

# Gijduvon 300MW Wind Farm Uzbekistan

Draft Resettlement Action Plan

Report



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## LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
<b>ADB</b>	Asian Development Bank
<b>ATG</b>	Asia Trans Gas
<b>E&amp;S</b>	Environmental & Social
<b>EP</b>	Equator Principles
<b>EPC</b>	Engineering, Procurement and Construction
<b>EPFIs</b>	Equator Principles Financial Institutions
<b>ESIA</b>	Environmental & Social Impact Assessment
<b>GRM</b>	Grievance Redress Mechanism
<b>Ha</b>	Hectares
<b>HH</b>	Head of Household
<b>HPZ</b>	Health Protection Zone
<b>IFC</b>	International Finance Corporation
<b>KPIs</b>	Key Performance Indicators
<b>LILO</b>	Line in Line out
<b>LLA</b>	Land Lease Agreement
<b>LNTP</b>	Limited Notice to Proceed
<b>M</b>	Meters
<b>M&amp;E</b>	Monitoring & Evaluation
<b>MEEPCC</b>	Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan
<b>MoE</b>	Ministry of Energy
<b>NEGU</b>	National Electrical Networks of Uzbekistan
<b>NTP</b>	Notice to Proceed
<b>O&amp;M</b>	Operation & Maintenance
<b>OHTL</b>	Over Head Transmission Line
<b>PAHs</b>	Project Affected Households
<b>PAPs</b>	Project Affected Persons
<b>PC</b>	Project Company
<b>PD</b>	Presidential Decree
<b>PEF</b>	Purchase Electrical Facilities
<b>PPA</b>	Power Purchase Agreement
<b>RAP</b>	Resettlement Action Plan
<b>SEP</b>	Stakeholder Engagement Plan
<b>SWID</b>	State Committee for Sericulture and Wool Development Industry
<b>TBC</b>	To Be Confirmed
<b>UZS</b>	Uzbek Soums
<b>WTGs</b>	Wind Turbine Generators
<b>5 Capitals</b>	5 Capitals Environmental & Management Consultancy

## GLOSSARY

TERM	DEFINITION
<b>Completion Audit</b>	External audit undertaken after the activities set out in this RAP have been completed, to determine whether the requirements herein have been met, particularly those pertaining to livelihood improvement or restoration.
<b>Cut-off date</b>	Refers to the date after which any new structures, trees, and other immovable assets will no longer be counted or measured for compensation purposes.
<b>Full replacement cost</b>	Refers to the market value of the assets plus transaction costs. In applying this method of valuation, depreciation of structures and assets should not be considered. Market value is defined as the value required to allow affected persons to replace lost assets with assets of similar value.
<b>Household</b>	An individual or group who share a dwelling unit and associated resources available to the household. A household does not necessarily correspond to a family and may consist of a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.
<b>Involuntary resettlement</b>	Refers to both physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) as a result of project-related land acquisition and/or restriction on land use.
<b>Livelihood</b>	Refers to the full range of means that individuals, families, and communities utilize to make a living, such as wage-based income, animal husbandry, pensions and various types of government allowance etc.
<b>Livelihood improvement or restoration</b>	Specific allowances or activities meant to support affected persons in improving or, at a minimum, restoring their livelihoods compared with pre-displacement levels.
<b>Project Affected Households (PAHs)</b>	Refers to all members of a household, whether related or not, operating as a single economic unit, who are affected by a project, either physically economically, or both.
<b>Project Affected Persons (PAPs)</b>	A natural person or legal entity experiencing either physical or economic displacement because of project-related land acquisition or restriction on land use, other assets or natural resources.
<b>Security of tenure</b>	In the context of this project, this means that the project affected persons have access to land that they can legally use and where they are protected from the risk of eviction.
<b>Significantly Affected Households</b>	ADB supported projects are considered significant if 200 or more persons will experience major impacts, which are defined as (i) being physically displaced from housing, or (ii) losing 10% or more of their productive assets (income generating).
<b>Transitional support</b>	This is the support provided during the period between the point of displacement and the time the PAPs livelihood and standard of living can be demonstrated to have been restored.
<b>Vulnerable groups</b>	Refers to people, who by virtue of gender identity, ethnicity, age, disability, economic, disadvantage or social status, may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits.

## EXECUTIVE SUMMARY

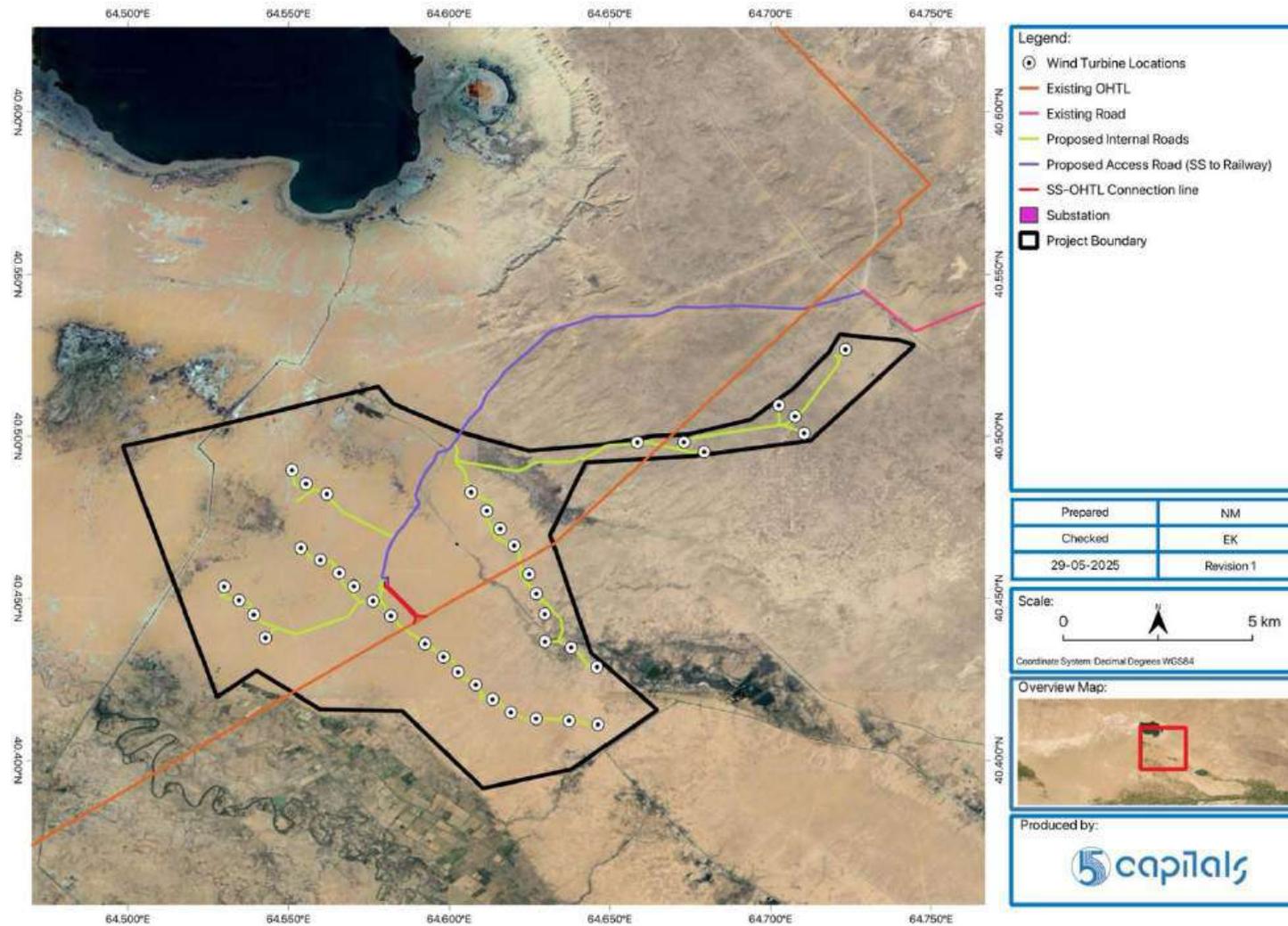
This draft Resettlement Action Plan (RAP) has been prepared for the Gijduvon 300MW Wind Farm. The Project will be located in Gijduvon and Shofirkon districts in Bukhara region of Uzbekistan.

The Project will be developed by ACWA Power Gijduvon Wind FE LLC (Project Company), and it will comprise the development, financing, construction, operation and maintenance of the following facilities:

- Wind farm components that will comprise of 39 WTGs.
- Each wind turbine will have a transformer where power will be evacuated using 33kV underground cables installed within the 12-m access road right-of way.
- An AIS 33/500kV sub-station including an administration building.
- An Overhead Transmission Line (OHTL) with a length of 1.5km and a rating of 500kV. This will include 10 towers.
- 49.3km of internal access road.
- 43.44km of external roads. Out of this, 25km is in good condition (from A379 highway to the railway station) but 18.64km from the railway to the proposed sub-station will require to be upgraded.
- Laydown area

The proposed project 1.5km OHTL will also connect to the Bash 500MW Wind Farm Karakul 500kV OHTL through a Line in Line Out (LILO). It is noted that the Bash 500MW WF underwent a separate Environmental and Social Impact Assessment (ESIA) and RAP process in accordance with the Environmental and Social (E&S) requirements of the European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB).

The location of the proposed Project facilities is provided in the figure below.



**Executive Summary Figure 1: Project Facilities**

The Project is seeking finance from the Asian Development Bank (ADB), and the Asian Infrastructure Investment Bank (AIIB). A detailed analysis between national legislation and Lenders' policies has been undertaken to identify key gaps and the steps the Project will take to address these gaps has been provided.

In addition, this draft RAP has been prepared in accordance with ADB, AIIB and IFC's involuntary land acquisition principles. It outlines the measures undertaken by the Project to minimise physical displacement and ensure meaningful stakeholder consultation and participation of the Project Affected Persons (PAPs) throughout its preparation, including the establishment and access to the Grievance Redress Mechanism (GRM). A cut-off date was also announced to the Project Affected Households (PAHs), and inventory of affected assets undertaken. The plan also includes a detailed entitlement matrix, outlining compensation at full replacement cost, along with other required support measures for vulnerable and significantly affected PAHs, and livelihood restoration programs for both formal and informal land users. Additionally, the RAP incorporates a monitoring and evaluation framework, which will enable tracking of progress to ensure compliance with the requirements established in this plan.

#### **PROJECT LAND REQUIREMENTS**

The WF permanent and temporary facilities including the OHTL will be located within a grazing land area measuring approximately 12,626ha. This land is under the ownership of the Committee for Veterinary Medicine and Livestock Development and has been leased to Kokcha and Galaba LLCs who have annual agreements with herders who graze on site. While the Project Company has been granted access to 12,626ha of the land, it is important to note that the land take will be based on the location of the footprint.

