



Kuzbass Pischekombinat
Livestock and Meat
Processing Project

Public Consultation and
Disclosure Plan

Prepared for:

**Kuzbass Pischekombinat
Novokuznetsk, Russia**

Prepared by:

**ENVIRON
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1 Introduction

The Kuzbassky Pischekombinat meat production company is planning to expand its livestock rearing and meat processing facilities at a number of locations. This document outlines how the Company intends to disclose Project information and consult with relevant stakeholders on their expansion plans; it is referred to as the Project's 'Public Consultation and Disclosure Plan' (PCDP).

1.1 Project description

The Kuzbassky Pischekombinat Company (KPK) produces meat products for sale within Siberia, operating a number of existing farms and meat processing facilities. KPK's main meat processing facilities are located in the town of Novokuznetsk, Russia from where it distributes meat products throughout Siberia.

KPK is currently in the process of expanding its facilities through a series of farm acquisitions, expansions and the construction of new facilities (the 'Project'). Through its proposed investment plan the Company hopes to control all elements of the meat production process, including the production of its own animal feed, cattle and pig farming, slaughter, meat processing and distribution of the finished product to market. This approach will allow the quality of meat product to be managed from the initial stages through to the point of public sale and ultimately result in an improved availability and quality of product.

KPK's current operational facilities include:

- an existing meat processing facility in Novokuznetsk where they produce a variety of pork and beef based meat products, including smoked sausages;
- a newly constructed and part operational pig farm located approximately 40 km North of Novokuznetsk near the village of Shkolnoe;
- a recently acquired beef cattle farm located 200km east of Novokuznetsk near the village of Parhaevka;
- a recently acquired dairy farm located 200 km northeast of Novokuznetsk near the village of Pushkino;
- a recently acquired small scale animal slaughter facility located close to the dairy farm and the village of Krasninskoe.

The Company also intends to invest in a number of new build facilities and the upgrade of existing facilities as follows:

- a number of upgrades and improvements to the existing meat processing facilities in end of 2008;
- further expansion of the newly constructed pig farm (phase 2), doubling the size and capacity of the farm by the end of 2009;

- upgrade of the recently acquired dairy farm replacing the old facilities with new build facilities (barns and milking parlour) and restocking the herd by the end of 2009;
- upgrade of the recently acquired beef cattle farm replacing the old facilities with new build facilities (over wintering barns) and restocking the herd by the end of 2009;
- upgrade of the existing slaughter house located close to the dairy farm by the mid of 2009;
- construction of a 'new build' animal slaughter facility by mid 2009 close to the pig farm;
- construction of a 'new build' animal feed production plant (using bought-in raw materials e.g. grain), starting in November 2008 with completion anticipated in mid 2009 till the mid of 2009;
- distribution and sales network, including its own shops, to be established between December 2008 and the middle of 2009.

At the existing meat processing site, slaughter facility, dairy farm and beef cattle farm the company will either reuse existing buildings or in the case of the farms, existing facilities will be demolished and the same land used for the new facilities (cow sheds). For the 'new build' facilities (new slaughter house, expansion of the pig farm and feed production plant) construction will take place on 'greenfield' land that is designated for agricultural use. The facilities are widely dispersed with distances of between several kilometers and tens of kilometers separating the sites.

The Company intends to use modern technologies and equipment imported from Western Europe. The buildings have a relatively simple design and can be erected over short durations using KPK's own construction workforce. Nevertheless the Project has the potential to result in adverse environmental and social impacts if badly managed and is therefore subject to a number of OVOS (Environmental Impact Assessments) as required under RF law, which must be publicly disclosed. These and other disclosure materials for public consultation are discussed further in Section 4.

The location of these facilities is shown in Annex A.

1.2 Purpose of the Public Consultation and Disclosure Plan

This PCDP is designed to ensure that KPK identifies all stakeholders with an interest in their Project, and can meaningfully consult these stakeholders during the development and life of the Project. To this end this PCDP outlines the Company's plans to engage with its stakeholders during the scoping, OVOS (Russian ESIA), construction and operation phases of the Project. This engagement includes both the provision of relevant, timely and accessible information to stakeholders, and consultation with stakeholders on their opinions, concerns and preferences about Project design and proposed management and mitigation measures for potential impacts.

To this end, this PCDP therefore describes the:

- National and international requirements for public consultation and disclosure that the company will conform to;
- Project stakeholders that have been identified;
- Strategy, format and timetable for consultation and information disclosure
- Company's resources and management structure for developing and implementing the PCDP;
- Public grievance mechanism, and:
- Means of reporting on consultation and disclosure activities.

