

Ministry of Transport of the Republic of Kazakhstan

JSC National Company "QazAvtoJol"



**RECONSTRUCTION OF
A-27 ATYRAU-DOSSOR HIGHWAY PROJECT
KAZAKHSTAN**

Stakeholder Engagement Plan

(Draft)

October 2025

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ACRONYMS

AIIB	Asian Infrastructure Investment Bank
CAREC	Central Asia Regional Economic Corridor
CLO	Community Liaison Officer
CoR	Committee of Roads
CSC	Construction Supervision Consultant
E&S	Environmental and Social
EA/CR	Executive Agency/Committee for Roads
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESF	Environmental and Social Framework
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental Social Standards
FGD	Focus Group Discussion
GRC	Grievance Redress Committee
GRM	Grievance Redress Committee
IFI	International Financial Institution
KII	Key informant interviews
LMP	Labor Management Plan
MoT	Ministry of transport
NC JSC	National Company Joint Stock Company
NGO	Non-Governmental Organizations
OPEC	Organization of Petroleum Export Countries
PAP	Project Affected People/Persons
PMC	Project management consultant
QAJ	JSC National Company "QazAvtoJol"
RAP	Resettlement Action Plan
RoK	Republic of Kazakhstan
SCS	Construction Supervision Consultant
SEA	State Environmental Appraisal
SEP	Stakeholder Engagement Plan

Stakeholder Engagement Plan

1. Introduction

1.1 Background

Atyrau Region in Kazakhstan, formerly known as Guryev Region until 1991, is one of the 17 regions of Kazakhstan, in the western part of the country around the northeast of the Caspian Sea. Its capital is the city of Atyrau, with a population of 355,117; the region itself has a population of 681,241, of which Kazakhs make up about 90%. It is the second smallest region in Kazakhstan area of 118,600 square kilometers. It borders Russia (Astrakhan Oblast) to the west; fellow Kazakh regions Aktobe to the east; Mangystau to the south; and the West Kazakhstan Region to the north. The Ural River is the border between Asia and Europe and flows from Russia to the Caspian Sea through the region. Atyrau (together with Aktau) is Kazakhstan's main Harbor City on the Caspian Sea, Atyrau at the delta of the Ural River. Atyrau city is approximately 20 meters (66 feet) below sea level. The city is considered to be located both in Asia and Europe, as it is divided by the Ural River. The city is a hub for the oil-rich Caspian Depression; because of this, many oil wells have been drilled in the Tengiz Field and Kashagan Field areas. An oil pipeline runs from Atyrau to Samara, where it joins the Russian pipeline system.¹

The Atyrau region, also known as Kazakhstan's oil capital, is a vital industrial hub where the oil and gas sector dominate the economy, as it accounts for 88% of total industrial output. Despite its economic importance and rapid development, the region faces significant transportation challenges, particularly in road infrastructure. Only 41.9% of the 1,117.6 km of republican roads are currently in good condition. The Atyrau-Dossor, (a town in the Makat District of the region) highway, a key transport artery critical to supporting the growing traffic from the National Industrial Petrochemical Technopark (FEZ NINT) is in urgent need of reconstruction.

1.2 Project Context --Atyrau-Dossor Road

The **Atyrau–Dossor Road**² in Kazakhstan plays a vital role in the country's transportation and economic infrastructure. Here's why it's considered important:

(i) **Strategic Connectivity**

- It links **Atyrau**, a major oil-producing city, with **Dossor**, a key junction town that connects to other highways like the A33.
- This road forms part of broader routes that connect **Western Kazakhstan** to the **Caspian Sea port of Aktau**, facilitating trade and logistics.

(ii) **National Development Priority**

¹ [Uzen-Atyrau-Samara Oil Pipeline](#), Institute of Oil Transportation, accessed October 2017; [Uzen-Atyrau-Samara Oil Pipeline Report | Wood Mackenzie](#)

² A27 highway (Kazakhstan) Technical assistance grant to prepare ESIA for the Reconstruction of the A-27 "Atyrau-Dossor" Highway Project in the Republic of Kazakhstan - OPEC Fund for International Development.

- The Atyrau–Dossor segment is included in Kazakhstan’s **2025 national road reconstruction plan**, which aims to upgrade over 13,000 km of roads across the country.³
- Its reconstruction is prioritized to improve **regional mobility**, reduce travel time, and support economic growth.

(iii) **Economic Significance**

- The road supports the **oil and gas industry**, which is central to Kazakhstan’s economy, by enabling efficient transport of equipment, personnel, and resources.
- It also boosts **local commerce** by connecting smaller towns to major urban centers and trade routes.

(iv) **International Relevance**

- As part of the **E40 European route**, it contributes to **transcontinental connectivity**, linking Europe with Central Asia.
- It’s a key segment in the **Center West Regional Development Corridor**, supported by international partners.

Thus, Atyrau–Dossor Road is a lifeline for regional development, international trade, and strategic mobility. In this context, this project aims to upgrade 86 km of the A-27 "Atyrau-Dossor" road to category I standards, directly aligning with President Tokayev's directives and multiple national development programs. Improving this transport infrastructure shall contribute to the expansion of trade and competitiveness of the region, increasing employment, reducing the cost of production and distributing products. Thus, the reconstruction of the Atyrau-Dossor highway is perceived as a stimulus for economic growth and will contribute to the economic development of border regions, urban and rural settlements.

1.3 Project Information

The Roads Committee under the Government of the Republic of Kazakhstan, with financing from Asian Infrastructure Investment Bank (AIIB), is implementing the Reconstruction of A-27 Highway Atyrau-Dossor km 598-512 Section Project. A key component of this project includes reconstruction and upgrading (from 2- to 4- lanes) of an 86 km road section between the city of Atyrau and Dossor. The project scope includes the expansion and construction of dual carriageway with Category I-b, including approximately 152 culverts, 22 cattle underpasses, 4 bridges, 2 overpasses, 16 agricultural machinery overpasses, 1 interchange and 2 rest areas. The main goal of this investment project is to create a road infrastructure capable of meeting the needs of the economy and the population in high-quality and safe road transportation. A feasibility study based on preliminary road outline and EIA (as per the national requirements) has been prepared by Kazakhstan. Further, recognizing the need to ensure the environmental and social sustainability of the project interventions, an Environmental and Social Impact Assessment (ESIA) is undertaken. This assessment is to not only comply with the national laws and regulations of the Republic of Kazakhstan but also the environmental and social standards of the AIIB. In this context, AIIB enlisted two individual consultants to support Kazakhstan/

³ [Construction of 13 thousand km of motorways planned in Kazakhstan - Official Information Source of the Prime minister of the Republic of Kazakhstan](#)

QAJ (the client) to prepare a comprehensive ESIA package,⁴ and relevant Environmental and Social instruments. One such standard relates to Stakeholder Engagement (SE) and Information Disclosure (ID) and the instrument is Stakeholder Engagement Plan (SEP) which ensures: (i) enhancing project acceptance; (ii) contributes to the design and implementation of the project; and (iii) environmental and social sustainability of the project. Further deliberations are premised on this characterization: a stakeholder is either an individual or group of individuals with a common entity or an organization who/ which can either influence / impact on the project or be impacted by the project.

1.4. Objectives of the SEP

The Government of Kazakhstan (ROK) recognizes that there are many stakeholders, both institutional and individual, as related to the road sector, in general, and this project, in particular. Stakeholders are quite heterogeneous and their expectations and orientation as well as capacity to interface with the project vary. Such a diversified group of stakeholders necessitates systematic efforts to develop a Plan - Stakeholder Engagement Plan (SEP) - to identify all the different stakeholder groups/ sub-groups, design an approach for reaching each of them, hold consultations, and ensure public disclosure of the deliberations. Specific purposes are as follows:

- a. To establish a systematic approach for identification of stakeholders and to build and maintain a constructive relationship with them, in particular project-affected parties thus ensuring gain their trust and legitimacy which paves the way for sustainability
- b. To assess the level of stakeholder interest and support for the project and to enable stakeholders' views to be considered in project design and environmental and social performance
- c. To reduce risks in implementation as it helps in identifying land disputes (if any), cultural sensitivities, labor concerns, and environmental risks—before they assume huge proportions
- d. To promote and provide means of effective and inclusive engagement with project-affected parties throughout the project life cycle on issues that could potentially affect them. Provides a platform for the poor and vulnerable sections, including women, to participate in the project
- e. To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format
- f. To provide project-affected parties with accessible and inclusive means to raise issues and grievance and allow the project to respond to and address such grievances.

1.5. Scope and Structure of the SEP

The SEP will be planned as an integral part of the project's environmental and social assessment and project design and implementation. This report has 12 chapters. This chapter viz., Chapter 1 served as Introduction. Chapter 2 presents the regulatory framework of Kazakhstan which provides the legal basis for SEP. A comparison between Kazakhstan legislation and that of AIB/ GIIP is made and a Gap Analysis is conducted in Chapter 3. Chapter 4 depicts the previous consultations held in the context of constructing this road. Chapter 5 lays out the stakeholder identification and analysis as relevant to the Project. Chapter 6 focuses on Vulnerable sections. Stakeholder Engagement Plan and Disclosures are discussed in Chapter 7. Institutional and implementation arrangements for effecting the SEP are presented. Monitoring, documentation, and reporting arrangements are presented in

⁴ [Approval tender — Technical assistance grants to prepare ESIA for the Reconstruction of the A-27 "Atyrau-Dossor" Highway Project in the Republic of Kazakhstan — for Kazakhstan by OFID in Roads & Bridges, Civil Engineering sectors — Development Aid](#)

Chapter 9. Grievance Redressal Mechanism and Grievance Redress Committees are discussed in Chapter 10 and 11. Chapter 12 deals with SEP performance monitoring.

2. The Republic of Kazakhstan legislation and AIIB/ GIIP Requirements on Stakeholder Engagement

The RoK legislation mandates that the public should be informed about any Project and provide an opportunity to comment on the information provided to it during the development / discussion of the Project. This broad principle is enshrined in the mandatory Environmental and Social Impact Assessments (ESIA), primarily governed by environmental legislation, with focus on public participation, transparency, and accountability. The Environmental Code of 2021 Environmental Code serves as the key legislative basis for SE. The table below (**Table 1**) summarizes such legal provisions as well as the international treaty signed and the protocols and practices.

Table 1: Kazakhstan Legislation, Protocols and Practices

Law / Code/ Treaty/ Practice.	Relevance to Stakeholder Engagement
Environmental Code (2021)	<p>The Code mandates public hearings as part of the ESIA providing for participation of stakeholders, including local communities, non-governmental organizations (NGOs), and other interested parties. These hearings are typically held in regions where the project will have an impact.</p> <p>Towards transparency and access, the project developers are to make information available to the public, such as environmental impact reports, risk assessments, and proposed mitigation measures.</p> <p>Stakeholders must be consulted early in project, consider their issues and concerns and provide a feedback on how they are/ will be addressed.</p>
Land Code (2003)	Mandates notification and consultation with landowners and users during land acquisition or resettlement.
Labor Code	Provides for considering laborers as one of the key stakeholders and to hold consultations with them.
Law on Local Self-Government (2001)	Empowers local Akimats to facilitate community consultations and grievance handling.
The Law on Access to Information (2015)	Ensures public access to environmental information and establishes the right of citizens to obtain information related to environmental impacts.
Law on Access to Environmental Information (2007)	Guarantees public access to environmental data and project-related documents.

