



Environmental and Social Impact Assessment for the Kyzylorda Bypass, Kyzylorda-Zhezkazgan Road Project, Kazakhstan

STAKEHOLDER ENGAGEMENT PLAN

Rev 04

Consultancy Services Contract № 2021.002133

July 2021



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Prepared for:

European Bank for Reconstruction and Development

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In cooperation with



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List of Abbreviations

CC	- Complaints Committee
CLO	- Community Liaison Officer
CoR	- Committee for Roads
E&S	- Environmental and Social
EBRD	- European Bank for Reconstruction and Development
EIA	- Environmental Impact Assessment
ESIA	- Environmental and Social Impact Assessment
ESAP	- Environmental and Social Action Plan
GoK	- Government of Kazakhstan
IFI	- International Financial Institution
JSC	- Joint-stock company
km	- kilometre
Ltd	- Limited company
MoM	- Minutes of Meeting
NC	- National Company
NGO	- Non-Governmental Organisation
NTS	- Non-Technical Summary
PIU	- Project Implementation Unit
PR	- Performance Requirement
RoK	- Republic of Kazakhstan
RTA	- Road Traffic Accident
SEA	- State Environmental Appraisal
SEP	- Stakeholder Engagement Plan

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0. Introduction

The Government of Kazakhstan ("the GoK") approached the European Bank for Reconstruction and Development ("EBRD" or "the Bank") to provide a sovereign guaranteed loan to KazAvtoZhol NC JSC¹ ("the Company") to finance the urgent reconstruction of the 220 km section of Kyzylorda-Zhezkazgan Road and greenfield construction of the 14.6 km Kyzylorda Bypass (four lanes).

The reconstruction of 220 km of the 427 km road is categorised as "B" in accordance with the EBRD Environmental and Social (E&S) Policy (2019) and an E&S Due Diligence has been undertaken for that section. The reconstructed road will follow the alignment of the existing road: a two-lane, category III road constructed about 30 years ago.

The construction of the 14.6 km Kyzylorda Bypass ("the Project") is a greenfield development that could result in potentially significant adverse future environmental and/or social impacts and the EBRD has categorised this Project as "A" in terms of its 2019 E&S Policy, which means that a comprehensive E&S Impact Assessment ("ESIA") and associated documents must be prepared, followed by their public disclosure for a minimum period of 120 days.

The Project beneficiary - the Company, was designated by the GoK as the National Operator for the management of highways². The National Operator, in accordance with the Law of the Republic of Kazakhstan (RoK) On Highways, is empowered to organise paid traffic and develop roadside services³. Kyzylorda Regional Branch of KazAvtoZhol NC JSC acts as the Project Implementing Agency ("PIU"), responsible for managing the day-to-day preparation and implementation of the Project.

The Bank has engaged ATMS Solutions Ltd. (Armenia) ("the Consultant") to carry out an Environmental and Social Assessment of the Project ("the Assignment"). Within the Assignment the Consultant prepared the given document - Stakeholder Engagement Plan ("SEP").

The PIU will be responsible for monitoring of implementation of the SEP-related activities in accordance with this SEP and EBRD Performance Requirements (PRs).

The SEP's objectives are to:

- present the national legal framework and the EBRD's requirements pertaining to stakeholder engagement process;
- identify all Project stakeholders, including those who might be considered vulnerable and might need more support during the consultation process;
- develop a stakeholder engagement programme that will be implemented by the Project to ensure that the E&S information on the Project is timely provided and properly communicated to the Project's stakeholders, and the feedback communication channels are available to the them;
- define the means of engaging with the identified stakeholders in a meaningful and culturally appropriate way; and
- propose a procedure or a mechanism for receiving, registering and addressing grievances and suggestions from stakeholders.

¹KazAvtoZhol National Company (NC) Joint-stock company (JSC)

²Decree of the GoK dated July 30, 2013 No. 744 About the National Highway Operator

<https://adilet.zan.kz/rus/docs/P1300000744>

³Official website of the KazAvtoZhol National Company NC JSC. 2021. About the Company <https://ru.qaj.kz/company/>

The SEP is a "living" document and should be regularly reviewed, supplemented, and / or amended as the Project evolves. This SEP as well as its subsequent editions will be disclosed so that all the stakeholders can get familiar with this document.

Restrictions influencing the Company's stakeholder engagement due to the COVID-19 pandemic

Restrictions related to the COVID-19 pandemic, primarily social distancing measures, may force not to use some approaches to stakeholder engagement and consultations. This may lead to the limitations of certain groups from the engagement process, for example, those who do not have access to the Internet or mobile communications. KazAvtoZhol NC JSC should consult with the Ministry of Healthcare of the RoK and its territorial divisions regarding the implementation of stakeholder engagement (in accordance with the requirements of national legislation and the EBRD). This SEP proposes some alternative methods for stakeholder engagement in the context of the COVID-19 pandemic, as recommended by EBRD (**Section 2.2**) and as stated in **Table 4**.

1. Project Description

The main objective of the Project is to improve the road infrastructure of the region, establish alternative transport connection between M32 and A17 highways, reduce the traveling time, reduce the transport costs and air emissions and ensure the road safety issues, including reduction of road accidents⁴.

The new Kyzylorda Bypass starts from the M32 (Samara/Uralsk-Shymkent) highway at point km 1827+472 through the two level transport junction and ends at the intersection of the bypass with the A17 (Kyzylorda-Zhezkazgan) road near the km 24+600. The total length of the road is 14.6 km, while the direct distance between the bypass starting and ending points is 12.8 km.

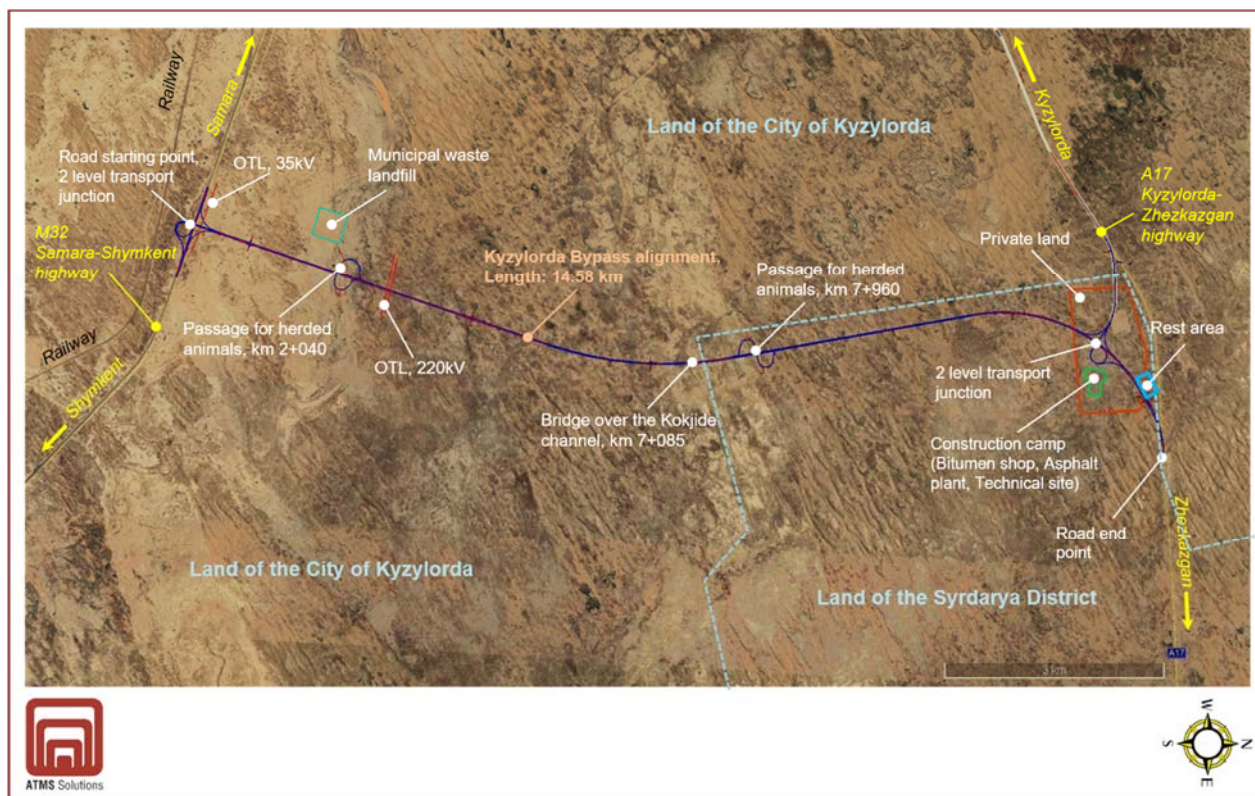
The engineering structures and transport interchanges/components of Kyzylorda Bypass Construction Project are listed below:

- 1) Passway of the local road with overpasses for grazing animals;
- 2) Bridge over the channel Kokjide;
- 3) Two level interchange (connecting A17 highway with the Kyzylorda Bypass);
- 4) Two level interchange (connecting Kyzylorda Bypass with A17 road);
- 5) Rest area, consisting of three zones: parking for vehicles, rest area and sanitary-hygienic facility;
- 6) Storm water discharge system designed to install roadside trays along both sides of the bypass road and engineering structures;
- 7) Outdoor (street) lighting with a total length of lighting network of 38.54 km;
- 8) Concrete ditches for the Fiber-optic telecommunication line along the bypass roadside;
- 9) Road safety elements (road signs, guiding devices, roadside barriers, snow fences, road markings).

The map of the proposed Kyzylorda Bypass with the associated components and neighbouring facilities is presented in **Figure 1**.

⁴It should be noted that the Design Document (2020) for the Kyzylorda Bypass Construction Project also includes the "Reconstruction of Kyzylorda-Zhezkazgan Road km 12+000 - km 24+600 section" component. However, this component is out of the Project scope and is not covered by this SEP.

Figure 1. The map of the designed Kyzylorda Bypass road alignment



To facilitate the Project implementation, it is envisioned to construct the technological earth road in parallel with the Kyzylorda Bypass (to be used during the construction stage) and to arrange a construction site consisted of a bitumen shop, asphalt plant and technical area (located close to the A17 Kyzylorda- Zhezkazgan road). The construction and auxiliary materials will be delivered by the railway up to the Belkol railway station and then by trucks to the Project area and construction site.

The projected traffic intensity along the Kyzylorda Bypass for the 20-year perspective reaches 9,231 vehicles per day for the target year of 2042. The duration of the Project construction stage is 22 months.

2. Legal Requirements Pertaining to Stakeholder Engagement

2.1 National Requirements of Kazakhstan

The key legal acts related to the Environmental Impact Assessment (EIA) procedure and information disclosure, and applicable to the Project are described below.

The **Environmental Code**⁵ of 2007 was the key environmental legal document of the RoK before the new **Environmental Code**⁶ adopted in January 2021 entered into force on 1 July 2021, with some articles coming into effect stepwise.

⁵The RoK Environmental Code dated January 9, 2007 No. 212. <http://adilet.zan.kz/rus/docs/K070000212>

⁶The RoK Environmental Code dated January 2, 2021 No. 400-VI ZRK. <http://adilet.zan.kz/rus/docs/K2100000400#z4470>

A national EIA for the Project (including public consultations) was conducted according to the 2007 Environmental Code, with Article 57 of the corresponding Code stating that publicity of the State Environmental Appraisal (SEA) would be ensured through public hearings and that all interested citizens and public associations would be given the opportunity to express their opinion during the SEA. Articles 57-1 and 57-2 of the Code respectively described the means of public participation in the decision-making process on environmental protection issues and the projects for which it is mandatory to conduct public hearings. The latter also stated that *"local executive bodies, twenty days prior to the holding of public hearings, provide open access to environmental information related to the EIA procedure of planned economic and other activities and the decision-making process for these activities through an Internet resource, as well as using other methods of information"*.

Since the 2021 Environmental Code provides for the public hearings during the national EIA procedure there are no requirements for accounting public opinion during the post-EIA stage, i.e. during the project construction or operation stages.

Article 8 of the **Instruction on the EIA**⁷ elaborates on the accounting public attitudes in the development of the EIA. According to the Instruction, the project sponsor is responsible for organising and accounting public attitudes through public participation in the development and discussion of EIA materials.

The Rules on Access to the Environmental Information Related to the EIA (OVOS) Procedure and Decision-Making Process⁸ determine the content and procedure for access to environmental information related to the procedure of EIA (OVOS) for all interested individuals and legal entities and their participation in the decision-making process on the planned economic and other activities. Interested parties/stakeholders can gain access to the materials of the SEA except for the confidential information (draft EIA; conclusions of external experts on the draft EIA; minutes of public hearings on the draft EIA; written requests from stakeholders on the draft EIA; the conclusion of the SEA) by sending a written request to the authorised body. The latter in accordance with the legislation within 15 calendar days gives a written response indicating the place and time where they can get acquainted with the requested materials.

The Instruction on conducting the Environmental Impact Assessment⁹ defines disclosure process of Project information (environmental and social impacts, risks, etc.) through public hearings, gathering of written proposals and comments from the public as well as through gathering of written proposals and comments through a questionnaire survey of the Project area population.

Pursuant the **Rules for conducting public hearings**¹⁰ the public hearings are conducted through open meetings as well as through surveys.

When arranging an open meeting the project sponsor arranges with the respective local executive body the time and place of public hearings, a preliminary list of attended stakeholders and justifies

⁷Order of the Minister of Environmental Protection of the RoK dated June 28, 2007 No. 204-p on the Approval of the Instruction for Conducting an EIA. <http://adilet.zan.kz/rus/docs/V070004825>

⁸Order of the Minister of Environmental Protection of the RoK dated July 25, 2007 No. 238-p on the Approval of the Rules for Access to Environmental Information related to the EIA Procedure and the Decision-Making Process for Planned Economic and Other Activities. <http://adilet.zan.kz/rus/docs/V070004876>

⁹Approved by the Order of the RoK Minister of Environment № 204-p, dated 28 June 2007, available at <https://adilet.zan.kz/rus/docs/V070004825>

¹⁰Approved by the Order of the RK Minister of Environment № 135-p, dated 07 May 2007, available at https://adilet.zan.kz/rus/docs/V070004687_#z19

the optimum approach for notification (announcements in the media, newsletters, stands, written appeals).

The local executive body endorses the list of attended stakeholders, the notification method, the time and place of holding public hearings, and appoints the person responsible for holding public hearings.

When arranging public hearings through an enquiry the Project sponsor sent a notification to the respective local executive authority. The Project sponsor publishes an announcement in the media notifying about the public hearings. An official appointed by the respective local executive authority gathers the stakeholders' comments and recommendations and sends to the Project sponsor. Then the stakeholders' feedback is reviewed and a protocol of holding of public hearings through enquiry is made up.

The road construction projects are included in the list of economic operations, which design documents are subject of public hearings¹¹.

2.2 EBRD Requirements

EBRD has adopted a set of specific PRs that projects are expected to meet. One of them is EBRD's PR10: Information Disclosure and Stakeholder Engagement that recognises the importance of an open and transparent engagement between the client, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, grievance mechanism, and ongoing reporting to relevant stakeholders. Under PR10, EBRD requires that stakeholder engagement be an ongoing process.

The following elements of stakeholder engagement are applicable to the Project:

- Identification of project stakeholder groups. Identification of stakeholders, including members of the public who could be affected by the Project construction and operation activities;
- Stakeholder engagement process and information disclosure. During this stage, it is necessary to ensure that identified stakeholders are appropriately engaged on E&S issues that could potentially affect them through a process of information disclosure and meaningful consultation. Public disclosure of appropriate information is vital to enable meaningful consultation with stakeholders;
- Meaningful consultation and disclosure. The consultation process will be based on the disclosure of information relevant to the project activities and operations. The consultation process will be undertaken in a manner that is inclusive and culturally appropriate for all stakeholders;
- Grievance mechanism. Maintaining a grievance process by which the general public and other stakeholders can raise concerns, and which will be handled in a prompt and consistent manner.

