

Darbaza–Maktaaral Railway Expansion Project

Draft Stakeholder Engagement Plan



**ҚАЗАҚСТАН
ТЕМІР
ЖОЛЫ**

Report Control

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Acronyms and Abbreviations

Acronym	Definition
ADB	Asian Development Bank
AIIB	Asian Infrastructure Investment Bank
ACBK	Association for the Conservation of Biodiversity of Kazakhstan
BAP	Biodiversity Action Plan
CAP	Corrective Action Plan
CESMP	Construction Environmental and Social Management Plan
CLO	Community Liaison Officer
EPC	Engineering, Procurement and Construction
ESCA	Environmental and Social Compliance Audit
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESHS	Environmental, Social, Health and Safety
GBVH	Gender-Based Violence and Harassment
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IBA	Important Bird and Biodiversity Area
IFC	International Finance Corporation
IESC	Independent Environmental and Social Consultant
KBA	Key Biodiversity Area
KTZ	Kazakhstan Temir Zholy JSC
LARP	Land Acquisition and Resettlement Plan
N&V	Noise and Vibration
OVOS	Otsenka Vozdeystviya na Okruzhayushchuyu Sredu (National EIA)
PAP	Project-Affected Person
PIB	Project Information Brochure
PS	IFC Performance Standard
SEA/SH	Sexual Exploitation and Abuse / Sexual Harassment
SEP	Stakeholder Engagement Plan
SPS	ADB Safeguard Policy Statement
VEAB	VISTA Environment AB

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1. Introduction and Background

1.1 Background

The Asian Development Bank (ADB), the International Finance Corporation (IFC), and the Asian Infrastructure Investment Bank (AIIB) are considering providing financing to Kazakhstan Temir Zholy JSC (KTZ) for the construction and initial operation of the Darbaza–Maktaaral Railway Expansion Project (the Project). The Project is being delivered under an Engineering, Procurement and Construction (EPC) contract with Integra Construction KZ LLP (Integra).

Construction of the Project commenced in 2024. This Stakeholder Engagement Plan (SEP) has been prepared in parallel with the Supplementary Environmental and Social Impact Assessment (Supplementary ESIA) and the Environmental and Social Compliance Audit (ESCA), in accordance with the Lenders' environmental and social safeguard requirements.

The Project has been classified as Category A by each Lender under its own categorization instrument: by ADB under the Safeguard Policy Statement (SPS, 2009); by IFC under its Policy on Environmental and Social Sustainability and the associated environmental and social review procedure, against which the IFC Performance Standards (2012) are then applied; and by AIIB under the Environmental and Social Framework (ESF, 2024).

1.2 Purpose and Scope of the SEP

The purpose of this Stakeholder Engagement Plan is to:

- Identify all stakeholders of the Project across all phases and define targeted engagement approaches for each group;
- Set out the methods, timing, and responsibilities for ongoing stakeholder consultation and information disclosure;
- Document stakeholder engagement undertaken to date;
- Describe the project-level Grievance Redress Mechanism (GRM) — including its structure, timelines, procedures, and links to lender accountability mechanisms;
- Outline information disclosure commitments and channels; and
- Define monitoring and reporting arrangements for SEP implementation.

The SEP applies to the construction phase (ongoing) and the operational phase of the Project. It is a living document and will be updated at material changes to Project scope, design, or stakeholder circumstances, and at each major disclosure event.

This SEP applies to all stakeholder engagement activities undertaken for the Project by KTZ, by Integra as EPC Contractor, and by any other party contracted by KTZ that engages with the Project stakeholders identified in this Plan. Construction is already well advanced at the time of writing: this SEP is therefore primarily prospective in focus, building on — rather than repeating — the stakeholder engagement already conducted, including the 2023 national public hearings and the May 2026 ESIA community consultations (Section 7).

This SEP has been prepared in accordance with ADB Safeguard Policy Statement (2009) Safeguard Requirement 1; IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts; and the stakeholder engagement, information disclosure and grievance mechanism requirements of AIIB Environmental and Social Standard 1 under the AIIB Environmental and Social Framework (2024).

1.3 Structure of the SEP

The SEP is organized as follows:

- Section 1 — Introduction and Background (this section).
- Section 2 — Project Description: overview of the Project's components, location, and key activities.
- Section 3 — Applicable Reference Frameworks: national legal requirements and ADB, IFC, and AIIB stakeholder engagement and disclosure requirements.
- Section 4 — Stakeholder Identification and Analysis: categories of stakeholders, their interests and vulnerabilities, and stakeholder mapping.
- Section 5 — Institutional Analysis: roles and relationships of key institutional stakeholders.
- Section 6 — Planned Stakeholder Engagement Activities: engagement methods, timing, and responsibilities by stakeholder group.
- Section 7 — Stakeholder Engagement to Date: summary of consultations undertaken during ESIA preparation.
- Section 8 — Grievance Redress Mechanism: structure, procedures, escalation levels, SEA/SH provisions, and contacts.
- Section 9 — Information Disclosure: documents to be disclosed, languages, channels, and timing.
- Section 10 — Resources and Responsibilities: roles of KTZ, EPC Contractor, IESC, and supporting consultants, including training and capacity building.
- Section 11 — Monitoring and Reporting: indicators, responsibilities, reporting commitments, and the SEP-GRM implementation schedule.
- Annexes: A — Consultation Records; B — GRM Log; C — You Said / We Did Matrix; D — Grievance Form; E — Format for Reporting Stakeholder Engagement.

2. Summary Description of the Project

2.1 Project Overview

The Darbaza–Maktaaral Railway Expansion Project is a strategically significant greenfield railway infrastructure development located in Turkistan Region (oblast) of southern Kazakhstan. The Project is intended to relieve capacity constraints on the existing Kazakhstan–Uzbekistan rail corridor, enhance regional freight connectivity, and support growing international and transit trade flows across Central Asia.

The Project is identified in multiple national strategic frameworks including the National Project 'Strong Regions — Driver of Country Development' (Government Resolution No. 729, October 2021) and is a direct response to the President of the Republic of Kazakhstan's direction on developing Kazakhstan's transport-transit potential.

The Project comprises approximately 115 km of new single-track railway together with approximately 45 km of sidings and passing loops, crossing five districts (rayons) of Turkistan Oblast — Saryagash, Keles, Shardara, Zhetysay, and Maktaaral. Key components include:

- The main rail alignment — earthworks, track formation, ballast, sleepers and rails — through all five districts;
- Three stations (Yerdaut, Intermediate and Maktaaral) and two passing loops, with associated depots and operational facilities;
- 33 major structures crossing the alignment — 25 bridges (including the approximately 500 m crossing of the Syr Darya River), 5 railway overpasses, 2 road overpasses and 1 tunnel with cattle underpass — together with approximately 130 drainage culverts;
- Access roads, borrow pits, concrete batching plants, material storage and laydown areas, and other construction support facilities; and
- Worker accommodation camps and associated welfare, sanitation, and utility services.

At the time of preparation of the Supplementary ESIA (May 2026), more than 100 km of the alignment had been levelled and approximately 4 km of track laid near Erdaulet Station, with works ongoing concurrently at the stations, passing loops and the 500 m Syr Darya bridge crossing. By September 2026, approximately 90 km of track had been laid (Section 2.3). Independent environmental and social oversight is provided by an Independent Environmental and Social Consultant (IESC) engaged to support KTZ and the Lenders.

2.2 Key Project Components

The Project comprises approximately 115 km of new single-track railway, together with approximately 45 km of sidings and passing loops, across five districts (rayons) of Turkistan Oblast. Key components include:

- Construction of the main rail alignment, comprising earthworks, track formation, ballast, sleepers, and rails through Saryagash, Keles, Shardara, Zhetysay and Maktaaral districts;
- Three stations (Yerdaut, Intermediate and Maktaaral) and two passing loops, including associated depots, maintenance, servicing and operational facilities;
- 33 major structures crossing the alignment — 25 bridges (including the approximately 500 m crossing of the Syr Darya River), 5 railway overpasses, 2 road overpasses and 1 tunnel with cattle underpass — together with approximately 130 drainage culverts;
- Development of access roads, borrow pits, concrete batching plants, material storage and laydown areas, and other construction support facilities; and

- Establishment of worker accommodation camps and associated welfare, sanitation, and utility services.

2.3 Project Status and Key Parameters

Construction commenced in 2024. By September 2026, more than 100 km of the railway alignment had been levelled and approximately 90 km of track laid, with works under way at the stations, the passing loops and the Syr Darya bridge. Approximately 800 workers are engaged on the Project, and construction is planned to be completed around the end of 2026.

The Project is delivered by EPC Contractor Integra Construction KZ LLP, with multiple subcontractors operating simultaneously across different work fronts. Independent E&S oversight is provided by the Independent Environmental and Social Consultant (IESC).

2.4 Stakeholder Engagement Context

Given the advanced status of construction, this SEP focuses primarily on: ongoing and future engagement with communities affected by the remaining construction phase; disclosure of the Supplementary ESIA and associated management plans; and arrangements for continued engagement through the operational phase. This SEP builds on stakeholder engagement activities already conducted, including national public hearings in 2023 and ESIA community consultations conducted in May 2026.

3. Applicable Reference Frameworks

The Project will conform to the legal and administrative requirements of the Republic of Kazakhstan and to the stakeholder engagement and disclosure requirements of ADB, IFC, and AIIB.

3.1 National Legal Requirements in Kazakhstan

A national Environmental Impact Assessment (OVOS) was undertaken for the Project in accordance with the Environmental Code of the Republic of Kazakhstan (Code No. 400-VI ZRK of 2 January 2021), including mandatory public hearings. Local executive bodies (Akimats) are required to make the draft OVOS accessible online for at least 30 days and to give advance notice in press, TV, and radio in Kazakh and Russian at least 20 working days before public hearings (Article 73), consistent with the Aarhus Convention. Kazakhstan's national legislation does not otherwise mandate stakeholder engagement during construction or operation; the requirements below therefore govern this SEP for those phases.

3.2 ADB Safeguard Policy Statement (2009)

Under ADB SPS (2009) Safeguard Requirement 1, Category A projects require meaningful consultation with affected people throughout the project cycle, disclosure of relevant information in an understandable and accessible form, and a project-level grievance mechanism. Safeguard Requirement 2 (Involuntary Resettlement) sets out related consultation requirements given effect through the LARP.

3.3 IFC Performance Standards (2012)

Table 1: IFC Performance Standards (2012)

Performance Standard	Key Requirements Relevant to this SEP
PS1: Assessment and Management of Environmental and Social Risks and Impacts	Develop and implement a Stakeholder Engagement Plan scaled to the Project's risks and impacts; consultation must begin early, be based on prior disclosure, focus on those directly affected, be free of manipulation, enable meaningful participation, and be documented; establish a grievance mechanism accessible at no cost.
PS2: Labour and Working Conditions	Inform workers of their rights under national labor law and provide a worker grievance mechanism, accessible from the time of recruitment.
PS4: Community Health, Safety and Security	Disclose information on health and safety risks and management measures to affected parties and authorities.
PS5: Land Acquisition and Involuntary Resettlement	Undertake extensive consultation and negotiation with affected parties, including host communities; establish an external grievance mechanism as early as possible.
PS6: Biodiversity Conservation	Disclose to relevant stakeholders any direct loss or alteration of habitat, including near the Shardara Reservoir IBA/KBA.
PS8: Cultural Heritage	Apply a chance-find procedure in the event of a discovery during construction.

3.4 AIIB Environmental and Social Framework (2024)

Under the AIIB Environmental and Social Framework (2024), Environmental and Social Standard 1 requires stakeholder engagement throughout the project cycle, timely and culturally appropriate disclosure of information, and a grievance mechanism proportionate to the Project's risks and impacts.

3.5 Summary of Lender Requirements

ADB, IFC and AIIB all have specific requirements for stakeholder engagement as part of their policies and standards. The requirements are summarized in the following table.

Table 2: Lender Requirements for Stakeholder Engagement

Aspect	IFC (Performance Standard 1)	ADB (Safeguard Policy Statement, 2009)	AIIB (Environmental and Social Framework, 2024)
Purpose	Identify & manage environmental & social risks; ensure stakeholder input	Ensure project affected people can participate and voice concerns; identify risks	Promote early and ongoing stakeholder engagement; integrate community feedback into project design
Timing	Early, before project decisions	Early, during project preparation; before approval	Early, during project planning; continue throughout lifecycle
Scope of Consultation	All potentially affected communities, especially vulnerable groups	Affected people and key stakeholders, with attention to vulnerable groups	All affected parties, including vulnerable and marginalized populations
Disclosure of Information	Accessible, timely, relevant, in local language	Provide project info in understandable form; timely disclosure	Timely and accessible info; culturally appropriate formats
Inclusiveness	Must consider marginalized, vulnerable groups, gender, cultural norms	Inclusive participation; special measures for vulnerable groups	Inclusive and culturally appropriate; attention to vulnerable groups
Two-Way Communication	Stakeholders can express concerns; responses provided	Encourage feedback and dialogue; integrate into project design	Interactive engagement; two-way feedback loops required
Documentation	Record consultations, concerns, and responses	Document consultation process and outcomes	Record engagement process, concerns raised, and actions taken
Ongoing Engagement	Throughout project lifecycle	Continuous as impacts evolve	Continuous, throughout project lifecycle and adaptive to changes
Grievance Mechanism	Required; fair, transparent, timely	Required; accessible and responsive	Required; transparent, accessible, and timely

4. Stakeholder Identification and Analysis

4.1 Key Definitions

In accordance with the ADB SPS (2009), IFC PS 1, and AIIB ESF, stakeholders are categorised as follows:

- **Affected Parties** — individuals, communities, businesses, and institutions directly or indirectly affected by the Project, both positively and negatively.
- **Other Interested Parties** — parties who are not directly affected but have roles, mandates, or a demonstrated interest in the Project.
- **Disadvantaged and Vulnerable Individuals or Groups** — individuals or groups who may require special engagement efforts due to their vulnerability, including barriers to participation, information, or redress.

4.2 Affected Parties

4.2.1 Primary Affected Parties

Primary affected parties are individuals, households, organizations and communities that have a direct physical, economic or social interface with Project construction or operation.

Land acquisition and resettlement

The Revised Draft Land Acquisition and Resettlement Plan (LARP v4.0, 2 September 2026) identifies:

- 371 affected land plots;
- 331 unique affected persons (APs), comprising 308 households and 23 legal entities;
- an estimated affected population of 1,744 people; and
- 138 severely affected APs, comprising 132 households and six legal entities. These APs will experience physical displacement and/or the loss of at least 10% of their productive or income-generating assets.

Permanent acquisition will affect 101 structures on 25 plots. These comprise 21 residential structures, 72 auxiliary structures and eight commercial or business-related structures. The structures are associated with 23 unique APs: 20 households and three legal entities. Physical relocation will affect 15 parties, comprising 14 households and one legal entity, and will involve 87 structures: 21 residential structures, 63 auxiliary structures and three commercial structures. The Project's eligibility cut-off date is 16 February 2026, as established by Turkistan Region Akimat Decree No. 50.

These figures are based on the LARP census, socioeconomic survey (SES) and asset inventory undertaken in March and April 2026. The SES covered 227 affected households, representing 1,268 people. The composition of the remaining households was estimated using the average household size of 5.59 people recorded during the census. The figures define the population of project-affected persons (PAPs) requiring targeted engagement under this SEP and will be verified during LARP implementation.

Other primary affected parties

In addition to the people and entities affected by land acquisition and resettlement, the following groups may be directly affected by Project construction or operation:

- Residents of communities along the alignment: Rural communities along the 115 km alignment in Saryagash, Keles, Zhetysay and Maktaaral districts may experience construction noise, vibration, dust and disruption of access, as well as operational railway noise. The alignment also crosses Shardara district at the Shardara Reservoir, although no nearby communities have been identified as affected there.
- Farmers and other agricultural land users: These groups may be affected by disruption to irrigation systems, including the LOTOK channel; restricted access to fields and pastures; and the location or adequacy of agricultural and livestock underpasses. Farmers whose land, crops or access rights are acquired or restricted are also covered by the LARP.
- Residents exposed to elevated noise and vibration: Operational noise modelling and vibration screening identified six community locations requiring particular attention: Maktaaral, Erdaulet/Aktas, Kūriş, Ushagash, Sarızhylyga–Bereke and Shyrildak–Zhabaitobe. Properties within the ≤ 10 m and ≤ 30 m vibration-screening bands may be particularly exposed to construction vibration. The Project has committed to consulting these communities during disclosure of the Supplementary ESIA, as set out in Table 5.
- Students, teachers and users of health facilities near worksites: These groups may be affected by construction noise, including noise during school hours, and by safety risks to children near active worksites.
- Businesses and service providers in Maktaaral/Atakent: Commercial operators may experience temporary access restrictions and vibration impacts on buildings during construction.
- Construction workers: Employees of EPC Integra and its subcontractors may be affected by occupational health and safety conditions, worker accommodation, labour rights issues and access to the worker grievance mechanism.