Law / Code/ Treaty/ Practice.	Relevance to Stakeholder Engagement
Law on Public Councils (2015)	Establishes mechanisms for civil society participation in decision-making, especially in infrastructure and social projects.
International Treaty Signatory	UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).
Sectoral Guidelines and Practice	Committee of Roads and QazAvtoZhol often follow internal protocols for public disclosure and consultation.

3. Gap Analysis

The distinguishing characteristics of a GIIP founded SEP includes the following:

- a. Stakeholder Mapping: is a process of identifying and categorizing the various individuals or groups who:
 - i. are affected or likely to be affected (directly or indirectly) by the project (affected parties) or
 - ii. may have an interest in the project (other interested parties), including individuals and groups that may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status, and those with differing interests within the identified groups (e.g. by gender, ethnicity, or age)
- b. Develop and implement a SEP appropriate to the nature and scale of the risks, impacts and development stage of the project, and conduct stakeholder engagement ensuring access to timely, relevant, understandable, and accessible information. The Client will provide stakeholders with timely, relevant, understandable and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- c. Disclose relevant project information that helps affected communities and stakeholders understand the risks, impacts and opportunities of the project, provide access to information for affected communities, in the local language, and in a manner that is accessible and culturally appropriate for all groups. The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received, and a brief explanation of how the feedback was considered, or the reasons why it was not.
- d. Conduct consultation that is meaningful, i.e. it is a two-way process that is inclusive and culturally appropriate, allowing representation of the views and specific needs of various groups identified in the SEP. Engage with and report to stakeholders on an ongoing basis throughout the project cycle. Establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled, and resolved effectively, in a prompt and timely manner.

Given these characteristics, major gaps relate to limited engagement with stakeholders, deficient inclusion (specially women and vulnerable), weak grievance redressals, inadequate disclosures, and lack of unitary command (overlapping roles and responsibility across different agencies) rendering coordination difficult. Key gaps between Kazakhstan Laws and that of AIIB & GIIP are presented in **Table 2** below.

Table 2: Gap Analysis

AIIB/ GIIP	RoK	Measures to address the gaps
TIMING AND NATURE OF STAKEHOLDERS ENGAGEMENT		
Stakeholder engagement is an inclusive process which is most effective when initiated at an early stage of the project development process, and is an integral part of early project decisions and the assessment, management and monitoring of the project's environmental and social risks and impacts	Engagement occurs primarily during the EIA process, with emphasis on public hearings before project approval.	Extend the stakeholder engagement process beyond the EIA stage to cover the entire project lifecycle.
Engagement is required throughout the project lifecycle, starting as early as possible and continuing throughout the project stages.	Kazakhstan may not require ongoing engagement after the EIA stage.	Project to provide ongoing consultation with stakeholders, particularly those affected by the project, and the interested public at all stages of the project.
The Borrower will identify those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable.	Limited requirements to identify and assist vulnerable groups. Social allowances are envisaged for households below the poverty line, large families having four or more children below 18 years of age, households with members with disability.	Development of targeted measures so that adverse impacts do not fall disproportionately on vulnerable households, and they are not disadvantaged in sharing the benefits and opportunities resulting from the project. Tailored/differentiated engagement with vulnerable groups.
MEANINGFUL CONSULTATIONS		

<p>The Bank emphasizes meaningful consultations that are free of manipulation and other negative influences and require culturally appropriate methods</p>	<p>National legislation mandates public hearings and access to information, ensuring that stakeholders can express their opinions.</p> <p>Kazakhstan's legislation may not explicitly address the need for a influence-free environment or specify culturally appropriate consultation methods.</p> <p>The 30-day public consultation is to start when the detailed design is completed and sent for the State Technical Review 1.</p>	<p>Project to ensure that consultations are conducted in a manner that is free of manipulation and coercion and is culturally sensitive.</p> <p>Project to ensure that consultations are free, transparent and culturally appropriate.</p> <p>Information disclosures in a timely, understandable, accessible and appropriate manner and format.</p>
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	<p>Notice is to be published in at least one newspaper circulated on the project affected territory in Kazakh and Russian languages with the 1) domain address of the detailed design Environmental Protection Chapter 2) contact phone and 3) time and place of the public meeting that ends the consultation.</p> <p>If a web meeting is arranged, the note shall include the link to this meeting. The district or city council is to define the time and place of the meeting and conduct it. No stakeholders are invited in person. The public meeting minutes and public notes are submitted to the State Technical Expertise before the approval of the detailed design. It checks adherence to the consultation procedures and takes the meeting decision into consideration. The negative decision of the meeting, however, does not have prohibitive power.</p>	
PROCESS OF STAKEHOLDERS ENGAGEMENT		

<p>The Bank specifies a detailed process including stakeholder identification and analysis, planning, disclosure, consultation, grievance redress, and reporting.</p> <p>Establish an effective grievance mechanism, inform the affected communities and ensure that the mechanism addresses concerns promptly and transparently, in a culturally appropriate manner, and is readily accessible to all stakeholders.</p>	<p>The legislation outlines a process involving public notification, stakeholder identification, and public hearings, but does not explicitly mention grievance mechanisms. The process may not be as thorough as the Bank's, particularly regarding grievance redress and ongoing reporting.</p> <p>Grievances must be recorded by the Company and answered within 3 working days if directed incorrectly, within 15 days if no additional information is required and within 30 days if it is required. Anonymous complaints and complaints without clear statements of the matter (object, motives, demands) does not have to be reviewed.</p>	<p>Project to develop and implement a robust grievance redress mechanism that allows stakeholders to raise concerns and receive responses throughout the project.</p> <p>Effective, inclusive engagement and grievance management, free of retaliation to be established</p> <p>GRM should be accessible and inclusive means to raise issues and grievances.</p> <p>Any and all grievances aired, in any form should be duly enquired and decided to consider or otherwise.</p>
DOCUMENTATION AND DISCLOSURE		
<p>Borrowers must maintain and disclose a record of stakeholder engagement, including feedback received and how it was addressed throughout the project.</p>	<p>There is a requirement for public access to information and for documentation of the public hearings process, but continuous documentation throughout the project is not explicitly mentioned. The national practice may not require detailed documentation and disclosure throughout the project lifecycle. AIIB requires also NTS disclosure in local languages. Cat A project requires 60 days and Cat B - 30 calendar day prior financing approval disclosure</p>	<p>Project to enhance documentation and disclosure requirements to include detailed records of all stages of stakeholder engagement and how feedback has been incorporated into project design and implementation.</p> <p>Establish a system for reporting back to stakeholders</p>

Taking due cognizance of the Bank standards, and making a few adjustments, Kazakhstan would not only meet the requirements of international financiers but also improve the overall sustainability and social acceptance.

4. Previous Stakeholders Consultations

The national highway designated A17 runs through the heart of the country, from the southwest to the northeast. It connects the cities of Kyzylorda, Jezkazgan, Karagandy, and Pavlodar and, over much of its length, provides a critical road component for the Middle Corridor. As the only east-west route across Karagandy and Ulytau oblasts, the road is also vital for the population's access to the rest of the country and economic development. The Atyrau-Dossor project, being a part of Central Asia Regional Economic Cooperation Corridors, serves not only the strategic objective but also a national priority. In this context, a number of road projects and related activities have been undertaken by several international agencies such as World Bank, EBRD, OPEC etc. Following which, Kazakhstan has conducted several stakeholder consultations in the past 4-5 years. So, all these assume significance not only because of geographical proximity but also because institutional and implementation arrangements are more or less the same. As the consultations are a continuous activity, to be performed during the entire project cycle, these provide insights for further planning. For the project being financed by AIIB, three consultations have been held during 2024, besides various consultations conducted during the preparation of the Feasibility Study. The project specific consultations are presented in Annex 1. While the details related to consultations conducted by other projects are presented in Annex 2, a summary of the proceedings of all the consultations follow hereunder.

Overall, all the stakeholders welcome the project as it is bound to benefit all of them in the long run. However, the consultations raised issues and sought answers related to the following:

1. Project Timeline: When is the start date of construction, duration of the road construction and dimensions/ specifications of the planned road?
2. Ease in local usage/ Security: Will there be supplementary paths for local transport with sufficient lighting; Public Transport points; Exit roads, U-turns, over/ under pass and safety of human beings and cattle – during the road crossing.
3. Cultural heritage such as pilgrimages: how are they managed?
4. Location and management of Burrow Pits.
5. Employment for local laborers: will the local people get employment in project work?
6. Transportation / traffic on the existing roads while the same being expanded: will it continue; if so, how?
7. Post construction maintenance and toll arrangements: will the local inhabitants have to pay?
8. Land acquisition and resettlement: Who will have to forego lands and how will they be compensated – how this information is made known the affected persons, in particular, and wider public, in general? How power lines will be managed? will they change – implications for power and energy for local usage. Complaint handling mechanisms? Communication channel with the local authorities?
9. Dust, noise and associated health problems: how will these be managed?

The above list of questions/ issues will inform the project of the approach of the engagement as well as the materials for public outreach, particularly at the early stage of the project preparation and implementation. According to the results of the public consultations, the project has in-principle acceptance from the stakeholders. There were no serious issues/ objections, and the minutes have signatures of all the participants of the hearings.

5. Stakeholders Identification, Segmentation and Analysis

5.1 Project Affected and Other Stakeholders.

Key stakeholders who are to be informed and consulted about the Project are generally categorized into:

- a) Affected or likely to be affected by the project (Affected parties)- called project-affected parties (PAP); and
- b) Those who may have an interest in the project (Other interested parties).

These are broad categories normally resorted to by development financial institutions. However, there are two other approaches for identification/ segmentation- one, based on the Impact Zone (individuals and/ or areas / spots subject to be impacted), and the other Level of Influence (the extend of socio-economic endowment) and their Interest in Outcomes. The segmentation helps in designing the outreach strategies.

