



STAKEHOLDER ENGAGEMENT PLAN

Kyzylorda to Zhezkazgan Road Rehabilitation Project, Kazakhstan

June 2021

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1 INTRODUCTION

1.1 BACKGROUND

This document is a Stakeholder Engagement Plan (SEP) prepared for the Committee for Roads (CoR), (the direct Client being JSC KazAvtoZhol under a service agreement for design and construction of national roads) within the Ministry of Industry and Infrastructural Development (MIID) of the Republic of Kazakhstan, identifying relevant stakeholders, defining communication channels and plans regarding the following development:

Reconstruction of approximately 204 km of a 427 km road linking the cities of Kyzylorda (the main rice producer in the south of the country) and central Zhezkazgan (the country's copper capital).

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) requirements, European Union (EU) directives and international best practice related to information disclosure and outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document so it should be reviewed and updated periodically and in line with new activities, changes in Project design and newly identified stakeholders.

Specific objectives of the SEP are detailed below.

1.2 OBJECTIVES OF THE PLAN

The SEP aims at summarising the methods, procedures, policies and activities that will be implemented by the Client to inform stakeholders in an inclusive and timely manner about the potential impacts of the Project.

The public will be able to access and review this SEP at KazAvtoZhol offices in both Nur-Sultan and Kyzylorda, at the Akimat district offices in Syrdaria and Shiyeli.

Stakeholder engagement and consultation aims to inform and improve Project decision-making and build understanding by actively involving individuals, groups and organizations with a stake in the Project. It helps to:

- Identify and involve all potentially affected groups and individuals;
- Generate a good understanding of the Project amongst those that will be affected;
- Identify issues early in the Project cycle that may pose a risk to the Project or its stakeholders;
- Ensure that mitigation measures are appropriate (implementable, effective, and efficient); and
- Establish a system for long-term communications between the Project and communities that is of benefit to all parties.

2 PROJECT DESCRIPTION

2.1 OVERVIEW OF THE PROJECT

The Government of Kazakhstan (GoK) approached the EBRD requesting a sovereign guaranteed loan to finance the urgent reconstruction of the 204 km section of Kyzylorda-Zhezkazgan road and greenfield construction of the 15 km Kyzylorda bypass (4 lanes). The EBRD is considering financing for both sections, although this SEP is only for the 204 km section of Kyzylorda-Zhezkazgan Road Project (12 km to 216 km), meeting the requirements of a Category B project under EBRD's Environmental and Social Policy, whereas the 15 km Kyzylorda bypass is classed as a greenfield Category A project.

The proposed investments include reconstruction of approximately 204 km of a 427 km road, linking the cities of Kyzylorda (the main rice producer to the south of the country) and central Zhezkazgan (the country's copper capital) to improve transport links with reduced travel time and increased transit, enhanced road user and public transport passenger experience, improved road safety, job creation and wider economic development and improved socio-economic living conditions in the region.

2.2 RECONSTRUCTION PLANNED AND ROAD SETTING

The road is currently a two-lane Category III Road in accordance with Kazakhstan Construction Norms and Rules (SNiP) and was constructed about 30 years ago. The rehabilitation will result in a road to the higher technical Category II. This will entail works related to the road pavement, construction of bridges, interchanges, gender sensitive roadside facilities, rest areas, stops for public transport and financing supervision engineers. Once complete, the road will be tolled as part of the Company's ongoing work to rollout an electronic tolling system on the newly reconstructed roads nationwide (this is outside of EBRD's Project scope).

This investment will involve greater road safety standards with increased transit through this part of Kazakhstan. In addition to an increase in the road capacity, there will be a reduction in travel time. The road connects Kyzylorda, the main rice producer to the south of the country and Zhezkazgan, the country's copper capital. It is a connector road to the key trade-enabling Central Asia Regional Economic Cooperation (CAREC) Program's Corridor in the south of the country and the Center-North-border of the Russian Federation corridor in the north. Once reconstructed, it will offer the shortest transport link for transit flows from Central Asia to the Russian Federation, as well as the socially significant route for the very sparsely populated and economically isolated settlements along the road. The reconstruction of the road is prioritised by the government as part of the regional Covid-19 crisis response to provide direct connectivity between the regional cities to improve accessibility to social and economic opportunities.

The proposed road section will take place in two main districts: Syrdaria and Shiyeli. These are both located in Kyzylorda Oblast region. The project is divided into six zones:

- from 12 km to 24 km;
- from 24 km to 76 km;
- from 76 km to 127 km;
- from 127 km to 156 km;
- from 156 km to 186 km; and
- from 186 km to 216 km.

It was originally planned that construction will commence around Q1 2021 for most sections of the road and would be completed within 36 months from the date of signing the contract for the road works construction. The programme is behind schedule.

According to the information provided by the road designers, some of the key road design characteristics are presented in Table 1 below.

Table 1 – Overview of Road Design Features

	12 – 24*	24 - 76	76 - 127	127 - 156	156 - 186	186 - 216
Road category	II	II	II	II	II	II
Length (km)	11.323	53.551	50.114	28.335	30.010	30.548
Off ramps	13	11	11	6	6	7
Cattle underpasses	3	-	2	-	-	1
Rest areas	2	1	2	1	1	1
Bus stops	2	-	-	-	-	-
Bridges	2	-	-	-	-	-
Intersections	-	-	-	-	-	-

Note: *this section connects to Kyzylorda bypass. Although not directly part of this E&S Assessment and this SEP, the bypass road design features are: Category IB, length 14.585 km, 2 off ramps, 3 cattle underpasses, 1 bridge and 2 intersections.

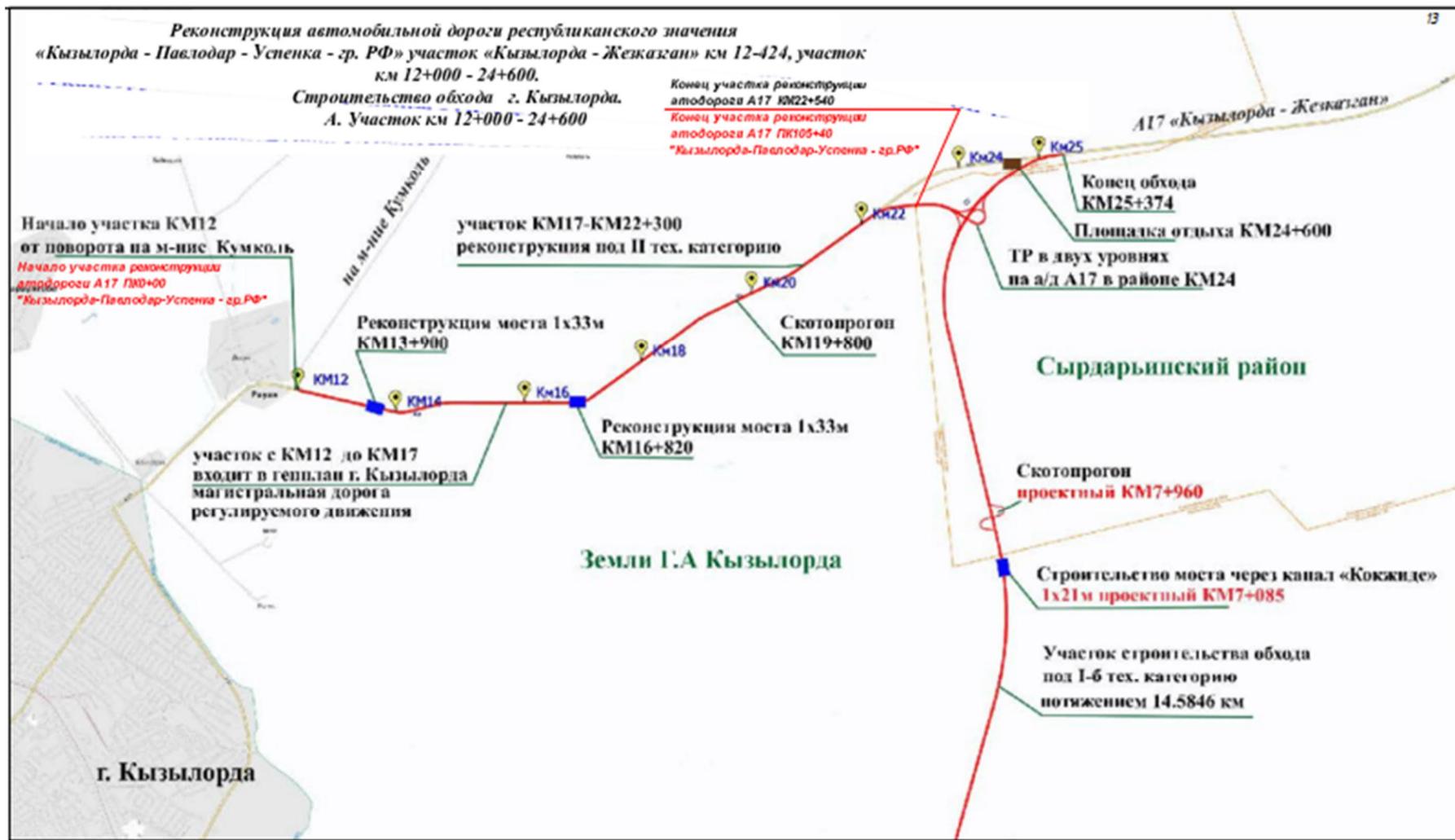
The project will build temporary side roads in order to ensure flow of traffic during the construction stage of the project. However, it is not yet known on which side/direction (left or right), these roads will be constructed. These side roads will be constructed of gravel materials.

The land to be used for the road upgrade and its associated Right of Way (RoW) at 20 m each side from the centre of the road for a Category II Road is government owned and has been assigned to KazAvtoZhol for the purpose of the project (i.e. permanent and temporary use). In accordance with the current design of the road, there will be no physical displacement and no private lands are present within the project area.

The surrounding lands within the project area of influence are mainly grazing lands. Agricultural activities were not observed along the whole length of the road - the lack of irrigation and the visible salinity of the soil make the project area not suitable for agricultural use.