4.2.2 Secondary Affected Parties

- Communities near borrow pits, access roads, and construction camps.
- Users of cross-corridor roads and irrigation networks experiencing changed conditions.
- Emergency services and utility providers requiring coordinated access planning.
- Potential resource users of the Shardara Reservoir and its margins in the vicinity of the Syr Darya bridge crossing, including fishing and herding groups. No such users have been identified to date through Project studies or consultation. They will be identified through the stakeholder mapping and the biodiversity consultation programme set out in Section 6, and this Section will be updated if resource users affected by construction at the crossing are confirmed.

4.2.3 Cultural Heritage Receptors

Cultural and historical heritage assets along the alignment require pre-construction screening, chance-find procedures, and respectful site conduct in coordination with the relevant Ministry of Culture and local heritage bodies.

4.3 Other Interested Parties

Other interested parties are not directly affected but have mandates or demonstrated interests in the Project:

- National government ministries, including the Ministry of Transport and the Ministry of Ecology and Natural Resources — national policy, regulatory oversight and inter-agency coordination.

- Regional and district authorities, including the Turkistan Oblast Akimat and the Saryagash, Keles, Zhetysay and Maktaaral District Akimats — regional and local coordination and participation, within their competence, in Levels 1 and 2 of the Project grievance redress mechanism, which is owned and operated by KTZ. The Shardara District Akimat will be engaged separately regarding the Shardara Reservoir crossing, although no nearby affected communities have been identified.
- Department of Natural Resources Management of Turkistan Region — administration of borrow-pit permitting and associated public consultation. Although the Department forms part of the regional government, it is identified separately because of its specific permitting role.
- State-owned infrastructure and utility operators:
 - Kazvodhoz — responsible for reservoir operations, water-level management, irrigation and water-distribution systems, and sanitary water-protection zones within the Project area.
- ADB, IFC, and AIIB — standards assurance; disclosure requirements; performance monitoring.
- Environmental NGOs and biodiversity institutions (ACBK) — Shardara IBA/KBA monitoring; sturgeon and bird conservation.
- Academic and research institutions — environmental and biodiversity research in the corridor.
- Media and general public — transparency, awareness, and accountability.

4.4 Disadvantaged and Vulnerable Groups

Targeted engagement measures will be applied for individuals and groups who may face greater barriers to information, participation, or access to the GRM:

The LARP socio-economic survey screened and provisionally identified 93 vulnerable affected households (without double counting), comprising 37 female-headed households, 42 households with four or more children under 18, 7 elderly households without family support, and 7 households with a member with a disability; 41 of the 227 surveyed households (18.1%) are female-headed. Survey findings further indicate that women's direct participation in community decision-making is limited — 69.4% of respondents (152 of 219) reported that women are not always directly involved in community decision-making, and 92.7% (203 of 219) indicated that women's participation would generally occur together with husbands or other male family members. These findings underpin the women-only focus groups, female CLO focal points, and tailored outreach committed in this SEP. Vulnerability status will be verified during LARP implementation.

- Women and girls — particularly regarding GBVH risks, access changes, and livelihood impacts. Women-only focus groups and female CLO focal points are committed.
- Elderly persons — who may have greater difficulty with physical access changes or communication with the project.
- Persons with disabilities — requiring accessible formats for disclosure materials and accessible consultation venues.
- Low-income and severely affected households — including those with disproportionate land or livelihood impacts.
- Uzbek-speaking households in Maktaaral and southern districts — requiring materials in Uzbek and engagement staff with language capacity.
- Agricultural day labourers and seasonal workers — who may be absent during standard consultation hours.

- Female-headed households — who may face additional barriers to engaging through standard male-oriented channels.

These groups, and the differentiated engagement and communication measures needed to reach them, are also informed by the Project-level vulnerability screening (ESMP commitment D-SE-01; ESCA CAP action IPG-1) and by the Gender Action Plan (CESMP-17; ESMP commitment D-SE-02; ESCA CAP action IPG-2), which feed into the SEP and the GRM. The resulting screening outputs and gender actions will be added to the Table 11 monitoring indicators once the Gender Action Plan is approved.

4.5 Stakeholder Mapping and Segmentation

Table 3 maps the principal stakeholder groups according to their interests and concerns, influence on or importance to the Project, applicable engagement phase, and required level of engagement. The classifications are defined below.

Category	Classification	Definition
Influence	High	The stakeholder has decision-making, regulatory or implementation authority, or may experience significant direct impacts requiring close engagement.
	Medium	The stakeholder has a defined advisory, operational or issue-specific role, or may experience localized or indirect impacts.
	Low	The stakeholder has limited ability to affect Project decisions and is unlikely to experience direct or significant impacts.
Engagement phase	PC — Pre-construction	Detailed design, land acquisition, permitting and preparation for construction.
	C — Construction	Site preparation and all construction activities.
	O — Operation	Railway operation and ongoing monitoring.
	All — All phases	Pre-construction, construction and operation.
Engagement level	Intensive	Frequent, two-way engagement and individual or group follow-up concerning significant impacts, entitlements, grievances or corrective actions.
	Regular	Planned and recurring consultation, coordination and information exchange throughout the applicable phases.
	Targeted	Engagement focused on a particular location, impact, technical issue or decision.
	Broad	General disclosure and public-information activities intended for a wide audience.

These classifications are indicative and may be adjusted as Project activities, impacts and stakeholder circumstances change.

Table 3: Stakeholder Mapping and Segmentation

Stakeholder Group	Key Interests / Concerns	Influence	Phase	Engagement Level
Adjacent residents along the alignment (rural communities in Saryagash, Keles, Zhetysay and Maktaaral districts)	Directly affected by construction noise, vibration, dust, access disruption, and land take. Operational noise from passing trains.	High	C, O	Intensive

Stakeholder Group	Key Interests / Concerns	Influence	Phase	Engagement Level
Project-affected persons (PAPs) — land acquisition and resettlement	Loss of land, crops, structures, or access rights; compensation entitlements under the LARP.	High	C	Intensive
Residents near borrow pits, access roads, worker camps	Secondary construction impacts: dust, noise, traffic, water use.	Medium	C	Targeted
Farmers and agricultural land users	Irrigation disruption; access to fields and pasture; underpass adequacy.	High	C, O	Intensive
Commercial businesses in Maktaaral / Atakent	Construction disruption to access and operations; vibration near buildings.	Medium	C	Targeted
Schools, clinics, mosques along the corridor	Construction noise during school hours; dust; child safety near worksites.	High	C	Targeted
Workers (EPC Integra and subcontractors)	OHS conditions; accommodation and welfare; labor rights.	High	C	Regular
National Government (Ministry of Transport, Ministry of Ecology)	Policy compliance; national approvals; OVOS; permitting.	High	All	Regular
Turkistan Oblast Akimat	Regional oversight; coordination with districts; resettlement verification.	High	All	Regular
District Akimats (Saryagash, Keles, Zhetysay, Maktaaral)	Local coordination; participation in GRM Level 1 (within their competence); land registration; community liaison.	High	All	Regular
ADB, IFC, AIIB (Lenders)	Standards assurance; safeguard compliance; monitoring; disclosure.	High	All	Regular

Stakeholder Group	Key Interests / Concerns	Influence	Phase	Engagement Level
Environmental NGOs and biodiversity institutions (ACBK)	Shardara IBA/KBA monitoring; sturgeon conservation; biodiversity offset.	Medium	All	Targeted
Media and general public	Information recipients; transparency; awareness of project activities.	Low	All	Broad

5. Institutional Analysis

Effective stakeholder engagement requires coordination across a range of national, regional, and international institutional stakeholders. Table 4 summarises the roles, responsibilities, and engagement approach for each key institution.

Table 4: Institutional Analysis

Institution	Role	Key Interests	Engagement Approach
Ministry of Transport of the Republic of Kazakhstan	National transport policymaker and government oversight body; strategic oversight of KTZ and the Project.	Alignment with national transport policy; timely Project delivery; compliance with applicable national requirements.	Formal correspondence; quarterly progress meetings; coordination on Project approvals and strategic matters.
Ministry of Ecology and Natural Resources	National environmental policy and compliance oversight, including ecological assessment and biodiversity protection.	OVOS and environmental approval requirements; species and habitat protection; proximity to the Shardara IBA/KBA.	Submission of environmental documentation and permit applications; formal consultations; coordination on biodiversity requirements; and periodic environmental and biodiversity reporting.
Turkistan Oblast Akimat	Regional coordination; oversight of resettlement verification; and escalation of unresolved community grievances.	Effective construction management; livelihood protection; resolution of community concerns; and community acceptance of the Project.	Regular coordination meetings; participation in joint community consultations; oversight of regional commitments; and participation in GRM Level 2 for escalated grievances within their competence.
District Akimats of Saryagash, Keles, Zhetysay and Maktaaral	Local coordination; land relations and registration; community liaison; local approvals; and participation in GRM Level 1 committees chaired by KTZ.	Access to land, fields and pastures; irrigation continuity; adequacy of underpasses; compensation payments; construction impacts; and resolution of local grievances.	Monthly coordination meetings; community consultation sessions; dissemination of Project information; support for land and compensation processes; and participation in GRM Level 1 for grievances within their competence, and forwarding to the CLO of Project grievances lodged at akimat offices.
Shardara District Akimat	Local authority engaged in relation to construction activities at the Shardara Reservoir crossing.	Protection of reservoir users and resources; construction access and safety; biodiversity impacts; and coordination with relevant local stakeholders.	Targeted coordination meetings; consultation concerning the reservoir crossing; support for local notifications and access arrangements; and follow-up of location-specific concerns and grievances.
KTZ JSC	Project owner and long-term railway operator, with overall responsibility for Project environmental	Compliance with lender requirements; management of environmental and social risks; reputational risk; timely Project delivery; and	Internal environmental and social reporting; coordination with government authorities, the EPC Contractor and affected communities; participation in lender

Institution	Role	Key Interests	Engagement Approach
	and social performance.	safe, reliable railway operation.	supervision missions; oversight of grievance management; and implementation and monitoring of the ESIA, ESMP, LARP, SEP and associated plans.
Integra Construction KZ LLP (EPC Contractor)	Construction delivery; implementation of the Construction Environmental and Social Management Plan; and management of worker and community health, safety and grievances.	Site safety; workforce welfare; environmental compliance; community relations; and prevention and timely resolution of construction impacts and complaints.	Daily coordination with workers and subcontractors; toolbox talks and workforce consultations; regular liaison with affected communities and local authorities; advance notification of disruptive works; operation of separate worker and community grievance mechanisms; and monthly ESHS performance reporting to KTZ.
ADB, IFC and AIIB	Project financing; application of relevant lender environmental and social requirements; disclosure; and monitoring.	Compliance with the applicable ADB Safeguard Policy Statement or Environmental and Social Framework, IFC Performance Standards and AIIB Environmental and Social Framework; meaningful stakeholder engagement; effective grievance management; and timely management of environmental and social risks.	Review of environmental and social documentation; supervision missions; periodic meetings with KTZ and the EPC Contractor; review of environmental and social monitoring reports and corrective actions; and disclosure through the relevant lender portals.
Independent Environmental and Social Consultant (IESC)	Independent monitoring and verification of ESMP and corrective-action implementation on behalf of the lenders.	Independent assurance of Project environmental and social performance; identification of non-compliance; and timely closure of corrective actions.	Periodic site inspections; interviews with Project personnel and affected stakeholders; review of monitoring data, grievances and implementation records; preparation of independent monitoring reports; and tracking of corrective actions to closure.
Association for the Conservation of Biodiversity of Kazakhstan (ACBK)	Biodiversity stakeholder and potential monitoring partner supporting implementation of the Biodiversity Action Plan and oversight of impacts associated with the Shardara IBA/KBA.	Protection of the Shardara IBA/KBA; sturgeon and bird conservation; bird-collision risks; and the effectiveness of biodiversity mitigation and offset measures.	Technical consultation and data sharing during preparation of the Final BAP and its implementation; subject to agreement with ACBK, participation in relevant surveys and joint monitoring; review of biodiversity results; and reporting or advice on biodiversity mitigation and offset measures.

The Project crosses five districts, although affected communities and land acquisition are concentrated in four: Saryagash, Keles, Zhetysay and Maktaaral. In Shardara District, the alignment crosses the Shardara Reservoir, but no nearby communities have been identified as directly affected. Given the Project's linear nature and its proximity to the internationally important Shardara Reservoir IBA/KBA, close coordination among KTZ, the EPC Contractor, national and regional authorities, District Akimats, Kazvodhoz and biodiversity organizations will be essential. The institutional arrangements described above provide a framework for coordinated, accountable and adaptive engagement throughout pre-construction, construction and operation.

6. Planned Stakeholder Engagement Activities

Stakeholder engagement activities are designed to provide relevant information and meaningful opportunities for participation to each stakeholder group, proportionate to the Project's scale, Category A classification, and the range of impacts identified in the Supplementary ESIA.

All engagement activities will be inclusive and accessible. Advance notice of not less than 14 calendar days will be provided for any in-person consultation event, with materials disclosed in Kazakh, Russian, and Uzbek (where applicable). Accessible formats (large print, simplified summaries, visual materials) will be provided where needed, and verbal explanations will be given at consultations to support stakeholders with limited literacy.

Specific engagement arrangements will apply to high-vibration activities. Residents within 300 m of piling, dynamic compaction, vibratory rolling or other high-vibration works will receive at least five working days' advance notice. Notices will be provided in Kazakh and Russian, and in Uzbek where this is needed to ensure that affected residents can understand the information. Each notice will identify the planned activity and timing and provide the name and direct contact details of the Project's community liaison officer responsible for vibration-related concerns and damage claims. The EPC Contractor and community liaison officer will issue the notices before work begins at each relevant location, in accordance with the SEP and grievance mechanism.

Feedback from all consultations will be systematically recorded and reviewed by KTZ and the ESIA/ESMP team. Stakeholder opinions and concerns are documented and tracked, and responses communicated through a 'You Said / We Did' process (see Annex C). Feedback is recorded within five working days of each engagement activity; the You Said / We Did matrix is updated monthly by the CLO as part of the monthly engagement summary, and the updated matrix is disclosed following each major consultation round (Table 11).

Table 5 below sets out the planned stakeholder engagement activities. The Timing column specifies the frequency of each recurring activity. Activities linked to Project milestones or events (disclosure, high-vibration works, LARP and BAP milestones, and operational triggers) are undertaken each time the relevant milestone or event occurs.

Table 5: Stakeholder Engagement Plan

Activity	Objective	Target Group	Timing	Responsibility
ESIA and ESMP Disclosure	Disclose the ESIA, ESMP and supporting plans; obtain stakeholder comments; and demonstrate how comments have been considered.	Affected communities; PAPs; district and oblast akimats; relevant national authorities; lenders; NGOs; and other interested parties.	October–November 2026, during construction. Additional disclosure and consultation will be undertaken where material design or Project changes could result in new or significantly different impacts.	KTZ E&S Team, supported by the CLO and specialist consultants. ADB, IFC and AIIB are responsible for disclosure through their respective portals, as applicable.
Community Consultation Sessions	Present ESIA findings; explain mitigation measures and Project commitments; collect structured feedback; and implement the "You Said / We Did" process.	Affected residents in the four districts with affected communities; PAPs; women's groups; vulnerable households; and other locally	During ESIA disclosure and at least every six months during active construction. Additional sessions will be held when material changes, emerging impacts or grievance trends require further	KTZ Project Manager; KTZ E&S Team; CLO; and relevant specialist consultants, in coordination with district akimats.

