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KAZAKHSTAN: BEINEU-BOZOY-SAKSAULSK
ROADS - PROJECT FEASIBILITY ASSESSMENT
PR 017140

Environmental and Social Action Plan

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REPORT ISSUE RECORD

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REPORT TITLE	ENVIRONMENTAL AND SOCIAL ACTION PLAN

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Abbreviations and Definitions

ADB	- Asian Development Bank
BBS	- Beineu-Bozoy-Saksaulsk
CDPRP	- Communicable Disease Prevention and Response Plan
CFP	- Chance Find Procedure
DBK	- Development Bank of Kazakhstan
EBRD	- European Bank for Reconstruction and Development
EHS	- Environmental, Social, Health and Safety
ERP	- Emergency Response Plan
ESIA	- Environmental and Social Impact Assessment
ESAP	- Environmental and Social Action Plan
ESMP	- Environmental and Social Management Plan
ESMS	- Environmental and Social Management System
ESP	- Environmental and Social Policy
ESR	- Environmental and Social Requirement
GBVH	- Gender-Based Violence and Harassment
GIIP	- Good International Industry Practice
GMPW	- Grievance Mechanism for Project Workers
GRM	- Grievance Redress Mechanism
IBRD	- International Bank for Reconstruction and Development
IMS	- Integrated Management System
IFI	- International Financial Institution
HMMP	- Hazardous Materials Management Plan
HR	- Human Resources
JSC	- Joint Stock Company
NC	- National Company
OHS	- Occupational Health and Safety
QAJ	- JSC NC KazAvtoZhol
PPE	- Personal Protective Equipment
RoK	- Republic of Kazakhstan
SEP	- Stakeholder Engagement Plan
SMP	- Security Management Plan
SSESMP	- Site Specific Environmental and Social Management Plan
TMP	- Traffic Management Plan

EBRD Environmental and Social Requirements

1	EBRD ESR1: Assessment and Management of Environmental and Social Risks and Impacts
2	EBRD ESR2: Labour and Working Conditions
3	EBRD ESR3: Resource Efficiency and Pollution Prevention and Control
4	EBRD ESR4: Health, Safety and Security
5	EBRD ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Displacement
6	EBRD ESR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
7	EBRD ESR7: Indigenous People (<i>not applicable to this Project</i>)
8	EBRD ESR8: Cultural Heritage
9	EBRD ESR9: Financial Intermediaries (<i>not applicable to this Project</i>)
10	EBRD ESR10: Stakeholder Engagement

1 Introduction

The construction of the 559-km Beineu-Bozoy-Saksaulsk (BBS) Road to Category II technical standards will form part of the Transport Corridor Europe-Caucasus-Asia (TRACECA), transport corridor, facilitating overland trade between China and Western Europe via Kazakhstan. The BBS Road will enhance the transport and logistics potential of the Mangystau and Aktoobe regions by improving the road's technical standards, increasing its capacity, and reducing travel times. As part of the "Centre-West" Transport Corridor, the road will also contribute to the development of modern transport infrastructure, thereby supporting improved regional connectivity and more efficient movement of people and goods.

The European Bank for Reconstruction and Development (the "EBRD" or the "Bank") has considered providing a sovereign-guaranteed loan to JSC¹ National Company "KazAvtoZhol" (the "Company", the "Client", or "QAJ"), a 100% state-owned national road operator in Kazakhstan, to finance the design, construction and maintenance of Lots 1 to 4 (km 0+000 to km 160+000; approximately 161.5 km) of the BBS Road Project, including its components (such as access roads, road maintenance units, and other ancillary infrastructure).

The Bank engaged a consultant (the "Consultant") to undertake the **Environmental and Social Impact Assessment (ESIA) and prepare the full ESIA disclosure package for Lots 1 to 7 (km 0+000 to km 286+000)** of the Project in accordance with the EBRD Environmental and Social Policy (ESP, 2024) and the Environmental and Social Requirements (ESRs). **Under a Reliance Letter agreed between EBRD, the Consultant and the World Bank, the World Bank may rely on these ESIA deliverables, in the same way as EBRD, for its own financing, appraisal and supervision of Lots 5 to 7.**

The Project has been classified as a **Category A** project in accordance with the EBRD ESP, 2024. As such, the Project is subject to a comprehensive ESIA, together with the preparation of associated environmental and social documentation. The ESIA disclosure package will be made publicly available for a minimum period of 120 days prior to the Project being considered for approval by the EBRD Board of Directors.

This Environmental and Social Action Plan (ESAP) has been developed as part of the ESIA package for the Project.

The 559 km BBS Road is financed by the EBRD, the International Bank for Reconstruction and Development (IBRD) / World Bank, the Asian Development Bank (ADB), and the Republic of Kazakhstan, through the Development Bank of Kazakhstan (DBK), with the road divided into four financing sections (lot groups), each allocated to a different financier:

- EBRD: Lots 1 to 4 (km 0+000 - km 160+000),
- IBRD / World Bank: Lots 5 to 7 (km 160+000 - km 286+000),
- ADB: Lots 8 to 10 (km 286+000 - km 410+000),
- DBK: Lots 11 to 14 (km 410+000 - km 559+166).

