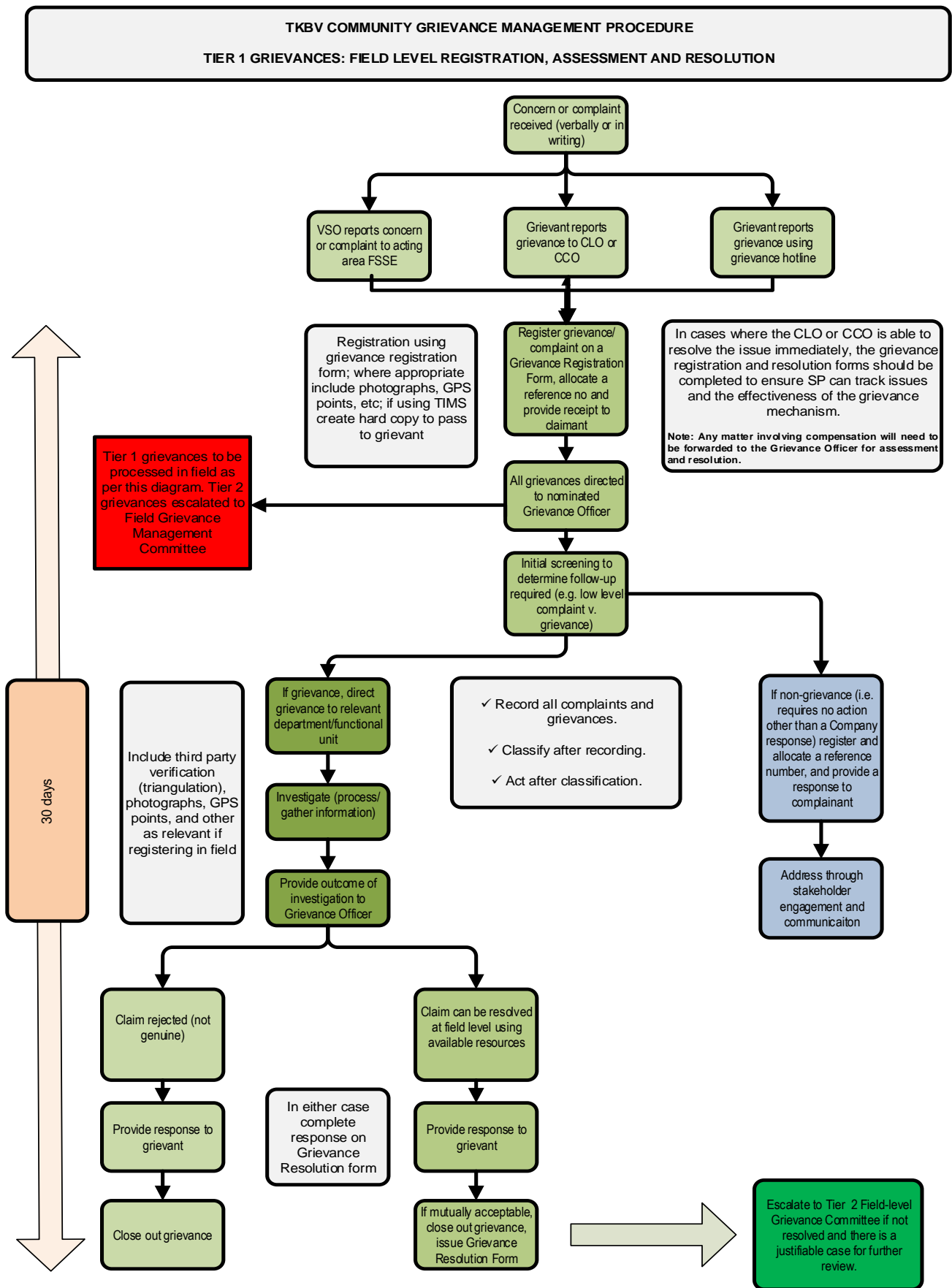


Figure 2: TKBV Community Grievance Management Procedure

The Grievance Mechanism seeks to:

- Provide an equitable and context-specific process which respects the confidentiality of all parties, protects all parties from retaliation and builds trust as an integral component of broader community relations activities;
- Provide a predictable, accessible, transparent, and legitimate process to all parties, resulting in outcomes that are seen as fair, rights compatible effective, and lasting; and
- Enable more systematic identification of emerging issues and trends, facilitating corrective action and proactive engagement.