2 Regulatory Context

2.1 Russian Federation Requirements for Public Consultation

Russian legal requirements for public consultation when identifying project sites and constructing and refurbishing capital construction facilities are set forth in the following acts:

1. The Urban Development Code of the Russian Federation No.190-FZ dated 29 December 2004 (Article 2) which states that urban development (area development and planning, as well as capital construction and refurbishment projects) should meet the participatory principles of involving individuals and civil society in implementing such projects.
2. Federal Law No.7-FZ dated 10 January 2002 "On Environmental Protection" states that:
 - Business and other activities with environmental impacts should take into consideration the participatory approach to the decision making process related to the rights of the citizens to favorable environment as per the applicable legislation (Article 3);
 - When deciding on the location of a project that may have a detrimental environmental impacts, public opinion should be taken into consideration (Article 13).

Procedures for organizing and carrying out public consultations for business or other activities is set forth by Order of Goscomecology of the Russian Federation No.372 dated 16 May 2000 "On Approval of By-Law on Assessing the Environmental Impact of the Proposed and Other Projects (hereinafter, By-Law) as registered by the Russian Ministry of Finance, Registration Number 2303, dated 04 July 2007.

The OVOS By-Law has a concept of “public consultations”, which are to be carried out as part of Environmental Impact Assessment (EIA), and other regulatory acts aimed at informing the public about the proposed project and potential impacts on the environment. These consultation exercises should identify public preferences so that they can be taken into account in the OVOS process. Public consultations can be conducted using a variety of methods, such as surveys, hearings, or referenda.

Responsibility for consultations

According to the OVOS By-Law, the responsibility for organizing public consultations lies with the Project proponent. The procedures for public consultations will be set forth by the local self-government authorities with the participation of the Project proponent (par. 4.9 of the OVOS By-Law). Representatives of the local authorities must be present at public consultations, which are to be carried out by the Project proponent. The expenses associated with the organization and carrying out of public consultation are to be borne by the Project proponent.

Public Consultations Timeframes

According to the OVOS By-Law, advertisements should be posted in the local mass media about where and when the OVOS TOR will be published and preliminary OVOS materials made available for review, before the public consultations about OVOS materials are carried out. This process should take from 1.5 to 3 months.

Subject Matter of Public Consultations

According to OVOS By-Law, the subject matter of public consultations should be the preliminary EIA materials for the proposed project.

Participants of Public Consultations

Public consultations may involve any representatives of the public concerned, including individuals and non-governmental organizations.

2.2 International requirements for a PCDP

In addition to the Russian regulatory requirements described above in Section 2.1, the Project will also conform to the public consultation requirements of the European Bank for Reconstruction and Development (EBRD) which is one of the Project’s potential funders. Specifically the Project will conform to the Public Consultation and Disclosure requirements outlined in Annex 2 of the EBRD Environmental Policy of 2003. This requires that the KPK Project, which is classified as category ‘A’ project by EBRD, should develop a PCDP which describes:

- the public who may be affected by the project,
- how meaningful communication will be ensured, and

- what information will be disclosed in relevant languages and by what means.

In particular the EBRD requires that the OVOS (ESIA) must be made publicly available for comment in a format which is accessible to the majority of people affected by the Project.

In addition the EBRD requires that the projects it supports conform to the spirit, purpose and goals of the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the Aarhus Convention). This PCDP therefore takes account of the measures required by the Aarhus Convention.

The EBRD is considering provision of funds for a number of the sub projects listed above, specifically the:

- new slaughter house;
- expansion of the existing dairy farm;
- proposed acquisition of a new meat processing facility, and;
- a distribution and sales network, including its own shops.

3 Identification of stakeholders

3.1 Introduction

Project stakeholders are ‘people who have a role in the Project, or could be affected by the Project, or who are interested in the Project’¹. Project stakeholders can be grouped into **primary stakeholders** who are “...individuals, groups or local communities that may be affected by the Project, positively or negatively, and directly or indirectly”... especially... “those who are directly affected, including those who are disadvantaged or vulnerable” and secondary stakeholders, who are “...broader stakeholders who may be able to influence the outcome of the Project because of their knowledge about the affected communities or political influence over them..”²

In addition, ‘legitimate stakeholder representatives’ may be identified for some of the stakeholder groups. These are people or organisations who have broad based support amongst the stakeholder groups identified and can act as a two way channel of communication between the company and its stakeholders. Legitimate stakeholder representatives can include, for example ‘...elected officials, non-elected community leaders,

1 EBRD, 2003, Consultation and Disclosure Requirements: Guidance for Preparation of a Public Consultation and Disclosure Plan, EBRD Environment Department

2 International Finance Corporation (IFC), 2007, Guidance Note 1 on Social and Environmental Assessment, para G15

leaders of informal or traditional community institutions, and elders within the affected community³.

