



KEY FACTS ABOUT THE AMU COAL POWER PLANT'S ECONOMIC AND ENVIRONMENTAL ASPECTS

1. The Climate Change Act 2016 requires Kenya to promote low carbon technologies, improve efficiency and reduce emissions intensity by facilitating approaches and uptake of technologies that support low carbon and climate resilient development.
2. The National Climate Change Action Plan requires Kenya to transition to a low carbon climate resilient development pathway to address vulnerability to climate risks.
3. The EIA Report for the #LamuCoalProject fails to adhere to and is not compliant with the Physical Planning Act as it does not have the change of user component which is a requirement under the law.
4. Part 8 of the Agriculture Act of 2012 addresses the disposition of the owners and occupiers of agricultural land. The EIA Report makes no mention of the processes and procedures of how this is to be done.
5. Heavy investment in thermal sources of energy such as coal and natural gas will result in expensive electricity that could increase the unit cost of power by Sh6.03 per kilowatt hour – making Kenya one of the most expensive places to do business.
6. Kenya lacks the capacity to absorb such massive amounts of electricity given the sluggish rate of economic growth, and a poorly performing manufacturing sector.
7. The power plant may remain redundant for several years, attracting unnecessary tariffs for idle capacity when the country's national debt is becoming unsustainable. Kenya's debt repayment costs have officially surpassed development expenditure.
8. With nearly 1,300 MW of clean and cheaper energy set to come into the grid because of the Turkana Wind Farm Project and the Olkaria III Project, the inclusion of thermal power in the planned generation mix lacks a justification.
9. Kenya's debt payments for the year to June 2016 was eight times more than what Treasury used for roads, underlining the burden of increased government borrowing.
10. Treasury data shows that Kenya paid Sh421.8 billion for loans in the year to June compared to a combined development spend of Sh333 billion in the period and eight times that of infrastructure like roads that stood at Sh55 billion.
11. Kenya under the 2016 – 2017 budget has earmarked to spend \$4.66 billion on public debt repayments in the financial year starting June. This effectively locks 20 per cent of budget expenditure into debt repayment. This will greatly impact lower inflation and interest rate regimes.

THE AIR QUALITY STUDY

12. Responsibility for Monitoring Air Quality - The EIA Report fails to give specification on which institution will develop and monitor the Air Quality Monitoring and Management Plan.
13. There is no clear management plan for emissions in the Environmental Management Plan. There is no clear outline on management of SO_x, NO_x and PM. The Report only relies on the fact that the emissions produced will be below the annual average limits prescribed in the Air Quality Regulations.
14. The critical information on distance from the residential and the project sites is missing in the EIA Report. These distances will be important to determine the health hazards associated with air quality and noise pollution.
15. The Air Quality Report does not give the number of moveable vehicles anticipated even during the construction phase. This is useful in planning for the impacts and consequent mitigation measures.
16. Storage and Use of Ash: The EIA Report has not indicated on the storage of ash. This is important as ash will cause air pollution through springing water as indicated in the report. Further, planting of vegetation is not enough as there will still be seepage on the ground resulting to pollution.
17. Particulate Matter Measurements: The study only conducted four hours of assumed exposure measurement as compared to a 24 hour cycle exposure.

THE NOISE QUALITY STUDY

18. The noise emission data presented did not use the latest technology in measuring plant noise emission control. The latest technology on noise measurement should be deployed in the analysis.
19. Noise Threshold Classification: The EIA Report classifies noise level as background noise whenever it is temporary and transient. The classifications of noise level must specific and not vague.
20. Baseline Noise Survey: The baseline noise survey only covers a radius of 1.5km. The extended area that can further be affected is just approximated with no accuracy. There should be actual accuracy of the area to be affected without approximation.
21. Noise Sensitive Receptor: The noise sensitive receptor (NSR) only includes 11 locations in the baseline survey. More locations should be identified considering the vast area that the project will cover and the impact expected.
22. Noise Assessment: The noise assessment conducted was based on assumed impact durations. The precise detail of construction schedules or equipment requirements was not finalized. There is need for accuracy since impact durations informs the measurement and levels of pollution for effective inference.

23. USE OF GOOGLE MAPS TO IDENTIFY LOCATIONS: There is express admission that due to the huge scale of the construction site, it was impossible to identify exact locations from which noise level assessment and measurements could be done. Google map was thus used. The ASSESSMENT WAS BASED ON GENERAL CONTOUR AND CONJECTURE. Since the use of Google map assumed that the area was homogenous. (This could be done from a desktop study in Nairobi)
24. Construction Worker Camp Locations: The construction worker camp locations are not known. The projections, however, reveal that negative impacts will definitely be experienced especially during the day. The conjecture that there will be no impact due to involvement in the construction activity is flawed. Those who will not be involved in the active construction have not been considered and there is no justification of how those actively involved will be protected from the noise pollution.
25. Mitigation Measures: The mitigation measures that have been listed are vague and only ambitious. They do not address the real issues and provide solution as to how the noise will be reduced and impact minimized. It is merely listing alternatives. This creates room for escape from liability.
26. Meteorological Ground Conditions: It is evident that meteorological ground conditions are greatly affected and influenced by wind, temperature and other factors. This affects the mitigation measures listed in the EIA Report. Other alternative mitigation measures that are reliable should be adopted since wind currents and temperature changes are natural phenomenon.

THE CLIMATE CHANGE AND GREENHOUSE GAS EMISSIONS STUDY

27. Scope of Climate Change Study is Limited: The scope of the climate change study is limited as it only focuses on emissions without considerations of other effects such as food security.
28. Land Use Change: The potential impact of the change of land use to the flora and fauna is a clear and present danger that has not been addressed in the study. These could even include the danger of becoming extinct.
29. Climate Risk Assessment Scope: The Climate Risk Assessment has no focused risk management plan. No attention has been given to a rehabilitation strategy as a long term mitigation measure.
30. Inadequate Description of Impacts: There is lack of data on the number of trees that will be felled to clear space and the impact it will cause on the environment and livelihood.
31. Flood Mitigation Plan: The study has no flood mitigation plan and makes a wrong assumption by alleging that there is no possibility of flooding since there is no river nearby. The fact that the area is generally flat is a good precaution to plan for it.
32. Disaster Risk Assessment and Management: The new constructions can also bring along flooding. A good example is the Standard Gauge Railway in Maungu where waterways were obstructed by the railway bridges and this caused flooding.