5.2 Stakeholders Based on Impact Zone

Table 3: Stakeholders categorized on the nature and type of impacts

Impact Zone	Stakeholder Group	Interests	Engagement Strategy
Settlement(s)	Local residents, informal settlers, elders	Land acquisition, noise, access, compensation	Household surveys, public meetings, grievance desks
	Local government (Atyrau, Dossor)	Service continuity, urban planning	Coordination meetings, formal notifications
Industries	KPI, SEZ operators, logistics firms	Access roads, supply chain disruption, labor standards	Joint planning sessions, compliance briefings
	Private Manufacturing Businesses		
	Workers and contractors	Working conditions, transport, safety	Toolbox talks, labor audits, anonymous feedback channels
Environmental Areas	Environmental NGOs, ecologists	Biodiversity, water runoff, pollution	Technical consultations, EIA disclosure
	Ministry of Ecology and Natural Resources	Regulatory compliance	Permit reviews, site inspections
Transport Nodes	Freight operators, railway authorities	Traffic flow, junction safety, downtime	Traffic impact assessments, coordination workshops
	Road maintenance agencies	Long-term upkeep, design input	Technical review sessions
Labor & Workforce	Camp managers, labor unions	Worker welfare, housing, grievance mechanisms	Monitoring visits, labor rights training

Impact Zone	Stakeholder Group	Interests	Engagement Strategy
Community Safety	Nearby communities	Social tensions, service strain	Community liaison officers, joint forums
Community Interface Zones	School staff, clinic managers, religious leaders	Safety, access, disruption to services	Targeted outreach, alternate access planning
Social Safety	Vulnerable groups (disabled, elderly)	Mobility, information access, targeted assistance	Inclusive consultations, translated materials

5.3 Stakeholder Influence – Interest Overlay

Each stakeholder group has certain influence on the project depending on the impacts likely to occur. However, their interest/ endowment (socio-economic standing) varies substantially across the groups. The project has to consider both these – influence and interest- in designing a strategy to engage with each one of them. The same is depicted, as an illustration, in the table below.

Table 4: Stakeholders based on the nature and extent of impacts.

Quadrant	Description	Engagement Strategy	Examples
High Influence / High Interest	Key decision-makers and affected parties	Intensive consultation, co-design, regular updates	Local government, landowners, businesses, KazAvtoZhol
High Influence / Low Interest	Powerful but disengaged actors	Strategic briefings, targeted outreach	National ministries, Other DFIs
Low Influence / High Interest	Socially and Economically Disadvantaged	Inclusive consultation, grievance access, empowerment	Local residents, informal workers, NGOs, women and vulnerable.
Low Influence / Low Interest	Other interested stakeholders	Monitoring emerging concerns	Distant communities, general public, NGOs, media and political interest groups.

5.4 Stakeholder Analysis

Stakeholder Analysis is carried out combining the second and third categorization into the first and generally followed approach. Issues and concerns specific to a particular group and sub-groups form the basis for deciding upon communication and engagement methods.⁵

⁵ Aktoke Regional Roads, Kazakhstan, Stakeholder Engagement Plan, December 2024. EBRD Financed.

Table 5: Stakeholder Analysis

Identified Stakeholders	Specific issues & Concerns	Communication and engagement methods
Project Affected Parties (People, Businesses, Organizations)		
<p>PAPs whose property will be affected by the project activities:</p> <ul style="list-style-type: none"> • Living/operating within the project footprint • Living/operating outside of the project footprint. <p>People/Companies whose livelihood will be directly affected with land acquisition.</p> <p>Oil Companies (Embamunaigas, Dossormunai), example.</p> <p>People/companies who lease land from the government and to private individuals and whose livelihood might be affected.</p>	<ul style="list-style-type: none"> • Information on land acquisition and resettlement and the associated relevant local authorities. • Adequate and timely compensation for the acquisition of/or damage to property (Land, Crops, Trees and objects). • Potential health issues related to project. • Disruption of daily routine and paths of movement of people. • Compensation for adverse effects to livelihoods. 	<ul style="list-style-type: none"> • Communication during the process of land acquisition and/or resettlement, within the possibilities • Online presentation materials • Media/press releases • Online social media (Facebook, YouTube, Instagram, others), Official website, Telegram, WhatsApp & other • Telephone calls • Direct email communication • Consultation and coordination meetings with physical presence and Online • Public announcement on visible public locations along the alignment (stores, schools, markets, bulletin boards outdoor and indoor local government/ KAZ premises)
<p>Local residents living next to the project footprint or in the project area of influence and are not affected by the expropriation but are experiencing the effects of Project related construction and operation activities (Farmers that keep livestock, disrupted paths of movement of farmers to reach their fields, students traveling towards settlements where they study,</p>	<ul style="list-style-type: none"> • Providing timely information on risks and disturbances associated with the construction and operation period. • Public safety during construction and during operations. • Health issues related to project. 	<ul style="list-style-type: none"> • Online social media (Facebook, YouTube, Instagram), Official website, Telegram, WhatsApp & other. • Media / press releases. • Periodic reporting • Disclosing information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board(s) of the affected settlements
<p>national and international drivers and passengers, cemetery visitors, private individual transporters commuting through the area, etc).</p>	<ul style="list-style-type: none"> • Disruption of daily routine and paths of movement of people. • Interest in potential employment or service–providing opportunities during construction and operations. 	<ul style="list-style-type: none"> • Consultation and coordination meetings with online and physical presence.
<p>Vulnerable Groups (women, elderly, disabled).</p> <p>Informal Land Users (e.g., roadside vendors</p>	<ul style="list-style-type: none"> • May face adverse disproportionate impacts from displacement or access loss, and other project disturbances 	<p>Inclusive forums, mobile outreach, targeted support during all phases.</p> <ul style="list-style-type: none"> • Socio-economic survey, legal aid, transitional support

<ul style="list-style-type: none"> • Councils and Maslikhats (Local parliament). • Don village council • Public and private communal enterprises operating in each of the affected districts, responsible for wastewater treatment, waste collection, <p>Local Akimats (Makat District, Dossor)</p>	<ul style="list-style-type: none"> • Area economic development, employment, workers and businesses skills enhancement, funds for utilities and infrastructure improvement • Successful realization of the project with minimal adverse environmental or social impacts. • Minimizing the economic damages. • Disruption of daily routine and paths of movement of people and businesses during construction and operation. • Effects on agricultural and farming activities and affected people's livelihood. • Providing timely information on risks and disturbances associated with the construction and operation period. • Establishing cooperation with stakeholders. 	<ul style="list-style-type: none"> • Face to face and online consultation and coordination meetings • Joint resolution of received by the council's complaints • Employment plans submission <p>Official correspondence</p>
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Identified Stakeholders	Specific issues & Concerns	Communication and engagement methods
Other Interested Parties		
General public in the project affected areas,	<ul style="list-style-type: none"> • Presence of Project related construction activities. • Project benefits and risks like limitation of access to the road and damages to the adjacent roads and streets 	<ul style="list-style-type: none"> • Online presentation materials. • Media/press releases • Online & social media (Facebook, YouTube, Instagram, others), Official website, Telegram, WhatsApp & other. • Public consultation meetings as appropriate.
Transit road users	<ul style="list-style-type: none"> • Road use restrictions and detours 	<ul style="list-style-type: none"> • Information on Yandex Maps • Online presentation materials. • Media/press releases. • Online social media (Facebook, YouTube, Instagram, others), Official website, Telegram, WhatsApp & other.
Relevant governmental authorities, ministries, and public institutions, including: <ul style="list-style-type: none"> • Ministry of Labor and Social Protection of Population • Ministry of Transport • Ministry of Agriculture • Ministry of Healthcare • Ministry of Industry and Construction • Ministry of Tourism and Sports • Ministry of National Economy Ministry of Trade and Integration 	<ul style="list-style-type: none"> • Consultations with relevant governmental authorities concerning Project activities in the framework of permitting procedures. • Reporting based on national legislation requirements. • Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation. • Consultations and information to be shared with governmental agencies that might have an interest in project realization (directly or indirectly affects their operations). 	<ul style="list-style-type: none"> • Correspondence EOtinish.kz • Consultation and coordination meetings with physical presence and Online • Individual and Public consultation meetings
Relevant authorities and public institutions responsible for care of protected areas, locations and objects, including: <ul style="list-style-type: none"> • Ministry of Ecology and Natural Resources • Ministry of Culture and Information and others 	<ul style="list-style-type: none"> • Consultations relevant to protected sites, areas and objects • Implementation of measures of protection if these are affected by the project • Cultural and historical significance of the locations and objects • Biological significance of the locations, area and objects 	<ul style="list-style-type: none"> • Consultation and coordination meetings with online and physical presence. • Public consultation meetings. • Direct email communication • Official correspondence
Religious groups	<ul style="list-style-type: none"> • Presence of burial memorials and cemeteries next to the road, and within footprint. 	<ul style="list-style-type: none"> • Media/ press releases • Online social media (Facebook, YouTube, Instagram), Official website, Telegram, WhatsApp & other. • Direct communication

Identified Stakeholders	Specific issues & Concerns	Communication and engagement methods
<p>Interested non-governmental and Civil Society organizations (NGOs and CSOs) :</p> <ul style="list-style-type: none"> • Council of Peace and Concord regional branch • International Ecological Association Women of the East regional branch • Public Associations • Public Fund 'Empro' • Regional society of hunters and fishermen. • Plants protection regional society 	<ul style="list-style-type: none"> • Stakeholders who are interested in protection of the environment and biodiversity, and residents' health and welfare. 	<ul style="list-style-type: none"> • Individual consultation meetings as necessary • Public consultation meetings, where possible • Direct email communication • Media/ press releases • Online social media (Facebook, YouTube, Instagram), Official website, Telegram, WhatsApp & other.
<p>Beneficiary's employees (and PIU), and relevant Trade Union/s</p>	<ul style="list-style-type: none"> • Stakeholders directly or indirectly engaged in Project planning and implementation. • Successful realization of the project's aims and objectives. • Providing timely information about the planned Project activities to the relevant stakeholders. 	<ul style="list-style-type: none"> • QAJ internal communication channels. • Trainings as necessary.
<p>Contractors or subcontractors during construction (and operation), monitoring and supervision of works, and their employees, and maintenance related workers. Suppliers.</p>	<ul style="list-style-type: none"> • Stakeholders of high significance for the Project's success who are directly or indirectly engaged in Project planning, implementation, and infrastructure maintenance. • Provision of Project code of conduct and work safety and health regulations, environmental protection requirements. 	<ul style="list-style-type: none"> • Information through tender procedure and contracts. • Communication via supervising engineers. • Toolbox talks at construction sites on health and safety topics. • Monthly reports on progress of works to be submitted by contractors during construction work. • Trainings • Email communication.
<p>Businesses:</p> <ul style="list-style-type: none"> • Trade and Retail, • Transport domain, • Tourism domain, • Agriculture domain. • Investors 	<ul style="list-style-type: none"> • Involvement in development of project activities suitable to their needs and capacities. • Informed businesses who will need to adjust their investments and operations to 	<ul style="list-style-type: none"> • Individual consultation meetings as necessary. • Public consultation meetings, if possible. • Direct email communication • Media/press releases.

Identified Stakeholders	Specific issues & Concerns	Communication and engagement methods
<ul style="list-style-type: none"> other private sector stakeholders 	the planned activities and outcomes of the project.	<ul style="list-style-type: none"> Early warning on planned changes in the used services
Donors and Other International and Supranational Organizations: <ul style="list-style-type: none"> The European Union European Bank for Reconstruction and Development OPEC Other 	<ul style="list-style-type: none"> Interest in ensuring the Project meets its objectives, technically and financially, and does so in a manner that meets international environmental and social standards. Realization of addressed support and finances 	<ul style="list-style-type: none"> Direct email communication. Media/ press releases. Online social media (Facebook, YouTube, Instagram), Official website, Telegram, WhatsApp & other. Public consultation meetings, if possible.
International NGOs that monitor the environmental and social performance of donors	Their interests are to see that international standards are followed, and they will place great efforts to diligently monitor the project implementation	<ul style="list-style-type: none"> Online presentation materials Media/press releases Online social media (Facebook, YouTube, Instagram), Official website, Telegram, WhatsApp & other Direct email communication
Media (print and AV) as well as the general national public.	Up to date information flow	Any/ all means.

