



STAKEHOLDER ENGAGEMENT PLAN

Kapshagai - Kurty 67km Road Project, Part of the Reconstruction of the 'Centre-South' Corridor Linking Astana to Almaty

August 2018

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1. Introduction

1.1. Background

This document is a Stakeholder Engagement Plan (SEP) prepared for the Committee for Roads (the Client being JSC “NC “KazAutoZhol”), 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 Kapshagai - Kurty 67km Road Project that is 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 also outlines the general approach to stakeholder engagement and public consultation.

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

Specific objectives of the SEP are detailed below.

1.2. Objectives of the Plan

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

The 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 description, location of the road 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 extending finance for the reconstruction of the 67 km “Kapshagai-Kurty” of the “Centre - South” corridor linking the cities of Astana to Almaty. The finance is sought by the Committee for Roads within the Kazakhstan Ministry of Investment and Development. The 67 km Kapshagai-Kurty road section starts at Kapshagai Town and ends at the Kurty Village. The road section is located some 60 km north of Almaty.

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

The EBRD has previously financed other road sections that are part of the Centre - South corridor linking Astana to Almaty, including sections of the 228 km “Kurty Burybaytal” road. These were:

- Section 1: km 2152-2214, the 62km of the Burybaytal-Aksuek road section
- Section 2: km 2214-2295, the 81km of the part of the Kurty-Buybaytal road section

2.2. Reconstruction Planned and Road Setting

The proposed 67 km EBRD funded road section “Kapshagai – Kurty” is located on the territory of the Balkhash high plain, to the South of Lake Balkhash between Zhetysu Alatau in the southeast, Ile Alatau in the south and Chu-Ile mountains in the west. It is part of the larger transit “Centre-South” corridor of “Astana-Karaganda-Balkhash-Almaty” which is aligned in a south-eastern direction. Under the previous projects the EBRD provided finance for the adjacent road sections.

The road runs along the southwestern outskirts of the Balkhash plain along the Karaoy plateau, which is close to the Moyynkum sands in the southeast. To the north of the road the plateau shares borders with the sands of Abdilkum. The plateau is located in the interfluvium of r.Kurty – r.Kaskelen -r.Ile.

The proposed road section is located on the territory of two regional authorities:

- from 0 km to 2 - Kapshagai Town (Almaty region);
- from 2 to 67 - Ilyiski District (Almaty region).

The designed road is mostly on the same alignment as the current road, although there are five short sections of re-alignments.

The Project will include upgrades or new features such as a junction, off ramps, rest areas, bus stops, cattle underpasses, agricultural machinery underpasses, a bridge, traffic lights and an associated maintenance depot.

