

# **Stakeholder Engagement Plan**

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**100 MW SHOKPAR WIND POWER PROJECT**

November 2022

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November 2022

### Public

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# 1. INTRODUCTION

## 1.1. Background

This document is a Stakeholder Engagement Plan (SEP) for a 100MW Shokpar Wind Power Plant (WPP) Project. This document identifies relevant stakeholders and defines communication channels and plans regarding the construction and operation of a 100MW WPP in Zhamybl region, southern Kazakhstan.

The SEP provides an overview of national legislation, the European Bank for Reconstruction and Development (EBRD) Environment and Social Policy (ESP) 2019, the EBRD Performance Requirement 10: Information Disclosure and Stakeholder Engagement, European Union (EU) directives and international best practice related to information disclosure. It outlines the general approach to stakeholder engagement and public consultation.

The SEP is a live document, being reviewed periodically during project implementation. It will be updated as necessary in line with new or changed activities, changes in Project design or newly identified stakeholders.

## 1.2. Objective of the Plan

This SEP is a public document, which sets out the implementing body's commitments relating to stakeholder engagement, consultation and disclosure activities in connection with the proposed EBRD investment for the Shokpar WPP.

Shokpar Wind Power Station LLP (SWPS) will be the company undertaking the construction and operation of the WPP included in this Project. The public will be able to access and review this SEP (in Kazakh/Russian and English) at the well as on the Project website (when is to be set up).

The goal of this SEP is to set out how stakeholder engagement will be carried out for the Project and how long-term relationships between the Shokpar WPP project and the local communities will be maintained. This SEP also aims to inform, improve and facilitate decision-making that involves Project-affected people and other interested stakeholders in an inclusive and timely manner, and to ensure that these groups are provided with sufficient opportunity to voice their opinions about the Project.

The SEP briefly describes the public consultation carried out to date and defines activities that will be implemented by the Project to inform stakeholders about the nature and the potential impacts associated with the wind power plant.

The SEP contains a stakeholder table where 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 touch with the contact provided above to receive information about the Project and be added to the stakeholder engagement programme in this SEP.

Specific objectives of the SEP are detailed below:

- Define the Project area;
- Identify, map and assess affected parties and other interested stakeholders, and how they may be affected by or interested in the Project;

- Set out stakeholder analysis undertaken to understand Project stakeholders, so that appropriate methods and tools to engage them can be developed;
- Provide an action plan for consultation that allows for meaningful stakeholder input into the Project;
- Ensure stakeholders have access to information on Project activities in a timely manner;
- Ensure information disclosed to stakeholders can be understood and locations for consultation are accessible to all who want to attend;
- Ensure that any vulnerable groups are identified and consulted;
- Establish clear mechanisms for answering stakeholders' questions, concerns and grievances; and
- Document formal consultation and information disclosure activities, define stakeholder tracking and records management system.

The implementation of this SEP will be the responsibility of the following person:

**Nauryzbek Zhumagazin, Local Administrative Manager**

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### 1.3. Scope of the Plan

This SEP covers SWPS' operations on the Shokpar WPP Project, including the contractor's activities. The Plan comprises the following sections:

- Chapter 2 – Project Background
- Chapter 3 – Consultation and Disclosure
- Chapter 4 – Stakeholder Identification
- Chapter 5 – Stakeholder Engagement Programme
- Chapter 6 – Reporting and Grievance Mechanism

## 2. PROJECT BACKGROUND

SWPS are planning the construction of a 100MW installed capacity wind power plant in the Sarysu district of the Zhambyl region, Kazakhstan (See Figure 1 below). The Project comprises 22 Envision (EN-156) 4.8MW wind turbine generators (WTGs), a new 220kV step-up substation, and a double line 220kV overhead transmission line linking the new substation with the existing Opornaya grid connection point (See Figure 2 below for Project layout). The existing Opornaya substation will be extended to include 220kV feeders to accommodate the new connection lines.