¹Joint Stock Company

2 Environmental and Social Action Plan

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
1	EBRD ESR1: Assessment and Management of Environmental and Social Risks and Impacts					
1.1	Engage a specialised company (team) to act as the Project Management Consultant (PMC) for the Project. <i>The PMC shall include dedicated, qualified Environmental and Social (E&S) staff with substantial experience in International Financing Institutions (IFIs) financed projects, assigned specific Environmental, Social and Health Safety (EHS) monitoring and oversight roles and responsibilities, and provided with sufficient technical resources to fulfil these functions. At a minimum, the PMC team should comprise four specialists: (i) an environmental, health and safety specialist; (ii) a social specialist with expertise in stakeholder engagement and gender issues, (iii) human resources and labour specialist; (iv) a resettlement specialist.</i>	Compliance with the EBRD ESRs and national E&S requirements. Regular E&S monitoring of the Project.	EBRD ESR1 - Organisational Capacity and Commitment.	Project PMC budget. KazAvtoZhol.	At least 6 months prior to the start of construction activities.	The PMC established, technically equipped, and staffed with qualified E&S staff.
1.2	Strengthen and enhance the qualification requirements for environmental, social (gender), OHS, stakeholder engagement and land acquisition/resettlement specialists specified in the tender documentation and contracts for Construction contractor and Supervision engineer, ensuring that the required expertise, qualifications, experience, and capacity are commensurate with the E&S risks and complexity of the projects.	Enhanced capacity to implement the Project in accordance with applicable E&S requirements.	EBRD ESR1 - Organisational Capacity and Commitment.	KazAvtoZhol, with support from the Consultant.	At the procurement stage.	The Construction contractor and Supervision engineer is staffed with a competent, experienced and adequate number of E&S specialists.