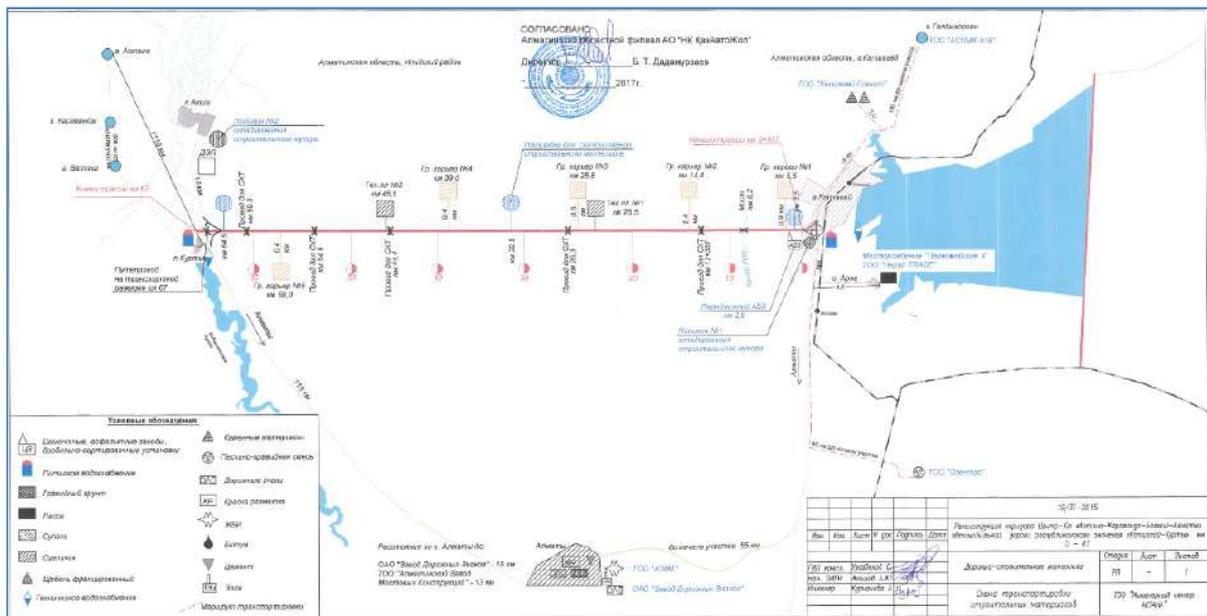
The road corridor runs on relatively flat terrain in a steppe / desert landscape. Small streams mostly permanently dry cross the road and there is also a wastewater channel that crosses the road. The area surrounding the road is partly used for non-intensive herding. At present, on some days the small herds from the settlements and the farms 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.

The road starts in Kapshagai where there are built up areas. The road will pass through two plots of land of which small section will be acquired, one designated for material base construction but unused and a plot of land that was previously occupied by greenhouses. The first realigned section passes near to some properties in Kapshagai. There are four other realigned sections of road outside of Kapshagai. Out of Kapshagai, the road passes by some 20 farms that can be viewed from the road. These are relatively small-scale farms with livestock including cattle, sheep and horses connected by predominantly dirt roads. Currently animals cross the road as there are a limited number of underpasses. There will be a number of sites along the road for ground storage of construction materials and construction compounds and a depot that will be constructed near to Kurty Akshi Village. There is only one bridge over a wastewater channel routing treated wastewater from Kapshagai. There are no businesses along the route apart from in Kurty where there is a café near to the road at the planned junction and there are a few businesses the first road alteration in Kapshagai.

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 concluded that there are no areas of cultural and historic importance in the region of the construction. It also stated that there are no natural monuments located in the area of operation.

Figure 1 shows the Kurty-Kapshagai section of the road.

Figure 1 Kurty-Kapchagai Road (P-18).



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

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

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

The 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. The EBRD sets out their stakeholder engagement requirements in the following documents:

- Environment and Social Policy (2014).
- Public Information Policy (2014).
- 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 Kurty - Kapchagai 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, 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, Iliyskyi District, Kapchagai town and other relevant local authorities e.g. Akshi Rural Area Council).
- Advisory non-governmental organisations.
- Services/suppliers (the design company and future Project Implementation Unit, KazAutoZhol in Almaty 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 6.3 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 is of crucial importance for the Project implementation process. The farms along the road will be directly affected by the Project. In addition, residents of Kurty village, Akshi village and Kapchagai town 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

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

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

Based on the data on affected individuals, there will be approximately 28 farmers and 3 commercial and industrial companies who are not land owners and as such can miss all compensation entitlements that are due to them based on the EBRD PR5 requirements. In addition, women, elderly, the disabled and individuals with chronic health condition or poor socio-economic status/background are categorised as 'vulnerable groups' and their concerns need to be addressed as part of this SEP process. During Project implementation the CLO will identify vulnerable groups who will then be added to the SEP and appropriate communication methods will be identified.