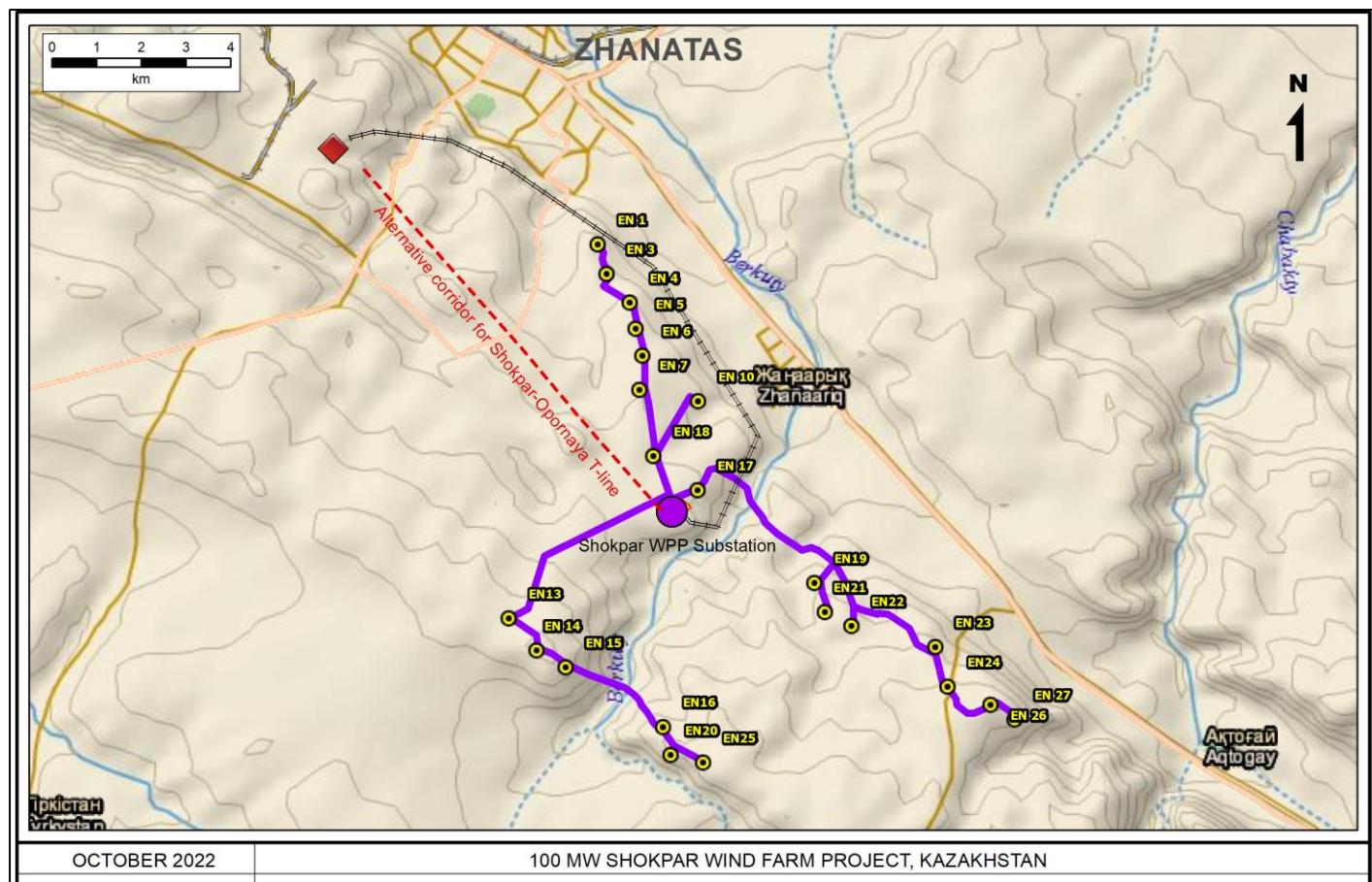
The Project is currently in the early construction phase with works having begun in June 2022 and are expected to last for 19 months. The commissioning of the wind plant is scheduled to take place in January 2024.

**Figure 1 – Location of the Shokpar WPP in the Zhambyl Region**



The WPP Project aims to provide a sustainable source of renewable energy to the region and contribute towards Kazakhstan's Nationally Determined Contribution targets. In the long term, an increase in revenue and local budget is envisaged and the overall reliability of the area's power will be increased.

**Figure 2 – Location of the Shokpar WPP near Zhanatas**



### **3. CONSULTATION AND DISCLOSURE**

The Project will conform to key national legislation regarding stakeholder engagement and information disclosure, alongside ratified international conventions and EBRD Performance Requirements.

#### **3.1. National Legislative Requirements**

According to Kazakhstan legal regulations, information disclosure and dissemination, as well as public consultation, are a part of the development process, especially if a project is likely to impact on the environment.

The existing environmental legislation requires OVOS (local Environmental Impact Assessment) implementation on all stages of economic activity from the initial plans through design, construction, and exploitation until facility closure. Foresight and ecological risk assessment is the main object of OVOS with State ecological expertise aimed at checking this.

The key legislative act relating to public participation in decision making within Kazakhstan is the Environmental Code. **The New Environmental Code** (as of 2 January 2021) includes a number of key requirements directly applicable to industry development and/or operational projects, associated with the following activities or issues:

- Obtaining Integrated Environmental Permit;
- Implementation Best Available Technologies (BAT);
- Meeting new requirements for all stages of OVOS (local EIA) processes;
- Meeting new regulations for waste classification and waste management;
- Installation of continuous and automated emission monitoring systems;
- Full involvement of project stakeholders (attached to OVOS/EIA process)
- Compliance to international agreements, and conventions ratified by the Republic of Kazakhstan (also attached to OVOS procedure).

Additionally, the Environmental Code sets out the process for environmental permitting, including the environmental impact assessment (OVOS/EIA) procedure. The OVOS sets the basis for the permitting process and the OVOS document establishes an estimate of all air pollutant emission loads by source as well as a maximum limit of effluent discharges into receiving water bodies. Once an OVOS document is completed and approved by the local authorities, the permitting process is started, and permits are issued in accordance with levels set out by law and in the OVOS.

