STAKEHOLDER ENGAGEMENT PLAN

Burybaytal-Aksuek 2152-2214km, Part of the Reconstruction of the ‘Centre-South’ Corridor Linking Astana to Almaty

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Contact Details

Responsibility for Stakeholder Engagement Activities:

Name: Ayzhan Tuganova (Айжан Туганова)
Title: Deputy Director of the Zhambul Regional Branch of the National Company KazAvtoZhol PLC (заместитель директора ЖОФ АО НК «КазАвтоЖол»)
Telephone: +7 7262-316-006
Address: 1 Tauke khana Street, Taraz 080000 (г. Тараз 080000 ул. ул. Тауке хана 1)
Email: atuganova@inbox.ru
Website: www.kazautozhol.kz
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1. Introduction

1.1. Background
This document is a Stakeholder Engagement Plan (SEP) prepared for JSC Kazautozhol (the Client), within the Ministry of Investment and Development of the Republic of Kazakhstan identifying relevant stakeholders, defining communication channels and plans regarding the reconstruction of the Burybaytal-Aksuek 2152-2214 km part of the Centre-South Corridor that links Astana to Almaty.

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 living 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 SEP contains a stakeholder identification table where all relevant stakeholders are identified with the most appropriate communication channels and strategies, information disclosure requirements and grievance processes that will be adopted. If there are stakeholders who are not included in the SEP they can get in contact with the Client to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

1.3. Scope of Plan
This document covers the following:

- Section 2 – Project descriptions, location of the roads and key environmental and social issues
- Section 3 – Public consultations and information disclosure requirements
- Section 4 – Identification of stakeholders and other affected groups
- Section 5 – Overview of previous stakeholder engagement activities
- Section 6 – Stakeholder engagement programme and methods of engagement and resources
- Section 7 – Grievance mechanism
2. Project Description

2.1. Overview of the Project
The EBRD is considering providing finance for the reconstruction of a section of the 228 km “Kurty Burybaytal” or the “Centre - South” corridor linking Astana to Almaty. The Section for which the EBRD finance is sought is 62 km (the “Project”), the Burybaytal-Aksuek section.

The proposed investments include the reconstruction and widening of the existing road, the reconstruction of bridges and upgrading of intersections as well as financing of supervising engineers, implementation assistance to the Project Implementation Unit (PIU) and institutional components.

The 62 km section (Section 1) that EBRD is potentially financing starts at the point of 281 km from Almaty, at approximately 2 km west of Aksuek. The road sections are:

- Section 1: km 2152-2214 (62km). Current section that is proposed for EBRD financing.
- Section 2: km 2214-2295 (81km). Previous section that has received EBRD financing.
- Section 3: km 2295-2335 (40km)
- Section 4: km 2335-2380 (45km)

As well as the EBRD, the other road sections will potentially be or have been financed by other International Financial Institutions (IFIs) that include World Bank (WB), Asian Development Bank (ADB) and Islamic Development Bank (IsDB).

2.2. Reconstruction Planned and Road Setting
The proposed EBRD funded road section is located in Moiynkum district of Zhambyl Oblast, between Burybaytal station and the Aksuek town. It is part of the transit “Centre-South” corridor of “Astana-Karaganda-Balkhash-Kapshagay-Almaty. The entire road section is aligned in south-eastern direction. It is the last part of Astana-Almaty highway to be rebuilt.

Currently, the road has two lanes and is Category 2 under Kazakh road standards. The road will be reconstructed to comply with the Kazakh Category 1b highway requirements and will include the reconstruction of bridges and upgrading of intersections.

The designed road alignment crosses four river beds Kuyaly, Karaul-Kashkan, Karasay, Botaborym. In recent years the river are mostly always dry. There will be the reconstruction of 4 bridges. Other upgrade or new features will also include a junction, off ramps, rest areas, bus stops, junction overpass, railway overpass, culverts, bridge and junction lighting and a police station.

The 62 km section of the road is located in the 50,400 km² Moiynkum district which is further subdivided into 16 rural areas inhabited by some 30,000 people of more than 30 nationalities. Aksuek is located 2 km north of the southern end of the road. The population of Aksuek was reduced by 10,000 people after a uranium mine was shutdown in 1991 and the empty houses in the town have been dismantled for reuse as building materials. The population now consists of approximately 1,200 residents, mainly elderly residents who once worked at the mine. Burybaytal station at the northern start of the road section consists of some 60 houses, over time its population has gradually fallen and there are now approximately 200 residents.