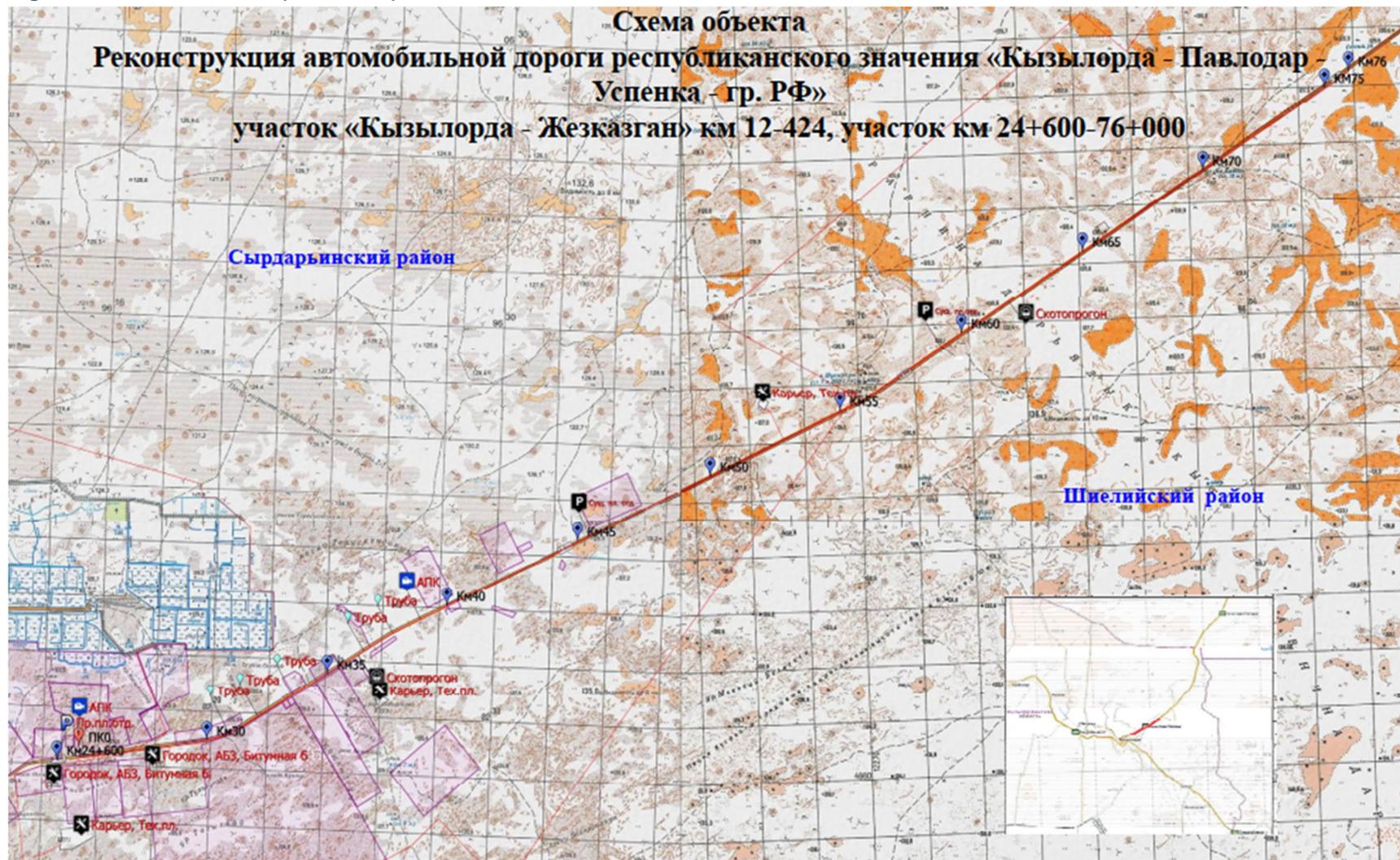
The road sections and design features along the road are presented in Figures 1 – 6 below.

Figure 1 – Road Section 1 (12-24 km)



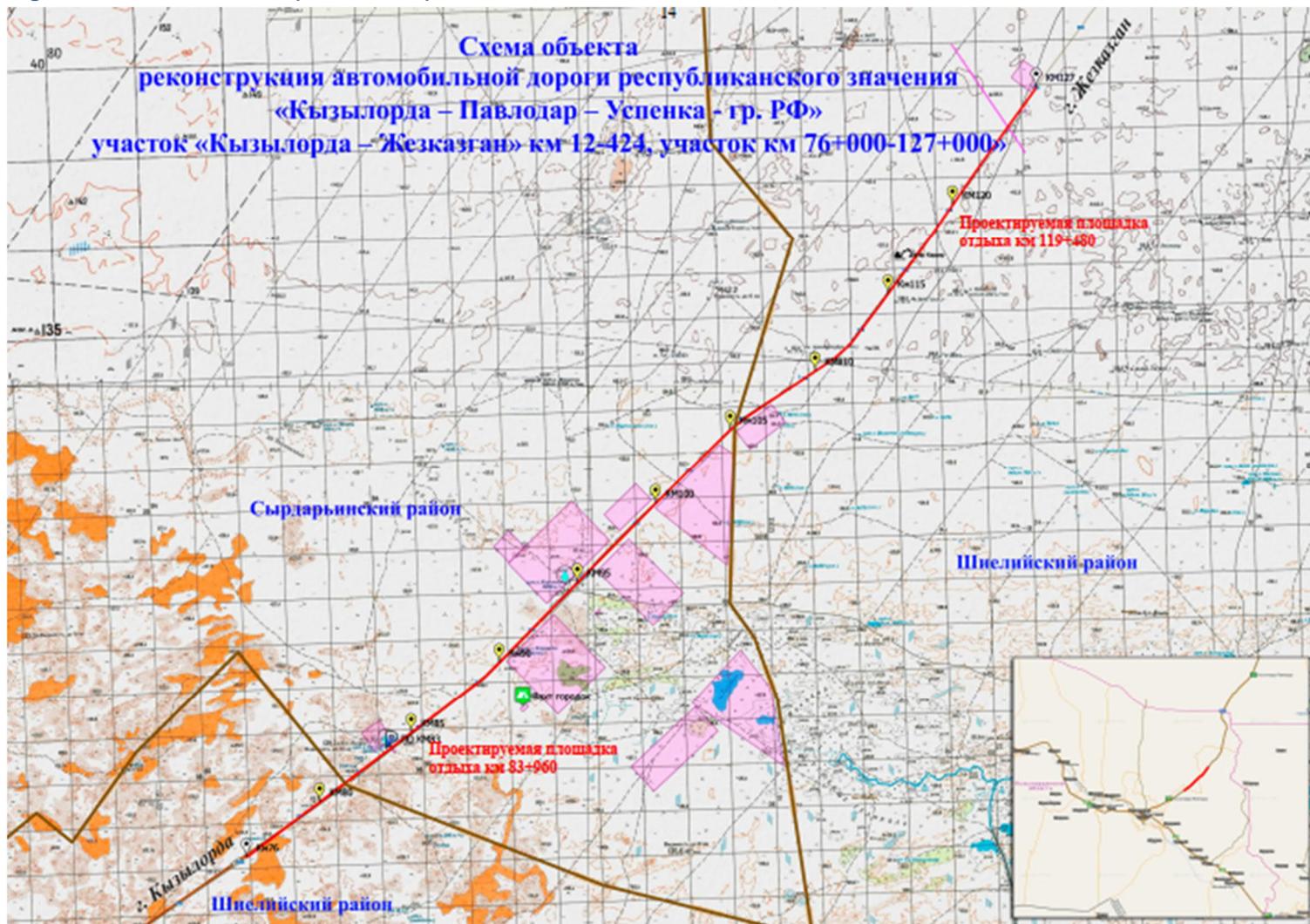
Source: Conclusion of state expertise № 01-0043/21 dated 26.01.2021.

Figure 2 – Road Section 2 (24 - 76 km)



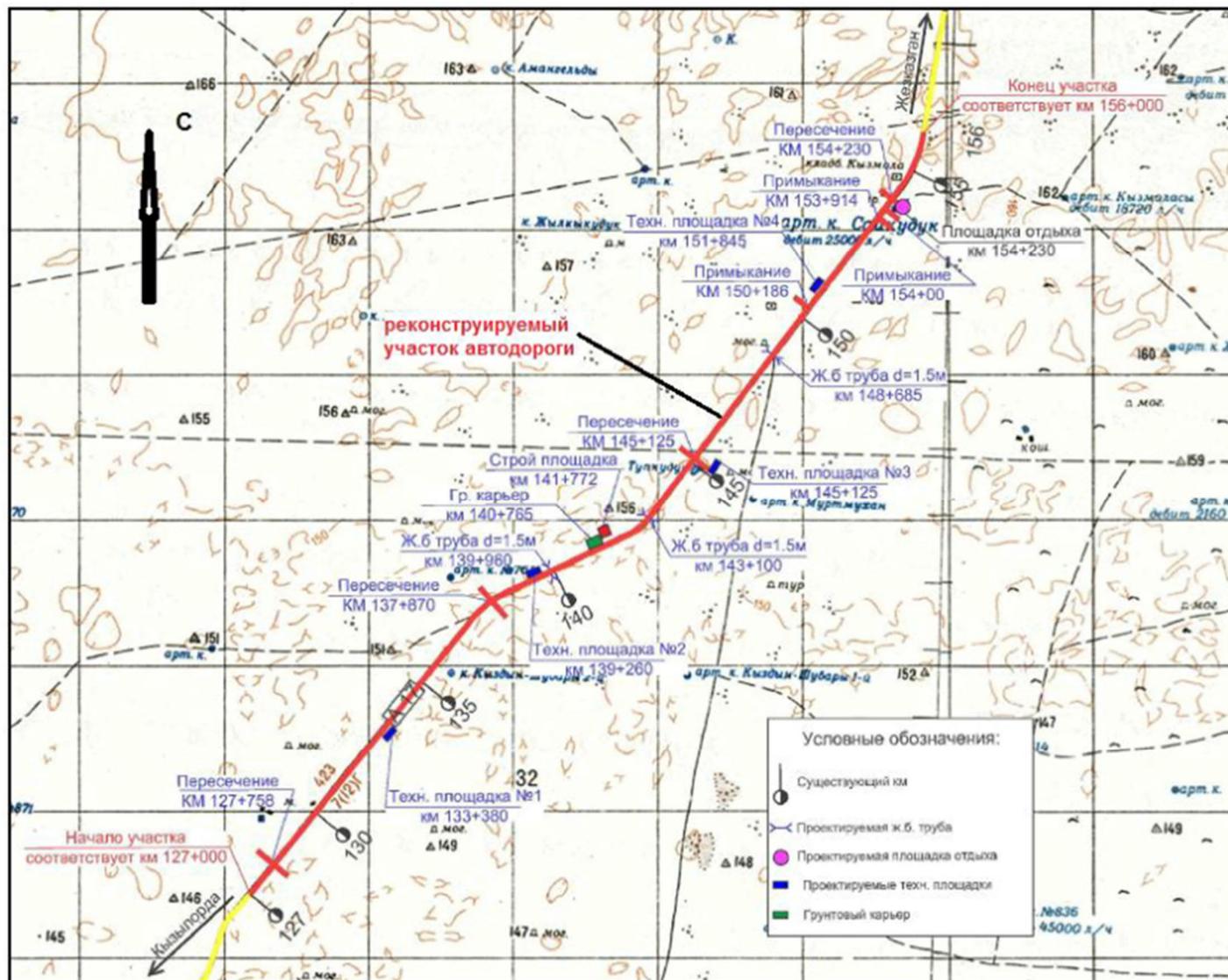
Source: Technical report "Technical survey of the current condition of the road and associated infrastructure for the project 'Reconstruction of the road of republican significance A-17 'Kyzylorda-Pavlodar- Uспенka-border with Russian Federation' section 24-76 km"

Figure 3 - Road Section 3 (76 - 127 km)



