



## **Stakeholder Engagement Plan**

Almaty International Airport, Kazakhstan

September 2025

**List of Acronyms**

ALA	Almaty International Airport
ATM	Air traffic movements
CCTV	Close Circuit TV
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence Assessment
ESIA	Environmental and Social Impact Assessment
GoK	Government of Kazakhstan
GRC	Grievance Review Committee
HVAC	Heating, ventilation and air conditioning
IFC	International Finance Corporation
LARF	Land Acquisition and Resettlement Framework
NTS	Non-Technical Summary
PR	Performance Requirement
PS	Performance Standards
SEP	Stakeholder Engagement Plan
SPZ	Sanitary Protection Zone
TAV	TAV Airport Holdings

## Contents

<b>1. Introduction - Requirements for and Purpose of the Stakeholder Engagement Plan .....</b>	<b>3</b>
<b>2. Project Background and Description .....</b>	<b>4</b>
2.1 Background.....	4
2.2 Project Timeline .....	6
2.3 Legal Framework.....	6
<b>3. Stakeholder Identification and Analysis .....</b>	<b>7</b>
3.1 Identification of Stakeholders.....	7
<b>4. Past Stakeholder Engagement.....</b>	<b>13</b>
4.1 Airport Terminal Project 2020 to 2024 .....	13
4.2 Noise Insulation Programme (NIP) .....	16
4.3 Sanitary Protection Zone (SPZ) and Public Safety Zones (PSZ) .....	17
<b>5. Stakeholder Engagement Programme .....</b>	<b>17</b>
<b>6. Resources and Responsibilities .....</b>	<b>21</b>
<b>7. Grievance Mechanism .....</b>	<b>22</b>
<b>8. Monitoring and Reporting .....</b>	<b>26</b>
8.1 Monitoring.....	26
8.2 Reporting .....	26
<b>Appendices .....</b>	<b>27</b>
Regulations and Requirements .....	27
Grievance Form .....	31
Grievance Register .....	32
Figure 1. Layout of Almaty International Airport.....	4
Figure 2. Grievance Management Flow Chart .....	25
Table 1: Main Parties Involved in the Project .....	5
Table 2. Stakeholder Identification .....	8
Table 3. Summary of the stakeholder engagement process for the previous 2020 to 2025 construction activities .....	13
Table 4. Information disclosure methods used which included COVID-19 considerations ....	15
Table 5. Summary of 7 September 2025 public consultation feedback and responses .....	18
Table 6. Stakeholder Engagement Program .....	19
Table 7. Contact Details for Grievances.....	23

## 1. Introduction - Requirements for and Purpose of the Stakeholder Engagement Plan

This document is the updated version of the Stakeholder Engagement Plan (SEP) prepared originally in 2021 at the outset of a project to construct a new international terminal at the Almaty International Airport (ALA). The original SEP has undergone various updates, the last of which was in May 2025. This update covers the airport Master Plan and covers the plans until 2030.

In accordance with European Bank for Reconstruction and Development (EBRD's) Environmental and Social Requirement (ESR) 10 and the International Finance Corporation (IFC's) Performance Standard 1, this SEP outlines how communication with identified stakeholders will be handled throughout project preparation and implementation, including the grievance procedures envisaged. This SEP documents how consultation will be carried out with different groups in the community, identifying what measures will be implemented to remove barriers to participation.

IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Market<sup>1</sup> states that "a good SEP should:

- Describe regulatory, lender, company and / or other requirements for consultation and disclosure;
- Identify and prioritise key stakeholder groups;
- Provide a strategy and timetable for sharing information and consulting with each of these groups;
- Describe resources and responsibilities for implementation stakeholder engagement activities; and
- Describe how stakeholder engagement activities will be incorporated into a company's management system."

This SEP has therefore been prepared to fulfil the above requirements.

The SEP should be considered a live document and will be regularly reviewed and further updated as required to reflect the Project's needs for further engagement with stakeholders during the Project lifecycle, including prior to the Project major phases, any new or changed operations, modifications in the Project design, or if new stakeholders are identified.

---

<sup>1</sup> Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Market, 2017



## 2. Project Background and Description

### 2.1 Background

Almaty International Airport is the largest international airport in Kazakhstan and is situated 12km north-east of central Almaty City. It is bordered by a mix of open land and residential settlements. The airport is located north-east of the Turksib neighbourhood, north of the settlement of Guldala, north-west of Almerek and Panfilovo. Some of these residential areas are within Almaty City and others are within Turksib District, in the wider region of Almaty.

The airport has been operational since 1947 at which time it was in civil/military use. The airport currently consists of two parallel runways, apron areas (comprising taxiways and aircraft parking stands), helipads, and associated facilities and infrastructure. These include car parks, a wastewater treatment facility, further buildings (such as for storage, mechanical engineering, air traffic control, hangars, fire station and offices), and storage areas. The airport fuel farm, with associated rail sidings and above-ground pipework, is located within the northern area of the airport. The previous terminal building was constructed in 2004 after a fire destroyed the previous terminal building during the late 1990s.

Figure 1. Layout of Almaty International Airport



ALA recently completed the construction of a new international terminal, which officially opened in June 2024. Alongside this development, the existing terminal was upgraded and repurposed as a domestic terminal, with additional improvements made to related infrastructure such as highway alterations. The terminals are expected to serve approximately six million passengers annually, making these upgrades beneficial to passengers and to airport staff.

A broader Master Plan has since been developed for ALA, which is designed to accommodate projected growth in airport service demand between 2025 and 2050. The new developments which are the focus of this SEP correspond to Phase 1 of five planned phases.

The Project components planned to be developed during the next five years, are intended to address immediate capacity needs while establishing the foundation for subsequent development. The phased approach allows for infrastructure expansion to be aligned with evolving demand forecasts and ensures flexibility in long-term planning. The main components of Phase 1 of the Master Plan (The Project) are:

- Full depth re-construction of main runway
- New taxiway
- New cargo apron
- Full depth re-construction of existing VIP apron
- New de-icing pad
- Rehabilitation of parking stands
- New in-flight catering facility
- Fuel farm storage expansion and improvements to existing fuel farm
- Domestic terminal renovation
- New drainage and wastewater treatment system
- New head office and training centre
- Aerodrome and ground handling village
- New landside and airside warehouses
- Other improvements

The main parties involved in the Project are listed in Table 1 below.

Table 1: Main Parties Involved in the Project

Position	Organisation
Project Sponsor	TAV Airports Holding
Regulators	Almaty City and Talgar District Akimats and respective departments Aviation Administration of Kazakhstan Airport Commission
Prospective International Lenders	EBRD <a href="https://www.ebrd.com">https://www.ebrd.com</a> IFC <a href="https://www.ifc.org">https://www.ifc.org</a> EDB <a href="https://eabr.org/en/">https://eabr.org/en/</a> DEG <a href="https://www.deginvest.de/">https://www.deginvest.de/</a>
Consultants	Shaneco and SE Solutions (Lenders' E&S Advisor) WSP (Lenders' Technical Advisor (LTA)) Mott MacDonald Limited (Environmental and Social Impact Assessment (ESIA) Consultant) EcoSocio Analysts (Local Sub-consultant, appointed by ESIA Consultant) Frekans (Noise Consultant)

## 2.2 Project Timeline

The stakeholder engagement process began in 2020, at the outset of the work to deliver the new international terminal. It continued throughout all stages of the work, from project preparation and throughout the construction phase until its opening in 2024.