Based on the Project layout, approximately 117.49ha of the total 12,626ha will be utilised by the Project during the construction and operation phases, accounting for approximately 0.93% of the total allocated area. The rest of the land will remain available for grazing activities, and hence reducing the Project's impact on land use. The 117.49ha required will be allocated as follows for the construction and operation phases land requirements:

- Temporary areas for the EPC Contractor to construct laydown areas. This will include approximately 7.72ha which is approximately 0.06% of the total available grazing area.
- Permanent land take of approximately 109.77ha which is approximately 0.87% of the total 12,626ha of the allocated land. It is noted that grazing will still be possible within the areas outside of the Project facilities.

## SAFETY ZONES REQUIRED BY THE PROJECT

The construction and operation phases of the Project will require the establishment of safety buffer zones. These will include:

- **Construction phase:** The Project will implement a 250m safety buffer zone around the wind turbine construction areas and a 30m buffer on each side of the access roads. Grazing will be restricted within these buffer zones during the construction phase to ensure the safety of herders and their livestock, due to the movement of heavy vehicles, machinery, and assembly of the wind turbine components. It is noted that grazing will be possible in these areas during the operation phase.
- **Operation phase:** A Health Protection Zone (HPZ) of 250m will be implemented around each WTG while a 30m HPZ will be established on each side of the 500kV OHTL, measured from the outmost conductor. Grazing activities will be possible within these HPZ areas but no structures can be constructed.

## PROJECT IMPACTS

The proposed Project will lead to physical and economic displacement. The physical displacement will be because of the operation noise of the turbines and will affect five herders structures (H4, H5, H7, H12, and H14) and their 17 workers<sup>1</sup>. Based on this, these structures will need to be relocated prior to the commencement of the operational phase.

Additionally, the construction and operation of the project will result in both temporary and permanent impacts on grazing land. These impacts will be limited to the actual project footprint and will not affect the entirety of the land within the designated project boundaries. Temporary impacts during construction phase will arise from the construction of the laydown and storage areas, but the impacted land will be restored at the end of the construction phase. Similarly, construction of the 500kV OHTL will cause short-term impacts within a 30m construction corridor, after which grazing activities will resume. The OHTL construction area is used by H7 and H6, and three workers under H6 for grazing purposes.

Additionally, there are seven herders (some with shared structures)<sup>2</sup> and a total of 26 workers who will be affected by only shadow and flicker during the operation phase. These herders will not need to be relocated, but their structures will need modifications, particularly in the placement of windows and doors, to mitigate the impact. A qualified structural project engineer will support with the modifications, and on-going monitoring will be conducted to assess the effectiveness of these measures. The PAPs will also have access to the project GRM.

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<sup>1</sup> Workers who will be affected by the physical displacement of the herders include H4W1, H4W2, H4W3, H4W4, H5W2, H5W3, H5W4, H5W5, H5W6, H5W7, H7W1, H12W1, H12W2, H12W3, H14W1, H14W2, H14W3.

<sup>2</sup> The herders who will be impacted by shadow flicker include H3 (who shares accommodation with H24), H6, H8, H10 (who shares with H11) and H12(a).

To ensure safety during construction, the Project will establish temporary grazing restrictions, including a 250 m safety buffer around WTG construction areas and 30 m buffers along access roads. These restrictions are necessary due to the movement of heavy vehicles, machinery, and turbine assembly activities. The Project Social Manager and Community Liaison Officer (CLO) will conduct awareness-raising activities with herders and workers, and the EPC Contractor will be strictly restricted from operating outside the approved Project footprint.

Overall, grazing land impacts will affect 23 herders, including three herders (H3, H10, and H13) who also graze livestock on behalf of Kokcha LLC, as well as 39 workers who graze their own livestock alongside that of their employers. No additional land acquisition will be required during the operational phase. However, Health Protection Zones (HPZs) will be established in accordance with regulatory requirements, consisting of a 250 m radius around each WTG and a 30 m buffer on each side of the 500 kV OHTL. Site visits confirmed that no permanent structures are located within these HPZs, except for a movable trailer owned by H14(c), which is also affected by noise and shadow flicker and will therefore be relocated.

Additionally, there is potential for impacts on a gas pipeline operated by Uztransgaz from the construction and use of an internal access road leading to the WTGs located to the southwest of the site. As such, the project will be required to obtain technical conditions from Uztransgaz prior to construction of the access road and before any heavy equipment crosses the gas pipeline.

In summary, the Project will affect 5 government agencies, 2 livestock clusters, and Uztransgaz. Additionally, there are 78 PAHs comprising of 483 PAPs who will be affected by the Project.

**Executive table 1: Summary of affected PAHs/PAPs**

IDENTIFICATION GROUP	PAHs	PAPs
<b>Government Agencies</b>		5
<b>Livestock Clusters</b>		2
<b>Gas Operator</b>		1
<b>Herders</b>	22	130
<b>Farmers<sup>3</sup></b>	1	5
<b>Workers</b>	55	348
<b>Total</b>	78	483
<b>Total number of herders who will be physically displaced including their workers</b>	<b>18</b>	<b>120</b>
<b>Number of significantly affected herders</b>	<b>5</b>	<b>34</b>

<sup>3</sup> The farmer (coded as FR1) uses the land within the project site exclusively for grazing purposes. His farming land is located outside the project boundaries. Since only the grazing land will be affected by the project, he is therefore counted among the herders in this report. This brings the total number of herders to 23, including the farmer, based on land use.

<b>Number of significantly affected workers</b>	<b>13</b>	<b>86</b>
<b>Total number of significantly affected herders + workers</b>	<b>18</b>	<b>120</b>

#### IMPLEMENTATION REQUIREMENTS

The RAP includes a detailed entitlement matrix based on the impacted livelihoods and assets. It also includes additional support for vulnerable PAHs through a subsistence allowance based on one month of the minimum wage in Uzbekistan. The significantly affected PAHs will also receive a one-time stipend, calculated based on the basic calculations value outlined in the Presidential Decree No. 108<sup>4</sup> dated August 12, 2024 X 2.

Furthermore, all PAPs will be eligible for livelihood programs. These programs will be designed with the involvement of a livestock expert to conduct feasibility studies, including a needs assessment, and to develop a program for resources and activities, ensuring adequate follow-up and extension services. The selected program(s) will be provided to all PAPs with particular attention given to vulnerable groups and those significantly affected by the Project.

The total budget for the implementation of the draft RAP, including a 20% contingency fund, is UZS 11,779,188,101 (approximately USD 914,864).

The Project Company will play a leading role in the implementation of the RAP. At the Project Company level, responsibilities will be primarily distributed between senior management and the technical staff dedicated to the RAP. The most critical staff involved will include the E&S Manager, Social Manager, and the Community Liaison Officer. Additionally, a RAP Committee will be established to support the Project Company in the implementation of the plan. The PAPs representatives to the RAP Committee will be based on a consensus from the PAPs.

The implementation of the RAP will be closely monitored by the Project Company using predefined monitoring and evaluation indicators within this plan. The Project Company will submit compensation reports detailing whether compensation at full replacement cost has been distributed in accordance with the entitlements and timelines for all eligible PAPs prior to the EPC Contractor's access to land. Internal monitoring will evaluate the progress of the RAP and identify any necessary corrective actions. Semi-annual monitoring reports will be submitted to the lenders during the implementation of the livelihood programs.

In addition, an Interim Compliance Audit will be conducted once most of the compensation and support measures have been implemented to assess the progress in restoring the livelihoods of PAPs. Based on this, the lenders will decide if any additional or adaptive actions are necessary. Finally, a Final RAP Completion Audit will be carried out when appropriate and as agreed with the lenders, to evaluate whether the RAP objectives have been met and if the

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<sup>4</sup> The Presidential Decree No 108, issued on August 12, 2024, sets the basic calculation value at UZS 375,000 which is used to calculate different allowances.

livelihoods of all PAPs have been restored or improved. This will be reviewed and submitted to the lenders to determine if further actions are necessary.

#### **DISCLOSURE OF THE RAP**

The RAP was disclosed to stakeholders and PAPs from 21<sup>st</sup> to 23<sup>rd</sup> October 2025. During the disclosure process, stakeholders were provided with the opportunity to submit feedback and request clarifications.

Based on the feedback received, both the RAP and the ESIA were further revised to address the concerns raised by stakeholders and PAPs. Following these updates, additional disclosure meetings were conducted on 19<sup>th</sup> and 20<sup>th</sup> February 2026 to inform PAPs of how their comments had been addressed. During these meetings, they were also informed of updates to the project design, as well as the additional surveys and assessments to be undertaken in line with the lender's requirements.

In addition to the disclosures above, the project documents have been disclosed on the following websites:

- ACWA Power: <https://acwapower.com/en/what-we-do/projects/gijduvan-wind-ipp/>
- ADB: <https://www.adb.org/projects/59324-001/main>
- AIIB: [https://www.aiib.org/en/projects/details/2025/\\_download/Uzbekistan/P001027/Gijduvon-300MW-WF\\_RAP.pdf](https://www.aiib.org/en/projects/details/2025/_download/Uzbekistan/P001027/Gijduvon-300MW-WF_RAP.pdf)

# 1 INTRODUCTION

The Government of the Republic of Uzbekistan (GoU) through the Ministry of Energy (MoE) aims to increase the electricity production in the country from 12.9GW in 2019 to 29.3GW in 2030 to foster economic growth as part of the Republic of Uzbekistan (Uzbekistan) 2030 Energy Strategy. Of the 29.3GW of power generating capacity, 8GW will be from renewable energy, with wind power accounting for 3GW.

Regarding the development of wind farms, the Energy Strategy states the following as priority:

*“Creation of large-scale wind farms with single site capacities ranging from 100MW to 500MW mostly concentrated in North-Western region (Republic of Karakalpakstan and Navoi region) shall be the main priority of wind power development”.*

As part of the Uzbekistan 2030 Energy Strategy, ACWA Power has signed an implementation agreement with the MoE for developing, building and operating a 300MW Wind Farm (WF) in Gijduvon. ACWA Power has since established a Project Company ‘ACWA Power Gijduvon Wind FE LLC’. The Project Company has entered into a 25-year Power Purchase Agreement (PPA) with JSC ‘National Electric Grids of Uzbekistan’ (NEGU).

The WF will also include the development, financing, construction and transfer of Purchase Electrical Facilities (PEF) for the Overhead Transmission Line (OHTL) Line in Line out (LILO) connection with the Bash 500MW WF – Karakul OHTL.

## 1.1 Objectives of the Draft Resettlement Action Plan

This document constitutes the draft Resettlement Action Plan (RAP) for the Project, and is part of the wider Environmental and Social Impact Assessment (ESIA) prepared by 5 Capitals Environmental and Management Consulting (5 Capitals).

The objectives of the draft RAP are to:

- Set out avoidance, where possible, or minimization of involuntary resettlement impacts through consideration of project design alternatives.
- Provide the guidelines that sets out how the Project will address physical and economic displacement resulting from its development through resettlement and livelihood restoration and ensuring that the standards of living of the Project Affected Persons (PAPs) are not worse off following Project implementation.
- Identify the gaps between national law and lenders requirements) and identify how to address such gaps.
- Ensure the PAPs without legal lease agreements/contracts or any recognisable legal rights to land are eligible for compensation for loss of non-land assets and livelihood restoration.