Apart from a family farm 3 km southeast of Burybaytal and 166 m north of the road, there are no houses or settlements located directly adjacent to the road section. The farm uses
the 200 m dirt road to enter the main road to travel in both directions. There are no houses and farms around the road due to the absence of fresh groundwater and poor pastures with grass that burns out before summer. Agriculture and small scale meat and dairy cattle farming is developed on Syrdarya River flood plain 100 km southwest of the road. Fresh water is brought to Burybaytal station by the railway and to Aksuek by a 53 km pipeline. There is limited livestock is held in these settlements. In order to cross the road, two new cattle underpasses are to be built: one immediately next to Burybaytal and the second next to the bridge through Karaul-Kashkan River that may flood the surrounding ground under the bridge once in 4-6 years and prevent the cattle from crossing for few weeks. Aksuek livestock can use two bridges and the railway overpass to cross the road.

There are various businesses such as petrol stations and cafes adjacent to the road alignment. These businesses do not need to be demolished as there is sufficient land adjacent to the alignment, for the reconstruction of the road. There will be a requirement for land acquisition for the road reconstruction, as two sections of the 62 km road will be realigned. These two sections are at the northern and southern ends of the road. The land that will be required for the land acquisition is not currently in use, and was observed to not have any informal agricultural or other commercial activities.

A certified archaeological company has undertaken a study to identify all sites and objects that are of cultural significance in the vicinity of the road. This study identified 11 fatal road accident memorials, a modern closed Muslim/Christian cemetery and 3 ancient burial mounds of unknown age.

The road corridor runs on gently hilly terrain, in the middle desert zone along the dry river beds and lakes, which is used for non-intensive herding. At present, on some days the small herds from the settlements and the farm may cross the road wherever convenient in the early morning and before dusk. The herders currently take their livestock across the road at all locations. However, because the river beds are used for pasturing, often the crossing occurs under the bridges. There is a water well near the road which is located at the farm. Its output limits the number of livestock the farm can keep. The alignment passes through the territory of Lake Alakol, and Lake Bakhash is also nearby. There are a number of dirt road connections to the lake, used for fishing, tourism and leisure activities. The road runs through the Zhusandaly Nature Preserve which is inhabited by a number of mammals including goitered gazelle, wolves, jackals, foxes, corsac foxes, hares and various birds. Two other nature protection areas near the road alignment are the Ramsar designated Ili River Delta 23 km northeast and Andasay Nature Preserve 91 km southwest.

Figure 1 shows the Burybaytal-Aksuek section of the road including road features that include location of bridges and overpasses, cattle underpasses, drainage pipes, exit roads, and rest areas.
Figure 1 Kurty-Buribaytal Road: Burybaytal-Aksuek Section
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 that 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 2-4:

- All interested people and public associations are allowed to express their opinions during the State environmental expertise
- Public hearing should be conducted for all projects which may directly influence the environment and public health
- A procedure of public hearings shall be established by the appropriate authority in the area of environmental protection and stipulate for:
  - Stakeholder identification
  - Designation of locations where information and consultations can be obtained
  - Indication of the manner of informing the public (placing posters in special locations, publication in newspapers, arrangements of exhibitions representing plans, drawings, tables, charts and models)
  - Determination of the way of public consultations (written presentation, public opinion polls)
  - Timing of public hearings

After making a decision at the conclusion of State environmental review, all stakeholders are allowed to receive information on the subject of the review.

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
- Ensure access of the interested public to EIA material

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, state authorities
■ 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.

3.2. EBRD Requirements

EBRD is committed to promoting environmentally sound and sustainable development in accordance with its Environmental and Social Policy (May 2014) and the Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement. EBRD sets out their stakeholder engagement requirements in the following documents:

■ Environment and Social Policy (2014)
■ Public Information Policy (2008)
■ PR 10 Information Disclosure and Stakeholder Engagement (2014)

EBRD considers public consultation and stakeholder engagement an on-going, meaningful and inclusive process, to be started at the earliest stage of the environmental and social assessment process and to be continued throughout the entire life of the EBRD financed project.