Activity	Objective	Target Group	Timing	Responsibility
		affected stakeholders.	engagement. At least 14 calendar days' advance notice will be provided. Sessions may be held as open community meetings or as public hearings under national legislation.	
Advance Vibration and Noise Notifications and Briefings	Explain planned high-vibration or high-noise activities, anticipated impacts and mitigation measures; provide contact details for vibration concerns and damage claims; and distribute advance notices. Notices will be delivered door-to-door to properties within 30 m of the works and posted on akimat noticeboards for other properties within 300 m.	Residents and property owners within 300 m of high-vibration works, with specific attention to properties within 30 m of the alignment and sensitive locations such as Ushagash and Maktaaral.	At least five working days before piling, dynamic compaction, vibratory rolling or another high-vibration activity begins at each work front.	EPC Contractor ESHS Manager and CLO, with oversight by the KTZ E&S Team. Notices will be provided in Kazakh and Russian, and in Uzbek where required to ensure affected residents understand the information.
Targeted Engagement with PAPs	Explain LARP eligibility, entitlements, compensation and grievance procedures; verify land and asset information; address compensation queries; and monitor livelihood restoration.	All PAPs and severely affected households, with tailored engagement for female-headed households and vulnerable PAPs.	Before land possession, displacement, restriction of access or commencement of construction on affected land; throughout compensation and relocation; and during livelihood-restoration monitoring. Verification sessions will be held at defined LARP milestones and whenever discrepancies are identified.	KTZ Social Team; CLO; LARP consultants; and district akimat land-relations specialists.
Women-Only Consultation and Focus Groups	Provide a safe and accessible setting for women to raise concerns; identify gender-specific impacts and barriers; and discuss community safety, access, employment, labour conditions and access to the	Women in affected settlements, including female-headed households, vulnerable women and female workers.	During each community consultation round (i.e. at least every six months during active construction), with additional sessions where women are underrepresented, face barriers to participation or request separate engagement.	Female CLO and female E&S or social specialist, supported by appropriate community intermediaries. Sessions will be held separately from general community

Activity	Objective	Target Group	Timing	Responsibility
	grievance mechanism.			meetings where appropriate.
Engagement with Vulnerable Groups	Provide tailored and accessible engagement for people who may face barriers to receiving information, participating in consultations or using the grievance mechanism.	Vulnerable households identified through the socioeconomic baseline and ongoing stakeholder mapping, including older people, persons with disabilities, low-income PAPs, agricultural day labourers and households requiring Uzbek-language engagement.	Aligned with the community consultation and LARP schedules (at least every six months during active construction), with additional individual or small-group engagement whenever participation barriers or specific needs are identified.	CLO; KTZ social staff; specialist consultants; and trusted community intermediaries, where appropriate.
Biodiversity Stakeholder Consultation	Consult on BAP design and implementation; coordinate biodiversity mitigation and offset measures; and disclose and discuss relevant monitoring results.	ACBK; relevant environmental and protected-area authorities; and reservoir users and fishing or herding groups identified through stakeholder mapping.	During BAP preparation; at relevant BAP implementation and monitoring milestones; and whenever monitoring findings, incidents or proposed corrective actions require consultation.	KTZ E&S Team and biodiversity specialists, in coordination with ACBK and the relevant authorities. Bird-flight diverters and pole insulation will be installed by KTZ on the overhead lines under its management, including at the Shardara Reservoir.
Worker Induction, Consultation and Code of Conduct	Inform workers of occupational health and safety requirements, labour rights, expected conduct, community-relations requirements, SEA/SH prohibitions and the worker grievance mechanism.	All EPC Integra personnel, subcontractor workers and KTZ site staff.	Upon recruitment and before site access; refresher training at least every six months; and additional briefings following material changes, incidents, identified non-compliance or assignment to new tasks.	EPC Contractor ESHS Manager and HR Team, with oversight by the KTZ E&S Team.
Operational Community Meetings	Maintain engagement after the railway becomes operational and address residual concerns relating to	Residents and land users in the four districts with affected communities, together with the	Annually in each of the four districts during the first three years of operation and every three years thereafter, subject to more	KTZ Operational CLO and KTZ E&S Team, in coordination with the relevant district akimats.

Activity	Objective	Target Group	Timing	Responsibility
	noise, vibration, fencing, crossings, access and community safety.	relevant local authorities.	frequent engagement where monitoring results, grievances or operational changes indicate a need.	
Priority-Community Disclosure Consultation	Consult the communities identified by operational noise modelling and vibration screening as requiring priority engagement; explain location-specific impacts and mitigation measures; and obtain feedback before relevant works proceed.	Residents in the six priority receptor areas identified in the Supplementary ESIA: Maktaaral; Erdaulet/Aktas; Kūriş; Ushagash; Sarızhyлга–Bereke; and Shyrildak–Zhabaitobe.	Before and during Supplementary ESIA disclosure, and again before relevant construction activities begin at each location.	KTZ E&S Team; CLO; ESIA Team; and EPC Contractor, as relevant to the stage of engagement.
Operational-Phase Re-Engagement Triggers	Undertake targeted engagement in addition to routine operational meetings when an event, monitoring result or Project change could materially affect stakeholders.	Communities near the relevant location; affected individuals or resource users; and relevant government, emergency-response or technical authorities.	Promptly following: a material design or operational change; a noise or vibration exceedance at a sensitive receptor; a hazardous-cargo or significant safety incident; confirmed mortality of a globally threatened species; failure of a mitigation measure; repeated or escalating grievances; or a significant access, crossing or community-safety problem.	KTZ Operational CLO and KTZ E&S Team, with participation by relevant technical specialists, authorities and emergency services.

6.1 Procedure for Consultation on Irrigation Structures and Agricultural/Livestock Crossings

Consultations during ESIA and LARP preparation repeatedly identified the dimensions, number, and location of agricultural and livestock crossings (underpasses and overpasses) and the restoration or relocation of irrigation structures (including the LOTOK channel) as priority concerns for affected farmers and herders. Because these are design-dependent features that directly affect agricultural access and livelihoods, the following structured consultation procedure applies to each affected crossing and irrigation structure, in addition to the general engagement activities in Table 5 and the Grievance Redress Mechanism. The procedure gives effect to the meaningful-consultation requirements of ADB SPS (2009), IFC PS1 and PS5, and AIIB ESS1 and ESS2.

Step 1 — Design outcome. Following consultation at Oshakty, Bereke, and the Sattarov area, the proposed crossing provision was reviewed against the final design. The final design includes 4.0 × 2.5 m livestock/agricultural underpasses at KM 22.9, KM 42.8, and KM 55.1 (at KM 55.1 the design register records a 4.0 × 2.5 m structure, but the signed consultation minutes of 6 March 2026 indicate that technical constraints may limit the effective clear height to approximately 2 m; the as-built dimensions and practical suitability will be verified before operation); however, these do not correspond directly

to all locations proposed during consultation. In particular, the requested 4.0×2.5 m Bereke crossing at PK 365+09 (approximately KM 36.5) is not included in the final design. In the Sattarov/Oshakty area, a 4.0×2.5 m livestock passage is provided at KM 42.8; the request for an additional 4.0×2.5 m crossing at approximately KM 44.8 (PK 448+00 to PK 449+00) was not accepted on design grounds, with KM 42.8 identified as the alternative crossing point; the existing structure at approximately KM 44.6 is not suitable for cattle passage, with alternative cross-corridor access available through the KM 42.8 passage and the railway overpass at approximately KM 46.3. The live commitment is therefore to verify the adequacy and practical accessibility of the as-built crossing arrangements with affected communities before operations and to provide the outcome in writing to the relevant akimat and communities. For any irrigation structure or other crossing feature that remains subject to detailed construction-stage confirmation, the CLO, supported by the EPC Contractor, will notify affected land users (by direct contact, by telephone or in person, with the land users identified in the LARP census and akimat land records, supported by notices on okrug noticeboards and in the rural okrug WhatsApp groups), the relevant rural okrug, and the District Akimat of the proposed arrangement, giving not less than 14 calendar days' notice of consultation. Consultation will be held as an on-site or okrug-level meeting with the affected land users; a formal public hearing is not required.

Step 2 — Pre-operational verification. Before operational handover, KTZ commissions a joint verification of the as-built crossing provision against the design and the consultation record, consistent with ESMP commitment C-SEV-01. Where a crossing or irrigation structure remains subject to consultation, the proposed dimensions and locations are presented at okrug-level sessions in plain-language and visual form (drawings and kilometre-post references), and structured feedback is collected from affected farmers, herders, and irrigation users — including the number of households and livestock served and the adequacy of the proposed structures for agricultural machinery and livestock movement. Women and vulnerable land users are engaged through the targeted measures set out elsewhere in this Section.

Step 3 — Joint site verification and corrective measures. Where the pre-operational verification identifies a material connectivity deficiency, or where proposed dimensions or locations for a structure not yet finalized are contested, KTZ, the EPC Contractor, the District Akimat, and representatives of affected users undertake a joint site visit to verify livestock and machinery movement requirements, irrigation alignments, and access needs at the specific kilometre post, and agree any corrective measures required, consistent with ESMP commitment C-SEV-01. Corrective measures will be proportionate to the deficiency confirmed and may include, for example: improvement of approaches, surfacing, drainage or lighting at existing structures; adjustment of fencing and access gates so that they connect with the passages; signage and designated livestock routes; or, where no practicable alternative exists, modification of an existing structure or provision of an additional crossing.

Step 4 — Written confirmation. KTZ issues written confirmation of the verification outcome and any corrective measures to the affected residents and the District Akimat before operational handover (or, for structures not yet finalized, before the relevant works commence). Where a request cannot be accommodated, the written response sets out the supporting technical reasoning.

Step 5 — Irrigation restoration and re-survey. For irrigation structures, the EPC Contractor restores or reconstructs affected canals, pipelines, drainage, and water-access infrastructure in coordination with local authorities and irrigation users, providing temporary bypasses where feasible to maintain water access during construction. Land-area and irrigation re-surveys committed during consultation (for example, the 31 irrigated plots in Shablan Dildabekov okrug) are completed and the results provided in writing to affected PAPs and the akimat.

Step 6 — Logging, tracking, and closure. Each commitment is logged in the GRM and the You Said / We Did matrix (Annex C), tracked to closure with photographic and documentary evidence, and

reported in the monthly engagement summary and the semi-annual E&S monitoring reports. Outstanding items are carried forward until verified complete.

7. Stakeholder Engagement to Date

7.1 National Consultations (2023)

Formal public consultation processes were initiated in 2023 as part of the national OVOS/EIA (Otsenka Vozdeystviya na Okruzhayushchuyu Sredu) proceedings required under the Environmental Code of the Republic of Kazakhstan (Code No. 400-VI ZRK of 2 January 2021).

At the public hearing held on 14 April 2023 at Abay village (Keles District), residents of Abay and adjacent settlements raised categorical objections to the proposed alignment, which passed through the Keles River valley close to settlement areas. The Akimat of Keles District tabled an alternative route running approximately north-west of the proposed alignment and roughly 15 km longer overall.

Because the Project's technical and economic feasibility study (TEO) had already been confirmed by Government Resolution and a First Deputy Prime Minister direction, the hearing outcome was escalated by KTZ to national level. At a working meeting chaired by First Deputy Prime Minister R.V. Sklyar, a protocol decision was taken to dispatch officials from the Apparatus of the Government to Keles District to investigate in the field.

A Working Group on the alignment convened on site on 22 April 2023, chaired by Mr E.K. Uskenbayev of the Apparatus of the Government and attended by KTZ, the Oblast Maslikhat and Executive Body, and the designer (Transproekt-K). Recognising the high risk of further community protest, the Working Group instructed Transproekt-K to develop a new alignment for the affected section in agreement with the Keles District Akimat, and instructed KTZ to amend the project technical assignment accordingly.

The revised alignment was prepared by Transproekt-K and agreed with the Akim of Turkistan Region, the Akimats of Keles and Saryagash districts, and KTZ. It bypasses the Keles River valley between Abay and Kyzylasker villages, with the main route running westwards along the Kuryukkeles River valley. The corrected alignment retained the Project staging structure but increased the total alignment length within Kazakhstan.

Confirmatory public hearings were held on 20 and 21 July 2023 in four districts of Turkistan Region (Saryagash, Keles, Shardara/Zhetysay, and Maktaaral). The hearings confirmed the corrected final alignment.

7.2 NGO Consultations

Biodiversity consultation has been undertaken with conservation organizations, government authorities, academic and scientific institutions, and recognized species specialists. Details are presented in Table 6.

Table 6: The Stakeholders consulted/approached as part of the Project ESIA and Critical Habitat Assessment process

Organization / Expert	Type	Date	Purpose
Shardara Reservoir Management Authority	Email correspondence and formal letter request - no response	February/March 2026	Reservoir operations, water hydrology aquatic habitat
Aral-Syrdarya Basin Inspection (Committee for Water Resources)	Email correspondence and formal letter request - no response	February/March 2026	Water management, basin ecology, fisheries regulation

Organization / Expert	Type	Date	Purpose
Committee of Forestry and Wildlife (Ministry of Ecology and Natural Resources)	Email and meeting correspondence with Mr Musaliev - Regional Head	March 2026	Protected areas, wildlife regulation, habitat oversight
Kazakhstan Fisheries Research and Production Center (KazNIIRKh)	Email correspondence and formal letter request - no response	February/March 2026	Fisheries, aquatic ecology, reservoir fish and Sturgeon
RSE Kazhydromet	Email correspondence and formal letter request - no response	February/March 2026	Hydrology, water levels, climate and meteorological data
Institute of Geography and Water Security	Email correspondence and formal letter request - no response	February/March 2026	Hydrology, water balance, climate–water interactions
Al-Farabi Kazakh National University – Department of Zoology	Email correspondence - no response	February/March 2026	Herpetology, specifically desert reptiles
Auezov South Kazakhstan University – Ecology Department	Email correspondence - no response	February/March 2026	Regional reptile knowledge
Ministry of Water Resources and Irrigation	Email correspondence and formal letter request - no response	March 2026	Water governance, basin management
ACBK	Emails, meetings, site surveys and data sharing	2025 and 2026 ongoing	Biodiversity data, particularly birds
Victoria Kovshar – professional ornithologist	Email and meeting correspondence and sharing of data.	2025 and 2026 ongoing	Bird data
Eurasian Regional Association of Zoos and Aquariums	Email and meeting correspondence and sharing of data.	March 2026	Syr Dara Shovelnose sturgeon
Tennessee Aquarium Conservation Institute (Bernie Kuhajda)	Email and meeting correspondence and sharing of data.	March and April 2026	As above

As noted in the ESIA, biodiversity-related consultation has primarily focused on informing the Critical Habitat Assessment, Impact Assessment, and associated mitigation measures. Initial engagement on potential biodiversity offsets and Additional Conservation Actions (ACAs) has been undertaken and has informed the measures presented in the Preliminary BAP. However, the rapid pace of construction

and the retrospective nature of the ESIA have limited early consultation, including engagement with KTZ regarding biodiversity commitments and offset funding. Further consultation will therefore be required during preparation of the Final BAP.

7.3 March 2026 Access-Specific Design Consultations

In addition to the national hearings and NGO/biodiversity consultations described above, the Supplementary ESIA records two further on-site consultations held on 6 March 2026, focused specifically on livestock and agricultural access at proposed crossing locations:

- Shyryldak/Zhabaitobe (approximately 50 residents) — on the livestock route at approximately KM 22.9.
- Birtilek (approximately 50 residents) — on the crossing at approximately KM 55.0–55.1.

These consultations informed the subsequent review of livestock and agricultural crossing provision. The final design includes 4.0 × 2.5 m livestock passages at KM 22.9 and KM 55.1 (at KM 55.1 the design register records a 4.0 × 2.5 m structure, but the signed consultation minutes of 6 March 2026 indicate that technical constraints may limit the effective clear height to approximately 2 m; the as-built dimensions and practical suitability will be verified before operation), together with the KM 42.8 passage in the Sattarov/Oshakty area; however, not all locations proposed by residents were adopted, and the remaining commitment is pre-operational verification of the adequacy and practical accessibility of the as-built crossing arrangements (see Section 6.1).

7.4 ESCA Consultations (November 2025 and January 2026)

The ESCA team also engaged public authorities, affected communities and workers during its field investigations in November 2025 and January 2026. This engagement was undertaken to inform the compliance audit rather than as part of the formal ESIA disclosure process. It is included here because the findings contribute to the Project's stakeholder engagement record and have informed the engagement and grievance-management measures in this SEP. The engagement is documented in the ESCA (Version 2.0, 3 June 2026) and is not included in participation totals reported for formal ESIA consultations.

Public authorities. Meetings were held with the Turkistan Oblast Akimat and the District Akimats on land acquisition, compensation, complaint handling and regulatory oversight; with Kazvodhoz (November 2025) on reservoir operations, water-level management, irrigation and water distribution, and sanitary water protection zones, including confirmation that the alignment was locally shifted by approximately 800 m within the reservoir area on hydrological grounds; and with the Department of Natural Resources Management of Turkestan Region (November 2025) on borrow-pit permitting and the consultation process associated with it.

Affected communities. Consultations were held in January 2026 with community representatives and project-affected persons at Akuy and Dildabekova, including former owners of plots acquired for the Project. Participants were generally positive about the Project and raised the importance of maintaining agricultural crossings, underpasses and access routes for farming activities.

Workers. Consultations were held with direct and subcontracted workers at construction sites and accommodation facilities in November 2025 and January 2026, including the workforces of two subcontractors mobilized in the Project area — Syganak Group at Maktaaral Station and EST Construction at Akuy Station — covering employment terms, working hours, accommodation and welfare, occupational health and safety, and awareness and accessibility of the worker grievance mechanism.

The ESCA notes that, as these consultations were conducted in an active construction environment, some workers and affected persons may have been reluctant to raise concerns openly because of cultural norms, perceived power dynamics, or the presence of contractor or authority representatives.

The absence of reported concerns is therefore not treated in this SEP as evidence that none exist, and the anti-reprisal and confidential-intake measures in Section 8 are applied on that basis.

7.5 ESIA Community Consultations

In addition to the national EIA consultations, the ESIA Team completed six community consultation sessions between 19 and 21 May 2026 at locations within the Saryagash, Keles, Zhetysai and Maktaaral districts along the alignment. The aim of the consultations was to present the preliminary findings of the Supplementary ESIA, the corresponding findings of the LARP, and the grievance redress mechanism applicable to the project, and to invite community feedback. All participants were provided with copies of an environmental project information brochure (ePIB) and the LARP information brochure. The consultations were facilitated by the ESIA and LARP specialist team, with representatives of KTZ and the Lenders (ADB, AIIB and IFC) in attendance where applicable.