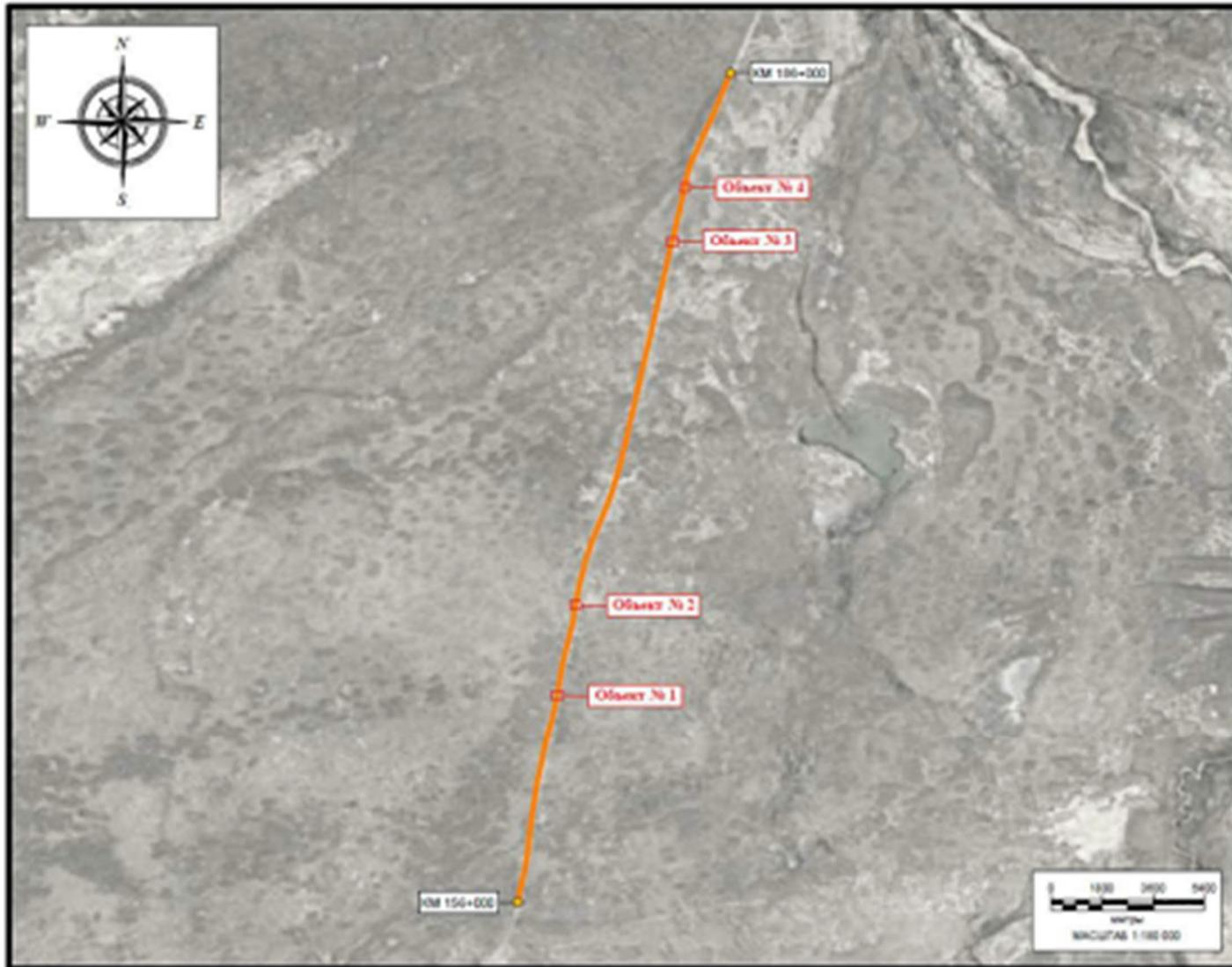
Source: Reconstruction of the road of republican significance 'Kyzylorda-Pavlodar-Uспенка- the border of the Russian Federation' section 'Kyzylorda-Zhezkazgan km 12-424, EIA section 76 -127 km.

Figure 4 - Road Section 4 (127 - 156 km)



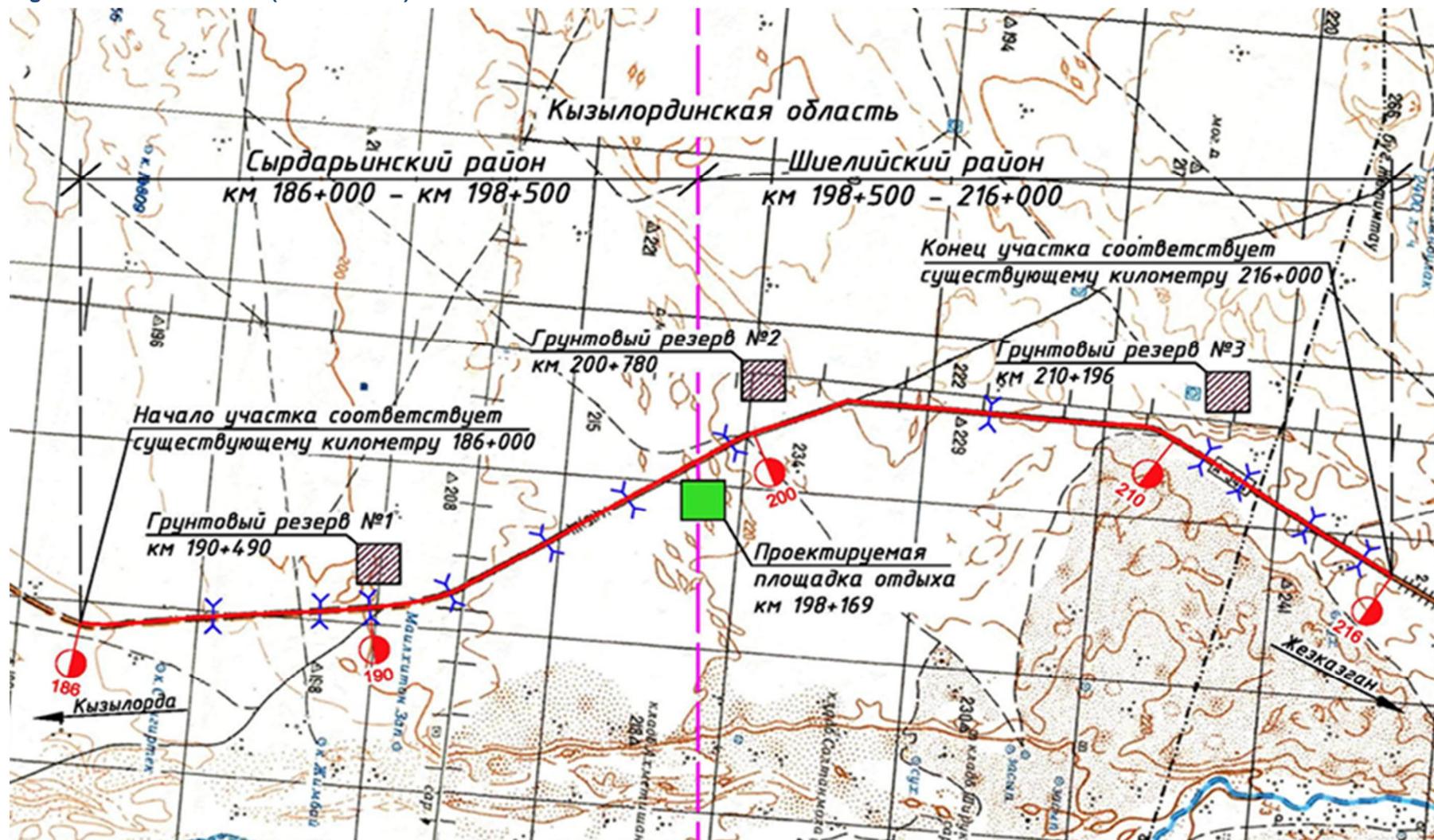
Source: Conclusion of state expertise № 01-0574/20 dated 03.12.2020.

Figure 5 - Road Section 5 (156 - 186 km)



Source: Conclusion of Archaeologic expertise No.AEC-180 dated 31.10.2019. Appendix 1.

Figure 6 - Road Section 6 (186 - 216 km)



Source: Conclusion of state expertise № 01-0550/20 dated 24.11.2020.

3 CONSULTATION AND DISCLOSURE LEGISLATIVE FRAMEWORK

3.1 NATIONAL LEGISLATION REQUIREMENTS

The Republic of Kazakhstan ratified the Aarhus Convention in 2000 (Kazakhstan Law on ratification No 92-II, dated 23rd October 2000) that governs requirements for public consultation and the access to environmental information and public participation in environmental decision-making. The Aarhus Convention stipulates the public's right to be informed about the environmental conditions, the right to public consultations with regards to projects impacting on the environment and the right to file complaints when the public perceives that considerations of environmental issues are insufficient.

According to the Kazakhstan Environmental Code (2007) Article 57 paragraphs 1-4:

- All interested people and public associations can express their opinions during the State environmental expertise;
- The conclusion of the state environmental expertise should be sent by the project originator to be published on the Internet, resource of the local environmental protection executive body within five working days after its receipt;
- Individuals and legal entities have the right to challenge the conclusion of the state ecological expertise in the order established by the legislation of the Republic of Kazakhstan; and
- It is the responsibility of local executive bodies to conduct public hearings.

Under the Environmental Code (Article 163), all environmental information is available to the public except as exempt by Kazakhstan legislation. As per the Order of Kazakhstan Ministry of Environmental Protection No 204-p dated 28th June 2007, the project originator shall provide the following through all stages of the environmental impact assessment:

- Ensure awareness and participation of the interested public in the Environmental Impact Assessment (EIA) implementation process; and
- Ensure access of the interested public to EIA materials.

The key channel of stakeholder engagement is public hearing. The Order of the Kazakhstan Ministry of Environmental Protection No 135 dated 7th May 2007 focusing on the implementation of public hearings is based on the principles of ensuring the constitutional rights of citizens and public associations of the Republic of Kazakhstan on obtaining timely and accurate information on the environmental conditions and public participation in the process of decision-making related to environmentally significant issues. The participants of public hearings should be:

- Stakeholders;
- Public and non-governmental organisations and associations;
- Local executive and authorities including state authorities; and
- Mass media.

The Order stipulates that EIA materials should be discussed during the public hearings and local authorities must be engaged and involved in the organisation of public hearings. Contact details of locations where relevant stakeholders can access EIA and other project materials should be publicised.

During the public hearings, all relevant stakeholders have the right to speak and ask questions under the established procedure. The project implementer will record and gather all reports, questions, answers and speeches and will prepare the minutes of the meeting.

Grievance Mechanism

Complaints from the public in Kazakhstan are regulated under the Law “On the procedure for reviewing inquiries from individuals and legal entities”, 2007. The law prescribes the following:

- Complaints must be received, recorded and reviewed. It is against the law to reject a complaint;
- When a complaint received does not fall under the responsibilities of the receiving body, the complaint must be redirected to the relevant body no later than 3 working days from its receipt. The person who logged the complaint has to be informed accordingly;
- Complaints, which do not require collection of any additional information or site visits, must be reviewed within 15 calendar days; when additional information or a site visit is required, the complaint must be reviewed and resolved within 30 calendar days;
- Once a complaint has been resolved, the relevant body must inform the person who logged the complaint on the outcome of the review; and
- Anonymous complaints and those that do not clearly state the matter are not reviewed. The complaint should include the name, position, and name of a person whose actions are being appealed, motives and demands.