As a Category A project, the Burybaytal-Aksuek road project could potentially result in significant adverse environmental and/or social impacts and thus the Client will engage affected stakeholders at every stage of the project and their feedback will be built into the relevant project documents. The EIA and other relevant project documents will be publicly disclosed for comments and regular updates will be provided for all relevant stakeholders at least once a year.

3.3. EU SEA Directive

The Strategic Environmental Assessment (SEA) Directive emphasises a systematic approach ensuring that environmental and social/socio-economic impacts resulting from the adoption and implementation of plans and programmes are assessed, mitigated, communicated to decision-makers and that opportunities for the public to provide feedback and comments are ensured. An assessment using this integrated approach has two key components:

■ Preparation of environmental and social reports identifying, describing and evaluating the likely significant impacts discussing reasonable alternatives and mitigation measures
■ Organisation of stakeholder meetings and public consultations (with local authorities responsible for environmental, social, labour and/or land issues, other authorities, affected people, interested parties, relevant NGOs, academic institutions)

The public consultations and stakeholder engagement activities are required to be completed prior to the adoption of any action plans or programmes.
3.4. 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, sex, 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
- 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.

3.5. General Stakeholder Communication Records Maintenance

Consultation records, minutes of meetings and write-ups of informal consultations will be maintained by the local authorities/Community Liaison Officer (CLO) clearly logging the key information provided to stakeholders and also 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
This section will identify all relevant stakeholders including interested parties and other affected communities, local, district and regional level authorities. Stakeholders could also be individuals and organisations that may be directly or indirectly affected by the Project either in a positive or negative way, who wish to express their views.

In order to identify key stakeholders, the following definitions have been applied:

- **Stakeholders**: any person, group or organisation with a vested interest in the outcome of a body of work
- **Key stakeholders**: any stakeholder with significant influence on or significantly impacted by the project

There are other partnerships that are important for the implementation of the Project and addressing groups or individuals with a particular interest in the project who must be recognised by the Client to facilitate the project work is a requirement.

Stakeholders can be grouped into the following categories:

- International (e.g. investors, IFIs)
- Government (e.g. Republic of Kazakhstan, relevant Ministries, Moiynkum District and other relevant local authorities e.g. Aksuek Rural Area Council.)
- Advisory non-governmental organisations
- Services/suppliers (the design company and future Project Implementation Unit, KazAutoZhol in Zhambyl District and contractors that will be selected in tendering processes)
- Clients
- Education and training institutions (e.g. universities, colleges, think tanks)
- Industrial sector (e.g. construction and infrastructure trade bodies)
- Internal stakeholders (e.g. employees, employee representation, trade unions)
- General communities (e.g. affected settlements, local community groups)
- Public groups (e.g. hospitals, local schools, institutions of national heritage)
- The media

If stakeholders are not on the list above and would like to be kept informed about the Project, contact should be made with the CLO or other members of the local authorities.

4.2. Stakeholders Identified During the Development of this Plan
The project stakeholders identified at this stage are presented in Section 6.2 with an analysis of the best ways to engage with them according to the media that they are likely to use and be most comfortable with. The identification of relevant stakeholders are of crucial importance for the Project implementation process. The villages that will be directly affected by the Project will be Aksuek and Burybaytal station. In addition, business located at rest areas will also be affected.

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
The stakeholder identification examined if there are any groups of affected people who might be more vulnerable to potential Project impacts. Discussions have been held with relevant personnel from several institutions who are responsible for Project design and implementation to identify vulnerable groups.

During the assessments and the preparation of this SEP, groups were examined who might be affected by the projects differently due to their gender, age, ethnicity, religion, physical or mental disability or other attributes. The assessment identified that there are no vulnerable groups affected by the project who might require different channels of communication.

During Project implementation the CLO might identify vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified.

4.4. Gender Considerations
Gender considerations have been taken into account 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.
5. Local Authorities’ Stakeholder Relations and Approach

5.1. Overview of Existing Stakeholder and Community Relations

Stakeholder engagement and the organisation of public hearings is a requirement under Kazakh national legislation (please refer to Section 3.1 for more information). JSC Kazautozhol, the Client is working in close cooperation with relevant Ministries, municipal, district and local authorities. Stakeholder engagement is carried out at a grassroots level strengthening the relationship between communities and local authorities.