Phase 1 of the Master Plan project is now in its preparation phase and therefore engagement has continued to ensure stakeholder feedback is captured as new plans and designs are developed. Phase 1 is due to be completed by 2028. Phase 1 is intended to address immediate capacity needs while establishing the foundation for subsequent development. The phased approach allows for infrastructure expansion to be aligned with evolving demand forecasts and ensures flexibility in long-term planning.

## 2.3 Legal Framework

The applicable legal requirements to stakeholder engagement, public consultation and disclosure are set out in Appendix A and outlined below. EBRD's ESR 10<sup>2</sup> requires that *"for projects that are likely to be associated with adverse environmental and/or social risks and impacts, the client will develop and implement an SEP or an equivalent documented process, proportionate to the nature and scale or the risks, impacts and development stage of the project. For any project that requires an Environmental and Social Impact Assessment (ESIA), the SEP will apply the disclosure and consultation requirements"*.

ESR10 contains the following provisions:

- SEP: Development of a SEP in order to outline how communication with identified stakeholders will be handled throughout project preparation and implementation;
- Information disclosure: Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the project;
- Meaningful consultation: If employees and/or affected communities will or may be exposed to significant risks or adverse impacts from the project, meaningful consultation will be undertaken in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the project proponent to consider and respond to them; and
- Grievance mechanism: The project proponent will need to be aware of and respond to stakeholders' concerns related to the project in a timely manner. For this purpose, an effective grievance mechanism to receive and facilitate resolution of stakeholders concerns and grievances will be established.

In addition, IFC guidance sets out the below principles for stakeholder engagement, in that it should be:

- be targeted to those most likely to be impacted and involve all representatives of local communities (including women, aged people, children, etc.);
- be initiated at an early stage to scope key issues and have an effect on project decisions;
- be free of external manipulation, interference, or coercion, and intimidation;
- be informed as a result of the adequate dissemination of information in advance;
- be based on timely, actual, understandable and accessible information available in the language preferred by the affected communities;
- incorporate two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- be documented and include clear mechanisms for responding to people's concerns, suggestions and

---

<sup>2</sup> EBRD Environmental and Social Requirement 10 – Stakeholder Engagement, 2024

grievances in a timely manner;

- incorporate where appropriate and feasible, feedback into project or programs design and reporting back to stakeholders; and
- be ongoing as required during the life of the project.

### **3. Stakeholder Identification and Analysis**

#### **3.1 Identification of Stakeholders**

In accordance with the EBRD and IFC requirements regarding stakeholder engagement, ALA previously and in an ongoing manner identifies various individuals and groups who are affected or likely to be affected (directly or indirectly) by the Project (affected parties) or having an interest in the Project (other interested parties). The identified stakeholder groups are presented in Table 2.

As Phase 1 of the Master Plan is underway, the stakeholder list has been updated and will continue to be revisited and updated throughout this, and subsequent stages.

Recognising the importance of meaningful engagement, ALA will continue to focus on maintaining relationships, addressing ongoing concerns, and providing transparency with regards to its activities and performance.



Table 2. Stakeholder Identification

Stakeholder Group	Stakeholders	Details
<b>Key Stakeholders</b>		
Local communities subject to noise and traffic impacts	<p>Properties in communities along air traffic routes, especially those with known exposure to high noise levels which are being targeted by the noise insulation programme</p> <p>Local businesses (commercial, industrial and agriculture) along the air traffic routes</p> <p>Properties and businesses near to and along the access roads used by airport users and airport staff</p>	Communities of Almerék, Guldala, Turksib and Panfilovo
Local communities within the safety zones/areas	Properties within the proposed Public Safety Zone (PSZ) / Sanitary Protection Zones (SPZ).	Local businesses (industrial, commercial and agricultural) as well as residential properties.
Non-governmental Organisations (NGOs) with cultural heritage interests <sup>3</sup>	Local residents and cultural heritage activists.	<p>ICOMOS Kazakhstan (Monuments Preservation Association) <a href="http://www.icomos.org">www.icomos.org</a></p> <p>Initiative groups "Archcode Almaty" <a href="http://www.archcode.kz">www.archcode.kz</a></p> <p>Let's Protect Almaty <a href="https://www.facebook.com/groups/101045316913046/">https://www.facebook.com/groups/101045316913046/</a></p> <p>Protect Kok-Zhailau</p> <p>ALMATY is a beloved city</p> <p>Alma-Ata is my home</p>

<sup>3</sup> These groups were particularly interested in the 2021 ESIA and 2022-2024 construction activity in which a cultural heritage building was affected. In the Phase 1 activities, no cultural heritage impacts have been identified.

Stakeholder Group	Stakeholders	Details
		Almaty Public Council Green Salvation
Organisations and charities supporting vulnerable community groups	Households who receive government support, and those with illnesses, poor house conditions, households with large number of dependents such as elderly people and children, and those living in poverty, and the organisations that represent them.	Asar Ume <a href="https://asarume.kz/#contact">https://asarume.kz/#contact</a> Public Association “Voluntary Society of Disabled People of Turksib District” (+7 (727) 236-76-00, +7 (727) 235-34-18) Disabled Persons Society «ALTYN TIME” Republic coordination union protecting rights of persons with disabilities
PSZ/SPZ Working Group	Public authorities and institutions that participate in the PSZ/SPZ Working Group.	Public authorities and institutions that participate in the PSZ/SPZ Working Group include: <ul style="list-style-type: none"> <li>• Civil Aviation Committee of the Ministry of Transport of the Republic of Kazakhstan</li> <li>• Sanitary and Epidemiological Control of the Ministry of Health of the Republic of Kazakhstan</li> <li>• Sanitary and Hygienic Control and Supervision of Industrial, radiation-hazardous and Municipal facilities, the Ministry of Health of the Republic of Kazakhstan</li> <li>• Department of Sanitary and Epidemiological Control on Transport of Sanitary and Epidemiological Control of the Ministry of Health of the Republic of Kazakhstan</li> <li>• Department of Informational and Communication Platform “Electronic Government” of Ministry of Digital Development, Innovations and Aerospace Industry of the Republic of Kazakhstan</li> <li>• Department of Single State Cadaster of Real Estate of the State Corporation (optional)</li> <li>• Department for Land Cadastre and of the Committee for Land Management of the Ministry of Agriculture</li> <li>• Department for Aerodromes and Land Service, Chief Aviation Inspector of “Aviation Administration of Kazakhstan” (optional)</li> <li>• Land Relations Department of Almaty region</li> <li>• IFC</li> </ul>

