

Application to the Independent Project Accountability Mechanism (hereinafter 'IPAM')

1. Who submits the application? Please provide your full name or the name of your organization.

[REDACTED]

2. How did you hear about IPAM?

From colleagues at Bankwatch

3. Do you want to keep your name (or the name of your organization) confidential throughout the process?

Yes

4. Do you feel any fear or risk of possible persecution in response to your appeal to the IPAM?

We prefer not to disclose the names of employees or the organization to avoid potential accusations from residents, the media, the EBRD, or risks of persecution and harassment by government authorities and business entities

5. Country:

Republic of Kazakhstan

6. Please provide your contact information:

[REDACTED]

What is the best way to contact you? WhatsApp

7. Please provide the name or description of the EBRD Project(s) that raises your environmental, social or transparency concerns. If you do not know the name of the Project, you can provide information such as the name of the company responsible for the Project, the location of its implementation, or the nature of the project activities that affect your interests.*

Almaty International Airport expansion (hereinafter referred to as the Project) Location: Kazakhstan
Project number: 51186
Client: JSC Almaty International Airport

Purpose: Provision of a syndicated loan of up to USD 229.4 million to: (i) finance the investment program of Almaty International Airport (MAA), including the construction of a new passenger terminal; and (ii) refinance the acquisition of MAA and its associated fuel company, Venus Trading LLP (VT), by a consortium of investors led by TAV Airports.

The project description published on the EBRD website acknowledges that “as part of the construction of the new terminal, it will be necessary to relocate the existing VIP terminal building.” This building is of historical and cultural significance and is protected by national law.

8. What harm do you think the Project does or may do? * Please provide as much detail as possible.

Actual damage. The Ecological Society believes that the Project has caused irreparable damage to the historical and cultural heritage of Kazakhstan and the city of Almaty, harm to the historical and cultural monument of local significance of the city of Almaty – the VIP terminal building

"Airport (International Airport)" built in 1947. In fact, the monument was destroyed. Neither the airport administration, nor the local executive authorities, nor the international expert [REDACTED], whom we met in person, provided us with monitoring documents confirming its transfer (relocation) or at least the transfer of individual parts of the building. It is likely that environmental damage was caused during the demolition of the old VIP terminal, as there is also no information on the safe disposal of construction and demolition waste.

Description of the demolition of a historical and cultural monument of local significance

Ignoring public opinion

In early November 2022, ^{one} historical and cultural monument of local significance—the VIP terminal building of the airport, constructed in 1947—was demolished. This was carried out despite a decree from the Almaty City Akimat requiring the building to be relocated, as the demolition of historical and cultural monuments of local significance is prohibited under Kazakhstani law. Experts and the public also protested the demolition of the airport's VIP terminal.

The public opinion expressed at the public hearings on February 17, 2021, was ignored by the company JSC Almaty International Airport ². This is confirmed by the fact that public opinion did not influence the decision regarding the VIP terminal. Later, the request of the deputy of the Majilis of the Parliament of the Republic of Kazakhstan [REDACTED] ³ to the Prosecutor General [REDACTED] ⁴ was also effectively ignored. The response states: 'Meanwhile, materials indicating possible unlawful relocation of the "VIP" terminal have been registered with the KUI of the Aviation Transport Prosecutor's Office in Almaty and forwarded to the local Linear Police Department for a procedural decision under Article 203 (Intentional Destruction of a Historical Monument) of the Criminal Code.'⁵. However, no further action was taken by the Linear Police Department. The airport administration responded that the law would be observed.

The presentation titled 'Almaty International Airport Expansion Project,' prepared by TAV Construction—the prospective buyer of Almaty Airport—and attached to the minutes of the public hearings held on February 17, 2021, suggests that the EBRD client sought to obscure its true intentions, namely the demolition of the VIP terminal. ⁶.

Misinterpretation of the law

In the aforementioned presentation and other official project documents, the client fails to use the terminology established by the state standard 'Construction Terminology'

. Technology and organization of construction (SP RK 1.01-102-2014) » ⁷ . According to paragraph 3.702 of SP RK 1.01-102-2014, 'Moving Buildings' is defined as a set of construction works that includes the construction of foundations at a new location; preparation of a track; separation of the building from its original foundation; installation of a rigid metal structure beneath the building's walls and columns; installation of devices to ensure safe conditions for occupants; and the physical relocation of the building along the track using electric winches."