All stakeholder engagement activities are limited to the OVOS procedure, whereby the outcomes and findings of the OVOS are required to be disclosed to key stakeholders and public for comments/feedback. Stakeholder engagement is done by means of organizing public hearings. The legislation also requires organizing public hearings every time the annual environmental action plan is released prior to its approval by local authorities. There is no external grievance mechanism for dealing with comments and complaints from stakeholders.

As such the current legislative system provides guidelines for public consultation and participation in decision-making, although the scale of such activities is dependent on the type and scale of the proposed project and degree of public interest. Below is a brief overview of the stakeholder engagement and public participation process as specified in the new Environmental Code (2021):

**OVOS (EIA) report –public hearings.** The EIA draft report is subject to public hearings with the participation of representatives of interested state bodies and the public. The authorized body in the field of environmental protection, within two working days after receiving the documents, releases the draft EIA report on the official Internet resource along with the announcement of holding public hearings; as required, the authority also sends the draft report to the interested state bodies (other ministries and agencies). Twenty days (20) prior to the public hearings date, the OVOS/EIA initiator is required to publicly announce the date, time and venue of the public hearings by placing announcements in Kazakh and Russian languages in at least one newspaper and through at least one TV or radio station, broadcasting locally and regionally.

Public hearings are open to any person wishing to take part, regardless of their place of residence. In the process of holding public hearings, any person participating has the right to raise any comments, concerns and suggestions on the draft report on possible impacts in accordance with the established rules for holding public hearings. Public hearings are held under the chairmanship of a representative of the local executive body of the relevant administrative-territorial unit. The local executive body of the relevant administrative-territorial unit provides video and audio recordings of the entire course of public hearings. Electronic media with video and audio recordings of public hearings is subject to attachment to the protocol of public hearings.

The duration of public hearings shall not exceed five (5) consecutive business days. After completion of public hearings, a protocol is produced, which at a minimum must include the following:

- all comments and suggestions of interested state bodies and the public, submitted in writing
- answers and comments of the initiator on each remark and proposal,
- information on the right to appeal the protocol in the manner prescribed by the legislation of the Republic of Kazakhstan.

The secretary of public hearings prepares the minutes of public hearings and is responsible for the completeness and accuracy of the information reflected in it. The protocol is signed by the chairman and secretary of public hearings within two working days from the date of completion of public hearings.

The local executive body of the relevant administrative-territorial unit shall post the signed protocol on the official Internet resource no later than two working days after its signing. After signing the protocol of public hearings, the following activities are carried out:

- in the absence of comments and any feedback of the interested state bodies and the public in the protocol, the chairman of the public hearings sends the signed protocol to the authorized body in the field of environmental protection within two working days to prepare an opinion on the results of the environmental and social impact assessment;
- if there are comments and suggestions from interested state bodies and the public in the protocol, the initiator ensures that the draft report on possible impacts is finalized in accordance with such comments and suggestions; when all comments/feedback/concerns are addressed, the final OVOS/EIA report is sent to the authority for final approval.
- When the authority formally approves the EIA report, the second formal public hearing are to be organized in the same way as the initial hearings.

### **3.2. EBRD Requirements**

The Project will adhere to EBRD Environmental and Social Policy (ESP) 2019 and the EBRD Performance Requirements (PRs). The EBRD PR 7 (Indigenous Peoples) and PR 9 (Financial Intermediaries) are not applicable for this Project.

The main PR associated with Stakeholder Consultation and Information Disclosure is PR 10. The key pertinent requirements of this PR are:

**Table 1: EBRD PR10 Requirements**

- Identify the various individuals or groups i) who are affected or likely to be affected by the Project; or may have an interest in the Project.
- Identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status. The Project may need to use different methods of engagement due to differing issues such as age, gender and ethnicity.
- Disclose relevant Project information to affected stakeholders; information needs to be accessible and culturally appropriate.
- Conduct a meaningful consultation with affected parties; ensure that the consultation is inclusive, culturally appropriate and conducted in the local language.
- Establish an effective grievance mechanism, process or procedure to receive and facilitate resolution of stakeholders' concerns and grievances.

### **3.3. Existing Stakeholder Engagement and Community Awareness Programmes**

Shokpar Wind Power Plant LLC has been engaging with various project stakeholders since 2020, which coincided with the preparation phase of the Screening EIA report. The Project Company has engaged with the following institutions and stakeholders:

- Zhanatas Akimat
- Zhanaaryk Akimat
- Aktogay Akimat
- Kazphosphate LLC
- EuroChem LLC
- Local public (residents of Aktogay and Zhanaaryk)

#### **Screening EIA: Disclosure and Public Hearings**

As required by local legislation, no later than 30 days prior to EIA report disclosure and public hearings, the announcements for public hearings were advertised through local newspaper "Sarysu", through local Radio Zhanatas and via announcements on information board at the Akimat's entrance (Figure 1).

Formal screening EIA public disclosure/hearings meeting was held in the village of Zhanaryyk at 6PM on 21 January 2022. The total of 27 attendees participated in the meeting. The Company representatives disclosed information about the proposed Project and answered the questions from participants. In accordance with the meeting protocol, the key issues raised by local residents involved the following:

- a concern about noise generated by construction and operation of the wind park; and
- employment opportunities for local residents.