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- Assess the physical and economic displacement impacts (temporary and permanent) due to the Project's land acquisition and land use restrictions.
  - Determine the existence of poor and vulnerable groups among the PAPs to ensure they are provided with applicable additional support.
  - Outline provisions to improve living conditions among displaced herders through provision of adequate housing including identification of suitable alternative grazing land as applicable.
  - Provide the PAPs eligibility criteria and entitlement matrix according to type of lost assets and ensure that compensation is provided at full replacement cost.
  - Outline a framework for sustainable livelihood restoration of the project affected households (PAHs).
  - Outline the Grievance Mechanism that will be followed to address any concerns/complaints and request for additional information of the PAPs. It should be noted that this GRM is related to the on-going project GRM that the PAPs can also access.
  - Establish organisational arrangements and processes to implement and monitor the implementation of the final RAP and take corrective actions as necessary; and
  - Set out the monitoring requirements of the resettlement and livelihood restoration outcomes, their impacts on the standard of living of the PAPs is carried out, and whether the objectives of the final RAP have been met.

## 2 PROJECT SUMMARY

This section provides a brief overview of the Project and details relating to the land required for its development. Additional details relating to the project and its components are provided in the standalone project-specific ESIA and Stakeholder Engagement Plan (SEP) documents.

### 2.1 Key Project Information

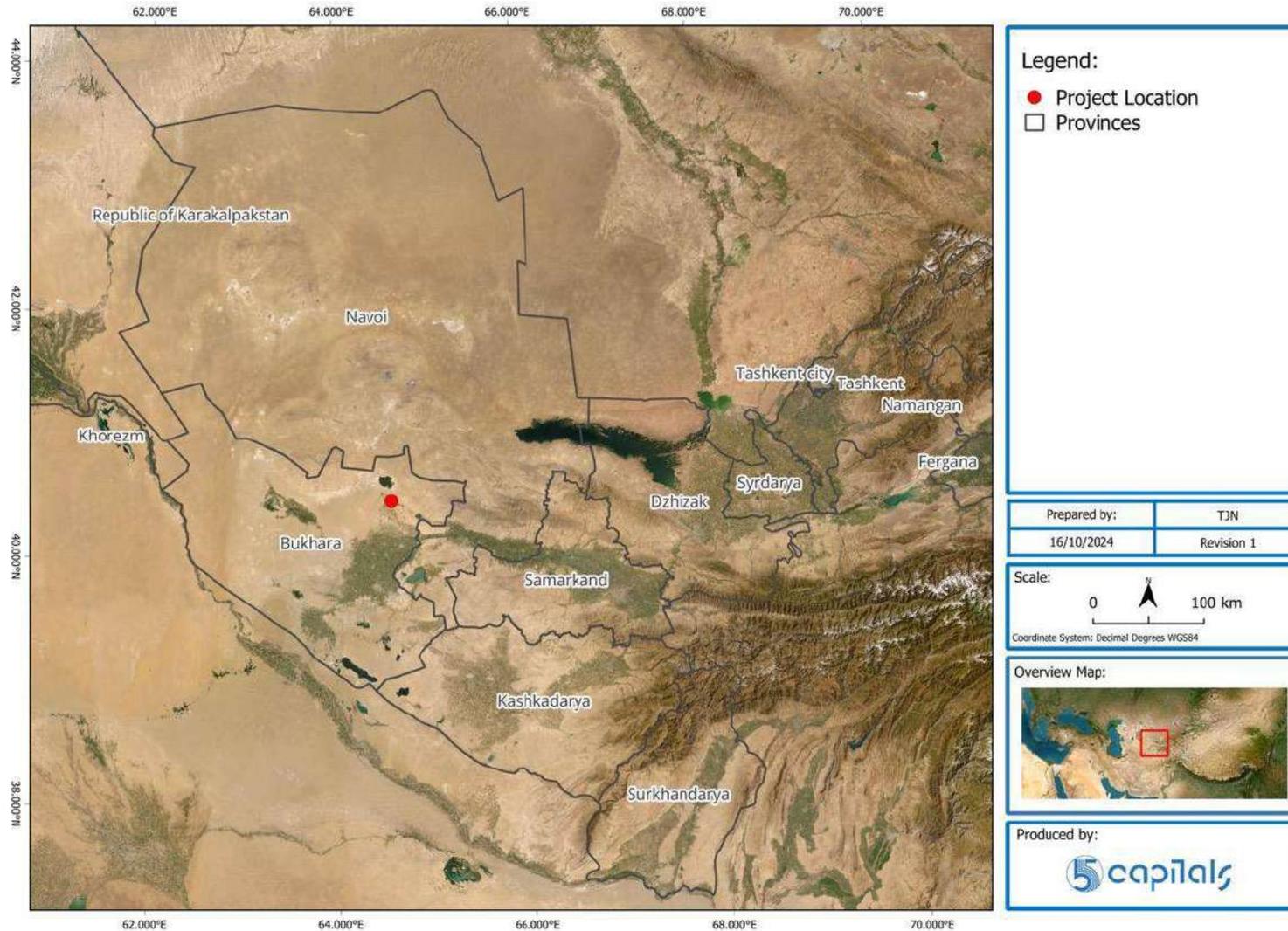
**Table 2-1 Key Project Information**

<b>PROJECT TITLE</b>	Gijduvon 300 MW Wind Farm
<b>PROJECT DEVELOPER</b>	ACWA Power
<b>PROJECT COMPANY</b>	ACWA Power Gijduvon Wind FE LLC
<b>OFF TAKER</b>	JSC National Electric Grid of Uzbekistan
<b>EPC CONTRACTOR</b>	To Be Confirmed
<b>O&amp;M COMPANY</b>	NOMAC
<b>ENVIRONMENTAL CONSULTANT</b>	5 Capitals Environmental and Management Consulting (5 Capitals) PO Box 119899, Dubai, UAE Tel: +971 (0) 4 343 5955, Fax: +971 (0) 4 343 9366 www.5capitals.com
	Juru Ltd Chust Str. 10, 100077, Tashkent, Uzbekistan Tel: +998 71 202 0440, Fax: +998 71 2020440
<b>POINT OF CONTACT</b>	Ken Wade (Director), Ken.wade@5capitals.com

### 2.2 Project Location

The Project is a 300MW wind farm located in the Gijduvon and Shofirkon districts in the Bukhara region of Uzbekistan. The Project includes the establishment of a collector sub-station, a 1.5km OHTL with a capacity of 500kV and internal access road. The wind farm will include a total of 39 Wind Turbine Generators (WTG), which will be sited within an investigation area measuring approximately 12,626ha. It is noted that the land allocated to the Project will be based on the actual Project footprint and not the entire 12,626ha (refer to chapter 5 for more details).

The proposed Project components and the WTG locations are provided in the following figure.