6. Disadvantaged/ Vulnerable

Disadvantaged or vulnerable refers to those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/or assistance to do so. This will consider aspects relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon which they depend.

In the context of SEP, the following groups are generally found to be at risk or considered as disadvantaged and vulnerable: women, especially women engaged in seasonal work, female-headed households and women farmers who by virtue of the prevailing, limiting social norms and social networks may find it harder to obtain information about the benefits of the project and to voice any concerns or issues they may want to raise; poor households; households involving persons with disability or ethnic and linguistic minority groups; as well as people without formal title to the lands occupied or using.

For this project, the following categories have been identified as 'Vulnerable' within the project area:

- a) Families and individuals living below the poverty line (but not recognized or having not requested any type of social allowances)
- b) Families and individuals who receive Targeted Social Aid (TSA)⁶ allowance or other types of allowances such as for disability
- c) People with disability and individuals with chronic illnesses;
- d) Illegal households or individuals with no legal rights to their land or non-land assets
- e) Women headed households
- f) Large families with four or more children under the age of 18
- g) Seasonal and migrant workers
- h) Individuals with low levels of literacy
- i) Ethnic minorities (e.g., Oralman communities)

⁶ Kazakh citizens, Kandas¹, refugees, foreigners, and stateless persons who reside in the country and whose average per capita income does not exceed the poverty line are eligible to receive Targeted Social Assistance. The poverty line itself is correlated with the minimum subsistence level (MSL) and is approximately 70% of it. But its size is specified quarterly in each region and published in the media. In the country's budget for 2024, the subsistence minimum is 43,407 tenge (USD90), and the poverty line is set depending on the economic capacity of the state.

Based on past experiences, it is highly probable that the project would exacerbate the vulnerability of those who were already vulnerable. However, if the project is to acquire land from the vulnerable, special efforts should be made to ensure effective consultations and appropriate mitigatory assistance. One of the measures could be arranging transport for the vulnerable to participate in the consultation meetings. If need be, interpreter assistance can also be arranged. Focus groups dedicated specifically to vulnerable groups may also be envisaged as appropriate. As appropriate, ethnic and linguistic minorities could be reached out in a language they feel at home. Towards ensuring gender balance, the project will undertake separate consultations with women and consider their feedback, questions, and concerns. Community liaison officers will identify, map, and ensure tailored outreach to women, disabled, socially or spatially isolated communities to ensure that they are aware and able to participate in project-related activities.

7. Stakeholder Engagement and Disclosure Plan

This document covers the design and preconstruction phase, until the selection of Contractors. Once the contractors are selected, SEP shall be updated to reflect the prevailing situation and will propose stakeholder engagement activities during the construction phase.

7.1 Information Disclosure: Design and Pre-Construction Stage

The project's key proponents, the Committee for Roads, will review and arrange for the disclosure/dissemination of the project's environment and social related documents. The target groups for this have been drawn earlier in section. The method of dissemination shall depend upon the 'influence & interest', and the same is discussed earlier. The disclosures will be made in English and one of the local languages, Kazak or Russian. Key documents, among others, shall include the following:

1. Draft and Final ESIA Report – Separate and stand-alone Non-Technical Summary (targeted at general public at large) and the Main Report.
2. Draft and Main Concise Environmental and Social Management Plan (ESMP).
3. Draft and Final Reports of Stakeholder Engagement including Grievance Mechanism.
4. Draft and Final Labor Management Procedures and Occupational Health and Safety Plan (as and when available);
5. Draft and Final Resettlement Policy Framework and Resettlement Plan; and

available for 30 days on the QAJ website in accordance with the national disclosure procedure. During the Disclosure Period, complete copies of a Draft ESIA and other Project Documents, as referred above, will be available in all three languages in Committee for Roads, Central and Regional offices of QAJAutoJol and the offices of the regional and district Akimat.

7.2 Stakeholder Engagement: Design and Pre-Construction Stage

For the Project's purposes QAJ will use different methods of stakeholder engagement to ensure continuous communication with all interested stakeholders, making sure all necessary information is available and easily accessible. The approach and methods of outreach for each stakeholder group are discussed earlier. Two separate public disclosure meetings where ESIA package shall be

promoted and discussion upon shall be conducted in person by all interested individuals and groups/organizations (i.e. affected and interested stakeholders). Meetings are expected to be conducted in January-February 2026, in each of the two affected districts. Supplementary Stakeholder consultations can be planned, one each, focused on impact zones as discussed earlier (Section 5.2).

Relevant institutional stakeholders, public enterprises, affected landowners/users and organizations will be directly invited to these meetings, while general public will be invited through the available media and internet information spots, such as social media, websites of affected municipalities and web information portals.

QAJ will inform all stakeholders about the exact date, time, and venue where and how the presentation will be held, at least seven days in advance (but preferably two weeks), by disclosure through the social media, websites of the QAJ and affected districts, local media (newspapers, online news portals) and the bulletin boards of each of the affected settlements. The announcement of the public meetings will also be posted in the affected and project neighboring settlements, in order to specifically target the local population living in these communities. In addition, NGOs such as Public association Generation-M, Public Fund Empro, Biodiversity Research & Conservation etc. shall be directly contacted and informed of the public disclosure event.

All justified comments and proposals shall be considered and appropriately addressed. The QAJ will publish a summary report on all relevant issues raised, including explanations for inclusion or exclusion of proposals. All available Project information and documents will be disclosed to the public at least 2 weeks in advance of any planned presentation event. If necessary, separate online and individual meetings and direct communication will be held to ensure that the stakeholder engagement is gender balanced and responsive.

In case of extreme weather or other circumstances that may prevent access to the stakeholders, events requiring gatherings / major meetings be conducted either virtually or by using alternative engagement methods. This can be followed by on-site consultations as soon as the weather and any other conditions improve. QAJ will keep track of all engagement activities performed in a Stakeholder Engagement Log, which will include management forms, minutes of meetings and all relevant material used or prepared for the engagement activity (announcements, posters, brochures, presentations, attendees' sheet, pictures, etc.). The Stakeholder Engagement Log must be updated prior to the construction and after, once every three months to include the data related to the stakeholder engagement activities/events (mostly conducted by the Construction contractor/s) held within the reporting (past) quarters.

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table below.

Table 6: Stakeholder Engagement and Disclosures

Sl No	Activity	Target Group	Information/ Topics	Time Frame/ Responsibility	Means of Communication/ Location
Design Stage					
1					
1.1	Disclosure of: – “Project”. - E&S documents	All stakeholders: <ul style="list-style-type: none"> • Project Affected Parties • Other Interested Parties • General National Public 	Project Brief describing objectives, scope and rationale, components, duration and implementation arrangements. Project Contacts at different levels. E&S Summary of impacts, risks and mitigations. E&S Instruments (Draft & Final): ESIA, ESMP, SEP, LMP, RPF, Grievance Mechanism.	As early as possible, no sooner documents are available and approved by the ROK and AIB. MoT CoR NC JSC QAJ	<ul style="list-style-type: none"> • Implementing Agencies Websites. • Hard Copies at Regional / District QAJ offices and Akimat offices. • Project Leaflets, Brochures disseminated across the impact zone groups. • Disclosure workshops-face-to-face-public presentation
All available Project information and documents will be disclosed to the public at least 2 weeks prior to the public presentation.					
1.2	Addressing issues and concerns of the poor and vulnerable.	All stakeholders with focus of attention on those likely to be affected adversely.	<ul style="list-style-type: none"> • Design intervention for Vulnerable, physically challenged and women as well as female headed households. • Gender related issues. • GBV/ SEA/SH related issues. 	QAJ Akimat PIU	<ul style="list-style-type: none"> • Household surveys, and focus group meetings. • Written information (one pagers/flyers) in local language(s). • Details on websites. • GRM Helpline number through display at project locations and on flyers

1.2	<p>Establishment of a grievance mechanism and duly notified.</p> <p>Disclose the contact details of the person(s) responsible for implementing SEP and GM</p>	All Stakeholders	<ul style="list-style-type: none"> A brief about the GM, made available as a standalone document extracted from SEP. Contact details – name, telephone, email, office address etc of the person(s) responsible. 	SEP is finalized, and ESIA disclosure workshops are held.	<p>Implementing Agencies Websites. Hard Copies at Regional / District QJ offices and Akimat offices.</p> <p>Project Leaflets, Brochures disseminated across the impact zone groups.</p>
1.3	Sharing details about the potential land acquisition and access restriction.	Affected stakeholders such as local residents, businesses and industrial houses.	Resettlement Policy Framework describing the socio-economic survey, land valuations, compensations, grievance mechanism etc.	<p>No sooner RPF is approved by ROK and AIIB.</p> <p>CoR NC JSC QAJ Akimats PIU</p>	Face to Face workshops at as many impact sites as possible.
1.3.1		Vulnerable households/ people	Resettlement Policy Framework describing the socio-economic survey, land valuations, compensations, grievance mechanism etc.	<p>No sooner RPF is approved by ROK and AIIB.</p> <p>CoR NC JSC QAJ PIU Akimats</p>	One on one as well as group-based meetings preferably on their home sites.
1.3.2	Public Safety, Disasters and Disruptions- Information sharing and awareness creation.	All stakeholders with focus of attention on those affected – users of the road, in, general, and the residents around.	<p>Accidents and road safety issues during construction.</p> <p>Natural calamities and optional measures.</p> <p>Disruption to services and arrangement during construction and alternatives.</p>	CoR NC JSC QAJ PIU Akimats	<p>Implementing Agencies Websites. Hard Copies at Regional / District KAZ offices and Akimat offices.</p> <p>Project Leaflets, Brochures disseminated across the impact zone groups.</p>
1.4	Media coverage of the Project progress, planned activities, achievements and any relevant E&S happenings.	All stakeholders	<p>Announcements in the newspapers, news channels, magazines about the Project.</p> <p>Press releases.</p> <p>Announcement about the consultations to</p>	<p>At/ after official signing of the project by ROK and AIIB.</p> <p>CoR NC JSC QAJ</p>	

			be held or coverage of those already held.		
1.5	Communication of potential job opportunities and business opportunities	Residents of the regions, service establishments and retail business, small and medium enterprises in the regions	After disclosures are made and project signed, the project designing is about to be firmed up. Potential opportunities – nature and size- likely to be available locally.	As and when the design/ alignment are firmed up and work breakdown structure is known. CoR NC JSC QAJ PIU Akimats	All forums and platforms.
2	Pre-Construction Stage				
2.1	Resettlement Action Plan Prepared and Implementation commenced as scheduled	All those affected by land acquisition and access restrictions / disruptions as enumerated in the RAP.	RPF approved, household surveys completed, compensations and rehabilitation assistances worked out, PAPs fully appraised/ accepted, and implementation begun. Grievance Mechanism established and made functional.	COR NC JSC QAJ PIU Contractor	Face to face meetings, Online notifications, Hard copies at Akimat and Contractor offices.
2.2	Women and Vulnerable Plan	Women including FHHs and those identified as vulnerable in ESIA.	Provisions of eligible entitlements and possible work opportunities for vulnerable drawn and approved, as a part of the RAP. Grievance mechanism process	COR NC JSC QAJ PIU Contractor	Face to face meetings, Online notifications, Hard copies at Akimat and Contractor offices.
2.3	DBM Contractor interface with local stakeholders established.	All stakeholders with focal attention on Residents of the regions, service establishments and retail business, small and medium enterprises in the regions	Inform the stakeholders with the following: labor camps; burrow pits; and muck disposal locations; usage of water etc. Specify measures to: manage air and noise pollution; and disruption to services and alternative arrangement during construction, Labor Grievance mechanism process,	Contractor's Implementation Plan duly approved. Contractor PIU Akimat COR NC JSC QAJ.	Face to face meetings, Online notifications, Hard copies at Akimat and Contractor offices

