Project: Category A Road Project, Kazakhstan – Kurty Buribaytal 62 km Road Project

Date: May 2015

Version: Final Version

Appendix D: Environmental and Social Action Plan (ESAP)

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	**Assessment and Management of Environmental and Social Impacts and Issues**						
1.1	Incorporate this ESAP so that the Project is structured to comply with the Bank's Performance Requirements. Prepare annual monitoring reports on the status of ESAP implementation. Include in the report stakeholder engagement activities and resolution of grievances	Compliance with EBRD performance standards	EBRD PR1 to PR10 excluding PR7 & PR9	Own resources and Project Implementation Unit (PIU)	Annual submission	Report on ESAP implementation status and stakeholder engagement activities and resolution of grievances against a regularly updated grievance log	

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1.2	Clearly identify team structures, organisations roles and responsibilities (JSC Kazautozhol) Confirm PIU and specialists responsible for the management of environmental and social issues Inform on appointments of contractors, project management consultants (PMC), construction supervision consultants (CSC) and any other key appointments	Compliance with EBRD performance standards	EBRD PR1	Own resources and PIU	PIU on appointment, others as part of annual submissions	Provision of management structure, roles and responsibilities (including contracting companies) Names of companies appointed	
1.3	Assess the capacity of implementing units, contractors, organisations, PMCs, CSCs and other key appointments Develop workforce capacity building programmes for successful project implementation	Compliance with EBRD Performance standards	EBRD PR1	Own resources, PIU and external consultants	On appointment and continue as part of the annual review	Report on assessment of capacity Training requirements identified and implemented	
1.4	Develop and implement Environmental Management Plan for PIU taking into account the best international practice aligned to ISO 14001	Optimisation of environmental management though a formalised system	EBRD PR1 Voluntary and best practice	PIU EMS and own resources and /or external consultants (cost dependent on extent of support)	End of 2017	Develop and implement an EMS Annual EHS Report to the Bank	
1.5	Review labour and social policies and incorporate into contractual arrangements with contractors – to include terms of employment, skills, dismissal, discrimination, harassment, violations, human rights, forced and child labour, wages and social leave/benefits and bribery and corruption	Contractor management	EBRD PR1, PR4	Provided by contractors and verified by the PIU	Prior to construction activities	Contractor employment and social policies Consolidated report including pp.2.1 and 4.2	

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1.6	Permits are in place, with the exception of permits required to cover air emissions. However, as per Kazakhstan laws these can be obtained within a year after the commencement of construction works If there are any design changes, obtain the necessary permits again prior to commencements of activities for which the permits are required. These include permits of temporary and permanent land use – construction pads, spoil dumps, contractor camps, batching plant and also environmental permits to cover air emissions, water use etc. that have not yet been obtained	Compliance with the Republic of Kazakhstan regulatory requirements	EBRD PR1, PR4	Internal resource with support of PIU and /or resourced externally (for technical support in application processes)	Prior to construction activities commencing	Correspondence with regulatory bodies, copies of permits and certificate	
1.7	Conduct monthly inspection of contractors' occupational health and safety (OHS) performance. Contractor's report on performance to EBRD every six months during construction	Ensure contractor adoption of EBRD requirements for OHS	EBRD PR1	Own resources and /or external consultants	During construction	Report submitted to the Bank as part of annual report	
1.8	Set up and maintain an Environmental, Health and Safety (EHS) incident reporting procedure to maintain records of annual monitoring, accidents and incidents. The procedure must be overarching, unique and integrated for the Project and for the contractors located on site	Set up an EHS incident reporting procedure	EBRD PR1	Own resources and contractors	Prior to construction	Monthly EHS reports on the project made by the contractor. Reports to the Bank within annual report	
1.9	Client, contractors, PMCs, CSCs to provide sufficient staffing to manage the environmental, health and safety and social performance of the Project	Ensure appropriate Organisation Capacity and Competency	EBRD PR1	Own resources, PMCs, CSCs and contractors	Prior to start of construction and during the mobilisation	Appointment letter of EHS management. Outline of all key staff roles and adequate staffing levels	