3.2 EBRD REQUIREMENTS

The Project needs to adhere to EBRD Environmental and Social Policy 2019 and the ten EBRD Performance Requirements (PRs). The Project has been assessed against PRs 1, 2, 3, 4, 5, 6, 8 and 10. The EBRD PR 7 (Indigenous peoples) and PR 8 (Financial Intermediaries) are not applicable, as there are no indigenous peoples within the Project area, and no financial intermediaries are involved. The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

Table 2: EBRD PR10 Requirements

<ul style="list-style-type: none">■ Identify the various individuals or groups who are affected or likely to be affected by the Project; or may have an interest in the Project.■ Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.■ Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.■ Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.■ Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.
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3.3 BEST INTERNATIONAL PRACTICE

The key principles of inclusive and effective engagement for a project are summarised as follows:

- Providing meaningful information in a format and language that is readily understandable and tailored to the needs of the target stakeholder group(s);
- Providing information in advance of consultation activities and decision-making;
- Providing information in ways and locations that make it easy for stakeholders to access it and that are culturally appropriate;

- Respect for local traditions, language, timeframes and decision-making processes;
- Two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- Inclusiveness in representation of views, including people from different age groups, gender, vulnerability and/or minority groups;
- Processes free of intimidation or coercion or incentivisation;
- Clear mechanisms for responding to people's concerns, suggestions and grievances; and
- Incorporating, where appropriate and feasible, feedback into project or programs design and reporting back to stakeholders.

These principles will be reviewed and accordingly adopted by the Client dependent on the gaps between national legislation, EBRD requirements and best international practices.

3.4 GENERAL STAKEHOLDER COMMUNICATION RECORDS MAINTENANCE

A Project Community Liaison Officer (CLO) will be assigned for the Project to ensure regular consultation and interaction with the affected local communities. Their key responsibilities will be maintaining consultation records, and minutes of meetings and write-ups of informal consultations will be maintained by the local authorities/CLO clearly logging the key information provided to stakeholders and the key incoming communications, complaints and questions along with a summary of actions taken.

As part of this communication procedure, local authorities/CLO will record and update these stakeholder engagement activities on an on-going basis and will prepare annual reports summarising the activities and key emerging themes raised by affected people.

4 STAKEHOLDER IDENTIFICATION

4.1 IDENTIFICATION OF MAIN STAKEHOLDERS

The purpose of stakeholder identification is to identify and prioritise project stakeholders for consultation. Stakeholder identification is an ongoing process, and thus key stakeholders will continue to be identified during different stages of the Project. A systematic approach is used to map the stakeholders based on the Project zone of impacts. In this approach, by mapping the zone of social impacts, stakeholders are identified by the impact area.

As a result of the stakeholder mapping, Project stakeholders are categorised into two main categories:

- a) primary stakeholders are the individuals and groups who are affected directly by the Project; and
- b) secondary stakeholders are those parties which have influence on, but are not necessarily directly impacted by, the Project.

The following impacts are anticipated as a result of the road developments:

Table 3: Impacted Communities

Kyzylorda Region Road Alignment (km 12 to km 216)
<p>No permanent land acquisition impact is anticipated as the lands are government owned. The following communities are anticipated to be affected indirectly as a result of the project:</p> <ul style="list-style-type: none"> ■ Residential households near the road RoW / alignment (note that the alignment is sparsely populated throughout) ■ Businesses including petrol stations, cafes and service areas, brick works and a quarry ■ Visitors to memorials / cemeteries located near the road RoW / alignment ■ Local persons / migrant workers hired for construction ■ Regional public ■ Local herders and farmers ■ Road users who may be affected during the construction work ■ Users of Katym Well

The nature of the indirect impact would be mainly associated with construction works and operation of construction camps etc..

Key stakeholders identified are presented in Table 4 below.

Table 4: Key Identified Stakeholders and Methods of Engagement

Type	Name	Impact/Influence	Preferred Method of Engagement
Project Shareholders / Internal Stakeholders	Committee for Roads, Project Implementation Unit (PIU) at local level of KazAvtoZhol, the EBRD, Internal employees of KazAvtoZhol	This group will directly influence and impact the project through the decision-making process. They are considered as 'Primary Stakeholders'.	KazAvtoZhol to facilitate meetings with shareholders and employees (preferably quarterly).
Contractors/Suppliers	Third party companies who provide and supply products to KazAvtoZhol, including the road construction contractors.	The contractors and suppliers will directly influence the project through following corporate rules and compliance with environmental and social legislation.	KazAvtoZhol to incorporate environmental and social standards in related tenders and ensure monitoring of suppliers on labour management issues and

Type	Name	Impact/Influence	Preferred Method of Engagement
			compliance with Kazakh laws.
Permitting bodies, local governmental agencies	<ul style="list-style-type: none"> ■ Ministry of Environmental Protection ■ Ministry of Labour and Social Protection of Population ■ Ministry of Social development ■ Ministry for Investment and Development ■ Ministry of Finance 	This group will have a direct influence/impact on the project through approving permits, providing certificates and enforcing new regulations and rules.	KazAvtoZhol to write official letters and e-mails, and undertake meetings with the permitting bodies when necessary.
Communities and Businesses	Communities surrounding the Road: The land along the road alignment is sparsely populated with residential households and some business including livestock owners, owners of cafés and petrol stations, and other businesses along the road, land users including informal people (if any), recreation areas and community users of this area, and road users. Families of roadside graves and those accessing cemeteries and monuments may also be impacted.	Residential households and businesses will be affected indirectly as a result of the construction stage and once the road is operational.	KazAvtoZhol to facilitate regular meetings with the impacted communities/businesses to address their concerns and issues.
Vulnerable Groups	The vulnerable groups within the project area are categorised as families and individuals living below poverty line, families and individuals who receive social allowance, the disabled and individuals with chronic illnesses, illegal households or individuals with no legal rights to their land or non-land assets, women headed households, families with four or more children under the age of 18, low levels of literacy and those living in water stressed areas.	The vulnerable groups will be directly and indirectly affected as a result of the project activities: reduced access rights, potential reduced safety, dust and noise emissions.	KazAvtoZhol to conduct a meaningful consultation with the affected individuals to identify a best solution to improve their livelihood; or provide an alternative living area for them. Focus groups are preferred methods for engagement with this group.
Construction Worker Employees including migrant workers	Local people from nearby villages, workers and any migrant workers (if there will be any)	There will be potential job opportunities for local people from nearby towns and districts. Local women may feel threatened by migration of workers into the area and the potential influx of workers.	KazAvtoZhol to facilitate regular meetings with the impacted workers to address their concerns and issues.
NGOs and international development agencies	UNDP is active in Kazakhstan, focusing on Democratic Governance, Economic Development, Environment and Energy, and Crisis Prevention and Recovery. The website notes 100 active NGOs in the country though there is no knowledge of NGOs currently	UNDP will have direct impact/influence on promotion of environmental protection and development in the region.	KazAvtoZhol to identify any NGOs which might be active in the area.

Type	Name	Impact/Influence	Preferred Method of Engagement
	involved in the stakeholder engagement.		
Trade Unions	There are no trade unions currently established for this project to protect labour/employee's rights.	Trade Unions have direct impact on protection of labour rights and promoting equality and non-discrimination.	KazAvtoZhol/ Construction contractors to conduct monthly meetings with trade unions (if these are established).

4.2 STAKEHOLDERS IDENTIFIED DURING THE DEVELOPMENT OF THIS PLAN

The project stakeholders identified at this stage are presented in Table 4 above, with an analysis of the best ways to engage with them according to the media that they are likely to use and will be most comfortable with. The identification of relevant stakeholders is of crucial importance for the Project implementation process. The land along the road is sparsely populated with residential buildings and businesses, these stakeholders will be directly affected by the Project.

Stakeholders that were not identified during this process should contact the CLO or other members of the local authorities to request their addition to the list.

4.3 VULNERABLE GROUPS

Based on the EBRD definition of vulnerable people, this category includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

Vulnerable groups in the context of displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities, or other displaced persons who may not be protected through national land compensation or land titling legislation.

Based on field observations and interviews, the following categories have been identified as 'Vulnerable' within the project area:

- Families and individuals living below the poverty line (but not recognised or having not requested any type of social allowances);
- Families and individuals who receive Targeted Social Aid (TSA) allowance¹ or other types of allowances such as for disability;
- The disabled and individuals with chronic illnesses;
- Illegal households or individuals with no legal rights to their land or non-land assets (no illegal households were found within the Project area);
- Women headed households;
- Large families with four or more children under the age of 18;
- Individuals with low levels of literacy; and
- Households living in water stressed areas.

¹ In Kazakhstan, according to the Law on Government Targeted Social Aid ((TSA) dated 2001, amended in 2017), families/households with average income per capita below poverty line (defined as 40% of subsistence minimum) are eligible to receive TSA benefit.

4.4 GENDER CONSIDERATIONS

Gender considerations have been considered while designing this SEP and the future engagement methods. Engagement activities are designed to allow for women to participate, i.e. there are accessible locations and timeframes that can accommodate family life and household responsibilities. There are multiple methods for women to get involved in consultations and provide feedback on different aspects of the Project. Women will be consulted on the Project activities.

The Project will account for roadside gender safety considerations. Equal opportunities and non-discrimination (including prevention of gender-based violence and harassment) will form part of the Project's Environmental and Social Action Plan (ESAP).

5 EXISTING AND PREVIOUS STAKEHOLDER CONSULTATIONS

5.1 THE ROAD

5.1.1 OVERVIEW OF EXISTING STAKEHOLDER AND COMMUNITY RELATIONS

Stakeholder engagement and public hearings are a requirement under the Kazakh national legislation.

5.1.2 STAKEHOLDER MEETINGS DURING THE ASSESSMENT

As part of the Environment and Social Due Diligence assessment, six stakeholder engagement meetings were carried out as follows:

- Community meetings;
- Focus Group Discussions;
- Key Information Interviews;
- Additional interviews;
- Meeting with KazAvtoZhol Regional Branch, Kyzylorda; and
- Meeting with Regional Council.