The EBRD, its client, and associated experts use and arbitrarily interpret various terms across multiple documents that do not align with the terminology officially approved by the Republic of Kazakhstan. The most striking confirmation of the client's ignoring of the provisions of Article 29 of the Law of the Republic of Kazakhstan

"On the protection and use of historical and cultural heritage sites" ⁸ and the norms of SP RK 1.01-102-2014 is the use of various arbitrary terms: "movement of a monument", "transfer". In the presentation of the "Almaty International Airport Expansion Project" on pages 26-31, the terms "relocation," "dismantling" are used (p. 27),

"Elements of historical value subject to transfer" (p. 28). The term "Moving buildings" from SP RK 1.01-102-2014 (clause 3.702), in our opinion, was deliberately ignored.

Unfortunately, the Almaty City Akimat also uses different terms in official documents. In paragraph 2 of the Resolution of the Akimat of Almaty dated November 11, 2020, No. 4/492 "On the relocation of ⁹ historical and cultural monuments of local significance

"Airport (International Airport)" states: "To the municipal state institution "Department of Culture of the City of Almaty": 1) when moving, ensure the integrity and safety of the monument; 2) take other measures arising from this resolution." The client can use this to interpret terms and even laws arbitrarily. But the arbitrary interpretation of laws and terms by local authorities does not give the client the right to break the law.

The project description published on the EBRD website states that "as part of the construction of the new terminal, it will be necessary to relocate the existing VIP terminal building." It further states: "A cultural heritage assessment carried out by an international specialist company [apparently in 2022] confirmed that: a) the VIP terminal is not an important cultural heritage; b) the building is a reproducible cultural heritage and its main structural elements can be dismantled and preserved; c) the expertise required to preserve the reproducible elements of the building off-site or to reintegrate them into the new terminal building [is available]."

In this case, legal terms that do not exist in the legislation of the Republic of Kazakhstan were again used, for example, "reproducible" and "non-reproducible cultural heritage". "The concept of reproducible and non-reproducible cultural heritage is defined in the International Finance Corporation's Guide to Cultural Heritage. This defines reproducible cultural heritage as "material forms of cultural heritage" where "particular periods and the cultural values they represent are well represented by other objects and/or structures" ¹⁰ .

Finally, it is stated that "the government supported the key recommendations of the TR8 study, and the client confirmed its commitment to preserving the key structural elements of the VIP building." This statement completely contradicts the content of the resolution of the Akimat of Almaty dated November 11, 2020, No. 4/492 "On

relocation of the historical and cultural monument of local significance "Airport (International Airport)". The decree was not cancelled either before or after the demolition.

Only international treaties ratified by the Republic of Kazakhstan have priority over the laws of Kazakhstan (Constitution of the Republic of Kazakhstan, Art. 4, p. 3). The International Finance Corporation's Guide to Cultural Heritage is not an international treaty.

The use of terminology and principles that are not officially approved and not applied in the Republic of Kazakhstan is either a mistake or deliberately obscures the meaning of the documents. It does not allow us to understand exactly what the client plans to do during the implementation of the Project in relation to the historical and cultural monument of local significance. "Airport (International Airport)".

Violation of national legislation

As a result of the implementation of this project, the following norms of the legislation of the Republic of Kazakhstan were violated:

- Article 376 "Environmental requirements in the field of construction waste management" of the Environmental Code of the Republic of Kazakhstan 2021.
- Article 29 of the Law of the Republic of Kazakhstan "On the protection and use of historical and cultural heritage sites";
- Clause 42) of Article 1 of the Law of the Republic of Kazakhstan "On architectural, urban planning and construction activities in the Republic of Kazakhstan";
- Subparagraph 9) of paragraph 1 of Article 17 of the Law of the Republic of Kazakhstan "On architectural, urban planning and construction activities in the Republic of Kazakhstan" on the liability of entities for violation of legislation on architectural, urban planning and construction activities;
- (SP RK 1.01-102-2014) "Construction terminology. Technology and organization of construction" ¹¹.

