ABRREVIATED RESETTLEMENT ACTION PLAN (ARAP)

FOR THE

MALKERNS STEEL MONOPOLE PROJECT

August 2026

Rv_1

Table of Contents

EXECUTIVE SUMMARY 8

1. PROJECT DESCRIPTION 9

1.1 PROJECT OBJECTIVES 9
1.2 LAND REQUIREMENTS AND JUSTIFICATION 9
1.3 PROJECT LOCATION 10
1.4 MEASURES TAKEN TO MINIMIZE DISPLACEMENT 10

2. THE ABBREVIATED RESETTLEMENT ACTION PLAN 11

2.1 RATIONALE FOR THE PREPARATION OF THE ARAP 11
2.2 SCOPE OF THE ARAP 11
2.3 POLICY AND PRINCIPLES 12

3. LEGAL AND REGULATORY FRAMEWORK 14

3.1 NATIONAL LAWS 14
3.1.1 The Constitution of the Kingdom of Eswatini, 2005 14
3.1.2 Electricity Act, 2007 14
3.1.3 The Acquisition of Property Act, 1961 14
3.1.4 Land Survey Act, 1961 and Regulations 15
3.1.5 The Concession Partition Act of 1907 15
3.1.6 National Land Policy 15
3.1.7 World Bank Environmental and Social Standards 15
3.1.8 Gap Analysis 16

4. ANALYSIS OF SOCIO-ECONOMIC IMPACTS AND LOSSES 18

4.1 GENERAL SOCIAL IMPACT ASSESSMENT OF AFFECTED PEOPLE 18
4.2 INVENTORY AND IDENTIFICATION OF AFFECTED ASSETS 19
4.3 VALUATION PRINCIPLES 19
4.4 ANALYSIS OF LOSSES 19

5. ELIGIBILITY AND ENTITLEMENT FRAMEWORK 22

5.1 ELIGIBILITY FRAMEWORK 22
5.2 ENTITLEMENT MATRIX FOR PAPS 22
5.2.1 Allowances 24
5.2.2 Livelihood Restoration 24

5.2.3 Vulnerable People 25
5.3 CUT-OFF DATE 25

6. GRIEVANCE REDRESS MECHANISM (GRM) 26

6.1 NOTICE OF THE GRIEVANCE 26
6.2 GRIEVANCE SUBMISSION 26
6.3 GRIEVANCE REGISTRATION 27
6.4 GRIEVANCE ESCALATION 27
6.5 GRIEVANCE MANAGEMENT RESPONSIBILITIES 27
6.6 MONITORING AND REPORTING 28
6.7 CLOSURE AND APPEALS 28

7. BUDGET AND FINANCI PLAN 29

8. INSTITUTIONAL ARRANGEMENTS – ROLES AND RESPONSIBILITIES 30

8.1 ROLES AND RESPONSIBILITIES 30
8.1.1 Operations 30
8.1.2 Resettlement Implementation Team (RIT) 30
8.1.3 Social Standards Office 31

9. TIMETABLE OF EVENTS 32

9.1 IMPLEMENTATION SCHEDULE OF THE ARAP 32

10. MONITORING AND EVALUATION 33

10.1 PERFORMANCE MONITORING 33
10.2 EFFECTS MONITORING 33
10.3 COMPLETION AUDIT 33

11. STAKEHOLDERS CONSULTATION 34

11.1 INTRODUCTION 34
11.2 PAST ENGAGEMENTS 34
11.3 METHODS OF ENGAGEMENTS 34
11.3.1 Individual Engagements 34
12.3.2 Public Meetings 34
12.3.3 Choice and Right 35

List of Figures

Figure 1: Steel Monopole Line Traversing on an Existing Servitude 10
Figure 2: Compensation Distribution and Proportions 20
Figure 3:Number of Affected Fruit Trees 21
Figure 4: Distribution of Affected Land Area 21

List of Tables

Table 1:National and International Good Practice Gap Analysis 16
Table 2: Types of Losses on Liner Infrastructure ....**Error! Bookmark not defined.**
Table 3:Entitlement Matrix Framework 23
Table 4: ARAP Budget 29
Table 5:Timeframe and Schedule of Activities for the Implementation of the ARAP 32
Table 6: List of Forma1 Engagements and Engagement Dates 34

DEFINITIONS

Terms	Definitions
Census	A field survey usually carried out to identify and determine the number of Project Affected Persons (PAPs), their assets, and potential impacts. The census is carried out in accordance with the procedures, satisfactory to the relevant government authorities, and the World Bank Environmental and Social Framework. The meaning of the word shall also embrace the criteria for eligibility for compensation, resettlement and other measures emanating from consultations with affected communities and local leaders.
Compensation	The payment in kind, cash or other assets given in exchange for the taking of land, or loss of other assets, including fixed assets thereon, in part or whole.
Cut-off date	The date of commencement of the census of PAPs within the project area boundaries. This is the date on and beyond which any person whose land is occupied for project use will not be eligible for compensation.
Economic Displacement	Loss of land, assets or access to assets leading to loss of income sources or other means of livelihood.
Eligibility	The criteria for qualifications to receive resettlement benefits.
Entitlement	Resettlement entitlements are the sum of compensation provided to persons in their respective eligibility category. The entitlement may comprise cash or in-

	kind compensation, relocation costs, income rehabilitation assistance, transfer assistance, income substitution and relocation.
Grievance	An issue, concern, problem or claim (perceived or actual) that an individual or community group wants the Eswatini Electric Company to address and resolve.
Grievance Redress Mechanism	A locally accessible, formalized way to accept, assess and resolve feedback or complaints from individuals or communities who believe they are adversely impacted by the Project.
Land	Land, including anything growing on or permanently affixed to land, such as crops, buildings and other improvements.
Land Acquisition	Methods of obtaining land for project purposes, which may include outright purchase, expropriation of property and acquisition of access rights, such as servitudes or right of way. Land acquisition may also include: • acquisition of unoccupied or unused land whether the landholder relies upon such land for income or livelihood purposes; • repossession of public land that is used or occupied by individuals or households; and • project impacts that result in land being submerged or otherwise rendered unusable or inaccessible.
Livelihood	The full range of means that individuals, families and communities utilize to make a living, such as wage-based income, agriculture, fishing, foraging, other natural resource-based livelihoods, petty trade and bartering.
Livelihood Restoration	Consists of entitlements for affected persons and/or communities who are economically displaced, providing them with adequate opportunity and resources to at least restore, if not improve, their livelihoods.
Physical Displacement	Relocation, loss of residential land or loss of shelter.
Project Affected Households	A family or collection of PAPs forming a nuclear or extended family that coexists or lives within the same house or compound.
Project Affected Persons	People who, because of Project activities relating to the involuntary taking or voluntary contribution of their land and other assets, experience direct economic and/or social adverse impacts, regardless of whether they are required to physically relocate. These PAPs may have their: • standard of living adversely affected, whether or not the PAP must move to another location; • right, title, interest in any house, land or any other fixed or movable asset acquired or possessed, temporarily or permanently, adversely affected;