The schedule, venues and rationale for selection are set out in the table below, followed by a summary of attendance and a detailed account of each consultation event. The consolidated feedback and corresponding responses are recorded in Table 9.

Community feedback gathered through the consultation program has been taken into account in the project design and in the Supplementary ESIA and ESMP. The principal instances where input has been accommodated, or a specific response committed, are summarized below and cross-referenced to the relevant part of the report; the full record of issues and responses is in Table 9.

- Alignment and livestock movement (Keles district). Input from the July 2023 alignment-confirmation consultations on movement between and within pasture lands informed adjustments to the alignment in Keles district.
- Cross-corridor passage and agricultural underpasses. Concerns about livestock and agricultural access informed review of the crossing provision. The final design includes 4.0 × 2.5 m livestock/agricultural underpasses at KM 22.9, KM 42.8, and KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1), but these do not correspond directly to all locations requested during consultation: the requested Bereke crossing at PK 365+09 (approximately KM 36.5) is not included as a 4.0 × 2.5 m passage, while the Sattarov/Oshakty area is served by the KM 42.8 passage and alternative cross-corridor access. KTZ has committed to pre-operational verification of the adequacy and practical accessibility of the as-built crossing arrangements, with corrective measures where a material connectivity deficiency is confirmed (Supplementary ESIA Section 8.4.1, Agriculture / AF001; ESMP commitment C-SEV-01).
- Construction noise and vibration. Targeted construction noise and vibration management is committed at the six community locations identified through the technical assessment, including a pre-construction baseline condition survey at Maktaaral, where relevant works have not commenced, and current-condition (as-is) surveys at the earliest opportunity at Ushagash and other locations where works are already underway, together with vibration monitoring (Supplementary ESIA Section 8.4.3; ESMP).
- Air quality. Operational air quality monitoring at Akuy village has been included in response to community input (Supplementary ESIA Section 8.4.4; Operational ESMP).
- Irrigation supply and the LOTOK channel. Commitments to survey, verify, compensate and restore interrupted irrigation supply — including the LOTOK channel relocation at Atakent and the irrigation/water-pipeline matters raised at Birlik (Keles) — have been incorporated (Supplementary ESIA Section 8.4.1; ESCA Corrective Action Plan; Operational ESMP monitoring OESMP-13).
- Land-area verification. The request by PAPs at Birlik (Shablan Dildabekov, Zhetysai) for re-survey of the 31 affected irrigated plots has been committed, with written results to PAPs and

the local akimat (LARP; Supplementary ESIA Section 8.4.2). Any adjustment to compensation will be limited to discrepancies between the decreed and re-surveyed areas that are confirmed by the re-survey; where no discrepancy is confirmed, no additional compensation is payable and the results will be explained to the PAPs in writing.

- Grievance mechanism. Feedback at Erdait on the effectiveness of grievance channels has informed strengthening of the GRM, including reinforced awareness measures and a review of response and closure times (Section 8.14).

Where issues require further investigation or detailed design, the specific commitment and the route to resolution are recorded and logged in the Grievance Redress Mechanism for tracking to closure.

Table 7: Schedule and Venues of Community Consultations, 19–21 May 2026

Nº	Date	District	Time and Venue	Rationale for Venue Selection
1	19 May 2026	Saryagash	14:00 Primary school, Erdait village, Darbaza rural okrug; 16:30 House of Culture, Ak Ui village, Kurkeles rural okrug	Erdait is the location of the train station to be constructed and the focus of the most significant LARP and ESIA impacts. Ak Ui is the most populous settlement in Saryagash located close to the railway at a reasonable distance from Erdait, allowing residents of other Saryagash settlements an opportunity to participate.
2	20 May 2026	Keles	10:00 Local Akimat, Oshaqty settlement, Oshaqty rural okrug; 14:00 Local Akimat, Birlik settlement, Birlik rural okrug	Oshaqty and Birlik are the administrative centers of rural okrugs comprising 13 and 7 settlements respectively, most of which are located near the construction works. Pre-consultation socio-economic surveys indicated that the majority of unresolved issues originated from PAPs in these settlements. The administrative centers also provided the most accessible locations for transport within the affected areas.
3	21 May 2026	Zhetysai and Maktaaral	10:00 Local Akimat, Birlik settlement, Shablan Dildabekov rural okrug (Zhetysai); 14:00 Local Akimat, Atakent town, Atakent and Maktaaral rural okrug	Birlik is the administrative center of the Shablan Dildabekov rural okrug, which comprises 13 settlements. Atakent is the location of the existing train station to be reconstructed under the project, with associated acquisition of private land. At the time of consultation, only preparatory works were underway in Atakent and the land acquisition process was ongoing.

The schedule was agreed with KTZ, the local authorities and the Lenders approximately two weeks in advance of the consultations. Announcements were made by the local akimats on notice boards in the akimat halls and entrance areas, and through internal WhatsApp group channels used by the rural okrug administrations to communicate with their residents. In addition, the ESIA team contacted previously surveyed PAPs directly through social media and telephone. The akimats and KTZ advised that attendance was likely to be limited because residents were engaged in seasonal field work, women were typically engaged in bazaar activities, and the working-age population commuted daily to Shymkent and other nearby cities. Attendance therefore comprised predominantly PAPs with unresolved issues and elderly retired residents.

Attendance at the six consultation events is summarized in Table 8. The attendance records indicate a marked gender imbalance at most events. To address this gap, the female E&S specialist undertook additional outreach to women who did not participate in the public meetings. This included explaining the consultation process, seeking their views on Project impacts and discussing opportunities to strengthen women's participation.

Through this additional outreach, three women were engaged in Oshaqty, approximately ten in Zhetysay and nine in Atakent. Some participants chose not to provide their names or contact details. These women are reported separately and are not included in the attendance totals for the formal consultation events.

Barriers to women's participation identified during the consultation process included local social norms concerning participation in mixed-gender public meetings, seasonal agricultural work, bazaar activities and daily commuting to Shymkent and other urban centres. These constraints were more evident in rural settlements than in urban areas. The SEP therefore provides for women-only sessions and other targeted engagement measures where women are underrepresented or face barriers to participation.

Table 8. Attendance at May 2026 Community Consultation Events

Consultation Location	District	Recorded Attendance	Recorded Female Participants	Additional Women Engaged Separately
Erdaut	Saryagash	14	1	—
Ak Ui	Saryagash	18	1	—
Oshaqty	Keles	21	Not reported	3
Birlik	Keles	18	Not reported	—
Birlik	Zhetysay	16	3	Approximately 10
Atakent	Maktaaral	At least 19	5	9
Total		106	At least 10	Approximately 22

Note: Women engaged separately did not participate in the formal public meetings and are therefore not included in the recorded attendance totals. Some declined to provide their names or contact details. The sex-disaggregated attendance figures for Oshaqty and Birlik in Keles District were not reported in the available records.

At each consultation event, the meeting was opened by the local akimat official, who welcomed the audience and introduced the ESIA specialist team and any Lender representatives in attendance. The ESIA team then presented the main purpose of the meeting – namely, the disclosure of the substantially finalized LARP and ESIA documents in accordance with the Lenders' E&S policies, as a precondition for KTZ to access the project loan – followed by an interactive session on the principal E&S impacts and the proposed mitigation measures.

Comments, concerns and questions raised during the consultation events were recorded and reviewed by the ESIA and LARP teams. Where relevant, these have informed revisions to the ESIA and associated mitigation measures, the LARP and stakeholder engagement measures; issues requiring individual follow-up are recorded and managed through the applicable grievance mechanism. The detailed accounts of each event, including the principal issues raised and responses provided, are presented below.

Erdaut village, Saryagash district, 19 May 2026. A consultation event was held at the village primary school, attended by 14 residents including project-affected persons from Erdaut and the wider Darbaza rural okrug. Erdaut is the location of the proposed train station and is therefore the focus of the most significant LARP and ESIA impacts within Saryagash district. The principal issues raised by participants related to: (i) construction nuisance from subcontractor activity, with residents reporting dust, noise and concerns over child safety arising from 24-hour working with limited on-site supervision and inadequate enforcement of safety controls; (ii) the effectiveness of the existing

grievance redress channels, which residents considered insufficient to secure timely resolution of urgent issues; and (iii) specific unresolved cases requiring individual follow-up, including a PAP who has disputed the valuation of his acquired land and is pursuing the matter through the courts, and a PAP who identified from the Erdaut development masterplan that approximately half of the territory and facilities of her kindergarten would be expropriated under the railway sanitary protection zone, raising concerns over the future viability of the facility.

Akuy village, Saryagash district, 19 May 2026. A consultation event was held at the village house of culture, attended by 18 residents and opened by the Deputy Akim of the village okrug. The event covered the LARP findings, the grievance redress mechanism, and the principal ESIA findings on noise, dust, safety and biodiversity (including the Shardara Reservoir crossing). No project-affected persons were present at this event and participants stated that no significant environmental or social impacts had been observed at the current progress stage of the project. Following a structured prompt to elicit issues of community interest, the following questions and concerns were raised:

- the type of motive power proposed for the railway and, specifically, whether the line could be operated using electric rather than diesel locomotives, with associated questions on the scale and health implications of diesel exhaust emissions;
- the monitoring arrangements for air pollution given the projected throughput of up to 46 trains per day passing populated areas;
- the provision of stock-proof fencing along the alignment to prevent livestock entering the railway corridor and the associated risk of loss of livestock and liability for owners;
- the status of a third station, reported to have been mentioned at earlier consultations, distinct from any onward extension of the line toward Zhetisay; and
- the arrangements for waste segregation during construction and operations and the prevention of soil and water pollution from project waste streams.

Responses to each question were provided at the event by the specialist team. Responses, and the corresponding SEP/ESIA references where each issue is addressed, are recorded in Table 9 below. The feedback is summarized as follows:

Oshakty village okrug and Birlik village, Keles district, 20 May 2026. Separate site-based consultations were held with residents of settlements within Oshakty village okrug and with residents of Birlik village. Approximately 20 people attended each event. Unlike participants at the Akuy event, residents of Oshakty and Birlik raised several unresolved concerns, principally relating to:

- the dimensions and number of agricultural underpasses provided in the current design across Oshakty village okrug. Residents reported that several of the underpasses currently incorporated in the design are sized for drainage purposes (typically 2 × 2 m or smaller) rather than for cattle movement, and are too narrow, too long, and too dark to be used by livestock in practice. Residents reported widespread livestock grazing across the alignment, with common underpasses shared by multiple settlements and used by livestock several times per day. Specific design proposals were tabled by residents, including:
 - a cattle underpass of 4 × 2.5 m at approximately PK 365+09 to serve approximately 400 households in Bereke settlement, in place of the 2 × 2 m structure currently in the design;
 - two cattle underpasses of 4 × 2.5 m at approximately PK 408+09 and at a location between PK 448+00 and PK 449+00 to serve three settlements in the Sattarov area, with an alternative option referred to by residents at PK 428+00 that requires further verification;

- the status of correspondence between local authorities and KTZ on the underpass dimensions, in particular a letter from the local Akimat dated 6 April 2026 to which residents reported a same-day response from KTZ stating that the proposed underpass dimensions could not be accommodated, without supporting reasoning; and
- verbal commitments reportedly made by representatives of KTZ and Turkestan regional authorities ahead of a recent regional summit indicating that design rearrangements would be considered after construction milestones had been met. Residents expressed a clear preference for written confirmation of design changes prior to the relevant construction activity.

At Birlik village, separate concerns were raised by project-affected persons whose land has been acquired for the project. The principal issues raised were:

- damage to the irrigation network resulting from the project, which has rendered land donated to the project unproductive for two cultivation seasons while rental obligations have continued, with consequent loss of agricultural income;
- the status of a water pipeline previously committed as part of the project mitigation package, which had not been installed at the time of the consultation;
- the height of the embankment in the vicinity of approximately PK 606+00 in relation to the proposed overcrossing for agricultural vehicles and an associated crossing for livestock; and
- a broken concrete (LOTOK) irrigation pipeline in Ushagash settlement, approximately 12 km from Birlik, which has prevented agricultural cultivation, together with reports of vibration-related cracking at one or two houses in Ushagash potentially associated with the project.

Birlik village, Shablan Dildabekov rural okrug, Zhetysai district, 21 May 2026. A consultation event was held at the local akimat, attended by 16 residents from settlements within the Shablan Dildabekov rural okrug (which comprises 13 settlements). The principal issue raised, by both residents and the local authorities, was a lack of confidence among PAPs that the areas of land acquired correspond to the areas stated in the akimat decrees. PAPs requested that geodesists from the contractor or subcontractor attend site and undertake survey measurements on 31 affected irrigated plots located within the Shablan Dildabekov rural okrug boundaries, to verify the acquired areas against the decreed areas. This concern has been logged in the project Grievance Redress Mechanism and will be addressed through a re-survey of the affected plots and a written response to PAPs and the local akimat setting out the survey results.

Atakent town, Maktaaral district, 21 May 2026. A consultation event was held at the local akimat, attended by at least 19 residents from Atakent town and the Atakent and Maktaaral rural okrugs. Atakent is the location of the existing train station to be reconstructed under the project. At the time of the consultation, only preparatory works had commenced and the land acquisition process was ongoing; the land acquisition arrangements are also expected to be revised in connection with the required relocation of the existing concrete (LOTOK) irrigation water channel. Consequently, the number of issues raised was limited and related primarily to land acquisition and compensation arrangements. The issues raised have been logged in the project Grievance Redress Mechanism and will be addressed through the LARP process and the project Community Liaison Officer.

The concerns raised at Erdauit, Oshakty, Birlik (Keles), Ushagash, Birlik (Zhetysai) and Atakent will be addressed as follows. The construction nuisance, child safety and supervisory concerns raised at Erdauit will be addressed through reinforced contractor oversight, dedicated community liaison cover during 24-hour working periods, and a review of the effectiveness of the existing GRM channels in the affected settlements; the individual cases will be progressed through separate investigations under the GRM. The crossing proposals raised in Oshakty village okrug have been reviewed against the final design. The final design includes 4.0 × 2.5 m livestock/agricultural passages at KM 22.9, KM 42.8, and

KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1), but not all requested locations were adopted: specifically, the requested Bereke crossing at PK 365+09 (approximately KM 36.5) is not included as a 4.0 × 2.5 m passage. In the Sattarov/Oshakty area, the final design provides the 4.0 × 2.5 m passage at KM 42.8 and alternative cross-corridor access; KTZ will verify the adequacy and practical accessibility of the as-built arrangements before operations and provide the outcome in writing to residents and local authorities. The status of the water pipeline and irrigation network mitigation at Birlik (Keles) will be confirmed in writing through the project Community Liaison Officer and incorporated into the LARP monitoring framework. The reported vibration damage at Ushagash will be investigated through the vibration monitoring program committed under Supplementary ESIA Section 8.4.3 and the damage procedure in Section 8.6, with current-condition (as-is) surveys of affected structures undertaken at the earliest opportunity and before further vibration-generating works in proximity, where practicable. The land-area verification request raised at Birlik (Zhetysai) will be addressed **through a geodetic re-survey** of the 31 affected irrigated plots, undertaken by a licensed geodetic surveyor engaged by the EPC Contractor (as requested by the PAPs), an independent licensed surveyor, or the state land cadastre service, in the presence of the PAPs and a representative of the Zhetysay District Akimat land relations department, with results communicated in writing to PAPs and the local akimat. Any correction to the decreed areas is made by the relevant Akimat; KTZ will request the correction where a discrepancy is confirmed and inform the PAPs of the outcome in writing. The land acquisition and compensation concerns raised at Atakent will be addressed through the ongoing LARP process and reflected in the revised land acquisition arrangements associated with the LOTOK irrigation channel relocation. All concerns recorded in this section have been logged in the project Grievance Redress Mechanism and will be tracked to closure under the GRM procedures described in Section 8.

7.6 Key Issues Raised and Responses Committed

The principal concerns raised across all consultations are summarized below, with cross-references to the management measure committed:

- Construction noise and vibration (Ushagash, Maktaaral): continuous PPV monitoring, method statement controls, and advance notification are committed in the Supplementary ESIA and the construction-phase Vibration Management Plan. Condition surveys (pre-construction baseline at Maktaaral, where works have not commenced; current-condition (as-is) surveys at the earliest opportunity elsewhere, including Ushagash) and the damage investigation, causation and repair/compensation procedure are set out as a SEP/GRM procedure (Section 8.6).
- Vibration-related property damage (Ushagash): A formal six-step damage investigation and causation procedure is committed, with written determination within 21 working days of any complaint. Where the investigation under Section 8.6 determines, on the basis of the condition survey, vibration monitoring data and, where required, an independent structural assessment, that damage is project-related, KTZ will repair to pre-project condition or provide replacement-cost compensation.
- Livestock and agricultural underpasses (Oshakty/Keles): the crossing proposals raised during consultation have been reviewed against the final design. The final design provides 4.0 × 2.5 m livestock/agricultural passages at KM 22.9, KM 42.8, and KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1); however, the requested Bereke passage at PK 365+09 (approximately KM 36.5) is not included as a 4.0 × 2.5 m structure. KTZ has committed to pre-operational verification of the adequacy and practical accessibility of the as-built crossing provision, with written confirmation to the relevant akimat and communities. This commitment is logged in the GRM and tracked to closure.