			Community Safety measures during road, Relocation of CPRs (shrines/handpumps/ driveways/ cemeteries) as appropriate.		
2.4	Notification on the commencement of construction.	Project Affected and Other Interest groups with focus on those who are likely to be affected adversely.	Design/ Alignment and timeline information is fully on the table with maps, charts etc.	Once the Contractor enlistment is completed, and design/ alignment firmed up. Regional Branch offices of QAJ NC JSC and PIU	Official notification directly to the stakeholder groups in the impact zones, and through media.
2.5	Informing the public of safety measures effected.	Users as well as the residents in and around the construction.	Construction WBS on hand with Contractor and his team fully in position.	Regional Branch offices of QAJ NC JSC and PIU Contractor Prior to the commencement of construction.	Public billboards, leaflets, alerts through telephone, television and web sites, media releases, and face to face meetings.
2.6	Holding informative meetings & discussions to present and discuss the Project's OHS impacts, risks and opportunities as well to make the local stakeholders aware of grievance redress principles applied within the Project.	Officials and residents of the main settlements related to the Project area, farmers using the Project site adjacent areas as pastureland, local business	Contractor has prepared a C-ESMP and Informative Module prepared for different topics, such as OHS, GBV and SEA/SH as well as employment opportunities.	Contractor PIU Akimat, QAJ. LMP approved and Contractor's ESMP drawn and discussed	Hard and Soft copies available with briefs on brochure, leaflets etc.
Construction Stage					
1	Inform project's status, progress,	All stakeholders	Summary version of the Monitoring & Evaluation reports	Contractor PIU Akimat,	Project Web Page, Contractor's web page,

	issues and concerns.		<p>prepared as scheduled</p> <p>Details on RAP implementation include compensations/ assistances paid; progress on SEP; public safety, conflicts and disputes, if any.</p> <p>A special note on the progress made on alternative plan meant for women and vulnerable.</p>	<p>QAJ.</p> <p>M& E reports are prepared, approved and disclosed on official websites.</p>	<p>Regional and district offices of client offices and Akimats, and direct mailing, if feasible.</p>
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8. Future Phases of Project

The SEP is a live document and will be updated and refined as needed throughout the lifecycle of the Project. During the updating process, the focus and scope of the SEP shall be reviewed to ensure that the project will address all external changes and at the same time adheres to its own strategy (which itself may change over time). The SEP will remain in the public domain for the entire period of project development and will be updated on a regular basis as the project progresses through its various phases, in order to ensure timely identification of any new stakeholders and interested parties and their involvement in the process of collaboration with the project. The methods of engagement shall also be revised periodically to maintain their effectiveness and relevance to the Project's evolving environment.

Throughout the life of the Project, QAJ, PIU and the Contractor(s) engaged to construct the Project's assets will continue to engage with stakeholders and this Stakeholder Engagement Plan will be updated, as needed. The SEP will be updated prior to commencement of construction; issues raised during the construction process will be documented and a response provided through the mechanisms described in this SEP.

9. Institutional Arrangements

Key institutions and their role and responsibilities are depicted in the following table.

Table 7: Atyrau–Dossor Road Project Institutions

Institution	Role	Accountability To	Key Interactions
Committee of Roads (CoR)	Supervises project execution, enforces quality and warranty compliance	Ministry of Industry & Infrastructure & Transport of the Republic of	QazAvtoZhol, Contractors, Zhollaboratories, IFIs

Institution	Role	Accountability To	Key Interactions
		Kazakhstan	
QazAvtoZhol	Implement projects, manage contracts, coordinates with local authorities	Committee of Roads	Contractors, Local Akimats, Design Institutes, PAPs and Public
Atyrau Regional Branch of JSC "NC "KazAvtoZhol"	Pivotal role in ensuring that infrastructure projects in the Atyrau Region of Kazakhstan meet rigorous standards for safety, compliance, and performance.	QAK Central Office	All key stakeholders at the local level
Project Implementation Unit	Works under the control and guidance of QAZ and assists it in implementation and coordination.	QAJ, in turn to COR	Contractors, Akimats, COR and Public.
Project Management Consultant	Monitoring social and environmental management plans. Participate in consultations. Could serve as a member of the GRC at project and central level.	QAJ and COR	Contractors, Akimats, Public, KAZ and COR
Construction Supervision Consultant	Assist QAJ/ COR/ Akimat in conducting consultations and disclosures as well as GRM.	QAJ and COR	Contractors, Akimats, Public, QAJ and COR
Branch of the Republican State Enterprise under the right of economic management 'National Center for Road Assets Quality' of the Committee of Highways of the Ministry of Transport of the Republic of Kazakhstan in the Atyrau region (NCRQA)	Conducts quality inspections and material testing	Committee of Roads	Contractors, National Center for Quality
Contractors (to be selected)	Execute reconstruction works; must meet prescribed standards.	QazAvtoZhol, indirectly CoR	Zhollaboratories, KazdorNII, Local Akimats
Local Akimat s(Atyrau Oblast, Makat and Dossor districts)⁷	Facilitates land acquisition, community consultation, and grievance handling	Regional Government	QazAvtoZhol, Contractors, Public
OPEC Fund / IFIs	Provide financing and technical assistance	International Oversight	Committee of Roads, QazAvtoZhol
National Center for Quality of Road Assets	Monitors quality and can halt substandard work	Committee of Roads	Zhollaboratories, Contractors
Local Communities, Business, and Industrial houses.	Affected by construction and entitled to consultations and grievance redressal	Themselves Local Oversight	Contractors, QazAvtoJol

⁷ **Grievance Mechanisms:** Local Akimats are frontline actors, but CoR sets the tone for responsiveness and transparency

10. Grievance Redress Mechanism

The project shall develop and make it functional an inclusive and accountable grievance redress mechanism to ensure social justice and fair play. The grievance redress mechanism described hereunder is distinct from the grievance redress mechanism, to be used by the Project's workforce, described in the Labor Management Procedures (LMP). A finer distinction is normally made between Complaint and Grievance.⁸

Complaint: an individual or a group of individuals express dissatisfaction related to an impact caused by a project activity. The client/ operator (or contractor) is expected to address and resolve it. A complaint can be addressed within the ambit of the client/ operator and normally of a less serious nature than a grievance; and

Grievance: it is the prerogative of an individual or group whose livelihood, health and safety, cultural norms and heritage are adversely affected or likely to be affected by a project activity which, if not addressed effectively, and if not addressed, shall cause severe social/ environmental and / or reputational risks endangering sustainability.

A grievance redress mechanism (GRM) is to safeguard project's social and environmental performance by ensuring addressal of issues and concerns aired by the PAPs with no 'costs' to them and without retribution. The grievance redress mechanisms shall cover both complaints and grievances (hereinafter referred to only as 'grievances') as both need to be addressed. The GRM works within existing legal and cultural frameworks, providing an additional opportunity to resolve grievances at the local project level. The client will inform the PAPs about the grievance process in the course of its stakeholder engagement activities and will make available a record of the responses to all the grievances. The system should be such that any/ all PAPs should be able to and can submit their grievances in any form – in person, by phone, text sms, mail, e-mail or via website. The mechanism will also allow for anonymous grievances to be aired. Grievance management procedures including governance structure, as well as time one can expect to wait for acknowledgment, response and resolution, should be made well known as the system is established.

A Grievance may be also submitted to works contractors during the construction phase. The Grievance Leaflet and Form will be available on construction site, in Kazakh and Russian languages, in printed form, and the Leaflet will be also hung on construction site bulletin boards in order to be visible to the public and interested parties. Works contracts will forward all received grievances to the Project's contact person in the PIU.

All grievances will be recorded in a Grievance Registry and acknowledged within 7 working days. The complainant will be informed by PIU about proposed addressal measures and actions taken within 15 working days upon the acknowledgement. In the case that PIU is not able to resolve the issue, or in any cases where action is not required, PIU will provide an explanation and justification to the Complainant and will advise how to proceed further. Towards this, a multi-layer grievance system shall be in place providing for escalation and further appeals. Complainants can seek other, legal, remedies in accordance with Kazakhstan laws and regulations. The project grievance procedure is presented in **Annex 3**. Any grievance related to SEA/SH shall be handled in confidence and addressed through a special window.

KAZ will monitor the way in which grievances are being handled and PIU will keep a full record of the process in the Grievance Registry or Log (**Annex 3**). The Registry will serve as the basis for completion of the Grievance Management Reports and find a place in the quarterly monitoring report.

⁸ [World Bank Document](#)- Himachal Pradesh State Roads Transformation Program, Stakeholder Engagement Program, HIMACHAL PRADESH ROAD & OTHER INFRASTRUCTURE DEVELOPMENT CORPORATION LTD. India, December 2019.

KAZ will publish, and regularly update, all relevant documents and grievance procedures on its website, and will also make available hard copies of Grievance Forms at the local administration offices. This GM does not preclude complainants in seeking other legal remedies in accordance with the legal framework of Republic of Kazakhstan, including formal judicial appeal.

11. Grievance Redress Committees

The QAJ/ project envisages three levels to address the grievances – (i) local/ site level; (ii) regional level at Oblast level; and (iii) Central at the National level. Initially in sections 11.1, 11.2 and 11.3, the generic system available for grievance redressal are discussed. Subsequently, in 11.4, project specific grievance processes and focal points are presented.

11.1 Site Level GRC

For the **Atyrau–Dossor Road reconstruction**, the **Site-Level Grievance Redress Committee (GRC)**⁹ plays a frontline role in managing community concerns and ensuring compliance with social safeguards. The typical composition of this committee is outlined below.

Table 8: Site-Level GRC Composition – Atyrau–Dossor Road

Role	Affiliation / Function
Chairperson	Local Akimat representative (e.g., Deputy Akim or designated official)
Secretary / Grievance Focal	Appointed by the Contractor or Supervision Consultant; manages records and follow-up
Contractor Representative	Site engineer or community liaison officer
PMC representative- PMC/KUP Representative	Social or environmental specialist managing E/S aspects
Construction Supervision Consultant (CSC)- Construction Supervision Consultant (CSC)/Sewage Pumping Station (SPS)	Social or environmental specialist monitoring safeguard compliance
Community Liaison Group Member	Local resident or NGO representative to ensure community voice
KazAvtoZhol Field Engineer	Provides technical input and links to regional oversight

Key Functions of the Site-Level GRC include the following:

- Receive and register grievances from affected persons, workers, or community members.
- Conduct initial review and resolution within a defined timeframe (usually 7–10 days).
- Document proceedings using standardized forms (e.g., grievance registration, resolution minutes).
- Escalate unresolved issues to the Regional-Level GRC.
- Ensure transparency through public notice boards, consultation meetings, and feedback loops.