²D - development, I - implementation, A - approval

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
1.3	Ensure that the Construction contractor and Supervision engineer has sufficient qualified personnel to oversee Project implementation, with appropriate expertise in national and international E&S requirements. Roles and responsibilities for environmental and social management, resettlement, biodiversity, cultural heritage, and occupational and community health and safety should be clearly assigned and appropriately scaled to the size and complexity of the Project and its workforce.				Upon signing contracts with the Construction contractor and Supervision engineer.	
1.4	Develop and implement a Project-specific Environmental and Social Management System (ESMS) for the construction and operation phases, covering the E&S roles and responsibilities, management and monitoring of the Company, the Contractors, the Supervision engineer, and the Project Management Consultant (PMC). The ESMS shall include, at a minimum: - Environmental, Social, Health and Safety (EHS) policy and objectives, - Contractor and Supplier Management Procedure to manage and monitor their EHS performance, - Environmental and Social Management Plans (ESMPs), including site-specific ESMPs for the Project, - A framework for monitoring and reporting on E&S performance, including E&S monitoring plans,	Enhanced management of the Project's EHS activities. Continuous improvement of the Project's EHS performance.	EBRD ESR1 - Environmental and Social Management Systems, Environmental Policy	KazAvtoZhol / PMC	D: before the start of construction activities. I: beginning with the mobilisation of the construction contractor and throughout the operation phase.	The ESMS is developed, implemented, and functioning effectively.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	- Procedures for managing and addressing non-compliances, complaints, grievances and accidents, - Change Management Procedure to ensure that any modifications to the Project design, including changes in capacity, location or technology, are subject to an appropriate E&S assessment commensurate with the associated risks. New, altered or newly emerging impacts shall be assessed and mitigated in accordance with the defined materiality threshold and applicable EBRD requirements. Any material changes shall be submitted to and agreed with the Bank prior to implementation, - Stakeholder Engagement Plan (SEP), including the Project-level Grievance Mechanism.					
1.5	Conduct an independent reassessment of the Company's Integrated Management System (IMS) against the current versions of ISO 9001, ISO 14001, and ISO 45001 (which replaced OHSAS 18001), address any identified gaps, and obtain or renew third-party certification as appropriate.	Enhanced management of the Project's EHS activities. Continuous improvement of the Project's EHS performance.	EBRD ESR1 - Environmental and Social Management Systems, Environmental Policy.	KazAvtoZhol / External consultants.	Within 12 months of signing the loan agreement.	Re-certified IMS against the current versions of ISO 9001, ISO 14001, and ISO 45001 standards.
1.6	Maintain the IMS through periodic surveillance audits and timely recertification, and retain valid certification records as evidence of continued compliance.				Secure recertification every three years.	Valid certificates.
1.7	Develop, formally approve and implement the construction phase site-specific ESMPs (SSESMPs) in accordance with the EBRDs ESRs including, but not limited to: - Borrow Pit and Quarry Management Plan,	Minimisation and mitigation of the Project's impacts on the EHS environments.	EBRD ESR1 - Environmental and Social Management Plan. EBRD ESR1-6, 8, 10.	Within the construction contractor budget.	D: before the start of construction activities. I: from the start of construction and	The SSESMPs for the construction phase are prepared and effectively implemented.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	- Traffic Management Plan, - Spoil Disposal Management Plan, - Hazardous Materials Management Plan, - Spill Prevention and Management Plan, - Waste Management Plan, - Occupational Health and Safety Management Plan, - Community Health, Safety and Security Management Plan, - Labour and Working Conditions Management Plan, - Worker Accommodation Management Plan, - Local Employment and Procurement Plan, - Construction Camp Management Plan, including Asphalt and Batching facilities, - Site Reinstatement and Rehabilitation Plan, - Emergency Preparedness and Response Plan, - Biodiversity Management Plan, - Worker Code of Conduct, - Chance Find Procedure, - Air, Water, and Soil Quality Monitoring Plan, - Noise and Vibration Monitoring Plan, - Gender-Based Violence and Harassment (GBVH) Prevention and Response Plan. Update these SSESMPs based on additional E&S assessments, studies, monitoring findings, and other relevant information, and agree the updates with the Supervising engineer, PMC and the Bank.	Improved working conditions and minimized community and occupational health and safety risks.	National E&S requirements. GIP.	Construction contractor to prepare and implement. Supervision engineer to approve. Supervising engineer and PMC to monitor.	throughout the construction phase.	
1.8	As part of the Project ESMS, establish and implement: - A Contractor Management Procedure to manage and monitor their EHS performance,	Ensure effective monitoring of EHS performance during construction activities.	EBRD ESR1 - Contractors. National E&S requirements.	Construction contractor to prepare and implement.	D: before the start of construction activities. I: from the start of construction and	The E&S performance of contractors and suppliers is monitored and deemed satisfactory.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	ESMPs, including SSESMPs, as required for the Project, - Risk-based Supply Chain E&S Assessment and Management Plan, - A framework for monitoring and reporting on E&S and labour performance, including E&S monitoring plans and compliance requirements for contractors and suppliers, - Procedures for managing and addressing non-compliances, accidents and incidents.			Supervision engineer to approve. Supervising engineer and PMC to monitor.	throughout the construction phase.	Management, monitoring and reporting procedures for the PMC to oversee the E&S performance of construction activities are developed and implemented.
1.9	Ensure the systematic implementation and documentation of the inspections and monitoring activities required under the KazAvtoZhol's Regulation for Quality Inspections of Construction, Reconstruction, and Repair Works on Republican Roads, including monitoring of contractors' EHS performance.	Effective E&S monitoring and inspections of road reconstruction, repair and maintenance works undertaken by contractors under KazAvtoZhol-funded projects.	EBRD ESR1 - Contractors. National E&S requirements.	KazAvtoZhol	As specified by the Regulation for Quality Inspections of Construction, Reconstruction, and Repair Works on Republican Roads.	E&S monitoring and inspection reports and checklists are completed and duly followed up.
1.10	Integrate Climate Adaptation Criteria into the Detailed Design: Integrate Climate Adaptation Criteria into the Detailed Design: Ensure that the Design & Build Contractor incorporates critical climate resilience parameters into the final blueprint designs, including: (i) running a 2-D Hydrodynamic Model driven by updated IDF baseline data to resize drainage infrastructure and bridge aprons; (ii) incorporating active hydraulic scour protection (rock riprap aprons and concrete toe revetments) at the km 63+980 and km 148+560 structures; (iii) structurally recalibrating bridge expansion joints and bearing pads to withstand horizontal thermal displacement vectors exceeding +45°C under the mid-century SSP5-8.5 warming	Minimizes the risk of physical asset damage, structural pavement cracking, washout erosion, subgrade settlements, and road overtopping from acute weather events.	EBRD ESR1 - Contractors. EBRD ESR4 - Natural and climate change hazards. Good International Industry Practice (GIIP).	Within the Design & Build Contractor's engineering budget. Contractor to implement. Supervision Engineer and PMC to approve and monitor.	Prior to the formal approval of the Detailed Design and before the commencement of the respective construction works.	The final approved Detailed Design package fully incorporates 2-D hydrodynamic simulation results, upgraded culvert capacities, bridge structural thermal displacement calculations, and certified pavement.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	pathway; (iv) maintaining mandatory engineering parameters for polymer-modified SMA-20 asphalt and 350 g/m² needle-punched geotextiles; and (v) enforcing slope stabilization via 100-150 mm HDPE geocells with hydroseeding on fine sand dune slopes (Km 50-55) and non-woven polypropylene geotextile filter mats under the sub-base drainage layer at Km 115-120."					
1.11	Any new power supply infrastructure developed specifically for the Project shall be screened and assessed to determine whether it constitutes an associated facility in accordance with the EBRD ESP 2024. Once the Project's detailed design has been prepared and the sources of construction materials have been identified, these facilities and sources shall be assessed to determine whether they qualify as associated facilities under the EBRD ESP 2024.	The E&S performance of associated facilities is adequately managed and monitored.	EBRD ESR1 - Associated facilities.	Construction contractor with support of the PMC and Supervision engineer.	Before the start of construction works.	The Project's associated facilities are identified, assessed, and appropriately managed.
1.12	KazAvtoZhol to work with the EBRD and all other Lenders (IBRD/WB, ADB, DBK) to ensure coordination and consistency of E&S requirements and approach across the whole BBS road alignment and the associated infrastructure, including E&S requirements in the tender documents for contractors, supervision of the works during the implementation, operation, and monitoring. <i>This is necessary for both the EBRD project and the Associated Facilities.</i>	Inadequate coordination between KazAvtoZhol, the lenders, contractors, and supervision consultants may lead to gaps in environmental mitigation, monitoring, and reporting.	EBRD ESR1 - Associated facilities.	KazAvtoZhol together with EBRD, IBRD/WB, ADB, DBK	Before the start of procurement process.	Consistent E&S requirements and practices are applied by all lenders financing the BBS road project (EBRD, IBRD/WB, ADB, and DBK) and incorporated into the tender documentation.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
1.13	Prepare the national EIA report based on the Project design documentation, submit it to the State Authorised Body for State Environmental Review and obtain a positive environmental conclusion. Obtain environmental permit(s), including applicable limits and requirements for air emissions, wastewater discharges, waste generation, storage and disposal based on the positive positive environmental conclusion (see point 3.3 of the ESAP).	Regulatory sanctions, suspension of works and reputational risks.	EBRD ESR1 - Environmental and Social Assessment. National requirements.	Specialised consultant with support of KazAvtoZhol.	Before the start of procurement process.	Positive environmental conclusion for the Project design EIA report issued by the State Authorised Body.
1.14	Prepare and submit Annual Environmental and Social reports (AESRs) together with the ESAPs implementation progress and the Project's E&S performance until the loan is repaid. <i>The AESRs shall, among others, include the information requested under Items 3.2, 6.4, and 10.3 of this ESAP.</i>	Timely monitoring and reporting on the Project's E&S commitments.	EBRD ESR1 - Project monitoring and reporting.	PMC with support of the Supervision engineer to develop. EBRD to review and approve.	Annually until the loan is re-paid.	AESRs together with ESAPs implementation status submitted to the EBRD.
2	EBRD ESR2: Labour and Working Conditions					
2.1	Establish a programme for implementing and monitoring non-discrimination and equal opportunity requirements across QAJ and its projects, including gender-disaggregated monitoring and effective communication of confidential GBVH grievance channels.	Reduced risks of discrimination, inequality and GBVH.	EBRD ESR2 - Non-Discrimination and Equal Opportunity. Internal requirements.	KazAvtoZhol / HR department.	Within 6 months of signing the loan agreement.	Programme for implementing and monitoring non-discrimination and equal opportunity requirements are prepared and implemented.
2.2	Communicate remuneration and bonus arrangements, including applicable eligibility and calculation principles, to employees to promote transparency and awareness.	Improved employee understanding of salary and bonus calculation principles.	EBRD ESR2 - Wages, Benefits and Conditions of Work.	KazAvtoZhol / HR department.	Within 3 months of signing the loan agreement. Annually for new employees.	Awareness-raising briefings for employees are conducted and documented.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
2.3	Establish a procedure for collective dismissals requiring documented consideration of alternatives to workforce reduction and, where such alternatives are not viable, preparation and implementation of a collective dismissal plan in line with EBRD ESR2.	Reduced social and labour risks associated with workforce reductions by ensuring relevant alternatives.	EBRD ESR2 - Collective dismissals. National requirements.	KazAvtoZhol / HR department.	Within 6 months of signing the loan agreement.	A procedure for collective dismissals, including the requirement to prepare and implement a collective dismissal plan, is developed and approved.
2.4	Include requirements in contracts with Construction Contractors to manage collective dismissals in accordance with EBRD ESR2, including consideration of alternatives, consultation with affected workers, application of fair and transparent selection criteria, and preparation of a collective dismissal plan where required, and monitor contractors' compliance with these requirements.			KazAvtoZhol, with support from the Consultant.	At the procurement stage.	Collective dismissal regulations are included in contractual documentation.
2.5	Establish a comprehensive Grievance Mechanism for Project Workers (GMPW) aligned with EBRD ESR2 and ensure its availability to all project workers, including self-employed and contractor workers, with provisions for confidentiality/anonymity, clear procedures and timeframes, and systematic communication to workers.	Reduced labour and social risks by providing workers with a confidential, accessible and transparent channel to raise concerns and ensuring grievances.	EBRD ESR2 - Grievance mechanism.	KazAvtoZhol / HR department.	Within 3 months of signing the loan agreement, but before the start of construction activities.	The GMPW is developed, implemented, and accessible to all project workers.
2.6	Ensure that applicable ESR2 requirements are appropriately extended to self-employed workers through their contracts, as well as relevant QAJ policies and procedures.	Improved labour conditions and protections for self-employed workers.	EBRD ESR2 - Self-employed workers.	KazAvtoZhol / HR department	For all new contracts with self-employed workers. Within three months of signing the Loan Agreement.	Contracts with self-employed workers are supplemented with applicable ESR2 requirements.