	• access to productive assets adversely affected, temporarily or permanently; and • business, occupation, work or place of residence or habitat adversely affected.
Replacement Cost	Method of valuation yielding compensation sufficient to replace assets, plus necessary transaction costs associated with asset replacement. In terms of land, this may be categorized as follows: • Replacement cost for agricultural land means the pre-project or pre-displacement (whichever is higher) value of land of equal productive potential or use located in the vicinity of the affected land, plus the costs of preparing the land to levels similar to those of the affected land, including any registration, transfer taxes and other associated fees. • Replacement cost for houses and other structures means the prevailing cost of replacing affected structures of the quality like, or better than, that of the affected structures. Such costs shall include building materials, transporting building materials to site, any labor and contractors' fees, and any registration costs
Resettlement Action Plan (RAP)	A resettlement instrument to be prepared when subproject locations are identified. In such cases, land acquisition leads to physical displacement of people, and/or loss of shelter, and/or loss of livelihoods, and/or loss, denial or restriction of access to economic resources. RAPs are prepared by the party impacting on PAPs and their livelihoods. RAPs contain specific and legally binding requirements to be abided by to resettle and compensate the affected party/ies before implementation of the project activities causing adverse impacts.
Restriction on Land Use	Limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the Project. These may include restrictions on access to common property resources, and restrictions on land use within servitudes or safety zones
Stakeholder Engagement	Broad, inclusive and continuous process between the project proponent and those potentially affected by the Project that usually spans the life of the Project. It includes broad participation and input to project design and procedures, including consultations, information disclosure and dissemination

EEA: Eswatini Environment Authority

EEC: Eswatini Electricity Company

ESERA: Eswatini Energy Regulatory Authority

ESS 5: World Bank's Environmental and Social Standard 5

GRM: Grievance Redress Mechanism

kV: Kilovolt

MNRE: Ministry of Natural Resources and Energy

PAP: Project Affected Person

PIU: Project Implementation Unit

ARAP: Abbreviated Resettlement Action Plan

RPF: Resettlement Policy Framework

TDL: Title Deed Land

WB: World Bank

RIT: RAP Implementation Team

EXECUTIVE SUMMARY

The Eswatini Electricity Company (EEC) prepared this Abbreviated Resettlement Action Plan (ARAP) for the Malkerns Steel Monopoles Upgrade Project, which rehabilitated approximately 8 km of the existing 11kV Feeder 1003 line from Malkerns Substation to Nyandza. The project replaced aging wooden poles with steel monopoles within an existing servitude to improve electricity reliability, safety and network resilience for agricultural and commercial users.

The project did not result in physical relocation or loss of residential structures. Impacts were limited to economic displacement, mainly crop losses, fruit tree losses, temporary disturbance, land rehabilitation needs and permanent land-use restrictions within the servitude. Five Project Affected Persons were identified, and the affected assets were verified through stakeholder engagement, field inspections and a professional valuation undertaken by Springfields Property Consultants.

The total PAP compensation budget is SZL **321,787.77**, with an overall ARAP budget of SZL **415,742.77** including valuation services. Crop losses represent the largest share of compensation, followed by permanent land-use restrictions, fruit trees, land rehabilitation and inconvenience allowances. Compensation and livelihood restoration measures are based on national legislation and World Bank ESS5 principles, including replacement cost, meaningful consultation, timely disclosure, grievance redress and monitoring.

Implementation will be managed by EEC through the Resettlement Implementation Team, supported by the Social Standards Office and Malkerns Depot. Key activities include ARAP disclosure, compensation agreement signing, payment of compensation, land rehabilitation, grievance management, livelihood restoration follow-up and completion monitoring to confirm that affected persons are not left worse off because of the project

1. PROJECT DESCRIPTION

The Malkerns Steel Monopoles Upgrade Project was undertaken by the EEC to rehabilitate approximately 8 kilometres of the existing 11kV Feeder 1003 distribution line from Malkerns Substation to Nyandza. The project replaced deteriorated wooden poles with stronger steel monopoles within an existing electricity servitude on Title Deed Land, improving the reliability, safety and resilience of the electricity network serving a predominantly agricultural area.

The works included replacing approximately 80 wooden poles with 76 steel monopoles, installing a shield wire for lightning protection, re-stringing conductors, excavating foundations, accessing work sites, undertaking limited vegetation clearance and rehabilitating disturbed areas. Although the route followed an existing servitude, construction and permanent infrastructure caused localized crop losses, fruit-tree losses, temporary disturbance and restrictions on productive land use. No households, residential structures or permanent business structures were physically relocated.

1.1 Project Objectives

The project objectives were to improve the reliability and continuity of electricity supply along Feeder 1003; replace aging, storm- and termite-damaged wooden poles with durable steel monopoles; strengthen operational safety and network resilience; reduce outages, technical losses and maintenance requirements; and support agricultural and commercial customers who depend on reliable electricity for irrigation, processing and related activities.

1.2 Land Requirements and Justification

The project did not require the transfer of ownership of a new continuous corridor because the works were implemented within an existing electricity servitude. Land-related requirements were limited to temporary construction access and work areas, excavation and foundation footprints, monopole bases, stay wires, conductor-clearance requirements and the continued 20-metre servitude, extending 10 metres on either side of the centre line. These rights and restrictions were necessary to install, operate and safely maintain the upgraded line, provide secure access and adequate electrical clearances, protect public safety and improve electricity reliability.

The need for the works arose from deterioration of the existing wooden-pole network due to storms, decay, termites and weathering, which contributed to outages and increased maintenance demands. Although no new corridor was acquired, project activities caused temporary occupation, localized permanent land-use restrictions and losses of crops and trees. Where these impacts could not be avoided, the ARAP provides compensation at replacement cost and appropriate assistance to restore affected livelihoods.