⁹ [Microsoft Word - GRM_Guideline_eng_18Aug2014.doc](#) GUIDELINE ON GRIEVANCE REDRESS MECHANISM ON ENVIRONMENT AND SOCIAL SAFEGUARDS FOR ROAD SECTOR PROJECTS, Committee of Roads Ministry of Investments and Development Republic of Kazakhstan, 2014.

11.2 Central and Regional GRCs

The Committee on Roads (COR), and JSC NC QAJAutoJol central office and regional branch offices shoulder primary responsibility for ensuring that the GRM is developed and made functional as envisioned. They may seek support by Project Management Consultants and Construction Supervision Consultant (CSC), who shall be involved in managing and overseeing the construction works and other activities related to the investment program. The respective regional, district, and community Akimats, who are legally obligated to carry out tasks linked to resolving complaints, and mediators / non-governmental organizations (NGO), who are involved in supporting the negotiation of grievances, will also part of the grievance redress mechanism (GRM).

The Grievance Redress Mechanism (GRM) for road sector projects implemented by the Committee for Roads consists of two levels of grievances redressing: the Grievance Redress Committee (GRC) at the regional (oblast) and central (Astana) levels. These levels operate in accordance with the Guidelines on Grievance Redress Mechanism on Environment and Social Safeguards in Road Sector Projects, which were approved by the Committee for Roads in August 2014 (GRM Guidelines). The GRC is composed of members who are appointed from CR, akimats, QAJ, CSC, and the Contractors. At both regional and national levels, the GRC is led by senior managers who are responsible for overseeing the entire operations of the GRM and ensuring its efficient and timely execution. Meanwhile, coordinators are accountable for engaging key stakeholders and overseeing the coordination of GRC activities at both regional and central levels.

GRC at the regional level will include:

- a) Representatives of QAJAutoJol's regional branch (deputy director and a safeguards specialist or lawyer)
- b) Consultants' team representatives (E&S specialist and public relations specialist)
- c) Representatives of regional and district akimats (one from each Akimat located in the project area)
- d) Representatives of the CSC (head / deputy head and protective measures specialist/public relations specialist)
- e) Representatives of the Contractors (head / deputy head and E&S specialist / community liaison specialist)

Grievance processing: Any inquiries or complaints that have received clarifications and a decision at the time of submission will be promptly closed. The GRC at the regional level reviews cases that necessitate additional steps. The Regional GRC gathers twice a month meeting and holds special meetings as needed to address specific issues. It promptly reviews and discusses grievances within a period of ten working days and provides recommendations for their resolution to the concerned parties. The regional GRC coordinator offers relevant data to GRC members, compiles meeting minutes and progress reports, and ensures that actions and decisions are accurately recorded.

Provision of feedback: Disputes lodged verbally or in writing shall be promptly acknowledged upon receipt. Complaints received via letter, e-mail, or fax and acknowledged via letter, fax, or e-mail within three working days of receipt by the GRC coordinator at the regional level. If the grievance is unrelated to project activities or impacts resulting from project implementation and therefore cannot be addressed under this GRM Guideline, the complaining party will receive a response specifying which entity (Akimat at the community, district, or oblast level, as applicable) receives the complaint.

The results of any redress for grievances at the regional level will be communicated to the complainant. If the matter is not resolved at the regional level and is instead transferred to the central GRC, the complainant will be formally notified, with the notification specifying the date the case was transferred to the central GRC and the anticipated date of decision-making at the central level.

In the event of an anonymous complaint, a paper response will be posted at the information stand of the respective regional branch of JSC NC QAJAutoJol, along with the relevant Akimat, to ensure that the complainant has easy access to it.

11.2.1 GRC-- Central Level

At the **central level**, the **Grievance Redress Committee (GRC)** is established to oversee and resolve complaints related to road infrastructure projects, especially those funded by international financial institutions (IFIs) like ADB, AIIB, EBRD, or the World Bank. Typically, the committee's composition shall be as outlined below.

Table 9: Central-Level Grievance Redress Committee (GRC) Composition

Member	Affiliation / Role
Chairperson	Senior official from the Committee of Roads (CoR), Ministry of Industry & Infrastructure
Deputy Chairperson	Representative from NC KazAvtoZhol (national road operator)
Legal Advisor	Legal expert from CoR or Ministry ensures compliance with national and IFI standards
Social Specialist	Often seconded from the Project Management Consultant (PMC) or CoR
Environmental Specialist	Ensure environmental aspects of grievances are properly assessed
Representative of Local Akimats	Provides regional context and links to local grievance channels
Civil Society / NGO Representative	Ensures transparency and community voice in the process
Project Contractor Representative	Participates in technical clarifications (non-voting member)
Grievance Coordinator / Secretary	Manage records, meeting minutes, and follow-up actions

Key Functions of the Central GRC include:

- **Review unresolved grievances** escalated from regional or site-level committees.
- **Ensure compliance** with stipulated E&S policies and national grievance procedures.
- **Monitor trends** in complaints to identify systemic issues.
- **Report regularly** to CoR and IFIs on grievance outcomes and corrective actions.

Thus, if the grievances are not resolved amicably at the regional level, this can be escalated to the Central level GRC.

At the central level, the GRC (i) conducts monthly meetings, with the flexibility to schedule ad hoc meetings as required; and (ii) evaluates grievance cases and provides parties with settlement recommendations within a period of twenty working days. The central-level GRC Coordinator is responsible for disseminating pertinent information to GRC members, preparing progress reports and minutes of GRC meetings, and ensuring that actions and decisions are appropriately documented. Also, any individual can submit an electronic appeal to the state authorities on the e-otinish website <https://eotinish.kz/kk>

Provision of Feedback: In the event that grievance has been successfully resolved, the person who complained shall be formally notified of the resolution's outcome. The complaining party will be furnished with relevant details if the grievance remains unresolved by the GRC at the central level. This information will include the specific reasons for the case's unresolved status, along with a recommendation for further resolution through the RoK legal system.

In the event of an anonymous complaint, a paper response will be posted at the information stand of the respective regional branch of JSC NC QAJAutoJol, along with the relevant Akimat, to ensure that the complainant has easy access to it.

11.3 GRM: Legal System

In accordance with RoK legislation, if a resolution cannot be reached following discussion and assistance from regional and central GRCs, or if the complainant remains dissatisfied with the grievance redress system, the case can be moved to the court for resolution. Nonetheless, it should be emphasized that GRC management does not restrict a complainant's initial right to refer the case to court as part of the grievance redress procedure.

11.4 Grievance Handling Mechanism and Grievance Focal Points

Grievance Handling Mechanism

1. The complaint handling procedures within the project are aimed at ensuring an effective and systematic mechanism for the project to respond to requests, feedback, and complaints from affected individuals, other key stakeholders, and the general public. This chapter further provides the details of the complaint handling procedure related to issues of land acquisition and resettlement.

Levels of the complaint review process

2. The Complaint Review Mechanism (CRM) is available to people living or working in areas affected by project activities. Any person who has experienced an impact or is concerned about project activities has the right to participate in the CRM, have easy access to it, and receive assistance in using it. The proposed CRM does not replace public complaint and dispute resolution mechanisms provided by the legal system of the Republic of Kazakhstan but aims to minimize their use as much as possible.

3. Overall responsibility for the timely implementation of the GRM lies with JSC "NC "KazAvtoZhol" and its Atyrau Regional Branch, which are responsible for managing and supervising construction works and other activities within the Project. The Akimat of the city of Atyrau, which is legally authorized to carry out tasks related to complaint handling, and intermediaries/non-governmental organizations (NGOs), which participate in facilitating amicable resolution of complaints, are also included in the GRM.

4. This GRM provides for two levels of complaint resolution for road sector projects implemented under the guidance of JSC "NC "KazAvtoZhol": the Complaint Review Committee (CRC) at the regional level (Atyrau Region) and at the central level (Astana), in accordance with the Guidelines on the grievance mechanism for environmental and social protection measures in road sector projects, approved by the Road Committee in August 2014 (GRM Guidelines). The CRC presented in this

section has been prepared in accordance with the aforementioned Guidelines but has been adjusted to suit the specifics of the Project. The CRC includes members nominated by JSC "NC "KazAvtoZhol" and its Atyrau Regional Branch, as well as by the Akimat of the city of Atyrau. The CRCs at the regional and central levels are chaired by leaders responsible for the overall functioning of the GRM and its effective and timely implementation, while the coordinators are responsible for engaging the relevant parties and coordination. The coordinators are responsible for engaging the relevant parties and coordinating the work of the MRJ at the regional/central levels.

Regional Level (Atyrau Regional Branch of JSC "NC "KazAutoZhol")

5. At the first stage, an attempt will be made to resolve the complaint through KRZh at the regional level using the following steps.

6. Complaint Registration: Applicants or interested parties may visit, call, or send a letter in paper or electronic form, as well as by fax, to the akimat of the settlement and/or to the complaint coordinator at the Atyrau regional branch of JSC "NC "KazAvtoZhol". The receipt of complaints submitted in person, by phone, by letter in paper or electronic form, or by fax will be confirmed. At the regional level, KRZ also considers anonymous complaints if the applicant refuses to provide contact information or if the contact information is not included in the complaint received by mail in paper/electronic form/fax. Complaints will be recorded in the standard format provided in the Guidelines.

7. Handling Complaints: Requests and complaints that have been clarified and resolved at the time of receipt are closed immediately. Cases requiring further assessment and action are reviewed by the Regional Complaint Review Committee (RCRC) at the regional level. The RCRC at the regional level: (i) holds meetings twice a month, although special meetings for specific cases may be organized as necessary; and (ii) discusses the complaint within ten working days and recommends its resolution to the parties. The CRC coordinator at the regional level disseminates the relevant information among CRC members, prepares minutes of CRC meetings and progress reports, and ensures that actions and decisions are properly documented.

8. Ensuring Feedback: Complaints submitted in person or by phone will be acknowledged. Complaints received in writing or by email will be confirmed by letter/email/fax within 3 working days from the moment the GRM coordinator at the regional level receives them. If the complaint is not related to project activities or impacts arising from project implementation and cannot be addressed under this GRM Manual, feedback will be provided to the complainant indicating the authority (local / district / regional akimat level, respectively) to which it was forwarded.

9. If the complaint is resolved at the regional level, the party that filed the complaint will be informed of the results. If the complaint is not resolved at the regional level and is forwarded to the CRH at the central level for review and resolution, the relevant information will be provided to the party that filed the complaint, including the date the case was forwarded to the CRH at the central level and the expected date for a decision at the central level.