The procedure governs how TKBV will receive grievances pertaining to project activities. It will capture grievances arising from actual project impacts, as well as issues that are simply perceived to be related to TKBV, irrespective of whether they derive directly from TKBV or contractor activities.

Grievances shall be investigated and resolved through a defined series of steps as outlined in this procedure. This process allows for three stages of resolution. Specifically: Tier 1 (Entry level) procedures define the means through which community-level grievances may be (i) received, acknowledged and registered by the Project; and (ii) how field-level investigation and resolution of grievances will occur. Tier 2 procedures allows for unresolved grievances to be escalated for further review at the field level. Tier 3 grievance management, which allows for the grievant to proceed to court in the event that the grievance cannot be resolved to the satisfaction of the grievant and the Project, will remain outside the scope of this procedure.

8.2 Definitions

In addition to the definitions provided directly below the contents page of this document, additional definitions are provided in management of grievances.

- **Concerns/Issues:** Questions, requests for information, or general perceptions not necessarily related to a specific impact or incident caused by project activity. If not addressed, concerns and issues can become grievances. Concerns/issues will be recorded as part of the grievance mechanism and resolution procedure but will not be processed as a grievance.
- **Grievance/complaint:** This procedure will utilise the terms 'grievance' and 'complaint' interchangeably. Typically grievances are related to a specific and identifiable impact caused by a project activity, which is raised by an affected individual, family, group or community of stakeholders with the intent of bringing the impact to the attention of TKBV or contractor seeking that the impact be mitigated (e.g. dust, noise or vibration). More specific grievances raised by an individual, family, group or community of stakeholders who claim to be affected by real or perceived impacts of a company's operations will require specific, targeted corrective actions, which may include compensation. These complaints will be handled by the TKBV Grievance Officer.
- **Grievance Mechanism Tiers:**
 - Entry Level (First Tier) refers to a process through which a grievance is received, acknowledged and registered and subsequently may be investigated and resolved directly between the grievant and the Project through a process of direct or mediated dialogue either by the Grievance Officer (in collaboration with the relevant department) or by site management; and
 - Second Tier refers to the process that needs to be followed when an Entry Level (Tier 1) grievance cannot be resolved directly between the grievant and the Project (i.e. at the Tier 1 level) and is thus escalated to Tier 2, involving adjudication by a TKBV Field Operations Grievance Committee, which may include appropriate external representation as required. The need to involve appropriate third party representation will be determined in line with the nature of the grievance, and in collaboration with field operational managers and the community to ensure transparency and adequate

independence. Should the Tier 2 dispute resolution process fail to satisfy the grievant and close the grievance, the complainant can access judicial channels to try and gain resolution.³

9.0 MONITORING, EVALUATION AND REPORTING

Recording, monitoring, evaluating, and reporting upon TKBV Kenya's FSD ESIA Stakeholder Engagement program are critical for ensuring that stakeholder engagement activities do not simply occur in isolation, but that they support business objectives and occur in an on-going coordinated manner across and between functions with responsibility for stakeholder engagement.

The objectives of TKBV's recording, monitoring, evaluation and reporting efforts are to:

- Record stakeholder engagement efforts and identify potential impacts and risks;
- Assess risks and impacts and their consequences on project-affected peoples;
- Consult on new impacts and risks that are identified during the planning and assessment process;
- Provide input into proposed mitigation measures, as well as the opportunities for sharing of community benefits;
- Ensure compliance with Project commitments that have been made;
- Verify the effectiveness of the resolution of community grievances relating to TKBV operations; and
- Manage and track the degree to which TKBV has been able to gain social acceptance.

The monitoring, evaluation and reporting of stakeholder engagement will build upon the issue identification done during the scoping consultation. Stakeholder issues and questions collected during other phases will be summarised to highlight the most common topics among consulted groups.