1.3 Project Location

The project is in the Malkerns area of Eswatini and follows the existing Feeder 1003 route for approximately 8 kilometres between Malkerns Substation and Nyandza. The corridor crosses Title Deed Land used mainly for commercial agriculture, including sugarcane, maize and pineapple production. The project map presented below illustrates the feeder alignment and its location within the existing servitude corridor.

Figure 1: Steel Monopole Line Traversing on an Existing Servitude

1.4 Measures Taken to Minimize Displacement

Displacement was minimized by retaining the existing feeder alignment and servitude, avoiding the creation of a new corridor, carefully positioning monopoles to reduce interference with productive land, limiting temporary access and vegetation clearance to the smallest practical footprint, and restoring disturbed soils and work areas after construction. The use of durable steel monopoles also reduces the frequency of future pole replacement. These measures avoided physical relocation and confined project impacts mainly to localized economic displacement.

2. THE ABBREVIATED RESETTLEMENT ACTION PLAN

The overall objective of this ARAP is to ensure that all Project Affected Persons are identified, consulted, compensated, and supported in a transparent and equitable manner. Specifically, the ARAP aims to document project impacts; establish eligibility and entitlement criteria; provide compensation at full replacement cost for eligible losses; support livelihood restoration where economic displacement has occurred; ensure meaningful stakeholder engagement and disclosure; provide an accessible grievance mechanism; and define implementation, institutional responsibility, monitoring, and reporting arrangements.

2.1 Rationale for the Preparation of the ARAP

The need for this ARAP arises from the socio-economic impacts associated with construction and operation of the upgraded 11kV line. Although the project was implemented within an existing electricity servitude, the line required a clearance corridor extending 10 metres on either side of the centre line. Within this corridor, structures, trading facilities, and trees are restricted to ensure safe construction, operation, maintenance, and access.

These restrictions and construction activities affected crops, fruit trees, access to productive land, and agricultural activities within the project corridor. EEC sought to implement the works while minimizing adverse effects on people living, farming, or holding rights along the line route. Where impacts on assets and livelihoods could not be avoided, affected persons are entitled to compensation at full replacement cost and appropriate livelihood restoration support.

2.2 Scope of the ARAP

The scope of this ARAP is limited to the economic displacement and related socio-economic impacts caused by the Malkerns Steel Monopoles Upgrade Project. It covers the following key elements:

a) Identification of project impacts and affected persons.

b) Review of the applicable legal, policy, and good-practice framework.

c) Eligibility criteria, entitlement principles, and compensation framework.

d) Livelihood restoration and assistance measures for affected persons.

e) Stakeholder engagement, consultation, and information disclosure arrangements.

f) Grievance management arrangements.

g) Institutional roles and responsibilities for implementation.

h) Implementation schedule and budget.

i) Monitoring, evaluation, and reporting framework.

2.3 Policy and Principles

The preparation and implementation of this ARAP are guided by the principles of avoidance, minimization, fair compensation, livelihood restoration, meaningful consultation, and transparent grievance management. Where land acquisition, restrictions on land use, or temporary disturbance could not be avoided, the project sought to minimize adverse impacts on affected persons and the environment using an existing servitude, careful siting of monopole structures, and measures to limit the construction footprint. The ARAP is aligned with the legal and regulatory framework of the Kingdom of Eswatini and is guided by the principles and requirements of the World Bank Environmental and Social Standard 5 (ESS5): Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, which serves as the benchmark for international good practice.

Consistent with ESS5, displacement may be physical or economic. Physical displacement involves relocation or loss of shelter, while economic displacement occurs where a project restricts access to land, productive assets, income sources, or means of livelihood without requiring physical relocation. In this project, the identified impacts are primarily economic in nature, arising from crop losses, fruit tree losses, land-use restrictions, and disturbance to agricultural activities within the project corridor.

The ARAP therefore applies to all affected persons whose assets, land use, or livelihoods were affected by the project, regardless of the severity of impact or the number of people affected. It recognizes affected persons with formal legal rights, those with recognizable claims to land or assets, and those without legal title whose assets or livelihoods were affected. Compensation and assistance will be provided in a manner that seeks to ensure that affected persons are not worse off because of the project and are supported to restore, or where possible improve, their livelihoods and living standards.

a) Avoid physical and economic displacement wherever feasible through project planning, siting, and design measures.

b) Minimize unavoidable impacts and compensate affected persons fully and fairly at replacement cost.

c) Restore, and where possible improve, the livelihoods and living standards of affected persons.

d) Consult affected persons meaningfully, disclose relevant information, and resolve grievances through an accessible and transparent process.

3. LEGAL AND REGULATORY FRAMEWORK

3.1 National Laws

National law concerning land rights and the right of the state to expropriate land are principal acts concerning land acquisition and resettlement in Eswatini. There are several supplementary laws that exist to guide the subdivision of land, transfer duties and surveys. For the purposes of this ARAP, the primary laws include the following;

3.1.1 The Constitution of the Kingdom of Eswatini, 2005

The Constitution is the supreme law of the Kingdom of Eswatini. Article 14 establishes the protection of fundamental human rights and specifically under Article 14 (d) guarantees the protection of the privacy of the home and other property rights of the individuals as well as the protection from deprivation of property without compensation. The fundamental rights to the protection of property and deprivation of such property are further defined in Article 19. Under this article, a person shall not be compulsory deprived of property or any interest in or right over property of any description unless the land is required for public use, the interest of defense, public safety, public order, public morality or public health. However, the compulsory acquisition of property may only be undertaken under law, which makes provision for prompt payment of fair compensation.

3.1.2 Electricity Act, 2007

The Electricity Act is the primary law that regulates the generation, distribution and supply of electricity in Eswatini. The right to establish statutory servitudes is granted to the EEC under section 55 of the Electricity Act of 2007. Servitude is a limited right to access and construct public infrastructure on property belonging to others by virtue of a statute. The statutory servitude does not require any form of land acquisition or transfer of ownership through the Deeds Office. As such no land acquisition is strictly required. The statutory servitude requires that an agreement specifying the rights obtained (i.e. perpetual right to construct and access infrastructure) is entered into between the EEC and landowners. However, fair and prior compensation must be provided for the restriction of access to the servitude and the loss of benefits accrued by the landowner from that land.