Lack of safe disposal of demolition waste

The description of the project, published on the EBRD website, states that only the main structural elements will be preserved; nothing is said about the fate of the building itself. None of the mentioned official documents provide for the post-utilization of the object. Neither the EBRD nor the client consider that the demolition of the 1947 building will generate tons of construction waste. According to paragraph 42) of Article 1 of the Law of the Republic of Kazakhstan "On architectural, urban planning and construction activities in the Republic of Kazakhstan" (with amendments and additions as of 15.03.2025, since 2022 this paragraph has not been amended or supplemented), "post-utilization of an object is a set of works on dismantling and demolishing a capital structure (building, structure, complex) after the termination of its operation (use, application) with the simultaneous restoration and secondary use of regenerable elements (structures, materials, equipment), as well as the processing of elements and waste that are not subject to regeneration." The same is stated in paragraph 3.775 of the above-mentioned SP RK 1.01-102-2014.

According to paragraph 3.972 of SP RK 1.01-102-2014, "demolition of a building: Purposeful, often forced, activity to liquidate a construction site, caused by a number of reasons or physical and moral deterioration of the construction site." See also the Order of the Minister of Industry and Infrastructure Development of the Republic of Kazakhstan dated April 29, 2021

year No. 202 "On approval of the Rules for issuing a decision to carry out a set of works on the post-utilization of objects (demolition of buildings and structures)".

Post-utilization is not provided for by the “Project for the Development of the Infrastructure of the Almaty International Airport”, that is, environmental pollution is allowed. This is a violation of Article 376 "Environmental requirements in the field of construction waste management" of the Environmental Code of the Republic of Kazakhstan of 2021 (as amended and supplemented as of 03/16/2025; since 2022, this article has not been amended or supplemented). This requirement applies to all business entities.

Inadequate risk and impact assessment

Expert assessments for 2022, which are given in the document “Almaty Airport Expansion – VIP Terminal Building. Summary of the cultural heritage site”¹² (hereinafter referred to as the Summary) and mentioned in the project description published on the EBRD website, are not made in accordance with the norms of national legislation. The authors of the Abstract do not deny this fact. “The building is considered a cultural heritage site of local significance by the government of Kazakhstan, which legally protects it. The assessment of cultural significance was conducted in accordance with the guidelines of the ICOMOS Burra Charter, the UNESCO Riga Charter, as well as the standards of the EBRD and IFC. The building is protected by law and is considered a cultural heritage site of local significance by the Government of Kazakhstan”¹³.

The documents listed by the authors of the Abstract do not have priority over the laws of Kazakhstan. But even in the aforementioned “The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance (2013) states: 'The physical location of a place is part of its cultural significance. The building, creation, work or other element of the site must remain in its historical location. Relocation is generally unacceptable unless it is the only practical means of ensuring its conservation.' [The physical location of a place is part of its cultural significance. A building, work or other element of a place should remain in its historical location. Relocation is generally unacceptable unless this is the sole practical means of ensuring its survival] (9.1). That is, the experts arbitrarily interpreted the specified clause, which not only does not allow demolition, but also indicates the undesirability of relocation!

The summary was prepared in June 2022. On November 4, 2022, the VIP terminal building was demolished. We believe that the Summary was needed to end the controversy and justify the demolition. The experts who prepared the Summary arbitrarily interpreted the norms of national legislation and were guided by the provisions of documents that do not have legal force in the Republic of Kazakhstan. According to paragraph 12 of the Regulatory Resolution of the Supreme Court of the Republic of Kazakhstan dated July 11, 2003, No. 5 “On judicial decisions in civil cases”: “The expert’s opinion does not have an advantage over other evidence and is not binding on the court. It must be assessed in conjunction with other evidence.” The experts' conclusion does not cancel the law.

In addition, the design documentation does not contain references to the laws of the Republic of Kazakhstan, which allows us to conclude that “current environmental and social legislative norms and regulatory requirements” were not fully identified and used properly.

Lack of monitoring

In the above-mentioned presentation prepared by TAV construction, “Almaty International Airport Expansion Project”, it is stated that the process of “relocation” of the monument will be supervised and monitored by: local experts in cultural heritage and authorities, and international experts in the field of cultural heritage (p.30). There is no documentary evidence of supervision and monitoring of the process on the websites of the bank's client, the EBRD and even local authorities. "movement" of the monument.

The environmental society has repeatedly approached the EBRD, the airport administration and local authorities with a request to provide data on monitoring the movement of a historical and cultural monument of local significance – the International Airport.

On May 30, 2024, the Ecological Society filed a claim with the Specialized Interdistrict Administrative Court of Almaty against the Almaty City Department of Culture to obtain documentary evidence of the implementation or non-implementation of supervision and monitoring of the process of “moving” the monument. In August 2024, by court order, the Almaty City Department of Culture provided the requested information. It follows from this that the process of “moving” the monument was not monitored.