**Figure 3 - Announcements for a 100MW Shokpar Wind Power Plant EIA Public Hearings**



As reported, Shokpar Wind Power Plant LLC plans to set up a contact website alongside a social media page for the community to observe ongoing construction and submit their queries.

#### **Additional stakeholder engagement and consultation activities**

On August 17, 2022, as part of Lender's project's E&S due diligence assessment, the Project Company and Project Investors carried out a number of additional high-level consultations with Project stakeholders (summarised in Table 1).

It was noted that the Project Company and the Project Investor had managed to build a constructive relationship with the local authorities. The Akimats expressed deep interest in wind power development taking place in the region and promised full support as needed to the wind developers and investors.

Akim of Sarysu shared information about prospective plans for wind power resource development in the region. According to his information, there is a memorandum between local authorities and (collectively) investors and wind developers to expand the total wind resource development capacity to 400MW – all attached to the northern slope of the Ulken Aktau Ridge along the Karatau-Zhanatas highway.

**Table 1 - Stakeholder Meetings held during Site Visit**

<b>Meetings Held</b>	<b>Key Points Discussed at Meetings</b>
<p>Meeting in the Akimat of Sarysu:</p> <ul style="list-style-type: none"> <li>- Akim of Sarysu District</li> <li>- Akim of Zhanatas;</li> <li>- Akim of Aktogay; and</li> <li>- Akim of Zhanaaryk.</li> </ul>	<p><b>Shokpar WWP – overall status and progress</b></p> <p>The Project Company provided a summary on Project's current status – local permitting/licensing and compliance; status of construction works</p> <p><b>Public perception of the Shokpar Wind Power Plant project?</b></p> <p>It was stated that the project will contribute to community development and help attract investment to the region. It was reported that the Akimat of Sarysu, Akimat of Zhanatas, AKimat of Zhanaaryk and AKimat of Aktogay fully support the project.</p> <p><b>Were there any objections from the communities?</b></p> <p>None were reported. Local residents observed the development of Zhanatas wind park project; at an early stage the Shokpar project benefits for the community had been explained to the local residents by Akims of all four Akimats. Due to the lack of businesses in the villages, support for the project was high particularly as it would yield taxes that would be directed to the local economy and the villages would welcome this investor and others that can contribute to community development.</p> <p><b>Brief discussion over turbines transportation routes and potential effects on community?</b></p> <p>The Project Developer stated that the wind turbines will most likely be transported during the night time and all the required permits to allow for transportation and installation will be obtained. In terms of road suitability to transport wind turbine towers and blades, it was reported that towers would be in sections, however blades would not (67 m length) and therefore some road sections might need to be widened / modified (especially secondary local roads) to address the vehicle turning radius.</p> <p><b>Ice throw and noise effects</b></p> <p>On ice throw impacts, the Company stated that the closest to the residential area WTG is situated within 1.2 km and there is no risk of ice throw; additionally, it was stated that there is a 400 m buffer zone for ice throw, although this was unlikely as de-icing of wind turbine blades will be undertaken in winter months to protect the wind turbines for technical reasons. Access to the turbine will be restricted by installation of barriers with proper signage (no trespassing; no unauthorised access). With respect to noise effects – Akims and local residents participating in the meeting indicated no adverse noise effects from existing and operational Zhanatas wind farm; the expectation from public is that Shokpar wind park will not disturb local residents.</p>

## 4. STAKEHOLDER IDENTIFICATION

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

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

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

The key stakeholders identified are presented in Table 2.

**Table 2: Key Identified Stakeholders and Interest in the Project**

Stakeholder Category	Type	Name	Interest in Project
Primary	Project Developer	SWPS	Decision-making process and Project implementation.
	Sponsor(s)	Visor International (VISOR) and China Power International Holding (CPIH)	Decision-making process and successful Project implementation.
	Local and District Authorities	Sarysu Akim (Governor) Zhanatas Akim, Zhanaaryk Akim and Aktogay Akim	Identifying local needs and providing feedback on Project-related issues and construction phase impacts to the Company.
	Public Governance Council		Representing the local population and distributing Project updates to the local community.
	Zhanatas Community Service Centre		Disclosure of Project information to the local community.
	District Job Centre		Disclosure of employment opportunities at each stage of the Project to local communities.
	Communities & Businesses	Local landowners, local herders, businesses, residents and job	Benefitting from employment opportunities and stability of energy supply. Noise and traffic during construction.

<b>Stakeholder Category</b>	<b>Type</b>	<b>Name</b>	<b>Interest in Project</b>
<b>Secondary</b>		seekers (including vulnerable persons <sup>1</sup> )	
	NGOs	Association for the Conservation of Biodiversity Kazakhstan (ACBK).	Understanding the Project components and their impact on biodiversity and conservation efforts.
		The Association of Renewable Energy of Kazakhstan (AREK)	Understanding the level of contribution made by the Project to mitigating climate change and its promotion of renewable investments in the Zhambyl region.
	Contractors	GCD and Shanghai Institute of Mechanical and Electrical Engineering (SIMEE)	Tenders, material and equipment suppliers and participation in the implementation of the Project.
	Construction workers	Local individuals, based in Kazakhstan	Contractors are engaged to carry out the construction works.
	Supervising Engineers	Build Master Group (BMG Ltd.), and Dostar Stroy (DSG)	Monitoring and technical supervision during construction and conducting site audits for Project technical compliance
<b>Lender</b>	Local Media	Novyi Region and Sarysu newspapers	Project development and impacts on local communities
	Lending Organisation	EBRD	Provide the loan to finance the Project, alongside certain environmental, social and technical requirements.