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PR2	**Labour and Working Conditions**						
2.1	Develop and adopt a Human Resource (HR) Policy and management system covering all employees, contractors and sub-contractors, to include (but not be limited to): • Approach to managing its workforce • Management of worker relationships • Access to worker's organisations • Working conditions and terms of employment • Child labour and forced labour policies • Equal opportunities and non-discrimination • Oversight provided of contractor policies/procedures • Access by all workers to policy/procedures in their language(s)	To ensure management of workforce in line with EBRD requirements.	EBRD PR2 Labour Code of the Republic of Kazakhstan	Own resources and PIU	HR policy developed and adopted: prior to further construction activities Contractor policies/ procedures reviewed/ approved: prior to work on-site HR Policies implemented throughout construction and operation	Consolidated report with pp.1.5 and 4.2 Technical specifications to the contract documentation Written HR policies compliant with EBRD PR2 and the national Labour Code	
2.2	Consider the possibility to employ the local population taking into account gender policy (local skilled labour is potentially available in Aksuek Town and Burybaytal station)	Provision of equal opportunities and improving economic prospects of local residents	EBRD PR2	Own resources	Prior to and during construction	Report on employing local residents taking into account gender policy within the annual monitoring report	

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2.3	Document the constructors' labour accommodation strategy and principles. Develop a code of conduct adopted to govern life in the workers camp specific to the Project and the site Identify a suitable location of accommodation with consideration for utilising existing capacity in accommodation and other local amenities e.g. Aksuek Town The existing accommodation or new camp is to be arranged / designed to ensure it meets EBRD / IFC standards. Develop a camp specific code of conduct	To standardise accommodation provided to the workers employed by the contractors To minimise the impact of any in-migration of construction workers on local communities	EBRD PR2	Own resources, PIU and construction companies	Prior to construction of labour accommodation, or camp being accommodated by workers. To be incorporated into tender documents	Technical statement to the contract documentation Code of conduct for camp residents	
2.4	Consideration of the applications from the local residents in their language (s) in accordance with the legislation of the Republic of Kazakhstan. Set up and maintain a formal grievance mechanism for employees and contractors and disseminate information about its uses to the workforce in the language(s) of the workers	To provide a channel for raising workers' concerns and a transparent, consistent mechanism for resolution	EBRD PR2	Own resources	Prior to construction and at regular intervals throughout construction, Report to EBRD on grievances and resolutions proposed	Adoption of formal grievance mechanism detailed in the Stakeholder Engagement Plan(SEP) and human resources policies	
2.5	Arrangement of inspections involving independent consultants and other state and non-government organizations in order to audit the compliance of contractors with the Labour Code of the Republic of Kazakhstan and international standards	To prevent non-compliance with the requirements of the employment policy of EBRD and Labour Code of Republic of Kazakhstan	EBRD PR2	Own resources and PIU	Audit arrangement within 3 months after the project mobilization	Within the annual monitoring report	

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2.6	Develop human resources policies and management plans covering non-employee and third party workers to manage supply chain	To minimise supply chain risks	EBRD PR 2	Own resources and PIU	Prior to engaging any third party workers	Human resources and management policy for supply chain and third party workers	
2.7	Undertake the tender process for the construction works to identify contractors with inclusion of environmental, health and safety performance, accidents statics, management systems and policies	Contractor management	EBRD PR1, PR2, PR 4	Own resources with support of PIU	During contractor selection process	Tender documentation	
PR3	**Resource Efficiency and Pollution Prevention and Control**						
3.1	Implementation of recommendations provided by consultants in EIA and in the report: • To amend EIA and provide the requested supplementary information.	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	Prior to and during the construction	Progress report within the annual monitoring report	

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3.2	Undertake baseline air quality monitoring for NO_2 at locations along the alignment for a minimum of 3 months (and preferable 6 months) prior to the start of construction. Undertake visual dust monitoring daily during construction, and dust dampening measures taken if required. Establish a complaints hotline for the duration of the works and the number should be displayed at appropriate locations near the road. Locations should be at potentially affected settlements – e.g. Burybaytal Station and 4 resting areas (2 existing and 2 new areas, where businesses will continue to operate and new businesses will operate in the future respectively)	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	After defining the contractor in accordance with the work schedule	Progress report within the annual monitoring report	