- Irrigation network disruption and LOTOK channel (Birlik/Atakent): Survey, verification, and restoration/compensation of disrupted irrigation supply committed, including LOTOK channel relocation at Atakent.
- Land-area re-survey (Birlik/Zhetysai): Re-survey of 31 affected irrigated plots committed, with written results provided to PAPs and the local akimat.
- Operational air quality monitoring (Akuy): Air quality monitoring at Akuy village included in the operational ESMP.
- GRM awareness and responsiveness (Erdaut): Reinforced awareness measures, dedicated CLO coverage, and a review of response and closure times committed.

Table 9: Consultations Summary

Nº	Location and Date	Comment / Concern Raised	Response and Action	ESIA Reference
1	Akui, Saryagash, 19 May 2026	Type of motive power; possibility of electrifying the line; health effects of diesel emissions	Project uses diesel traction; electrification is not within the Project scope and is not planned by KTZ, given the energy deficit in Turkistan Region. Operational air quality monitoring committed at representative receptors.	Section 8.4.4 (Air Quality, Noise); Section 2 (Project Description)
2	Akui, Saryagash, 19 May 2026	Monitoring of air pollution given throughput of up to 46 trains per day	Air quality monitoring at representative sensitive receptors committed throughout construction; operational monitoring under the Operational ESMP.	Section 8.4.3 (Air Quality); Section 9.2.11
3	Akui, Saryagash, 19 May 2026	Provision of stock-proof fencing along the alignment to prevent livestock incursion	Stock-proof fencing along the full Right of Way committed; agricultural underpasses to be provided to maintain livestock movement; inspection and maintenance regime to be established by KTZ.	Section 8.4.4 (Agriculture, AF006)
4	Akui, Saryagash, 19 May 2026	Third station within Darbaza–Maktaaral project (as distinct from any onward extension)	To be confirmed against the current project definition; response to be provided to participants.	Section 2 (Project Description)
5	Akui, Saryagash, 19 May 2026	Waste segregation during construction and operations and prevention of soil and water pollution from waste	Construction Waste Management Plan to be prepared by the EPC contractor; waste hierarchy applied; licensed disposal facilities to be used.	Section 8.4.3 (Waste Management, Soils and Geology)
6	Oshakty village okrug, 20 May 2026	Agricultural underpass at PK 365+09 (Bereke): existing 2 × 2 m structure requested to be enlarged to 4 × 2.5 m to allow livestock movement for ~400 households	The request was reviewed against the final design. A 4.0 × 2.5 m livestock passage is not provided at PK 365+09 (approximately KM 36.5); the final design instead provides 4.0 × 2.5 m livestock/agricultural passages at KM 22.9, KM 42.8, and KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1). KTZ will verify the adequacy and practical accessibility of the as-built crossing arrangements before operations and provide the outcome in writing to	Section 8.4.1 (Agriculture, AF001); Section 9 (GRM)

№	Location and Date	Comment / Concern Raised	Response and Action	ESIA Reference
			residents and the relevant local authority.	
7	Oshakty village okrug, 20 May 2026	Agricultural underpasses at PK 408+09 and between PK 448+00 and PK 449+00 (Sattarov area): structures of 4 × 2.5 m requested to serve three settlements; alternative at PK 428+00 referenced and to be verified	The request was reviewed against the final design. A 4.0 × 2.5 m livestock passage is provided at KM 42.8 in the Sattarov/Oshakty area. The request for an additional 4.0 × 2.5 m crossing at approximately KM 44.8 (PK 448+00 to PK 449+00) was not accepted on design grounds, with KM 42.8 identified as the alternative crossing point. The existing structure at approximately KM 44.6 is not suitable for cattle passage; alternative cross-corridor access is available through the KM 42.8 passage and the railway overpass at approximately KM 46.3. KTZ will verify the adequacy and practical accessibility of these as-built arrangements before operations and provide the outcome in writing.	Section 8.4.1 (Agriculture, AF001); Section 9 (GRM)
8	Oshakty village okrug, 20 May 2026	Correspondence with local Akimat (letter dated 6 April 2026) on underpass dimensions and concern over the supporting reasoning provided in KTZ's response	The design review has been completed. KTZ will provide a written response setting out the final design position, including the treatment of the Bereke and Sattarov proposals, and will subsequently communicate the outcome of the committed pre-operational verification of the as-built crossing arrangements.	Section 9 (GRM)
9	Birlik village, 20 May 2026	Damage to the irrigation network has left land donated to the Project unproductive for two cultivation seasons while rental obligations have continued, with consequent loss of agricultural income	Any reported Project-related damage to crops, agricultural land, irrigation infrastructure or other livelihood assets will be recorded through the Project Grievance Mechanism and investigated and verified, with the CLO coordinating engagement with the affected person. Where Project-related loss or damage is confirmed, restoration and/or compensation will be provided in accordance with the LARP and its Entitlement Matrix. This includes, as applicable, compensation for temporary crop losses, temporary inability to cultivate land, temporary loss of access to land and other temporary livelihood impacts. Implementation and effectiveness of the agreed remedial measures will be monitored through the LARP monitoring framework.	LARP; Section 8.4.2 (Land Take)

Nº	Location and Date	Comment / Concern Raised	Response and Action	ESIA Reference
10	Birlik village, 20 May 2026	Status of a previously-committed water pipeline	The status of the water pipeline will be confirmed in writing through the CLO, together with an installation timetable. Where the pipeline was committed by an Akimat or another party rather than by the Project, KTZ will obtain the status and timetable from that party and communicate it to the PAPs. Responsible: KTZ Social Team and CLO, with the EPC Contractor. Tracked through the GRM and the LARP monitoring framework.	LARP
11	Birlik village, 20 May 2026	Embankment height and the overcrossing/livestock crossing arrangement near PK 606+00	Detailed design to be reviewed; written response to be provided to residents. Responsible: EPC Contractor design team with the KTZ E&S Team; written response issued by the CLO in any event before the relevant works at PK 606+00 commence.	Section 8.4.1 (Design); Section 9 (GRM)
12	Ushagash settlement, 20 May 2026	Broken concrete (LOTOK) irrigation pipeline; reported vibration-related cracking at 1–2 dwellings	LOTOK to be investigated and remediated as required; current-condition (as-is) surveys of affected structures will be undertaken at the earliest opportunity and before further vibration-generating works in proximity, where practicable, under the vibration monitoring program.	Section 8.4.3 (Noise and Vibration, NO004); Section 8.4.2 (Land Take, AF002)
13	Erdait, Saryagash, 19 May 2026	Construction nuisance from subcontractor activity (dust, noise) and child safety concerns associated with 24-hour working with limited on-site supervision and enforcement of safety controls	Reinforced contractor oversight committed; community liaison cover during 24-hour working periods; review of subcontractor compliance with the Construction ESMP including dust suppression, noise controls and traffic/safety management at populated areas.	Section 8.4.3 (Air Quality; Noise and Vibration); Section 8.4.4 (Community Health and Safety); Section 9 (ESMP, GRM)
14	Erdait, Saryagash, 19 May 2026	Effectiveness of existing GRM channels considered insufficient by residents for timely resolution of urgent construction-phase issues	KTZ will provide sufficient resources for effective implementation of the Project GRM, including additional Community Liaison Officer (CLO) capacity where required. CLOs will maintain regular engagement with affected communities, ensure grievances are promptly recorded and investigated, coordinate responses with KTZ and the EPC Contractor, and track grievances through to resolution. Grievances will be acknowledged and responded to within the timeframes established by the Project GRM, with overdue or unresolved cases escalated in accordance with the GRM procedure. GRM performance, including numbers of grievances received, response and	Section 9 (GRM)

№	Location and Date	Comment / Concern Raised	Response and Action	ESIA Reference
			resolution times, outstanding cases and recurring issues, will be monitored and reported through the Project E&S monitoring framework.	
15	Erdaut, Saryagash, 19 May 2026	Individual PAP case (Mr Perneshev): disagreement with land valuation; matter pursued through the courts	Case logged in the GRM for separate investigation; case progressed in parallel with the judicial process; outcome to be reflected in the LARP monitoring framework.	LARP; Section 9 (GRM)
16	Erdaut, Saryagash, 19 May 2026	Individual PAP case: approximately half of the territory and facilities of an existing kindergarten to be expropriated under the railway sanitary protection zone per the Erdaut development masterplan; concern over future viability of the facility	Case logged in the GRM; sanitary protection zone footprint and impacts on the kindergarten to be confirmed against the Erdaut masterplan; reinstatement or relocation options to be considered under the LARP. Responsible: KTZ Social Team and LARP consultants, with the Saryagash District Akimat. KTZ's steps are to: (i) obtain from the Saryagash District Akimat the Erdaut masterplan and the basis on which the sanitary protection zone (SPZ) is shown; (ii) confirm the SPZ required for the railway under national sanitary rules against the final (as-built) alignment, rather than the preliminary masterplan; (iii) confirm whether any part of the kindergarten land or facilities falls within the Project land take or is subject to an SPZ restriction; (iv) only where an impact attributable to the Project is confirmed, address it under the LARP; and (v) provide a written response to the owner. Designation of the SPZ and land-use decisions under the masterplan remain within the competence of the Akimat (Supplementary ESIA Section 1.2).	LARP; Section 8.4.4 (Community Services and Infrastructure); Section 9 (GRM)
17	Birlik (Shablan Dildabekov), Zhetysai, 21 May 2026	Lack of confidence among PAPs that acquired land areas match the akimat decrees; request that contractor/subcontractor geodesists undertake survey measurements on 31 affected irrigated plots within the Shablan Dildabekov rural okrug	Geodetic re-survey of the 31 affected irrigated plots committed; written response to PAPs and the local akimat setting out the survey results and any required adjustments (limited to confirmed discrepancies between the decreed and re-surveyed areas) to the LARP entitlements. Any correction to the decreed areas is made by the relevant Akimat; KTZ will request the correction where a discrepancy is confirmed and inform the PAPs of the outcome in writing.	LARP; Section 8.4.2 (Land Take); Section 9 (GRM)
18	Atakent, Maktaaral, 21 May 2026	Land acquisition and compensation arrangements at the existing Atakent train station,	Land acquisition arrangements to be progressed through the LARP process and revised to reflect the LOTOK	LARP; Section 8.4.2 (Land Take); Section 9 (GRM)

№	Location and Date	Comment / Concern Raised	Response and Action	ESIA Reference
		including the implications of the required relocation of the existing concrete (LOTOK) irrigation channel	channel relocation; issues tracked through the project Community Liaison Officer. The related land-acquisition resolution is issued by the Turkistan Region Akimat; KTZ will follow it up and inform affected persons of its status in writing.	

7.7 Community feedback consideration

Community feedback obtained through the consultation program has informed the project design, mitigation measures, and commitments included in the ESIA, ESMP and LARP. Key examples include:

- **Alignment and livestock movement:** Feedback from affected communities informed alignment refinements in Keles district and the provision of additional measures to maintain livestock access.
- **Agricultural crossings and underpasses:** Concerns regarding livestock and agricultural access informed review of the crossing provision. The final design provides 4.0 × 2.5 m passages at KM 22.9, KM 42.8, and KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1), but not all locations proposed during consultation were adopted; the remaining commitment is pre-operational verification of the adequacy and practical accessibility of the as-built arrangements, with written feedback to affected communities and the relevant akimat.
- **Noise and vibration:** Construction noise and vibration management measures have been incorporated into the ESMP, including a pre-construction baseline condition survey at Maktaaral and current-condition (as-is) surveys at the earliest opportunity at Ushagash and other locations where works have already commenced, together with vibration monitoring.
- **Air quality:** Operational air quality monitoring at Akuy village has been included in response to community concerns regarding railway emissions.
- **Irrigation infrastructure:** Commitments relating to irrigation restoration, the LOTOK channel relocation at Atakent, and water-supply issues raised in Birlik have been incorporated into project mitigation and monitoring measures.
- **Land acquisition:** A re-survey of 31 affected plots requested by PAPs in Zhetysai district has been committed through the LARP process.
- **Grievance management:** Feedback regarding the effectiveness of existing grievance channels has informed measures to strengthen the project GRM and improve response times.

The Issues that require further investigation or detailed design, the specific commitment and the route, are recorded above.

8. Grievance Redress Mechanism

8.1 General

A grievance is an issue, concern, problem, or claim — perceived or actual — that an individual or community group wants resolved. The project-level Grievance Redress Mechanism (GRM) is a locally based, accessible, and transparent process for receiving, investigating, and resolving grievances related to the Project. The ESCA (v2.0, 3 June 2026) found that no dedicated, accessible project-level external grievance mechanism had been established, that the Project relied on Akimat and national mechanisms, and that grievances were not consistently logged, tracked, escalated or closed under Project control (finding SE-4, High risk). The GRM set out in this Section is the mechanism established in response to that finding, and this SEP is the corresponding response to ESCA finding SE-1 (High risk), which requires an updated and implemented Stakeholder Engagement Plan consistent with lender standards, with formal lender acceptance as the closure indicator. The GRM is being established and operated for the remainder of the construction phase and continues through the operational phase. KTZ owns and operates the GRM at every level: it chairs the Grievance Redress Committees, maintains the grievance register and is accountable for the service standards in Table 10. District and Oblast Akimats participate in the committees and in resolving grievances that fall within their competence. Where a grievance requires a decision or action by an Akimat or another state body, KTZ's obligation is to refer the matter formally, follow it up and inform the complainant in writing of the outcome, or of the status of any pending action, within the applicable service standard.

The GRM does not replace or restrict complainants' rights to access national courts or lender accountability mechanisms at any time. It also complements, but does not replace, the public complaint and conflict-resolution mechanisms of the Republic of Kazakhstan, including the E-Otinish electronic petition and complaint system, which complainants may use in parallel with or instead of the project GRM.

The specific objectives of the GRM include: (i) to provide stakeholders with a structured process to voice complaints and concerns; (ii) to ensure grievances are addressed promptly and transparently; (iii) to document and analyze grievances to inform project improvements; (iv) to prevent escalation of issues through proactive conflict resolution; and (v) to uphold the rights of complainants and prevent retaliation at all stages.

8.2 GRM Principles

The Project GRM is guided by the following principles, consistent with ADB SPS, IFC PS1, and AIIB ESF:

- **Accessibility:** the GRM is available to all stakeholders at no cost, without the need for legal representation, and through multiple channels including anonymous submission.
- **Transparency and predictability:** procedures, responsibilities, and timelines are publicly disclosed.
- **Fairness and impartiality:** grievances are assessed objectively and without discrimination.
- **Confidentiality and data protection:** personal data are protected; sensitive cases handled discreetly.
- **Non-retaliation:** complainants are protected from retaliation or adverse consequences at all times.
- **Timeliness:** grievances are acknowledged and addressed within defined timeframes.
- **Inclusivity:** the GRM is accessible to vulnerable and disadvantaged groups, with multiple intake pathways and multilingual materials.

- SEA/SH sensitivity: complaints related to sexual exploitation, abuse, or harassment are handled through a separate survivor-centred, confidential pathway.

8.3 Types of Grievances Covered

The GRM accepts all grievances related to the Project, including but not limited to:

- Land acquisition, valuation, compensation, displacement and livelihood-restoration matters — registered by the project GRM and then referred to the separate LARP grievance mechanism, with KTZ coordinating mixed grievances so that a complainant need not submit twice;
- Temporary or permanent access restrictions;
- Construction impacts — noise, vibration, dust, waste, and traffic safety;
- Property damage allegedly caused by construction vibration or other project activities, including the damage investigation and repair/compensation process set out in Section 8.6;
- Environmental impacts, including water and irrigation disruption, and impacts on the Shardara Reservoir IBA/KBA;
- Labor and working conditions;
- Conduct of contractors and their workers;
- Stakeholder engagement, disclosure, and consultation processes; and
- Sexual exploitation, abuse, or sexual harassment (SEA/SH) — handled through the confidential channel described in Section 8.9.

8.4 GRM Levels and Structure

The GRM is structured across three levels, with escalation through each level if not resolved. Table 10 sets out the composition and service standards at each level.