Community Meetings

Key points that arose from the stakeholder community meetings, interviews and observations are summarised in Table 5 as follows:

Table 5: Summary of Key Points from the Stakeholder Meetings at Kyzylorda and Zhezkazgan

Kyzylorda Community Meetings

Two consultation meetings were held at Kyzylorda moderated by Public Opinion Research Institute (PORI) on 22nd and 23rd April 2021 with 7 attendees at each. The attendees expressed a lack of knowledge of the Project and a significant number of questions and concerns were raised at these meetings including:

- Attendees were not aware that this approved project had been presented to the local population by KazAvtoZhol in 2020. Attendees suggested the use of social media to inform the local community about the Project as this is an active means of communication in area. Although it was mentioned that the elderly population would not necessarily use social media, and tend to be informed by newspapers and television.
- The road was described as of strategic importance for passengers and transportation of produce (such as vegetables and berries to the capital), particularly by local entrepreneurs. It was stated that the poor condition of the road was adversely affecting the local community. A high quality road construction was needed.
- The road has been under regular repair for the past 40-50 years and a series of questions for KazAvtoZhol were raised on how the road will be reconstructed, financing, timelines, its classification, who approved it, which company will reconstruct the road, and ongoing maintenance etc.
- Historically, the road has been rehabilitated a number of times, with the road not improving and significantly deteriorating due to lack of proper maintenance after 2 years of use. Concerns were raised that this will recur.
- The road was not suitable for buses from Zhezkazgan to Kyzylorda. Situations were described where the buses would get stuck in the mud and could not pass, and no other vehicles other than all-terrain vehicles could use the road.
- Concern was raised over the lack of mobile phone signal, internet coverage and other services along the road, which are particularly important to respond to vehicle breakdowns and emergencies. It was noted that there are no telephones along the road and the road is barely used. It was specifically mentioned that the road should have service and rest areas

approximately every 100 km along the road, with a polyclinic, tire service, gas station, hotel, etc. also along the route.

- Concerns were raised around the road being a toll road and the impact on the local population. It is thought that people would not drive on this road if they are required to pay for it.
- Water supply and the Syrdarya river is an important issue for the local area as most often there is no water. There was also a concern over problems with communal services.
- Employment for the Kyzylorda population is also a concern for the area. Questions were raised as to how many companies in the region will be involved in the project. The view was expressed that local companies want to get involved in the construction of this road, which belongs to their region.
- Concern was also raised on the impact of the Project on nature. It is reported that the Turgai Steppe is inhabited by Saiga antelope that migrate across this area. They cross without noticing the road and as such it is advised that there should be some restrictive measures and stops along the road.

Zhezkazgan Community Meetings

Two consultation meetings were held at Zhezkazgan moderated by PORI on 14th April 2021 with 7 attendees and 5 attendees respectively. Points raised at these meetings include:

- Some attendees were informed of the Project in 2021 on Kazakhstan television, and are happy with the Project as it will be beneficial to the local communities, including potential employment for young people in the area. There is uncertainty as to whether the Project will actually be completed given the delays.
- Concerns were raised over the provision of services along the route alignment for food, to dispose of waste and use amenities, and the lack of communication and internet connection along the road particularly during emergency situations. Additional concerns highlighted that wolves roam the area.
- There are many unemployed people in the area that could potentially benefit if cafes and automobile tire repair shops are opened along the road. There used to be a teahouse along the road, but the owners closed it due to the fact that it was not economically viable.
- Concerns were expressed over the poor quality of the road with mud and potholes across the alignment which creates dust and slows travel along the alignment with vehicles reported to have become stuck in the road.
- The rehabilitation of the road will provide a faster route to services such as medical and dental treatment and retail facilities. It will also facilitate cheaper transport of produce (vegetables and fruits) in the area. In addition, medical students will use the new road to travel to university for their courses.
- Questions were raised as to whether the rehabilitated road will be a toll road. Other toll roads are 3 or 4 lanes whilst this proposed road is only 2 lanes.
- The development of tourism in the area is important and the road will continue to promote tourism from Turkestan to Ulytau. It was noted that food and clothes in the area are expensive and it is anticipated that the cost would be cheaper with the improvements to the road.
- Concerns were raised around road safety and the number of accidents. This has been presented in local media.
- The road needs to be designed to accommodate the trucks that will use the road, it was reported that 40 ton KAMAZ trucks have significantly damaged the road surface in the past.

Focus Group Discussions

Four focus group discussions were carried out, as detailed in Table 6 below.

Table 6: Focus Group Discussions

Focus Group Location	Date	Focus Group Type	Number of Attendees
Dosan Village	11 th April 2021	Focus Group – Kyzylorda general population	12 – 11 full time employees and 1 teacher
Kyzylorda	12 th April 2021	Women only focus group	12 – 1 housewife, 2 students, 1 employee, 2 teachers, 2 unemployed people and 4 entrepreneurs
Zhezkazgan	14 th April 2021	Focus Group – Zhezkazgan general population	11 – 3 housewives, 5 full time employees, 1 entrepreneur, 1 unemployed person and 1 teacher
Zhezkazgan	22 nd April 2021	Entrepreneurs	13 – 13 entrepreneurs, 2 of which are also employed as IT specialists and teacher

Four focus group discussions were moderated by PORI on 11th, 12th, 14th and 22nd April 2021. The attendees had general knowledge of the Project and a summary is provided in Table 7 below:

Table 7: Summary of Key Points from the Focus Group Discussions

Summary of General Concerns/Points Raised
<ul style="list-style-type: none"> ■ Attendees had heard of the proposed road rehabilitation project from Kyzylorda web-site (information provided on the construction works) but also on social media, Instagram and through relatives and acquaintances. ■ Those living outside of the city use the road to travel into the city and to visit relatives, purchase food, for employment, to visit a clinic for medical attention and attend schools for education. ■ The number of road accidents appears to have increased over the last 2 years. Every year there is a fatality. Accidents are attributed to poor road conditions and lighting. It is anticipated that the project will renew the road and include cameras. ■ It was suggested that it would probably be better to have lighting along the road alignment. The road should be lit and of good quality. ■ The current road condition has damaged cars (tires and undercarriage). ■ There were no comments on the potential influx of workers into the local area during construction. ■ Internet access, mobile connection and electricity supply in the area are not good. In the event of a vehicle breakdown there is a real danger to life. ■ There are conflicting views around the use of tolls for the road. Some feel that the roads will be better maintained if tolls are implemented, whilst others are not keen to pay fees to use the road. There are some suggestions that there should be two separate roads, one for cars and one for trucks. ■ Concerns were raised about the materials to be used for construction of the road given the climatic conditions in the area e.g. the potential for asphalt melting and concrete cracking in extreme heat, and if a concrete road surface is used it may be more slick during wet and freezing conditions. ■ Suggestions were made that it would be necessary to engage with farmers in relation to specific aspects of the project and agree satisfactory conditions for both parties prior to construction works. ■ There are Saigas in the region and their migration should be considered as part of the Project. ■ There were no concerns around gender inequality generally or specific women’s issues in the regions, however a concern was raised around employment of women of child bearing age. ■ It is reported that there is a significant issue with irrigation in the area. The local community suggest that they need irrigation water from canals and ditches to be built. ■ Project benefits raised included: <ul style="list-style-type: none"> ● This is a Project that is needed within the community; ● People on the road will benefit from a good transport experience and links; ● Improved social infrastructure along the alignment resulting in a positive impact on trade (opportunity for kiosks, supermarkets and teahouses along the road and expansion of existing cafes, petrol station/service areas, car parks, rest areas and amenities);

- Increased social interaction and communication;
- Increased use of public transport resulting in environmental benefits;
- Potential reduction in car accidents and damage to vehicles;
- Reduced travel time;
- Increase tourism;
- Market prices for Zhezkazgan could be normalised for the population; and
- Increased job opportunities for example ability to sell goods such as home wares, and crops.
- Issues relating to the Project include:
 - Road lane closures during construction;
 - Sources of income disrupted for small and medium-sized businesses along the road;
 - Potential corruption issues (particularly in relation to tendering, procurement and access to health care provision);
 - Issues relating to public transport around pricing (particularly for pensioners), disabled access and poor driver practices (driving under the influence of alcohol, falling asleep, use of phones etc.);
 - Disruption to cattle herders that use land across the road alignment for grazing purposes;
 - The road is currently dusty and will be dusty during construction;
 - When road is built, it is envisaged that there will be more cars, more accidents and more children on the road. It is stated that it will be necessary to place signs for pedestrians; and
 - Difficulties with people and cattle crossing the rehabilitated road safely. There have been instances of livestock being hit, impacting on local livelihoods. A suggestion was made that consideration should be given to including fencing as part of road rehabilitation.

Specific concerns of the focus group are detailed in Table 8 below:

Table 8: Specific Concerns from the Focus Group Discussions

- Dosan/Abai Village specific concerns**
- Dosan Village would like to have an access road from Dosan Village and have their own bus route.
 - It is reported that the road was repaired in Dosan village in 2021 and Dosan village has been connected to the gas network.
 - A new housing development within Dosan village will lead to an increase in number of employees and also potentially expand the Dosan village school (from 9 grades to 11 grades); and
 - There are many tenants in Dosan village that come from different places, such as Shiyeli, and work in the city. The cost of rent in Dosan village is cheaper.
 - There are seasonal workers in Dosan village who tend to work in agriculture (predominantly in rice crop production and livestock) from about spring.
 - There is a brick factory near Dosan village and concerns were raised about the odour. The brick factory uses coal and not gas in their production activities. Villagers state that they cannot breathe so they do not open the windows.
 - There is no bath house in Dosan village. Residents have built as much as they can individually, but it is reported that individuals do go to the city for a bath.
 - There are socially vulnerable groups within the villages of Dosan and Abai, elderly and approximately 10-15 disabled people. Support is reported to be available in Abai. There is no road in Dosan village, and it is reported that as a result the ambulance cannot access the village.
 - There is no road, so such individuals need to walk to access medical care from the clinic. The main issue for individuals with disabilities is reported to be travelling to the clinic in Abai and then the city, if needed, to see a doctor.
 - In terms of assistance for vulnerable groups, attendees stated that they would request road lighting and irrigation water for planting.
 - Attendees felt that complaints raised with akims were not addressed and they did not feel listened to.
 - Since the gas connection was installed in Dosan village 2 years ago, the gas is reported to have not been installed properly and as such tends to go out in the winter during poor weather conditions. This was raised with the akim and the gas department chief but does not appear to have been resolved. Security is reportedly not maintained.
 - Illiteracy is reported to be an issue in the event of a road accident.

- If the road is built, both sides should be lit, at least as far as Dosan.
- Project information is posted on social media. Abai village and Dosan village information is communicated by village social media group chats; there are two chats. One person from each household is on the chat.
- Attendees would like to see a polyclinic, pharmacy and kindergarten built in Dosan village.
- Dosan Village already has a large school, located close to the highway and a lot of KAMAZ trucks. Parents are afraid to send their children to school on their own as the cars travel fast. It was suggested that it would be good to build a special sidewalk. It was also stated that it is difficult for children to cross the street as there are no pedestrians' walkways.

Women only specific concerns

- Employers tend not to employ women who are recently married or have babies / young children.

Zhezkazgan specific concerns

- Concerns were raised around construction of a gas pipeline as part of a separate Project where the community were not consulted, and fragmentation issues have arisen. Requests were made for these fragmentation issues to be resolved by implementation of access roads.