The results of baseline studies will be presented in the draft ESIA. All issues will be shared among the ESIA specialists to ensure that stakeholder questions are considered in the development of impact analysis and mitigation. The goal of this internal process is to ensure that questions about impact management are sufficiently understood and addressed.

A summary of the draft ESIA and associated management plans will be used to solicit another round of comments during the disclosure of the draft ESIA results. Stakeholder issues collected during previous phases will be important in generating non-technical summary documents. These simplified versions of the full ESIA will seek to answer all key issues and questions in language that is understandable for all stakeholders.

Finally, a summary of all stakeholder issues will be included in the final ESIA report. This final report will highlight any critical questions or areas of disagreement identified during the disclosure and discussions around impact analysis and mitigation.

³ The process of going through the formal judicial channels of the host country (or other applicable judicial or non-judicial systems outside of the host country) will be referred to as the 'Third Tier' of community grievance resolution; however, for the purpose of this document it is considered to be outside the scope of the non-judicial community grievance mechanism. It is the responsibility of TKBV staff members and the Grievance Officer to alert grievants to this potential avenue of redress should they not be satisfied by the Tier 2 resolution process.

Signature Page

Golder Associates (UK) Ltd



Kevin Arbizu
ESIA Practitioner



Andrew Morsley
Associate/ESIA Project Manager

KA/AM/es

Date: 10 September 2019

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APPENDIX A

**Background Information
Document**

SOUTH LOKICHAR FOUNDATION STAGE PROJECT

Background Information Document

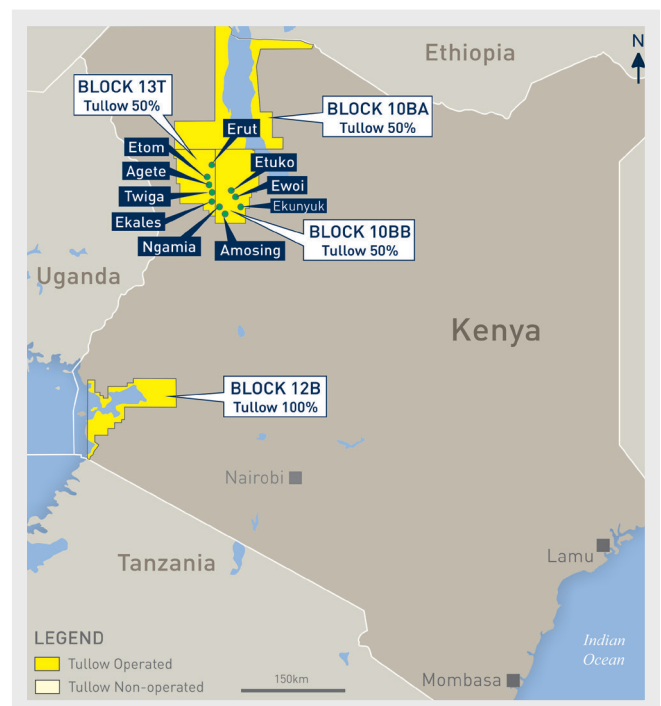
EXPLORATION & APPRAISAL SUCCESS

In 2012, the Ngamia-1 exploration well in the South Lokichar Basin in Turkana, northern Kenya, successfully encountered over 200 metres of net oil pay. As a result, a significant drilling programme began with further exploration success in the South Lokichar Basin at the Amosing, Twiga, Etuko, Ekales, Agete, Ewoi, Ekunyuk, Etom, Erut and Emekuya oil accumulations.

A total of 40 exploration and appraisal wells have now been drilled in the basin and the Joint Venture Partnership (Tullow Oil, Africa Oil, Total and the Government of Kenya) has conducted extended well tests, water injection tests, well interference tests and water-flood trials, all of which have proved invaluable for planning the development and commercialisation of the oil fields.