The national EIA was developed in accordance with the rules, regulations and standards of the Republic of Kazakhstan for the design and construction of roads. State Environmental Expertise Positive Conclusion on the EIA was obtained 20th March 2015, with the following prior approvals:

- The Sanitary Epidemiological Service – 30th January 2015; and

The EIA has been reviewed to identify gaps that have been as addressed with an Environmental and Social Action Plan (ESAP) developed with actions that are recommended for implementation in order to fully meet EBRD’s Performance Requirements, EU standards and international best practice.

During the EIA process, a public consultation meeting was held on 25th February 2015 in Burybaytal. The information on the forthcoming event was shared via an advertisement in local newspapers Znamya Truda (in Russian) and Akzhol (in Kazakh) both issued on 21st February 2015. The objectives of the public consultation were to explain the various elements of road construction such as road alignment, cattle underpasses, road surfacing etc. All attendees were given an opportunity to express their opinions and ask questions related to the Project.

There is currently no formal grievance or complaint mechanism set up, although, affected people can easily identify the relevant authorities and can directly contact them via telephone, mail or email to share their concerns and comments. Therefore, as part of this SEP a formal grievance mechanism is proposed with an appropriate form to record complaints, comments and questions about the project and an institutional framework with designated roles and responsibilities to manage the process, as provided in Figure 3.

JSC Kazautozhol should encourage local authorities to appoint a CLO who will be responsible for the implementation of the SEP and the grievance mechanism and who will act as a local focal point for affected people. More information about the CLO, its roles and responsibilities can be found in Section 7.4. KazAutoZhol based in Zhambyl District is the body that will for the Project Implementation Unit (PIU).

Key stages in the future will be the issue of invitations to tender for road construction companies and also the appointment of project management and project supervision roles.

All the permits and licences required by national legislation have been obtained, including land deeds, clearing permits, borrow pits / quarries permits for earthworks and soil gravel mix, pipe installation permits, lighting permits etc., with the exception of the permits required to cover air emissions which have not yet been obtained. However, as per the Republic of Kazakhstan laws these can be obtained within a year after the commencement of construction works.
5.2. **Summary of the Methods of Future Engagement Activities**

Future stakeholder engagement will build on the already existing system and structure of stakeholder activities with the active participation of relevant local authorities. The planned future activities will provide for a more systematic way of consultation and information disclosure, and data recording from relevant and interested stakeholders. Stakeholder engagement activities will record the following information on an on-going basis:

- Type of information disclosed, date and form of disclosure and distribution channels
- Minutes of meetings, lists of participants and locations of any meetings organised with affected people
- Individuals, groups, organisations and institutions that have been consulted
- Key issues and concerns discussed and raised by affected people
- Response mechanism, follow-up actions and investigations
- Documentation of activities and processes and response to stakeholders

During the construction stage, the Project Management Consultant (PMC) will include in internal monitoring reports meetings held with rural communities and village leaders and other organisations on providing information on the Project.

The information about stakeholder engagement activities will be updated on an on-going basis and all public consultation details related to the project will be included.
6. Stakeholder Engagement Programme

6.1. Disclosure of Information
The types of information 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 1 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 SEP is a live document that will be revisited and updated if necessary on an annual basis to reflect the changes in stakeholder engagement due to project developments and new stakeholders if any. The information that is required to be disclosed may change if there are changes in the Project design, schedule or area of influence. The external and internal communication methods and information for disclosure identified in Table 1 are not exclusive, the Client may choose to disclose more information upon request by stakeholders.

The local authorities will be responsible for internal and external communications regarding the project and they will appoint the CLO to be the main contact point for affected people. All related Project documents and communication related to the Project will be available and undertaken in Russian/Kazakh.