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3.3	Undertake day-time, evening and night-time noise surveys along the alignment to establish the noise baseline. This information should then be used to identify any locations with existing elevated noise levels, and to consider the implications of any increases on these locations Predict construction noise and vibration at specified locations Locations should be at potentially affected settlements – e.g. Burybaytal Railway Station and 4 resting areas (2 existing and 2 new areas, where businesses will continue to operate and new businesses will operate in the future respectively) Perform regular monitoring of noise and vibration during construction at work sites and at specified locations. Identify activities that generate large noise volumes, such as crushers and pilling, and located them away from noise receptors. Measure their noise effects to ensure noise limits are not exceeded	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	After defining the contractor in accordance with the work schedule	Progress report within the annual monitoring report	

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3.4	Technical water will be transported by road tanker from Lake Balkhash on an existing road that will be rehabilitated. A permit is in place for water abstraction from the lake. Drinking water will be sourced from an existing well and pipeline to provide water for the workers camp Undertake an assessment of water impacts to include the sources, groundwater recharge rates Identify how wastewater will be managed (not currently specified). This needs to be managed to avoid polluting Lake Balkhash, groundwater, the four rivers which the road crosses and the Nature Reserve within which the scheme is located. Ensure that the contractor sends wastewater to a two stage sewage treatment works Specify measures that will be used such as interceptors for surface water capture and treatment (at 18 construction pads, with a total area of 9 hectares. 5 will be next to bridges, although riverbed is mostly dry	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	After defining the contractor in accordance with M&A During and after construction	Progress report within the annual monitoring report	

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3.5	Supervise potentially contaminated soils along the alignment The potential for the soil works to impact on groundwater near the bridges needs to be assessed further Implement monitoring during the construction phase	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	During construction	Progress report within the annual monitoring report	
3.6	Consideration should be given to geohazards and if none are anticipated this should be confirmed	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	During geological works	Progress report within the annual monitoring report	
3.7	Provide secondary containment measures for hazardous materials and stored in construction compounds. Use fluid catchment trays in vehicle refuelling areas	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	After defining the contractor in accordance with M&A During construction	Progress report within the annual monitoring report	
3.8	Identify licensed facilities for disposal of construction waste and other waste streams including hazardous waste (not currently identified)	Environmental impacts	EU EIA	Own resources, PIU, CSC and contractors	During construction	Progress report within the annual monitoring report	
PR4	**Health and Safety**						
4.1	Provide a summary of how isolated properties (e.g. the farmhouse) and other sites will have access (e.g. to Lake Balkhash) as there are currently dirt roads joining the road. Ensure they will continue to be able to join the reconstructed road (during construction and when the road is complete and in full use)	Avoidance of local population severance	PR4	Own resource (with design company), PIU, CSC and/or contractors	After defining the contractor in accordance with M&A	Report on findings, with changes to road design as needed	

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4.2	Develop an integrated Occupational Health and Safety Plan that is compliant with national legislation, monitoring and management systems to cover any operation of the Project. The system should cover: • Job- and task-specific hazard analysis and controls • PPE requirements and enforcement mechanisms • Designation and enforcement of smoking/non-smoking areas • Safety training for all personnel in their own language(s) • Review of contractors OHS plans, to meet the same standards as Project Company plans • Oversight of contractor OHS development / implementation, including mandatory reporting to CSC • Record-keeping, including total work-hours, lost work-hours due to accidents/incidents, description of lost-time incidents, hospitalisations, fatalities • Toolbox talks to share information on risks, accident prevention, etc. The same integrated document must be applied to all parties involved in the construction and operation of the Project	To minimise accidents and incidents and ensure safety of workers and equipment	EBRD PR 4 SNiP 3.06.04-91 SanPiN No3 01.016.97	Own resources, PIU, CSC and contractors	Prior to construction	Consolidated report with pp. 1.5 and 2.1 OHS Plan adopted by contractors Report to EBRD on status of plan development and on OHS performance, including work-hours, lost-time incidents, major accidents, fatalities (including actions taken in response to accidents) – include contractor data separately and combined	