DEVELOPMENT PLANNING

Following a full assessment of all the exploration and appraisal data, it is estimated that the South Lokichar Basin contains at least 560 million barrels of oil (mmbbl) that can be recovered, but with the potential to produce more. Project Oil Kenya's Joint Venture Partners have proposed to the Government of Kenya that the Amosing, Twiga and Ngamia fields should be developed as the Foundation Stage of the South Lokichar development. This approach brings significant benefits as it enables an early Final Investment Decision (FID) taking full advantage of the current low-cost environment for both the field and infrastructure development and provides the best opportunity to deliver First Oil in a timeline that meets the Government of Kenya expectations. The installed infrastructure from this initial phase can then be utilised for the optimisation of the remaining South Lokichar oil fields, allowing the incremental development of these fields to be completed at a lower cost post-First Oil. The incremental development of the remaining recoverable oil and the upside potential is expected to increase plateau production to 100,000 barrels of oil per day (bopd) or greater.



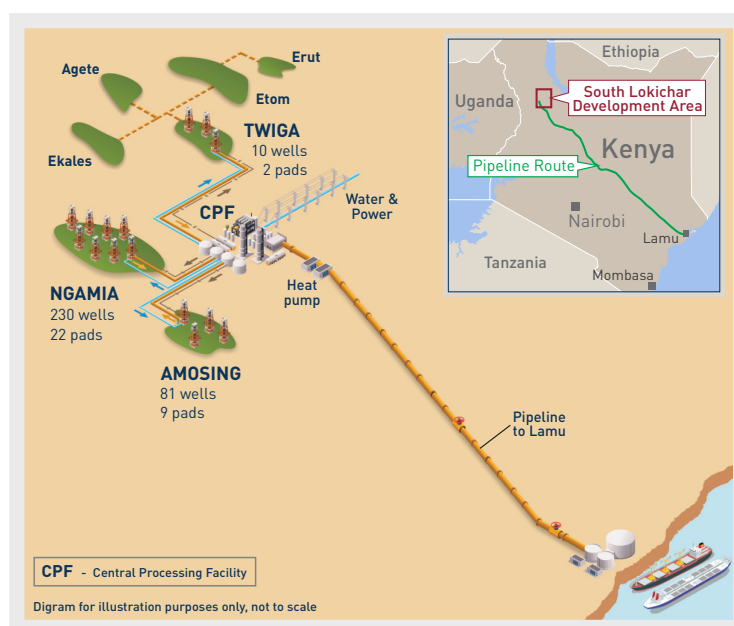
FOUNDATION STAGE PROJECT

The Foundation Stage Project is currently planned to develop an initial 230 wells through 22 well pads at Ngamia, 81 wells through 9 well pads at Amosing, and 10 wells through 2 pads at Twiga. This stage will target production of approximately 226 mmbopd, and a plateau rate of 60,000 to 80,000 bopd. Once the crude oil has been processed and stabilised it will be transported via a buried export pipeline to Lamu, for onward sale to the international market.

The Front-End Engineering and Design (FEED) work, and Environmental and Social Impact Assessments (ESIA) for the Foundation Stage Project are ongoing. FID is targeted in 2H 2020 and First Oil production approximately 36 months after FID. Total gross capex associated with the Foundation Stage upstream infrastructure and oil export pipeline is expected to be around \$3 billion.

The key components of the South Lokichar Foundation Stage Project include the construction of the following infrastructure:

- New well pads in different fields within the South Lokichar Basin and well drilling activities;
- Buried interconnecting flowlines to transport oil;
- A water pipeline from Turkwel dam;
- Construction of a Central Processing Facility (CPF);
- Construction and use of new access roads; and
- Support facilities and infrastructure, including construction camps, laydown areas and waste management infrastructure.



LAND

In the Land Access Framework Agreement (LARF), it is stated that access to land for the Project will range from temporary occupation, permanent occupation and rights of way. Land will be required within three main fields Twiga, Amosing and Ngamia. The total area of the perimeter of the three fields is approximately 6500 hectares. However, permanent access will only be required for discrete pieces of land for infrastructure such as well pads, CPF and flow lines. Currently the Joint Venture Partners are finalising the exact location and size of the footprint through the Front-End Engineering Design (FEED) process.