3.2 Project Stakeholders

The primary and secondary stakeholders that have been identified for the Project to date are listed below. During planned consultation activities KPK will identify legitimate representatives of primary stakeholder groups who will be targeted with Project information and consulted on the preferences and opinions of their stakeholder group.

Primary Stakeholders

- Owners and employees of the neighboring farms and agricultural companies
- Competitive meat processing factories
- Shop owners purchasing processed meat products
- Future employees of Kuzbass Pishchekombinat facilities, which are now under construction or upgrade;
- Students of agriculture;
- Local communities in proximity to the new slaughter house and dairy farm (Shkolnoe/Prokopievsk and Pushkino)

Secondary Stakeholders

- Local Authorities:
 - Prokop'evsk Administration;
 - Prokop'evsky Raion Administration;
 - Promyshlennovskiy Raion Administration;
 - Administration of rural areas: villages Parhaevka, Pushkino, settlement Krasninskoe.
- Executive authorities of the local self-government in the sphere of environmental, architectural issues, land management and public relations.

Prokop'evsk Raion Administration: 653033, Prokop'evsk, Gagarina street, 1-v, tel.8(3846) 62-12-24

- Head of Prokop'evsk Raion – Akhmedgareev Rinat Flyurovich;
- Chief architect of Prokop'evsk Raion – Medvedeva Nadejda Ivanovna
- Land department of property relations committee- Prokopievsk, Ganich Igor Pavlovich

Prokop'evsk Administration: 653000, Prokop'evsk, Artema street, 9, tel.8(3846) 61-22-33, e-mail adm-Prokopievsk@ako.ru

- Head of Prokop'evsk – Garanin Valery Anatol'evich;

Pushkino community hall: Krasninskoe, Sadovaya street, 7-b, tel. 8 (38442) 6-83-20
Head of Pushkino community hall – Solov'ev Alexander Vasil'evich;

³ IFC, 2007, Guidance Note 1 on Social and Environmental Assessment, para G15

Terent'evskaya rural region Administration: Terent'evskoe, Tsentral'naya street, 11, tel. 8 (3846) 64-33-44

Yasnopolyanskaya rural region Administration: Yasnaya Polyana, Shkol'naya street, 5a

Burlakovskaya region Administration: Burlaki, Beregovaya street, 2.

Promyshlennovsky Raion Administration: Promyshlennaya, Kommunisticheskaya street, 23, tel. 8 (38442) 7-40-84, 7-11-45, e-mail adm-Promishl-rn@ako.ru

- Head of Promyshlennovsky Raion – Shmidt Alexander Ivanovich.

- Specific designated supervisory authorities including:
 - The Kemerovo Oblast Rosprirodnadzor; Head of Department – Malakhov Sergey Mstislavovich, address: Kemerovo, Nogradskaya street, 19a; tel. (3842) 25-93-54; e-mail kemkpr@kemnet.ru
 - The Kemerovo Oblast Rostekhnadzor; Vice head of Department – Smirnov Nikolay Pavlovich, address: Kemerovo, Institutskaya street, 3, tel. (3842) 64-54-20
 - Kuznetskoe department of Rostekhnadzor: Head of Department – Chervyak-Voronich Sergey Mikhailovich; address: Kemerovo, Smirnova street, 22a, tel. (3842) 34-20-47
 - The Kemerovo Oblast Rospotrebnadzor: Head of Department – Minakov Evgeny Stanislavovich; address: Kemerovo, Kuznetsky prospect, 24
 - Territorial branches the Kemerovo Oblast Rospotrebnadzor in Prokop'evsky raion: Head of Department – Kotelevskaya V.A.
- NGOs
 - Prokop'evsky Raion branch of All-Russian Veterans' (pensioners) Organization;
 - Promyshlennovsky Raion branch of All-Russian Veterans' (pensioners) Organization.