¹¹Approved through an Order of the RK Minister of Energy No. 240 dated 10 June 2016, available at <https://adilet.zan.kz/rus/docs/V1600014058#z7>

In addition, the EBRD applies the Access to Information Policy (2019) that sets out how EBRD discloses information and consults with its stakeholders in order to provide sufficient information about the environmental and social risks and impacts arising from Projects and to engage with stakeholders in a meaningful, effective, inclusive and culturally appropriate manner consistent with the EBRD's E&S Policy.

In relation to the COVID-19 pandemic, the EBRD issued a briefing note to PR10¹² recommending the use of "alternative methods of disclosure and stakeholder engagement"; in particular: more informative content on project websites, the use of brochures, newsletter distribution via e-mail and messaging applications (e.g. WhatsApp, Telegram), sharing information and receiving feedback on social networks (e.g. Facebook, Instagram), sharing information through mass media, and posting announcements on local information stands. Recommended stakeholder engagement methods include telephone and online surveys and questionnaires, online engagement through social media, engagement through employees living in the locations of the Project sites, and through television and radio broadcasts. This SEP takes into account the EBRD's recommendations and proposes alternative engagement methods (**Table 4**).

3. Existing Stakeholder Engagement Practices and Previous Project Engagement

3.1 Company's Existing Stakeholder Engagement Practice

The Company has an official website - <https://ru.qaj.kz>, where visitors can find Call Center's telephone numbers, including a short number to be used from mobile phones; open line in the form of a chat is also available on the website, where operators can be asked questions online. A Situational Centre is developed on the website's platform where one can find an operative information on highway situations and incidents including highway hazard levels, traffic restrictions¹³. As part of the implementation of measures aimed at increasing transparency and openness, KazAvtoZhol NC JSC invites all active citizens, representatives of public associations and non-profit organisations to participate in the commissioning of the completed highway sections. To participate in the work of the commissioning committee, those who wish must fill out the questionnaire available on the Company's website¹⁴. Also, a Citizens' Reception Schedule by the management of the Company is posted on the website¹⁵.

3.2 Stakeholder Engagement During the National EIA

The stakeholder engagement process within the national EIA was fulfilled in full compliance with the national EIA legislation (see **Section 2.1**). The engagement of public stakeholders at the early EIA stage when the stakeholders' attitude, concerns and recommendations towards the Project components were asked by the Project sponsor (KazAvtoZhol NC JSC) through the official requests sent to the following authorized public institutions:

- Veterinary Directorate of the Kyzylorda region,

¹²EBRD. 2020. Stakeholder engagement (PR10) EBRD briefing note. COVID-19. <https://www.ebrd.com/covid19-consultation.pdf>

¹³<https://ru.qaj.kz/s/>

¹⁴<https://ru.qaj.kz/citizens/>

¹⁵<https://ru.qaj.kz/company/reception/>

- Veterinary Department of Syrdarya district,
- Department of Industrial and Innovative Development of the Kyzylorda region under the Akimat of Kyzylorda region,
- Republican State Institution "Kazgidromet" under the Ministry of Ecology, Geology, Natural Resources,
- Communal State Institution for the protection of historical monuments and culture of Kyzylorda region,
- Republican State Institution "Aral-Syrdarya Basin Inspection for Regulation of the Use and Protection of Water Resources of the Committee for Water Resources under the Ministry of Ecology, Geology and Natural Resources,
- The Committee of Forestry and Wildlife under the Ministry of Ecology, Geology and Natural Resources.

Pursuant the national regulations (EIA instruction as well as Rules for conducting public hearings, see **Section 2.1**) public hearings were held in Kyzylorda city and Syrdarya District. Both public hearings were organized jointly by KazAvtoZhol NC JSC (the Project sponsor) and Department of Natural Resources and Environmental Management of the Kyzylorda Region (an authorized division of the local executive body). The reason to hold two public hearings was that the Project road crosses two administrative units of Kyzylorda Region. As stipulated by the national regulations the public hearings' announcements in Kazakh and Russian languages were published in the print media as well as were made available at the Kyzylorda Region Department of Natural Resources and Environmental Management's web-site. The EIA docs were made available at the Kyzylorda Environmental Department's web-site as well.

The summary of the public hearings is provided in **Table 1**.

Table 1. Stakeholder engagement events during the national EIA procedure

Date	Stakeholder engagement event	Purpose	Location	Summary
18.02.2020	The Project's public hearings for Kyzylorda City Stakeholders	To present the results of the Project design EIA, which may have a significant impact on the environment and public health ¹⁶	Kyzylorda city, the "Friendship Centre"	<p>Chaired by the deputy director of KazAvtoZhol NC JSC Kyzylorda regional branch.</p> <p>Attended by authorized officials of the local executive authority, representatives of Kyzylorda city Akimat, representatives of the special monitoring group for Kyzylorda Region, the representatives of the Project's sponsor, design and EIA organizations. The public hearing was also attended by the local NGOs local business and residents. 37 persons attended the public hearing in total, including 8 women.</p> <p>The key questions or issues raised were about:</p> <ol style="list-style-type: none"> 1) The questions related to the technical solutions among others included: <ul style="list-style-type: none"> • the location of the soil storage area and its distance from the start point of the road, • application of environmentally friendly and cost effective technologies within the project, • the road capacity and installation of stationary posts to determine the weight of vehicles, • the number of settlements along the road, • the reason for construction of passages for herded animals, • alteration of power transmission lines, etc. 2) Commencement and duration of construction works of road/bypass sections. The Project sponsor stated 2021 as a year when the construction works would begin and 2024 - as the expected completion year. 3) Design Contractors. The attendees were interested if there were representatives of design contractors in the City of Kyzylorda and whether they will be present during the construction and installation work on a permanent basis. The Project sponsor assured that during the construction of the road/bypass a permanent supervision of the project from the design contractors would be carried out. <p>One remark and one proposal were received from the special monitoring group for the Kyzylorda Region:</p> <ul style="list-style-type: none"> • The remark was related to the absence of accounts of the Project designer in social networks where one could find information about the public hearing. According to the group: <i>"There is no opportunity to repost messages and tag users. Since at present a publication in a newspaper does not cover a considerable part of the target audience: The people more often use social networks on the Internet"</i>. • The proposal received was to conduct a repeated public hearing with the involvement of a larger audience of stakeholders. The Project sponsor noted that the public hearings were announced and organized fully in line with the national regulations, thus there is no need to organize second public hearings. <p>The key findings:</p>

¹⁶The public hearing's purpose is cited from Article 54 of the EIA Instructions (see **Section 2.1**)

Date	Stakeholder engagement event	Purpose	Location	Summary
				<p>The Project sponsor representatives addressed all the questions remarks and suggestions. Public hearings can be considered valid.</p> <p>The Minutes of Meeting ("MoM") of a public hearing is attached to the 2020 EIA. The MoM includes list of participants of the public hearing, announcements of holding public hearing in the local newspapers as well the screenshot with the corresponding announcement on the official website of State Enterprise Department of Natural Resources and Environmental Management of the Kyzylorda Region.</p>
19.02.2020	The Project's public hearings for Syrdarya district stakeholders	To present the results of the Project design EIA, which may have a significant impact on the environment and public health ¹⁷	Settlement of Terenozek, Syrdarya District The Community Center	<p>Chaired by the deputy Akim of Syrdarya district</p> <p>Attended by authorized officials of the local executive authority, the director of Kyzylorda regional branch of the National center for quality of road assets, the representatives of the Project's sponsor, design and EIA organizations. The public hearing was also attended by the local business and residents. 32 persons attended the public hearing in total, including 8 women.</p> <p>The key questions or issues raised were about:</p> <ul style="list-style-type: none"> • Construction materials applied, • the Project start and end dates, • Vegetation planting along the road. <p>No proposals and remarks were received during the public hearing.</p> <p>The key findings:</p> <p>The Project sponsor representatives addressed all the questions remarks and suggestions. Public hearings can be considered valid.</p> <p>The MoM of the public hearing together with the list of participants are attached to the 2020 EIA.</p>

3.3 Stakeholder Engagement During the ESIA

KazAvtoZhol NC JSC has experience in implementing the IFI's projects and is aware of the corresponding requirements regarding the stakeholder engagement and information disclosure. Main stakeholder engagement events as part of the ESIA are described in **Table 2**.