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2.7	Conduct independent labour audits during the construction phase to verify that the Project complies with the EBRD's labour requirements.	Improved safe labour conditions and worker rights. Compliance with international and national labour requirements.	EBRD ESR2 - Working relationships.	KazAvtoZhol or EBRD to hire an independent labour auditor(s) and commission two labour audits of the Project.	1st audit: immediately before the start of construction. 2nd audit: during the peak of the construction stage.	Labour audit reports accepted by the EBRD. ToR and CVs for the labour auditor(s) submitted and approved by the EBRD.
3	EBRD ESR3: Resource Efficiency and Pollution Prevention and Control					
3.1	Develop and implement Project Greenhouse Gas (GHG) Management Procedure in accordance with the EBRD Protocol for Assessment of GHG Emissions or another internationally recognised methodology acceptable to the EBRD. <i>The Procedure shall include: (i) annual quantification, monitoring and reporting of project-related GHG emissions; (ii) identification and implementation of technically and financially feasible and cost-effective energy-efficiency and low-carbon measures during the design, construction and operation phases; and (iii) assessment of opportunities for the use of renewable energy in Project-related facilities and operations, where relevant to the Project.</i>	Reduces the risk of unmanaged GHG emissions, Supporting the transition to lower-carbon.	EBRD ESR3 - Resource efficiency and circular economy, Greenhouse gas emissions. Good international practice.	KazAvtoZhol with support of PMC to develop. Construction contractors to implement. Supervision engineers and PMC to monitor.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	GHG emissions are quantified annually, cost-effective energy-efficiency and low-carbon measures are identified, implemented and evaluated.
3.2	Include project-related GHG emissions data, covering at a minimum the construction and operation phases, in the AESRs submitted to the EBRD, together with information on implemented GHG reduction, energy-efficiency and low-carbon measures.	E&S reports include comprehensive data on project-related GHG emissions.	EBRD ESR1 - Project monitoring and reporting. EBRD ESR3 - Greenhouse gas emissions.	PMC with support of the Supervision engineer.	Annually until the loan is re-paid.	AESRs include substantiated data on project-related GHG emissions.
3.3	Obtain all required permits, authorizations, and approvals from the relevant state authorities, and ensure ongoing compliance with their	Compliance with national regulatory and permitting framework.	EBRD PR3 - Pollution Prevention and Control.	Construction contractor.	As required by the national regulations.	All required permits have been obtained and registered.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	conditions and requirements, at a minimum including: - Construction permit, - Environmental permit(s), including applicable limits and requirements for air emissions, wastewater discharges, waste generation, storage and disposal, as applicable, - Archaeological conclusion, where applicable, a permit for earthworks within cultural heritage protection zones, - Technical conditions and other sector-specific approvals required for the relocation or protection of utility infrastructure and other engineering communications.	Risk of penalties from the State inspection bodies.	National E&S requirements.			All conclusions and agreements related to the Project's E&S matters have been signed and registered.
3.4	Conduct legal E&S compliance audit of Construction contractors to identify any gaps or discrepancies between the applicable legal requirements, including environmental permits and the E&S requirements established in the contracts, including the ESMP and other project-specific E&S commitments.	Compliance with national regulatory and permitting framework. Risk of penalties from the State inspection bodies.	EBRD ESR3 - Pollution Prevention and Control. National E&S requirements.	PMC with support of the Supervision engineer.	Annually during the construction activities.	Legal E&S compliance audit report.
3.5	Monitor the construction contractors' compliance with the requirements of the environmental permits through monthly E&S inspections conducted jointly by the Supervision engineers and PMCs.			Supervision engineer and PMC.	On a monthly basis throughout the construction period.	E&S monthly inspection reports/checklists.
3.6	Include hazardous substances and materials management requirements in tender and contractual documentation, requiring contractors to minimise and, where feasible, substitute hazardous materials with less hazardous	Reduces the risk of exposure to hazardous materials, spills, contamination.	EBRD ESR3 - Safe use and management of hazardous substances and materials.	KazAvtoZhol, with support from the Consultant.	At the procurement stage.	Hazardous substances and materials management requirements included in tender and contractual documentation.