10. In the case of anonymous complaints, the response in paper form will be posted on the information boards of the Atyrau City Akimat and the Atyrau regional branch of JSC "NC "KazAvtoZhol", so that the person who submitted the complaint can come and read the response.

Central Level

11. After an unsuccessful review of the complaint by the CRCH at the regional level, an attempt will be made to resolve the complaint at the central level using the following steps.

12. Complaint handling: if a complaint cannot be resolved through the Regional Consumer Commission (RCC) at the regional level, it will be forwarded for consideration to the RCC at the central level, along with all relevant documents. The RCC at the central level: (i) holds meetings on a monthly basis, although special meetings for specific cases may be organized as necessary; and (ii) reviews complaints within twenty working days and recommends their resolution to the parties. The central-level RCC coordinator disseminates relevant information among RCC members, prepares minutes of RCC meetings and progress reports, and ensures that actions and decisions are properly documented.

13. Ensuring feedback: if a complaint has been resolved, the party that filed the complaint will be informed of the outcome of the complaint resolution. If the complaint was not resolved by KazAvtoZhol at the central level, the relevant information will be provided to the party that filed the complaint, including details on why the case was not resolved and recommendations to seek a resolution within the legal system of the Republic of Kazakhstan.

14. In the case of anonymous complaints, or if the person who filed the complaint refused to provide contact information, a written response will be posted on the information boards of the Atyrau City Akimat and the Atyrau Regional Branch of JSC "NC "KazAvtoZhol", as well as JSC "NC "KazAvtoZhol".

Legal System

15. If, after intervention and assistance from the CRJ at both the regional and central levels, a resolution has not been reached, and the complaint review system does not satisfy the parties who filed the complaint, the case will be referred to court for resolution in accordance with the legislation of the Republic of Kazakhstan.

16. At the same time, it should be emphasized that the CRJ Guidelines do not limit the right of the complainant to take the case to court at the initial stage of the complaint review.

Complaint Coordinators and Composition of the CRJ

17. The CRJ at the regional level may include the following representatives:

- Atyrau Regional Branch of JSC "NC "KazAvtoZhol": - Director (or the corresponding Deputy Director, Project Manager) appointed by the head of the CRJ at the regional level- Specialist appointed as the CRJ Coordinator at the regional level;
- Atyrau City Akimat:- Representative of the State Enterprise "Land Relations Department";- Representative of the State Enterprise "Department of Architecture and Urban Planning";- Representative of the "Department of Passenger Transport and Highways".

18. In addition, representatives of the design organization, construction contractor, and supervising consultant may also be included in the regional CRJ or invited to regional CRJ meetings to address issues within their competence.

19. The PL or other parties with concerns may personally visit, call, or send a letter or fax to the regional CRJ.

KRZh Contacts (regional level): Contact person: Address: Kazakhstan, Atyrau Region, Atyrau, Isatai Taimanov St. 5 Phone: +7 (7122) 29-06-75, 29-01-49; Fax: +7 (7122) 29-06-77 Email: atyrau.info@gaj.kz

20. The central KRJ includes the following members:- Ruslan Kusainov, Director of the Project Implementation Department of JSC "NC "KazAvtoZhol", appointed as Head of the KRJ at the regional level;- Nurlan Bekmurzayev, Chief Credit Manager of JSC "NC "KazAvtoZhol", appointed as KRJ Coordinator at the central level;- Altyn Otunbayeva, Category 1 Project Management Engineer of JSC "NC "KazAvtoZhol", responsible for the development of project documentation;- Ardak Kaireidenov, Director of the Atyrau Branch of JSC "NC "KazAvtoZhol";- Azamat Kabdygaliev, Deputy Director overseeing the Project.

21. In addition, representatives of the design organization, the construction contractor, and the supervisory consultant, as well as the akimat of Atyrau city, may also be included in the composition of the central-level CRH or invited to the central-level CRH meetings to address issues within their competence.

22. Contact details of the KRZh Coordinator at the central level: KRZh contacts (central level): JSC "NC "KazAutoZhol" Contact person: Bekmurzayev Nurlan, Oshakbayeva Altyn Address: Kazakhstan, Astana, Abu Dhabi Plaza BC, 60/4 Syganak Street Phone: +7 (7172) 64-87-72 Email: info@gaj.kz.

Publication of the complaint review process

23. The complaint resolution process under this ESMF was disseminated through informational brochures provided by the OPCs. The mechanism for handling complaints was also presented by the ES Consultant during public consultations and informal meetings in the Project implementation area.

11.5 GRM – Monitoring and Evaluation

Grievance monitoring system has three main facets:

- a. Digital Registry: a centralized database depicting all grievances with timestamps, categories, and status (number resolved within the stipulated timeline, number not resolved within the timeline, and number escalated up).
- b. Assigning unique identification numbers to each case to enable effective tracking and draw generalized inferences for the impact groups/ sub-groups for future endeavors.
- c. Dashboard reporting: A bird's eye view of the summarized happenings in the form of simple table, charts etc and depicting performance based on a set of simple indicators.

Apart from concurrent monitoring, evaluations are to be carried out designed around: audits, surveys, focus group discussions and case studies. PIU, PMC and CSCs shall play an important role in undertaking these. Stakeholder engagement with focus of attention on grievance management, as presented below, could help further.

Table 10: Stakeholder Engagement

Stakeholder Group	Grievance Risk	Engagement Strategy	Monitoring Tool
Local occupiers and users as well as those affected by access restrictions	High (compensation delays)	Targeted consultations, legal aid access	Monthly grievance log review
Informal settlers or those without formal titles	High (exclusion risk and could face forcible eviction)	Mobile outreach, translated materials	Vulnerability tracking
Construction workers – at workplace and labor camps	Medium (labor conditions)	Toolbox talks, anonymous hotline	Contractor grievance dashboard
Workplace environment – contractor, PIU, PMC, QAJ etc.	Medium- SEA/SH	Mobile outreach, Anonymous hotline	Dashboard at Contractor and Akimat offices.
Women & elderly	Low–Medium (access barriers)	Gender-sensitive outreach, local mediators	Satisfaction surveys
Local Akimats	Low-Medium (coordination gaps)	Joint grievance committees	Resolution time audits

12. Monitoring, Evaluation & Reporting

The PIU with due support from PMC and CSC shall shoulder responsibility for monitoring, evaluating and reporting of the status and progress on stakeholder engagement including grievance management. While the concurrent monitoring can be reported on a monthly/ quarterly basis, as agreed to in Environmental and Social Action Plan (ESAP), environmental and social performance should be done on an annual basis. Based on the outcomes, mid-course correction activities will be planned.

Regional/ rural akimats and regional branch offices of QAJ and PIU/ PMC record information related to the SEP implementation so that community responses and feedback can be provided for stakeholders. Independent consultants, in line with annual monitoring.

The PIU will prepare, as a part of monitoring ESAP, and include a chapter on stakeholder engagement and grievances in the monthly/ quarterly Project reports, and annual reports. The reports will include, among others, the following information:

- Place and time of held consultation meetings and other types of engagement activities, with information on the number of participants.

- Issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the PIU.
- Number and types of grievances raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism

The following table presents basic SEP parameters to be monitored and reported on.

Table 11: SEP Parameters

Issues	Monitoring Indicators
Set up of institutional arrangements	<ul style="list-style-type: none"> Establishment of the PIU, PMC focal person for monitoring implementation of the SEP and other E&S documents
Grievance mechanism (GM) (covered earlier in detail)	<ul style="list-style-type: none"> Number and type of published information about GM Number of complaints/enquiries and its nature Number of complaints resolved Number of complaints/ enquiries pending and at what level of the GM
Public consultations/stakeholders' engagement	<ul style="list-style-type: none"> Number of types of consultation meetings Summary of main issues raised, if any Number of meeting participants disaggregated by gender Number and type of information sharing with project affected people Number and type of engagement of people with disabilities and other vulnerable groups. Whether meeting notices were issued sufficiently in advance and required information shared earlier to the meeting in such format/ language understandable by all. Proceedings of the meetings documented, uploaded and disseminated.
Budget expenditures	<ul style="list-style-type: none"> Budget expenditures for SEP implementation and monitoring Overall % of budget disbursement assigned for the SEP implementation and monitoring.
Overall progress against agreed SEP implementation schedule;	<ul style="list-style-type: none"> Any delays and reasons for the same
Plan for the future stakeholder engagement	<ul style="list-style-type: none"> Number and type of engagement planned Number and type of stakeholders engaged (gender disaggregated) Any other indicator not envisaged in this plan
Others	<ul style="list-style-type: none"> Check if outstanding issues raised in the previous monitoring reports have been addressed or not. Suggested mitigation measures

Annex 1 Project Specific Consultations

1. **Minutes of the stakeholder meeting held on October 13, 2025 at Atyrau Regional akimat office. Participants included: Deputy akimat and the office colleagues, QAJ Central Chief Engineer, QAJ Regional Head, Designers, general public and World Bank Mission representatives.**

Minutes of the Stakeholder Meeting – October 13, 2025.

Venue: Atyrau Regional akimat office.

Chairperson: Deputy Akimat, Atyrau

Participants: Deputy akimat and the office colleagues, QAJ Central Chief Engineer, QAJ Regional Head, Designers, general public and World Bank Mission representatives.

Issues Discussed. Key issues discussed were related to: (i) Land Acquisition; (ii) Utility Relocation; and (iii) Environmental and Social Health and Safety.

Land Acquisition: Discussions were centered around (i) difference between Registered and Un-registered lands; (ii) acquiring registered lands when the lease period is still active and/ or when it has lapsed; (iii) how to address the problems related to unregistered lands. The Akimat acknowledged and appreciated the issues and suggested that QAJ in collaboration with the akimat draw a roadmap outlining processes to enable smooth land acquisition. QAJ subsequently prepared the road map.

Utility Relocation. Given a number of street light poles, transmission and distribution power lines, oil pipelines, rail crossings etc. the meeting acknowledged that this will be a challenging task as it involves not only sizeable money but also technical skills and careful planning. QAJ sought akimat's cooperation in addressing this issue.

ESHS: The meeting emphasized the importance of ESHS especially due to the fact that the project is being executed through a Design-Build-Maintain (DBM) mode. So managing the 'contractor' assume significance and QAJ does have substantial experience in this. The project shall supplement and complement QAJ's efforts with additional capacity support – project management consultants, and construction supervision consultants.

2. Minutes of the meeting of members, entrepreneurs, tourists of Dossor village, October 16, 2024



Annex 1.1 Original translation Consultations Oct 16th 2024.pdf

3. Minutes of the meeting of stakeholders – October 30, 2024



Annex 1.2 original translation Oct 30th 2024 Consultations.pdf (Command Line)

4. Minutes of the meeting of stakeholders, December 23, 2024



Annex 1.3 Dec 2024 - Original Trans- Consultations.pdf

Annex 2 Details of other Consultations

Held in the context of the Road Projects in and around A-27 High Way and Atyrau region, Kazakhstan.