¹⁷ Ibid

Table 2. Stakeholder engagement events during the ESIA

Date	Stakeholder engagement event	Purpose	Location	Summary
26.03.2021	Initial ESIA consultation with stakeholders	To gain knowledge on the Project details, main stakeholders, their concerns, recommendations, views on the Project	City of Kyzylorda	<p>The consultation meetings were held with the Deputy Head of the Department of Passenger Transport and Highways of the Kyzylorda Region (a department is a subdivision of the regional akimat) and other representatives of state authorities such as Department of Land Cadastre and Division for Registering Land Resources and Preparation of Proposals for the Provision and Withdrawal of Land-plots of the Department of Land Relations of the Kyzylorda Region, Non-Profit State Corporation Government for Citizens JSC of the Kyzylorda Region, Department of Ecology of the Kyzylorda Region, and others.</p> <p>Among the key questions and issues discussed are:</p> <ul style="list-style-type: none"> • The regional authorities stressed that the reconstruction of the Bypass and the Kyzylorda-Zhezkazgan Road was a long-awaited project which most importantly would enable the population of the region to use the road that meets modern safety requirements as well as to increase cargo traffic and reduce travel time; • The local authorities highlighted the social benefits for the local population associated with the implementation of the Project such as creation of new jobs, attraction of local suppliers of construction equipment and materials together with road service companies; • The Consultant pointed out the issues raised at the public hearings conducted during the national EIA procedure such as absence of notifications in social networks. The local authorities assured that information now would be posted on social media accounts as well and links would be provided to where information about the Project in more details could be found; • Land acquisition and any access restriction to pastures were discussed with the representatives of corresponding state authorities, in particular the need to change the land use purpose. The Project envisioned solutions such as passages for herder animals, etc. • Stakeholder identification; the Consultant stressed that at the time of the EIA surveys, a leaseholder of the land plot needed for the Project was not identified and not consulted on replacement or compensation measures, etc. The representatives of state bodies assured to look into this and progress the resolution of this issue.
26.04.2021-28.04.2021	Second ESIA field visit, scoping stakeholder meetings / consultations	To present the information about the Project and discuss potential impacts and concerns, as	City of Kyzylorda, Syrdarya District	<p>The meetings were held with the representatives of KazAvtoZhol NC JSC and Project designer. The key discussion topics included:</p> <ul style="list-style-type: none"> • Project background, perspectives and development of the road infrastructure in Kazakhstan in general and in Kyzylorda Region in particular; • Discussion of the engineering structures and components of the Project, alternative options, supply chain (water, raw materials, backfill materials, etc.), site selection process, land tenure and economic displacement issues, etc.; • Cultural and historical monuments, biodiversity of the Project area and surroundings; • Gender and human resources risks within the implementation stage of the road projects;

Date	Stakeholder engagement event	Purpose	Location	Summary
		well as to gain views and recommendations on possible mitigation		<ul style="list-style-type: none"> Plans for the next days. <p>Further meeting was held with the local farmer. His concerns and recommendations related to the Project activity, as well as the Company's feedback, were as follows:</p> <ul style="list-style-type: none"> Dust may impact on the vegetation of the pasture area and associated with it reduction in the pasture land's quality and territory. Noise and air emission during the construction phase also worried the farmer. The representative of the Project designer explained that during the Project all the necessary mitigation measures would be conducted to minimize negative impacts associated with the Project; Project decisions such as the location of passages for herded animals, installation of the fence along the bypass were also of an interest to the local farmer. The Project designer together with the representatives of KazAvtoZhol NC JSC discussed these technical solutions with him; The local farmer seemed to be interested in new business opportunities to occur after the construction of the bypass such as commercial facilities (shops, cafeteria, refueling stations. etc.). <p>On April 27, 2021, the consultants met with the representatives of state authorities: the Territorial Inspection of Forestry and Wildlife of the Kyzylorda Region, Department of Environment of the Kyzylorda Region, Department of Housing and Communal Services, Passenger Transport and Highways of the Syrdarya District, Administration of Kosshinirau rural district and Amangeldy rural District, etc. as well as with the representative of the leaseholder of the only one leased land plot located on the territory of the projected bypass road. The primary issues discussed included:</p> <ul style="list-style-type: none"> The leaseholder agreed to return the leased agricultural land to the Syrdarya District Akimat and instead to accept and lease an equivalent land-plot of the same area (1,500,000 m²) that would be out of the Project impact area. The representatives of the regional environmental authorities discussed the concerns and suggestions during the national EIA stage in 2020 and had no additional comments regarding the Project implementation. <p>On April 28, 2021, the consultants held a consultation meeting with the officials of the City of Kyzylorda and Syrdarya District akimats. They welcomed the Kyzylorda Bypass Construction Project that would increase the transport flows across the Kyzylorda Region, would improve the road connections and communication between the settlements of the region and would support the regional development. No specific concerns or mitigation recommendations were voiced.</p>

4. Stakeholder Identification and Analysis

4.1 Stakeholder Engagement Approach / Methodology

The identification of stakeholders in relation to the Project was carried out based on the following criteria:

- Impact: the implementation of the Project may significantly affect a certain social group (stakeholders);
- Influence: the social group is able to significantly influence the process of Project implementation;
- Partnership: there are opportunities for building partnerships between the Company and the given social group; and
- Interest: a social group or individuals not necessarily directly affected by the Project may (or may not) show interest in it.

Stakeholder engagement requires the identification of stakeholders considering the above criteria and the definition of appropriate methods for engagement with them.

4.2 Stakeholder Categories and Groups

The Project stakeholders have been grouped into the following two major categories:

- Internal stakeholders representing the organisations that undertake the Project and those who work within them such as management, staff, owners, shareholders, as well as contractors and subcontractors involved in the Project implementation and benefiting from it (investors and shareholders); and
- External stakeholders representing the groups or individuals that are not part of the organisations implementing the Project but are affected in some way by the decisions and actions of such organisations.

The SEP is intended to cover the Company's engagement with external stakeholders.

In order to ensure effective and meaningful engagement, the Project's external stakeholders have been clustered into the following groups:

- Potentially affected parties/facilities;
- Potentially vulnerable groups;
- State authorities;
- Regional/city/district authorities;
- Non-commercial organisations (Non-Governmental Organisations (NGOs), mass media, academia etc.).

4.3 Stakeholder analysis

The interests and / or relation towards the Project of the abovementioned stakeholder groups are analysed in the **Table 3**. Any stakeholder that is not included in the table but wishes to receive

information about the Project and its E&S aspects and impacts can approach the Company (see Contacts in **Section 5**) with a request to be included in the stakeholders register.