4 Disclosure and Consultation

4.1 Consultation Undertaken to Date

KPK has already undertaken one public consultation activity as part of the overall expansion Project, namely the development of the OVOS (Russian ESIA) for the pig farm (Phase 1) including the concept of a nearby slaughter house and a nearby fodder production plant. Information about the pig farm OVOS declaration of intention and Terms of Reference was published in mass media (4 articles were published in newspapers ("Selskie vesti", "Novokuznetsk", "Selskaya nov", "Ves Prokopievsk and Kiselevsk"), 4 notices were published in the Internet (www.kpk.ru, www.kuzinform.ru, www.ecoindustry.ru, www.infoline.ru), 1 announcement was made on the TV (Novo-TV) and posted on the internet, libraries, colleges, shops, cultural centers of the settlements Terentievskoe,

Shkolnoe, Burlaki, Uskat between 26/04/06 and 27/05/06 and official copies were sent to local authorities. A public opinion survey was organised using a suggestions and comments log book and discussions in print media: The results of public discussions were published on the of Rosnadzor internet site <http://www.rosnadzor.ru>.

Further public consultations were considered unnecessary by the heads of the districts, and there were no claims or objections from local stakeholders regarding the chosen site in Prokopievsk.

The OVOS for the Phase 1 Pig farm can be accessed at ZAO "KPK" office in Novokuznetsk as hard copy upon the request.

4.2 Future Disclosure and Consultation

KPK will release an environmental 'disclosure package' on the 15th October 2008 in Russian. The disclosure package will include:

1. a draft OVOS (Russian ESIA) for the proposed new slaughter house facility;
2. release of the OVOS (Russian ESIA) for the current Phase 1 pig farm
3. an addendum to the OVOS to fulfill EBRD's requirements for any supplementary environmental and social assessment requirements. Additional information will include a description of the proposed dairy farm expansion (current operations, proposed expansion, potential negative and positive affects, mitigation measures or, in the case of positives impacts, enhancement measures).
4. a non-technical summary (NTS) that will include:
 - an overview of the Project including **all** Project sites and proposed expansions,
 - a summary of the draft OVOS findings, including potential environmental and social impacts and proposed management measures identified in both the OVOS documentation and supplementary ESIA documentation.

A notice will be printed in local mass media to launch the disclosure package, providing information on where the disclosure package will be available, how to contact the Company for comment and the times, dates and location of any public meetings (articles will be published in newspapers "Selskaya nov" and "Ekho"; the first article will be published at 15th October 2008. The notice will also be posted within the village halls and shop windows of Shkolnoe/Prokopievsk and Pushkinskoe. Local authorities will be contacted directly.

The notice will specify the cut off date for feedback (anticipated to be 15th December 2008). Copies of the NTS will be posted to selected secondary stakeholders and legitimate representatives of primary stakeholders. The entire disclosure package, including the NTS and the underlying environmental assessments, will be made available for public review. Due to the size of some of these documents it will not be feasible to disclose these via the

internet. Thus the disclosure package will be made available in a variety of locations and formats as described below.

The Non Technical Summary will be available:

- electronically on the KPK website;
- electronically on EBRD's London and Moscow office website;
- as a hard copy in the Agro College Shkolnoe and Pushkino village community hall; and
- as a hard copy in KPK's main office in Novokuznetsk.

The OVOS materials and supplementary information is not suitable for the website downloads. Hard copies will be available at KPK's main office in Novokuznetsk for any stakeholders. Further hard copies will be made available at the Shkolnoe/Prokopievsk and Pushkino community halls and in EBRD offices in Moscow.

Contact details and web addresses for each of the above are provided in Section 8.

Feedback on the Project and the OVOS will be solicited through a suggestions and comments log books located in the Agro College Shkolnoe and Pushkinskoe village hall, a phone log, discussions with stakeholder representatives, and a comments space on the company web site (see Section 6).

In mid-November 2008 public meetings targeted at primary stakeholders will be held in settlements close to Project facilities, specifically Terentievskoe, Shkolnoe, Krasninskoe, Parhaevka, Pushkino. These meetings will be used to give presentation of the NTS, and solicit feedback from local stakeholders. Transport and other assistance to attend the meeting will be given to elderly or disabled residents and those living in remote households as necessary should they be unable to make their own transport arrangements.

Proposed dates for public meetings are

Meeting 1. To be held in the Agro College in Shkolnoe on 15th November 2008 at 10.00h.

Meeting 2. To be held at the Community Cultural Centre in Krasninskoe on 15th November 2008 at 15.00h.

Additional advertisement about the meetings will be made one week before the meeting.

The meetings will be attended by representatives of KPK. The EBRD will also have a representative to oversee the meetings.