4.4. Project Affected People/Persons

In addition to those who can be subject to economic displacement caused by the project, individuals and households which are located within a close distance (less than 500m) to the construction corridor and road development activities belong to the Project Affected People category. At this stage, these people are categorised as 'Receptors' and the following mitigation measures are suggested:

- The house 400m southwest and the café 300m south of the Kurty junction are classified as being subject to blasting work impacts. The café is popular among the long-haul drivers. To ensure that any damage caused to their structures is accounted, pre-blasting survey shall be conducted with the presence of the owner. The baseline condition reports shall be signed by the owners. The CLO shall provide both properties with his contacts and the junction construction information including schedule and any changes to it as the work progresses. Any complaints shall be recorded and acted upon promptly. At the end of the blasting work, the post-blasting survey of these properties shall be conducted and any new evidence of structural damage will be recorded. The report is to be signed by the owner. Repairs shall be made to the damages that were absent in the pre-blasting report.
- Being only 50m from the Kurty junction, the farm 4 can be subject to construction air pollution of dust and noise and vibration. Although the farm house is not the sole dwelling of the owner who lives in Akshi village and uses the farm house more as an office, this may change with time. The CLO or his designee shall visit the site with the owner prior to the earthwork and explain him the nature, lateral and temporal extent, overall scale of the work, expected impacts and possible impact mitigation measures (e.g. reducing the rollers vibration power if excessive vibration inside the house is reported by the owner). The CLO shall give the owner his contacts.

4.5. 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. Women will be consulted on the Project activities, including land acquisition, location of construction camps, quarries and underpasses.

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 "NC "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 29th May 2017.

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, there were two public meetings. One of the public meetings was held on 3rd December 2015 in the town hall of Kurty rural district, Akshi village. The meeting was organised by the town hall of Akshi village. The invitation for the event and additional information on what would be shared was publicised in local newspaper Ile tany in Russian and Kazakh issued on the 13th November 2015.

The second public meeting was held at Kapchagai town hall on 15th June 2016. The meeting was organised by KazAutoZhol and Kapchagai town hall. The invitation for the event and additional information on what would be shared was publicised in local newspaper Нурлы ОЛКЕ No.25 (382) issued on the 8th June 2016. This short notice was non-compliant with the public consultation requirements that require a period of 20 days between the public note and the meetings. In addition to the newspaper publication, posters with information about public hearings were placed in post boxes of all the residential houses in the area as well as all the businesses located in Karlygash village. It is important that any future public consultation meetings meet the required period between publication and holding the meeting.

During the WSP site visit in 2018, it was gathered that the majority of land users and owners along the route were consulted by the Ili district council Akim and Kurty Akim on land acquisition process. Further information about consultation on land acquisition is available in Livelihood Restoration Framework (LRF).

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 "NC "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 Almaty is the body that will be responsible for the Project Implementation Unit (PIU) that has already been formed for the other EBRD funded road sections.

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

The project has all the required permits including the permits from the district councils for the borrow pits and temporary use of land. The construction contractor will need to obtain a construction permit for the working site via submission of the work camp plan and submission of the blasting work plan to the Emergency Situations Department in order to obtain the Order for Work prior to the construction starts. Blasting will be contracted to a licensed company that is responsible for the explosives safe and secure storage and use.

5.2. Summary of the Methods of Future Engagement Activities

Future stakeholder engagement will be built 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.
- Land owners, land users, vulnerable groups, local community (including people living within a close distance to the project) and 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 PIU will perform the Project Management Consultant (PMC) role will include internal monitoring reports from 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. Consultations

Consultation with affected land owners and users (formal and informal)

As per Livelihood Restoration Framework (LRF) and subsequently a Livelihood Restoration Plan (LRP), meetings will be conducted with affected land owners and users on land acquisition (temporary and permanent), compensation measures and livelihood restoration. The meetings will be undertaken through local Akims and prior to the land acquisition process.

Consultation with affected individuals and vulnerable groups

All affected people and vulnerable groups within the project area of influence will be consulted regularly throughout the project lifetime. Akims of each district will be responsible for conducting these meetings. Focus groups will also be conducted with women, the disabled, elderly and people from poor backgrounds to ensure that their needs and concerns are addressed in relation to the Project impacts. Local people will also be consulted on the location of construction camps, new quarries (if any) and underpasses.