Table 3. Stakeholder groups and summary of their interests/relation to the Project

Stakeholders	Interests / Relation
Potentially affected parties/facilities	
Residents of Belkul village and City of Kyzylorda <i>Note: The distance from the Kyzylorda Bypass to the closest residential development is around 10 km (Belkul village).</i>	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> • social diseases as there would be an influx of work force (during the construction stage); • traffic during the construction stage as there would be an additional load on the roads leading to the Project area; • an increase in the risk of road traffic accidents (RTAs) (during the construction stage); • improper waste management resulting in fires, ignitions, etc. during the construction stage and littering along the road during the operation stage; • social tension resulting from competition for jobs at the construction site and for jobs at commercial facilities along the road during the operation stage; • potential disruptions of power supply, wastewater and telecommunication services due to assembling works at the intersection points of the Project with the public utilities and service networks; • possible pressure on medical facilities in case of outbreaks of COVID-19 or other diseases and construction related accidents and injuries. <p>May be interested in:</p> <ul style="list-style-type: none"> • employment opportunities during the construction and operation stages in commercial facilities (refuelling stations, shops, cafeteria, etc.) to be constructed along the Kyzylorda Bypass as well as jobs to conduct maintenance works on the road; • information about the Project, its progress and its E&S impacts; • renting housing to migrant workers as an additional source of income; • opportunities for an increased and quicker transportation of cargo and passengers; • stimulation of the economic growth of the region due to better accessibility and trading opportunities with its neighbouring countries, such as the Russian Federation and Republic of Uzbekistan.
Residents near facilities necessary for the Project construction such as Belkul railway station, which would be used to deliver construction and auxiliary materials	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> • noise, vibration, dust emissions and emissions from internal combustion of vehicles (during the construction stage); • an increase in the risk RTAs (during the construction stage);

	<ul style="list-style-type: none"> increased frequency of congestions on the roads leading to settlements or the roads passing through settlements (during the construction stage); increased load on the roads leading to the corresponding facilities; social diseases if contact is made between citizens and drivers. <p>May be interested in:</p> <ul style="list-style-type: none"> employment opportunities; information about the Project, its progress and its E&S impacts.
Farmers who use nearby lands for pasture of herded animals ¹⁸ (such as Abay 2 farm)	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> noise, dust emissions and emissions from internal combustion of construction machinery and vehicles transporting construction materials (during the construction stage); loss of pasture land and plants (during the construction and operation stages); road traffic accidents involving farmers' herded animals (during the construction and operation stage); Project decisions such as the location of passages for herded animals, installation of fence along the bypass, etc.; social conflicts with the security staff of Construction contractor. <p>May be interested in:</p> <ul style="list-style-type: none"> information about the Project, its progress and its E&S impacts; tracking how their views / suggestions regarding the Project decisions including the location of passages for herded animals, installation of fence along the bypass, etc. have been taken into account; new business opportunities to occur after the construction of the bypass such as commercial facilities (shops, cafeteria, refuelling stations. etc.).
Municipal Solid Waste Landfill located at a distance of 150 m from the planned bypass ¹⁹	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> noise from the operation of construction machinery and vehicles transporting construction materials (during the construction stage); necessity to clean up the litter around the landfill; increase in the load of waste sent to the landfill (during the construction stage). <p>May be interested in:</p> <ul style="list-style-type: none"> providing services to collect, recycle and dispose waste from the construction site and camp;

¹⁸The affected lands are State-owned and the authorized users of the lands are the City of Kyzylorda and Syrdarya District. Only one affected privately-used land-plot was identified and it was leased provided to the private person (land leaser) for temporary paid land use. It is agreed by the Syrdarya District Akimat to replace the affected land-plot by the equivalent one within the same area.

¹⁹Kyzylorda Tazalygy LLP, No.9 Tlendiyev street, city of Kyzylorda, 120018. Tel./fax:+7(7242) 22 38 71.

	<ul style="list-style-type: none"> Project implementation as it would ensure a quicker access to the facility.
Visitors of the ethnographic cemetery located at a distance of 143 m to the left of the planned bypass	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> temporarily restricted access; accidents due to open trenches and other project related accidents (during construction stage); social conflicts with the security staff of Construction contractor. <p>May be interested in:</p> <ul style="list-style-type: none"> Project implementation as it would ensure a quicker access to the cemetery.
Service establishments (catering, accommodation) and retail business in the area	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> higher workload which might lead to the increase of the number of workers (during the construction stage); social diseases as there would be an influx of work force (during the construction stage). <p>May be interested in:</p> <ul style="list-style-type: none"> increasing their revenues; providing catering services at the construction camp.
Small and medium enterprises and their employees (local building materials producers, distributors, local construction companies, rent of construction vehicles and equipment, etc.)	<p>May be potentially affected by:</p> <ul style="list-style-type: none"> higher workload which might lead to the increase of the number of workers (during the construction stage); social diseases as there could be an influx of work force (during the construction stage). <p>May be interested in:</p> <ul style="list-style-type: none"> information about the Project, its progress and its E&S impacts; procurement opportunities related to the Project; Project implementation as there would be a better accessibility and trading opportunities within the region, and with neighbouring countries; opportunities for an increased and quicker transportation of cargo and goods.
Potentially vulnerable Groups	
Women headed families/rural women in general	<p>May be interested in:</p> <ul style="list-style-type: none"> employment opportunities during the construction stage and operation stage in commercial facilities (refuelling stations, shops, cafeteria, etc.) to be constructed along the Kyzylorda Bypass as well as jobs to conduct maintenance works (street cleaning) on the road.
Non-commercial organisations	
National NGOs of environmental and public orientation, such as Public Association "Syr Ecologiya", Public Association "People's Supervision", Association of Legal Entities "Syr Tabigaty", Regional Center for Ecology and Health	<p>May be interested in:</p> <ul style="list-style-type: none"> monitoring the Project progress and tracking how their views / suggestions regarding the Project implementation have been taken into account; positive E&S changes associated with the implementation of the Project.

Protection of the Aral Sea Region, etc. ²⁰	
Scientific, research and educational organisations (universities, schools) such as Qorqyt Ata University ²¹ , KAZECOLOGIYA, Polytechnic Institute, Institute of Natural Science and Agrarian Technologies, etc. ²²	May be interested in: <ul style="list-style-type: none"> information about the Project, its progress and its E&S impacts; participating in the Project consultations/discussions.
National, regional and district media	May be interested in: <ul style="list-style-type: none"> information about the Project, its progress and its E&S impacts; cooperation with the Company on covering its activities, provision of information to the public and other interested parties.
State authorities	
Government of the RoK ²³	Supervises and invests in activities to ensure a competitive transport infrastructure is developed, and new infrastructure projects aimed at increasing the level of service and the speed of transit routes are implemented ²⁴ . In the period from 2021–2025 within the framework of the Nur Otan Party Roadmap a schedule has been developed and the corresponding work is being carried out to bring 100% of republican roads and 95% of local roads to the normative state ²⁵ .
Ministry of Ecology, Geology and Natural Resources of the RoK ²⁶	Implements state policy, coordination of management processes in the areas of environmental protection, development of a "green economy", waste management (except for municipal, medical and radioactive waste), protection, control and supervision over the rational use of natural resources, state geological study of subsoil, reproduction of the mineral resource base, use and protection of water resources, water supply, wastewater disposal, forestry, protection, reproduction and use of wildlife and specially protected natural areas ²⁷ .

²⁰Association of Practicing Ecologists. 2021. Kyzylorda Region's Environmental NGO Contacts.

https://ecounion.kz/?page_id=3278

²¹Official website of Qorqyt Ata University. <https://korkyt.edu.kz/index.php?lang=ru>

²²Directory of scientific - research organizations, educational institutions of Kazakhstan. Kyzylorda Region. https://www.nauka.kz/page.php?page_id=133&lang=1&article_id=643

²³Official Information Source of the Prime Minister of the RoK. <https://primeminister.kz/ru>

²⁴Ibid. News. 06 April 2021. Until 2025, all roads of the republic to be provided with roadside service — Ministry of Industry and Infrastructure Development. <https://www.primeminister.kz/en/news/2025-zhylga-deyin-elimizdegi-barlyk-zholdar-zhol-boy-servisimen-kamtamasyz-etiledi-kr-iidm-632227>

²⁵Ibid.