3.1.3 The Acquisition of Property Act, 1961

The Acquisition of Property Act allows the government (through the Ministry of Tinkhundla and Local Administration) to compulsory acquire any real property where it is required for public purposes. Public purpose includes any government-led construction financed through public funds, as well as any works required under the Eswatini Regulatory Authority. The Act grants powers to the State to undertake preliminary investigations on the target property (under Article 4) provided that any damage to the property is compensated. The property may only be acquired once formal notice is provided (under Article 5) and possession of the land may only occur not less than two months from the service of Article 5 notice. The amount of compensation to be provided for the compulsory acquisition of land shall be determined by a Board of Assessment (under Article 10). In determining the amount of compensation, the Board may appoint a sworn appraiser, as well as consider (1) the market value of the property, (2) any increase in value of the property, (3) any damages related to the severing of any land, (4) damages related to the impact of any other properties, or (5) any other reasonable expenses related to the change of residence.

3.1.4 Land Survey Act, 1961 and Regulations

The Land Survey Act and associated regulations establish the rules for the registration of surveyors and the survey of lands. The law restricts any person from practicing as a land surveyor unless they are registered under the law, and such practice will be undertaken in such a manner to ensure that it is accurate and correct.

3.1.5 The Concession Partition Act of 1907

Land administration legislation was established pre-independence and laid the foundation for a dual system of land law. The Concessions Partition Act of 1907 enabled land leased through concessions to be converted to individual freehold title, while Swazi National Land was specifically set apart and administered in terms of customary law by the monarch through the chieftaincy system.

3.1.6 National Land Policy

Eswatini began developing a National Land Policy in 1999 leading to a National Land Bill. However, the latter has not been promulgated at the time of the drafting of this ARAP. In the policy, the Eswatini government acknowledges the insecurity of all tenure types as an issue to be addressed through legislative reform. This resulted in the development of the Draft Land Bill which expressly repels 19 previous laws, the oldest dated 1904.

3.1.7 World Bank Environmental and Social Standards

The World Bank's policies in relation to land acquisition and involuntary resettlement are established under *ESS 5 – Land Acquisition, Restrictions on Land-Use, and Involuntary*

Resettlement. EES 5 directly applies to this Project because the Project involves the compulsory acquisition of land rights or the restriction of access to land in accordance with the legal system of the host country. Critical requirements is the recognition of PAPs with different land tenures. Displaced persons, under the ESS 5 include persons (1) who have formal legal rights to the land or assets they occupy or use; (2) who do not have formal legal rights to land or assets but have a claim to land that is recognized or recognizable under national law, or (3) who have no recognizable legal rights/claim to the land they occupy/use.

3.1.8 Gap Analysis

A gap analysis between ESS 5 and national legislation has been provided in Table 1 below overleaf. The table summarizes where the two regimes coverage and where they differ, it includes the measures that have been adopted in the ARAP to ensure alignment.

Table 1:National and International Good Practice Gap Analysis

No.	World Bank ESS	National Law Provisions	Gap Closure
1.	**Minimizing Resettlement:** Explore all viable alternative project designs to avoid or minimize displacement.	There is no explicit provision to reduce land acquisition or resettlement requirements. It may however be inferred under the Environmental Management Act, 2002 under avoid and mitigate principles.	The Project will need to demonstrate that it has considered measures to reduce land acquisition and resettlement impacts.
2.	**Forms of Land Acquisition:** ESS 5 applies to land acquired through (1) expropriation, (2) negotiated settlement where expropriation is available.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 require negotiated agreements to secure land. If this fails, only then is expropriation permitted.	No Gap.
3.	**Eligible Persons:** Persons eligible under ESS 5 include those with (1) legal rights, (2) recognized customary rights, (3) and who have no recognizable legal right or claim to the land or assets they occupy or use.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 only recognize *landowners recognized under statuary or customary law*. It is silent on those without recognizable legal right	ESS 5 is the most comprehensive definition and has been applied in this ARAP.
4.	**Fair Compensation:** The EEC will provide PAPs compensation at replacement cost. In-kind compensation should be considered *in lieu* of cash.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 make provision for cash compensation at market value. They do not consider full replacement value or in-kind replacement assets.	ESS 5 is the most comprehensive definition and has been applied in this ARAP. Cash compensation is calculated at full replacement value, while the option of replacement housing and land is given for instances where the property is no longer economically viable.

No.	World Bank ESS	National Law Provisions	Gap Closure
5.	**Livelihoods Restoration:** Economically displaced persons will be provided opportunities to improve, or at least restore, their means of income-earning capacity, production levels, and standards of living	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 are silent on livelihoods restoration.	ESS 5 is the most comprehensive definition and required additional support to PAPs to ensure that their livelihoods are restored to a similar state as prior to displacement and ideally improved.
6.	**Plans:** Where the Project results in resettlement, a Resettlement Instrument will be prepared consistent with ESS 5. In cases of only economic displacement, a Livelihood Restoration Plan will be prepared.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 do not require a specific resettlement plan. However, the latter Act does require surveys and valuations to be undertaken.	Asset inventories and valuations will be undertaken consistent with national law and ESS 5 and submitted to the relevant statuary bodies. This ARAP covers the ESS 5 provisions for a resettlement plan to address physical and economic displacement.
7.	**Engagement:** The EEC will engage with PAPs through a formal stakeholder engagement process.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 do not require engagement outside of statutory notices.	Stakeholder engagement and participation will be undertaken consistent with ESS 5.
8.	**Disclosure:** Disclosure of relevant information and meaningful participation of PAPs will take place.	The Electricity Act, 2007 and the Acquisition of Property Act, 1961 do not require disclosure of any information barring individual compensation entitlements.	Stakeholder engagement and participation will be undertaken consistent with EES 5.
9.	**Grievance Mechanism:** The EEC will establish a grievance mechanism to register and resolve resettlement specific grievances.	The Acquisition of Property Act, 1961 allows for appeals and objections to compensation, which are to be resolved by the Board of Assessment.	The EEC will establish a Grievance Mechanism consistent with ESS 5.

4. ANALYSIS OF SOCIO-ECONOMIC IMPACTS AND LOSSES

To allow the development of the Project, the EEC is required to establish a statutory servitude through any private land or property as permitted under Section 55 of the Electricity Act of 2007. The statutory servitude is a 20-metre-wide corridor following the power line alignment (or 10 metres each side of the line centerline). In addition, the EEC is required under the Electricity Act of 2007 to compensate any landowners for the permanent restriction of access to their land in the statutory servitude, or the loss of benefits derived from the land. The project uses the existing 11kV powerline route. The 11kV power line requires a 20-metre servitude, extending 10 metres on either side of the centre line, in accordance with EEC Encroachment Guideline.