Key Informant Interviews²

Twenty-one key informant interviews (KIIs) were carried out, as detailed in Table 9 below:

Table 9: Key Informant Interviews

Type of Engagement	Attendees	Dates
Key Informant Interview	1. Mereke Myrzabekova - Department of Internal Policy of Zhezkazgan	19/04/2021 11:00
	2. Zhangeldi Konyrbayev - Akim of Mibulak village	20/04/2021 12:00
	3. Margulan Seidakhmetov - Department of Land Relations in Zhezkazgan	21/04/2021 11:30
	4. Yerzhan Yesset - Representative of Housing and communal services in Zhezkazgan	21/04/2021 15:00
	5. Arman Kenzhebek - Maslikhat of Zhezkazgan	26/04/2021 12:00
	6. Sagyndyk Kozhamseitov - Public Council	26/04/2021 16:00
	7. Farkhat Nurdauletov - Department of Entrepreneurship and Agriculture of Zhezkazgan	27/04/2021 19:00
	8. Yerzhan Samanov - Entrepreneur	29/04/2021 12:34
	9. Rahysh Idrissova - Public Association "Ulytau Kyzdar"	28/04/2021 11:35
	10. Oryntai Saduov - Entrepreneur	29/04/2021 10:20
	11. Asip Baikosinov - Council of Veterans	30/04/2021 15:32
	12. Yessenzhol Nazarov - Chairman of the public association "Eco-service"	13/04/2021 11:48
	13. Talgat Menlibayev - Public activist	14/04/2021 13:51
	14. Olzhas Zhaganbekuly - Head of the organizational control department of the Department of State Revenues	13/04/2021 11:37
	15. Maksat Dauylbai - Deputy Director of the Regional Youth Resource Center	14/04/2021 13:28

² Key informant interviews are qualitative in-depth interviews with people who know what is going on in the community. The purpose of key informant interviews is to collect information from a wide range of people—including community leaders, professionals, or residents—who have first-hand knowledge about the community.

16. Mukhtar Mustayap - Teacher of transport operation and organization of traffic and transportation Korkyt Ata Kyzylorda University	21/04/2021 13:34
17. Alibek Zhappasbayev - Specialist of the ideology department of the regional Nur Otan party	22/04/2021 19:34
18. Bauyrzhan Zhussipbekov - Kyzylorda-Karaganda driver of passenger transport	17/04/2021 21:59
19. Zhandos Orazmakhanov - Director of Kyzylorda Business Hub LLP	13/04/2021 16:13
20. Talgat Tilesov - Executive Director of the Association "Syr Umit"	13/04/2021 19:11
21. Zhanat Shamshatkyzy - School principal in Dosan village	09/04/2021 11:20

All of the individuals, except one, confirmed that they were aware of the Project.

Project benefits and concerns were discussed with each key informant and largely align with the views expressed in the community meetings and Focus Group Discussion summarised above. Any variations are summarised in Table 10 below:

Table 10: Additional Benefits and Concerns raised through the KII's

<ul style="list-style-type: none"> ■ Benefits seen as a positive impact on freight transportation between countries, (e.g. Russia) and for businesses including petrol stations, cafes and service areas, brick works and a quarry. ■ Trains and air tickets are expensive. ■ Post construction, the areas no longer required for the service roads should be returned to their initial stage and if possible, biodiversity improvements such as tree planting should be implemented. This could prove to be difficult as there are water shortages in the area. ■ It was suggested that landscaping may help to mitigate constant wind and dust. ■ Lack of water for planting, livestock and crops is an issue. ■ Illegal hunting was being carried out within the community, it is not known which animals are being hunted but it should be noted that Saiga are IUCN critically endangered and known to be present in the area. ■ The Project provides an opportunity to develop commercial tourism. ■ An individual advised that they had expected and wanted the road to have at least 3 lanes to Zhezkazgan, and 3 lanes to Kyzylorda. ■ A suggestion was made to provide services every 50 km along the road alignment. ■ An individual suggested that the problem with the project is bribery. ■ Another issue is lack of sidewalks on many streets, which in turn forces people to walk along the road. ■ Gas does not reach the suburbs of the city, which belong to the city and there are poor quality asphalt roads, both inside and outside the city. ■ The issue of drinking water quality is still not completely solved. ■ During stormy weather cars collide as drivers don't see each other. ■ A suggestion was provided for modern hotels to be constructed along the alignment, along with other facilities previously mentioned in the community meetings and Focus Group Discussions. ■ Important commodities such as gas, oil and coal are transported along the route. The region has the Kumkol field that provides Kazakhstan with fuel oil and other types of fuel. This means that large vehicles of 40 ton are using the road. ■ Additional vulnerable groups were identified including; people from neighbouring Uzbekistan who come to seek employment, but employment is limited, and there are homeless people with unfortunate family situations and homeless people that are addicted to alcohol. ■ There are no hospitals and emergency departments because the construction is located on the outskirts of the town. Without mobile medical centers, it will be difficult to provide medical services. It is especially dangerous for those who work there due to exposure to extreme weather conditions. ■ An important issue was raised in relation to the health and safety of current road users and lack of emergency response provision due to the current state of the road. ■ Issues with infrastructure for wastewater were highlighted. ■ The number of oncological diseases in the region has increased.

- There is the potential for construction camp sites and related benefits for local businesses.
- It was suggested that if the road is to be tolled, it should be a good quality four-way road.
- An individual advised that around 44 peasant farms exist along the road. Animals also need an underground passage. It was advised that the road goes along the river, and as a result drains must be included in design. Recently, rivers are almost dry.
- Cattle theft occurs sometimes.
- To enhance tourism in the area it was suggested that for every 100-150 km it would be good to provide historical information, about the land and area.
- A suggestion was made to consider access roads for Zhomart mine (produced by the Kazakhmys corporation), not far from Zhezkazgan. This section of the alignment is not within the scope of this Project.
- It is reported that in Zhezkazgan, there are people with disabilities and some believe it is as a result of the new copper plant emitting sulfuric acid at night, sometimes for up to 28 minutes per evening.

Additional Interviews

Additional interviews were carried out as part of this assessment with housing and communal services on 14th April 2021 and truck drivers and older residents of Talap on 15th April 2021. All were aware of the Project through social media and the media.

Project benefits and concerns were discussed with each additional interviewee and largely align with the views expressed in the stakeholder engagement activities summarised above. Any variations are summarised below:

Housing and communal services

Project benefits include additional accessibility for students to undertake further education such as universities.

Drivers

The driver interviewed expressed a positive opinion for the Project in relation to their deliveries to avoid damage to produce being transported.

Older residents

Concerns were expressed around the potential for removal of tea houses and gas stations, and limited access to cemeteries. Talap village mostly consists of individuals of retirement age. During winter, access roads connecting Talap village to the road become more difficult, and buses do not run.

Meeting with KazAvtoZhol Regional Branch, Kyzylorda (15/03/21)

The meeting agenda was a presentation of the detailed design of Kyzylorda-Zhezkazgan road rehabilitation; and EBRD's Social and Environmental Policy.

The key points that were discussed are summarised in Table 11 below as follows:

Table 11: Key Points from the Meeting with KazAvtoZhol Regional Branch

EcoSocio Analysts LLP, local partner of WSP, explained that the purpose of the meeting was to provide an explanation in relation to the EBRD's Social and Environmental Policy requirements and principles, the project team work methods, collection of the required information for the implementation of Kyzylorda-Zhezkazgan road rehabilitation project to meet EBRD requirements for the loan. Kyzylorda Regional Branch of KazAvtoZhol and Kazdorproekt gave assurance that support and assistance will be provided to EBRD consultants in collecting the information.

Sangharama Myrzabai (Deputy Director of Kyzylorda Regional Branch of KazAvtoZhol) stated that:

- Around 120 km (over half the road) of the Kyzylorda-Zhezkazgan road did not have crushed stone pavement, of the section in Kyzylorda Region. No major repairs had been carried out for half a

century. The disrepair of the road had been a major topical issue for road sector specialists over many years and a dream is close to being fulfilled for drivers when the road is rehabilitated.

- During the autumn, spring and winter seasons, the road is potentially dangerous to the lives of drivers and passengers. During storms, the road is muddy with potholes.
- Reconstruction of the republican road Kyzylorda-Pavlodar-Uspenka-border of the Russian Federation, which includes Kyzylorda-Zhezkazgan section, is very important for Kazakhstan.
- Despite warnings, thousands of Kazakhstani drivers prefer to use this route, as it directly connects the southern regions of the country with the central and northern regions. The Zhezkazgan road reduces the distance to Nur-Sultan by 700-800 km saving travel time significantly.
- The road is used by private traders and also, for the most part by vehicles owned by businesses to the south – from a number of cities of the Karaganda and Akmola Regions and Nur-Sultan, to the north – from Kyzylorda and Turkestan Regions and the republican city Shymkent.
- Trucks and articulated lorries transport agricultural goods including livestock, construction materials and other goods every day.
- Passenger transport companies with medium and small intercity buses and minivans use the road as there is a demand for passenger transportation throughout the year.
- There is a high traffic intensity on the road Kyzylorda-Pavlodar-Uspenka-Border of the Russian Federation of about 1700 vehicles per day. The poor quality of Kyzylorda-Zhezkazgan road section often leads to vehicle breakdowns and accidents, in particular rollovers and crashes.
- The issue of urgent repair of the road has repeatedly been raised at various levels, including the Senate of the Republic of Kazakhstan.
- The road pavement will be made with hard cover SMA – stone-mastic asphalt concrete. The width of the two-lane asphalt carriageway will be 9m, the roadbed – 15m.
- The wishes of the population in relation to the construction of drains and underground crossings for domestic and wild animals has been considered.
- The border of the region with Karaganda is located at the 216th km point of the road.
- The road distance is divided into 6 lots.
- According to the design, a bypass road with a length of 15 km, which starts at the entrance to Kyzylorda from Shiyeli Region (at the 1827th km of M-32 Samara-Shymkent road) and connects at the junction at the 25th km of the road to Zhezkazgan, will acquire the status of a Category I road. It will be a four-lane road with lighting. The remaining 191 km (from 25 km to 216 km) to Zhezkazgan will be Category II. The section from 12 km to 24 is also Category II.
- All these works are included in Lot No. 1 of the design and estimate documents, which is currently undergoing examination by state expertise.
- It is expected that about 2,500 workers will be employed during construction and installation works, of which 750 people should be attracted from the local population.
- After construction of 12 km, the road at the exit from Kyzylorda will be transferred to the city to maintain it. KazAvtoZhol will maintain the remaining section.
- The construction of the Kyzylorda-Zhezkazgan road is very important for the region and KazAvtoZhol and local executive bodies will provide any assistance in the implementation of this road reconstruction project.

Meeting with Regional Council (17/03/21)

A brief description of the participants opinion is provided in Table 12 below as follows:

Table 12: Key Points from the Meeting with Regional Council

The local authorities were well disposed for the implementation of the project and ready to provide comprehensive assistance in its implementation as they believe the road rehabilitation will open up opportunities for development of small businesses along the road such as cafes, shops, petrol and service stations. It is also believed that the road rehabilitation will improve the public transport connection and freight transfer like coal from Karaganda to Kyzylorda, Turkestan regions and agricultural products to Karaganda Region. The project will improve employment, increase taxes and other contributions to the local budget. As a result of the project, it was also hoped that mobile network operators extend their coverage along the road beyond the existing 15 km from Kyzylorda.