4.3 Consultation during Construction and Operations

During construction KPK and contractors will:

- Inform affected communities about any construction activities that may affect them;
- Inform affected communities on the progress of construction;
- Solicit feedback from community member on the effectiveness of any mitigation measures for construction nuisance, and;
- Implement the company Grievance Procedure (see Section 6 below).

Throughout the life of the Project KPK will continue to update stakeholders on company performance and any proposed Project changed (e.g. additional expansions) using the Company website and notices in local media as necessary. In addition the public will be able to use the grievance procedure, or contact with chief specialist Kirienko Konstantin Vasil'evich with suggestions or comments at any time using the contact details Section 8 of this PCDP.

5 Resources and Responsibilities

Stakeholder engagement activities will be coordinated by KPK's chief specialist Kirienko Konstantin Vasil'evich, who reports to the General Director.

Kirienko Konstantin Vasil'evich will be responsible for the disclosure of Project information, public consultation activities and the management of the KPK Public Grievance Procedure (see Section 6, below).

6 Grievance Mechanism

6.1 Introduction

It is not anticipated that KPK's expansion plans will have significant environmental and social impacts, and plans will be made to manage (avoid, mitigate or compensate) any potential environmental or social impacts identified during the ESIA process as part of KPK's Environmental and Social Monitoring and Management Plan (ESMMP) which will be included within the disclosure package.

However, to ensure that the Company is made aware of, and thereby able to manage or compensate, any unexpected environmental and social impacts, KPK has developed a Public Grievance Mechanism.

6.2 Procedure

KPK has developed a Public Grievance Procedure and a Public Leaflet describing this procedure (see Appendix B). The leaflet will also be posted on KPK's website and KPK will ensure that Public Grievance Leaflets are available at pig farm's security gate and the main meat processing premises in Novokuznetsk (address provided in Section 8) and at local government offices or cultural settlements in neighbouring settlements (Terent'evskaya rural region Administration and Yasnopolyanskaya rural region Administration).

When KPK receives any public grievances, these will be managed through a series of steps (see Annex B). Grievances will be acknowledged in writing within 10 days, given a reference number and a staff member will be given responsibility for investigating the grievance. KPK aims to complete investigations within 20 working days from the grievance being acknowledged and once investigations have been completed will contact the complainant to discuss and agree resolution. After resolution has been agreed and implemented KPK will undertake follow up monitoring to check that the problem does not recur. KPK's management and resolution of any grievances will be subject to EBRD monitoring of the Project should EBRD provide financing.

Complainants will have the opportunity of maintaining confidentiality when lodging grievance, and KPK will ensure that the name and contact details of complainants are not disclosed without their consent and only the KPK team directly working on the investigation of the grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing the complainant's identity (for example if they are required to give evidence in court) the investigation team will discuss with the complainant how they wish to proceed. The procedure also allows for anonymous complaints to be lodged. In this case the grievance will still be investigated, but the company will not be able to give feedback to the complainant.

All grievances will be logged in a company grievance log, which will include:

- The reference number;
- The date the grievance was lodged;
- Content of the grievance;
- Date the acknowledgment was sent;
- Date the investigation was completed;
- Findings of the investigation;
- Proposed resolution, and;
- Statement of satisfaction of the complainant, or reason for non-resolution of the grievance.

The procedure will be operational from the date the disclosure package is released (in mid October 2008).

7 Reporting

KPK will publish its finalized OVOS documents, issues raised during the consultation process and appropriate feedback on its website and place hard copies, which should not be removed, in local libraries.

Throughout the Project, KPK will maintain communication channels with relevant stakeholders. In addition to the Grievance Procedure, KPK will notify interested

stakeholders⁴ of any significant Project events, for example, changes in the Project schedule or major activities such as the onset of construction activities. KPK will provide Project updates on its web site and notify stakeholders via e:mail. For those stakeholders without access to e-mail, notifications will be posted in the community halls of Project affected residential areas.

During construction and operations, KPK will produce an annual environment and safety report, which will include a summary of the Company's performance on management of health, safety, environment and social issues. This will be posted on the KPK website and placed in local libraries and cultural centres each year following site commissioning. Wherever possible stakeholders will be informed about the report by e:mail and provided with a link to the website.

