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European Bank for Reconstruction and Development

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Kapshagai-Kurty 67 km Road Project, Kazakhstan

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ENVIRONMENTAL AND SOCIAL ACTION PLAN

No.	Action	Environmental and Social Risks (Liability / Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs and Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation*	Status / Notes
PR1	Assessment and Management of Environmental and Social Impacts and Issues						
1.1	Prepare annual monitoring reports that include the status of ESAP implementation, EHS performance and stakeholder engagement activities and resolution of grievances.	Compliance with EBRD PRs.	<ul style="list-style-type: none"> EBRD PR1 to PR10 (excluding PR7 and PR9). 	Own resources and PIU.	Annual submission (pre-construction).	Submission of an Annual Environmental and Social Report (AESR) that reports on ESAP implementation progress, effective EHS performance, stakeholder engagement activities in line with the SEP and resolution of grievances.	It is reported in the AESRs of the previous roads schemes that a system is in the process of consideration and approval.
1.2	Develop and implement an Environmental and Social Management System (ESMS) for the PIU, aligned to the principles of ISO 14001:2015. Continually review and update, as a minimum annually and with Project and / or legislative changes.	Optimisation of environmental and social management through a formalised document and associated system.	<ul style="list-style-type: none"> EBRD PR1; and Best practice. 	Own resources and PIU and / or external consultants (expertise, as required).	Before the end of 2018.	Develop and implement an ESMS.	
1.3	Obtain the necessary outstanding permits prior to commencements of activities for which the permits are required. These include: <ul style="list-style-type: none"> A Construction Permit (following camp(s) plan submission); and An Order for Work (following blasting work plan submission); A Construction Camp(s) Permit(s) (following camp plan submission). If there are any design changes, obtain the necessary permits again prior to commencements of activities for which the permits are required.	Compliance with the Republic of Kazakhstan regulatory requirements.	<ul style="list-style-type: none"> EBRD PR1; and EBRD PR4. 	Own resources and PIU and / or external consultants (expertise, as required).	Prior to activities for which permits are required (pre-construction).	Correspondence with regulatory bodies and copies of all applicable permits and certificates.	Many of permits required have been obtained, although a number are outstanding.
1.4	Set-up, maintain and continually review an Environmental, Health and Safety (EHS) Incident Reporting Procedure (or equivalent) to maintain records of monitoring, accidents and incidents. The procedure must be overarching, unique and fully integrated into the Project and for contractors located on site.	Management of EHS accidents and incidents.	<ul style="list-style-type: none"> EBRD PR1, PR4; and Best practice. 	Own resources, PIU and contractors.	Set up prior to construction (pre-construction). Monitoring and review during construction (construction).	Monthly EHS Reports submitted by the contractor. Report to EBRD annually in the AESR.	
1.5	Conduct environmental and social analysis of construction camps, potential new quarries and depots (covering their location and status). The analysis of new quarries should also consider the potential cumulative effects of material requirements associated with the adjacent "Kurty-Buribaytal" Project, as per the Cumulative Effects Chapter of the Supplementary ESIA Report.	Management of E&S risks on selection of location and status of camps, quarries and depots.	<ul style="list-style-type: none"> EBRD PR1, PR2 and PR4. 	Own resources and PIU.	Prior to construction (pre-construction).	E&S reporting of key issues.	
1.6	Prepare a Construction Camp Management Plan, an Influx Management Plan (this Plan only required if a construction workforce from outside Kazakhstan is used), a Security Management Plan and an Employment Management Plan.	Compliance with EBRD PRs.	<ul style="list-style-type: none"> EBRD PR1; and EBRD PR4. 	Own resources, PIU and contractors.	Prior to construction (pre-construction).	Develop and implement a Construction Camp Management Plan, an Influx Management Plan (this Plan only required if a construction workforce from outside Kazakhstan is used), and a Security Management Plan.	
1.7	Conduct monthly inspection of contractors' occupational health and safety (OHS) performance.	Ensure contractor adoption of EBRD requirements for OHS.	<ul style="list-style-type: none"> EBRD PR1 and PR4 	Own resources and /or external consultants.	During construction (construction).	Report to EBRD annually in the AESR on contractor OHS performance.	