Stakeholder Group	Stakeholders	Details
		<ul style="list-style-type: none"> <li>EBRD</li> </ul>
Employees of ALA	Employees and their representatives, trade unions and airport emergency services.	Airport offices, trade union office
Temporary construction workers	Workers of contractors, subcontractors and service providers	The construction companies and their subcontractors and service providers are not currently fully known. To date, YDA (a Turkish international construction contractor) is the only one that has been selected. Over the coming months, others will be identified.
Commercial operators within ALA	Airport operators, taxi drivers, commercial tenants and their workers.	Airport commercial department
National, regional and local governments, authorities and regulators	Public authorities and regulators	<p>Government of the Republic of Kazakhstan</p> <p>RK Ministry of Transport <a href="http://www.miid.gov.kz/en">http://www.miid.gov.kz/en</a></p> <p>RK Ministry of Culture and Sport <a href="https://www.gov.kz/memleket/entities/mks">https://www.gov.kz/memleket/entities/mks</a></p> <p>RK Ministry of Defence <a href="https://www.gov.kz/memleket/entities/mod?lang=ru">https://www.gov.kz/memleket/entities/mod?lang=ru</a></p> <p>RK Ministry of Employment and Labour <a href="https://www.gov.kz/memleket/entities/enbek?lang=ru">https://www.gov.kz/memleket/entities/enbek?lang=ru</a></p> <p>RK Ministry of Health <a href="https://www.gov.kz/memleket/entities/dsm?lang=ru">https://www.gov.kz/memleket/entities/dsm?lang=ru</a></p> <p>Sanitary and Epidemiologic Service (Department)</p> <p>Committee of Civil Aviation subordinate to the RK Ministry of Transport <a href="https://www.gov.kz/memleket/entities/aviation?lang=ru">https://www.gov.kz/memleket/entities/aviation?lang=ru</a></p> <p>JSC "Aviation Administration of Kazakhstan"</p> <p>Airport <a href="http://www.caakz.com/ru/">commissionhttp://www.caakz.com/ru/</a></p> <p>Almaty Region Akimat <a href="http://zhetyysu.gov.kz/">http://zhetyysu.gov.kz/</a></p> <p>Almaty City Akimat <a href="https://www.gov.kz/memleket/entities/almaty?lang=ru">https://www.gov.kz/memleket/entities/almaty?lang=ru</a></p> <p>Talgar District Akimat <a href="https://www.gov.kz/memleket/entities/zhetyysu-talgar?lang=ru">https://www.gov.kz/memleket/entities/zhetyysu-talgar?lang=ru</a></p>

Stakeholder Group	Stakeholders	Details
		<p>Iliy District Akimat <a href="https://www.gov.kz/memleket/entities/zhetysu-ile?lang=ru">https://www.gov.kz/memleket/entities/zhetysu-ile?lang=ru</a></p> <p>Green Economy Authority of Almaty <a href="https://www.gov.kz/memleket/entities/almaty-eco?lang=ru">https://www.gov.kz/memleket/entities/almaty-eco?lang=ru</a></p> <p>Akimat of Almaty District Sanitary Epidemiological Service <a href="https://www.gov.kz/memleket/entities/departament-kkbtu-almaty?lang=ru">https://www.gov.kz/memleket/entities/departament-kkbtu-almaty?lang=ru</a></p> <p>Department of Architecture and Urban Development of Almaty Region <a href="https://www.gov.kz/memleket/entities/almaty-ugask?lang=ru">https://www.gov.kz/memleket/entities/almaty-ugask?lang=ru</a> <a href="http://saulet.zhetisu.gov.kz/">http://saulet.zhetisu.gov.kz/</a></p> <p>Tourism and Foreign Affairs Department of Almaty City <a href="https://www.gov.kz/memleket/entities/almaty-tourism?lang=ru">https://www.gov.kz/memleket/entities/almaty-tourism?lang=ru</a></p> <p>Police Department of Almaty Region <a href="http://mvd.gov.kz/portal/page/portal/almo/MAIN">http://mvd.gov.kz/portal/page/portal/almo/MAIN</a></p> <p>Turksib district akimat of Almaty <a href="https://www.gov.kz/memleket/entities/almaty-turksib?lang=kk">https://www.gov.kz/memleket/entities/almaty-turksib?lang=kk</a></p> <p>Guldala Rural District Akimat <a href="https://www.gov.kz/memleket/entities/zhetysu-talgar?lang=ru">https://www.gov.kz/memleket/entities/zhetysu-talgar?lang=ru</a></p> <p>AlmatyGenPlan <a href="https://almatygenplan.kz">https://almatygenplan.kz</a></p> <p>Almaty Development Centre <a href="https://almatydc.kz">https://almatydc.kz</a></p> <p>Republican State Enterprise "Kazrestavratcia" under the Ministry of Culture and Sport <a href="https://kazrestavratciia.kz/index.php?lang=ru">https://kazrestavratciia.kz/index.php?lang=ru</a></p> <p>Local environmental authorities <a href="https://eco-almaty.kz">https://eco-almaty.kz</a></p>
International lenders	IFC, EBRD, Deutsche Investitions - und Entwicklungsgesellschaft (DEG) and the Eurasian Development Bank (EDB)	<p>IFC <a href="http://www.ifc.org">www.ifc.org</a></p> <p>EBRD <a href="http://www.ebrd.com">www.ebrd.com</a></p> <p>DEG <a href="http://www.deginvest.de">www.deginvest.de</a></p> <p>EDB <a href="http://www.eabr.org">www.eabr.org</a></p>
<b>Other Stakeholders</b>		
Airport Users	Travel passengers and their families,	Airport website and notice boards <a href="http://www.alaport.com">www.alaport.com</a>

Stakeholder Group	Stakeholders	Details
	friends or driver	
NGOs	A number of NGOs may be interested in discussing the environmental aspects of the Project including but not limited to the Regional Centre of Ecology and Health Protection, Green Salvation, Ecological Fund of Kazakhstan and WWF Kazakhstan.	Posadiderevo.kz <a href="http://posadiderevo.kz">http://posadiderevo.kz</a> AirVision.kz <a href="https://airvision.kz">https://airvision.kz</a> Association of Environmental organisations of Kazakhstan <a href="https://aeok.kz">https://aeok.kz</a> Clean Air Almaty <a href="https://airkaz.org/almaty.php">https://airkaz.org/almaty.php</a> EcoUnion Tabigat <a href="https://ecounion.kz/?page_id=3278">https://ecounion.kz/?page_id=3278</a> Protect Kok-Zhailau Green Salvation <a href="http://esgrs.org">http://esgrs.org</a>
Mass media outlets	Regional and local media.	KazTAG <a href="https://kaztag.kz/ru/">https://kaztag.kz/ru/</a> Zakon.kz <a href="https://www.zakon.kz">https://www.zakon.kz</a> Kazinform, <a href="http://kazinform.kz">http://kazinform.kz</a> Nur.kz <a href="http://nur.kz">http://nur.kz</a> Delovoy Kazhakstan <a href="https://dknews.kz">https://dknews.kz</a> Vremya <a href="http://www.time.kz">www.time.kz</a>
Local institutions	Local hospitals, local schools and universities.	Voyennyi Klinicheskiy Gospital' Mo RK Poliklinika No.28 City Clinical Hospital Schools No.44 and 32 Civil Aviation Academy

If you are a stakeholder who has not been identified in the table above and would like to be kept informed about the Project, please contact the Project at the address provided in Chapter 6.



## 4. Past Stakeholder Engagement

### 4.1 Airport Terminal Project 2020 to 2024

#### Preparation phase 2020 to 2021

Over the last five years, ALA has developed a close working relationship with the relevant ministries, regional, municipal and local authorities focused on the previous construction activities which were completed in 2024. For instance, the previous contractor TAV consulted local authorities regarding the proposed development option and as a result the Almaty City Akimat established a Working Group which incorporated all relevant departments of the Almaty City Akimat. The EPC Contractor (TAV Construction) and the local design team were also involved within this Working Group.

Options for the ALA expansion project were presented and discussed with the Akim of Almaty and the President of Kazakhstan in 2020.

The national EIA process for that project was completed, with expert review finalised in August 2021. Public consultations were conducted in line with national regulations. Because it was during the Covid pandemic, the public consultation meetings needed to be online. They were held in December 2020 and February 2021. Adverts were placed in Kazakh and Russian in the local newspaper ("V vashi ruki") and the website of the Green Economy Authority of Almaty (<https://www.gov.kz/memleket/entities/almaty-eco?lang=ru>) one month prior to the event. Over 120 participants, including community members and NGOs, attended these events.