²⁶Official website of the Ministry of Ecology, Geology and Natural Resources of the RoK. <https://www.gov.kz/memleket/entities/ecogeo?lang=ru>

²⁷Ibid. 2021. Decree of the President of the RoK dated June 17, 2019 No. 17 On measures to further improve the public administration system of the RoK <https://www.gov.kz/legalacts/details/P1900000479?lang=ru#z21>

Ministry of Industry and Infrastructure Development of the RoK ²⁸	Implements state policy in the spheres of industry and industrial development, mining and metallurgical complex, development of local industries, mechanical engineering, natural monopolies in the field of air navigation services and airports as well as in socially significant markets in the field of airport services, highways; etc. ²⁹
Ministry of Agriculture of the RoK ³⁰	Implements state policy in the sphere of the agro-industrial complex, irrigated agriculture and land reclamation, land resources, as well as, within the limits stipulated by the legislation, carries out cross-sectoral coordination of state bodies in the field of activities related to its competence ³¹ .
Other state authorities to various extents related to the Project	The list of state authorities implementing state policies within their competence includes, but is not limited to: <ul style="list-style-type: none"> • Ministry of Finance of the RoK; • Ministry of Economy of the RoK; • Ministry of Healthcare of the RoK, • Ministry of Energy of the RoK, etc.
Committee for Highways of the Ministry of Industry and Infrastructure Development of the RoK ³²	Carries out regulatory and implementation functions, as well as participates in the implementation of the strategic functions of the Ministry in the area of highways ³³ .
Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the RoK ³⁴	Performs the functions of environmental regulation and control ³⁵ .
Committee for Land Management of the Ministry of Agriculture of the RoK ³⁶	Carries out strategic, regulatory, implementation and control and supervisory functions in the field of land management assigned to it by the Constitution, laws, other regulatory legal acts of the RoK and the Regulations on the Committee ³⁷ .
Regional/City/District Authorities	

²⁸Official website of the Ministry of Industry and Infrastructure Development of the RoK.

<https://www.gov.kz/memleket/entities/miid?lang=ru>

²⁹Ibid.2021. Decree of the GoK dated December 29, 2018 No. 936 On some issues of the Ministry of Industry and Infrastructure Development of the RoK and amendments and additions to some decisions of the GoK.

<https://www.gov.kz/memleket/entities/miid/documents/details/adilet/P1800000936?lang=ru>

³⁰Official website of the Ministry of Agriculture of the RoK. <https://www.gov.kz/memleket/entities/moa?lang=ru>

³¹Decree of the Government of the RoK dated April 6, 2005 No. 310 Some Questions of the Ministry of Agriculture of the RoK. https://www.gov.kz/memleket/entities/moa/documents/details/adilet/P050000310_?lang=ru

³²Official website of the Committee for Highways of the Ministry of Industry and Infrastructure Development of the RoK. <https://www.gov.kz/memleket/entities/roads?lang=ru>

³³Ibid.2021. Committee's Regulation. <https://www.gov.kz/memleket/entities/roads/documents/details/1127?lang=ru>

³⁴Official website of the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the RoK. <https://www.gov.kz/memleket/entities/cerc?lang=ru>

³⁵Ibid.2021. Committee's Regulation.

<https://www.gov.kz/memleket/entities/cerc/documents/details/adilet/G1900000005?lang=ru>

³⁶Official website of the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the RoK. <https://www.gov.kz/memleket/entities/land?lang=ru>

³⁷Ibid. 2021. <https://www.gov.kz/memleket/entities/land/about?lang=ru>

Akimat of the Kyzylorda Region ³⁸	<p>In terms of transport infrastructure management, akimat conducts the following activities:</p> <ul style="list-style-type: none"> • Ensures road safety in the relevant area; • Develops and implements measures to organise road traffic; • Provides performance and control over all types of construction, reconstruction, repair, implementation and maintenance of technical means of traffic control on the roads of regional and district significance, streets of settlements; • Manages municipal-owned roads and road enterprises; • Carries out state control in the course of work on the reconstruction, repair and maintenance of regional highways³⁹.
Maslikhat of the Kyzylorda Region ⁴⁰	Local representative body of the Kyzylorda Region, elected by the population of the region.
Akimat of Kyzylorda City ⁴¹	Implements state policy in the spheres of agriculture, entrepreneurship, industry and tourism, transport infrastructure, social protection, etc.
Akimat of the Syrdarya District ⁴²	Ensures the socio-economic development of the Syrdarya District.
Department of Ecology of the Kyzylorda region	The Department is the territorial body of the Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the RoK that performs the functions of environmental regulation and control ⁴³ .
Department of Land Relations of the Kyzylorda Region ⁴⁴	Manages the regulation of land relations in the Kyzylorda Region.
Other departments of the Kyzylorda Region Akimat to various extents related to the Project ⁴⁵	<p>Departments implementing state policies within their competence in the Kyzylorda Region include, but are not limited to:</p> <ul style="list-style-type: none"> • Department of Passenger Transport and Highways of the Kyzylorda Region; • Department of Energy and Housing and Communal Services of the Kyzylorda Region; • Department of Internal Policy of the Kyzylorda region;

³⁸Official website of the Akimat of the Kyzylorda Region. <https://www.gov.kz/memleket/entities/kyzylorda/about?lang=ru>

³⁹Ibid. 2021. Transport Infrastructure. <https://www.gov.kz/memleket/entities/kyzylorda/activities/454?lang=ru>

⁴⁰Official website of the Apparatus of the Kyzylorda Region Maslikhat. <https://www.gov.kz/memleket/entities/maslihat-kzo?lang=ru>

⁴¹Official website of the Kyzylorda City's Akimat. <https://www.gov.kz/memleket/entities/kyzylorda-kzo/activities/directions?lang=ru>

⁴²Official website of the Syrdarya District Akimat. <https://www.gov.kz/memleket/entities/kyzylorda-syrdarya?lang=ru>

⁴³Order of the Executive Secretary of the Ministry of Ecology, Geology and Natural Resources of the RoK dated July 30, 2019 No. 5-P On approval of the Regulations of the Republican State Institution Committee for Environmental Regulation and Control of the Ministry of Ecology, Geology and Natural Resources of the RoK and its territorial bodies. <https://adilet.zan.kz/rus/docs/G1900000005#z180>

⁴⁴Official website of the Department of Land Relations of the Kyzylorda Region. <https://www.gov.kz/memleket/entities/kyzylorda-zher/about?lang=ru>

⁴⁵Official website of the Akimat of the Kyzylorda Region. 2021. Structure. Akimat's Departments. <https://www.gov.kz/memleket/entities/kyzylorda/about/structure/51/1?lang=ru>

	<ul style="list-style-type: none"> • Department of State Architectural and Construction Control of the Kyzylorda Region; • Department of Industrial and Innovative Development of the Kyzylorda Region, etc.
Kyzylorda City Department of Housing and Communal Services, Passenger Transport, Highways and Housing Inspection of the Akimat of the City of Kyzylorda ⁴⁶	Manages the areas of passenger transport and highways, the implementation of housing and communal services and housing stock.
Other city departments of the Akimat of the city of Kyzylorda to various extents related to the Project ⁴⁷	<p>Departments implementing state policies within their competence in the city of Kyzylorda include, but are not limited to:</p> <ul style="list-style-type: none"> • City Department of Construction; • City Department of Land Relations; • City Department of Entrepreneurship, Industry and Tourism, etc.
Syrdarya District Departments of the Syrdarya District Akimat to various extents related to the Project ⁴⁸	<p>Departments implementing state policies within their competence in the Syrdarya District include, but are not limited to:</p> <ul style="list-style-type: none"> • Syrdarya District Department of Construction, Architecture and Urban Planning; • Syrdarya District Department of Agriculture; • Syrdarya District Department of Land Relations, etc.

4.4 Stakeholder Engagement Programme

The Stakeholder Engagement Programme (**Table 4**) is designed to ensure the most effective engagement with all identified stakeholders, to create and maintain respectful relations between the Company and stakeholders, and to prevent possible conflicts.

The Programme covers the design and construction stages and should be revised and updated at least within one year after beginning of the construction stage and then prior to commissioning the Project facilities. It provides a specific action plan with the distribution of responsibilities and a timeline for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should also be updated.

In case of adverse circumstances (epidemic or pandemic), all events requiring gatherings / major meetings should, if possible, be conducted online using alternative engagement methods (see **Section 2.2** and the Stakeholder Engagement Programme below).