<sup>1</sup> Under the EBRD Environmental and Social Policy (2019), “vulnerable people” are defined as those who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may also include, but are not limited to, people in vulnerable situations, such as people living below the poverty line, the landless, single-headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.

## **5. STAKEHOLDER ENGAGEMENT PROGRAMME**

### **5.1. Disclosure of Information**

The types of information disclosed and the specific methods of communication to be undertaken for this project are summarised in the Stakeholder Engagement Programme in Table 3 below. The objectives of external communications are to provide regular engagement with affected people and other relevant stakeholders and to inform them about the existing activities, performance, development and implementation of the Project. The information to be disclosed publicly is governed by EBRD's Public Information Policy, EBRD PR 10 and Kazakh national legislation.

The SEP is a live document that will be revisited and updated during each project implementation stage, if necessary, on at least an annual basis (or when changes are made) to reflect the changes in stakeholder engagement due to project developments and identification of new stakeholders. 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 3 are not exclusive and SWPS may choose to disclose more information upon request by stakeholders.

SWPS is responsible for internal and external communications regarding the existing and future projects and will be the main contact point for affected or concerned people. All related Project documents and communication related to the Project will be available and undertaken in Kazakh, English and Russian languages as required by national legislation and based on language needs of the stakeholders.

### **5.2. Stakeholder Engagement Programme**

The Stakeholder Engagement Programme envisages that consultation meetings will take place with relevant interested parties prior to the commencement of the Project as well as during the project implementation, if necessary. Consultation and engagement activities are required to address current stakeholder suggestions, ideas or concerns. In order to receive their full engagement, stakeholders will be able to use several channels (phone, e-mail, and website) for receiving more details about the project or state their comments, ideas throughout the project life cycle.

Stakeholders will be able to attend consultation meetings and be informed of project activities, contact persons and the established Grievance Mechanism in detail, including channels for receiving information. Minutes will be taken at all stakeholder meetings and will include a signed attendance register.

Any concern or grievance raised prior or during the project implementation will be collated and logged by SWPS as well as by contractors. Stakeholders can use the grievance boxes to be situated on every construction site and grievances can be submitted anonymously. Complainants have right to request protection of their confidentiality and their personal details not disclosed outside Company's grievance resolution process. In general, grievances and complaints related to project, company or its contractors can be submitted via several channels:

- ❖ By phone: +7 727 355 8844
- ❖ Email: [info@sarysuwpp.kz](mailto:info@sarysuwpp.kz)

- ❖ By post to following address: Zhambyl Region, Sarysu District, Zhanatas City, m.d. 1, Building 2, Apt. 4

The contractor and subcontractor companies will assist in this process by escalating of any grievances received to SWPS. Stakeholders have the opportunity to use the channels the most convenient for them for submitting grievances or receiving information.

All comments received will be reviewed in accordance with the commitments made under best international practise presented within the ‘EBRD Requirements’ section provided in Section 3. All communications will be reviewed for the feasibility to make changes to satisfy the request and interest and the communicator will be informed of the outcome.

The Stakeholder Engagement Programme is detailed in Table 3 below:

**Table 3: Future Stakeholder Engagement Programme**

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
▪ <b>SWPS</b>	<ul style="list-style-type: none"> <li>Internal meetings with all involved parties including the Supervising Engineer, Project Designer and contractors on an as-needed basis</li> <li>At least one E&amp;S kick-off meeting with each contractor to outline E&amp;S requirements.</li> <li>At least two meetings should be held with the Project Designer to first explain E&amp;S requirements and then review the designs.</li> <li>SEP implementation person to provide answers to incoming email, telephone and in-person communication from external stakeholders.</li> <li>CLO to maintain regular contact with Zhanatas rural area councillors to update on the Project.</li> </ul>	<ul style="list-style-type: none"> <li>Updates on the ESAP, SEP, ESMP and CEMP implementation if necessary.</li> </ul>	<ul style="list-style-type: none"> <li>Meetings held before construction upon contract signing, during construction</li> </ul>
▪ <b>Local Authorities</b>	<ul style="list-style-type: none"> <li>Announcement of the Project through the Zhanatas Rural</li> </ul>	<ul style="list-style-type: none"> <li>Description of the Project design, timeline, and</li> </ul>	<ul style="list-style-type: none"> <li>Prior to construction completion.</li> </ul>