8 Contact Details for the Public

KPK's main offices

Contact

Kirienko Konstantin Vasil'evich, chief specialist

Phone number: (3843) 36-12-90

e-mail: pd@delikates-nk.ru

Address

KUZBASSKY PISCHEKOMBINAT

17 Technichesk proezd. 5

Novokuznetsk, 654034

Kemerovo region, Russia

Website: www.kpk.ru

EBRD London (Business Information Centre)

EBRD

One Exchange Square

London EC2A 2JN, UK

Tel: +44 20 7338 6747

Fax: +44 20 7338 6155

Website address. <http://www.ebrd.com/projects/eias/index.htm>

⁴ Interested stakeholders include those identified during the consultation process and other stakeholders identified after the consultation process with a legitimate interest in the Project.

EBRD Moscow

Ducat Place III
Second floor
6 Gasheka Street
Moscow 123056
Russia
Tel: +7 (495/501) 787 1111
Fax: +7 (495/501) 787 1122

Shkolnoe/Prokopievsk community hall

Agro College, Shkolnoe, Tsentral'naya street,3
Phone number (waiting room): 8 (38466) 64-00-18;
Phone number (Head of Agro College – Snitko Vasily Petrovich): 8 (38466) 64-15-31

Pushkino community hall

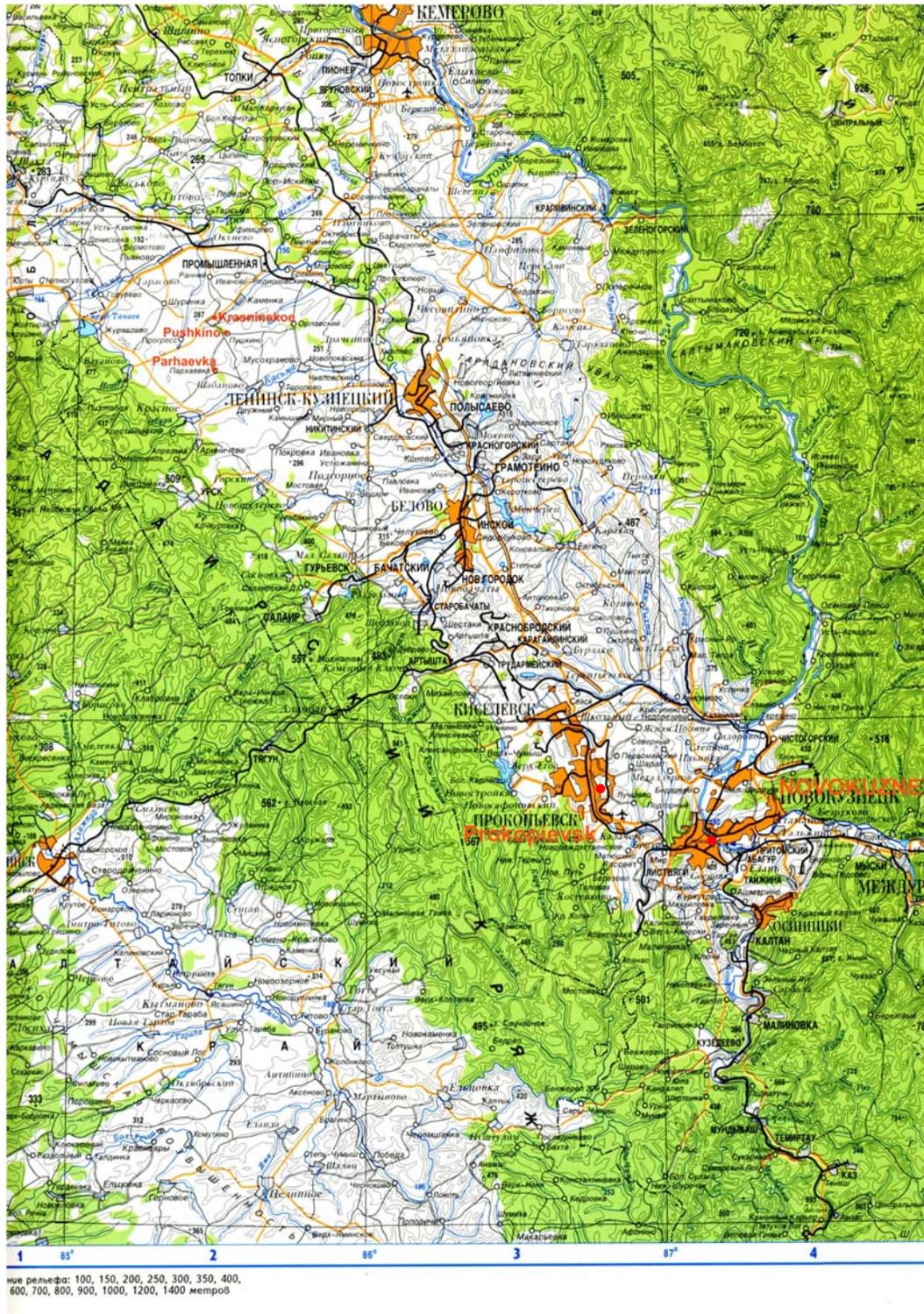
Pushkinskoe Administration Building, Krasninskoe, Sadovaya Street, 7-b.