From the above facts, it can be concluded that from December 2020 to September²⁰²²¹⁴, when the Project was discussed with the public, and further until the complaint was filed in 2025, the EBRD did not monitor the client’s strict compliance with the laws of the Republic of Kazakhstan in the design, implementation and monitoring of the Project. The Environmental Society has repeatedly drawn the EBRD's attention to this violation of its policy.

Evidence of demolition

In February 2023, the President of Almaty International Airport, [REDACTED], announced that the historic building, which previously housed the VIP terminal, “is now being moved piece by piece and its twin is being assembled”¹⁵.

A letter from the Almaty City Department of Culture lists the individual elements of the building to be recreated, stating: 'The building will be reconstructed to preserve the original appearance of the following decorative elements: stained glass window infill; decorative relief panels on the side facades; a multi-profile cornice with ornamental relief around the perimeter; a peshtak; a “stalactite” cornice on the peshtak pylons; three-quarter ornamented columns in the national style at the corners of the pylons; stained glass in the arched opening; a belvedere tower with a spire; and an openwork parapet encircling the entire roof perimeter.’¹⁶.

That is, representatives of the EBRD, the client company, the president of the International Airport, and city executive authorities claim that only individual elements of the VIP terminal were preserved, although they cannot prove this: no materials were provided on monitoring the work carried out, including no evidence of the transfer of individual original decorative elements. They admit that the VIP terminal building built on the new site is its double, but not the original.

Conclusion

As a result of the implementation of a project financed by the EBRD, a historical and cultural monument was deliberately destroyed by the client. The legislation of the Republic of Kazakhstan and the resolution of the Akimat of Almaty dated November 11, 2020, No. 4/492 “On the movement of

historical and cultural monument of local significance "Airport (International Lines Airport)".

It is likely that environmental damage was caused during the demolition of the old VIP terminal, as information proving the safe disposal of construction and demolition waste was not made available to the public.

9. Does the Project affect you directly or personally? *

The ecological society [REDACTED] considers itself to be a legal entity (organization) affected by the Project.

According to Article 2(5) of the Aarhus Convention ¹⁷ : “The public concerned” means the public which is or may be affected by, or which has an interest in, decision-making in matters relating to the environment; for the purposes of this definition, non-governmental organizations promoting environmental protection and which comply with any requirements imposed by national law shall be deemed to be organizations having an interest.” The Ecological Society is registered by the Department of Justice of Almaty and is a non-governmental organization. [REDACTED]
[REDACTED]

The Ecological Society has been monitoring the environmental and socio-environmental situation in the city of Almaty for many years. The organization's focus is on:

- the health condition, safety and well-being of people, their living conditions;
- elements of the environment, namely: air, water, soil, land, landscapes, biological diversity;
- factors affecting the environment, namely: noise, radiation and others.
- *the state of cultural objects to the extent that they are affected by factors influencing the environment.*
- activities that can impact natural elements of the environment and the state of cultural objects.

10. Have you raised your concerns with the EBRD or an EBRD Client?

*

In 2024, the Ecological Society repeatedly approached the EBRD with a request provide data on monitoring the movement of the historical and cultural monument of local significance of the International Airport, in accordance with paragraph 43 of the 2014 ESP.

On 4 February 2025, at the Almaty airport, a meeting was held between the staff of the Ecological Society and [REDACTED], who introduced himself as the person responsible for monitoring on behalf of the EBRD. But [REDACTED] did not provide any documents about the powers he had. Monitoring materials were also not provided. Green Salvation employees inspected the new VIP terminal and took photographs.

On 10 February 2025, the Ecological Society sent letters to the airport administration and the EBRD asking them to inform us when the Ecological Society would be able to receive documents on the results of monitoring the transfer (demolition) of the VIP terminal and on the construction of a new airport terminal, which, as we were informed, were being prepared by [REDACTED]
[REDACTED]: [REDACTED],

On February 11, 2025, a response was received by email from the MAA administration with the following content: “We are reviewing the archives, we will find the necessary document and share it. Let's stay in touch.”

The EBRD has not responded by 19 June 2025. The EBRD's failure to provide environmental information is a violation of the Aarhus Convention, the commitment to which is stated in the 2014 ESP (see above).