EEC retains the right to access this corridor for construction, inspection, maintenance, repair, vegetation management, emergency response, and related operational activities. Landowners and land users may continue compatible uses such as low-growing crops, grazing, and other agricultural activities that do not affect line safety or restrict access; however, permanent structures, tall trees, plantations, and any activity that may obstruct access, damage monopole foundations or stay wires, or compromise electrical safety are not permitted. Where construction access, monopole foundations, stay wires, or clearance requirements affected crops, fruit trees, or productive land use, these impacts were recorded during the asset inventory and valuation process and are addressed through the compensation and restoration measures set out in this ARAP.

4.1 General Social Impact Assessment of Affected People

a) Initial engagement with landowners and land users was undertaken by Malkerns Depot technicians before and during construction to confirm access requirements, explain the works, and identify potential impacts along the line route.

b) A walk-down assessment was conducted on 25 September 2025 by the EEC Assistant Social Standards Officer and the survey team along the Feeder 1003 route to verify the project footprint and identify social and land-use impacts.

c) A kick-off meeting was held between EEC and the appointed valuator at the Malkerns Depot boardroom to introduce the project scope, agree on the valuation approach, and outline the information required for the assessment.

d) A meeting was held at Brookside Lodge to introduce the valuator to the PAPs, explain the valuation process, confirm inspection arrangements, and facilitate the signing of data protection and consent forms.

e) A detailed asset inventory was conducted in May 2026 to identify, measure, and document all affected assets within the project footprint. The inventory provided the basis for valuation, eligibility confirmation, and compensation calculations.

4.2 Inventory and Identification of Affected Assets

A detailed inventory of project-related losses was undertaken in May 2026 by Springfields Property Consultants, a certified property valuation firm. The inventory focused on economic displacement impacts, as the project did not result in physical relocation of households, residential structures, or permanent business structures. The assessment identified and recorded affected crops, fruit trees, land-use restrictions, and disturbances associated with construction activities, monopole foundations, stay wires, and access requirements.

4.3 Valuation Principles

The primary valuation principle adopted for this ARAP is that affected assets and income losses should be compensated at full replacement cost. This approach is intended to ensure that PAPs experience no net loss because of project-related economic displacement. For this project, valuation focused on crops, fruit trees, land-use restrictions, rehabilitation requirements, and disturbance or inconvenience allowances. No residential houses, permanent business structures, graves, or community facilities were identified as physically displaced. The valuation therefore emphasizes economic losses and restrictions on productive land use rather than physical relocation. Where national requirements and ESS5 differ, the more protective standard has been applied for purposes of this ARAP.

4.4 Analysis of Losses

The valuation results for the Malkerns Steel Monopoles Upgrade Project show that project impacts were mainly associated with agricultural production losses and land-use restrictions. This reflects the agricultural character of the project area, where land is primarily used for commercial production of sugarcane, maize, and pineapples. Crop losses account for the largest share of total compensation, representing more than half of the compensation amount. Sugarcane contributed significantly to this category because of its high economic value, longer production cycle, and dependence on continuous harvesting. The valuation therefore considered lost income streams and, where applicable, multiple harvest cycles to ensure that affected farmers are not disadvantaged over the longer term.

The compensation distribution confirms that crop losses are the dominant impact category, accounting for 51.3% of total compensation. Land-use restrictions account for 28.2%, reflecting the longer-term constraints associated with monopole foundations, stay wires, and clearance requirements. Fruit tree losses account for 20.5%; although lower in proportional value, these losses remain important because fruit trees are perennial assets that provide recurring income and household food support. The distribution is illustrated in the figure below.

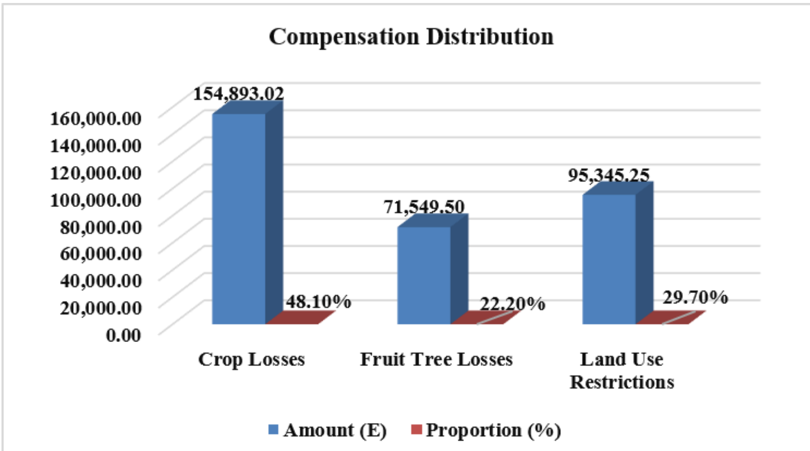

Figure 2: Compensation Distribution and Proportions

A total of thirty-five (35) fruit trees were affected by the project. Banana trees made up the majority, with thirty (30) affected trees, while four (4) avocado trees and one (1) mango tree were also recorded. Although avocado and mango trees were fewer in number, they attract relatively higher compensation because of their longer maturity periods and higher productive value. This indicates that compensation is determined not only by the number of affected trees, but also by their species, maturity, productivity, and replacement value. The distribution of affected fruit trees is shown in the figure below.

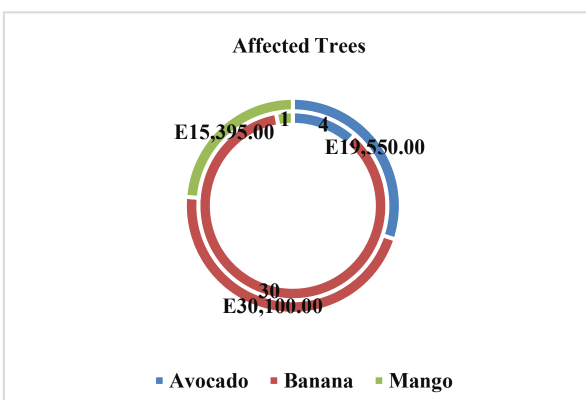

Figure 3:Number of Affected Fruit Trees

The total affected land area was 1,060.85 m^2. Most of this area, representing 82.4%, was associated with temporary impacts on crop production during construction. The remaining 17.6% was subject to permanent land-use restrictions linked to monopole structures, foundations, stay wires, and operational clearance requirements. Although the permanently restricted area is smaller in size, it has a longer-term effect on productive land use. The distribution of affected land area is shown on the figure below.