⁴⁶Official website of the city of Kyzylorda. Department of Housing and Communal Services, Passenger Transport, Highways and Housing Inspection. <https://www.gov.kz/memleket/entities/kyzylorda-kzo/about/structure/departments/leadership/2856/1?lang=ru>

⁴⁷Official website of the Akimat of the city of Kyzylorda. 2021. Structure. <https://www.gov.kz/memleket/entities/kyzylorda-kzo/about/structure/16/1?lang=ru>

⁴⁸ Official website of Syrdarya Akimat. Structure. <https://www.gov.kz/memleket/entities/kyzylorda-syrdarya/about/structure/16/1?lang=ru>

The Company will keep track of all engagement activities performed in a Stakeholder Engagement Log, which will include management forms, minutes of meetings and all relevant material used or prepared for the engagement activity (announcements, posters, brochures, presentations, attendees sheet, pictures, etc.). The Stakeholder Engagement Log (**Annex 2**) must be updated once every three months to include the data related to the stakeholder engagement activities/events (mostly conducted by the Construction contractor/s) held within the reporting (past) quarters.

Table 4. Stakeholder Engagement Programme

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
1	PROJECT DESIGN STAGE						
1.1	Develop and launch the Project's webpage on the Company's corporate website	All stakeholders	E&S Information about the Project, : FAQ leaflets on the Project's E&S impacts and mitigations, SEP (including the grievance mechanism, address, contacts, etc.)	Upon signing of the Loan Agreement between the Company and the EBRD and then regularly or when the Project news are available	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Project's webpage on the Company's corporate website https://ru.qaj.kz	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc.
1.2	Adoption and disclosure of the Project's E&S documents: Environmental and Social Action Plan (ESAP), SEP, and Non-Technical Summary (NTS)	All stakeholders	Final Draft SEP, ESAP, and NTS (in English and Russian)	Upon approval of the E&S documents by the EBRD and the Company (disclosed and kept accessible onwards)	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Project webpage on the Company website, Hard copies at: Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc. Sending links to the project documents to the interested stakeholders through email campaigns

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
1.3	Establishment of a grievance mechanism and notification of the public on the established grievance mechanism	All stakeholders	SEP, notification, information bulletins	Established upon signing of the Loan Agreement between the Company and EBRD and maintained onwards	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Project webpage on the Company website Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district	To include in the grievance mechanism remote grievance handling methods such as numbers in messengers e.g. Telegram, WhatsApp, IMO, etc.
1.4	Disclose the contact information of the person responsible for the implementation of the SEP and managing the grievance mechanism (community liaison officer or CLO) For contact details see Section 5 .	Potentially affected parties Other stakeholders	Notification, information announcement	Upon signing of the Loan Agreement between the Company and the EBRD and keep disclosed onwards	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Project webpage on the Company website Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district	To include the CLO's number in messengers such as Telegram, WhatsApp, IMO, etc.

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
1.5	Media coverage of the Project progress, planned activities, achievements and any relevant E&S news	All stakeholders	Announcements in the newspapers, news channels, magazines about the Project's scope and technical measures envisioned, FAQ leaflets on the Project's E&S impacts and mitigations, press releases as news appear, announcement about public hearings / consultations	Upon signing of the Loan Agreement between the Company and the EBRD and then regularly or when the Project news are available during the Project life-cycle	CLO of the Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Respective media channels / means (mirrored at the Project's webpage)	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc
1.6	During the design process discussions with the potentially affected and vulnerable social groups (or their representatives)	Affected social groups (socially vulnerable population, people with disabilities) of the city of Kyzylorda (Kosshinirau Auyl Sub-district), Belkul village	Notifications, presentations, press releases / news, bulletins	Prior to the construction stage	CLO and the relevant staff of the Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village	Conduct thematic meetings in a remote / online format (video and chat conferences, live broadcasts, etc.)

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
1.7	Communication of potential job opportunities and business opportunities	Residents of the region, service establishments and retail business, small and medium enterprises in the region	NTS, grievance mechanism, vacancies, tender announcements	Prior to construction and as the need for goods or services arises	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Newspapers, radio, internet, local job centres, state procurement web-site / tender announcements	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc
2	PRE-CONSTRUCTION STAGE						
2.1	Notification on the commencement of construction works	Focus on: Residents of the city of Kyzylorda, Belkul, farmers using the Project site adjacent areas as pastureland, visitors of the ethnographic cemetery, Municipal Solid Waste Landfill. Other interested parties	Notifications, information bulletins, TV, social media, press releases / news	Prior to the commencement of construction works	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Project webpage on the Company website Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
2.2	Informing the public on the traffic safety measures to be applied during the construction period	Residents of the city of Kyzylorda and Belkul village and any other villages through which the Project transport will drive (focus on the areas along the public roads)	Presentation materials, bulletins	Prior to the construction works	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Local media channels. Notification boards at the residential areas crossed by the Project construction transport	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc.
2.3	Installation of information boards with contact details of the CLO and the Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Residents of the city of Kyzylorda and Belkul village, visitors of the ethnographic cemetery, farmers using the Project site adjacent areas as pasture-land, Municipal Solid Waste Landfill	Information boards	Prior to the construction works	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district Construction sites	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc.

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
2.4	Assigning the Contractors' CLO	Officials and residents of the City of Kyzylorda, Belkul, Abay and Dosan settlements Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Information boards and bulletins, notifications, social media accounts of Construction contractor (Facebook, Twitter, Instagram, etc.)	Prior to the construction works	Project Construction contractor/s	Akimat offices of the Kyzylorda Region and City of Kyzylorda Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Construction camp	Information shared on the social media accounts of Construction contractor such as Facebook, Twitter, Instagram, etc.
2.5	Holding informative meetings/discussions in the City of Kyzylorda, Belkul, Abay and Dosan settlements to present and discuss the Project's EHS impacts, risks and opportunities as well to make the local stakeholders aware of grievance redress principles applied within the Project.	Officials and residents of the City of Kyzylorda, Belkul, Abay and Dosan settlements, farmers using the Project site adjacent areas as pasture-land, local business	Mass media, information boards and bulletins, notifications, social media/network accounts of the Construction contractor and Kyzylorda Regional Branch of KazAvtoZhol NC JSC (Facebook, Twitter, Instagram, etc.)	Prior to the construction works (during the mobilization period)	Project Construction contractor/s (CLO) in consultation with the Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Akimat offices of the City of Kyzylorda, Belkul, Abay and Dosan settlements	Information shared on the social media/network accounts of the Construction contractor and Kyzylorda Regional Branch of KazAvtoZhol NC JSC (Facebook, Twitter, Instagram, etc.)

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
2.6	Prepare Frequently Asked Questions Leaflet outlining: (a) Project summary, (b) EHS impacts, risks and opportunities, (c) mitigations already adopted/to be implemented, (d) other questions asked during the Stakeholder engagement events in 2020 and 2021.	Officials and residents of the City of Kyzylorda, Belkul, Abay and Dosan settlements and Syrdarya district, farmers using the Project site adjacent areas as pasture-land, local business, NGOs	Mass media, information boards and bulletins, leaflets, social media/network accounts of the Construction contractor and Kyzylorda Regional Branch of KazAvtoZhol NC JSC (Facebook, Twitter, Instagram, etc.)	Prior to the construction works (during the mobilization period)	CLO of the Project Construction contractor/s in consultation with the CLO of the Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Akimat offices of the City of Kyzylorda, Belkul, Abay and Dosan settlements Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Construction camp	Information shared on the social media/network accounts of the Construction contractor and Kyzylorda Regional Branch of KazAvtoZhol NC JSC (Facebook, Twitter, Instagram, etc.)
3	CONSTRUCTION STAGE						
3.1	Installation of the boxes with the Public Grievance forms for suggestions and complaints	Potentially affected parties; other stakeholders	Grievance forms	Simultaneously with the start of the site preparation works; the boxes to be checked twice a week	Kyzylorda Regional Branch of KazAvtoZhol NC JSC, CLO	Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district Construction sites	To use messengers such as Telegram, WhatsApp, IMO, etc. To receive grievances

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
3.2	Keeping a record of the received grievances (suggestions and inquiries) in the specific logbook(s)	Potentially affected parties; Other stakeholders	Grievance (Suggestion and Inquiry) Logbook	Throughout the Project cycle	CLO	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	To register grievances received through messengers such as Telegram, WhatsApp, IMO, etc. And social media accounts such as Facebook, Twitter, Instagram, etc.
3.3	Provision of updates on the Project's status / progress	Affected parties; Regional / City / District Authorities and state authorities; NGOs Other stakeholders	Project's progress publications, radio and TV announcements	Throughout the construction stage, at least quarterly	Kyzylorda Regional Branch of KazAvtoZhol NC JSC, CLO, Akimats of the Kyzylorda Region, city of Kyzylorda, Syrdarya District	Project webpage / Company website Office of Kyzylorda Regional Branch of KazAvtoZhol NC JSC Akimat offices of the Kyzylorda Region, city of Kyzylorda, Syrdarya District Administration offices of the Kosshinirau Auyl Sub-district, Belkul village and Amangeldi Auyl Sub-district	Information shared on the social media accounts of Kyzylorda Regional Branch of KazAvtoZhol NC JSC such as Facebook, Twitter, Instagram, etc.