<b>Stakeholders</b>	<b>Communication Method</b>	<b>Information to be Disclosed</b>	<b>Timeframe</b>
<b>District and Regional Regulatory Bodies</b>	<p>Council website and supporting email.</p> <ul style="list-style-type: none"> <li>▪ Meetings with SWPS</li> <li>▪ Formal submissions from SWPS</li> </ul>	<p>reasoning for construction.</p> <ul style="list-style-type: none"> <li>▪ Decisions on local licensing or planning permissions.</li> </ul>	
<b>Communities &amp; Businesses</b>	<ul style="list-style-type: none"> <li>▪ Meetings with SWPS during the design phase</li> <li>▪ Formal submissions from SWPS.</li> <li>▪ Update meetings with SWPS during construction.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Formal submission feedback for SWPS e.g., EIA conclusions, permitting, and licencing decisions.</li> </ul>	▪ During the design phase and during construction for ongoing monitoring.
<b>NGOs</b>	<ul style="list-style-type: none"> <li>▪ Meetings between SWPS and representatives from the Public Governance Council organised by the district councillor.</li> <li>▪ 2 open session meetings between Public Governance Council representatives and affected community members.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project information including employment opportunities, and the grievance mechanism process.</li> <li>▪ Schedule of works for the construction phase.</li> <li>▪ Temporary access limitations and control measures being undertaken by contractor to limit disturbances.</li> </ul>	▪ Throughout the construction phase.
<b>Contractors</b>	<ul style="list-style-type: none"> <li>▪ Dissemination of Project information via email or telephone by the CLO</li> <li>▪ Information published on the Project website.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Key environmental risks posed by the Project i.e., negative impacts on rare or protected species and proximal conservation areas such as IBAs,</li> <li>▪ Measures being undertaken to mitigate impacts on biodiversity and conservation.</li> <li>▪ Positive impacts of the Project on climate change mitigation and renewable investments in the region.</li> </ul>	▪ Throughout construction and operation.
	<ul style="list-style-type: none"> <li>▪ Meetings attended by SWPS representatives periodically on a needs basis.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP, ESMP and CEMP implementation on an as-needed basis</li> </ul>	▪ SWPS meetings held during early construction upon contract signing, and as needed during the construction phase.

Stakeholders	Communication Method	Information to be Disclosed	Timeframe
	<ul style="list-style-type: none"> <li>▪ Meetings with the Supervising Engineer to report and discuss E&amp;S measures and processes during construction.</li> </ul>	<ul style="list-style-type: none"> <li>▪ E&amp;S issues and data shared with Supervising Engineer, and resolutions to issues found.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Contractor E&amp;S Lead to meet with Supervising Engineer weekly during construction.</li> </ul>
▪ <b>Construction workers</b>	<ul style="list-style-type: none"> <li>▪ Contractor E&amp;S Leads instruct and direct contractor workers in E&amp;S measures and processes on-the-job.</li> </ul>	<ul style="list-style-type: none"> <li>▪ E&amp;S (particularly Health &amp; Safety) measures and process to follow.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Throughout construction.</li> </ul>
▪ <b>Supervising Engineer</b>	<ul style="list-style-type: none"> <li>▪ Meetings attended by SWPS representatives.</li> <li>▪ Meetings with contractors to discuss E&amp;S measures and processes during construction.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP and CEMP implementation on a need basis.</li> <li>▪ E&amp;S issues and data shared with Supervising Engineer, and resolutions to issues found.</li> </ul>	<ul style="list-style-type: none"> <li>▪ SWPS meetings held during early construction upon contract signing, throughout construction phase.</li> <li>▪ Contractor E&amp;S Lead to meet with Supervising Engineer weekly during construction.</li> </ul>
▪ <b>EBRD</b>	<ul style="list-style-type: none"> <li>▪ Annually and on an as-needed basis, environmental, social and health &amp; safety updates from SWPS</li> <li>▪ Annual Environmental and Social Reports.</li> <li>▪ Provided through meetings and/or email by the Project Director.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Updates on the ESAP, SEP and ESMP implementation and overall E&amp;S performance.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Annually and on an as-needed basis meetings before construction, during construction, and during the duration of the project.</li> </ul>
▪ <b>Local Media</b>	<ul style="list-style-type: none"> <li>▪ Information from the Project website.</li> <li>▪ Representatives meeting with the CLO to ask questions relating to the Project.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Discussion of the potential socio-economic opportunities provided by the Project.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Prior to the finalisation of construction.</li> </ul>

For more information and comments, stakeholders can use the contact information below:

**Name:** Nauryzbek Zhumagazin, *Local Administrative Manager*

**Address:** Zhambyl Region, Sarysu District, Zhanatas City, m.d. 1, Building 2, Apt. 4

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In summary of the table above, the **key communication methods** for this assignment are described below:

#### A. Internal SWPS Environmental and Social (E&S) Meetings

These meetings will provide time for the Company to organise the implementation of environmental and social (E&S) actions, as well as an opportunity for the Supervising Engineer and contractors to provide updates on their implementation of the CESMP and E&S actions during construction to SWPS. The interaction between SWPS, the Supervising Engineer and the contractors will be stipulated in their scope of works and included in their individual contracts. This will involve regular communication between all three parties.

#### B. Meetings with Local Authorities and Regional Regulatory Bodies

The CLO for the Project will maintain communication with the district and local councils to identify and local needs and project-related issues or apprehensions. Additionally, the District Job Centre will be notified about employment opportunities for local communities generated by the Project. These meetings will also be used to facilitate any required permitting, licensing and planning for the Project to ensure that it complies with local and national legislation.