In February 2019, The National Land Commission gazzetted the intention to acquire land within the perimeter of the fields and once the final footprint of the surface infrastructure is defined, the information on the land size and geographic location of the land required will be communicated to Turkana County Government, and the affected communities.

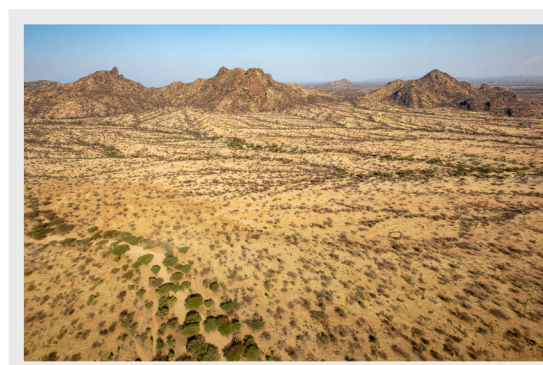
The current schedule targets securing access to land by the end of 2019.

Initial engagement among key national stakeholders started in August 2018 and will continue throughout the entire process.

Land acquisition for petroleum activities is a process through which land is acquired on behalf of the Ministry of Mining and Petroleum for Project Oil Kenya by the National Land Commission (NLC) in partnership with Turkana County Government (TCG). The land shall at all time belong to the Government of Kenya.

A Resettlement Action Plan (RAP) specifies the procedures that will be followed in land acquisition and the actions that will be taken to mitigate the effects, compensate for losses and provide development benefits to persons and communities affected by the project. As part of the RAP, displaced people will be assisted by the project in their efforts to improve their livelihoods and standard of living or at least to restore them to pre-displacement levels, providing sufficient investment resources to give the persons displaced by the project the opportunity to share in the project benefits.

The specific details of the livelihood programmes will be made available once the baseline information from each project specific RAP has been collected and the programmes have been designed to address the resettlement plans.



WATER

Water is required for construction and oil production operations. Exact volumes of water required is still being evaluated.

A multi-criteria decision analysis technique was applied to compare seven options identified as potential water sources. The following criteria were used to identify the optimum solution: technical feasibility; regulatory approvals; stakeholder acceptability; social and environmental impact; security (asset protection); and cost. Using this technique, other options were eliminated leaving four options; Turkwel Dam, Lake Turkana, local groundwater and distant groundwater and further technical studies on hydrogeology and hydrology were conducted. Turkwel Dam is considered the most appropriate water source for the project.

The design of the water pipeline will include the provision of water supply for communities living along the pipeline route, through off-takes at various points in the pipeline. Those water points will be managed by the respective County governments, who will take responsibility for the water service provision.

A Water Delivery taskforce (Turkwel Dam Integrated Development Project), was set up In July 2018 with clear Terms of Reference (ToR), led by National Government (PS level) but with representation from Turkana and West Pokot (Governor level), the taskforce is to spearhead stakeholder engagements.

SHARED PROSPERITY AND LOCAL CONTENT

Sustainability is one of Tullow's 2030 Vision core pillars and one of the ways that it is achieved is through Shared Prosperity which is delivered through three focus areas namely: Local Content & supplier capacity; Developing local skills; and Socio-economic investments. Project Oil Kenya is committed to enabling Kenyans to benefit through jobs, and the supply of goods and services. It will achieve this by working closely with both national and county governments, as well as development partners, the local businesses including those at the county level and learning institutions.

The Foundation Stage Development will follow these Local Content Principles:

- Create a lasting legacy for Project Oil Kenya. It includes employment creation, skills development, local contracting and knowledge transfer.
- Initiatives will be planned over the Project Life Cycle and will be geared towards developing sustainable benefits.
- Successful project delivery requires a balance between cost, schedule, quality and Local Content.
- Delivery of Local Content is a shared responsibility by everyone in the business.
- Contractors and sub-contractors will share Project Oil Kenya's Local Content principles and will play a key role in delivering the Project's Local Content plan.



ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA)

The ESIA is a process and management technique that allows consideration of the likely environmental and social impacts of a development prior to it proceeding. This provides an opportunity to ensure that the design is optimised in an integrated manner, minimising negative environmental and social impacts and maximising positive impacts.