6 STAKEHOLDER ENGAGEMENT PROGRAMME

6.1 DISCLOSURE OF INFORMATION

The types of information to be disclosed and the specific methods of communication to be undertaken by the local authorities for this project are summarised in the Stakeholder Engagement Programme in Table 13 further below. The objectives of external communications are to provide continuous engagement with affected people and other relevant stakeholders and to inform them about the activities, performance, development and implementation of the project. The information to be disclosed publicly are governed by EBRD's Public Information Policy, PR 10 and Kazakh national legislation.

The following provides a list of potential environmental and social risks that are associated with (but not limited to) the Project:

- Pollutants and emissions to atmosphere from construction and use of vehicles;
- Noise and vibration from use of road construction processes;
- Pollution of surface water from road vehicles, filling of vehicles with fuel and oils etc.;
- Pollution of soil during the construction period due to spillages of lubricating materials, fuel, bitumen etc;
- Dust pollution during construction works;
- Local discomfort and nuisance to families, women and the elderly;
- The risks of collisions and accidents with livestock and other animals;
- Water usage and resource efficiency given that water availability is limited;
- Impact on local Saiga population in the area;
- Community accessibility and fragmentation during construction activities;
- Livelihood impacts (livestock grazing, roadside businesses and entrepreneurs);
- Local disturbance associated with construction workers;
- Impact on women's safety resulting from migration of workers into the area; and
- Access to memorials and cemeteries and protection between memorial structures and high speed traffic.

Therefore, this SEP has been developed to address community concerns with regards to key environmental and social risks through implementation of the stakeholder consultation and information disclosure activities (Table 13).

6.2 STAKEHOLDER CONSULTATIONS AND INFORMATION DISCLOSURE

The stakeholder consultation and information disclosure will cover the following main tasks:

- Timely disclosure of Project information in Kazakh/Russian languages to the key stakeholders;
- Informed participation and meaningful two-way consultation with the affected stakeholders; and
- Development and implementation of a grievance mechanism to ensure that the affected stakeholders' concerns and issues are addressed.

6.2.1 INFORMATION DISCLOSURE ACTIVITIES

KazAvtoZhol will disclose relevant information about the investment work at the early stage of the Project during detailed design and then as appropriate throughout the Project. At this stage, the following documents will be disclosed for effective stakeholder communication:

- Non-Technical Summary (NTS);

- Environmental and Social Action Plan (ESAP);
- Stakeholder Engagement Plan (SEP) – This document;
- Land Acquisition and Resettlement Framework (LARF); and
- Brochures and leaflets are to include a summary of project activities, including timeline for expected disruption and access restrictions, and key associated risks.

The information above will be accessible to the public, including the affected communities. The hard copies of the related documents will be available at the KazAvtoZhol offices in both Nur-Sultan (head office), Kyzylorda and the district Akimats offices.

The project information including potential job opportunities will be advertised on bulletin boards in community centres and the media. Brochures and leaflets will also be published to update the public about the project progress and stages.

6.3 CONSULTATION METHODS

The main communication methods and mechanisms that will be used to consult with key stakeholders are presented below.

6.3.1 REGULATORY MEETINGS

KazAvtoZhol will consult with the governmental organisations on all the related permits or licences and any EIA requirements for the project. KazAvtoZhol will also discuss planning and development requirements with relevant organisations.

6.3.2 LOCAL PIU MEETINGS

It is recommended that the client conduct regular meetings as part of the local PIU mandate. Monthly regular meetings should be undertaken at the client head office to discuss the following:

- Overall supervision of Project activities (technical, financial, and delivery of the Project);
- Drafting of Terms of References and management of local consultants;
- Implementation of other activities identified including training and information exchange for implementation of the upgrades;
- Holding seminars and workshops for the development of the skills;
- Discuss social opportunities (including employment) for local communities; and
- Discuss solutions to reduce impacts associated with access rights and temporary obstruction of businesses.

6.3.3 CONSULTATION WITH AFFECTED INDIVIDUALS AND VULNERABLE GROUPS

Some consultations have already been carried out and are as described in Section 5.

A number of further consultations are recommended prior to the construction phase of the project for affected individuals and vulnerable groups:

Households and Businesses Nearby the Road

Affected People

There are a small number of people who live near the road who will be impacted by increased vehicle traffic from construction vehicles. It is recommended that they are consulted in order to mitigate the impact to the households that are located near to the road. In addition, construction camps will be in operation along the route (the number of which is yet to be finalised). The labour influx (potentially if foreign contractors are to be appointed) is anticipated to pose a significant disturbance to the community. It is therefore recommended that the local community are consulted in order to determine the optimal location of these sites. Along the

site there are petrol stations, brick works, a quarry, cafes, service / recreation areas and agricultural / farming businesses. During the three-year construction period, it is anticipated that parts of the road will be blocked. A consultation process with the business/service owners will ensure minimum impacts on their livelihood and a LARF has been developed to address potential impacts.

Livestock farmers

A consultation process is also recommended with the livestock farmers who are operating along the project route. The road poses a significant danger to both the livestock and their owners working along the road. The livestock owners could also provide invaluable advice as to where the underpasses should be located as part of the final design. This is particularly relevant for the livestock farmers that are involved in livestock breeding.

6.3.4 FOCUS GROUPS

Focus groups will be conducted with the identified vulnerable groups i.e. the disabled, women, informal/illegal people and people in receipt of social benefits. A simple non-technical language will be used to ensure that the project impacts are communicated transparently to this group.

The Akimats in the affected districts will play an important role in consultation with the affected community. In advance information and notification will be issued to the community prior to construction activities.

6.4 THE FUTURE PROGRAMME

The envisaged programme of public consultation and disclosure activities are presented in Table 13 below. This programme includes immediate consultation and engagement activities required to address current stakeholder concerns, as well as regular consultation and disclosure activities throughout the project life cycle.

Contact details and responsibilities for SEP implementation are as follows:

Branch: KAZH Kyzylorda Regional Office
Name: Aliakbar Myrzabai
Title: Head of Quality Control and Acceptance Department
Telephone: + 7 701 174 86 05
Address: Kyzylorda Regional branch of KAZH, Kyzylorda, Zheltoksan str 18
Email: aliakbar.myrzabay@qaj.kz
Website: <https://ru.qaj.kz>

The local authorities and the CLO will collate any comments and feedback associated with this project and will document these.

All comments received will be reviewed in accordance with the commitments made under 'Best International Practice' as documented in Section 3.3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Stakeholder Engagement Programme is detailed in Table 13 below.

Table 13: Future Stakeholder Engagement Programme

Activity	Stakeholders	Information Materials/ Communication methods	Information to be disclosed	Timeframe / Frequency	Responsibility	Location
Allocate a Project Community Liaison Officer in the region	Affected people, residents and owners / employees of local business	Information boards with post box, personal visits, community meetings.	NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any)	Immediate	KazAvtoZhol	In the project area/Kyzylorda Region
Place hard copies of SEP and Project leaflets at KazAvtoZhol head office in Nur-Sultan, Kyzylorda office, the district Akimat offices	Affected communities within the vicinity of the road	Information board, mass media, internet, documents, face to face meetings at Akimat offices	NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any)	Immediate	Project CLO	KazAvtoZhol head offices and Akimat offices
Communication of project and potential job opportunities	Regional public	Newspapers, radio, internet, local job centres	NTS, grievance mechanism, vacancies	Prior to construction	KazAvtoZhol	KazAvtoZhol head offices and Akimat offices
Review and discuss Project environmental monitoring requirements with Ministry of Environment	Regional public	Telephone, e-mails, face to face meetings	Detailed project information and NTS on request	Construction, Operation stage, then on-going	KazAvtoZhol	The Ministry Office
Consult regularly with trade unions, NGOs, communities on promotion of labour rights and provision of employment opportunities for local people and human rights for migratory workers	Suppliers of goods and services	Information boards	NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection requirements, grievance mechanism	Prior to construction phase and on-going	Project CLO in collaboration with HR Department of KazAvtoZhol and Trade Unions (if established)	Akimat offices

Activity	Stakeholders	Information Materials/ Communication methods	Information to be disclosed	Timeframe / Frequency	Responsibility	Location
Hold regular community meetings at residential areas nearby the construction sites	Residents and district councils	Meetings, telephone, e-mail, information boards in council buildings, community meetings	EIA, EIA supplements, NTS, SEP, ESAP, vacancies, location of bus stops etc.	Immediate, then monthly	Project CLO in collaboration with local Akimats	Akimat offices
Communicate vacancies and workers' rights	Construction and maintenance workers	Information boards and meetings in construction camp canteen	Vacancies, employee HR procedures etc	During the project lifetime	KazAvtoZhol	Camps and offices
Facilitate focus groups and workshops for affected vulnerable groups, households near to construction, informal/illegal people (if any), women and the disabled	Vulnerable groups including households located near the construction activities and women	Face to face workshops, radio, round table meetings	SEP, NTS, Presentation of materials for vulnerable group	Prior to and during construction stage	Project CLO in collaboration with Akimats	Village community centres or Akimat offices
Facilitate focus groups for relatives of motorway accident victims, particularly in respect of those monuments that are still cared for and visited	Families/ relatives of motorway accident victims whose monuments within the 50 m meter boundary of the construction of the road	Meetings, individual visits, telephone, emails	SEP, NTS	Prior to construction and during the project lifetime	Project CLO in collaboration with Akimats	Village community centres or Akimat offices

7 REPORTING AND GRIEVANCES

7.1 MONITORING, REPORTING AND FEEDBACK MECHANISMS

The local authorities and the CLO will monitor the communication channels such as media, one-to-one meetings and periodic meetings and will provide feedback as appropriate. A grievance and suggestion book (“open book”) will be available for stakeholders participating in public consultation meetings and will be available at the mayor’s office to record comments anonymously. This book will be presented in an obvious area of the exhibition but in an area, that will not be directly monitored by host staff (e.g. by the exit). The local authorities and the CLO will record this information so that a response and feedback can be provided for stakeholders.

Independent consultants in line with annual monitoring of the ESAP implementation should undertake annual monitoring of the SEP implementation including the implementation of the grievance mechanism. This will include the examination of documentation on public hearings, information disclosure and any other form of stakeholder engagement undertaken as part of the SEP.

7.2 GRIEVANCE MECHANISM

According to the Kazakhstan legal and administrative structure, introduction of dispute settlement procedures is the responsibility of local authorities (Akimats) and representatives of the project benefactor (CoR Kyzylorda region). The intended officials were appointed to these positions to assist in resolution of messages or submission of complaints, received from the Affected persons and the public.

The complaint procedures related to the project, are to ensure efficient and systematic mechanism for the project to answer questions, to provide feedback and complaints from those whose interests are affected, other stakeholders and the public.

Levels and Procedures of Grievance Mechanism

The grievance mechanism (GM) is available for those who live or work in the areas falling under the potential impact of the project activities. Anyone who has experienced the impact or is concerned by the project activity has the right to participate in the GM, to have easy access to it and receive assistance in its use. The proposed GM does not replace the public mechanisms for resolving grievances and conflicts, provided by the legal system of the Republic of Kazakhstan, but tries to minimize its use as much as possible.