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	alternatives and to ensure their safe storage, handling, transportation, use and disposal.					
3.7	Monitor Construction contractors' practices to minimise the use of hazardous materials and, where possible, to ensure their safe storage, handling, transportation, use, and disposal.			Supervision engineer and PMC.	On a monthly basis throughout the construction period.	E&S monthly inspection reports/checklists.
3.8	Maximize On-Site Excavation Material Circularity: Develop and strictly enforce comprehensive Topsoil and Spoil Management Plans as part of the site-specific ESMPs (SSEMPs) These plans must mandate: (i) the careful stripping and physical preservation of topsoil for subsequent landscaping/ecological restoration; and (ii) maximizing closed-loop, on-site reuse of excavated subsoil and stones to avoid waste.	Reduces indirect greenhouse gas emissions (Scope 3) from third-party material procurement and transport, and prevents raw material wastage.	EBRD ESR3 - Resource efficiency and circular economy. National environmental legislation.	Construction Contractor to prepare and implement. Supervision Engineer to approve. PMC to monitor.	D: Before the start of ground-disturbing and excavation activities. I: Continuously throughout the construction phase.	Topsoil and Spoil Management Plans formally approved, with material logs and waste transfer notes verifying the maximized volume of re-used excavated materials on-site.
4	EBRD ESR4: Health, Safety and Security					
4.1	Develop and implement project-specific HSMPs for the construction phase that, as a minimum, shall include: - Identification and assessment of OHS risks and appropriate control measures; - Applicable national and relevant IFIs OHS requirements; - OHS roles and responsibilities; - Safe operational procedures for key activities; - Requirements for Personal Protective Equipment (PPE), OHS training, induction and toolbox talks; - Emergency preparedness and response, including first aid and fire safety; - Safe management of hazardous substances and materials;	Effective management of OHS activities. Minimised risks of accidents and incidents.	EBRD ESR4 - Occupational Safety and Health.	Construction contractor to develop. Supervision Engineer to approve. PMC and EBRD - no objection.	Before the start of construction activities.	HSMP is developed, agreed with the Supervising engineer and implemented.

No.	Environmental and Social Action	E&S Risks / Benefits	Requirement (Legislative, EBRD, Best practice)	Resources, Investment Needs, Responsibilities	Timetable ²	Target and Evaluation Criteria for Successful Implementation
	- Incident and accident reporting and investigation procedures; - Regular OHS inspections, monitoring and reporting.					
4.2	Include in the project ESMP a requirement for the preparation and implementation of project-specific Community Health and Safety Management Plan (CHSMP) where project activities may affect communities or sensitive receptors located along or adjacent to the road alignment. <i>The CHSMPs should be proportionate to the identified risks and define specific mitigation, monitoring, emergency response, and stakeholder communication measures.</i>	Management and monitoring of impacts on nearby communities and sensitive receptors.	EBRD ESR4 - Community Health and Safety.	Construction contractor to develop. Supervision Engineer to approve. PMC and EBRD - no objection.	Before the start of construction activities.	CHSMP is developed, agreed with the Supervising engineer and implemented.
4.3	Revise and enhance the EHS monthly monitoring report/checklist template to include project- and location-specific community health, safety and security monitoring criteria and performance indicators, proportionate to the nature and level of project-related risks. <i>The currently used EHS monthly monitoring report template shall be updated to cover, as applicable, pedestrian and community access, construction-related hazards, emergency preparedness and response, public complaints and grievances, incidents and accidents involving community members, and the implementation and effectiveness of community health and safety mitigation measures.</i>	Better monitoring of impacts on nearby communities and sensitive receptors.	EBRD ESR4 - Community Health and Safety.	PMC with support of Supervision engineer.	D: before the start of construction activities. I: from the start of construction and on a monthly basis throughout the construction phase.	EHS monthly monitoring report/checklist is updated.