Table 10: GRM Structure and Service Standards

Level	Composition	Location	Service Standard
Level 0 — Project Site	Community Liaison Officer (CLO)	EPC Integra site; KTZ Project Site offices; Erdaulet / Maktaaral stations	First point of contact. Grievances may be lodged in person, by telephone (Project hotline or CLO), by email or letter, through grievance boxes, or via the District or village okrug Akimat (Section 8.7). Register within 24 hours of receipt; acknowledge within 5 working days. CLO attempts resolution within 2 weeks of receipt, or escalates to Level 1.
Level 1 — District Akimat	KTZ Darbaza–Maktaaral Project Manager; CLO; Designated Project Technical Supervisors; Deputy Akims of Saryagash, Keles, Zhetysay and Maktaaral (or representatives) for	District Akimat offices (Saryagash, Keles, Zhetysay, Maktaaral)	Resolve within a further 2 weeks of escalation from Level 0 (within approximately 4 weeks of original receipt). For matters within the competence of an Akimat or other state body, this standard applies to KTZ's referral, follow-

Level	Composition	Location	Service Standard
	grievances within their competence; Representative of Women's / Vulnerable Groups.		up and written response to the complainant (Section 8.1).
Level 2 — Turkistan Oblast	KTZ HQ Project Manager; Darbaza–Maktaaral KTZ PM; KTZ Chief Grievance Officer; Akim of Turkistan Oblast (or representative); District Deputy Akims as relevant.	Turkistan Oblast Akimat	Resolve within a further 1 month of escalation from Level 1 (within approximately 2 months / 8 weeks of original receipt). For matters within the competence of an Akimat or other state body, this standard applies to KTZ's referral, follow-up and written response to the complainant (Section 8.1).
Legal system	Court of law — available to complainant at any stage.	National courts	Available at any time, independently of GRM.
ADB / IFC / AIIB accountability mechanisms	ADB Accountability Mechanism; IFC Compliance Advisor Ombudsman (CAO); AIIB Project-affected People's Mechanism (PPM).	International (online submission)	Last resort where project-level mechanisms are exhausted.

Interface with the LARP grievance mechanism Grievances concerning land acquisition, valuation, compensation, displacement or livelihood restoration may be submitted through any Project GRM entry point and will be referred internally for resolution under the LARP procedure. The original submission date will be retained, and KTZ will track the grievance and keep the complainant informed until it is closed under the LARP procedure, without requiring the complainant to resubmit it. Decisions on these grievances rest with the LARP Grievance Redress Committees and the competent Akimats. The regional GRC meets twice a month and considers cases within ten working days; unresolved cases are escalated to the central GRC in Astana, which meets monthly and considers cases within twenty working days. Mixed grievances will be coordinated internally and addressed through a consolidated response.

8.5 Grievance Handling Procedure

The GRM operates as set out below. These elements are in place during construction and continue into operation:

Step 1 – Receive the grievance. Grievances may be submitted through any established GRM entry point, including directly to the Community Liaison Officer (CLO) or through grievance boxes located at accessible points along the alignment and at village or District Akimat level. Akimats are asked to forward Project grievances they receive to the CLO; for these, the date of receipt for the service standards is the date on which the CLO receives the grievance. The CLO checks grievance boxes at least every two weeks.

Step 2 – Register and acknowledge. The CLO registers each grievance in the grievance log/database (i.e. a controlled Excel-based register maintained in the Annex B format, with restricted access to confidential data and regular back-up) within 24 hours of receipt and acknowledges it within five working days. The complainant's identity is kept confidential where requested.

Step 3 – Screen and assign. The CLO assesses the nature and severity of the grievance and assigns it to the responsible person or GRM level. Land acquisition and resettlement grievances are referred internally to the LARP grievance procedure without requiring the complainant to resubmit them.

Step 4 – Investigate and propose a resolution. The responsible personnel investigate the grievance, consult the complainant and relevant parties, and propose an appropriate resolution. Options may include corrective action, agreement through discussion or negotiation, third-party mediation or, where appropriate, customary resolution practices.

Step 5 – Communicate and implement the outcome. The proposed resolution and supporting reasons are communicated to the complainant. Once agreed, corrective actions are implemented and documented through photographs, records and, where available, confirmation from the complainant.

Step 6 – Close or appeal. A grievance is closed only after the agreed actions have been completed and verified. If the complainant is dissatisfied, the case may be appealed through the GRM levels. The complainant may seek redress through the national courts at any stage. KTZ may also convene an independent review panel, including government and civil-society representatives, where additional oversight is warranted.

Step 7 – Monitor and report. KTZ tracks all grievances to closure, analyses trends to identify recurring issues and publishes semi-annual anonymized information on grievances received, resolved, outstanding and referred to third parties. Quarterly reports are also provided to the Lenders.

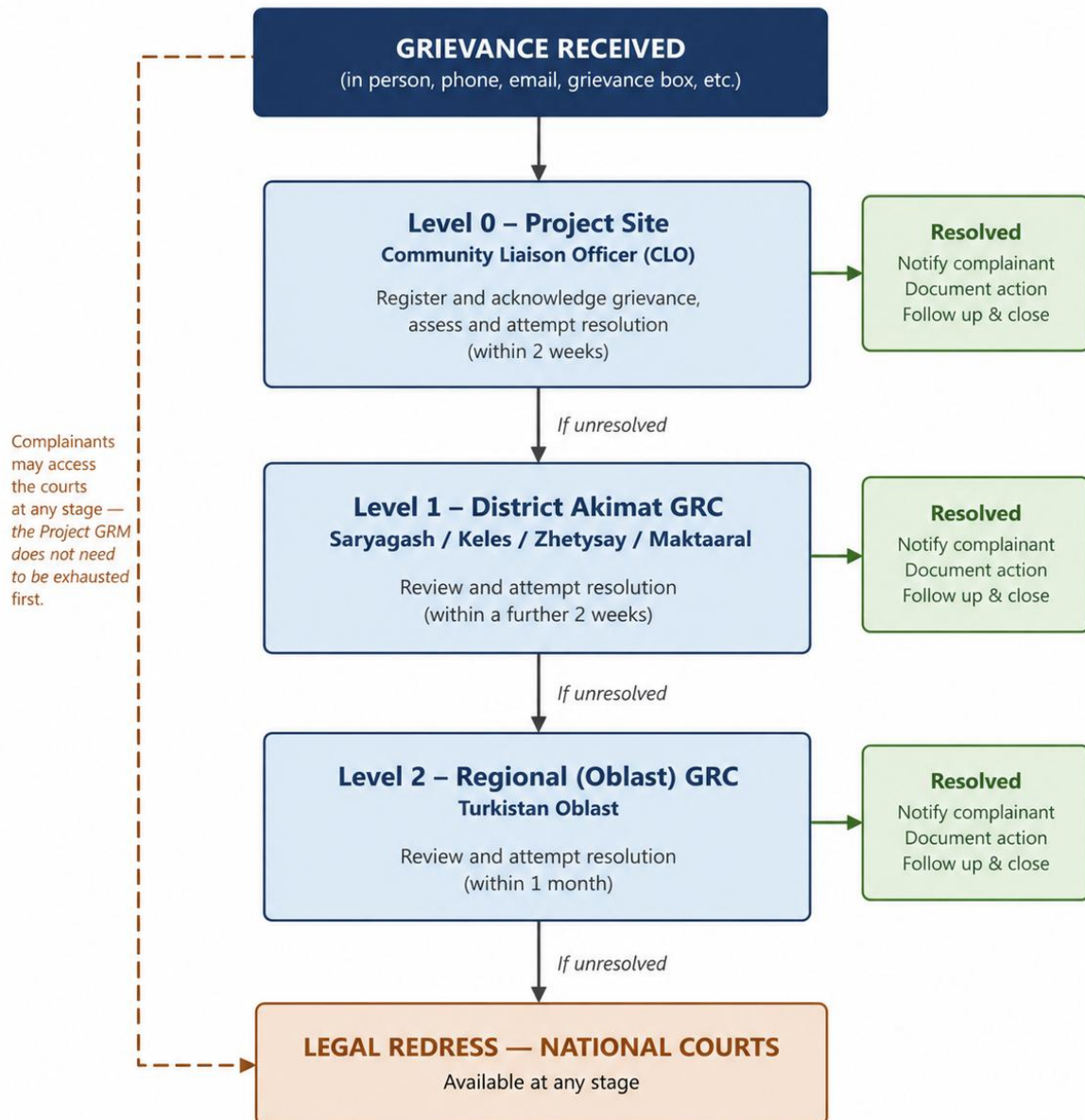
1.1.1 Levels and Procedure for Grievance Redress

The overall responsibility for the timely implementation of the GRM rests with KTZ, with support from the Project Managers at headquarter/site level and Project Technical Supervisors at contractor/subcontractor level, who are involved in managing and overseeing the civil works and other activities associated with the project. Additionally, relevant village / district / oblast, Akimats, which are legally mandated to handle grievance redress tasks, as well as mediators and non-governmental organizations (NGOs) engaged in facilitating amicable resolutions of grievances, are also incorporated into the GRM.

This GRM envisages three levels of grievance resolution:

- Level 0: CLO at Project Site level;
- Level 1 Grievance Redress Committees (GRC) at District Akimat levels; and
- Level 2 GRC at the Regional (Oblast) Akimat levels. Figure 1 presents the GRM structure established at KTZ.

Figure 1: Darbaza–Maktaaral Project Grievance Redress Mechanism



1.1.2 GRM: Project Site Level

At the first stage, the resolution of the grievance will be attempted by the CLO on site. The CLO will be required to follow the process of response and documentation of all grievances received. Receipt of every grievance will be acknowledged within 5 working days. The CLO will then have up to two weeks from receipt to contact and, where possible, meet the complainant and resolve the issue at site level; only if the grievance remains unresolved at the end of that two-week period will it be escalated to Level 1.

Receiving and Registering the Grievance

- Secure grievance boxes will be placed at various key designated locations along the alignment area (Erdaut, Maktaaral and intermediary train stations), and at Akimats offices at village/district level.
- Receipt of grievances lodged in person, via phone, through a letter or e-mail or fax will be acknowledged. together with the full contact details for the Community Liaison Officer and the Grievance Redress Committees at District and Regional level, are set out in the GRC Contact Details in section below.

- Complainants may choose to remain anonymous by writing down their grievances and submitting them in the available complaint boxes.
- Upon receiving a complaint, the CLO will register it in the grievance register or data system within 24 hours of receipt and issue an acknowledgment to the complainant within five working days.
- Grievances will be recorded in a standard format.

Assessment and Addressing the Grievance

- The designated CLO at Level 0 will check the complaint boxes once every two weeks. For grievances submitted through grievance boxes, the date of receipt for the service standards is the date on which the box is opened; urgent matters should be raised through the hotline or directly with the CLO.
- The grievance will be reviewed to determine if the issues raised fall within the scope of the grievance mechanism.
- During the assessment, the CLO will collect information on the key issues and concerns to evaluate potential resolutions.
- The CLO will attempt to resolve the grievance on site within two weeks of receipt.
- If the CLO is unable to resolve the grievance within two weeks of receipt, the issue will be escalated to the GRC at District Akimat level 1 for further screening and assessment. If intervention is necessary, it will be considered for further action; otherwise, the grievance will be deemed invalid, and the CLO at site level will inform the complainant of that outcome within the same two-week period.
- The GRC at District Akimat level will address grievances at Level 1 within a further two weeks after receipt from the CLO at Level 0.
- If the grievance is resolved at the CLO Level 0, the complainant will be notified of the outcome. If the grievance remains unresolved and is escalated to the Grievance Redress Committee (GRC) at the District Akimat level 1 for further consideration, the complainant will receive pertinent information, including the date the case was forwarded to the District GRC at Level 1 and the anticipated date for the resolution.
- In cases of anonymous complaints, the written response will be displayed on the information board of the relevant District or village okrug Akimat where the complaint was lodged and on the publicly accessible Project noticeboards within the affected communities, allowing the complainant to view and assess the feedback.

1.1.3 GRM: District (Akimat) Level

At this stage, the resolution of grievance will be attempted through GRC at the District Akimat level. The GRC at District Akimat level is composed of the following stakeholders:

- Darbaza-Maktaaral KTZ Project Manager, including CLO
- Designated Project Technical Supervisors, if relevant
- Deputy Akims of District Akimat of Saryagash, Keles, Zhetysay and Maktaaral, or designated representative(s), participating in grievances that fall within their competence
- Representative of Women's, Vulnerable Groups, and Farm Worker's / Commercial Agriculture's Association where applicable.

Akimats of the affected Districts located in the project area will be informed on the GRM process and will be involved in considering the grievances and can attend the GRC meeting in case the issue is

related to their community. In addition, professional mediators or representatives of NGOs may be involved in resolution of grievance cases, as needed.

A representative from the regional branch of KTZ, or the CLO will chair the GRC at the District Akimat level and be responsible for the overall operation of GRM and its efficient and timely implementation. Coordinator of the GRC at the District Akimat level will be nominated by the management of the regional branch of KTZ and be responsible for involving the relevant parties and coordinating the works of GRC at District Akimat level.

Assessment and Addressing of Complaints

- If the grievance is resolved at the CLO Level 0, the complainant will be notified of the outcome. If the grievance remains unresolved and is escalated to the Grievance Redress Committee (GRC) at the District Akimat level 1 for further consideration, the complainant will receive pertinent information, including the date the case was forwarded to the District GRC at Level 1 and the anticipated date for the resolution.
- In cases of anonymous complaints, the written response will be displayed on the information board of the relevant District or village okrug Akimat where the complaint was lodged and on the publicly accessible Project noticeboards within the affected communities, allowing the complainant to view and assess the feedback.
- At the GRC District Akimat Level 1, the CLO and KTZ Darbaza-Maktaaral PM will attempt to resolve the grievance within two weeks of the escalation (in other words, within approximately four weeks of the original receipt of the grievance from the complainant).

1.1.4 GRM: Regional (Oblast) Level

Following unsuccessful consideration of grievance by GRC at the Akimat level 1, the complaint resolution will be attempted at the Regional (Oblast) level. The GRC at Turkistan Regional (Oblast) level is composed of the following parties:

The Project GRM operates through the District GRC (Level 1) and the Turkistan Oblast GRC (Level 2). The regional and central Grievance Redress Committees referred to elsewhere in this SEP belong to the separate LARP grievance procedure (Section 8.4) and do not form part of the Project GRM escalation route.

- KTZ (Headquarters - Astana) Project Manager and Darbaza-Maktaaral KTZ Project Manager, including the CLO
- KTZ Chief Grievance Officer (Corporate level)
- Akim of Turkistan Oblast or designated representative, participating in grievances that fall within their competence
- Deputy Akims of District Akimat of Saryagash, Keles, Zhetysay and Maktaaral, or designated representative(s), participating in grievances that fall within their competence

For grievances related to the project, the representatives of the KTZ Project Manager will be invited to take part in the meeting of the GRC at the Oblast level, in person or by video conference (e.g. Zoom or Microsoft Teams), provided the complainant is able to participate fully. The complaining party, as well as representatives of relevant state stakeholders, village / district / oblast Akimats, designated Project Technical Supervisors (as needed) will also be invited to attend the GRC meeting.

Assessment and Addressing of Complaints

- If the grievance is resolved at the District Akimat Level 1, the complainant will be notified of the outcome. If the grievance remains unresolved and is escalated to the Grievance Redress Committee (GRC) at the Regional (Oblast) Level 2 for further consideration, the complainant

will receive pertinent information, including the date the case was forwarded to the Oblast GRC at Level 2 and the anticipated date for the resolution.

- At Level 2, the KTZ Chief Grievance Officer (Corporate level) will collaborate with the Corporate-level Director of Human Resources & Administration and the Director of Operations, with the Government Relations Department involved where the grievance concerns matters within the competence of state bodies, to address the grievance. The Chief Grievance Officer will facilitate decision-making, and if necessary, meetings will be held with the complainant to examine evidence. The grievance will be resolved within one month following the referral. In total, a grievance escalated through to Level 2 will be resolved within approximately two months (about eight weeks) of its original receipt at Level 0.
- Complainants will have the opportunity to participate in committee meetings and discuss their grievances at both levels. If the issue remains unresolved after both levels, the complainant may approach an appropriate court for redress.
- Anonymous complaints will be registered at the site level, discussed by the GRC committee, and appropriate actions will be taken if the complaints are found to be valid.

1.1.5 GRM: Legal System

If after the intervention and assistance from the GRCs at both District Akimat level and Regional (Oblast) level, no solution has been reached, and if the grievance redress system fails to satisfy the complaining parties, the case will be referred to the court for resolution in accordance with the RoK legislation.

At any time, the complaining party has the right to submit the case to the court of law in the first stage of grievance process, and does not have to follow the two levels of grievance resolution envisaged by the GRM.

8.6 Property Damage Grievances — Special Procedure

Where a grievance alleges property damage caused by construction activities (in particular vibration or ground movement), the following enhanced GRM procedure applies to every reported case:

- Complaint registered in GRM log within 24 hours of receipt.
- Site inspection by the EPC Contractor ESHS Manager within 72 hours, with photographic documentation of the alleged damage.
- Inspection findings compared against the pre-construction baseline condition survey (Maktaaral) or the current-condition (as-is) survey (elsewhere, including Ushagash) for that property.
- Vibration monitoring log reviewed for the relevant period and location against applicable trigger and action levels.
- Where causation remains uncertain or the damage is significant, an independent structural engineering assessment is commissioned by KTZ within 10 working days.
- Written causation determination issued by KTZ to the complainant within 21 working days of the complaint.