11. What do you hope to achieve by contacting the IPAM?

1. Strengthening the EBRD's safeguard policies to ensure:
 - effective and responsible assessment of the risks and impacts of the project, including in terms of compliance with local legislation (the opinion of invited experts should not be taken into account if it contradicts national legislation or international agreements);
 - effective interaction with the public, which involves taking into account the opinions of interested civil society organizations in decision-making;
 - effective monitoring of the activities of the Bank's clients in order to respond in a timely and effective manner in the event of a violation of environmental and social requirements, and to hold them accountable;
 - enhanced control over clients' compliance with national legislation and international conventions
 - inclusion of JSC Almaty International Airport, the Tav Airports group of companies in the list of high-risk clients and considering the identified facts of violation of the law when making subsequent decisions by the EBRD on possible lending to these companies;
 - initiate an investigation into possible corruption that occurred during the demolition of the VIP terminal;
 - initiate an investigation into the possible concealment of information that occurred during the demolition of the VIP terminal.
2. Compensation for damages in the form of:
 - Recognition of the fact of demolition of a cultural monument;
 - Offering an official apology to the public of Kazakhstan;
 - Statements that such things will not be repeated in the future;
 - In order to give a unified architectural appearance to the Almaty Airport, take the necessary measures to demolish or refurbish the abandoned hotel (unfinished construction) on the territory of the Almaty Airport. (What will happen to the unopened hotel on the territory of the Almaty Airport. Publication date: May 30, 2024: [REDACTED] access date: July 3, 2025).
 - Considering that the project is aimed at “growing international and domestic tourism” (Expansion of Almaty Airport. According to the ESIA Report (August 2021, Mott MacDonald Limited, p. 286), in order to preserve a unique natural site located near the border of Almaty city, it is proposed to provide financial support to the Ministry of Ecology and Natural Resources of the Republic of Kazakhstan for the nomination of Ile-Alatau National Park—currently included in the country's tentative list—for inscription on the UNESCO World Heritage List. (<https://whc.unesco.org/en/tentativelists/1681/>).

12. The IPAM has two options for addressing the concerns you have raised.

b) I am attracted to the option of checking compliance with established standards.

13. If you are already familiar with the EBRD Environmental and Social Policy and Access to Information Policy, please list which of its obligations, in your opinion, the EBRD has failed to fulfil in connection with this Project?

Item 34 of the 2014 ESP: "In particular, the EBRD requires its clients to engage with relevant stakeholders on a scale that is proportionate to the potential impact of a project and the level of concern about it. Such stakeholder engagement should be carried out in the spirit and in accordance with the principles 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."

Item 36 of the 2014 ESP: "An integral element of all TR is the requirement to comply with national legislation", as well as one of the points of **Appendix 1 ESP 2014:** "The EBRD does not knowingly finance, directly or indirectly, projects that involve the following: ... activities prohibited by the laws of the country in which the project is being implemented or by international conventions on the protection of biodiversity or cultural heritage."

Item 43 of the 2014 ESP: "The scale of monitoring should be proportionate to the environmental and social impacts associated with the project, including direct investment and FI projects. At a minimum, monitoring requirements and obligations include review of annual environmental and social reports prepared by clients for projects. The EBRD may also periodically review the monitoring information prepared by clients, through visits to project sites by the Bank's social and environmental specialists and/or independent experts."

Clause 7 TR 1 ESP 2014: "In addition, the assessment process should establish: i) the existing environmental and social laws and regulations in the jurisdictions where the project is being carried out, including laws adopted pursuant to the host country's international legal obligations; and (ii) applicable requirements for the implementation of projects."

Clause 20 TR 3 ESP 2014: "20. The Client is obliged to prevent or minimize the generation of hazardous and non-hazardous waste and, to the extent possible, reduce the degree of harm from it. If it is not possible to avoid the generation of waste, but its quantity has been reduced to a minimum, the customer is obliged to reuse, dispose of or recycle the waste into secondary raw materials."

Clause 3 TR 8 ESP 2014: "It also recognizes that all parties need to comply with laws and regulations relating to cultural heritage that may be affected by the project and the host country's obligations under relevant international treaties and agreements."

TR 10 ESP 2014: in terms of disclosing information and involving the public in decision-making on the project.

14. Have you made any complaints to other organisations regarding your concerns about this Project raised in this statement?

The Ecological Society did not file complaints with other organizations. In 2024, the Ecological Society applied to the Specialized Interdistrict Administrative Court of Almaty.