**Figure 2-1 Project Location – National Context**

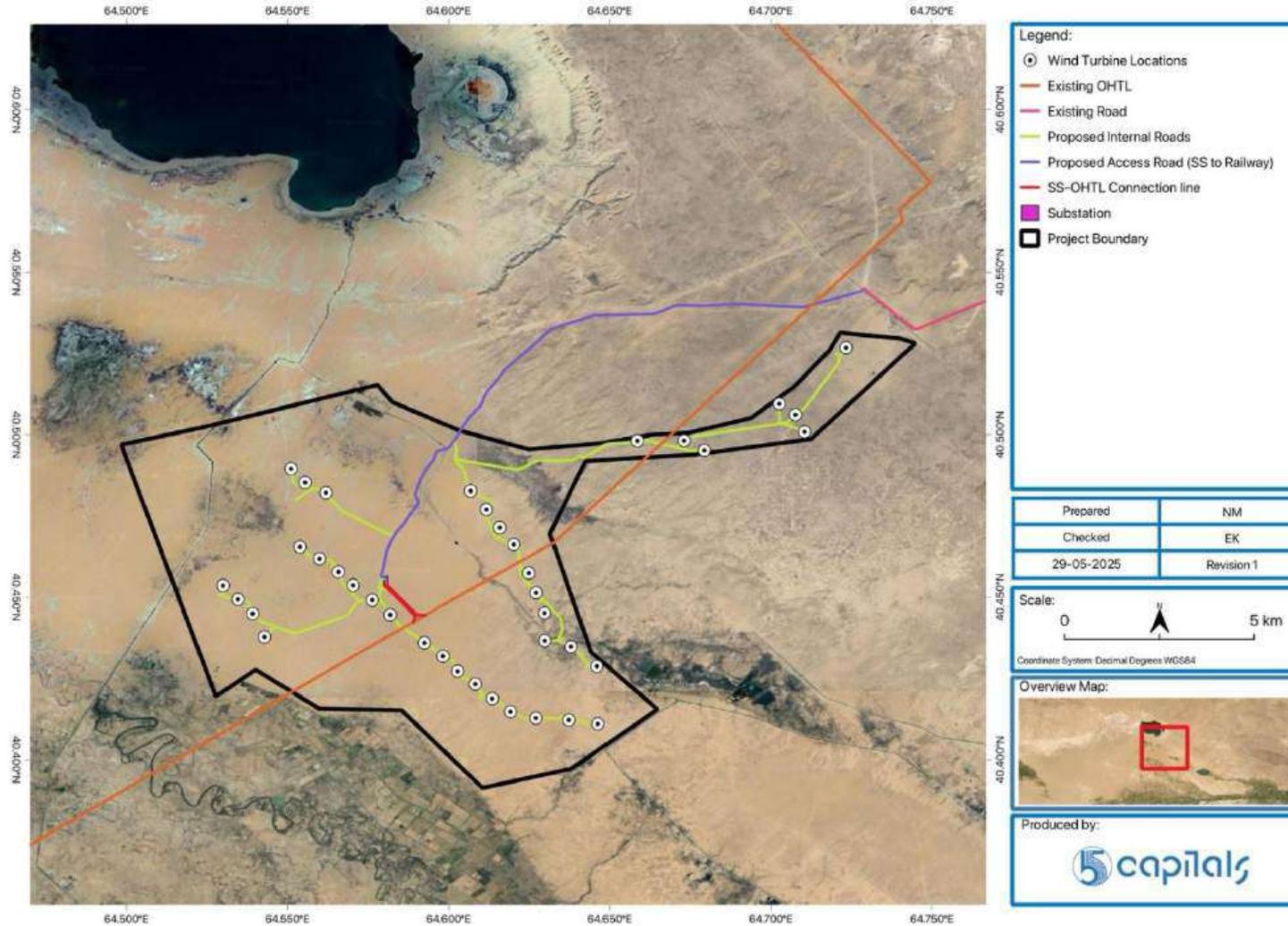


Figure 2-2 Project Location – Local Context

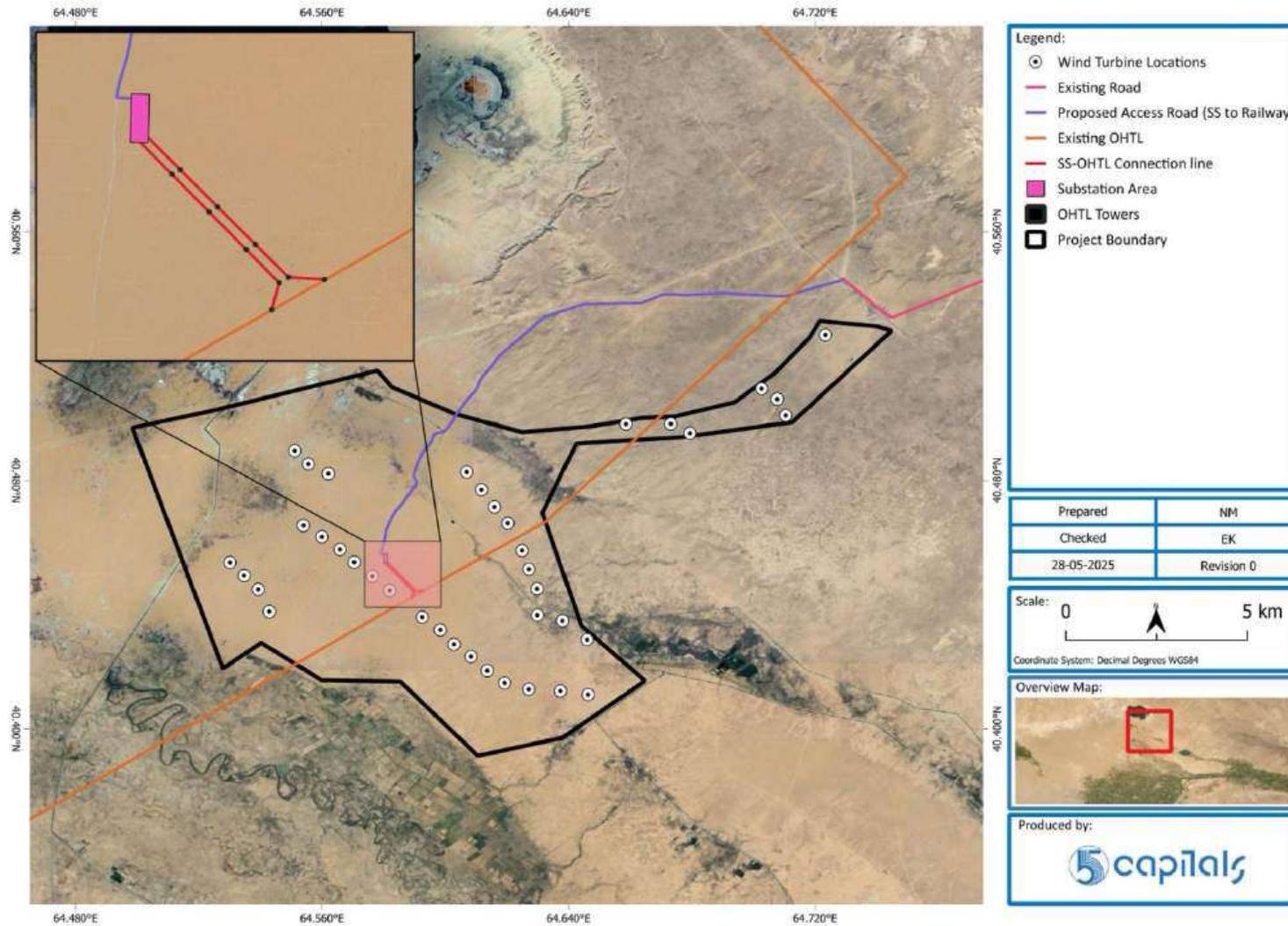
## 2.3 Project Description

The wind farm will consist of 39 WTGs, specifically Sany SI-19580 8 MW turbines.

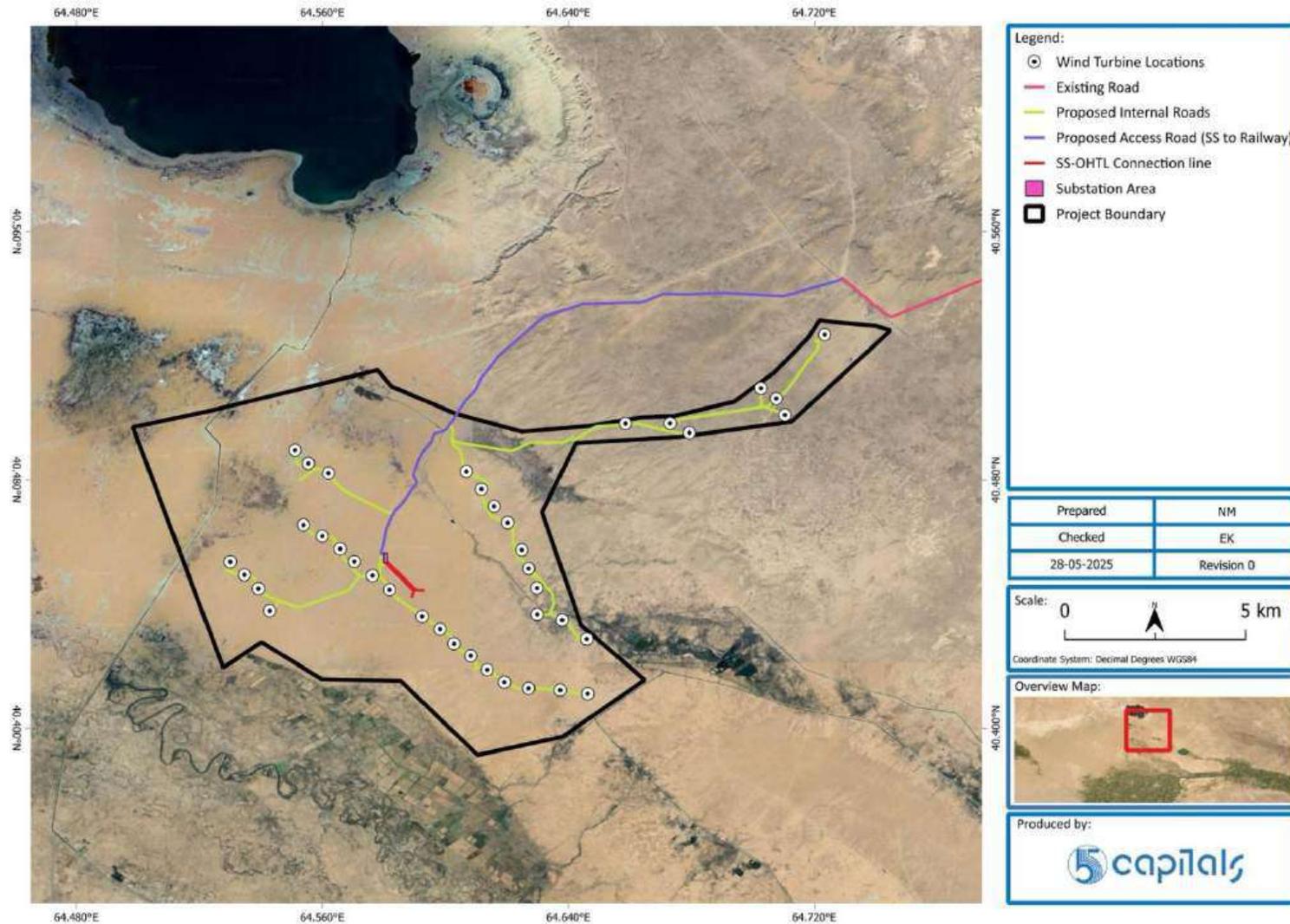
Other Project facilities will include:

- An AIS 33/500kV sub-station located at the centre of the proposed WF area.
  - The O&M team will have an administration office which will be located within the same boundaries as the sub-station.
- Each wind turbine will have a transformer where power will be evacuated using 33kV underground cables installed within the 12-m access road right-of way.
- OHTL: 1.5km 500kV OHTL line connecting to the Bash 500MW WF – Karakul OHTL. The 1.5km OHTL line will include 10 towers.
  - JSC National Electric Networks of Uzbekistan (NEGU) will be responsible for the operations and maintenance of the OHTL following transfer from ACWA Power after construction.
- Internal access roads: The project will include the construction of 49.3km of internal access roads.
- External access road: The Project will connect to the A379 highway through a 43.44 km access road.
  - Approximately 25 km of this road (from the highway to the railway station) is in good condition and is already being used for the Bash 500MW WF.
  - However, approximately 18.64 km of the road from the railway station to the proposed sub-station will need to be upgraded.

**Note:** Refer to the Project specific ESIA for more details about the Project facilities and table 5-1 for the land requirements for the above project facilities.



**Figure 2-3 Project OHTL connecting to the existing Bash-Karakul OHTL Route**



**Figure 2-4 Layout of the Internal & External Access Roads**

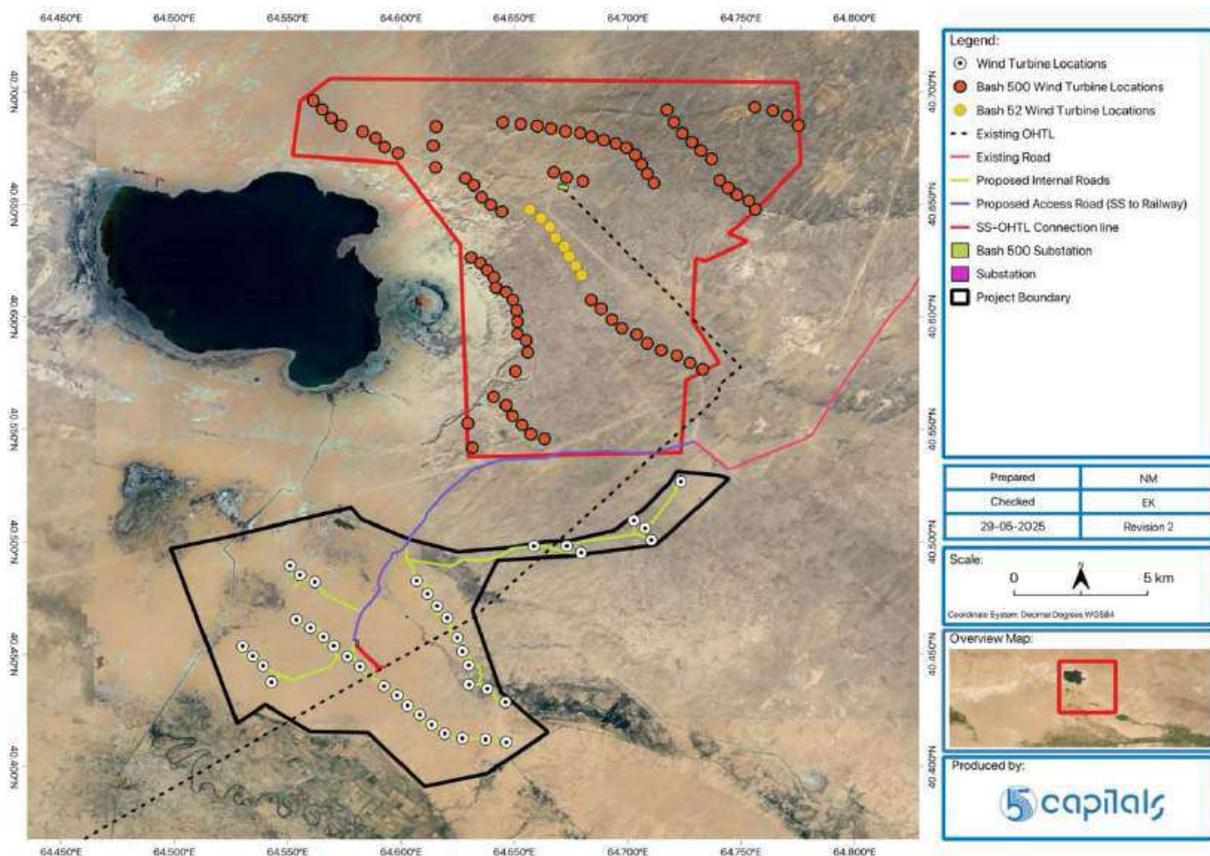
### 2.3.1 Facilities to be shared between the Project & Bash 500MW

As mentioned, previously, the proposed Project will include the construction of a 1.5km, 500kV OHTL which will connect to the Bash 500 MW Wind Farm – Karakul 162km, 500kV OHTL.