The key concerns raised by the communities and NGOs were mainly associated with the relocation of the VIP terminal and its cultural heritage value.

Extensive consultations were held with "Kazrestavracia" authority under the RK Ministry of Culture and Sport and international advisors on the proposed relocation of the VIP terminal building and its cultural heritage value. A permit to relocate the VIP terminal building was granted later that year based on received recommendations from the national and international cultural heritage experts and advisors.

Other concerns raised during consultations included compensation for lost trees and green hedges, bird protection, and noise and vibration impacts on nearby communities during construction. Proposals for transportation modelling were also discussed to address airport access issues, such as parking, queues, and public transport accessibility. The project incorporated mitigation measures into its design to address these concerns, and construction management practices were implemented to minimise or prevent noise and vibration disturbances.

Table 3. Summary of the stakeholder engagement process for the previous 2020 to 2025 construction activities

Date	Event	Summary
28 December 2020	Initial public information disclosure event held virtually	To inform stakeholders of the project and the loss of the OVIPT.
17 March 2021	First Meeting with TAV, Lenders, Project Team, and LTA	Weekly meetings initiated to monitor progress and alignment with requirements.
25 March 2021	Initial Public Consultation Event	Stakeholder reassurances provided, and feedback gathered through an online questionnaire.
June 2021	Extensive consultation meetings to address queries	Meetings discussed potential relocation options of the VIPT.

	and concerns of the OVIPT	
6–8 April 2022	Project Team Visit to Almaty Airport	Site walk-over and closing meeting to address stakeholder concerns.
4 July 2022	Phase 2 Public Consultation (30 days)	Conceptual Design published; 63 comments collected.
24 June–4 July 2022	Focus Groups Organised by Community Liaison Officer (CLO)	Sessions held with students, passengers, and architects; 87 comments gathered.
20 July 2022	Hybrid Public Consultation Event	Stakeholders discussed two proposed conceptual design options.
29 July 2022	Meeting with Lenders' Technical Advisor	TAV presented two additional designs for review.
6 September 2022	Phase 3 Public Consultation	Draft Final Design and Construction Method Statement published; FAQ document shared.
12 September 2022	Initial Public Consultation Event	Justification for construction methods presented.
30 September 2022	Public Consultation Meeting on Mitigation Measures	Mitigation measures and opportunities for stakeholder involvement discussed.
3 February 2025	Meeting held with representatives of Green Salvation	Visit to the museum display of the reconstructed NVIPT.
5 July 2025	Final formal stakeholder meeting held	To discuss the museum display of the NVIPT.

The following documents were successfully disclosed as part of the national EIA and international ESIA processes:

- Non-Technical Summary (Volume I of the ESIA Report) (English, Russian, Kazakh) - [Almaty International Airport \(alaport.com\)](http://AlmatyInternationalAirport.com)
- ESIA Report with technical appendices (English, Russian)
- Environmental and Social Management Plan (English, Russian) - [Almaty International Airport \(alaport.com\)](http://AlmatyInternationalAirport.com)
- Environmental and Social Action Plan (ESAP) (English, Russian)
- Stakeholder Engagement Plan (SEP) (English, Russian, Kazakh) - [Almaty International Airport \(alaport.com\)](http://AlmatyInternationalAirport.com)
- Land Acquisition and Resettlement Framework (English, Russian, Kazakh) - [Almaty International Airport \(alaport.com\)](http://AlmatyInternationalAirport.com)
- Noise Insulation Program (English, Russian, Kazakh) - [Almaty International Airport \(alaport.com\)](http://AlmatyInternationalAirport.com)
- Design documents for the new VIP terminal and the preservation/enhancement plan for the existing VIP terminal (Kazakh, Russian)
- Frequently Asked Questions (FAQ) leaflet (English, Russian, Kazakh)

After the 30-day consultation to meet national and Lender's requirements, stakeholder feedback was incorporated into the Final ESIA Report.

## Construction phase 2022 to 2024

Reliable and comprehensive project information was supplied to stakeholders in a manner that considered local conditions, as well as cultural and language preferences. Documentation and updates were made publicly available on the ALA website (<https://alairport.com>). This platform, managed by TAV, continues to provide key information during the operational phase, including updates on noise action plans. Stakeholders can also submit questions via an online form available on the website, which is effective during periods of travel.

To provide inclusive, timely, and safe communication during the COVID-19 pandemic, a variety of information disclosure methods were employed—including virtual meetings, online platforms, press releases, and targeted outreach through local media and social networks (see Table 4)—to accommodate different stakeholder needs and public health restrictions.

Table 4. Information disclosure methods used which included COVID-19 considerations

Stakeholder Group	Disclosed Information	Communication Methods
Airport workers	Amendments to current airport operating procedures and plans including emergency response plans (ERPs), alternations to access points. Information on job security, changes to working conditions. Proposals for safety zones and the sanitary protection zone (SPZ). Changes to operating restrictions, availability of aircraft stands, any temporary re-routing, and any other operational information of importance to aerodrome users as a whole. Disseminate runway restrictions using all practicable methods. Grievance mechanism	Airport website Press releases Social Media Communication through local akimats Notice to Airmen (NOTAM) and Automatic Terminal Information Service (ATIS)
Local communities including vulnerable groups Local institutions	Project documentation, especially the Non-Technical Summary (NTS), grievance mechanism, SEP, ESAP, Noise Action Plan including noise insulation scheme, Design documents for the relocation of the VIP terminal building. Timeline of construction with details of potential traffic delays, road closures and noisy activities. Noise Insulation Program Employment opportunities. Environmental performance and monitoring results. Proposals for the safety zones and the SPZ Information regarding resettlement and land acquisition including rights and entitlements Grievance mechanism	National and local newspapers and radio Social media Information centres / boards ALA job vacancies on telegram Head-hunter Airport website Project leaflets / letters Provision of information in Almaty employment centre In person / telephone assistance for vulnerable groups Virtual community meetings
National, regional and local governments, authorities and regulators	Supporting documentations / assessment for all permits / authorisations required for the project. Modelling / monitoring to inform discussions on safety zones and the SPZ. Evidence required as a condition of permitting / approvals over the life of the project.	All technical and non-technical Project documentation Monitoring results Email Virtual meetings
Organizations and personnel within the Project	NTS Tender documentation and results Contractor selection process Procurement requirements with environmental, health	Notice boards Site inductions Virtual meetings Meetings and toolbox talks

	and safety (EHS) and workers protection requirements Grievance mechanism	Emails
NGOs	Project information and NTS if requested. Proposals for the safety zones and the SPZ If triggered information regarding resettlement and land acquisition including the schedules and procedures for implementation of the Resettlement Plan.	Media Airport website Emails Meetings Telephone
International lenders	All project documentation Proposals for the safety zones and the SPZ Notification if resettlement and land acquisition if triggered. Monitoring and measuring results Monthly project updates	Emails Telephone Virtual meetings Meetings
Mass media outlets	Project information and NTS if requested. Proposals for the PSZ and SPZ Notification of resettlement and land acquisition if triggered.	Emails Interviews Telephone TV Programs

Gender, age, and disability considerations are incorporated into the SEP and engagement methods. Engagement activities are designed to provide accessibility in terms of both location and timing. For elderly and disabled community members who faced difficulties accessing information online or attending meetings due to mobility restrictions, alternative engagement channels such as radio broadcasts and newspaper advertisements were utilised. Local Akimats also displayed project information. Meetings were held in accessible locations and at times that accommodated family life and household responsibilities. ALA's CLO monitored feedback from vulnerable groups and developed additional engagement methods as needed to enhance their involvement in the ESIA consultations.