6.2. The Future Programme
The envisaged programme of public consultation and disclosure activities are presented 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:
Name: Ayzhan Tuganova (Айжан Туганова)
Title: Deputy Director of the Zhambul Regional Branch of the National Company KazAvtoZhol PLC (заместитель директора ЖОФ АО НК «КазАвтоЖол»)
Telephone: +7 7262-316-006
Address: 1 Tauke khana Street, Taraz 080000 (г. Тараз 080000 ул. ул. Тауке хана 1)
Email: atuganova@inbox.ru
Website: www.kazautozhol.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 within the 'Requirements' section provided in Section 3.4. 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 Future Stakeholder Engagement Programme is detailed Table 1 below.
<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Communication method</th>
<th>Information to be disclosed</th>
<th>Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>People affected by land acquisition or restricted access</td>
<td>Information boards with post box and personal visits to herders and farm houses</td>
<td>NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction</td>
<td>Prior to construction During project implementation weekly update on grievances and quarterly update on vacancies</td>
</tr>
<tr>
<td>Affected people, residents and employees of farms and villages, informal land users</td>
<td>Information boards with post box and personal visits in Aksuek</td>
<td>NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction</td>
<td>Prior to construction During project implementation weekly update on grievances and quarterly update on vacancies</td>
</tr>
<tr>
<td>Residents of other villages in the area</td>
<td>Information board, mass media, internet, documents on request in Aksuek library</td>
<td>NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction</td>
<td>Prior to construction and during project implementation Quarterly update on vacancies</td>
</tr>
<tr>
<td>Regional public</td>
<td>Newspapers, internet, Almaty job centre</td>
<td>NTS, grievance mechanism, vacancies</td>
<td>Quarterly update</td>
</tr>
<tr>
<td>Regional mass media</td>
<td>Telephone, e-mails</td>
<td>Detailed project information and NTS on request</td>
<td>Quarterly update</td>
</tr>
<tr>
<td>Local NGOs (Blago, Esaliyev)</td>
<td>Telephone, newspaper, documents and meetings on request</td>
<td>Detailed project information on NTS on request</td>
<td>Quarterly update</td>
</tr>
<tr>
<td>Village area and district councils</td>
<td>Meetings, telephone, e-mail, information boards in council buildings</td>
<td>EIA, EIA supplements, NTS, SEP, ESAP, vacancies</td>
<td>Quarterly update</td>
</tr>
<tr>
<td>Construction workers</td>
<td>Information boards and meetings in construction camp canteen</td>
<td>NTS, health and safety requirements, workers protection requirements, workers’ grievance mechanism</td>
<td>Prior to construction, monthly updates during construction</td>
</tr>
<tr>
<td>Suppliers of goods and services</td>
<td>Information boards with post box in Aksuek village and KazAutoZhol office in Zhambyl District, Taraz, office visits, internet</td>
<td>NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection requirements, grievance mechanism</td>
<td>Quarterly update</td>
</tr>
<tr>
<td>Sanitary Epidemiological Service (SES)</td>
<td>Hand delivery of documents to regional SES office for approval</td>
<td>EIA, workers’ camp design</td>
<td>Before EIA State Expertise</td>
</tr>
<tr>
<td>Emergency Situation Office</td>
<td>Formal e-mails, meetings and telephone calls with the regional department</td>
<td>EIA, Emergency Preparedness and Response Plan</td>
<td>Prior to construction and feedback after an emergency</td>
</tr>
<tr>
<td>Ministry of Agriculture District Department</td>
<td>Official correspondence</td>
<td>Approval of sufficiency of underpasses and off-ramps</td>
<td>Before detailed design is completed</td>
</tr>
<tr>
<td>Ministry of Agriculture</td>
<td>Correspondence, hand delivery of reports to the Astana Office and the regional department office</td>
<td>EIA, reports on emissions, use of resources and compliance with legislation and permits</td>
<td>Prior to construction Biannual submission</td>
</tr>
<tr>
<td>International NGOs and all above</td>
<td>No direct contact, documents available on EBRD and KazAutoZhol websites</td>
<td>NTS, EIA and supplements</td>
<td>120 days before EBRD Board discussion and for the loan duration</td>
</tr>
</tbody>
</table>
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. An open book will be available for stakeholders participating in public consultation meetings and will be available at the major’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
A grievance mechanism will be implemented to ensure that the Client is responsive to any concerns and complaints particularly from affected stakeholders and communities. Special care will be focused on the training of the designated staff involved in the management of the grievance mechanism. This grievance mechanism covers both employees and non-employees (i.e. affected people and other relevant stakeholders).

Any comments or concerns can be brought to the attention of the company verbally or in writing (by post or e-mail) or by filling in a grievance form (example included - Figure 3). The grievance form will be made available in the major’s office, schools, community centres and other public places that are easily accessible for all relevant stakeholders, alongside a description of the grievance mechanism. Grievance forms can then be submitted to the contact details provided in Section 6.2.