It is noted that the Bash 500MW WF and the 162km OHTL is also being developed by ACWA Power under the Project Company, FE ACWA Power Bash Wind LLC. The Bash 500MW WF underwent a separate ESIA and RAP process in accordance with the Environmental and Social (E&S) requirements of the European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB). The approved documents can be accessed via the links provided below

**Table 2-2 Bash 500MW WF ESIA Package documents (including the RAP)**

<b>ACWA POWER</b>	<a href="https://acwapower.com/en/projects/bash-wind-ipp/">https://acwapower.com/en/projects/bash-wind-ipp/</a>
<b>ADB</b>	<a href="https://www.adb.org/projects/56085-001/main">https://www.adb.org/projects/56085-001/main</a>
<b>EBRD</b>	<a href="https://www.ebrd.com/work-with-us/projects/psd/52772.html">https://www.ebrd.com/work-with-us/projects/psd/52772.html</a>



**Figure 2-5 Location of the Gijduvon 300MW Project in relation to the Bash 500MW WF & 162km 500kV OHTL**

In relation to the proposed Project, the Gijduvon 1.5kV OHTL will connect to the Bash 500MW WF-Karakul 500kV OHTL through a Line in Line Out (LILO) as shown in figure 2-5 above.

## 2.4 Construction Phase Land Requirements

The construction phase of the Project is expected to include the establishment of temporary laydown area(s) within the Project site. This will include the typical storage areas, camps and accommodation facilities. The temporary areas are expected to require approximately 7.72ha of land which will be restored by the EPC Contractor at the end of the construction phase. This land will be leased by the Project Company from the municipality for the duration of the construction phase (refer to Chapter 5 for details on the land Project Land requirements).

A 250m construction safety zone will be established by the Project around the WTGs, within which grazing<sup>5</sup> will not be permitted during the construction phase. This restriction is intended to protect herders and workers from safety risks associated with the movement of heavy machinery and equipment including the installation of WTG. Similarly, a 30m safety zone will be designated along access roads for the same purpose.

It is noted that the 33kV underground cables will be installed within the 12m access road right of way and no health protection zone or set back requirements will be required for the low voltage underground cables as they will be entirely within the existing 30m setback applied to the access roads.

The construction of the 500 kV OHTL will require permanent land take at the tower locations. The construction phase will also cause short-term temporary impacts, including a 30m wide construction corridor where grazing activities can resume once construction is complete.

Additionally, the construction of the substation and administration building will include a 3.46 ha fenced area designated for construction activities. As this area will be enclosed and have restricted access, no additional safety buffer will be established around it.

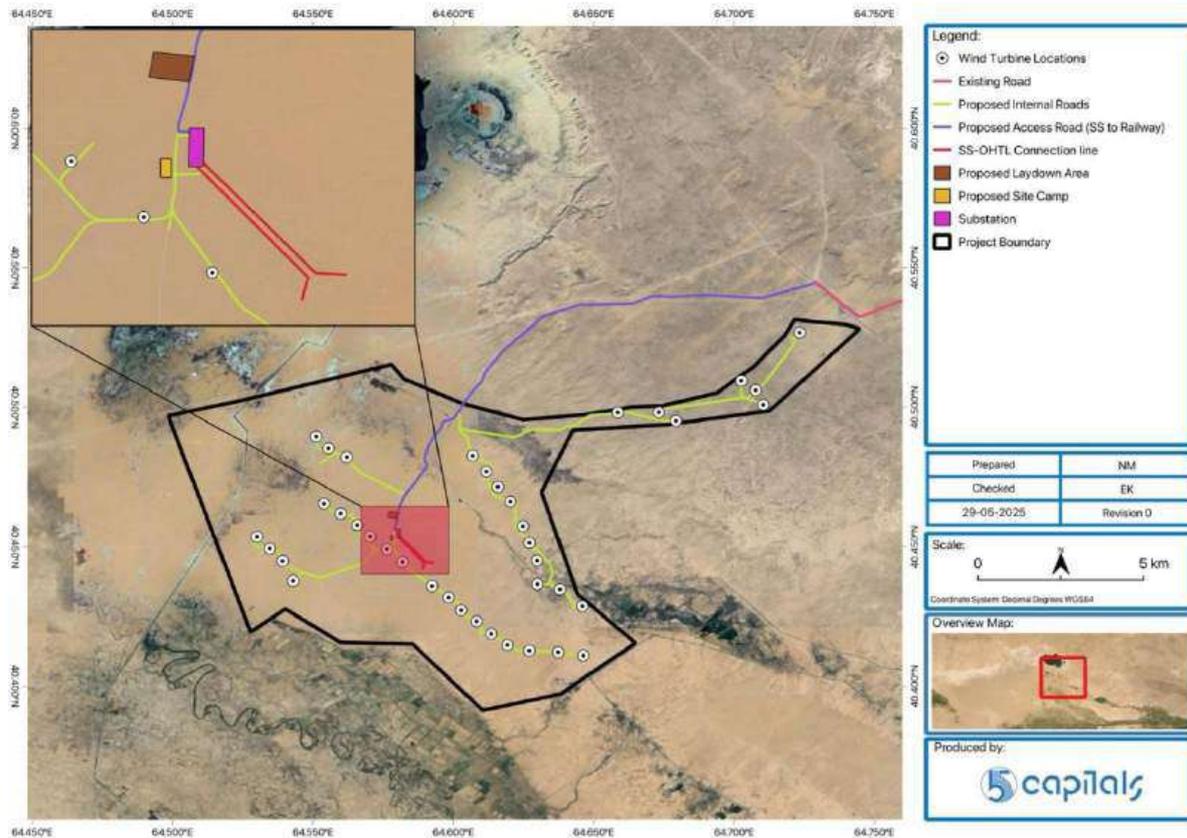
Once the project enters the operational phase, these safety zones will be available for grazing. However, the 250m operational safety zone (for WTGs) will remain restricted for any development of structures in line with the requirements set by the Sanitary Epidemiological Public Health Committee.

**Note:** The temporary construction site facilities area consisting of 7.72ha will include laydown yard, offices, other storage, batching plant, accommodation camps. Therefore, no additional land will be required.

Refer to chapter 5 for a breakdown on the project land requirements.

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<sup>5</sup> The project site is used exclusively for grazing purposes. However, one farmer was identified during the surveys and consultations conducted as part of the RAP. The farmer, referred to as FR1 in this report, uses the land within the project site solely for grazing, while his farming activities are located outside of the project boundaries. As the project will affect only grazing land, FR1, is therefore classified as a herder in this report.



**Figure 2-6 Location of the Laydown Area**

## 2.5 Operational Phase Land Requirements

The operation phase of the project will not require any additional land as the project facilities will have already been constructed. However, the following land use restrictions will be implemented during the operation phase of the project:

- OHTL Health Protection Zone (HPZ): There will be a 30m buffer from the outer most conductors on each side of the 500kV OHTL. No structures can be built within this zone. However, other activities such as herding<sup>6</sup> can be undertaken.
- A 250m radius health protection zone will also be established for the WTGs. No structures can be established in this area though grazing is allowed.
  - This is based on the outcome of a letter received from the Sanitary Epidemiological Public Health Committee dated 10<sup>th</sup> June 2024.
- Noise, shadow & flicker: This is based on the outcome of the modelling undertaken as part of the ESIA.
  - The letter from the Sanitary Epidemiological Public Health Committee dated 10<sup>th</sup> June 2024 also states that the noise generated by wind turbines in

<sup>6</sup> The project site is used exclusively for grazing purposes. However, one farmer was identified during the surveys and consultations conducted as part of the RAP. The farmer, referred to as FR1 in this report, uses the land within the project site solely for grazing, while his farming activities are located outside of the project boundaries. As the project will affect only grazing land, FR1, is therefore classified as a herder in this report.

residential areas should not exceed the standards specified in sanitary rules, norms and hygiene regulations. This requirement stipulates that no structures can be located within a 250 m radius of each WTG, and any existing structures within this area must be relocated (refer to section 9.2.2 for more details on the impacts of the 250m HPZ).

## 2.6 Project Milestones

The following table outlines key project milestones.

**Table 2-3 Key Project Milestone/Timeline Dates**

MILESTONE	DATE
Signing of the PPA	November 2023
Issuance of the Presidential Decree	March 2024
Land Allotment Order	March 2026
Limited Notice to Proceed (LNTP)	December 2025 – March 2026
Land clearance and pre-construction activities	March 2026
Full Notice to Proceed (NTP)	April 2026 <sup>7</sup>
Obtaining permit for Road Modification Works to Allow for Transportation	December 2025
WTG Installation – to include installation of WTG components including the tower, nacelle, and rotor.	July 2026 – April 2027
Commencement of Substation Construction	June 2026
OHTL Design Approval	May 2026
OHTL Construction (LILO)	January 2027
Commencement of WTG Reliability Tests	May 2027
Grid Available for Synchronization & Full Production (Earliest Connection Date)	April 2027
WF Substation Commissioning Tests Completion	April 2027
Interconnection and synchronization at wind farm and grid-level substation are completed (Communication is established & ready for evacuation)	April 2027
Early Commercial Operation Date (>10WTG for each site)	May 2027
Project Commercial Operation Date	July 2027
Project Taking Over	August 2027

<sup>7</sup> NTP will only commence once compensation has been fully paid to the PAPs.

## 3 LEGAL FRAMEWORK

### 3.1 National Regulations

#### 3.1.1 The Constitution of the Republic of Uzbekistan

The Constitution of Uzbekistan establishes the following fundamental legalities in relation to rights, liberties and duties pertaining to land access, livelihoods, socioeconomic infrastructure, social security, and general civil welfare.

##### **SOCIAL INFRASTRUCTURE**

- Articles 48, 49 and 50 provide that all residents have (i) the right to health and qualified medical care, (ii) the right to education, and (iii) the right to a favourable environment and reliable information on its condition.

##### **LAND TENURE**

- Article 41 affirms that everyone shall have the right to own property.
- Article 47 states that everyone shall have the right to housing, adding “In the cases and in the manner prescribed by law, the owner, deprived of his or her home, shall be provided with preliminary and equivalent compensation for the cost of housing and the losses incurred by him or her”.
- Article 65 follows-up with “Equality and legal protection of all forms of property shall be ensured in Uzbekistan, private property shall be inviolable”.