During construction ALA held monthly stakeholder consultation meetings, with announcements posted on the [www.alaport.com](http://www.alaport.com) website or through local Akimats via their websites and social media channels. Discussions in late 2023 with Akimats were focused on mitigation measures in Guldala, Kyzyltu-2, Almerek and Paniflovo communities.

#### 4.2 Noise Insulation Programme (NIP)

In April 2024, ALA initiated a series of engagement activities with community members known to be exposed to high levels of noise (above 60dB) to create awareness of the NIP and to identify volunteers to participate in the NIP. The NIP has been developed to mitigate aircraft noise on buildings and a reduction in noise exposure for the eligible surrounding communities. Residents who believe that aircraft noise is impacting their homes and lifestyles are able to participate in the programme.

To raise awareness of the NIP, community outreach began in earnest in 2024 with information of the program distributed by airport staff to eligible households in local communities. WhatsApp and email have been used for direct communication, concerns, queries and applications. The homes selected for the programme receive inspections and assessments from acoustic engineers to measure the noise levels inside and outside. The collected data is analysed and written into a formal report. Following this a noise insulation contractor, specialising in noise insulation for private houses, inspects the homes to assess what is needed to minimise noise intrusions. To date, the main solutions involve installation of triple-glazed windows and roof insulation.

The NIP awareness creation (meetings along with brochures) throughout 2024 led to piloting the NIP in

some houses in 2025. As of June 2025, 115 households had signed up to participate in the NIP. The NIP is expected to continue in three phases until 2040, hence communication on its activities and accomplishments will continue to be important.

#### 4.3 Sanitary Protection Zone (SPZ) and Public Safety Zones (PSZ)

The 2022 ESIA contributed to reigniting discussions about the need for protection and safety zones. Kazakhstan has legislation to only allow permissible development in the airport vicinity but this is not always enforced. A safety study in 2020 proposed a public safety zone (PSZ) focussed on physical safety of the communities within the vicinity of the airport who may be affected during airplane take-offs and landing. At the same time in 2020, the Ministry of Health suggested that ALA submit an application for a sanitary protection zone (SPZ) to address areas that are affected by noise pollution, air emissions, water contamination, and soil contamination from the airport activities.

A Working Group to determine the progress of implementation and decision making of the PSZ and SPZ was established as an outcome of meetings in 2024 and 2025. The first discussion took place in May 2025 and discussions will be ongoing until a plan for the PSZ and SPZ has been formulated and the required formal applications can be submitted.

### 5. Stakeholder Engagement Programme

To support the effective implementation of stakeholder engagement throughout the lifecycle of the Almaty Airport Expansion Project, a phased engagement program has been designed and is being carried out in alignment with good international industry practice and international standards. This program aims to ensure transparency, foster inclusive participation, and address stakeholder concerns in a timely and responsive manner. Key activities will be adapted to evolving circumstances, and cover internal organisational readiness, preparatory disclosures, and active engagement during construction. The program is structured as follows:

#### Summary of the new ESIA activities:

##### 1. Preparation Phase:

- Creation of a Project webpage with Q&A and grievance submission features.
- Ongoing implementation of the grievance mechanism, supported by awareness campaigns via press releases, social media, and notice boards.
- Key documents, i.e. ESIA package through online platforms and hard copies at council and airport offices as appropriate. The ESIA package in Kazakh and Russian includes a non-technical summary, the full ESIA report with appendices, an environmental and social management plan (ESMP) and this SEP.
- The ESIA package is available on the ALA website for review and comment from September 2025 until 6 October 2025. The public consultation meeting was convened on 7 September 2025 at the House of Culture, 42 Mailin Street, Almaty, for the purpose of presenting the ESIA findings for Project Horizon. The event was organised by ALA and attended by representatives from Mott MacDonald, EcoSocio Analysts Consultants, ALA, and approximately 60 members of the local community, 16 of whom were women. The meeting started at 11:30 and lasted for one hour. The presentation covered the objectives of the ESIA, an overview of the project components, the assessment methodology, key findings, and proposed mitigation measures. Following the presentation, a short break was held during which questions were registered (refer to [Table 5](#)).



Table 5. Summary of 7 September 2025 public consultation feedback and responses

Comments/Questions	Response
Concern was raised relating to community disturbance due to the asphalt plant near Almerek.	ALA recorded the concern, exchanged contact details with the residents, and committed to investigating the problem. The CLO will provide follow-up feedback.
Planned acquisition of garages along Akhmetova Street for public use.	This is a matter for the city council; it does not concern the airport. Representatives of the local akimat responded by clarifying the acquisition process and outlining the next steps.
NIP related questions on which houses are covered by the programme.	This support is intended for private homes. ALA will stay in contact, assess the location and condition of the house, and explore possible solutions. The process includes reviewing maps to understand the impact and conducting an on-site inspection with technical experts.
NIP related questions on how soundproofing works.	ALA will check with the technical team about the specific features of the house, but they normally do it by replacing the windows with double-glazed ones with thick glass and large openings
Legalisation of a property constructed in 1940, which had been registered but was facing administrative challenges during the renewal of its technical passport.	The akimat representative addressed the issue by arranging a personal meeting with the resident to resolve the matter.
Intermittent internet connectivity due to flights paths.	ALA will discuss this topic with the specialists from KazAeroNavigation and get back to the complainant.

- Individual responses were provided to all questions, and ALA committed to follow up. Communication channels were shared and made accessible, including a QR code linking to a log for submitting questions, to ALA's website, and an email address. Comments can be submitted until 6 October 2025.

## 2. Construction Phase:

- Distribution of FAQ leaflets in local languages and establishment of site notice boards.
- Continuous collection of stakeholder feedback through grievance mechanisms and updates to SEP.
- Notifications to residents on construction schedules, including high-risk or noisy activities, via letters, notices, and the airport website.
- Quarterly updates on procurement and contractor controls to stakeholders.

This streamlined approach will contribute to timely communication, inclusivity, and effective grievance management throughout the project phases.

Table 6 presents a summary of proposed stakeholder engagement activities for the Project.

Table 6. Stakeholder Engagement Program

Activity	Objective	Engagement Mechanisms	Stakeholders	Frequency	Responsible Parties
Grievance Redress Mechanism (GRM)	Address stakeholder concerns, especially regarding operational impacts like noise, traffic, and air quality, and incorporate feedback into action plans	Grievance mechanism (online, leaflets with CLO phone number, emails, hotline, local Akimat).  If a grievance is not resolved, involves public services, land use, and administrative misconduct, it may be escalated to the akimat through written documentation. This escalation would be undertaken by ALA based on the consent of the complainant.  Regular CLO monitoring of grievance submissions and follow-ups.	Complainants	Ongoing throughout new constructions and operations	ALA CLO
Information on environmental performance especially in relation to continuous noise monitoring.	Provide stakeholders with summaries of monitoring results and any subsequent changes to the noise action plan.	Reporting made publicly available	All stakeholders	Ongoing throughout new construction and operation	ALA CLO
Disclosure of noise insulation program and construction activities	Make relevant stakeholders aware of the noise insulation scheme and other construction activities taking place	www.alaport.com website Distribution of information leaflets among affected communities Individual and group meetings and consultations Notice boards	Local communities including residents within the noise action plan area.	Monthly	ALA CLO
Engaging with the relevant Regulators and disclose information on	To ensure all stakeholders are aware of zoning and restrictions to future development.	Airport website Consultation meetings with local communities	Local communities including residents	Ongoing	ALA E&S

the ongoing performance (success/challenges) of the SPZ and PSZ, including mitigation measures being implemented to reduce impacts on public health.			within the SPZ and PSZ/PSA .		
Updating SEP	Update meaningful engagement methods, keeping records of stakeholder engagement activities	ALA website	All stakeholders	Annually	ALA CLO
Annual E&S Reporting	Summarise E&S performance, grievance management, and updates to SEP	Publishing a summary of ESAMR on ALA's website	All stakeholders	Annually	ALA CLO

## 6. Resources and Responsibilities

The overall responsibility for implementing this SEP lies with ALA and the Project CLO. A key task is to adequately record stakeholder comments in a clear auditable 'trail' showing the comments, their source, and how they were considered for instance in the management of the new Project construction activities or in airport procedures.