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PR2	Labour and Working Conditions						
2.1	Develop Human Resources (HR) policies and procedures to ensure that rights of employees are protected in accordance with the Kazakhstan Labour Code and PR2. HR document to cover all the issues associated with minimum wage, working hours, paid overtime, equality and non-discrimination, employees' grievances, working condition, access to resources, freedom of collective bargaining.	Employee awareness about their rights.	<ul style="list-style-type: none"> EBRD PR2; and Kazakhstan Labour Code. 	PIU.	Prior to construction activities (pre-construction).	HR manual which all employees have access to.	
2.2	Undertake the tender process for the construction works to identify contractors with inclusion of environmental, social, health and safety performance standards, accidents statistics, management systems and policies.	Contractor EHS management.	<ul style="list-style-type: none"> EBRD PR1; EBRD PR2; and EBRD PR4. 	PIU.	During contractor selection process (tender).	Tender and contract documentation. ESAP within tender documents.	
2.3	Document the constructors' labour accommodation strategy and principles within a Plan that also includes a code of conduct to be adopted to govern life in the workers camps. The new camp is to be arranged / designed to ensure it meets EBRD / IFC standards.	To standardise accommodation provided to workers employed by the contractors and to minimise impact of any in-migration of construction workers on local communities.	<ul style="list-style-type: none"> EBRD PR2; and Guidance Note by IFC / EBRD "Workers' Accommodation: Processes and Standards" 	PIU and construction companies.	Prior to construction of labour accommodation, or camp being accommodated by workers (pre-construction). To be incorporated into tender documents (tender).	Labour Accommodation Management Plan and Code of Conduct for camp residents. Technical statement to the contract documentation.	One or more workers camps may be required.
2.4	Implement arrangements to maximise the employment of the local population (as far as possible), taking into account the commitments within the Gender Policy). Develop and implement a Gender Policy for the Project.	Provision of equal opportunities and improving economic prospects of residents.	<ul style="list-style-type: none"> EBRD PR2. 	PIU and construction companies.	Prior to and during construction (pre-construction and construction).	Report on employing local residents taking into account gender policy. Report to EBRD annually in the AESR on employment data.	local skilled labour is potentially available in nearby towns and villages
2.5	Monitor labour performance and situation with regards to working hours, health, working condition, child and forced labour , and labour concerns and grievances	Reduced risk associated with labour dispute and grievances.	<ul style="list-style-type: none"> EBRD PR2 	PIU.	Throughout the Project (pre-construction, construction and operation).	Regular labour inspections and audit.	
2.6	Monitor suppliers and contractors and ensure clauses on working hours, minimum wage, minimum age, freedom of collective bargaining and equality and non-discrimination are included in procurement documents.	Reduced risks associated with child labour, forced labour and labour grievances.	<ul style="list-style-type: none"> EBRD PR 2. 	PIU and construction companies.	During the course of the Project (procurement). Regular monthly inspections and audits (procurement).	Implementation of Supply Chain Management Plan.	
2.7	Establish an employee grievance mechanism.	Reduced risk associated with labour disputes	<ul style="list-style-type: none"> EBRD PR 2 	PIU	During the course of the Project (pre-construction, construction and operation).	Employee grievance mechanism.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	Implement the mitigation measures stated in the Air Quality Chapter of the Supplementary ESIA Report.	Prevention of adverse air quality impacts.	<ul style="list-style-type: none"> EU EIA Directive; EBRD PR3; and Best practice. 	Own resources, PIU, CSC and external consultants (e.g. air quality experts as required).	Prior to and during construction (pre-construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	
3.2	Implement the mitigation measures stated in the Noise and Vibration Chapter of the Supplementary ESIA	Prevention of adverse impacts associated with noise and	<ul style="list-style-type: none"> EU EIA Directive; EBRD PR3; and 	Own resources, PIU, CSC and external consultants	Prior to and during construction (pre-	Review of the Project design.	