##### **LIVELIHOODS AND POVERTY ALLEVIATION**

- Article 43 requires the Government to take measures to ensure employment of citizens, to protect against unemployment and to reduce poverty.
- Article 57 highlights “The Government shall take the measures to improve the quality of life of vulnerable sections of the population, to enable this demographic to fully participate in social and public life and to enhance their ability to provide for their necessities of life independently.
- Article 67 states that entrepreneurs shall, in accordance with the law, have the right to conduct any livelihood/ business activity and choose its strategy independently.

##### **HUMAN RIGHTS**

- Article 4 states “The Republic of Uzbekistan shall ensure a respectful attitude toward the languages, customs and traditions of all nationalities and ethnic groups living on its territory and create the conditions necessary for their development”.
- Article 19 states that all citizens of Uzbekistan shall have equal rights and freedoms, and shall be equal before the law, without discrimination by sex, race, nationality, language, religion, social origin, convictions and social status.

- Articles 25 and 26 affirm that the right to life is an inalienable right of every human being and shall be protected by law, and that torture, violence or other cruel, inhuman, or degrading treatment or punishment is prohibited. Article 27 adds “No one may be arrested, detained, imprisoned, taken into custody or otherwise restricted in freedom except on lawful grounds”.
- Article 34 highlights “The State bodies, organizations, citizens' self-governing bodies and their officials shall allow everyone access to documents, resolutions and other materials, relating to their rights and legitimate interests”.
- Article 55 stipulates that everyone shall be guaranteed the right to have his/her case examined by a competent, independent, and impartial court within the time limits established by law to have his or her rights and freedoms restored.
- Article 58 states that women and men shall have equal rights

### 3.1.2 The Land Code (1998, amended in 2025)

The Land Code provides the fundamental framework for the classification and administration of land in the Republic of Uzbekistan. It establishes the principles and requirements for the allocation, utilization, and protection of land. The Code also defines legal forms of individual and collective land tenure, as well as various land categories subject to reservation and conditional reallocation.

#### **PROVISIONS ON LAND OWNERSHIP**

- Article 16 provides that all land in the Republic of Uzbekistan is a national treasure which must be managed on a sustainable basis as it underpins the life, economy, and welfare of the population.
- Article 24 regulates terms and conditions for leasing and owning land plots as well as inheriting land plots, allocation of agricultural land for foreign investments projects.
- Article 28 provides that payment for leased land parcels must be made in form of an initial instalment at the time of the leasehold establishment, and through subsequent 'annual rent' payments. The value of rent for leased land is based on the quality, location and water supply context of a given land parcel.
- Article 33 species the two documents, which serve to demonstrate legal tenure of land parcels, namely (i) state certificate on the right to possess a land plot, (ii) land-use agreements.
- Articles 59 specify land use categories for land resources in urban and rural jurisdictions, namely (i) land for urban building, (ii) land for common use, (iii) agricultural land use, (iv) forestry land use, (v) industrial, transport, communication and military land use, (vi) restricted land use (for wildlife, hazardous, cultural and recreational land), (vi) water supply land, and (vii) reserve lands.

#### **PROVISIONS FOR LAND EXPROPRIATION**

- Article 37 states “Withdrawal of the land parcel or its part for state and public needs is carried out with the consent of the landowner or with the agreement of the land user and lessee following the decision of the towns, viloyats, or the Cabinet of Ministers of the Republic of Uzbekistan”. The same article permits landowners with reasonable objection against expropriation of land parcels for public use to appeal the decision on withdrawal in the court of law.
- Article 41 states “Interference into the activity of owners of land parcels, landowners, land users, lessees and owners of households of state, economic and other authorities and organizations is forbidden, with the exception of cases of infringement of legislation by the owners of land parcels, landowners, land users and lessees”. The Article mandates compensation or whole refunds for loss of or damage to land assets and lost profits, due to infringement of land rights held by landowners, land-users, and land leasers.
- Article 43 states “Transfer of lands of agricultural purpose into other categories of land for non-agricultural needs is allowed in exceptional cases in accordance with this law and other legislative acts”.

#### **LAND ADMINISTRATION FRAMEWORK**

In addition, the Land Code establishes the institutional framework for the administration of land in Uzbekistan. The main governmental entities involved in the management of land resources include (but are not limited to):

- The Cabinet of Ministers of the Republic of Uzbekistan (as relevant)
- Council of Ministers of the Republic of Karakalpakstan (as relevant)
- State Assets Management Agency
- State Tax Committee
- Chamber of State Cadastres of the Cadastre Agency
- Regional Khokimiyats

#### **3.1.3 The Civil Code (1996, amended in 2025)**

The Civil Code (i) defines the legal status of participants in civil relations, (ii) sets out the basis and procedures for implementing the right to property, and (iii) regulates contractual obligations. It further establishes general rules for the withdrawal/ seizure of property, determination of the value of property, and the right to compensation, as well as conditions for deprivation of rights.

The code establishes that any person whose rights have been violated may demand full compensation for the losses caused, unless the law or the contract does not provide compensation for losses in a lower amount. Losses are understood to mean the expenses that the person whose rights have been violated, have produced or will have to produce in order to restore the violated right, the loss or damage to his/her property (real damage), as well as

the income/revenue that the person would have received under normal conditions of civil activity if his/her rights had not been violated (lost profit).

- According to Article 14, if the person has violated the law, revenue received as a result of this will be lost, the person whose rights were violated, has the right to demand compensation along with other losses, lost profits in the amount less than such profits.
- Article 83 defines immovable property as plots of land, subsoil, buildings, constructions, perennial plantings, and other property firmly connected with the land i.e. objects whose displacement without disproportionate damage to their purpose is impossible.
- Article 84 provides that the right of ownership and other real property rights, creation, transfer, restriction, and termination of these rights are subject to state registration. This means that without registration the right to real estate property does not enter into force.

### 3.1.4 Law No. 781 on procedures for the withdrawal of land plots for public needs with compensation (2024)

The Law provides for the expropriation of privately held land for public needs. It specifies conditions and procedures for lawful land withdrawal and reallocation and sets out compensation entitlements for legally registered land rights holders.

#### **PROVISIONS ON LAND WITHDRAWAL**

- Article 4 specifies 'public need' developments that warrant land withdrawal and reallocation. One amongst these is construction (reconstruction) of roads and railways of republican and local significance, airports, airfields, air navigation facilities and aviation technical centres, railway transport facilities, bridges, subways, tunnels, engineering facilities and lines of the energy and communications system, space activities facilities, main pipelines, engineering — communication networks, irrigation, and melioration systems.
- Article 13 requires the initiator of a project warranting land expropriation to identify the most suitable land parcel (with the least pre-existing priority assets), where technically feasible alternatives are available, and present substantiating documents to the resident Regional Khokimiyat.
- Article 14 provides that "The initiative for the implementation of the project and the withdrawal of land plots in this regard, and relevant substantiating materials, shall be considered by the Cabinet of Ministers of the Republic of Uzbekistan. Based on the results of consideration by the Cabinet of Ministers of the Republic of Uzbekistan, a resolution shall be adopted on the implementation of the relevant project. This Resolution refers to the Presidential Resolution referenced in the project ESIA and RAP reports.
- Article 14 further states "Where it becomes necessary to withdraw land plots in connection with the adoption by the Cabinet of Ministers of the Republic of Uzbekistan based on a resolution on the implementation of the project for public

need, all obligations assigned by this Law shall be performed by the khokimiyat of the relevant region”.

#### **PROVISIONS ON VALUATION COMPENSATION FOR LAND WITHDRAWAL**

- Article 23 specifies compensation entitlements for legal landholders subjected to land expropriation. These include compensation (at market value) for immovable property on affected land plots, compensation for plots under lifetime/ inheritable ownership, compensation for perennial plantations, and conditional compensation for certain transitional expenses leading up to the restoration of affected property and livelihoods.
- Articles 24 and 25 include several provisions to legalize both monetary and in-kind compensation for land, loss of income, immovable asset and any other impact occurred due to the land acquisition.
- Article 25 describes procedure and possible ways of compensation for physical displacement (resettling people in multi stored apartments and private houses).
- Article 25 further provides that “The amount of monetary funds specified as compensation in agreements, from the date of conclusion of which one month has expired at the time of the conclusion of an agreement with all right holders within three months, shall be paid subject to indexation in proportion to inflation officially announced by the State Committee of the Republic of Uzbekistan on statistics in the relevant months”.

#### **PROVISIONS ON VALUATION OF AFFECTED PROPERTY**

- Article 29 states “Assessment of objects of immovable property subject to demolition, including perennial plantings, as well as rights to a withdrawn land plot, shall be carried out before the start of the procedures for withdrawing the land plot or until the impact of the notice of withdrawal of the land plot on the value of the object of immovable property, as well as the rights to the withdrawn land plot.
- It adds “Assessment of the rights to the withdrawn land plot shall be carried out solely on the basis of documents confirming the state registration of rights to the land plot”.

#### **PROVISIONS ON VALUATION OF AFFECTED PROPERTY**

The Law further provides for legal recourse for any grievances and objections arising out of land expropriation proceedings.

- Article 34 states “The Compensation Commissions shall preliminarily consider disputes related to the provision of compensation to the right holder in the pre-trial procedure”, adding “A party that does not agree with the decision of the Compensation Commission may apply to the court in accordance with the procedure established by legislative acts”.

### 3.1.5 Resolution of Cabinet Ministers No. 146 on measures to improve the procedures for granting land plots for urban development activities and other non-agricultural purposes (2011 as amended in 2024)

The Resolution establishes the procedures for determining the amount of compensation for loss of owned or leased land, and associated loss of agricultural and forestry production.

- Article 2 states “Compensation for losses of owners, users, tenants, and owners of land plots, including lost profits, as well as losses of agricultural and forestry production, is made by legal entities to whom the land plot is provided (allocated), or whose activities cause restriction of rights to the land plot and deterioration land quality.
- Article 5 establishes that “Losses of owners, users, tenants and owners of land plots are determined and compensated in full (including lost profits) in the following cases:
- Article 6 mandates compensation for (i) privately owned land, (ii) immovable buildings/ structures, (iii) perennial plantings, and (iv) lost profit.
- Article 8 requires that the value of a land plot that is privately owned by legal entities and individuals is determined by appraisal organizations based on its market value at the time the decision to seize the land is made.
- Article 12 establishes that “the cost of lost profits of legal entities associated with the seizure of land plots with the demolition of buildings and structures located on it is determined based on the average annual net income for the last three years, taken from the financial activity report for the relevant years, and the period that is necessary for restoration of activities in a new location”.
- Article 12 further provides that “The amount of lost profits from withdrawn agricultural land is determined as the average annual net income received from the affected land area over the last three years, multiplied by four years which represent transitional time prior to full agricultural restoration on replacement land”.