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4.4	Establish and communicate confidential and accessible grievance channels for women workers and other project-affected persons to safely raise concerns and submit complaints, including complaints related to discrimination, harassment and GBVH. The mechanism should be included in the GBVH Prevention and Response Plan (see item 1.7) <i>The mechanism should provide for confidential handling of complaints, protection against retaliation, clear referral and investigation procedures, and, where appropriate, access to external reporting channels.</i> <i>Information on the available channels should be communicated to workers through induction training, workplace notices, and other appropriate means.</i>	Effective management of GBVH related complaints.	EBRD ESR4 - Gender-based violence and harassment.	Construction contractor to develop. Supervision Engineer to approve. PMC and EBRD - no objection.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	Confidential and accessible grievance channels for women workers and other project-affected persons are established.
4.5	Include in the project ESMP an explicit requirement to develop, implement, and periodically update a Hazardous Materials Management Plan (HMMP) covering the safe procurement, transportation, storage, handling, use, and disposal of hazardous materials, as well as spill prevention and emergency response measures.	Effective management of hazardous materials and minimisation of spills and leakages.	EBRD ESR4 - Hazardous materials safety.	Construction contractor to develop. Supervision Engineer to approve. PMC and EBRD - no objection.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	HMMP is developed, agreed with the Supervising engineer and implemented.
4.6	Consider Good International Industry Practice (GIIP) for the preparation and implementation of Traffic Management Plan (TMP), drawing on lessons learned from other road infrastructure projects implemented in Kazakhstan and internationally. This should include strengthening road safety measures during	Avoid or reduce impact from traffic and maintain safety of population and visitors.	EBRD ESR4 - Traffic and road safety.	Construction contractor to develop. Supervision Engineer to approve.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	The TMP is developed, agreed upon, implemented, and updated as required.

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	construction and enhancing the oversight of TMP implementation by Supervision engineers.			Road Police - no objection.		
4.7	Cooperate with regional and local Road Police departments during both the preparation and implementation of TMPs to improve temporary traffic management arrangements, coordinate traffic control measures, and strengthen the enforcement of road safety requirements within construction work zones.					
4.8	Include in the project ESMPs a requirement for to develop and implement a project-specific Communicable Disease Prevention and Response Plan (CDPRP), where project activities may increase the risk of disease transmission.	Reduced risk of communicable disease transmission among workers and affected communities.	EBRD ESR4 - Exposure to disease.	Construction contractor to develop. Supervision Engineer to approve.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	The CDPRP is developed, agreed with the Supervising engineer and implemented.
4.9	Incorporate communicable disease monitoring into the monthly EHS inspections and verify implementation of disease prevention measures at construction camps, worker accommodation, sanitation facilities, and other locations where workers and local communities may interact.		EBRD ESR4 - Exposure to disease, Worker welfare and accommodation.	Supervision engineer with support of PMC.		Disease prevention measures at construction camps, worker accommodation, sanitation facilities are implemented.
4.10	Ensure that the accommodation camps meet the standards set out in the IFC/EBRD Worker Accommodation Guidance Note.	Improved labour standards and working conditions.	EBRD ESR4 - Worker welfare and accommodation.	Construction contractor.	Before the start of construction phase.	Accommodation camps are equipped with all required facilities and amenities.
4.11	Carry out daily, weekly and monthly inspections and monitoring of the HR practises, as well as working and living conditions at the construction camps and accommodation camps. <i>Points to be monitored should include, among others: work schedule and shift duration, full rest days and shift breaks, availability and conditions</i>			Construction contractor - daily and weekly inspections. Supervision engineer and PMC monthly inspections.	From the start of construction and throughout the construction phase.	Inspection reports/checklists are completed and properly maintained.

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	<i>of sanitary facilities, as well as living conditions in the accommodation camp (freedom of movement, sufficient private space, dining facilities etc.).</i>					
4.12	Strengthen the Company's approach to natural and climate-related hazards by developing a corporate framework for assessing climate and natural hazard risks to the republican road network and integrating the results into road planning, maintenance, emergency preparedness and contractor management. <i>The framework should identify priority hazards and vulnerable road sections, define appropriate prevention and adaptation measures, and establish arrangements for periodic review based on updated climate projections and hazard information.</i>	Reduced risks associated with natural and climate-related hazards.	EBRD ESR4 - Natural and climate change hazards.	KazAvtoZhol with support of external consultants.	Within 6 months of signing the loan agreement.	Corporate framework for assessing climate and natural hazard risks to the republican road network is developed and approved.
4.13	Consider and, where necessary, incorporate the recommendations and mitigation measures set out in the Road Safety Audit (RSA) report into the Project design documentation.	Road safety risks are minimised through the implementation of appropriate mitigation measures.	EBRD ESR4 - Traffic and road safety.	Project design consultants with support of the KazAvtoZhol.	During the Project detailed design stage.	The Project design documentation incorporates the recommendations set out in the RSA report.
4.14	Develop and implement site-specific Emergency Preparedness and Response Plan (EPRP) coordinated with the QAJ emergency arrangements and the relevant local and regional emergency services. <i>The plan shall establish clear procedures for emergency notification, incident location identification, initial response, provision of medical assistance and evacuation, coordination with external emergency services, and communication with affected workers and other</i>	Minimised risks of emergency situations and their E&S, operational consequences.	EBRD ESR4 - Emergency preparedness and response.	Construction contractor to develop. Supervision Engineer to approve.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	The EPRP is developed, agreed with the QAJ and local and regional emergency services.