Annex 2.1 Transport Resilience and Connectivity Enhancement Project (P500565)
Reconstruction of Zhezkazgan-Karaganda section of the A17 Highway

(Financed by the World Bank)

Date	Place	Participants	Agenda
February 3, 2022	Zhezkazgan Ulytau region	Representatives of Kengyr rural area, Sarysu rural area, Zhezkazgan akimats Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP “Kazdorproekt” & “Semdorproekt” Local community representatives	Presentation of engineering solutions for section km 533-583
March 29, 2022	Abay town, Abay district, Karagandy region	Representatives of Abay district akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP “Kazdorproekt” Local community representatives	Presentation of engineering solutions for sections km 925-946
March 31, 2022	Aktas village, Karagandy region	Representatives of Saran town & Aktas village akimats Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP “Kazdorproekt” Local community representatives	Presentation of engineering solutions for sections km 925-946
September 1, 2022	Zhezkazgan, Ulytau region	Representatives of Zhezkazgan akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP “Almatyodorproekt” Local community representatives	Presentation of working design for section km 433-483
September 13, 2022	Batyk village, Shet district, Karagandy region	Representatives of Batyk village akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP “Kostanaidorproekt” Local community representatives	Presentation of engineering solutions for sections km 783-833

September 13, 2022	Akoy village, Shet district, Karagandy region	Representatives of Akoy village akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kostanaidorproekt" Local community representatives	Presentation of engineering solutions for section km 833-883
September 13, 2022	Krasnaya polyana village, Shet district, Karagandy region	Representatives of Krasnaya polyana village akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kostanaidorproekt" Local community representatives	Presentation of engineering solutions for section km 833-883
September 13, 2022	Yuzhnyi village, Shet district, Karagandy region	Representatives of Yuzhnyi village akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kostanaidorproekt" Local community representatives	Presentation of engineering solutions for section km 833-883
September 13, 2022	Bidayk village, Zhanarka district, Zhezkazgan region	Representatives of Bidayk village akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kostanaidorproekt" Local community representatives	Presentation of engineering solutions for section km 783-833
November 30, 2022	Aktubek village, Zhanarka district, Ulytau region	Representatives of Zhanarka district akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kazdorproekt" & "Semdorproekt" Local community representatives	Presentation of engineering solutions for section km 633-683
November 30, 2022	Yeraliyev village, Zhanarka district, Ulytau region	Representatives of Zhanarka district akimat Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kazdorproekt" & "Semdorproekt" Local community representatives	Presentation of engineering solutions for sections km 633-683, km 683-733, km 733-783
April 7, 2023	Batyk & Akoy villages, Shet district, Karagandy region	Representatives of Batyk and Akoy villages akimats Representatives of Karagandy regional branch of QAJ Representatives of the designer LLP "Kostanaidorproekt" Local community representatives	Report on potential impacts, working design for section km 783-795
June 24, 2024	Zhezkazgan city, akimat	KazAutoZhol Zhezkazgan, Dong Song Eng LTO, KazDorNII JSC, WB, Department of Ecology of Ulytau region, ROO ASBC, ER	Information about the project, presentations of environmental and

Annex 2.2 AKTOBE REGIONAL ROADS KAZAKHSTAN (PR 012354)**(Financed by EBRD)**

No	Date/ Location/ Type	Present Stakeholders/ Key issues discussed
10	Nov-Dec 2024 Online questionnaire. Project information disclosure over telephone	Affected land users Project information disclosure and socioeconomic information collection
9	September 2024 Face to face interviews	Khromtau district Deputy councillor and Karabutak rural area council Project Presentation; Socio-economic conditions; Local development plans; Possible road construction & operation impacts; Communication channel with municipality; Grievance mechanism
8	September 2024 Face to face interviews	KAZ Regional Branch Deputy Director, Quality Control and Traffic Safety Department Head and chief specialist Land acquisition requirements; Project local suppliers capacity; Road users profile; Traffic accidents; Road maintenance depots capacity; Tolling arrangements
7	05.09.2022 Karabutak Consultation for national feasibility study EIA for Section 6 km 965-1025	Rural area councillor, council specialists, KAZ representative and local resident Location and number of bus stops, underpasses or overpasses for livestock and agricultural machinery
6	15.02.2023 Karabutak	Villages residents, local authorities, secondary school teachers, KAZ and designer representatives Construction of an exit and access road to the reed board factory (Belkopa branch). Construction of access road to the campsite in the area of the television tower. Around Belkopa settlement, 2 livestock underpasses and construction of an overpass for the agricultural machinery combined with livestock underpasses are envisaged. Two rest areas will be located near Belkopa. No petrol stations will be provided at the rest areas. Heated sanitary-hygienic units with market places are provided. Construction of the campsite after the project implementation. Possibility of building a campsite at km 932. Reconstruction of an existing road. Construction of livestock underpasses, overpass for the agricultural machinery and road fence installation. Construction of six bus stop shelters. Start date of project implementation. Construction of WC. Solid domestic waste collection areas with waste containers. Construction of pedestrian subway. Approaches to existing petrol stations. Construction of a drainage channel along the road to divert flood water from Korpe village. Demolition and reconstruction of existing bridges. Reinforcement of dam in front of bridge at km 961+370 with concrete slabs. Digging a ditch in the ground from the bridge on the dry valley to Kopyssay River bridge to divert meltwater during flood season. Construction of dam along Kopyssay village to prevent flooding of houses and a cemetery. Construction of access roads to peasant farms. Construction of 3 turnout areas. Outdoor lighting.
5	14.02.2023 Korpe	
4	14.02.2023 Belkopa Consultations for national feasibility study EIA for Section 5 km 927-965	

No	Date/ Location/ Type	Present Stakeholders/ Key issues discussed
3	<p>14.11.2024, Aktobe region, Khromtau district, Bogetsay village</p> <p>Consultation for national feasibility study EIA for Section 4 km 889-927</p>	<p>Farmers, village residents, local entrepreneurs, rep. of Department of Natural Resources and Regulation of Nature Management of Aktobe region and KAZ company, local authorities.</p> <p>A local resident asked for another livestock underpass at the end of the road. Response: This request will be considered by KAZ during design. Question about the land of peasant farms that will be crossed by the new road. Response: An agreement will be drawn up with each farm owner.</p>
2	<p>14.12.2022 Khromtau</p> <p>Consultation for national feasibility study EIA for Section 2 km 819-847</p>	<p>Farmers, elderly union, local parliament and council members</p> <p>Report of the representative of the project organization Almaty dorproekt LLP - Bakhtagaliev A.K. Report of environmental engineer of individual entrepreneur 'Kan L.V.' - Seitkenov K.S.</p> <p>Reducing of road length due to bypass is 2 km. Runoff (drainage) of water that accumulates between two road embankments during rainfall and snowmelt. Fencing the road against livestock intrusion.</p> <p>Medium repair of adjacent roads (junctions). Access to pastures and development of underpasses for livestock. Strengthening of Badamsha road due to flow of heavy vehicles to/ from the Russian Federation. Local roadway to Donskoi (Don) village replacement, fencing of road, and marking of livestock underpasses. Construction of bridge on the road to Abai settlement. Maintaining the existing bypass around Khromtau. Compensation for withdrawal of land. Width of protection zone of main gas pipeline. Width of steel mesh fenced areas.</p>
1	<p>9.11-20.12.2023 Bekkul baba</p> <p>Consultation for national feasibility study EIA for Section 1 km 763-791</p>	<p>Teachers, village residents, rep. of Almaty district of Aktobe city</p> <p>Charging local trips between villages. Improvement of accesses roads to villages and village streets. Rivers pollution with construction waste. Tree lines clearance to widen the road.</p>

Annex 3 Typical Grievance Redress Process

Grievance Redress Procedure – Step-by-Step Framework

1. Awareness & Accessibility

- Publicize the grievance mechanism widely: brochures, community meetings, signage at construction sites
- Ensure multiple access points --
- Local contact offices (e.g., Akimat or contractor site office)
- Hotline or dedicated phone number
- Email or online submission portal
- Suggestion boxes at construction sites or community centers
- Include provisions for vulnerable groups (e.g., women, elderly, ethnic minorities)

2. Submission of Grievance

- Accept complaints in person, by phone, email, or anonymously
- Record basic details: date, location, nature of grievance, contact info (if provided)

3. Registration & Acknowledgment

- Log the grievance in a centralized system
- Acknowledge receipt within the stipulated time frame.
- Assign a unique ID for tracking

4. Screening & Categorization

- Initial screening by the GRM focal point
- Determine if the grievance is:
 - Routine (e.g., noise, dust)
 - Complex (e.g., land acquisition, labor rights)
 - Urgent (e.g., safety hazard)
- Assign to appropriate resolution tier

5. Investigation

- Conduct site visits, interviews, and document review
- Engage relevant stakeholders (contractors, local authorities, community reps)
- Complete investigation within the stipulated timeline

6. Resolution & Communication

- Propose corrective action or mitigation
- Communicate outcome to complainant in writing or verbally
- If unresolved, escalate to higher-level committee or external mediator
- Option for judicial recourse if internal resolution fails

7. Closure & Documentation

- Mark grievance as resolved or escalated
- Update grievance log with resolution details
- Archive supporting documents

8. Monitoring & Reporting

- Monthly/quarterly reports to project management and donors
- Analyze the happenings to draw lessons for future
- Share anonymized summaries with communities to build trust
- Public disclosure of grievance statistics and outcomes

Annex 4 Public Grievance Form

Document number:	
Full name	Name Surname _____
Note: please mark, whether you agree to disclose your personal details to third parties without your consent?	I ask not to disclose my personal details without my consent / I would like to submit this grievance anonymously
Contact details	Address _____
Note: Please mark how you wish to be contacted (mail, telephone or e-mail)	Telephone / e-mail _____
Preferred Language for communication	<input type="checkbox"/> Kazakh
	<input type="checkbox"/> Russian
	<input type="checkbox"/> English
	<input type="checkbox"/> Other (please, specify) _____
Description of an incident/enquiry or a grievance: What has happened? Where did it happen? Who was involved in an incident? What are the consequences?	
Date of Incident / Grievance	Please mark the date (month / year)
	One time incident (date)
	Happened more than once (how many times?) Ongoing (current problem)
What would you like to see happen to resolve the problem?	
Signature: Date: Please send this form to the following address: Contact person: ----- Address: ?? Tel: +7 702 287 90 90/+ 701 916 77 07?? Email: .info@qaj.kz /ulytau.info@qaj.kz??	

Annex 5 : Grievance Log Form

No	Particulars	Description
1	Grievance ID	Unique Tracking Number
2	Date of receipt	
3	Complainant Name (or Anonymous)	Confidentiality to be maintained, as appropriate
4	Method of submission	Telephone, email, written, anonymous
5	Status	PAP, Man/ Woman, Individual / Enterprise?
6	Contact information	Address, telephone , email id
7	Location	Site/ village/ road km/ district etc
8	Nature of Grievance	Labor conflict/ compensation/ SEA/SH etc
9	Description of the grievance	
10	Responsible Officer	GRM focal point or project staff or
11	Investigation summary	Findings, action proposed, consultations, action taken
12	Resolution provided	Outcomes
13	Timeline	Days/ week/ months
14	Status as of date	Open / Resolved / Escalated
15	Remarks	Follow up actions, lessons for future