The case of the failure of the Almaty City Department of Culture to provide environmental information on the implementation of the resolution of the Almaty City Akimat.

Description of the factual circumstances of the case

On November 11, 2020, the Akimat of Almaty adopted Resolution No. 4/492 “On the relocation of the historical and cultural monument of local significance “Airport (International Airport)”. It is included in the State List of Historical and Cultural Monuments of Local Significance of the City of Almaty under number 65. The list was approved by the Akimat Resolution of March 17, 2021 No. 1/191. The second paragraph of the resolution states that the Almaty City Department of Culture (hereinafter referred to as the Department) must:

- “1) when moving, ensure the integrity and safety of the monument;
- 2) take other measures arising from this resolution.”

November 28, 2022 The Environmental Society asked the Authority to provide environmental information on what specific measures the Authority had taken to fulfil its obligations.

December 12 a response was received that did not contain the requested information.

October 19, 2023 year, the Ecological Society once again approached the Administration with a request provide documents, confirming its actions on provision of integrity and safety of the monument.

November 10 a response was received from the Administration, which stated that the relocation of the “monument is being carried out by TOO Arkhrest, which has a license for this type of work on the basis of an agreement concluded with a branch of the company TAV Airport Holding... In connection with this, we ask that you contact the above-mentioned organizations.”

April 8, 2024 The environmental society, believing that the Administration had once again failed to provide the requested environmental information, sent a new request.

The administration did not provide a response. Offense

The Administration violated the right of the Ecological Society to access timely, complete and reliable environmental information, as provided for in Article 4 of the Aarhus Convention, Article 13 and Article 17 of the Environmental Code, Article 6, Article 7 and Article 9 of the Law “On Access to Information”.

The environmental society went to court.

May 15, 2024 The Ecological Society applied to the Specialized Interdistrict Administrative Court of Almaty to protect the interests of an indefinite number of persons and the interests of the organization.

Requirements

1. To recognize the failure of the Environmental Information Directorate as an illegal action.
2. To impose on the Administration the obligation to provide environmental information on the measures taken by it to ensure the integrity and preservation of the historical and cultural monument of local significance “Airport (International Lines Airport)”.

July 22 The court ruled that **the failure to provide information to the Ecological Society in a timely manner was illegal** . The response from the Administration, received by the Ecological Society after its appeal to the court, “is a formal reply, since it does not contain information about the actions taken by the defendant to implement the order.”

The court did not satisfy the demand to oblige the Administration to report on the measures taken.

The court explained, firstly, that at the request of the court, “the defendant complied with the plaintiff’s request,

providing him with all the information, documents and materials available to him, confirming the execution of the order in the part assigned to him.” But that's what the defendant claimed. The judge did not see the documents and did not know the contents! Secondly, “the court recognizes as justified the statements of the defendant’s representative regarding the absence of any documents other than those presented to the plaintiff and the court.” This is explained by the fact that “the fire in the building of the Almaty City Akimat, which occurred in January 2022, is a well-known fact, and accordingly, **the defendant’s claims about the loss of documentation, including those confirming the implementation of measures to enforce the resolution, are not questioned .”**

In August 2024, the Office provided the information it had.
The case is closed.

15. Any other information that you believe is relevant to the case.

- Appeal of the [REDACTED] to the EBRD dated January 15, 2021 (Ex. No. 006) and the EBRD's response.
- Appeal of the [REDACTED] to the EBRD dated 17 October 2023 (Ex. No. 066) and the EBRD's response.
- Letters from the [REDACTED] to the EBRD regarding violation of policy in connection with the failure to monitor strict compliance with the laws of the Republic of Kazakhstan during the design and implementation of the Project.
- Photos of the demolition, photos of the new terminal, photos of the 2024 sanitary protection zone and a google map of the original location of the VIP terminal and the new building.

[REDACTED]
July 28, 2025.

- (p. 34) "The EBRD requires its **client's** interactions with relevant stakeholders"

- (TR No. 10, footnote 1) "This TR follows the spirit, principles and objectives regarding disclosure of information and stakeholder engagement provided for in the Access to Information Convention. information, public participation in decision-making and access to justice in environmental matters of the United Nations Economic Commission for Europe" "The EBRD demands from its **client's** interaction with relevant stakeholders" ... "in the spirit and in accordance with the principles of the Convention on Access to Information, Public Participation in the Process decision-making and access to justice in environmental matters."