Contact

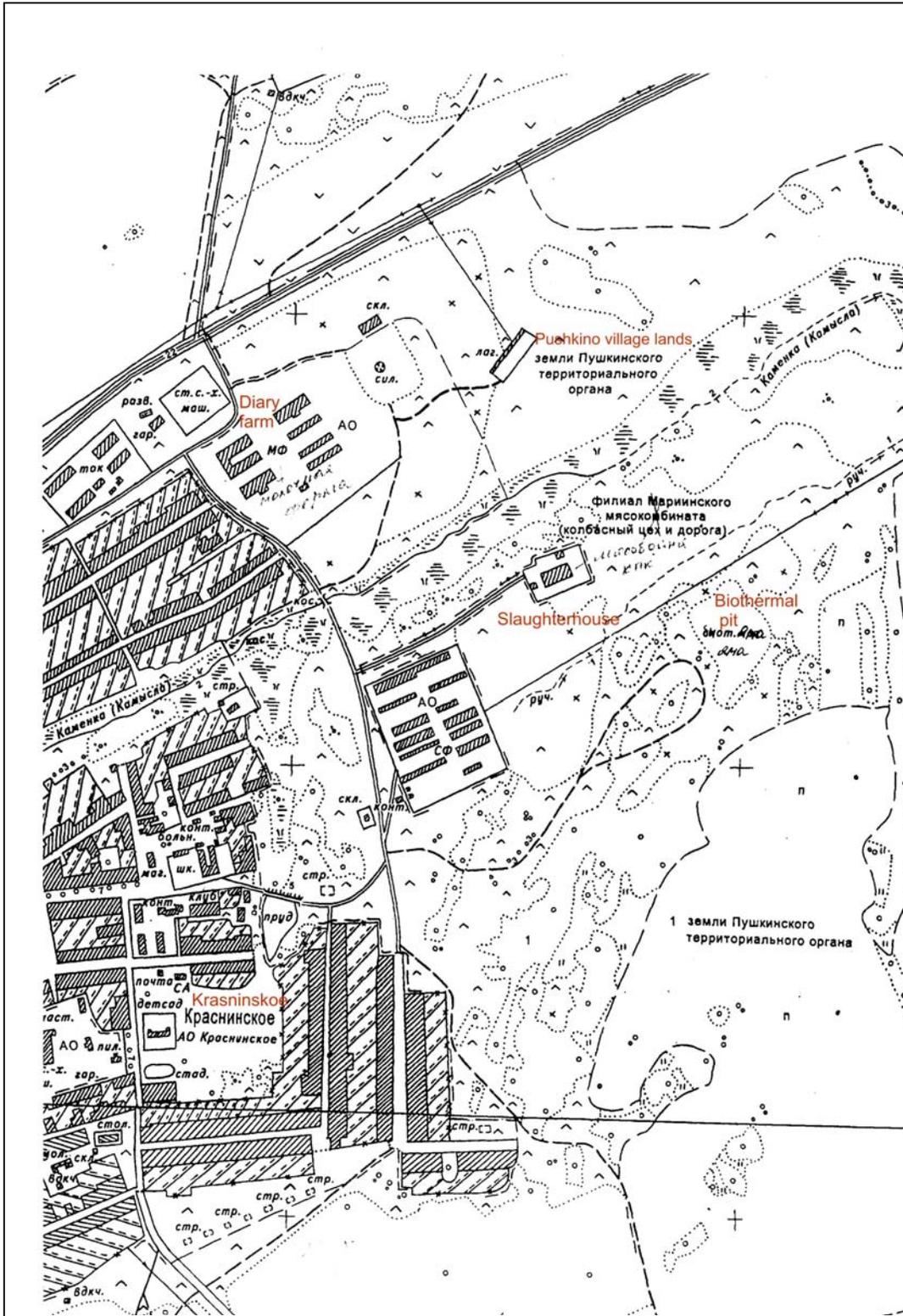
Denisova Juliya Vasil'evna, Vice head of Department
Phone number: (38442) 68-3-20

Annex A: Map showing the location of proposed facilities

Annex A1. Map indicating location of all facilities



Annex A2. Location of dairy farm and existing slaughterhouse



Annex A3. Location of pig farm complex (including slaughterhouse)



Annex B: Public Grievance Leaflet

Annex B

Kuzbass Pischekombinat (KPK) Public Grievance Leaflet

KPK produces meat products for sale in Siberia. Currently the company is expanding its operations and constructing a number of new meat and dairy farming and processing facilities. KPK is striving to ensure that this expansion work will not cause any problems for those living around its Project sites. However we would like to hear about any concerns or grievances that you have in relation to the company's activities.