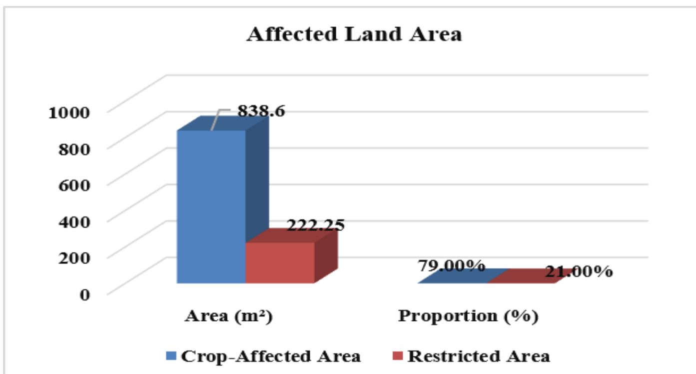

Figure 4: Distribution of Affected Land Area

5. ELIGIBILITY AND ENTITLEMENT FRAMEWORK

5.1 Eligibility Framework

Eligibility was determined after confirming the project footprint, affected assets, affected land users, and the nature of impacts.Eligible persons (encompassing individuals, groups of persons, families, institutions or any other entity that may make a claim for compensation or resettlement assistance for the loss of property which is directly related to the project. Eligible persons are defined as:

a) Persons who have formal legal rights to land or assets, through formally registered title deeds or other relevant proof of ownership.

b) Persons who do not have formal legal rights to land but have a claim through adverse possession or where a person gains additional rights to that land after peaceful occupation of land over a period of time and gains additional rights to that land after peaceful occupation of land over a period of time, and where such occupation is not contested by the landowner.

c) Persons who have no recognizable legal right or claim to land or assets they occupy or use, nor are recognized under national or customary law as rightful occupiers of users of the land.

5.2 Entitlement Matrix for PAPs

The Entitlement Framework establishes different forms of cash or in-kind compensation. Affected women's perspectives are also carefully considered. In this project, the absence of formal title will not constitute a barrier to compensation. Further, the principles adopted herein contain special measures and assistance for vulnerable persons, such as female-headed households, physically challenged persons and the destitute. The types of compensation to be provided depends on (1) whether the restriction to land is temporary or permanent in nature, (2) whether the partial acquisition of land renders it economically viable/non – viable, and (3) the types of losses incurred by eligible persons. A unique element of linear projects is related to the partial acquisition of land. Electricity lines limit acquisition to a narrow strip of land, and do not require the alienation of the entire property. The entitlement is presented in the Table below:

Table 2:Entitlement Matrix Framework

Type of Loss	Viability of land	Eligible Person	Entitlements
1. Loss of Residential Property			
2. Loss of Small-Scale Farmland, Associated Crops and Trees			
Loss of Productive and Ornamental Trees		Tree-owner irrespective of the land tenure arrangements.	1. Cash compensation for the trees being lost covering the productive life of the trees at full replacement cost. **AND** a) Provision of a Disruption Allowance. b) Provision for owners to harvest /fell trees prior to occupation. c) Provision of three replacement saplings per lost tree.
3. Loss of Private Land Supporting Commercial Agriculture/Plantation Land			
Loss of Commercial Crops	-	Crop-owner irrespective of the land tenure arrangement	1. Cash compensation for the commercial crops being lost at *market value* if the crops cannot be harvested prior to the occupation of the land. **OR** 2. Provision for owner to harvest crops prior to the occupation of the land. **AND** a) Provision of a Disruption Allowance. b) Permit continued access to the servitude to continue farming during operations.
Loss of Commercial Trees	-	Tree-owner irrespective of the land tenure arrangements	1. Cash compensation for the commercial trees being lost at *market value*, where the trees cannot be harvested prior to the occupation of the land. **OR** 2. Provision for owners to fell mature trees prior to the occupation of the land. **AND** a) Provision of a Disruption Allowance.
4. Loss of Unutilized Communal/Community Land			
Loss of Communal Land		Swazi National Land (without private claim)	No monetary compensation will be provided. The EEC will permit land users to access the servitude after construction and once the servitude has been rehabilitated to continue to benefit from the use of the communal land.
5. Other Losses			
Disturbance Allowance		Project affected households with	1. Compensation for the loss of opportunity because of the project 2. Administration and transaction

Type of Loss	Viability of land	Eligible Person	Entitlements
		affected assets within the servitude.	3. Transportation to bank

5.2.1 Allowances

The total compensation will include the following allowances

a) **Inconvenience Allowance:** The PAPs losing land, or any assets on that land, will be provided with a disruption allowance to offset the inconvenience of the construction works. This is calculated on 10% of the total compensation amount provided to each PAP.

b) **Land Preparation Allowance**: The PAPs who used land for ploughing will be provided with an allowance to cover the cost of restoring or preparing affected land so that it can return to its original productive use after project related disturbances.

c) **Vulnerability Allowance:** No vulnerable PAPs were identified during the assessment; therefore, no vulnerability allowance is payable under this ARAP.

5.2.2 Livelihood Restoration

Livelihood restoration will focus on ensuring that PAPs whose agricultural activities are disrupted by the Project are able to restore, and where feasible improve, their pre-project income-earning capacity and production levels. As the project causes economic rather than physical displacement, measures will prioritise timely compensation at full replacement cost for affected land-use rights, fruit trees and crops, including losses associated with temporary occupation, restricted cultivation and the period required for replanted crops or trees to reach productive maturity. Compensation will be implemented together with advance notice, opportunities to harvest mature produce before construction, rehabilitation of disturbed agricultural land and clear communication on permitted activities within the servitude.

In addition to cash compensation, the EEC will provide practical support tailored to the nature and duration of each PAP's loss, including farming inputs or replacement saplings. Livelihood restoration outcomes will be monitored through consultation with PAPs and verification of compensation payments, land rehabilitation, replanting and the resumption of productive activities; where monitoring shows that a PAP has not restored their livelihood, appropriate supplementary assistance will be identified and implemented.

5.2.3 Vulnerable People

Vulnerable people are individuals, households, or groups of people who may be disproportionately affected by the land acquisition and resettlement process based on their gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status within their community. The assessment considered these factors when screening the identified PAPs. No vulnerable PAPs were identified for the Project; therefore, no project-specific vulnerability assistance or allowance is required under this ARAP.