Each causation determination is evidence-based. It records the findings of the site inspection, the comparison with the baseline or current-condition survey for the property, and the vibration monitoring data for the relevant period and location relative to the applicable trigger and action levels, together with the independent structural assessment where one has been commissioned. Where no condition survey is available for the property, the determination is based on the remaining evidence and, where causation remains uncertain, on the independent structural assessment. Where damage

is determined through this procedure to be project-related, KTZ will repair the affected structure to its pre-project condition at the Project's cost, or provide compensation at full replacement cost where repair is not feasible or not preferred by the affected party. Business losses directly attributable to construction impacts and substantiated by documentary evidence (for example, records of trading or income before and during the disruption) are also eligible for compensation.

8.7 GRM Focal Points and Contact Details

Grievances may be submitted through any of the following channels:

GRC Contact Details at District Level

- Darbaza-Maktaaral KTZ Project Manager
(to be added)
- Community Liaison Officer
Laura Isaeva, Project contact for social issues
Phone: +7 778 616 0179
E-mail: laura0479@mail.ru
- Project Grievance Hotline and Email (institutional, role-based channels that remain available independently of individual staff appointments and operate alongside the designated CLO)
Hotline: (to be confirmed by KTZ)
Email: (to be confirmed by KTZ)
- Designated Project Technical Supervisors
(to be added)
- Saryagash District Akimat
Kuanish Askarovich Kanseitov, Leading Specialist, Land Relations Department
Phone: +7 702 369 8385
- Keles District Akimat
Talgat Tontayevich Yesenbekov, Chief Specialist, Land Relations Department
Phone: +7 705 772 7664
- Zhetysay District Akimat
Azamat Bolatuly Serikbay, Chief Specialist, Land Relations Department
Phone: +7 771 695 3354
- Maktaaral District Akimat
Sabit Bekmyrzauly Absattarov, Chief Specialist, Land Relations Department
Phone: +7 708 007 9707
- Representative of Women's, Vulnerable Groups, and Farm Worker's / Commercial Agriculture's Association where applicable
(to be added)

GRC Contact Details at Regional Level

- KTZ (Headquarters - Astana) Project Manager and Darbaza-Maktaaral KTZ Project Manager
(to be added)
- KTZ Chief Grievance Officer (Corporate level)
(to be added)
- Community Liaison Officer
(to be added)
- Akimat of Turkistan Oblast
(to be added)

8.8 Availability for Vulnerable and Disadvantaged Groups

The GRM is designed so that vulnerable and disadvantaged persons — including women, the elderly, persons with disabilities, low-income and severely affected households, ethnic-minority (including Uzbek-speaking) households, and seasonal labor migrants — can learn about and use it on an equal basis:

- Information is provided in Kazakh, Russian and Uzbek and in plain language, using verbal and pictorial formats where literacy is a barrier, and disseminated through women-only and small-group sessions as well as open meetings.
- Multiple confidential intake routes are available (grievance boxes, hotline, general email, in person, and trusted intermediaries such as village elders and female focal points), so complainants need not raise sensitive matters in public or through male intermediaries.
- Awareness activities are timed around the agricultural calendar and male out-migration season to reach women and absent household members.
- GBVH concerns are handled through the separate confidential, survivor-centred channel (Section 8.9) with female focal points available for intake.

The CLO records complainant vulnerability status (where known and consented) so that uptake by vulnerable groups is monitored and barriers addressed.

8.9 GBVH-Specific GRM Channel

Gender-Based Violence and Harassment (GBVH) grievances — including sexual exploitation, abuse, and sexual harassment — are managed through a separate, survivor-centred process.

The Project applies the IFC Good Practice Note on Addressing GBVH in Investments Involving Major Civil Works (2020) framework and the requirements of IFC PS2 22 and ILO Convention 190 to ensure that workers and community members affected by gender-based violence and harassment have access to confidential, survivor-centred reporting channels that are distinct from — but interoperable with — the general project Grievance Redress Mechanism. The principal elements are:

- **Women-only contact points:** Female-only contact points are designated at each work front, at the Project Site office, and at the KTZ regional office in Turkistan, with named female staff trained in GBVH-sensitive complaint receipt and survivor referral. The female E&S specialist who supported the May 2026 consultations is the principal female contact at Project level pending the establishment of permanent female focal points by the EPC contractor.
- **Confidential GBVH reporting:** GBVH cases are reported through a dedicated channel separate from the general GRM register, with restricted access limited to designated GBVH responders. Anonymous reporting permitted. Submission channels include direct telephone to the female focal point, dedicated email address, in-person submission to the designated female focal point or the female E&S specialist, and submission through trusted intermediaries (community elders, religious leaders, female community representatives) where the survivor prefers indirect contact.
- **External support and referral pathways:** Referral arrangements agreed by KTZ with the Union of Crisis Centres of Kazakhstan and the Shymkent regional crisis center for survivor support; the national 150 helpline operated by the Ministry of Internal Affairs; the local Department of Internal Affairs (police) for criminal aspects; the Akimat social-services department in each district; and primary healthcare facilities (FAPs and District hospitals) for medical care, with explicit referral consent from the survivor. The female focal point coordinates the referral pathway as requested by the survivor. KTZ's role is to establish and maintain this referral

pathway: agreeing referral arrangements with the service providers, keeping contact details current and ensuring that focal points can make referrals with the survivor's consent. Specialist support services are provided by these organisations, not by KTZ.

- **Designated GBVH focal points:** Named GBVH focal points at each work front, at KTZ Project Manager level, and at KTZ Corporate level, all trained in GBVH-sensitive complaint receipt, survivor support, and the referral framework. Refresher training at 6-month intervals. Contractor-side GBVH focal points required at each subcontractor with workforce in the project area.
- **Anti-retaliation protections:** Explicit prohibition of retaliation against complainants or witnesses in the Project Code of Conduct, with disciplinary measures including immediate dismissal for confirmed retaliation. The Workers' GRM (Section 8.10 below) includes specific anti-retaliation provisions covering both general and GBVH-related complaints.
- **Confidentiality:** GBVH case records are held by the KTZ Project E&S Team in a restricted-access register (password-protected electronic file or locked physical file at the KTZ Project site office), separate from the general GRM log and accessible only to designated GBVH responders. Aggregate statistics (case count by category, response time, resolution outcome) are reported to KTZ E&S team and to lenders in the semi-annual E&S monitoring report; identifying details are not disclosed. The survivor controls the level of identifying information shared at each stage.
- **Interoperability with general GRM:** Where a complaint received through the general GRM contains GBVH content, the receiving CLO refers the case to the designated GBVH responder using a defined transfer protocol that preserves confidentiality and re-establishes survivor consent for any further engagement.
- **Operational-phase continuation:** Post-commissioning, the GBVH framework continues under KTZ corporate code of conduct application with the operational workforce at Yerdaut depot and Maktaaral disinfection complex, supported by the operational CLO function and the continued partnership with regional crisis centers.

8.10 Worker GRM

A separate Workers' Grievance Redress Mechanism is established and implemented in accordance with IFC PS2, AIIB ESS2, and ADB SPS SR2, applicable to all categories of Project worker including KTZ direct staff, EPC Contractor workforce, and subcontractors.

The Workers' GRM is accessible to all categories of Project worker including KTZ direct staff, EPC contractor workforce, subcontractor workforce, and migrant labor, with provisions appropriate to the multi-employer construction context.

- **Access:** The Workers' GRM is communicated to all workers during induction in a language they understand (Kazakh and Russian, and other languages as required by workforce composition), and is supported by written materials (printed grievance forms, contact details, procedure overview) prominently displayed at worker accommodation, canteen, and work-front locations.
- **Submission channels:** (a) In-person to the EPC contractor HR or E&S representative at the work front; (b) in writing through grievance boxes at worker accommodation and canteen locations checked every two weeks; (c) by telephone or email to the named CLO and to the EPC contractor HR; (d) anonymously through the grievance boxes or through trusted intermediaries; (e) directly to the KTZ Project E&S team for cases the worker prefers to escalate outside the EPC contractor; (f) for GBVH cases, through the dedicated GBVH channel.

- **Independent review:** Workers' GRM operation is subject to independent review by the KTZ Project E&S team on a quarterly basis, with aggregate statistics (case count by category, response time, resolution outcome, escalation rate) reported in the semi-annual E&S monitoring report to lenders. The Independent E&S Consultant (IESC) for the Project reviews Workers' GRM performance during semi-annual monitoring missions, with explicit focus on accessibility for subcontracted and migrant labor.
- **Anti-retaliation:** Explicit anti-retaliation provisions in worker contracts and the Project Code of Conduct, with disciplinary measures including dismissal for confirmed retaliation against complainants or witnesses. Workers' GRM cases involving retaliation allegations are escalated to KTZ Project E&S team for independent investigation.
- **Categories and timescales:** Categories: (i) wages, hours and terms of employment; (ii) accommodation and welfare; (iii) OHS and safe working conditions; (iv) discrimination and harassment (with GBVH cases referred to the dedicated channel); (v) freedom of association and workplace representation; (vi) employment termination; (vii) other. Timescales: acknowledgement within 5 working days; resolution at first level within 10 working days; escalation to KTZ Project E&S level if not resolved at first level, with resolution within a further 10 working days; final escalation to KTZ Corporate level if not resolved at second level. Workers retain right to take any case to applicable courts at any stage.
- **Operational-phase continuation:** Post-commissioning, the Workers' GRM continues under KTZ corporate framework for operational workforce at Yerdaut depot, Maktaaral disinfection complex, and operational maintenance teams along the alignment, with the same access channels, anti-retaliation provisions, and independent review applicable.

8.11 Protection Against Reprisals

The Project treats protection of complainants as a core requirement. Complainant identity is kept confidential; retaliation is expressly prohibited under the Project Code of Conduct and worker contracts with dismissal as the consequence for confirmed retaliation; any allegation of retaliation is treated as a priority grievance escalated outside the relevant line of management; and complainants retain the right to access national courts at any time.

8.12 Lender Accountability Mechanisms

Where grievances remain unresolved through all project GRM levels, complainants may also access the following independent lender mechanisms:

- ADB Accountability Mechanism (Office of the Special Project Facilitator and Compliance Review Panel): www.adb.org/site/accountability-mechanism
- IFC Compliance Advisor Ombudsman (CAO): www.cao-ombudsman.org
- AIIB Project-affected People's Mechanism (PPM): www.aiib.org/accountability
- E-Otinish — the national electronic petition and complaint system of the Republic of Kazakhstan, available to complainants in parallel with or instead of the project GRM and the mechanisms above.

8.13 GRM Monitoring and Reporting

GRM performance is monitored monthly using the indicators set out in Section 11. Grievance data are reviewed monthly by the CLO and summarized in quarterly reports to KTZ management and to the Lenders. Aggregated, anonymised GRM performance information is disclosed publicly (see Section 9).

8.14 GRM Implementation Experience and Committed Adjustments

The ESCA underlying the Supplementary ESIA found that no dedicated, accessible project-level external grievance mechanism had been established; that the Project relied on Akimat and national mechanisms; and that grievances were not consistently logged, tracked, escalated or closed under Project control (ESCA finding SE-4, High risk). It also found that stakeholder engagement was not consistently aligned with lender requirements, requiring an updated and implemented Stakeholder Engagement Plan with formal lender acceptance as the closure indicator (SE-1, High risk); that the grievance mechanism was not consistently embedded across contractors (SE-3); and that worker awareness of it was variable (LWC-3). This SEP and the GRM set out in this Section are the corrective actions for SE-1 and SE-4. KTZ and the EPC Contractor have therefore committed to the following consolidated adjustments:

- Establish and publicize permanent, role-based Project grievance channels, including a dedicated hotline and email address, which remain available independently of individual staff appointments and operate alongside the designated CLO.
- Apply a single auditable service standard across the Project: every grievance received by the CLO shall be registered within 24 hours and formally acknowledged within five working days, with response, escalation and closure times tracked in the grievance database.
- Maintain sufficient CLO capacity and regular community-facing coverage throughout active construction, including additional CLO support where required to ensure timely recording, investigation, coordination and follow-up of grievances.
- Standardize GRM awareness materials and communication across all active work fronts, camps and affected communities, using plain-language posters, leaflets, verbal briefings and akimat noticeboards in the relevant languages.
- Reinforce GRM induction and refresher training (at least every six months) for contractor and subcontractor personnel, strengthen EPC Contractor supervision of subcontractor compliance, and periodically review GRM uptake, awareness and service-standard performance so that further corrective action is taken where gaps persist.

This sub-section will be updated as implementation experience develops and as further ESCA or IESC monitoring findings become available.

8.15 Operational-Phase GRM Framework

Construction and operations overlap for approximately 12 months as sections of the railway are commissioned progressively. During this overlap and into full operation, the GRM continues under the following operational framework:

- A KTZ operational CLO is established at the Turkistan regional office, taking over community-facing GRM functions from the construction-phase CLO as sections transition to operation.
- A dedicated Project page on the KTZ corporate website provides an online grievance submission channel, supplementing the in-person, phone, and grievance-box channels described in Section 8.7.
- WhatsApp and Telegram channels operated via the rural okrug administrations provide an additional low-barrier submission route for operational-phase communities, subject to agreement with the relevant rural okrug administrations.
- Quarterly aggregate GRM performance reports are prepared for internal KTZ management review.
- An annual GRM report is provided to the Lenders during the operational phase.

- A comprehensive review of GRM performance and design is undertaken every five years during operation.

Targeted re-engagement with affected communities during operation, in addition to the routine annual community meetings, is required on each of the triggers listed in Table 5 (Operational-Phase Re-Engagement Triggers), which include:

- A vibration or noise exceedance recorded at a sensitive receptor.
- A hazardous-cargo incident on the operational railway.
- A confirmed mortality of a globally threatened species attributable to the Project (see the Biodiversity Action Plan).

8.16 Disclosure of the Grievance Process

Project information and GRM contact details will be displayed on notice boards at construction camps and active work fronts and, in consultation with local authorities, at appropriate publicly accessible locations within affected communities. Information displayed will include relevant construction notifications, contact details for the CLO/GRM, available grievance submission channels and applicable response timeframes. Information will be provided in locally appropriate languages and updated throughout construction.

The grievance redress mechanism will also be outlined during public consultations and informal meetings within the Project area during the preparation of the ESIA, its implementation, and throughout the subsequent civil works. Additionally, summaries of grievance resolutions will be included in the progress reports from KTZ that will be submitted to the Lenders.

9. Information Disclosure

9.1 Disclosure Principles

Information disclosure for the Project is guided by the following principles:

- **Timeliness:** information is disclosed early enough to allow stakeholders to understand issues and provide informed input before decisions are finalized.
- **Accessibility:** disclosure channels are locally appropriate and reach stakeholders without internet access.
- **Inclusivity:** materials are in Kazakh, Russian, and Uzbek (where relevant), in accessible formats including simplified summaries and visual materials.
- **Proportionality:** the level of detail is commensurate with the Project's risks, impacts, and stage of development.
- **Transparency:** information on Project decisions, mitigation measures, and responses to stakeholder feedback is disclosed clearly and consistently.

9.2 Language and Formats

Project information will be disclosed primarily in Kazakh and Russian, with Uzbek versions of key community materials provided in Maktaaral and other Uzbek-speaking areas. English versions of the ESIA, ESMP, and this SEP are disclosed for international stakeholders and on lender portals. Verbal explanations will be provided at all consultation events. Simplified non-technical summaries and visual materials will be prepared for community distribution.

9.3 Disclosure Channels

Information will be disclosed through a combination of the following channels:

- KTZ corporate website.
- ADB, IFC, and AIIB project portals, as required by each lender's disclosure policy.
- Akimat offices at district and village okrug level (printed materials and noticeboards).
- Noticeboards at construction sites and worker camps.
- Distribution at consultation events and community meetings.
- WhatsApp and SMS notification channels used by local akimats, where agreed with the relevant akimats.
- Project Information Brochures (PIBs) available on request at all engagement points.

9.4 Disclosure Schedule

Disclosure of the Supplementary ESIA and associated documents must also meet each Lender's minimum disclosure period ahead of Board (or equivalent) consideration of the Project: ADB SPS/PCP requires at least 120 calendar days for a Category A project; AIIB ESF requires at least 60 calendar days; and IFC requires at least 60 calendar days. The most demanding rule — the ADB 120-day requirement — governs the disclosure date reflected in the schedule below.

Table 11 sets out the documents to be disclosed, with timing, languages, and channels.