What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that KPK's activities are negatively affecting them, their community or their local environment. Example of grievances could include, for example:

- Negative impacts to local residents (such as excessive dust, noise, odour or blocking of roads and access routes)
- Environmental damage resulting from Project activities
- Practices that endanger the health and safety of employees or residents
- Failure to meet the labour rights of KPK or contractor employees

How can I submit a grievance?

Anyone can submit a grievance to the company in the following ways:

- By phone to Kirienko Konstantin Vasil'evich on (3843) 36-12-90
- By e-mail on pd@delikates-nk.ru
- In person to the Kirienko Konstantin Vasil'evich during normal working hours (via the security gate).
- By completing the attached grievance form and posting it to or dropping it at the locations specified on the form or any of the following addresses:
 - 17 Technichesk proezd, 5, Novokuznetsk, 654034, Kemerovo region, Russia (KPK);
 - Shkol'noe, Tsentral'naya street, 3 (Agro College);
 - Krasninskoe, Tsentral'naya street, 11 (Community Cultural Center).

How will KPK deal with my grievance?

KPK will go through the following steps to deal with you grievance:

Step 1: Acknowledgement KPK will contact you to acknowledge your grievance within 10 working days of receiving it. This acknowledgment will include your grievance reference

number, the person at KPK responsible for tracking your grievance and their contact details, and the expected date for completing the investigation into your grievance.

Step 2: Investigation: KPK will then set up an investigation into your grievance. We may need to contact you during this investigation. KPK will aim to complete the investigation within a further twenty working days.

Step 3 Resolution: When we have investigated the grievance we will contact you with our findings and our proposed response. If our investigations find that the grievance does not relate to the company's activities, or if KPK is working within the relevant Russian and International Standards in relation to the grievance (e.g. for grievances related to environmental impacts of the Project) we will explain this in writing to you. Otherwise we will propose a response to address the grievance. If you consider our response (and its implementation) to be satisfactory we will ask you to sign a statement of satisfaction if you are happy to do so. If you are not satisfied with our response we will have further discussions with you to see if there are other steps which can be taken to resolve the grievance.

Step 4 Follow up: KPK may contact you at a later stage to check that our activities pose no further problems.

Confidentiality: If you wish your grievance to remain confidential, KPK will ensure that your name and contact details are not disclosed without your consent and only the KPK team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity (for example if you are required to give evidence in court) the investigation team will discuss with you how you wish to proceed.

Anonymity: If you wish to lodge a grievance anonymously you can do so using the attached form without filling in the name and contact details. In this case the grievance will still be investigated, but it may be more difficult for KPK to conduct the investigation and we will not be able to give you feedback on our investigations.

KPK Public Grievance Form			
KPK Grievance Reference Number (to be filled in by KPK):			
Contact Details	Name:		
	Address:		
	Tel:		
	e-mail:		
How would you prefer to be contacted by KPK? Please tick box	By post	By phone	By e-mail
Passport number ⁵ :			
Details of your grievance. Please describe the problems, who it happened to, when, where and how many times, as relevant			
What is your suggested resolution for the grievance?			
How to submit this form to KPK	By Post to: Kirienko Konstantin Vasil'evich KUZBASSKY PISCHEKOMBINAT, 17 Technichesk proezd. 5, Novokuznetsk, 654034, Kemerovo region, Russia		
	By hand: please drop this form at the box at the site gates at the above address or the Agro College, Shkol'noe, Tsentral'naya Street, 3 or the Community Cultural Center (Krasninskoe), Tsentral'naya Street,11		
	By e-mail: Please email your grievance, suggested resolution and preferred contact details to: pd@delikates-nk.ru		
Signature		Date	

⁵ (Your passport number is required by Russian Law when registering an official grievance. However if you do not wish to submit your passport number your grievance will still be investigated by KPK on an unofficial basis).