5.3 Cut-off Date

The compensation process was carried out after the completion of construction works. Affected individuals were engaged on an individual basis to determine when the impacts occurred, as construction was implemented in sections. The Cut-off date for reporting assets affected by the construction of the line was set as the inspection and valuation date, which took place on 04 May 2026. The valuation report is valid for a period of twelve months. This date was communicated to the PAPs during the meeting that preceded the development of this ARAP. Anything that will be reported after this Cut-off date will not be eligible for compensation and/or resettlement assistance. Similarly, any developments established after the completion of construction shall NOT be compensated. The assets inventory included the explanation of the Cut-off date as well. The measures of the Cut-off date were carried out based on an assumption that there will be no significant time lag between the completion of the census survey and the implementation of the ARAP.

6. GRIEVANCE REDRESS MECHANISM (GRM)

EEC has established a Grievance Redress Mechanism (GRM) to provide Project Affected Persons (PAPs) and other stakeholders with an accessible, transparent, and timely process for raising concerns related to the implementation of this ARAP. The purpose of the GRM is to ensure that grievances relating to compensation, eligibility, valuation outcomes, land-use restrictions, stakeholder engagement, livelihood restoration measures, or ARAP implementation are addressed fairly and efficiently. The GRM is free of charge and does not prevent complainants from seeking remedies through statutory or judicial processes. The GRM iseasily accessible through Malkerns depot, senior technician and the EEC Social Standards Office as well as any member of the ARAP implementation team.

6.1 Notice of the Grievance

Notice of the Grievance Mechanism has already been made public during the previous round of stakeholder engagement, and it will be further disclosed and explained to PAPs during the disclosure of this ARAP and on an ongoing basis. The notices included points of contact including Malkerns depot, social standards as well as the ARAP implementation Team

6.2 Grievance Submission

Grievances may be submitted verbally or in writing through any of the following channels:

a) Malkerns Depot personnel.

b) EEC Social Standards Office.

c) Members of the Resettlement Implementation Team (RIT).

Grievances may relate to, but are not limited to:

a) Eligibility for compensation.

b) Asset inventories and valuation outcomes.

c) Compensation payments.

d) Land access and servitude restrictions.

e) Livelihood restoration measures.

f) Stakeholder engagement processes.

g) Conduct of project personnel.

6.3 Grievance Registration

All grievances received through the various points of contact will be submitted to the Social Standards Office. All grievances received shall be recorded in the Grievance Register maintained by the EEC Social Standards Office. The register shall contain:

a) Case reference number;

b) Date the case is received

c) Details of the person lodging the grievance;

d) Details on the nature of grievance;

e) Person assigned to resolve the grievance;

f) Date the case is resolved; and remarks column

6.4 Grievance Escalation

- **Level 1- Project Level Resolution - Malkerns Depot and RIT:** shall attempt to resolve the grievance directly with the PAPs where it concerns relatively minor issues (incorrect details, errors or omissions in agreements or rephrasing requests of the agreements.
- **Level 2- Eswatini Energy Regulatory Authority:** Where the complainant is dissatisfied with the project-level outcome, the grievance may be referred to ESERA for review and determination in accordance with the Electricity Act, 2007.
- **Level 3 – Judicial Process:** The complainant is at liberty to escalate the matter to a court with competent jurisdiction to determine the matter or grant injunctive relief as may be allowed at law.

6.5 Grievance Management Responsibilities

The Resettlement Implementation Team (RIT) shall oversee implementation of the GRM.
The grievance review team shall comprise:

a) Two RIT members

b) Social Standards Officer

c) Malkerns Depot Representative

d) Other relevant EEC Personnel where required

The team shall be responsible for:

a) Recording grievances.
b) Conducting investigations.
c) Facilitating resolution meetings.
d) Communicating outcomes.
e) Monitoring grievance trends.
f) Maintaining grievance records and reports.

6.6 Monitoring and Reporting

The EEC Social Standards Office shall maintain records of all grievances and prepare periodic reports on:

a) Number of grievances received.
b) Number resolved and unresolved.
c) Types of grievances raised.
d) Average resolution time.
e) Corrective actions implemented.

Monitoring of grievances will assist EEC in improving ARAP implementation and identifying recurring issues requiring management attention.

6.7 Closure and Appeals

The resolution of grievances shall be formally communicated to complainants. Where a complainant is dissatisfied with the proposed resolution, they may appeal internally through the escalation process or pursue remedies through ESERA or the courts. The existence of the GRM does not limit or replace any statutory rights available to PAPs under Eswatini law.

7. BUDGET AND FINANCI PLAN

The RAP implementation budget adopted by the EEC is presented in table 6.1 below, and totals to **SNZ 415,742.77** covering all compensation and in-kind measures for land and improvements made on Tittle Deed Land.

Table 3: ARAP Budget

NO.	DESCRIPTION	COMPENSATION AMOUNT (SZL)
1.	**PAPs Related Budget**	
1.1	Permanent Loss	86,677.50
1.2	Crop Loss	103,781.84
1.3	Fruit Trees	65,045.00
1.4	Land Rehabilitation	37,030.00
1.5	Inconvenience Allowance	29,253.43
SUB-TOTAL		**321,787.77**
2.	Property Valuation Services	93,955.00
GRAND TOTAL		**415,742.77**

The total project budget amounts to SZL 415,742.77, comprising compensation payments to PAPs and property valuation costs. Of the total budget, SZL 321,787.77 is allocated to PAP compensation, while SZL 93,955.00 is earmarked for professional property valuation services. Among the compensation categories, crop loss compensation represents the largest portion at SZL 103,781.84, this reflects the significant impacts of the project on agricultural production and livelihoods. This is followed by permanent land loss and land use restrictions amounting to SZL 86,677.50, and fruit tree compensation totalling SZL 65,045.00. Additional allocations of SZL 37,030.00 for land rehabilitation and SZL 29,253.43 for inconvenience allowances have been included to ensure that affected persons are adequately compensated, and that impacted land is restored to productive use.

8. INSTITUTIONAL ARRANGEMENTS – ROLES AND RESPONSIBILITIES

This chapter establishes the organizational structure for implementing the provisions of this ARAP. This includes assigned roles and responsibilities, implementation costs and schedule, and monitoring and review requirements.