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	<i>relevant parties. The plan shall be reviewed and updated as necessary.</i>					
4.15	Establish a Dynamic Operations-Phase Climate Resilience Action Plan: Develop, approve, and systematically implement a dedicated Climate Resilience Action Plan. The plan must include standardized procedures to: (i) periodically update regional multi-decadal climate data projections; (ii) monitor long-term physical risks such as clay soil shrinkage, aridity, and wind-driven settlement; and (iii) incorporate operational "lessons learned" from extreme weather events to adaptively adjust asset management protocols.	Secures the dynamic, long-term adaptive capacity of the highway infrastructure asset and manages residual physical climate risks over time.	EBRD ESR4 – Natural and climate change hazards.	KazAvtoZhol with structural operational support from contracted Maintenance Contractor(s).	D: 6 months prior to the completion of the construction phase. I: Transitioning into operations and enforced annually until the loan is fully repaid.	The Operational Climate Resilience Action Plan is integrated into the road management framework.
4.16	Develop an Operational Emergency Response Plan (ERP) for Weather Extremes and Wildfires: The plan must define protocols for: (i) extreme event early-warning systems (covering pluvial flash floods, dust plumes, and black ice); (ii) rapid controlled close-down of service or temporary highway detours; and (iii) safe passenger evacuation and emergency firefighting staging coordination to mitigate open-steppe wildfire confinement risks, (iv) cleaning-up and restoring operations following the event.	Minimizes community health and safety risks, limits the impact of acute structural stranding emergencies, and ensures a rapid recovery and cleanup following an extreme weather event.	EBRD ESR4 - Emergency preparedness and response.	KazAvtoZhol (operational budget allocation). Maintenance Contractor to implement.	D: Prior to the formal commissioning and opening of the road corridor to public traffic. I: Throughout the operation phase (at least one specialized emergency weather simulation exercise per year.	The operational ERP is approved and functional, SOS emergency points/beacons are installed, Annual emergency exercise logs are maintained in the AESRs.
4.17	Implement an Occupational Health and Safety (OHS) Heatwave Policy: Establish a formal extreme temperature OHS policy for all maintenance personnel and sub-contracted crews. The policy must mandate: (i) planning high-exertion maintenance shifts	Eliminates worker heat exhaustion, lowers the incidence of heat strokes among maintenance crews, and maintains safe labour conditions.	EBRD ESR4 - Occupational Safety and Health. National labour legislation codes.	Contracted Maintenance Contractor to supply equipment and manage shifting.	Enforced daily during the warm and hot season (May through September) across every year of operation.	Zero heat-related occupational injuries. Completion of OHS inspection reports, daily checklist verifications, and

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	around meteorological forecasts to proactively avoid heatwave peaks (>35°C and >40°C); (ii) providing climate-adapted PPE (UV-reflective clothing, hats, sunscreens); (iii) ensuring immediate, unhindered access to potable drinking water and active air-conditioned refuge areas; and (iv) establishing legal shift restrictions or mandatory work shutdowns during ultra-extreme heat events (>45°C).			KazAvtoZhol OHS officers to monitor and audit.		logged heatwave toolbox talks.
4.18	Develop and implement a project-specific Security Management Plan (SMP), where security risks are identified, covering security risk assessment, security personnel management, rules of conduct and proportional use of force, training and supervision, incident reporting and investigation, community engagement, and contingency arrangements for changes in the security environment.	Minimised security threats to project workers and project-affected communities.	EBRD ESR4 - Security. National requirements.	Construction contractor to develop. Supervision Engineer to approve.	D: before the start of construction activities. I: from the start of construction and throughout the construction phase.	The SMP is developed, agreed with the Supervising engineer and implemented.
5	EBRD ESR5: Land Acquisition, Restrictions on Land Use and Involuntary Displacement					
5.1	Prepare and implement a Land Acquisition and Resettlement Plan (LARP) in accordance with the Project LARF and EBRD ESR5. Ensure that all Project-related land acquisition and restrictions on land use, including impacts on pastureland, other land uses, assets and improvements, are identified and appropriately compensated or mitigated.	Mitigation of impacts from land acquisition and restrictions on land use.	RoK Law, EBRD ESR5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.	KazAvtoZhol, in coordination with the relevant district Akimats.	LARP to be developed and endorsed prior to commencement of any construction works requiring land acquisition or restrictions on land use. Compensation and other applicable measures to be implemented prior to taking possession of the affected land.	The land acquisition and/or livelihood restoration measures are developed, endorsed and implemented.

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5.2	Strengthen coordination arrangements between QAJ and relevant Akimats for land acquisition and resettlement, including procedures for QAJ to verify compensation outcomes and track land acquisition-related grievances through to closure, ensuring that identified gaps are addressed in accordance with the applicable LARF/LARP and ESR 5 requirements.	Consistent implementation of land acquisition and resettlement requirements and protection of PAPs rights.	EBRD ESR5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.	KazAvtoZhol, jointly with the relevant district Akimats.	Throughout LARP development and implementation.	Coordination arrangements with relevant Akimats established and implemented; compensation outcomes verified and land acquisition-related grievances tracked through to closure.
5.3	Conduct an External Resettlement Completion Audit following full LARP implementation, including document review, site inspections, stakeholder consultations, and verification of applicable livelihood restoration measures.	Ensuring that impacts from land acquisition and restrictions on land use are appropriately mitigated.	RoK Law, EBRD ESR 5 - Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.	KazAvtoZhol.	Upon completion of LARP implementation.	External Resettlement Completion Audit completed, confirming that LARP measures have been fully implemented.
6	EBRD ESR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
6.1	Implement supplementary field biodiversity survey during the appropriate season (April-May), as defined in the Biodiversity Management Plan (BMP), to supplement and verify any insufficient baseline data, confirm the presence and distribution of sensitive, protected, or otherwise important species and habitats.	Improved biodiversity conservation.	EBRD ESR6 - Biodiversity conservation. Guidance note - Environmental and Social Requirement 6: Biodiversity conservation and sustainable management of living natural resources (November 2025). National requirements.	Specialised experts with support of the KazAvtoZhol/PMC.	April-May 2027. Before the start of construction activities.	BMP is updated and agreed with the EBRD. CHA and residual impact assessment sections of the ESIA report are updated and agreed with the EBRD.
6.2	Based on the supplementary field biodiversity survey, update the CHA and residual impact assessment sections of the ESIA report and BMP (if needed) accordingly, and agree with EBRD.					
6.3	Implement the BMP, ensuring that the proposed measures are translated into site-specific			Design company with support of KazAvtoZhol.	During the project design stage.	The BMP is implemented throughout the Project's