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4.3	Prepare a site-specific Emergency Preparedness and Response Plan in consultation with contractors, sub-contractors, local emergency service providers and control authorities (if required in case of specific types of work)	Prepare for emergencies to minimise negative impacts	EBRD PR4 National legislation	Own resources, PIU, CSCs, Contractors and/or external experts from government agencies (if required)	Prior to construction	Documentation of the Emergency Preparedness and Response Plan	
4.4	Independently audit traffic and road safety measures introduced specifically for the site	Ensure an independent review of traffic and road safety measures	EBRD PR4	Own resources, PIU, CSCs, Contractors and/or external experts from government agencies (if required)	Annually during construction	Report on independent traffic and road safety audit	
4.5	Conduct due diligence investigation for all security personnel of the contractor to make sure they have appropriate licensing, experience and training	Prevent conflict between security personnel and local communities Prevent potential human rights violations by security personnel	EBRD PR4 Best practice	Own resources, PIU, CSCs and Contractors	Prior to construction work	Due diligence carried out and documented Report to EBRD any incidents involving security guards	

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4.6	Implementation of safe practices during construction to minimise potential impacts to local communities, and construction workers, during construction are to include: • Construction vehicles to keep to agreed access routes and adhere to speed limits • Information boards about public safety hazards and emergency contact information • Hazardous materials and wastes stored on site to prevent community exposure to these substances • Publishing of temporary livestock crossing sites and road works that disrupt traffic • Establish temporary diversions for the local access routes. These measures should be part of Construction Environmental Management Plans – which should include traffic management plans)	To minimise accidents and incidents with road users, local communities and livestock	EBRD PR4	Own resources, PIU, CSCs and Contractors	Prior to and during construction	Within annual monitoring report	
4.7	Review locations and safety measures for new bus stops on road where pedestrians will need to cross road Seek to minimise at grade crossing of highway by pedestrians, livestock and agricultural equipment (Refer to Road Safety Audit)	To minimise accidents and incidents with road users and maintain access for local communities	EBRD PR4	Own resource (with design company), PIU, CSC and/or contractors	In final design and before tenders for construction issued	Report on findings, with changes to road design as needed	

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4.8	In addition to cattle underpass for Aksuek Town, provide an underpass for agricultural and other vehicles. This has been requested in public consultation meetings as the town residents often cross over the road (Refer to Road Safety Audit)	To minimise accidents and incidents with road users and maintain access for local communities	EBRD PR4	Own resource (with design company), PIU, CSC and/or contractors	In final design and before tenders for construction issued	Report on findings, with changes to road design as needed	
PR5	**Land Acquisition, Involuntary Resettlement and Economic Displacement**						
5.1	Implement the SEP (See Action 10.1 to develop an SEP) and a formal grievance mechanism, and continued consultation with people affected by land acquisition and / or livelihood impacts (temporary or permanent)	Avoid misunderstandings and provide up-to-date information on land acquisition activities	EBRD PR5, PR10	Own resources, local authorities, PIU with a key role for the CLO and/or Social Affairs Officer	Prior to and during land acquisition	Document stakeholder engagement activities to include land acquisition Annual report on stakeholder engagement	
5.2	Identify formal and informal land owners and users, any formal and informal businesses who will be affected by land acquisition and develop a Land Acquisition and Compensation Framework to set out the principles of land acquisition and determine compensation measures in line with EBRD's policy. The Compensation Framework is to identify any losses related to the project including land, livelihoods and business losses regardless of formal title	Mitigation for the risks of land acquisition and compensating for lost income and land	EBRD PR5	Own resources, local and district level authorities, PIU with a key role for the CLO and/or Social Affairs Officer	Prior to land acquisition	Livelihood Restoration Framework (LRF) identifying all affected people and compensation frameworks The report shall be provided within the annual monitoring report	