#### C. Local Communities and Business Owner Meetings

Local residents and owners of the businesses near the Project site will be able to provide their feedback to SWPS through representatives of the Public Governance Council to ensure that planned construction does not hinder specific business activities or cause undue nuisance and disruption.

#### D. Local Media Engagement

The Project website, together with other methods, will be used for information sharing purposes. Concerned individuals will have possibility to submit questions/comments. The SWPS CLO will be responsible for monitoring and responding to media reactions, comments, questions and pictures submitted, as necessary.

#### E. EBRD E&S Meetings

SWPS will provide annual (and on-a-needs basis) environmental, social, health and safety updates to the European Bank of Reconstruction and Development during the construction phase and operation phase. These updates will demonstrate the implementation of E&S actions agreed before the loan ratification. This includes actions to be carried out by the contractors and the Supervising Engineer.

#### F. Meetings with NGOs

After contacting regional NGOS that may be interested in the Project, SWPS will organise meetings on a needs basis to discuss the environmental and social protection measures being put in place. International NGOs with an interest in the Project will obtain information on the project website.

## **6. REPORTING AND GRIEVANCE MECHANISM**

### **6.1. Monitoring, Reporting and Feedback Mechanism**

SWPS will monitor the communication channels and will provide feedback as appropriate. A complaint box at the Project site will be available for stakeholders during the construction phase and complaints can also be submitted by, post, emailing and telephoning the SEP Implementer. Any complaints, including verbal complaints, will be registered in the grievance database by the SWPS contact person.

In order to monitor the implementation of this SEP and the functioning of the grievance mechanism, SWPS will confirm to EBRD that the arrangements are in place and operating. This will include the sharing of notes, minutes and/or documentation on engagement activities undertaken, including all information disclosure undertaken as part of the SEP. In line with the SWPS submission of the Annual E&S Report, EBRD will also annually assess the SEP implementation.

### **6.2. Grievance Mechanism**

SWPS will operate a Grievance Mechanism established in-line with international best practice.

Any comments or concerns can be brought to the attention of the company verbally (in person or over the phone) or in writing by email or filling in a grievance form. The grievance form can be submitted in person in the complaints box at the Project site buildings or online via email

The grievance form and information on the procedure (including contact persons) will be made available on the Project website, during engagement activities, and at the Project site. Information banners will also be placed on designated noticeboards at each construction site.

All grievances, including anonymous submissions, will be recorded in the grievance database. The CLO, Supervising Engineer and SWPS will cooperate closely, sharing all information regarding any complaints or dissatisfaction.

The grievance database will store the following information on the complaints received:

- Complaint number
- Category (aka subject of the grievance)
- Name of complainant (if provided)
- Complainant gender
- Complainant address
- Contact details of complainant
- Date of complaint receipt
- How complaint was received
- Recipient of the complaint
- Description of the issue
- Date of response
- Date and status of final resolution
- Entities involved
- Grievance resolution and status
- Notes on current status e.g., resolution activities planned and progress
- Number of days between complaint receipt and complaint acknowledgement
- Number of days between complaint receipt and complaint resolution

### 6.3. Grievance Resolution

If grievances are submitted on site, the Contractor Company will be responsible for logging complaints and solve them according to Stage 1. In case the contractor cannot solve the complaint the Company will be involved in the process as it is described in Stage 2. The Company will be responsible for receiving the complaint log from Contractor Companies. Stakeholders have the opportunity to use one of the stages for submitting grievances. They can directly apply to Stage 2.

All verbal or written complaints or grievances will be logged immediately after they are received by the contractor or SWPS. Complaints will be acknowledged and responded to (first response) within 5 working days. Resolution will be proposed within **10 working days for Stage 1 and 30 working days for Stage 2** from acknowledgement of the grievance, however the Contractor and SWPS will aim to respond to complainants and resolve the issues as quickly as possible from the date of receipt. 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. Grievances submitted will be solved and followed-up in accordance with the procedures given below:

- **Stage 1** – Contractor Company receives and solves complaints. If at Stage 1 the complainant's grievance is not solved, he/she will be informed about grievance resolution procedures of Stage 2. The complainant has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. SWPS will be aware of all the grievances submitted at Stage 1 through the grievance database and will monitor their resolution remotely.
- **Stage 2** – SWPS receives and solves the complaint. An internal Grievance Meeting will be organised by SWPS to further the complaint's resolution (see **Appendix 1**).

The Complainant has the right to apply to the Court in case his/her complaint was not resolved through either Stage 1 or Stage 2, or directly without use of the grievance mechanism.

### 6.4. Roles and Responsibilities

As the implementing agency, SWPS has overall responsibility for project implementation and safeguard compliance. The contacts below are responsible for ensuring all Project-related grievances are carried out in accordance with Kazakhstani legislation as well as EBRD's Environmental & Social Policy:

**Name:** Nauryzbek Zhumagazin, *Local Administrative Manager*

**Address:** Zhambyl Region, Sarysu District, Zhanatas City, m.d. 1, Building 2, Apt. 4

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**Fax:** +7 727 355 8833

**Email:** info@saryuwpp.kz

The Contractor Companies will assist with this SEP process by elevating complaints to SWPS for their resolution and resolving Stage 1 complaints where relevant. Any complaints received by a Contractor Company will be noted on site and passed on to SWPS. This will be stipulated via the tender documentation and the Code of Conduct for the Contractor Company.