The ESIA is being conducted by Golder Associates (UK) Limited and Kenyan, NEMA registered, partners. Although the ESIA is commissioned by Tullow the ESIA contractors are independent with a remit to provide unbiased data and assessments. The ESIA process is being implemented with the goal of maximising Kenyan knowledge and expertise.

In accordance with Kenyan regulation and international standards, all risks and impacts (positive and negative) identified will be analysed with a consideration of recent environmental and social baseline data. Key topics of the baseline include:

- Socio-economics;
- Land tenure and use;
- Community health and safety;
- Cultural heritage;
- Biodiversity;
- Ecosystem services;
- Soil;
- Geology and seismicity;
- Water;
- Air quality and climate;
- Noise and vibration; and
- Landscape and visual.



The ESIA for the Foundation Stage Project differs from earlier impact assessments conducted by Tullow. Previously ESIA permitting has been for short-term impacts (e.g. seismic lines, exploration drilling or the Early Oil Pilot Scheme). The ESIA being conducted now is for the much longer production phase and requires much more comprehensive data gathering and analysis.

As a first priority, the ESIA must consider applicable Kenyan legislation. In addition to this, the Project will meet the International Finance Corporation (IFC) Environmental & Social Sustainability Performance Standards. These international standards are a framework for the future management of all environmental and social performance.

There are three main stages in the ESIA process

- | | | |
|--------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------------|
| 1 Scoping Phase
(completed March 2016) | 2 Baseline Studies
(through 2016-2019) and; | 3 Impact analysis and mitigation
(Currently ongoing) |
|--------------------------------------------------|-------------------------------------------------------|----------------------------------------------------------------|

Stage 3 includes the development of Environmental and Social Management Plans (ESMP), which includes all commitments to address Project impacts.

The National Environmental Management Authority (NEMA) has accepted the Terms of Reference for the ESIA, which outlines the work plan for the next phases of the project. Once finalised the ESIA will be submitted to NEMA for approval. No construction activities for the Foundation Stage Project will start until approval is received.

STAKEHOLDER ENGAGEMENT

The objective of stakeholder engagement is to establish and maintain constructive relationships with external stakeholders over the life of Tullow's operations. The Joint Venture Partners commit to identifying and assessing all stakeholders affected by planned activities, based on the Project's potential risks and adverse impacts. Stakeholders will be provided with access to timely, relevant, understandable and accessible information, and how project impacted people will be provided with an opportunity to discuss and have input into project design, scope, impacts and mitigation measures prior to the start of project activities.

The stakeholder engagement process for the ESIA will be outlined in a publicly available ESIA Stakeholder Engagement Plan (SEP). The overall objective of the SEP is to explain how the Project will engage with stakeholders throughout the course of the Project. As part of the ESIA, stakeholder engagement will capture issues, comments and questions accurately and in a meaningful manner.



GRIEVANCE MECHANISM

The Tullow Grievance Mechanism aims to ensure that individuals, families, groups, communities and other stakeholders within the project affected area are able to raise concerns, complaints or grievances; and that the company is able to effectively acknowledge, record, review and formally respond to grievances before they escalate into serious disputes. It also aims at strengthening mutual constructive long-term relationships with the communities and stakeholders. The Grievance Mechanism is free to use and is promoted widely in the Project area.

CONTACT INFORMATION

For more information on the Project or ESIA, residents in the Project area may visit Tullow Community Resource Officers in Turkana or use the contact numbers/emails below:

Lodwar Tullow Community Resource Centre

Nawoitong Road
Opposite County Government Headquarters
Tel: +254 715 594829

Lokichar Tullow Community Resource Centre

Lokichar Kitale Road
Next to Toyota Kenya Lokichar
Tel: +254 715 594 212

Nakukulas Tullow Community Resource Centre

Ngamia Nakukulas Road
After Ngamia Secondary School
Tel: +254 798 418 445

Lokori Tullow Community Resource Centre

Lokori Kapendo Road
Before Lokori Mixed Primary School
Tel: + 254 727 129 425

Email: Kenya.fieldcommunications@tulloiloil.com

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