8.1 Roles and Responsibilities

The following departments will play a direct or supporting role in the implementation of this ARAP:

8.1.1 Operations

The operations department retains full responsibility for all land acquisition and resettlement undertaken in support of the Project. The department will, however, delegate its management responsibilities to the Resettlement Implementation Team (RIT). The department will:

a) Providing the staffing and resources to successfully implement the provisions of this ARAP;

b) Authorize the ARAP prior to implementation;

8.1.2 Resettlement Implementation Team (RIT)

The RIT is to manage the development and implementation of the ARAP and its responsibilities will include:

a) Monitor and report on progress on land acquisition and resettlement as part of reporting requirements;

b) Provide coordination between the PIU and other EEC Departments;

c) manage the allocation and distribution of funds to cover compensation payments.

d) manage all stakeholder engagement as well as the disclosure of the ARAP report;

e) manage all negotiations with PAPs and secure signatures on the Compensation Agreements;

f) effect all payment of compensation to PAPs including retaining a record of payment;

g) implement all livelihoods restoration measures; and

h) manage and resolve grievances raised under the Grievance Resolution Mechanism

8.1.3 Social Standards Office

All implementation and day-to-day management requirements will remain with the Social Standards Officer who will take ultimate responsibility and Malkerns Depot. Both the Social Standards Officer and the depot will be retained under the RIT:

9. TIMETABLE OF EVENTS

9.1 Implementation Schedule of the ARAP

The implementation of the provisions of the ARAP is expected to be focused over five months to incorporate ARAP-related complaints. The compensation process can only be closed out once the servitude has been rehabilitated and PAPs have been notified that they may have access to servitude. Compensation payments will be once off- no annual compensation will be made, since the compensation process began towards the completion of the construction phase. Other key scheduling constraints will include:

Table 4:Timeframe and Schedule of Activities for the Implementation of the ARAP

No.	ARAP Implementation Activities	Timeline
1.	ARAP disclosure and comments period	30 Days
2.	Compensation Disclosure	14 Days
3.	Payment terms from signing	45 Days

10. MONITORING AND EVALUATION

There will be a resettlement monitoring and evaluation programme. The objective is to determine the extent to which resettlement is successfully implemented. The programme will have four broad components:

a) Performance monitoring

b) Effects monitoring

c) A completion audit

10.1 Performance Monitoring

The RIT will coordinate performance monitoring to measure progress with resettlement against scheduled tasks and milestones. Monitoring reports will be prepared on a quarterly basis for the year of the implementation of the ARAP until the resettlement is deemed completed. A completion audit will determine the final completion of the resettlement process. The monitoring reports will be distributed to all relevant parties.

10.2 Effects Monitoring

The RIT will be responsible for effects monitoring and may contract some components to qualified individuals in the project communities. Effects monitoring will focus on the effectiveness of the ARAP, the identification of constraints, and the recommendation of corrective measures that may be necessary. Indicators and targets for effects monitoring will be established by the Social Standards Office, in consultation with representatives of project affected households. Effects monitoring will be conducted bi-annually and data will be collected from households by the depot or social using standardized, quantitative socio-economic survey instruments.

10.3 Completion Audit

A complete audit will be undertaken internally, one year after ARAP implementation. The objective of the audit will be to:

a) Confirm that physical inputs specified in the ARAP and subsequent resettlement implementation plan have been delivered.

b) Assess whether outcomes of resettlement are positive in the community.

11. STAKEHOLDERS CONSULTATION

11.1 Introduction

Consultations with PAPs were carried out (Table 10.1 below) mainly to gather their concerns about the project and to establish impacts and risks that PAPs may face due to the construction of the transmission line. The RIT has engaged with PAPs in the preparation of this ARAP and will continue to engage with PAPs during the implementation of this ARAP.

11.2 Past Engagements

The public and closed meetings on resettlement undertaken in the past are summarized in Table 10.1 below.

Table 5: List of Forma1 Engagements and Engagement Dates

No.	Stakeholder	Purpose of Engagement	Date
10.1	Property Valuator	Kick off meeting for scoping of activities to be undertaken by the consultant.	27 April 2026
10.2	TDL PAPs	Introduction of Valuator and arrangements of inspection dates with PAPs	30 April 2026

11.3 Methods of Engagements

11.3.1 Individual Engagements

Affected households were issued with notices at the start of the project, PAPs were further engaged during the construction phase on the construction process and timelines. This approach was especially important for addressing specific concerns, such as those raised by individuals with unique circumstances related to land or property.

12.3.2 Public Meetings

Affected people were also through a public meeting, where they were informed about the project and its implications for their properties and the valuation process was explained. The same meeting was used to introduce the valuator and make a valuation schedule suitable for all PAPs. This engagement process was essential for ensuring transparency and building trust with landowners. The project team provided detailed information on compensation measures and support available for affected landowners, fostering an understanding of their rights and options.

12.3.3 Choice and Right

The EEC recognizes the importance of respecting the rights of affected individuals while empowering them with choices throughout the resettlement process. This section outlines the principles guiding the choices available to stakeholders and their rights in relation to the project.

a) Principles of Choice

i) **Informed Decision-Making** - Affected individuals will be provided with comprehensive information regarding the project, including its potential impacts, compensation options, and timelines. This ensures that stakeholders can make informed decisions about their involvement in the resettlement process.

ii) **Voluntary Participation** - Affected parties have the right to choose whether to accept compensation offers or participate in relocation efforts, without any coercion or pressure.

iii) **Options for Compensation** - A variety of compensation options will be made available to affected individuals, including cash compensation or in-kind assistance. Stakeholders are encouraged to select the option that best suits their individual circumstances and needs.

b) Rights of Affected Individuals

i) **Right to Information** - Affected individuals have the right to access relevant information about the project, including details on compensation policies, potential impacts, and the resettlement process. Information will be disseminated through public meetings, individual consultations, and written materials and published on the EEC website.

ii) **Right to Consultation** - Individuals have the right to be consulted about decisions that affect them. Feedback gathered during stakeholder engagements will be considered in the preparation and implementation of this ARAP.

iii) **Right to Fair Compensation** - Affected individuals are entitled to fair and timely compensation for any losses incurred because of the project. Compensation will be determined based on established criteria and in line with applicable laws and regulations.

iv) **Right to Grievance Redress** - A transparent grievance redress mechanism will be established to address any concerns or disputes that may arise during the resettlement process. Affected individuals will have the right to submit grievances and receive timely responses.