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	requirements for the design, construction, and operation phases. Including bio restoration and where necessary biodiversity offsets to ensure No net loss and net gain of identified biodiversity receptors.		Good international practice.	Construction contractor. Specialised experts with support of KazAvtoZhol.	During the construction stage. During the operation stage.	design, construction, and operation stages.
6.4	Include biodiversity monitoring results, implementation status of the BMP, and any adaptive management measures in the AESRs submitted to the EBRD throughout the construction and operation phases, where material and relevant to the Project.			PMC with support of the Supervision engineer.	Annually until the loan is re-paid.	AESRs include biodiversity monitoring results and updates on BMP implementation during the reporting period.
6.5	Establish and implement a mechanism to ensure a consistent and harmonised approach to management of biodiversity impacts across all sections of the Project Road, including the EBRD-financed section and the sections financed by International Bank for Reconstruction and Development, Asian Development Bank (ADB) and Development Bank of Kazakhstan (DBK). The harmonised approach shall, as a minimum, cover critical habitats, Saiga protection and ecological connectivity, wildlife crossings, biodiversity monitoring, construction-phase mitigation and relevant contractor obligations.	Ensure that wildlife corridors used by the Ustyurt saiga population, as well as their habitats, are preserved.	EBRD ESR6 - Biodiversity conservation. Guidance note - Environmental and Social Requirement 6: Biodiversity conservation and sustainable management of living natural resources (November 2025). National requirements.	KazAvtoZhol, ADB and DBK E&S consultants.	During the ESIA studies for the road sections financed by ADB and DBK.	A biodiversity impact assessment is conducted, and appropriate measures are developed for the entire 559 km road alignment, including Biodiversity Action Plans and/or Biodiversity Management Plans that, at a minimum, address the protection of the Ustyurt saiga population. Wildlife crossings are implemented along the entire road alignment.
7	EBRD ESR7: Indigenous Peoples					
	Not applicable					
8	EBRD ESR8: Cultural Heritage					

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8.1	Develop, adopt, and implement Project-specific Chance Find Procedure (CFP) in accordance with national legislation and the EBRD ESR8, and ensure that all contractors and relevant workers are trained in their implementation prior to the commencement of ground-disturbing activities.	Preservation of cultural heritage. Reduction of risk of impacts on known cultural heritage.	EBRD ESR8 - Chance Finds Procedure. Guidance note - Environmental and Social Requirement 8: Cultural heritage (November 2025). National requirements.	Construction contractor to develop and implement. Supervision engineer to approve and follow up.	D: before the start of construction activities. I: during the excavation/earth works.	The CFP is developed, approved and implemented. The Construction contractor's relevant staff is trained.
8.2	Undertake meaningful consultation with affected communities and other relevant stakeholders as part of the Project's SEP, including, where applicable, communities that use, have cultural associations with, or attach traditional, historical, archaeological, or spiritual value to affected cultural heritage. <i>Document and maintain records of all cultural heritage consultations, and ensure that their outcomes are reflected, where relevant, in project design, mitigation measures, archaeological investigations, and cultural heritage management arrangements throughout the Project lifecycle.</i>			Design company with support of KazAvtoZhol. Construction contractor with support of Supervision engineer.	During the project design stage. Before the start of construction activities.	Recommendations from project stakeholders are incorporated into the project design, where relevant. Recommendations from project stakeholders are incorporated into the project SSESMPs, where relevant.
10	EBRD ESR10: Stakeholder Engagement					
10.1	Strengthen the ongoing implementation, monitoring and documentation of stakeholder engagement, including maintaining up-to-date SEPs and ensuring that relevant stakeholder engagement and grievance mechanism information is readily accessible to affected and interested stakeholders throughout the project lifecycle.	Easy access to the SEP and GRM for affected and interested stakeholders.	EBRD ESR10 - Stakeholder Engagement. Guidance note - Environmental and Social Requirement 10: Stakeholder engagement (December 2025)	Construction contractors to ensure that the SEP and GRM are updated and available at construction sites. KazAvtoZhol, with support from the PMC, to maintain the SEP and GRM on the QAJ website.	Throughout the Project lifecycle.	The SEP and grievance mechanism, including confidential communication channels, are kept up to date and are accessible to stakeholders through the QAJ website and at construction sites.
10.2	Ensure that reliable, accessible and confidential communication channels (including GBVH pathways) are available to affected and vulnerable persons to raise complaints and	Ensuring that grievances are communicated and resolved.				

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	grievances, including anonymously where preferred.					
10.3	Ensure that the AESRs provide sufficient evidence of SEP implementation during the reporting period, including details of stakeholder engagement activities undertaken, stakeholders consulted, key issues and concerns raised, responses provided, grievances received and resolved, and any updates made to the SEP in response to stakeholder feedback or changes in project circumstances.	Improved stakeholder engagement transparency and accountability.		PMC with support of the Supervision engineer.	Annually until the loan is re-paid.	AESRs include sufficient evidence of SEP implementation during the reporting period.