### 3.1.6 Law of the Republic of Uzbekistan on Protection of Private Property and Guarantees of the Owner’s Rights (2012, as amended in 2022)

The law establishes the following requirements for compensation and notices related to demolition necessitated by land withdrawal:

- Demolition of a house, other structures, facilities or plantations located on the plot of land subject to withdrawal shall not be permissible unless prior and complete compensation of losses at market value is provided (Article 19).
- The state bodies shall notify the owner of the house, other structures, facilities or plantations about the reached decision in writing (undersigned receipt) no less than six months before the commencement of demolition with copies of a decision of the Council of Ministers of the Republic of Karakalpakstan, khokimiyat

of the province and city of Tashkent, respectively, attached to the notification (Article 19).

### 3.1.7 Decree of the President of the Republic of Uzbekistan on Measures for the Implementation of Modern Mechanism for the Protection and Rational Use of Pastures (dated January 30, 2025, No. DP-15).

Article 1 of this Decree states that the Committee for the Development of Sericulture and Wool Industry under the Ministry of Agriculture has been abolished. Based on this, the functions have been transferred as follows:

- Tasks and functions for pasture management will be transferred to the Veterinary and Livestock Development Committee.
  - The Veterinary Committee system will also include Research Institute of Karakul Sheep Breeding and Desert Ecology, as well as the Bukhara Research and Production Center for seed production of steppe-pasture forage crops.
- Tasks and functions for the development of silkworm cultivation and sericulture to the Ministry of Agriculture and the Uzbekipaksanoat Association.
- The Research Institute of Sericulture, as well as the Uzbek Research Institute of Natural Fibers – into the system of the Ministry of Agriculture.

Article 3 states that under the foundation of the Veterinary Committee, the Karakalpak, Bukhara, Jizzakh, Kashkadarya, Navoi, Samarkand, and Surkhandarya pasture farms in the form of a state institution shall be established.

Article 3 also states that the Veterinary Committee, the Cadastre Agency, the Uzbekcosmos Agency, the Ministry of Agriculture, together with the Council of Ministers of the Republic of Karakalpakstan and regional khokimiyats, by the end of 2025, shall ensure the inventory of pasture lands, their mutual compliance with the actual and state-registered area.

Article 7 states that the Veterinary Committee, together with the Ministry of Digital Technologies and the Ministry of Agriculture, shall launch the electronic platform “E-yaylov” by December 2025, providing for the efficient use of pastures.

Article 11 mandates the Ministry of the Agriculture to undertake the following:

- a) within one month, jointly with the Veterinary Committee and the Agency for State Assets Management, complete organizational issues related to the abolition of the Sericulture Committee.
- b) submit to the Cabinet of Ministers:
  - within two months, jointly with the Uzbekipaksanoat Association, proposals for the effective use of mulberry plantations provided to the Sericulture Committee.

- within two months, jointly with the Ministry of Justice and other interested ministries and departments, a draft Government resolution on measures to organize the activities of territorial pasture farms.
- within three months, a draft regulatory legal act determining the procedure for leasing pastures, the obligations of tenants in the field of rational use of pastures and preventing their degradation, as well as the reproduction of flora.
- within three months, proposals for amendments and additions to legislative acts arising from this Decree.
- within six months, a draft law "On Pastures" in a new version.

### 3.1.7.1 Applicability to the Project

Based on the changes in the regulation, the Project undertook consultations with the Head of the Bukhara Regional Sericulture and Wool Industry Development Committee on 17<sup>th</sup> March 2025. During the consultations, the following was established:

- The functions of SWID are currently in the process of being transferred to the Veterinary Committee. Additionally, the pastoral land under SWID in Bukhara are being transferred to the Bukhara Pasture Management Department.
  - According to the Head of the Department, the renaming of SWID Bukhara to Bukhara Pasture Management Department is solely a name change, with no impact on its functions. However, all consultations should now be directed to the new department.
- The clusters managing the grazing land within the site (Kokcha and Galaba LLC) will remain unaffected. The land allocated to them, including the number of livestock, will stay the same.
  - However, there may be potential changes to the duration of their lease agreements, which are currently set for 49 years. This matter is currently under review by the Cabinet of Ministers
- Herders with agreements under the clusters will have their agreements renewed throughout the year without disruption. Any changes to the land size or number of livestock will be determined by the terms outlined in their agreements with the clusters.
- Consultations should be undertaken with the Veterinary Committee once the transfer of functions is completed and they have started to implement their mandate.

Consultations held with Kokcha LLC and Galaba LLC in May 2025 indicated that no changes to their leases were anticipated. However, follow-up consultations in October and December 2025 revealed that both entities had entered into new lease agreements with the Veterinary Committee. Under the new conditions, the lease duration was reduced from 49 years to 10 years, and the leased land area was also decreased—from 297,190 ha to 160,000 ha for Kokcha LLC, and from 151,986 ha to 75,500 ha for Galaba LLC. These changes are noted to be unrelated to project implementation and are instead a result of the Presidential Decree on pastoral land.

Furthermore, of the 16 herders previously holding agreements with Kokcha LLC, only three (H5, H9, and H10) have not yet renewed their agreements, though they are currently in the process of doing so. Herders associated with Galaba LLC are likewise in the process of renewal. Based on consultations with both Kokcha and Galaba LLC, the terms of agreement with all herders are expected to remain unchanged (see Chapter 5 for further details).

Importantly, the changes in the leasing system for pastoral land could ultimately benefit the herders. With the introduction of the e-auction system in December 2025, herders will potentially have the chance to apply for long-term leases, replacing their current one-year contracts. This will provide them with greater security for their grazing activities.

To minimize any disruptions for both formal and informal herders, the Project will continue consultations with the Veterinary Committee and the Bukhara Pasture Management Department and the clusters during this transition period.

Additional telephone consultations with the Veterinary Committee and the Bukhara Regional Pasture Management Department on 3 February 2026 confirmed delays in the rollout of the pastureland e-auction system, and that the platform has not yet been established. While no revised timeline was provided for its implementation, these delays are not expected to affect ongoing herding activities for the PAPs.

### 3.1.8 Other Legislation

The following legislation provides for relevant socioeconomic aspects, including land access.

**Table 3-1 Overview of additional relevant laws and regulations**

LEGAL REQUIREMENT	SUMMARY
<p>Resolution of the Cabinet of Ministers No.911 from 16 November 2019 “On additional measures for enhancing modalities of providing compensation on withdrawal and allocation of land plots and safeguard the property rights legal and physical entities” (as amended in 2024)</p>	<ul style="list-style-type: none"> <li>• This Resolution establishes the main requirements and procedures for land withdrawal for state and public needs and implementation of investment projects, as well as the mechanism of compensation for land withdrawal to individuals and legal entities for demolished residential, industrial and other buildings, facilities and plantings. The decision for land acquisition for investment projects will be given only by Presidential and Cabinet of Minister’s decision which limits land expropriation by the local municipalities.</li> <li>• The Resolution stipulates that a land plot will be expropriated only after payment of full compensation at replacement rate and consultation with affected households. In this Resolution, public consultation and disclosure meetings are obligatory. Also, there are clear steps for the implementation of Land Acquisition and Resettlement activities.</li> <li>• The basic requirements and procedures of land withdrawal for state and public needs and realization of investment projects, as well as the purpose of compensation for land withdrawal are established in Resolution of the Cabinet of</li> </ul>

LEGAL REQUIREMENT	SUMMARY
	<p>Ministers No. 911 and the Regulation approved by this Resolution include:</p> <ul style="list-style-type: none"> <li>○ Withdrawal of land or part of it for state and public needs, including for realization of important social-economic and investment projects is made at the consent of the landowner or in coordination with the land user and tenant - at the decision of Supreme Council of the Republic of Karakalpakstan, councils of people's deputies of regions (Council of people's deputies), and Tashkent City Councils. Amended on 22 September 2021</li> <li>○ The decision of the Council of Ministers of the Republic of Karakalpakstan, regional and Tashkent city or district (city) authorities on demolishing the real estate object located in the expropriated land plot is accepted only when there is a positive conclusion of the judicial bodies.</li> <li>○ This Resolution regulates the procedure for compensation of losses and damages to owners as a result of land acquisition. Furthermore, the Resolution provides general rules for acquisition and compensation of lands including preparation of land withdrawal documents for both state and public needs and investment projects. The Resolution also allows for application of international standards; in case the project is financed by international organisations or banks.</li> <li>● With recent changed to current legislation PAPs will be compensated for: <ul style="list-style-type: none"> <li>○ Income loss due to the cancelling land-for land compensation method.</li> <li>○ Buildings/structures, even if they are illegal.</li> </ul> </li> </ul>
<p>Resolution of Cabinet of Ministers "On amending and adding to some decrees of the Republic of Uzbekistan, aimed the further improvement of registration of cadastral document on a real property" dated 21 September 2016 No.317 (as amended in 2018)</p>	<p>Resolution of Cabinet of Ministers "On amending and adding to some decrees of the Republic of Uzbekistan, aimed the further improvement of registration of cadastral document on a real property" dated 21 September 2016 No.317 (as amended in 2018)</p>
<p>Presidential Decree "On measures to improve the effectiveness of training and realizing projects with participation of international financial institutions and foreign government financial organizations" dated on 16 July 2018 No. 3857 (last amended in 2024. This act is currently being amended.</p>	<p>Establishes procedures for initiation and realisation as well as completion of started investment projects with foreign companies.</p>
<p>Presidential Decree No.5742 of June 17th 2019 "On measures for the effective use of land and water</p>	<p>Article 5 states "To establish a procedure according to which: irrigated agricultural lands are taken under special protection; it is not allowed to allocate these lands for non-agricultural purposes,</p>

LEGAL REQUIREMENT	SUMMARY
resources in agriculture" (as amended in 2025)	including for the construction of industrial and civil facilities (buildings and structures), "
Presidential Decree on additional measures to unconditionally ensure the guarantee of the property rights of citizens and business entities" No. 5491 dated August 3rd 2019	<ul style="list-style-type: none"> <li>• This decree outlines measures to guarantee property rights of citizens and entrepreneurs:               <ul style="list-style-type: none"> <li>○ Land allocation for state and public purposes can be carried out only after consultation with the affected citizen/entrepreneur and assessment of costs (income / expenses).</li> <li>○ The land allocation permit will be issued only after the payment of compensation to the citizen/entrepreneur for the value of property based on market prices and losses related to the land allocation.</li> <li>○ Losses / expenses incurred as a result of the illegal execution of documents by a state body (official), will be compensated at the expense of this state body from any funds other than the republican budget and / or shall be compensated by officials who committed this illegal act.</li> </ul> </li> </ul>
Presidential Decree on measures to ensure equality and transparency in land relations, reliable protection of rights to land and their transformation into market assets." June 8, 2021 (as amended 2024)	<ul style="list-style-type: none"> <li>• Along with several changes in land relations mentioned in the decree, the authority of district governors to allocate land directly is abolished. It is also prohibited to seize, reserve, or transfer land with any document. This means, from August 1, 2021, some rights on land of local governors will be restricted, and such restrictions will also affect the process of purchasing and leasing land.</li> <li>• This is now forbidden for local governors to transfer land to citizens, businesses, organizations by making an immediate decision.</li> <li>• Instead, agricultural land will be sold through an open electronic tender, and non-agricultural land will be sold through an online electronic auction with the right of ownership or lease.</li> <li>• Although district governors have been deprived of direct land allocation, the Council of Ministers of the Republic of Karakalpakstan, governors of regions, and Tashkent city saving a right to approve the results of the open electronic tender for agricultural lands.</li> <li>• However, according to the President's press service, all decisions of regional governors on land relations will be subject to legal review by the Department of Justice. In addition, the Council of Ministers of the Republic of Karakalpakstan, governors of regions, and the city of Tashkent will provide state organizations with land plots for state and public needs with the right of permanent use their decision.</li> </ul>
Tax Code of Uzbekistan (2020, as amended in 2025)	The Tax Code (TC) is a regulatory framework for taxation related matters for individuals and legal entities. This law regulates compensation for vulnerable group of people in terms of applying discounts or exemptions from property taxes, income tax and other taxes stipulated in the TC.
Family Code of the Republic of Uzbekistan (1998, as amended 2024)	<ul style="list-style-type: none"> <li>• Articles 23-24 of the Republic of Uzbekistan states that spouses have equal rights to own, use and dispose property if it is their joint ownership regardless of whether it was acquired in the name or financing of one of the spouses.</li> </ul>