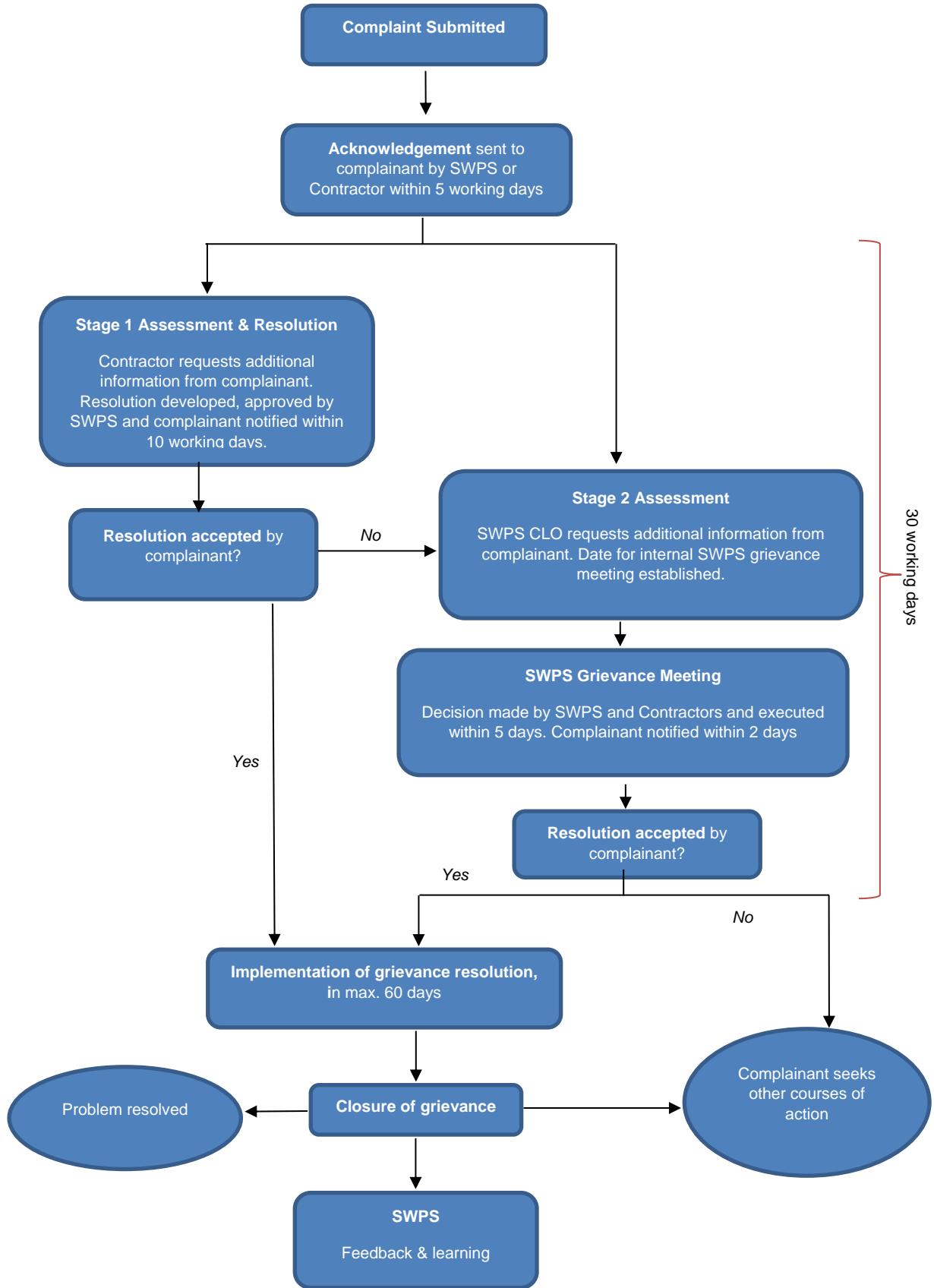
In addition, EBRD's Independent Project Accountability Mechanism 2 (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

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<sup>2</sup> IPAM reporting is available at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

# APPENDIX I – Complaint Procedure and Grievance Form

## Appendix I.1 Grievance Resolution Process Chart



## Appendix I.2 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>	<input type="checkbox"/> I wish to raise my grievance anonymously  <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: <hr/> <hr/> <input type="checkbox"/> By Telephone: <hr/> <input type="checkbox"/> By E-mail: _____
Language  Please mark your preferred language for communication	<input type="checkbox"/> Kazakh <input type="checkbox"/> Russian <input type="checkbox"/> Other
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	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Please return this form to:

**Name:** Nauryzbek Zhumagazin, *Local Administrative Manager*

**Address:** Zhambyl Region, Sarysu District, Zhanatas City, m.d. 1, Building 2, Apt. 4

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