ESIA Public hearing

A public hearing will be conducted and the ESIA (including Non-Technical Summary and Environmental and Social Action Plan) report will be disclosed to local affected communities

for review. The disclosure period as per the requirements of the EBRD is 120 days. The ESIA report will be placed at a community centre and the Project will ensure that all affected communities will have access to it. The results of this consultation will be included into the Final ESIA document.

6.3. 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:

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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 1 Future Stakeholder Engagement Programme

Stakeholders	Communication method	Information to be disclosed	Timeframe
People affected by land acquisition (including formal and informal land owners/users) or restricted access	Information boards with post box and personal visits to herders and farm houses through local Akims	NTS, grievance mechanism, vacancies, EIA, EIA supplements, LRF/LRP, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any)	Prior to construction During project implementation weekly update on grievances and quarterly update on vacancies
Affected people, residents and employees of farms and villages,	Information boards with post box and personal visits. Documents on request in Karaoy, Akshi, Kurty and Kapchagai	NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any)	Prior to construction During project implementation weekly update on grievances and quarterly update on vacancies
Residents of other villages in the area	Information board, mass media, internet, documents on request in Karaoy, Akshi, Kurty and Kapchagai	NTS, grievance mechanism, vacancies, EIA, EIA supplements, SEP, ESAP, timeline of construction, location of construction camps, underpasses, and potential new quarries (if any)	Prior to construction and during project implementation Quarterly update on vacancies
Regional public	Newspapers, internet, Almaty job centre	NTS, grievance mechanism, vacancies	Quarterly update
Regional mass media	Telephone, e-mails	Detailed project information and NTS on request	Quarterly update
Local NGOs	Telephone, newspaper, documents and meetings on request	Detailed project information on NTS on request	Quarterly update
Village area and district councils	Meetings, telephone, e-mail, information boards in council buildings	EIA, EIA supplements, NTS, SEP, ESAP, vacancies	Quarterly update
Construction workers	Information boards and meetings in construction camp canteen	NTS, health and safety requirements, workers protection requirements, workers' grievance mechanism	Prior to construction, monthly updates during construction
Suppliers of goods and services	Information boards with post box in Kurty village and KazAutoZhol office in Almaty, internet	NTS, tender documentation and results, contractor selection process, procurement requirements with EHS and workers protection requirements, grievance mechanism	Quarterly update
Sanitary Epidemiological Service (SES)	Hand delivery of documents to regional SES office for approval	EIA, workers' camp design	Before EIA State Expertise
Emergency Situation Office	Formal e-mails, meetings and telephone calls with the regional department	EIA, Emergency Preparedness and Response Plan	Prior to construction and feedback after an emergency
Ministry of Agriculture District Department	Official correspondence	Approval of sufficiency of underpasses and off-ramps	Before detailed design is completed
Ministry of	Correspondence, hand	EIA, reports on emissions,	Prior to construction

Agriculture	delivery of reports to the Astana Office and the regional department office	use of resources and compliance with legislation and permits	Biannual submission
International NGOs and all above	No direct contact, documents available on EBRD and KazAutoZhol websites	NTS, EIA and supplements	120 days before EBRD Board discussion and for the loan duration

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 6.3.

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:

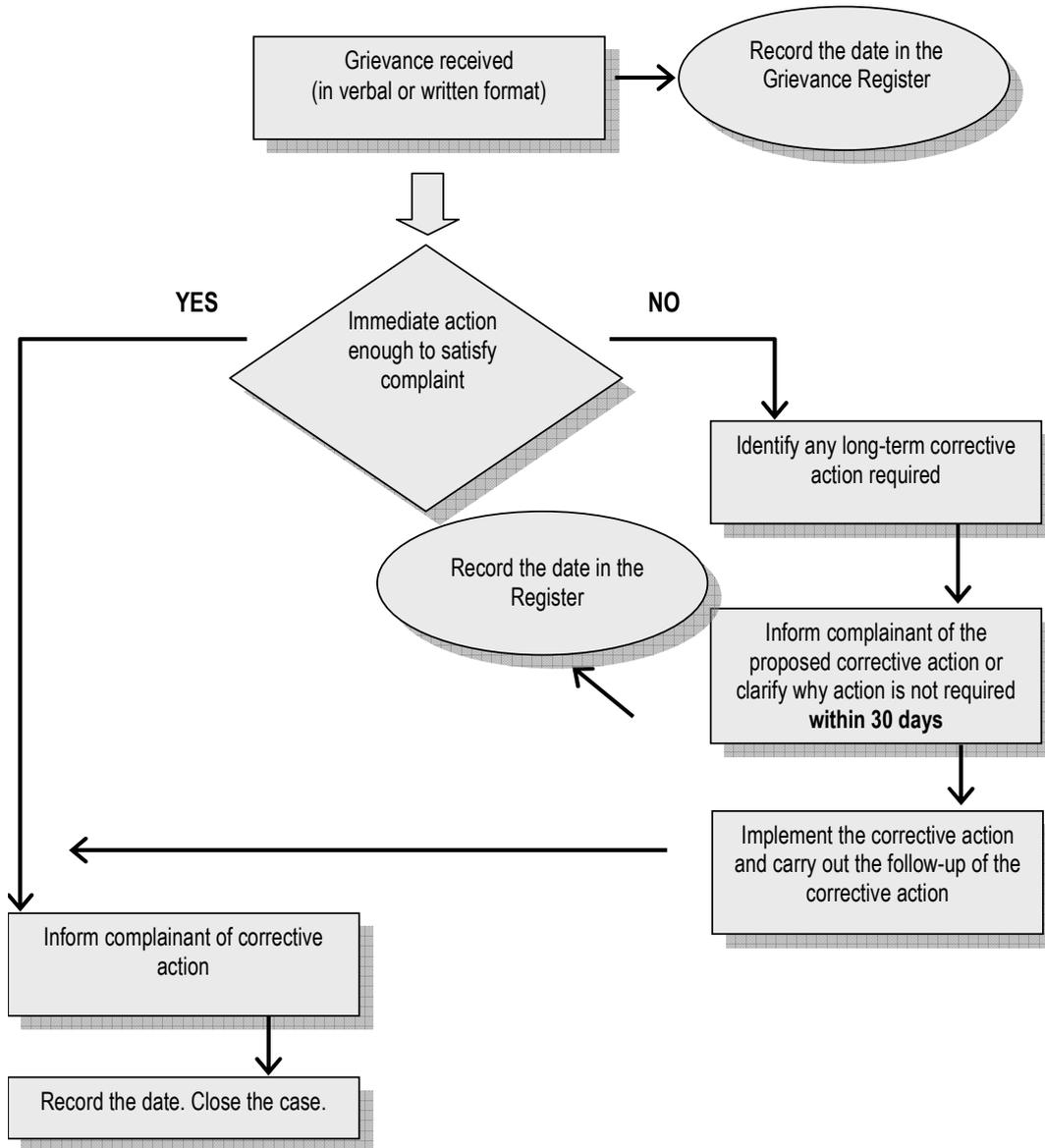
- Stakeholder name and contact details.
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

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



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.

Name of the Person and Title	Contact Information
Aliya Zeinullina Environmental and social issues specialist of the JSC “National Company “KazAutoZhol” – “Construction Directorate”	Telephone: +7 701-982-66-57 Address: 24 Respublika ave., Astana Email: a.zeinullina@kazautozhol.kz Website: www.kazautozhol.kz

7.4. Community Liaison Officer

JSC “NC “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.

Figure 3 Public Grievance Form

Reference No:	
Full Name Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ I wish to raise my grievance anonymously I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail _____
Preferred Language for communication	Russian Kazakh
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	One time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Appendix 1 – Grievance Log

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

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