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5.3	Land acquired for temporary structures for the duration of the construction will be re-cultivated and returned to the original owner. The re-cultivation will include the removal of any waste, structures, equipment and materials. According to H&S regulations, any hazardous chemicals, waste or other substances will be safely removed from the area to mitigate impacts on the community	To minimise long-term impacts of land acquisition	EBRD PR5	Own resources, PIU, CSCs, Contractors	After construction	Land cleared, re-cultivated and returned to original owner	
5.4	Independently audit land acquisition and compensation activities to ensure compliance with EBRD PR5. The audit will assess all aspects of land acquisition and will undertake a gap analysis to identify any gaps or missed actions during the land acquisition process	Ensure compliance with EBRD requirements	EBRD PR5	PIU and CSCs	After completion of land acquisition	Within the annual monitoring report	
PR6	**Biodiversity and Living Natural Resources**						
6.1	Undertake pre-construction surveys using a trained ecologist to check for the presence of protected species. Fence off as appropriate based on findings Do not undertake vegetation clearing during bird breeding season Identify ecologically sensitive areas and fence off as appropriate Hold toolbox talks for construction workers, on identifying key protected species that may discover. And what to do in the event of discovering one	Avoidance of wildlife severance	EBRD PR6	Own resources, PIU, CSC, Contractors and / or resourced externally (for ecological expertise, as required)	Prior to construction During construction	Within the annual monitoring report	

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PR7	**Indigenous People**						
Not applicable as there are no indigenous people affected by this project							
PR8	**Cultural Heritage**						
8.1	Introduce mitigation measures to preserve sites of cultural significance and archaeological sites in the area to include at least a 50 meter buffer fencing of sites and ensuring that construction activities will not prevent access to sites or will damage the sites	Preserve sites of cultural significance	EBRD PR8 Law of the Republic of Kazakhstan 02.07.1992 no. 1488-XII (amended 21.07.2007) 'On protection and use of historical and cultural heritage' Government of Kazakhstan Resolution 28.10.2011 no. 0218 'On approval of the definition of protected zones, regulation of development zones and zones of protected landscape of historical and cultural	Own resources, local authorities, PIU, CSCs and contractors	Prior to and during construction	Document plans and actions to preserve cultural heritage sites or provide the report of the authority Consolidated with p.8.2 Within the annual monitoring report	

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8.2	Introduce mitigation measures to preserve memorial sites along the road and if necessary identify the appropriate relocation processes with the informed consent of the owner of the memorial site (relatives)	Respecting traditions and customs	EBRD PR8	Own resources, local and district authorities	Prior to and during construction	Document plans and actions to preserve cultural heritage sites or provide the report of the authority. Consolidated with p.8.1 Within the annual monitoring report	
8.3	Set up a Chance finds procedures and report 'Chance finds' to the authorities and other relevant institutions to undertake excavation and full archaeological assessment of the finds	To preserve cultural heritage	EBRD PR8 National legislation	Own resources, PIU, CSCs and Contractors	During construction	Chance finds procedure Report on any archaeological findings and excavation	
PR10	**Information Disclosure and Stakeholder Engagement**						
10.1	Introduce and implement a Stakeholder Engagement Plan, including a Grievance Mechanism (SEP)	EBRD performance requirements	EBRD PR10	WSP | PB has developed an SEP for use by the PIU	After agreement with ARC (Automobile Road Committee) but before construction	Disclosure of SEP	
10.2	To disclose a Non-Technical Summary (NTS) providing a project description, the EIA process, the environmental and social benefits/impacts, mitigation and management measures and the contact details for communications with a link to the SEP	EBRD performance requirements	EBRD PR10	WSP | PB has developed an NTS for public disclosure	After agreement with ARC but before construction	Disclosure of NTS in the public domain	

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10.3	Implement the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the project life cycle. Documentation of all stakeholder activities and logging of grievances to inform the annual monitoring report. The SEP should be reviewed and if necessary updated annual or when changes occur in the Project Or to apply the grievance mechanism document developed by ABD for road sector and IFIs	Information dissemination and continuous engagement with affected stakeholders	EBRD PR10	PIU, authorities engaged in accordance with Grievance Committee	Prior to and during construction	Annual report on stakeholder engagement within the monitoring report	
10.4	Appoint a Community Liaison Officer (CLO) with appropriate skills and experience to effectively manage the implementation of the SEP	Liaison with local communities and authorities on a regular basis, analyse interaction and provide updates and practical recommendations	EBRD PR 1 EBRD PR 10	PIU and CSC	Prior to construction	Appointment of CLO	
10.5	Disclosure of documents that include the EIA, EIA supplements, SEP, NTS and the ESAP in accordance with requirements for EBRD Category A projects	EBRD performance requirements	EBRD PR10	PIU with a key role for the CLO	See SEP for full details of information to be disclosed and the timeframes	Disclosure of key documents in the public domain Document grievances and response to grievances with records maintained	