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	Report. Inclusive of considering the introduction of acoustic barriers, most likely through reprofiled earthworks to create an earth bund to screen the road from the nearest dwellings.	vibration.	<ul style="list-style-type: none"> Best practice. 	(e.g. acoustics experts as required).	construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	
3.3	Prepare an Emergency Preparedness and Response Plan (or equivalent) for each emergency situation and potential accidents in consultation with contractors, sub-contractors, local emergency service providers and control authorities (if required in case of specific types of work). Continually review and update, as a minimum annually and after any emergencies or accidents.	Preparation for emergency situations and potential accidents are managed.	<ul style="list-style-type: none"> EU EIA Directive; EBRD PR3; EBRD PR4; and Best practice. 	Own resources, PIU, CSC and / or external consultants (expertise, as required).	Prior to construction activities (pre-construction).	Emergency Preparedness and Response Plan. Plan to be incorporated into the CEMP developed (as included in the ESMP).	
3.4	Implement the mitigation measures stated in the Climate Change Chapter of the Supplementary ESIA Report. Estimate the GHG emissions during construction and operation.	Reduce and minimise GHG emissions.	<ul style="list-style-type: none"> EU EIA Directive; and EBRD PR3. 	Own resources, PIU, CSC and contractors and / or external consultants (expertise, as required).	Prior to and during construction (pre-construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP). Should the Project be estimated to produce more than 25,000 tonnes of CO ₂ (equivalent annually) the GHG emissions should be reported to EBRD.	
3.5	Implement the mitigation measures stated in the Water Environment Chapter of the Supplementary ESIA Report. Inclusive of considering the inclusion of treatment and attenuation systems within the Project drainage design. Prepare an outline water and wastewater balance, and include details of the approved water supply permits.	Prevention of over-burdening of non-potable and potable water supplies. Reduction of water use and wastewater generation. Pollution and discharge prevention.	<ul style="list-style-type: none"> EU EIA Directive; and EBRD PR4. 	Own resources, PIU, CSC and contractors and / or external consultants (expertise, as required).	Prior to construction activities (pre-construction).	Review of the Project design. Outline water balance demonstrates the adequacy and suitability of the proposed source(s) of water for portable and non-portable water. If the Project is estimated to have a high-water demand (greater than 5,000 m ³ / day), this should be reported to EBRD – further requirements as per PR4 will be needed e.g. water balance, continuous improvements, specific water use, benchmarking etc. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	Water Permits are reported to have been obtained and should be made available.
3.6	Implement the mitigation measures stated in the Materials Resources and Waste Chapter of the Supplementary ESIA Report. Inclusive of development a Design Site Waste Management Plan and a Materials Management Plan once a Bill of Quantities is available for the Project.	Promote waste management in accordance with the waste hierarchy and the proximity principal.	<ul style="list-style-type: none"> EU EIA Directive; EBRD PR3; and Best practice. 	Own resources, PIU, CSC and contractors and / or external consultants (expertise, as required).	Prior to and during construction (pre-construction and construction).	Design Site Waste Management Plan and a Materials Management Plan, based on the Bill of Quantities, that refines the measures to reduce the use of materials and production of waste. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	
3.7	Implement the mitigation measures stated in the Geology and Soils Chapter of the Supplementary ESIA Report. Inclusive of undertaking a ground investigation and risk assessment.	Increase awareness of contaminated soils and where practicable avoid un-necessary disturbance of contaminated soils.	<ul style="list-style-type: none"> EU EIA Directive; and Best practice. 	Own resources, PIU, and / or external consultants (expertise, as required).	Prior to construction activities (pre-construction).	Implementation of mitigation measures. Management and mitigation measures from ground investigation and risk assessment incorporated into the CEMP developed (as included in the ESMP).	
PR4	Health and Safety						

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4.1	<p>Appoint licensed company to undertake blasting that is responsible for safe and secure storage and usage of explosives.</p> <p>As part of the drilling and blasting plan, an analysis of the safety of residential buildings and structures in the affected area will be undertaken. At a house 400 southwest and café 300m south of Kurty junction from blasting area, undertake pre- and post-blasting structural surveys of these properties.</p> <p>In case there is a risk of negative impact, a plan of measures to reduce, or compensate or restore, on the basis of appropriate examinations and additional studies, should be proposed.</p>	To minimise accidents and incidents and ensure safety of workers and community.	<ul style="list-style-type: none"> EBRD PR4; and Best practice. 	PIU, CLO ad external consultants (e.g. explosives and structural surveys).	<p>Appointment prior to construction (procurement).</p> <p>Pre- and post-blasting structural surveys (pre-construction and construction).</p>	<p>Company license.</p> <p>Blasting Work Plan.</p> <p>Survey reports.</p>	
4.2	<p>Develop an integrated Occupational Health and Safety Plan compliant with national legislation with monitoring and management systems to cover:</p> <ul style="list-style-type: none"> 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; and Toolbox talks to share information on risks, accident prevention, etc. <p>The same integrated document must be applied to all parties involved in the construction and operation of the Project.</p>	To minimise accidents and incidents and ensure safety of workers and equipment.	<ul style="list-style-type: none"> EBRD PR4; and National H&S regulations. 	Own resources, PIU, CSC and contractors.	Prior to construction (pre-construction).	<p>OHS Plan.</p> <p>OHS Plan to be adopted by contractors.</p> <p>Report to EBRD annually in the AESR on Plan, OHS performance, including work-hours, lost-time incidents, major accidents, fatalities (including actions taken in response to accidents) – include contractor data separately and combined.</p>	
4.3	<p>Implementation of safe practices during construction, set out in a CEMP and Traffic Management Plan, to minimise potential impacts to local communities, and construction workers to include:</p> <ul style="list-style-type: none"> Construction vehicles to keep to agreed access routes and adhere to construction speed limits; Ensure the competency of vehicle operators and provide induction training; Minimise the need for vehicle reversing; Provide segregated routes and site entrances (i.e. with no vehicles) to be provided for pedestrians; Use fencing to exclude local people and wildlife from the construction areas; Information boards about public safety hazards and emergency contact information, schedules; Hazardous materials and wastes stored on site to prevent community exposure to these substances; 	To minimise accidents and incidents with road users, local communities and livestock.	<ul style="list-style-type: none"> EBRD PR4. 	Own resources, PIU, CSC and Contractors.	Prior to and during construction (pre-construction and construction).	<p>Community Health and Safety Plan.</p> <p>Plan to be incorporated into the CEMP developed.</p> <p>CEMP should include Traffic Management Plans.</p> <p>Report to EBRD annually in the AESR on community safety performance.</p>	