All grievances will be:

- Acknowledged within 14 working days
- Responded to no later than within 30 working days

Specifically nominated and trained members of staff will record grievance information in a grievance log. This will include:

- Stakeholder name and contact details
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out

The process is depicted in Figure 2.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means.

Appendix 1 provides a grievance log to record comments, complaints and grievances for monitoring purposes.
Figure 2 Grievance procedure

Grievance received (in verbal or written format) → Record the date in the Grievance Register

Immediate action enough to satisfy complaint

YES → Inform complainant of corrective action

NO → Identify any long-term corrective action required

Record the date in the Register

Inform complainant of the proposed corrective action or clarify why action is not required within 30 days

Implement the corrective action and carry out the follow-up of the corrective action

Record the date. Close the case.
7.3. Roles and Responsibilities
The local authorities and the CLO 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.

<table>
<thead>
<tr>
<th>Name of the Person and Title</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name: Ayzhan Tuganova (Айжан Туганова)</td>
<td>Title: Deputy Director of the Zhambul Regional Branch of the National Company KazAvtoZhol PLC (заместитель директора ЖОФ АО НК «КазАвтоЖол») Telephone: +7 7262-316-006 Address: 1 Tauke khana Street, Taraz 080000 (г. Тараз 080000 ул. ул. Тауке хана 1) Email: <a href="mailto:atuganova@inbox.ru">atuganova@inbox.ru</a> Website: <a href="http://www.kazautozhol.kz">www.kazautozhol.kz</a></td>
</tr>
</tbody>
</table>

7.4. Community Liaison Officer
JSC Kazautozhol will appoint or sub-contract a Community Liaison Officer (CLO) who will be responsible for community liaison and arranging communications with local communities. The CLO will be available throughout the Project and will be largely responsible for implementation of the SEP, particularly receiving and channelling comments and concerns during the construction phase as well as management of the grievance mechanism during the construction and some of the operational phase. The CLO will ideally be located in close vicinity of the Project and its affected stakeholders to ensure their accessibility.
<table>
<thead>
<tr>
<th><strong>Reference No:</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Full Name</strong></td>
</tr>
<tr>
<td>Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</td>
</tr>
<tr>
<td><strong>My first name</strong></td>
</tr>
<tr>
<td>____________________________</td>
</tr>
<tr>
<td><strong>My last name</strong></td>
</tr>
<tr>
<td>____________________________</td>
</tr>
<tr>
<td>☐ I wish to raise my grievance anonymously</td>
</tr>
<tr>
<td>☐ I request not to disclose my identity without my consent</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Contact Information</strong></th>
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</thead>
<tbody>
<tr>
<td>Please mark how you wish to be contacted (mail, telephone, e-mail).</td>
</tr>
<tr>
<td>☐ By Post: Please provide mailing address:</td>
</tr>
<tr>
<td>____________________________</td>
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<td>____________________________</td>
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<tr>
<td>☐ By Telephone: ____________________________</td>
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<tr>
<td>☐ By E-mail ____________________________</td>
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<table>
<thead>
<tr>
<th><strong>Preferred Language for communication</strong></th>
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<tbody>
<tr>
<td>☐ Russian</td>
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<td>☐ Kazakh</td>
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<table>
<thead>
<tr>
<th><strong>Description of Incident or Grievance:</strong></th>
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<tr>
<td>What happened? Where did it happen? Who did it happen to? What is the result of the problem?</td>
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<thead>
<tr>
<th><strong>Date of Incident/Grievance</strong></th>
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<tr>
<td>☐ One time incident/grievance (date __________)</td>
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<tr>
<td>☐ Happened more than once (how many times? ____)</td>
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<tr>
<td>☐ On-going (currently experiencing problem)</td>
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<tr>
<th><strong>What would you like to see happen to resolve the problem?</strong></th>
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</table>
Appendix 1 – Grievance log

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

<table>
<thead>
<tr>
<th>Name/Contact details</th>
<th>Date received</th>
<th>Details of complaint/comment</th>
<th>Responsibility</th>
<th>Actions taken</th>
<th>Date resolved</th>
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<tbody>
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