No	Activity	Target Group	Information Materials	Timeframe	Responsible party	Means of communication/ location	COVID-19 restrictions related communication measures
3.4	Organisation of meetings and consultations with the stakeholders on the topics raised by the stakeholders, whenever necessary	Any stakeholders that raise issues (specific attention to the potentially affected parties)	Specific information depending on the topics of interest	Throughout the Project	Kyzylorda Regional Branch of KazAvtoZhol NC JSC, CLO, Akimats of the Kyzylorda Region, City of Kyzylorda, Syrdarya District	Various locations depending on the originator and types of questions	Conduct thematic meetings in a remote / online format (video and chat conferences, live broadcasts, etc.)
3.5	Report on engagement activities quarterly to the Client's CLO so the Client can update SEP on quarterly basis (update will include mostly disclosure of the Stakeholder Engagement Log)	Kyzylorda Regional Branch of KazAvtoZhol NC JSC	Relevant reports and Stakeholder Engagement Log	On quarterly basis starting from the construction works	CLO of the Project Construction contractor/s	Email or cloud storages	Email or cloud storages

5. Grievance Mechanism

In order to enable the potentially affected or any other interested stakeholders to submit their grievances and/or suggestions about the Project's activities the Grievance Mechanism is set up by the Company. It is based on the existing Grievance Mechanism applied by KazAvtoZhol NC JSC and supplemented by additional measures in order to meet the EBRD requirements.

The Grievance Mechanism relies on the "Guidelines for grievance mechanism for environmental and social protection measures of the road sector projects" approved by the Committee for Roads (CoR) in 2014⁴⁹. The Grievance Mechanism includes two levels of complaint management under the leadership of the CoR: Complaints Committee (CC) at the regional (Kyzylorda Region) and central levels (Nur-Sultan); and both CCs are chaired by managers responsible for the overall operation of the Grievance Mechanism and its effectiveness and timely implementation.

The contact details of the CCs at central / regional levels are listed below, and the contact person at the regional level serves as the CLO for the Project:

KazAvtoZhol NC JSC (Head Office)	
Name:	Garyshzhan Nagmanov
Position:	Manager of the 1-st category of Loan management
Address:	Office 3501, 10 Kunaev str., Nur-Sultan, Kazakhstan
E-mail:	garyshzhan.nagmanov@gaj.kz
Telephone/ Telegram, WhatsApp	+ 7 701 055 06 55
Kyzylorda Regional Branch of KazAvtoZhol NC JSC	
Name:	Aliakbar Myrzabai
Position:	Head of Quality Control and Acceptance Department
Address:	18 Zheltoksan str., Kyzylorda, Kazakhstan
E-mail:	aliakbar.myrzabay@gaj.kz
Telephone/ Telegram, WhatsApp	+ 7 701 174 86 05

Grievances and proposals can be submitted to the Company in writing using the example of Public Grievance Form provided in **Annex 1**. Such forms will be published in Kazakh and Russian in electronic format on the Company's website and/or Project's webpage, and they will also be available in printed form near the boxes for grievances and appeals located in the Company's office, offices of the akimats, at the Project construction sites, etc.

Grievances received by phone, e-mail, mail, text messages (SMS), or messages in instant messengers or social media accounts will also be registered and considered. Grievances can also be submitted anonymously; however, it is recommended that contact details be provided so that the Company can provide a written response to the sender of the grievance.

According to the national legislation, appeal of an individual and (or) a legal entity, for the consideration of which it is not required to obtain information from other subjects, officials, or an on-site check, is considered within fifteen calendar days from the date of receipt⁵⁰. The appeal of

⁴⁹As described in the SEP for the Kyzylorda to Zhezkazgan Road Rehabilitation Project dated June 21, 2021.

⁵⁰Law of the Republic of Kazakhstan dated January 12, 2007 No. 221 On the Procedure for Considering Appeals from Individuals and Legal Entities. https://adilet.zan.kz/rus/docs/Z070000221_#z37

an individual and (or) a legal entity, for the consideration of which it is required to obtain information from other subjects, officials, or an on-site check, is considered and a decision is made on it within thirty calendar days from the date of receipt by the subject, official. In cases where additional study or verification is required, the review period is extended by no more than thirty calendar days, which is communicated to the applicant within three calendar days from the date of the extension of the review period⁵¹.

All the grievances addressed to the Company will be recorded in a Grievance (and Proposals) Log, which should be maintained and analysed throughout the Project life-cycle.

6. Monitoring, Evaluation and Reporting

Successful stakeholder engagement depends on continuous effort, performance monitoring and evaluation, and adapting to changed conditions and stakeholder information needs. In order to successfully organise, implement, evaluate, and report on the stakeholder engagement activities, central / regional CLOs will be responsible for these processes (the contact details are provided above). The following indicators will be used for monitoring and improving stakeholder engagement performance in support of the Project implementation:

- The SEP is developed, up to date, and available to the public for review/commenting;
- Actions listed in the SEP are completed in full and as scheduled;
- The topics that were discussed and the questions that were raised during the public consultations;
- Number of stakeholders' comments and suggestions received through various feedback channels;
- Number of stakeholders' grievances and claims received;
- Number of publications on the Project implementation process in local, regional, and national media;
- Key categories of grievances received by the Company or its contractors (employment, permanent or temporary land use, environmental issues, labour relations, etc.);
- Number of grievances resolved within the maximum established timeline;
- Number of grievances remaining unresolved.

The SEP should be periodically evaluated by KazAvtoZhol NC JSC in order to identify activities that might need any corrective and/or preventative measures with the purpose to improve the efficiency of its performance. In such cases the SEP should be updated and shared with the public with the amendments made.

The results of the stakeholder engagement process will be analysed monthly and quarterly, and a summary of the analysis will be included in the annual E&S reports submitted to the EBRD.

⁵¹Ibid.

Annex 1. Example Public Grievance Form

Public Grievance Form

Reference No. (for internal purpose)

Full name:

First name _____

Last name _____

☐ I request not to disclose my identity and contact details without my consent

Contact information

☐ By Post: Please provide mailing address:

Please mark how you wish to be contacted (mail, telephone, e-mail)

☐ By telephone: _____

☐ By e-mail: _____

Preferred Language for communication

☐ Kazakh

☐ Russian

☐ Other, please specify _____

Description of Grievance

Date of Incident/Grievance

☐ One-time incident/grievance (date _____)

☐ Happened more than once (how many times?)

☐ On-going (currently experiencing problem)

What would you like to see to resolve the problem?

Signature:

Date:

Annex 2. Template of Stakeholder Engagement Log

Note: the log can be maintained in the Excel format.

ID/No	Engagement Activity	Participants	Stakeholder Category	Date	Location	Initiated by	Number of participants	Purpose of Engagement	Topics discussed ad issues raised	Minutes of Meeting
1										
2										
3										
...										