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	<ul style="list-style-type: none"> Publishing of temporary livestock crossing sites and road works that disrupt traffic (also included in SEP); and Establish temporary diversions for the local access routes. <p>Develop CEMP inclusive of Traffic Management Plans.</p>						
4.4	<p>Design road in accordance with Kazakhstan SNiP technical norms.</p> <p>Incorporate the findings of the Road Safety Audit into the Project design.</p>	To minimise accidents and incidents with road users and maintain access for local communities.	<ul style="list-style-type: none"> EBRD PR4; Kazakhstan SNiP technical norms; and EU Road & Traffic Safety Management Standards. 	Own resource, PIU, contractors, and / or external consultants (e.g. design company, road safety auditor).	Adjustments to final design and before tenders for construction issued (tender).	Report on findings captured within the Project design.	Although design is complete there may be opportunities for small changes that do not delay Project or increase costs substantially but enhance road safety significantly.
4.5	Conduct due diligence investigation for all security personnel of the contractors to make sure they have appropriate licensing, experience and training.	<p>Prevent conflict between security personnel and local communities.</p> <p>Prevent potential human rights violations by security personnel.</p>	<ul style="list-style-type: none"> EBRD PR4; and Best practice. 	Own resources, PIU, CSC and Contractors.	Prior to construction work (pre-construction).	<p>Due diligence carried out and documented.</p> <p>Report to EBRD annually in the AESR on any incidents involving security guards.</p>	
PR5	Land Acquisition, Involuntary Resettlement and Economic Displacement						
5.1	<p>Introduce mitigation measures to ensure that land acquired for temporary structures (material storage / construction pads) or activities during construction are returned to its original state / use and improved where possible</p> <p>Mitigation measures to include:</p> <ul style="list-style-type: none"> Removal of structures, equipment, materials and waste; Any necessary landscaping / re-grading; and Replanting and re-seeding. 	Minimise impacts of land acquisition.	<ul style="list-style-type: none"> EBRD PR5; and Best practice. 	Own resources, PIU, contractors and / or resourced external consultants (expertise, as required).	Prior to, during and at completion of construction (pre-construction and construction).	<p>Management and mitigation measures to be incorporated into the CEMP developed (as included in the LRF and ESMP).</p> <p>Evidence that land has been returned to its original state / use, and where practicable has been improved.</p>	
5.2	<p>Identify formal and informal land owners and users (Including vulnerable groups), any formal and informal businesses who will be affected by land acquisition.</p> <p>Develop and implement a Livelihood Restoration Plan (LRP) fully in line with the commitments and event sequences defined in the in the Livelihood Restoration Framework (LRF).</p>	Mitigation for the risks of land acquisition and compensating for lost income and land.	<ul style="list-style-type: none"> EBRD PR5. 	PIU with a key role for the CLO.	Prior to all temporary and permanent land acquisition and subsequent to agreement with the EBRD (pre-construction, construction).	LRP shall be implemented provided prior to construction, and updates shall be provided within the annual AESR.	
5.3	Ensure associated construction and design contractors (i.e. EPC) implement the LRP and follow PR5 in temporary land acquisition	Reduced risk associated with loss of local income in relation to temporary land acquisition	<ul style="list-style-type: none"> EBRD PR 5 	PI	Prior to undertaking land acquisition (pre-construction and construction)		
5.3	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.	<ul style="list-style-type: none"> EBRD PR5. 	Third-Party Consultant	After completion of land acquisition (construction and post construction).	Report shall be provided within annual AESR.	To be agreed with the EBRD
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						