For the new Project construction, ALA will appoint a senior staff member to attend the public consultation event and will appoint a Project Manager (PM), who will maintain oversight and coordination of stakeholder engagement activities that are required for the construction activities. In addition, ALA has environmental and community liaison staff who implement ALA's environmental and social management system.

ALA has appointed a full time CLO and an assistant to manage implementation of the SEP and the NIP. In addition, the Director of Corporate Communications Department will identify points of contact in the popular local and regional newspapers, radio and TV channels, provide them with initial Project information and include them in the mailing list about future events. The Communications Department is responsible for managing website contact. ALA will support the local Akimats who have a responsibility for sharing information with their constituents, for instance about the Project activities and the grievance mechanism.

## 7. Grievance Mechanism

### Purpose

ALA's grievance mechanism is based on the principle of providing an accessible, transparent, rights compatible, dialogue-based mechanism to receive and address concerns, feedback and complaints from interested and affected parties. A grievance can be defined as an actual or perceived problem that might give grounds for a claim. As a general policy, ALA and its project partners will work proactively towards preventing grievances through the implementation of management measures including mitigation, enhancement and monitoring as identified through assessment and planning processes and through community liaison with information disclosure and meaningful engagement.

The grievance mechanism process presented herein and shown in Figure 2 will address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all complainants and segments of the affected communities, at no cost and without retribution. At any time, anyone will be able to submit a grievance to the Project if they believe a practice is having a detrimental impact on the community, the environment, or their quality of life. They may also submit comments and suggestions. The grievance mechanism process is designed to be accessible for all individuals regardless of language, literacy, physical ability or employment status. The process allows individuals to raise complaints in-person, digitally, via email and through written or online forms. All application forms and instructions are available in local languages including Kazakh Russian and English, with plain non-technical language to provide clarity for regardless of literacy levels. Any type of issue can be raised, for instance, any concerns relating to Project performance relating to the management of environmental and social impacts, adherence to Project policies and procedures, or following through on commitments. The grievance mechanism does not prevent access to judicial or administrative remedies. ALA will inform interested and affected parties including affected communities about the grievance process in the course of its engagement activities, and report regularly to the public on its implementation, protecting the privacy of affected individuals.

Handling of grievances will be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the stakeholders' needs and concerns. For any grievances involving abuse, harassment of gender-based violence (an umbrella term for any harmful act that is perpetrated against a person's will and that is based on socially ascribed differences between females and males), a survivor-centred response<sup>4</sup> will be used. The mechanism will also allow for anonymous complaints to be raised and addressed. ALA is committed to protecting the identity of the Complainant and to handling personal information in accordance with legal requirements.

### Community Liaison Officer team

ALA will have the overall responsibility for collecting and processing comments/complaints and responding to any such comments and complaints. Depending on the nature of a comment/complaint support may be required from a multi-agency aviation safety committee. TAV has appointed a Community Liaison Officer and an assistant at ALA. These two staff will be responsible for community liaison and arranging communications with the Project-affected communities throughout the preparation, construction and operational phases.

The CLO team will document and record stakeholder engagement as detailed within the SEP and will evaluate stakeholder engagement performance to inform respective SEP updates. The CLO team will be responsible for leading the implementation of the SEP and receiving and channelling comments and concerns. The CLO team will maintain the grievance mechanism, and report grievances to the ALA/TAV

---

<sup>4</sup> In a survivor-centred approach, the survivor is at the centre of the response process, and decisions are based on the survivor's needs, choices, and capacities.



management.

Special care has been taken for the CLO team to be adequately trained for interfacing with complainants and managing the grievance mechanism. In addition, an appeal procedure for complainants who reject TAV's intended action to redress a grievance will also be in place. TAV established a Grievance Review Committee (GRC) to hear appeals, members will include the Project CLO, corporate communications department, customer relations department, construction manager, operation manager, etc.

Table 7 presents the grievance mechanism contact details. Any comments or concerns can be submitted to ALA in writing (by post, e-mail or by filling in a grievance form (example included – Appendix A)) or verbally by telephone. Signed and anonymous grievances will be accepted.

Table 7. Contact Details for Grievances

<b>Name</b>	Mariya Pozdnyakova
<b>Position</b>	Social Affairs/CLO
<b>Email</b>	<a href="mailto:mariya.pozdnyakova@tav.aero">mariya.pozdnyakova@tav.aero</a> <a href="mailto:customer.service.ala@tav.aero">customer.service.ala@tav.aero</a>
<b>Telephone</b>	+77081150514
<b>Address</b>	Almaty International Airport

Grievance forms will be made available at the airport, in the local authority office, schools, community centres and other public places that are easily accessible for community members.

### ALA grievance management

All grievances will be acknowledged within seven working days and a formal response identifying remediation measures, if appropriate, will be made within 30 working days.

The CLO team will classify grievances according to the categories shown in Table 7. Where investigations are required, Project staff and outside authorities as appropriate will assist with the process. The CLO team will identify an appropriate investigation team with the correct skills to review the issue raised. The investigation will also aim to identify whether the circumstance leading to the grievance is a singular occurrence or likely to reoccur. Identifying and implementing activities, procedures, equipment and training to address and prevent reoccurrence will be a main part of the investigation and resolution of activities.

Table 7 Grievance risk categorisation criteria

Classification	Risk level (to health, safety or environment)	Detail and response
Low	No or low	The grievance may not be related to Project performance, it may be a comment, or a request. The CLO team will acknowledge the communication within seven days and conduct an interview/s if required. The CLO team will document findings and provide a response within 30 days of receipt. The response is likely to have minimal cost in addition to time spent on addressing the issue.
Medium	Possible risk and likely a one-off event	The CLO team will acknowledge the complaint within

		seven days. The CLO team and appropriate staff will investigate. The CLO will provide a response within 30 days of receiving complaint. The corrective action is likely to be straightforward involving changing a piece of equipment or procedure which does not take long or have substantial cost implications to implement.
High	Probably risk and could reoccur	The CLO team will acknowledge the complaint within seven days and will work with managers to organise a major investigation team for prompt investigation and resolution. Work may be stopped in the affected area. The CLO team will provide a response within 30 days of receiving the complaint. If more time is needed to complete the investigation this will be communicated to the complainant within 30 days of receiving the complaint. As necessary the response will include a press release. The corrective action/s may be complex or sensitive involving changing equipment or a procedure which requires training of staff. It may have substantial effort, time or cost implications. If the grievance is related to an urgent issue which could result in harm to people or damage to the environment, the response times will be shortened as necessary.