Overall responsibility for the timely implementation of the GM lies on the CoR and KazAvtoZhol. Relevant regional, district and village Akimats, authorized by the law to carry out tasks, related to the complaints, and mediators / non-governmental organizations (NGOs) that are involved in promoting the amicable resolution of complaints, are also included in the GM.

This GM provides two levels of resolution of complaints on projects of the road sector, implemented under the leadership of the CoR: Complaints Committee (CC) at the regional (oblast) and central (Nur-Sultan) levels in accordance with the Guidelines for grievance mechanism for environmental and social protection measures of the road sector projects, approved by the CoR in August in 2014. The Complaints Committee (CC) is composed of members appointed by the CoR, local government offices, KazAvtoZhol. Complaints Committee (CC) at regional and central levels are chaired by managers responsible for the overall operation of the GM and effectiveness and timely implementation, while the

coordinators are responsible for involvement of the parties concerned and coordination of the CC at regional / central levels.

Regional Level (Kyzylorda region)

At the first phase, an attempt will be made to resolve complaints via the GM at the regional level through the following steps.

Registration of complaints: bidders or the concerned persons may visit, call or send a letter in a paper or electronic format, and through fax to the Akimat of the settlement, coordinator for complaints of the Building Contractor and Project Management Contractor, coordinator of the CC in the oblast branch of KazAvtoZhol. Reception of complaints, submitted personally, through the phone, letter or email or fax will be confirmed. The CC at the regional level also considers anonymous complaints in case a bidder rejects to provide contact information or if the contact information is not given in the complaint, received in a paper / electronic format / fax.

Processing of complaints: Requests and complaints in respect of which an explanation and a decision were made at the time of reception are closed immediately. Cases requiring further assessment and action are considered by the CC at the regional level. The CC at the regional level: (i) meets twice a month, but special meetings for specific cases can be arranged as required; and (ii) discusses a complaint within ten working days and recommends its settlement to the parties. The CC Coordinator at the regional level spreads the corresponding information among the CC members, prepares the minutes of the CC meetings and reports on the work progress and ensures that the actions and decisions are properly documented.

Providing Feedback: Reception of complaints filed in person or by telephone will be confirmed. Reception of complaints received in writing or by e-mail or confirmed by letter / e-mail / fax within 3 working days of receipt by the CC coordinator at the regional level. If a complaint is not related to project activities and impacts that have emerged as a result of the project's fulfilment and cannot be considered in the framework of the GM Guidelines, the feedback will be provided to the complainant, indicating the body (level of the akimat of municipality / district / regional akimat, respectively), where it was sent.

If a complaint is resolved at the regional level, the complainant will be informed about the results. If a complaint is not resolved at the regional level and is submitted to the CC at the central level for consideration and solution, the relevant information will be presented by the complainant, including the date when the case was forwarded to the CC at the central level and the date when the decision is expected at the central level.

In the case of anonymous complaints, a response in a paper form will be placed on the information board of the corresponding regional branch of KazAvtoZhol, as well as on the information board of the respective akimat, so that the complainant could come and see the response.

Central Level

After an inconclusive consideration of the complaint by the CC at the regional level, an attempt will be made to resolve the complaint at the central level through the following steps.

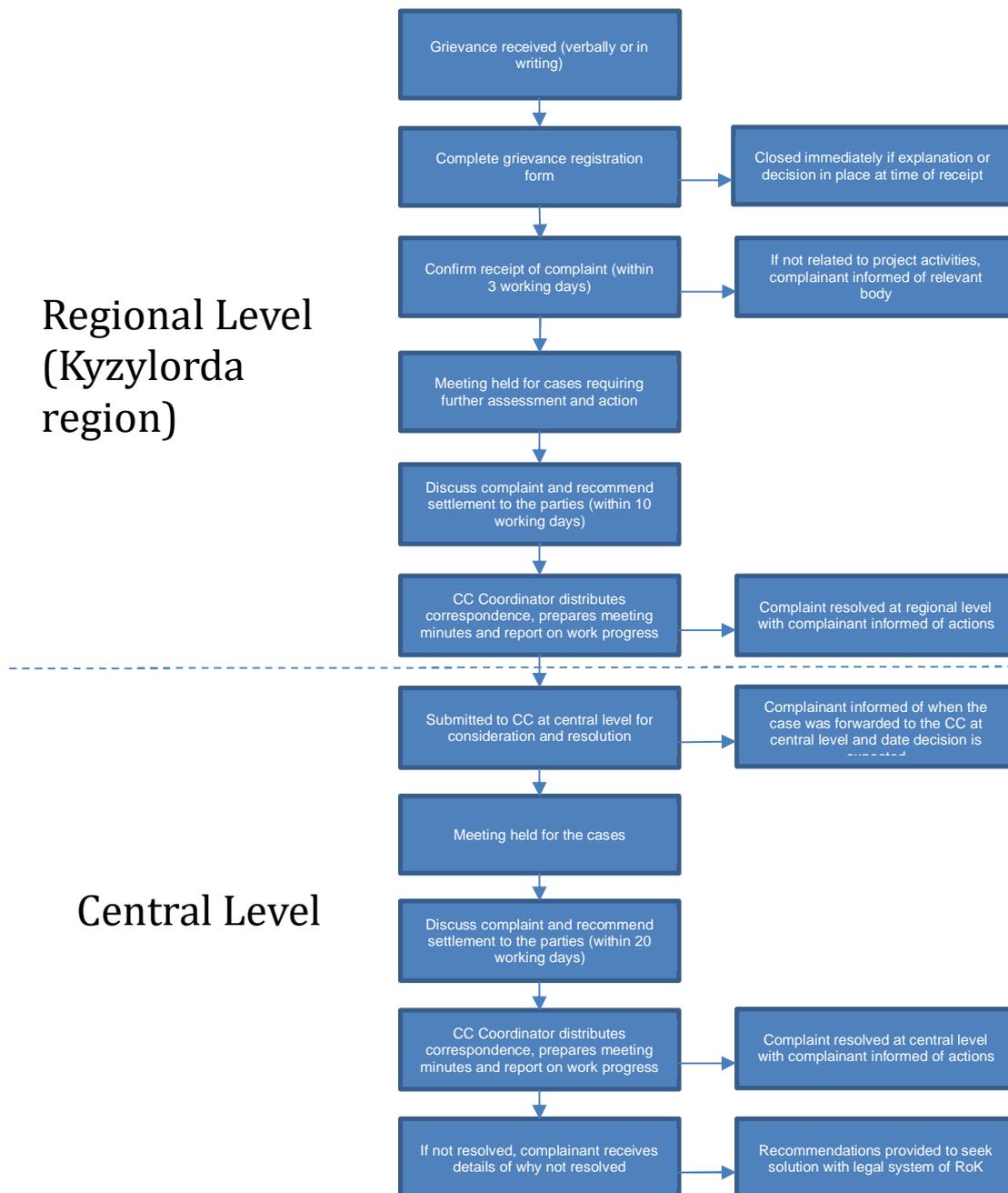
Processing of complaints: If the complaint cannot be solved with the help of the CC at the regional level, it will be submitted to the CC at the central level, including all the relevant documents. The CC at the central level: (i) meets on a monthly basis, but special meetings for specific cases can be arranged as required; and (ii) discusses the complaint within twenty working days and recommends its settlement to the parties. The CC coordinator at the central level disseminates relevant information among the CC members, preparing minutes of

meetings and reports on progress of the work and ensures that the actions and decisions are properly documented.

Providing feedback: If a complaint has been resolved, the complaining party will be informed of the results of the decision on the appeal. If a complaint has not been resolved by the CC at the central level, the relevant information will be provided to the complaining party, including the details of why the case has not been resolved and the recommendations to seek a solution within the legal system of the Republic of Kazakhstan. In the case of anonymous complaints, or if the person who filed the complaint has refused to provide contact details, the response in paper form will be placed on the information board of the corresponding regional branch of KazAvtoZhol, local government offices and related localities / district / regional akimats.

An overview of these regional and central level grievance procedures are presented in Figure 7 below:

Figure 7 – Grievance mechanism flowchart



Legal System

If, after intervention and assistance of the CC at the regional and central levels a decision was not reached, and if a complaint is not satisfied with the complaints system, the case will be submitted to the court for consideration in accordance with the laws of the Republic of Kazakhstan.

At the same time, it should be emphasized that the CC Guidelines do not limit the right of the complaining party to submit the case to court in the first stage of the complaint process.

Coordinators on complaints: The affected individuals and other interested parties may visit, call and send a letter or fax to the CC at the regional level for Atyrau region.

Contact information of the CC (regional level):

Address: Kyzylorda regional branch of KAZH, Kyzylorda, Zheltoksan str 18 Tel: 8 (7242) - 26-25-37 E-mail: ouad_kzlorda@mail.ru
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Regional CC in Kyzylorda region:

- The CC Head: Aliakbar Myrzabai

CC key person at the central level:

- The CC Head: Garyshzhan Nagmanov

7.3 ROLES AND RESPONSIBILITIES

The client and the CLO in collaboration with local authorities will have the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments/complaints and responding to any such comments and complaints. Depending on the nature of a comment/complaint, some comments or complaints will be provided to the appropriate person in the authorities for a response.

Contact Details of the CLO:

Branch: KAZH Kyzylorda Regional Office
Name: Aliakbar Myrzabai
Title: Head of Quality Control and Acceptance Department
Telephone: + 7 701 174 86 05
Address: Kyzylorda Regional branch of KAZH, Kyzylorda, Zheltoksan str 18
Email: aliakbar.myrzabay@qaj.kz
Website: <https://ru.qaj.kz>

Figure 8 Public Grievance Form

GRIEVANCE REGISTRATION FORM	
CONTACT INFORMATION	
Name:	Gender: <input type="checkbox"/> Male / <input type="checkbox"/> Female
Address:	
Community:	Telephone:
Rayon and Oblast:	E-mail:
Anonymous grievance: <input type="checkbox"/> Yes / <input type="checkbox"/> No	Preferred mode of communication for feedback: <input type="checkbox"/> Mail / <input type="checkbox"/> Phone / <input type="checkbox"/> E-mail
DESCRIPTION OF GRIEVANCE / SUGGESTION / QUESTION	
Please provide details (who, what, where, when) of your grievance below:	
In case any other actions were undertaken by the complainant with respect to the grievance case, please provide details on past actions (if any):	
Please provide details on your suggested resolution for grievance:	
GRIEVANCE REGISTRATION DETAILS	
Name of registrant:	
Organization:	Position:
How the grievance was lodged: <input type="checkbox"/> in person / <input type="checkbox"/> mail / <input type="checkbox"/> e-mail / <input type="checkbox"/> phone / <input type="checkbox"/> fax / <input type="checkbox"/> _____	Type of grievance: <input type="checkbox"/> type A / <input type="checkbox"/> type B / <input type="checkbox"/> type C
Documents attached:	Grievance is relevant to project: <input type="checkbox"/> Yes / <input type="checkbox"/> No if "No" it was forwarded to: _____
Remarks:	
Signature of registrant:	Date of grievance:

Appendix 1 – Grievance Log

The following template will assist in recording comments, complaints and grievances for monitoring purposes.

Name/Contact details	Date received	Details of complaint/comment	Responsibility	Actions taken	Date resolved