Table 11: Information Disclosure Schedule

Document / Information	Language	Timing	Channels
Supplementary ESIA (full report and non-technical summary)	English, Kazakh and Russian	October–November 2026	KTZ website; ADB / IFC / AIIB project portals; Akimat noticeboards; hard copies at akimat offices.
Environmental and Social Management Plan (ESMP)	Kazakh, Russian	October–November 2026	Same as above; available at site offices.
Construction-phase sub-plans (Noise & Vibration Management, EMP, OHS Plan, etc.)	Kazakh, Russian (summaries)	October–November 2026	Site offices; akimat offices; KTZ website.
Land Acquisition and Resettlement Plan (LARP)	Kazakh, Russian	October–November 2026	KTZ website; ADB/AIIB portals; disclosed to PAPs in person.
Stakeholder Engagement Plan (this document)	Kazakh, Russian, English	October–November 2026	KTZ website; ADB/IFC/AIIB portals; Akimat noticeboards.
Project Information Brochure / PIB	Kazakh, Russian, English	Continuously updated during construction	Distributed at consultations; akimat offices; grievance boxes; available on request.
Biodiversity Action Plan (BAP) — Preliminary version	English	October–November 2026	KTZ website; ADB/IFC/AIIB portals; ACBK.
Semi-annual E&S Monitoring Reports	Kazakh, Russian, English	Every 6 months during construction and first 3 years of operation	Lender portals; KTZ website (public summary).
GRM performance summary (aggregated, anonymised)	Kazakh, Russian	Semi-annually	KTZ website; district akimat noticeboards.
Consultation and Disclosure Report / You Said, We Did	Kazakh, Russian	Following each major consultation round	KTZ website; noticeboards; distributed at community meetings.

9.5 Feedback and Transparency

Stakeholders are provided with opportunities to submit comments and questions on disclosed information through consultations, written submissions, and the GRM. Feedback received is reviewed and tracked. A 'You Said / We Did' summary is disclosed following each major consultation round (Annex C).

10. Resources and Responsibilities for SEP Implementation

10.1 Roles and Responsibilities

10.1.1 KTZ JSC — Project Owner

KTZ holds overall responsibility for implementation and oversight of the SEP. Key responsibilities include:

- Ensuring stakeholder engagement activities are planned and implemented in accordance with this SEP.
- Leading information disclosure activities, including disclosure of environmental and social documents on the KTZ website and to lenders.
- Overall oversight and coordination of the GRM, including escalation handling, reporting, and lender accountability linkages.
- Ensuring GBVH-sensitive grievance handling through designated female focal points.
- Coordinating engagement with government authorities, lenders, environmental NGOs, and academic institutions.
- Maintaining records of all engagement activities and grievances, and reporting on SEP implementation to the Lenders.

10.1.2 EPC Contractor — Integra Construction KZ LLP

Integra and its subcontractors support SEP implementation at site level. Their responsibilities include:

- Appointing site-level CLO(s) and GRM focal points at each active work front.
- Implementing site-based disclosure measures including noticeboards, advance notices for high-vibration works, and distribution of PIBs.
- Serving as the first point of contact for community grievances at site level (GRM Level 0).
- Managing the Worker GRM in accordance with IFC PS2 and the Project's Labor Management Procedures.
- Ensuring all Contractor personnel are inducted on community relations, Code of Conduct, and SEA/SH risk mitigation.
- Carrying out the site inspection and data-collection steps of the property damage procedure (Section 8.6) within the required timeframes, and providing the relevant vibration monitoring records and condition surveys to KTZ; the causation determination is issued by KTZ, supported by an independent structural engineer where required.

10.1.3 Independent E&S Consultant (IESC)

The IESC supports KTZ and the Lenders in monitoring and verification of SEP implementation. Responsibilities include:

- Verifying effectiveness of engagement and disclosure activities at site level during periodic monitoring visits.
- Supporting grievance assessment, site inspections, and technical reviews (including property damage cases).
- Advising KTZ on corrective actions where gaps in SEP implementation are identified.

- Reporting on SEP and GRM performance to the Lenders as part of the independent E&S monitoring process.

10.1.4 E&S Specialists

Environmental and social specialists engaged by KTZ or through the IESC provide technical support for SEP implementation, including facilitating engagement with vulnerable groups, supporting SEA/SH-sensitive engagement and grievance handling, and preparing disclosure materials and consultation summaries, informed by the Project vulnerability screening (ESMP D-SE-01; ESCA CAP IPG-1) and the Gender Action Plan (CESMP-17; ESMP D-SE-02; ESCA CAP IPG-2) referenced in Section 4.4.

10.2 Resources

KTZ will ensure adequate financial, human, and logistical resources are in place to implement the SEP effectively. Resources include:

- Dedicated community liaison function (CLO, with female CLO focal points at each active work front).
- Budget for consultation activities (venue hire, translation, materials, travel, and catering for remote communities).
- GRM operation resources (grievance boxes, hotline, log maintenance, and reporting).
- Training for KTZ staff, Integra, and subcontractors on stakeholder engagement, GRM procedures, and SEA/SH risk mitigation.
- Logistical support for reaching dispersed rural communities across the four affected districts (Saryagash, Keles, Zhetysay, Maktaaral).

10.3 Training and Capacity Building

In addition to the resourcing set out above, KTZ, Integra, and subcontractor staff involved in community-facing roles will receive structured training covering: expected behaviours and accepted practice when interacting with communities and workers, so as to avoid a grievance arising in the first instance; the routes available to stakeholders to lodge a grievance; roles and responsibilities for handling and resolving grievances, including key internal and external contacts (Section 8.7); and recording and tracking procedures consistent with the GRM log (Annex B). This training is organised by the KTZ E&S Team for KTZ staff and by the EPC Contractor ESHS Manager for Integra and subcontractor staff, using materials approved by KTZ, at induction and at least every six months thereafter.

The CLO and the KTZ Chief Grievance Officer will receive specialist training to handle GBVH-related grievances through the confidential channel described in Section 8.9. Training will be refreshed six-monthly, aligned with the worker induction cycle. The specialist GBVH training is organised by the KTZ E&S Team and delivered by a qualified GBVH trainer or specialist organisation engaged by KTZ.

11. Monitoring and Reporting

11.1 Objectives

Monitoring and reporting are essential to ensure that stakeholder engagement, information disclosure, and grievance management activities are implemented effectively and in accordance with this SEP and Lender requirements. Monitoring serves to:

- Track implementation of planned engagement activities;

- Assess the effectiveness and inclusiveness of engagement and disclosure (self-assessment by KTZ against the indicators in Table 12, with independent verification by the IESC on behalf of the Lenders);
- Monitor GRM performance and identify recurring issues or systemic barriers;
- Identify gaps and support adaptive management; and
- Provide evidence of compliance to Lenders and the public.

11.2 Monitoring Indicators

Table 12 sets out the monitoring indicators for the SEP.

Table 12: SEP Monitoring Indicators

Indicator	Dimension	Target / Threshold	Data Source
Number and type of stakeholder engagement activities conducted (by group)	Engagement activities	≥2 community consultations per district per year of active construction.	KTZ CLO; ESMP monitoring report.
Participation levels including vulnerable groups	Engagement inclusiveness	≥30% women at community sessions; vulnerable group attendance recorded.	CLO sign-in sheets; gender disaggregated data.
Documents disclosed (type, language, channel, date)	Disclosure completeness	All ESIA-committed disclosures completed on schedule.	KTZ E&S Team; IESC verification.
Number of grievances received (community and workers), by type	GRM coverage	All complaints registered within 24 hours of receipt.	CLO grievance log; monthly ESHS report.
Percentage of grievances acknowledged within 5 working days	GRM responsiveness	100%.	CLO log; ESHS report.
Percentage of grievances resolved within service standards (2 weeks at Level 0; 4 weeks to end of Level 1; 8 weeks if escalated to Level 2)	GRM resolution	≥80% resolved within the applicable service standard; all escalated cases resolved within approximately 8 weeks (2 months).	CLO log; KTZ E&S Team.
Number of grievances related to vibration / noise / property damage	N&V impact management	Downward trend after vibration works complete at each location.	CLO log; ESHS Manager cross-reference to monitoring data.
Number of damage complaints investigated and determination issued within 21 working days	Damage response timeliness	100% of damage complaints receive written determination within 21 working days.	CLO log; ESHS Manager; IESC.
SEA/SH cases (aggregate count only, anonymised)	GBVH risk management	Zero tolerance; referral to support services in all cases.	Confidential GBVH register; reported as count only.

Indicator	Dimension	Target / Threshold	Data Source
Number of GRM escalations beyond site level	GRM effectiveness	Fewer escalations over time as construction impacts reduce.	KTZ E&S Team; quarterly report.

11.3 Monitoring Responsibilities

Monitoring responsibilities are allocated as follows: the CLO is responsible for day-to-day GRM logging, engagement records, and quarterly data compilation; the KTZ E&S Team is responsible for monthly data review, quarterly reports, and annual SEP review; the IESC is responsible for independent verification of monitoring data during periodic monitoring visits; and Integra is responsible for site-level engagement and grievance records, and for reporting to the KTZ E&S Team. In addition, an independent External (Resettlement) Monitor engaged by KTZ undertakes external monitoring of LARP implementation — including verification of compensation, livelihood restoration and vulnerable-household assistance outcomes, and review of stakeholder engagement and grievance management — and prepares the LARP Completion Report verifying satisfactory completion of resettlement obligations, consistent with ADB SPS (2009), AIIB ESS2, and IFC PS5.

11.4 Reporting

Monitoring results are reported through the following mechanisms:

- Monthly internal GRM and engagement summary: CLO to KTZ E&S Team.
- Quarterly E&S monitoring report: KTZ to Lenders (covering engagement, GRM, and disclosure performance).
- Semi-annual E&S monitoring report: full reporting on SEP and GRM performance to ADB, IFC, and AIIB.
- Public disclosure: aggregated GRM performance and engagement activity summaries disclosed on the KTZ website semi-annually.

11.5 Adaptive Management and SEP Updates

Where monitoring identifies gaps, recurring issues, or systemic concerns, corrective actions will be implemented in a timely manner. The SEP will be updated:

- Where material changes to Project scope, design, or risks occur;
- Following each major consultation round;
- In response to Lender or IESC recommendations; and
- At the transition from construction to operational phase.

Updated versions of the SEP will be disclosed in accordance with Section 9.

11.6 SEP-GRM Implementation Schedule

Table 13 sets out the indicative timeline for implementing the activities described in this SEP.

Table 13: Implementation timeline

Activity	Implementer	Timing
Disclosure of Supplementary ESIA and non-technical summary	KTZ, CLO, Lenders, Akimats	October–November 2026

Activity	Implementer	Timing
Disclosure of ESMP and construction-phase sub-plans	KTZ, CLO	October–November 2026
Disclosure of LARP to PAPs	KTZ, CLO, District Akimats	October–November 2026
Disclosure of this SEP	KTZ, CLO, Lenders	October–November 2026
Six-monthly community consultation rounds during construction	KTZ Project Manager, CLO	From ESIA disclosure, six-monthly
Semi-annual GRM performance disclosure	KTZ	Semi-annually, ongoing
Semi-annual E&S monitoring report to Lenders	KTZ, IESC	Every 6 months, construction and first 3 years of operation
Transition to operational-phase engagement (annual community meetings)	KTZ operational CLO, District Akimats	From commissioning; annual for 3 years, then triennial

Annex A: Stakeholder Consultation Records

This annex will present supporting data from stakeholder engagement and expert consultations conducted as part of ESIA preparation and during the construction phase. This will include:

- A.1 Community consultation sign-in sheets and attendance records.
- A.2 Photographs of consultation events.
- A.3 Summary of expert consultations (ACBK, Kazvodhoz, Ministry of Ecology, etc.).

Annex B: GRM Log

The GRM log below is maintained by the CLO and updated continuously. It is compiled monthly by the CLO, reviewed quarterly by the KTZ E&S Team and summarized in quarterly reports to the Lenders.

The Project register opens with the establishment of the Project-level GRM under ESCA corrective action SE-4. Issues raised before that date were handled through Akimat and national channels; the Akimats have reported that only a limited number of complaints were formally registered, with recurring issues relating to dust, roads, drainage and access raised through informal and Akimat-led channels. These categories are carried into the register as the opening baseline so that pre-existing issues are tracked to closure alongside new grievances.

Ref No.	Date Received	Complainant (or Anon)	Location	Category	Description	Status	Resolution / Notes

Annex C: Stakeholder Comments and Response Matrix (You Said / We Did)

This matrix presents issues raised during community consultations and the Project's response, demonstrating how stakeholder input has informed ESIA findings and management commitments.

Date / Location	Issue Raised ('You Said')	Raised By	Response / Commitment ('We Did')	ESIA / ESMP Reference
May 2026 / Ushagash (Keles)	Vibration cracking at houses near the alignment. Residents requested monitoring and confirmation that damage would be repaired.	Residents / PAPs	Current-condition (as-is) survey (works already underway at Ushagash), continuous PPV monitoring, 6-step SEP/GRM damage investigation procedure, repair/compensation commitment all incorporated. Written causation determination within 21 working days committed.	PPV monitoring — Supplementary ESIA §8.4.3; damage investigation procedure — SEP §8.6 (SEP/GRM procedure)
May 2026 / Oshakty (Keles)	Cattle underpass dimensions inadequate for actual livestock movements across the alignment.	Farmers / residents	Consultation proposals were reviewed against the final design. The final design provides 4.0 × 2.5 m livestock/agricultural passages at KM 22.9, KM 42.8, and KM 55.1 (clear height at KM 55.1 subject to as-built verification; see Section 6.1); however, not all requested locations were adopted, including the Bereke request at PK 365+09 (approximately KM 36.5). In the Sattarov/Oshakty area, the KM 42.8 passage and alternative cross-corridor access are provided. KTZ committed to pre-	ESIA §8.4.1 (Agriculture, AF001); LARP; GRM log

Date / Location	Issue Raised ('You Said')	Raised By	Response / Commitment ('We Did')	ESIA / ESMP Reference
			operational verification of the adequacy and practical accessibility of the as-built arrangements and written confirmation to the relevant akimat and communities; the commitment is logged in the GRM for tracking.	
May 2026 / Birlik (Keles)	Irrigation network damaged; LOTOK channel relocation not yet complete; water pipeline not installed.	PAPs / farmers	Survey, verification, compensation and restoration of LOTOK channel committed. Pipeline installation status to be confirmed in writing through the CLO, with an installation timetable to be provided to affected PAPs and incorporated into the LARP monitoring framework (see Table 9, item 10).	ESIA §8.4.1; ESCA CAP
May 2026 / Birlik (Zhetysai)	Re-survey of 31 affected irrigated plots requested. Concerns over accuracy of land area in LARP.	PAPs	Re-survey committed; written results to PAPs and local akimat.	LARP; ESIA §8.4.2
May 2026 / Akuy (Saryagash)	Concerns about diesel exhaust from trains; request for air quality monitoring at Akuy.	Residents	Operational air quality monitoring at Akuy village incorporated into operational ESMP.	ESIA §8.4.4
May 2026 / Erdauit (Saryagash)	Construction nuisance and child safety near active works; GRM awareness concerns.	Residents / parents	Reinforced contractor oversight; dedicated CLO coverage; GRM awareness measures strengthened; response and closure times reviewed.	ESIA §9; ESMP

Annex D: Grievance Application Form

This form may be submitted in person to the CLO at any construction site, by post or email, by dropping it in any secure grievance box along the alignment or at the District Akimat offices, or verbally to the CLO (who will complete the form on the complainant's behalf). All information is treated as confidential. Anonymous submissions are accepted.

DARBAZA–MAKTAARAL RAILWAY EXPANSION PROJECT — GRIEVANCE APPLICATION FORM

Reference Number (to be completed by CLO):
Date of submission:
Name of complainant (optional — may remain anonymous):
Contact details (phone / email / address — optional):
Location of the issue (village, district, kilometre post if known):
Category of grievance (tick one): ☐ Land/compensation ☐ Construction noise/vibration ☐ Property damage ☐ Dust/air quality ☐ Water/irrigation ☐ Access/safety ☐ Worker conduct ☐ SEA/SH (use confidential channel) ☐ Other:
Description of the grievance (what happened, when, and how it affected you):
What outcome would resolve this grievance?
Have you raised this issue before? ☐ Yes — Ref No.: _____ ☐ No
Preferred language for response: ☐ Kazakh ☐ Russian ☐ Uzbek ☐ Other:
Preferred response channel: ☐ In person ☐ Written ☐ Phone ☐ Do not contact (anonymous)
Complainant signature / mark (if in person):
Date received by CLO: CLO name and signature:

Submission channels: In person to CLO | Grievance box at any station or Akimat office | Phone: | Email:
| Written to KTZ Darbaza–Maktaaral Project Manager

Annex E: Format for Reporting Stakeholder Engagement

Each stakeholder engagement activity undertaken by the CLO, KTZ E&S Team, or IESC will be recorded using the format below, to support the monitoring and reporting commitments in Section 11.

Field	Detail to be Recorded
Date and location	
Activity type (consultation, disclosure, focus group, briefing, etc.)	
Target stakeholder group(s)	
Number of participants (disaggregated by gender)	
Organisations / agencies represented	
Key issues raised	
Commitments made / responses given	
Follow-up actions and responsible party	
Photographs / sign-in sheets (reference)	