The CLO team will explain to the complainant in writing (or where literacy is an issue, orally) the grievance review process, any investigation results, any changes to activities that will be undertaken to address the grievance, and how the issue is being managed to meet relevant environmental and social or human resource management systems. In some cases, it will be appropriate for the CLO team to follow up at a later date to see if the person or organisation is satisfied with the resolution or remedial actions. The grievance will be closed out in the register as:

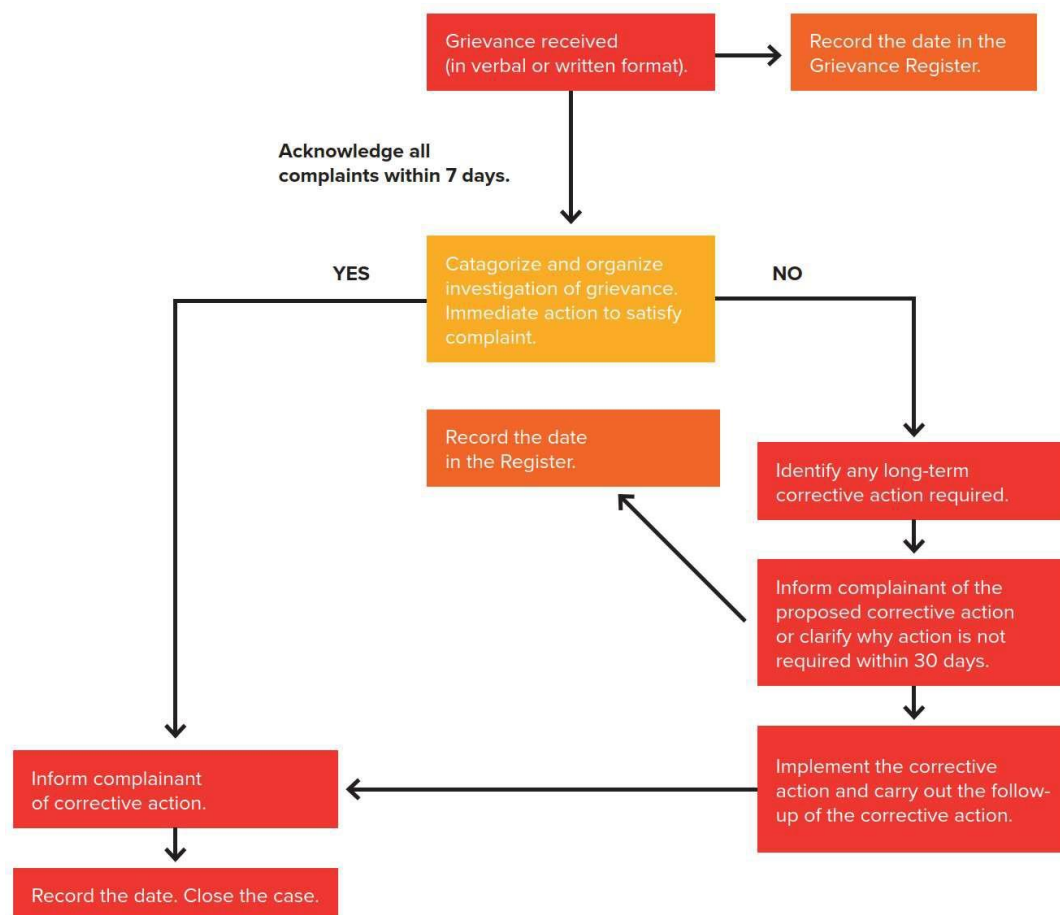
- Resolved - the resolution has been communicated, agreed and/or implemented.
- Unresolved - the complainant did not accept the proposed resolution and has appealed to other entities for resolution.
- Abandoned - the complainant is no longer contactable and efforts to trace whereabouts have been unsuccessful.

The CLO team will summarise grievances monthly during construction and quarterly during operation removing identification information to protect the confidentiality of the complainant and guaranteeing anonymity. The CLO team and management will use the grievance mechanism for trends and lessons learned and to identify additional mitigation measures or reinforcement activities relating to E&S performance.

In terms of appeals, if a resolution cannot be achieved with the above response, the complainant can appeal to the GRC.

If the complainant rejects a decision of the GRC, then recourse to judicial or administrative procedures remains open to the complainant (legal or administrative resolution of the grievance).

Figure 2. Grievance Management Flow Chart



## 8. Monitoring and Reporting

Successful stakeholder engagement is on-going throughout the Project and requires performance monitoring, analysis and disclosure of information allowing adaption to changing circumstances and stakeholder information needs.

ALA will implement the SEP and then monitor and analyse the effectiveness and efficiency of the disclosure and engagement activities.

### 8.1 Monitoring

The following indicators will be used for monitoring and improving stakeholder engagement performance in support of the airport's operations, including the new Project construction, and to verify compliance with national and international standards and requirements:

- Number of public consultation participants
- Number of publications on the new Project construction in local and national media
- Number of stakeholder comments and suggestions received through various feedback channels
- Type/category of stakeholder comments and suggestions addressed by ALA and through what means
- Number of stakeholder grievances and claims
- Key categories of grievances received (airport operations, environmental issues, labour relations, etc.)
- Number of grievances outstanding, resolved, unresolved and appealed
- Time taken to resolve grievances
- Complainants' feedback on the process and resolution
- Enquires in relation to the NIP scheme

### 8.2 Reporting

ALA will annually summarise details of stakeholder engagement including issues raised and mitigation actions undertaken by ALA. These details will be captured in annual sustainability reporting. During the construction activities for the Project, quarterly reporting will be provided on engagement activities and results, and grievance management.

## Appendices

### Regulations and Requirements

#### EBRD and IFC Project Categorization and Requirements

##### Project Categorizations

Under the EBRD Environmental & Social Policy (2008), projects can be categorised as A, B, C or FI based on environmental and social criteria. It is understood EBRD have Categorised the Project as B which indicates that the Project has the potential to result in adverse environmental and social impacts which are typically site specific and readily identified and addressed through mitigation measures.

Under the IFC's environmental and social screening criteria, a project can be categorised as A, B or C, depending on the level and significance of expected environmental and social impacts, to reflect the magnitude of impacts understood as a result of assessment. It is understood the Project has been defined as a Category B project which indicates that there is the potential for limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.

##### EBRD Requirements

EBRD's ESR10<sup>5</sup> requires that *"for projects that are likely to be associated with adverse environmental and/or social risks and impacts, the client will develop and implement an SEP or an equivalent documented process, proportionate to the nature and scale of the risks, impacts and development stage of the project. For any project that requires an Environmental and Social Impact Assessment (ESIA), the SEP will apply the disclosure and consultation requirements"*.

ESR10 contains the following provisions:

- SEP: Development of a SEP in order to outline how communication with identified stakeholders will be handled throughout Project preparation and implementation;
- Information disclosure: Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project;
- Meaningful consultation: If employees and/or affected communities will or may be exposed to significant risks or adverse impacts from the project, meaningful consultation will be undertaken in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the project proponent to consider and respond to them; and
- Grievance mechanism: The project proponent will need to be aware of and respond to stakeholders' concerns related to the Project in a timely manner. For this purpose, an effective grievance mechanism to receive and facilitate resolution of stakeholders concerns and grievances will be established.

The Project currently does not require land acquisition and resettlement. However, a Land Acquisition and Resettlement Framework (LARF) was developed for the airport during previous development, to cover any potential land acquisition related to the operation of the airport imposed by the GoK in the future.