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6.1	Implement the mitigation measures stated in the Biodiversity and Living Natural Resources Chapter of the Supplementary ESIA Report. Including pre-construction walkovers to identify any protected flora and fauna.	Conserve and protect habitats, biodiversity and living natural resources.	<ul style="list-style-type: none"> • EU EIA Directive; • EU Habitats Directive; • EU Birds Directive; • EBRD PR6; and • Best practice. 	Own resources, PIU, and contractors and / or external consultant (e.g. ecological expertise, as required).	Prior to and during construction (pre-construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	
PR7	Indigenous Peoples						
Not applicable to this Project as there are no indigenous peoples involved.							
PR8	Cultural Heritage						
8.1	Implement the mitigation measures stated in the Cultural Heritage Chapter of the Supplementary ESIA Report. Including the development of a Cultural Heritage Management Plan (CHMP) and a corresponding Cultural Heritage Management Implementation Plan (CHMIP).	Respecting the local community and the associated traditions and customs.	<ul style="list-style-type: none"> • EU EIA Directive; • EBRD PR8; and • Best Practice. 	Own resources, PIU, and contractors and / or external consultants (e.g. cultural and archaeological heritage expertise, as required).	Prior to and during construction (pre-construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP, CHMP and CHIMP developed (as included in the ESMP).	
8.2	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.	<ul style="list-style-type: none"> • EBRD PR8; and • National legislation. 	Own resources, PIU, CSC and Contractors.	During construction (construction).	Chance finds procedure. Report on any archaeological findings and excavation.	
8.3	Implement the mitigation measures stated in the Landscape and Visual Chapter of the Supplementary ESIA Report.	Avoid and minimise adverse visual impacts.	<ul style="list-style-type: none"> • EU EIA Directive; • EBRD PR8; and • Best Practice. 	Own resources, PIU, and contractors and / or external consultants (e.g. landscape and visual expertise, as required).	Prior to and during construction (pre-construction and construction).	Implementation of mitigation measures. Management and mitigation measures to be incorporated into the CEMP developed (as included in the ESMP).	
PR9	Financial Intermediaries						
Not applicable to this Project as there are no financial intermediaries involved.							
PR10	Information Disclosure and Stakeholder Engagement						
10.1	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.	<ul style="list-style-type: none"> • EBRD PR10. 	WSP has developed an NTS for public disclosure.	Disclose prior to construction (pre-construction).	Disclosure of NTS in the public domain.	
10.2	Implement the SEP and grievance mechanism to ensure a continuous and systematic stakeholder engagement programme throughout the Project life cycle. Ensure that vulnerable people are identified and consulted throughout the project. 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.	Information dissemination and continuous engagement with affected stakeholders.	<ul style="list-style-type: none"> • EBRD PR10. 	PIU, authorities engaged in accordance with Grievance Committee.	Prior to and during construction (pre-construction and construction).	Annual report on stakeholder engagement within the monitoring report.	
10.3	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	<ul style="list-style-type: none"> • EBRD PR 1; and • EBRD PR 10. 	PIU and CSC.	Prior to construction (pre-construction).	Appointment of CLO.	

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		recommendations.					
10.4	Consult with all affected land owners and users on both permanent and temporary land acquisition (including selection of location of camps, underpasses, and potential new quarries).	Reduced risk associated with local concerns	<ul style="list-style-type: none"> EBRD PR 1,PR5,PR10 	PIU and allocated CLO	Prior to construction (pre-construction, construction, post construction)	Regular consultation.	
10.5	Disclosure of documents that include the national EIA, Supplementary ESIA, SEP, NTS and the ESAP in accordance with requirements for EBRD Category A Projects.	EBRD performance requirements.	<ul style="list-style-type: none"> EBRD PR10. 	PIU with a key role for the CLO.	SEP provided for full details of information to be disclosed and the timeframes (pre-construction and construction).	Disclosure of key documents in the public domain. Document grievances and response to grievances with records maintained.	

*Note: All documents referenced in the ESAP should be provided to EBRD for information purposes once developed and when updated.

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