Should EBRD ESR5<sup>6</sup> (Land Acquisition, Involuntary Resettlement) be triggered in the future, the following statement will be applicable to the Project:

*Following disclosure of all relevant information, the client will consult with affected persons and communities, including host communities, and facilitate their early and informed participation in decision-*

---

<sup>5</sup> EBRD Environmental and Social Requirement 10 – Stakeholder engagement, 2024

<sup>6</sup> EBRD Environmental and Social Requirement 5 – Land acquisition, restrictions on land use and involuntary resettlement, 2024



*making processes related to resettlement, in accordance with ESR10:*

- *Affected persons shall be given the opportunity to participate in the negotiation of the compensation packages, eligibility requirements, resettlement assistance, suitability of proposed resettlement sites and the proposed timing.*
- *Special provisions shall apply to consultations which involve individuals belonging to vulnerable groups. Consultation will continue during the implementation, monitoring, and evaluation of compensation payment and resettlement so as to achieve outcomes that are consistent with the objectives of this ESR.*

*The grievance mechanism to be established by the client in accordance with ESR10 will be set up as early as possible in the process, consistent with this PR, to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities, including a recourse mechanism designed to resolve disputes in an impartial manner. A summary of complaints and the measures taken to resolve them shall be made public on a regular basis, in accordance with ESR10.*

### IFC Requirements

The requirements for consultation with the external stakeholders are defined in the IFC Social and Environmental Sustainability Policy and in the respective IFC Performance Standards and Guidelines.

According to the IFC requirements, public consultation should be carried out in the process of preparing the ESIA document on environmental and social aspects of the Project. Consultation should be conducted as early as possible and the relevant project-related information should be made accessible in advance. Based on the outcome of the consultations, the attitude of the stakeholders should be taken into consideration and consultation should be carried out as required during the life of the Project.

The IFC publication “Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets”<sup>1</sup> can be used as guidance. The handbook describes key stakeholder engagement principles and approaches (in accordance with the IFC’s performance standards) and provides concrete examples of implementing these approaches in different countries.

The key principles are summarised below:

- Be targeted to those most likely to be impacts and involve all representatives of local communities (including women, aged people, children, etc.);
- be *initiated* at an early stage to scope key issues and have an effect on project decisions;
- be *free* of external manipulation, interference, or coercion, and intimidation;
- be *informed* as a result of the adequate dissemination of information in advance;
- be *based* on timely, actual, understandable and accessible information available in the language preferred by the affected communities;
- *incorporate* two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- be *documented* and include clear mechanisms for responding to people’s concerns, suggestions and grievances in a timely manner;
- *incorporate* where appropriate and feasible, feedback into project or programs design and reporting back to stakeholders; and
- be *ongoing* as required during the life of the project.

IFC have also produced guidance<sup>7</sup> to assist clients in identifying alternative approaches and mechanisms

---

<sup>7</sup> Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19

for engaging stakeholders for continuing to deliver project-related information to the communities within their areas of operations and for receiving feedback, while taking all feasible steps to protect the health and safety of those involved. Guidance in this document has been incorporated with this plan and will be reviewed during the course of the programme and as local and global developments in the pandemic unfold.

As noted above the Project currently does not require land acquisition and resettlement. However, if this changes due to future operations or designation PS5<sup>8</sup> will be triggered and the following requirement will be met:

*The client will engage with Affected Communities, including host communities, through the process of stakeholder engagement described in ESR 1<sup>9</sup>. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of this Performance Standard.*

*The client will establish a grievance mechanism consistent with Performance Standard 1 as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.*

### Kazakhstan National Requirements

The Aarhus Convention establishes the rights of the public with regard to the environment including access to information, public consultation in decision making and to raise complaints when there is a perception that considerations of environmental issues are insufficient. In 2000 the Republic of Kazakhstan ratified the Aarhus convention (Kazakhstan Law on ratification No 92-II dated 23 October 2000).

The Environmental Code of the Republic of Kazakhstan (2007) requires public hearings to ensure the provision of information during the EIA (OVOS) process, the State Environmental Review (SER) process and public participation in decision-making on the issues of environmental protection and use of natural resources.

All interested members of the public and public associations should be given an opportunity to express their opinion during the EIA (OVOS) process prior to submittal of the Project for State Environmental Review.

The Order of the Kazakhstan Ministry of Environmental Protection (No 135, dated 7 May 2007 (with amendments and additions of September 8, 2017)) "On Approval of Rules for Conducting Public Hearings" requires public hearings for projects which may directly impact human health and the environment. Public hearings participants usually include; the general public, non-government and community organisations, regulatory bodies and local / national media.

Regulations require that during all stages of the ESIA interested parties are made aware of the process, information is provided and feedback is possible. Interested parties should also be provided access to EIA documentation / studies. It is noted exemptions may be made to disclosure of information under other public Kazakhstan legislation for example due to national security concerns.

The developer is responsible for organisation and financing of the hearings and for providing the required technical support and information. The date and venue of the hearings should be agreed by Developer with the local regulator and a public announcement should be made 20 days prior to the hearing within local / national media. The announcement should also provide interested parties with details of where EIA material

<sup>8</sup> IFC Performance Standard 5 – Land Acquisition and Involuntary Resettlement, January 2012

<sup>9</sup> IFC Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts, January 2012

/ studies can be viewed (the material must be made available from the date of the announcement). Additional means of notification can also be used.

Public hearings must commence regardless of the number of interested parties attending. Attendees can ask questions, express their concerns during the course of the hearings. The developer presents EIA results and will answer all questions raised by the public or other participants.

Minutes of the hearings must be documented and the developer may decide to improve environmental and social aspects of the Project based on the finding of the hearings, incorporating public opinion.

The developer should perform an analysis of the public hearings results and decide whether the Project requires amendments based on public concerns / recommendations. After the public hearings, the Developer submits the package of documents to the State Environmental Review – minutes of the public hearings, project documents including EIA with due consideration of public concerns if any, also comments should be submitted if the Developer considers some public recommendations/concerns not sufficiently substantiated to be taken into account.

After passing SER the conclusion of SER shall be sent by the developer to be posted on the internet resource of the local executive body in the field of environmental protection within five working days after its receipt.

Individuals and legal entities have the right to appeal the conclusion of the SER.

### **EU Directives**

The Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU) allows the competent authority to scope what information should be covered by the developer within the EIA. After which the developer must provide information on the environmental impact in the form of an EIA report. The process requires the environmental authorities and the public to be informed and consulted on the Project and the competent authority will take into consideration the results of consultations. The public must then be informed of the decision and can challenge it through the courts.

The objective of the aforementioned Directives is to provide a high level of protection of the environment and to integrate environmental considerations into the design / development of projects, plans and programmes with a view to reduce environmental impacts. In addition, it ensures public participation in decision-making.

## Grievance Form

### Personal Details

Details of complainant First name: \_\_\_\_\_  
Surname: \_\_\_\_\_  
I wish to raise my grievance anonymously  
I request my identity is not disclosed to other parties

Contact details  
*Please confirm the requested method of response*  
By Post to \_\_\_\_\_  
By telephone \_\_\_\_\_  
By email \_\_\_\_\_

Preferred language for communication  
Kazakh  
Russian  
English

### Description of the Incident or Grievance

Date(s) \_\_\_\_\_

Occurrence  
Single occurrence  
Multiple occurrence (please state number of occurrences)  
On-going

Details of Incident  
*What, where, affected persons and impacts*

Recommended actions  
*Please provide details for consideration in resolving this issue*

For official use only.  
**Reference No.:**

## Grievance Register

Reference No	Name & contact details	Date received	Details of complaint / comment	Responsible party	Actions taken	Date closed