LEGAL REQUIREMENT	SUMMARY
	<ul style="list-style-type: none"> <li>• Real estate or any other property cannot be sold or transferred in ownership without the consent of the other spouse.</li> <li>• Article 25 states that property belonging to each spouse before marriage, or received by one of them as a present according to the procedures of inheritance or according to other non-paid transactions is their private property unless it is determined that the other spouse has invested in it thus increasing the value (capital, repairs, reconstruction etc).</li> </ul>
<p>Law about Valuation Activities No 811- I (1999, as amended on 2025)</p>	<p>Current legal act establishes procedures of conducting valuation, responsibilities of valuator and valuation company as well as resolving disputes. It also states that if an international treaty of the Republic of Uzbekistan establishes rules other than those provided for by the legislation of the Republic of Uzbekistan on appraisal activities, then the rules of the international treaty shall apply.</p>
<p>Resolution of the Cabinet of Ministers No 1047 “On the Procedure for the formation and use of funds of centralised funds for the compensation to affected individuals and legal entities for the expropriation of land for the state or public needs” Dated 26th December 2018.</p>	<ul style="list-style-type: none"> <li>• This law defines the sources of compensation payments based on the type of projects. It also establishes Republican Centralised Fund (RCF) as the main body which is responsible for the compensation payments.</li> <li>• The Supervisory Board of the RCF is tasked with deciding on the allocation of funds for compensation.</li> </ul>
<p>Cabinet of Ministers Resolution No 122 “On measures for the further improvement of the system of social protection of the population &amp; widely introduction of modern ICT in the industry” (2021, as amended in 2024)</p>	<ul style="list-style-type: none"> <li>• The Ministry of Mahalla and Family Support of the Republic of Uzbekistan, the Ministry of Development of Information Technologies and Communications, the Cadastral Agency under the State Tax Committee, the Ministry of Employment and Labour Relations and other relevant ministries are obliged to develop and implement a single electronic database with the specified territorial boundaries and ensure its integration into an IT “Unified register”.</li> <li>• The legislations aim to ensure that the information system of the Public Services Agency under the Ministry of Justice “Unified Electronic Archive of the Public Service Agency” provides information on guardians and trustees through electronic information exchange between departments from the beginning to the end of enrolment (admission, transfer from class, transfer, graduation).</li> <li>• The Ministry of Finance together with the Ministry of Economic development and Poverty Reduction are obliged to conduct a regular analysis of the socio-economic situation of families receiving social benefits and material assistance through the Unified Register.</li> <li>• Based on the analysis of the socio-economic situation of families receiving social pensions and material assistance, budget allocations for social pensions and material assistance shall be distributed among the local budgets of districts and cities.</li> </ul>
<p>The Law of the Republic of Uzbekistan “On Amendments and</p>	<p>The purpose of this Law is to regulate relations in the field of appeals of individuals and legal entities to state bodies and state institutions, as well as their officials. The effect of this Law also</p>

LEGAL REQUIREMENT	SUMMARY
Supplements to the Law of the Republic of Uzbekistan "On Appeals of Individuals and Legal Entities"	extends to organizations with state participation and self-government bodies of citizens
Law of the Republic of Uzbekistan on Pastureland No 538 dated 21.05.2019 (as amended on 06/06/2022)	<ul style="list-style-type: none"> <li>• This law stated that specially authorized state bodies in the field of use and protection of pastures are the Ministry of Agriculture of the Republic of Uzbekistan, the State Committee of the Republic of Uzbekistan for Ecology and Environmental Protection and the State Committee of the Republic of Uzbekistan for Forestry (Article 5).</li> <li>• Legal entities and individuals can use pastures by obtaining land plots for rent, including sublease. Pastures can be provided to individuals and legal entities based on open electronic competition.</li> <li>• On the lands of the forest fund, pastures are used with the permission of the state forestry authorities. Based on an investment agreement or a public-private partnership, pastures that have gone out of circulation can be leased to citizens of the Republic of Uzbekistan, agricultural enterprises, as well as investors who are residents of the Republic of Uzbekistan, for agricultural production for a period that cannot be less than three years and must not exceed forty-nine years. Legal entities and individuals may sublease pastures put into use (without the right to transfer them to third parties) (Article 13).</li> <li>• The right to use pastures is terminated in cases of liquidation of a legal entity, death of an individual, expiration of the period for which pastures were provided, use not for the intended purpose, irrational use, withdrawal of pasture lands for public needs, voluntary refusal to use pastures (Article 19).</li> <li>• Pasture monitoring is a system for observing the state of pastures, and ongoing changes resulting from pasture use, to collect information on quantitative and qualitative data on pastures, assess and forecast their condition, and identify and eliminate negative processes. The monitoring is based on systematic observation data obtained through geobotanical surveys and pasture inventory. Monitoring data on the state of pastures in the Republic of Karakalpakstan and regions are periodically posted on the website of the Ministry of Agriculture of the Republic of Uzbekistan (Article 25).</li> <li>• Legal entities and individuals are obliged to compensate for the damage caused to pastures as a result of pollution, irrational use, degradation of pastures and other violations of pasture legislation (Article 26).</li> </ul>
Labour code (30.04.2023, as amended in 2025)	<ul style="list-style-type: none"> <li>• The Code's main objectives are to protect employee labour rights, ensure fair working conditions, support employers' rights in managing personnel, promote social partnerships, safeguard the legal interests of both employees and employers, and facilitate a well-functioning labour market.</li> <li>• The Labour Code outlines provisions for retrenchments. Employers must provide written notice of contract termination within specified timeframes. In cases of retrenchment due to technological changes, production shifts, or reduced work volume, the employer must give at</li> </ul>

LEGAL REQUIREMENT	SUMMARY
	<p>least two months' notice (Article 165). Upon termination, the employer must settle unpaid wages, compensation for unused leave, and other contractual payments on the termination day, or within three days if requested later. Bonuses must also be paid within three days (Article 172). Severance pays increases with work experience, starting at 50% of the average monthly salary for up to 3 years, reaching at least 200% for over 15 years (Article 173).</p>
<p>Law No. 642 "On Employment of population" (2021, as amended in 2025)</p>	<ul style="list-style-type: none"> <li>• An enterprise shall pay a lump-sum compensation to an employee who, as a result of an accident at work or an occupational disease, has completely or partially lost the ability to work due to the fault of the enterprise, and shall compensate for damage to health in the manner and amount established by the legislation of the Republic of Uzbekistan.</li> <li>• The amount of the lump-sum payment is determined by the collective agreement (contract) and should not be less than the annual income of the injured person.</li> <li>• The enterprise shall reimburse the injured worker for the costs of treatment, prostheses and other types of medical and social assistance if it is recognised that he/she needs them, as well as provide vocational retraining and employment of the injured person in accordance with the medical report or reimburse the costs for these purposes.</li> </ul>
<p>Presidential Decree No 108 "On increasing the amount of wages, pensions and benefits", issued on August 12, 2024</p>	<ul style="list-style-type: none"> <li>• This Decree introduced significant adjustments to salaries, pensions, and benefits to improve financial welfare in Uzbekistan. Key measures include a 15% increase in pensions and benefits starting 1st September 2024, alongside a new minimum old-age pension of UZS 834,000 and a minimum disability pension of UZS920,000.</li> <li>• From October 1st, 2024, the Decree set the minimum wage at UZS 1,155,000 and established a new basic calculation value of UZS 375,000 which is used to calculate various allowances.</li> </ul>

### 3.1.9 Right of Way

Procedures for the right of way in Uzbekistan are the same for legal entities and individuals. Right of way or limited use of land plot is determined in the Land Code of Uzbekistan, mainly in Article 30 and 86, and in Article 173 of Civil Code (by term servitude), also in Resolution of Cabinet of Ministries No.911 dated on 16.11.2019.

In accordance with Article 30 of the Land Code, Article 173 of the Civil Code, Article 30 of Annex 1 of the Resolution of Cabinet of Ministers No. 1060 dated December 29, 2018, right of way is established by agreement between persons demanding establishment of temporary land take and the owner, user, lessee, proprietor of foreign land plot. If they do not reach an agreement, the right of way shall be established in a limited order by court decision at the user's claim. The agreement on the right of way shall be subject to state registration and shall be preserved when the land plot is transferred to another person. Right of way agreement can be terminated in cases of the cessation of the reason according to which it was established.

Calculation and compensation of losses due to right of way agreement are performed in accordance with the Resolutions of Cabinet of Ministers No.146 from 25 May 2011 “On measures to improve the procedure for granting land plots for urban development activities and other non-agricultural purposes” and No. 911 from 16 November 2019 “On additional measures for enhancing modalities of providing compensation on withdrawal and allocation of land plots and safeguard the property rights legal and physical entities”.

Article 30 of Land Code (LC) determines the following cases for getting right of way:

- Passing or going across somebody's land parcel.
- Carrying out drainage work on the land parcel.
- Using the land parcel for laying and maintaining of irrigation,
- Engineering, electrical power and other lines and nets,
- Probing of water and water well (for drinking) on the land parcel.
- Taking cattle across the land parcel; and
- Temporary use of the land parcel for carrying out prospecting, research and other work; creating on the land parcel of protection forest plants and other nature protection objects; other servitudes.

### 3.1.10 Requirements on Health Protection Zone

#### 3.1.10.1 OHTL

An essential standard for establishing OHTL is SanPiN No.0350-17 “For the Protection of Atmospheric Air in Populated Areas of the Republic of Uzbekistan” (2017). These standard address health protection zones (HPZ), also known as setbacks. According to SanPiN No.0350-17, section 2.23.4, an HPZ must be established to protect the population from the effects of an OHTL's electric field. HPZ's are defined as the land along the route of a high-voltage OHTL in which the electric field strength exceeds 1 kV/m. For newly designed OHTL, buildings and structures must be set back the following distances either side of the OHTL<sup>8</sup>:

- 220kV – 25 m from each outer-most conductor
- 500kV – 30 m from each outer-most conductor
- 750kV – 40 m from each outer-most conductor
- 1150kV – 55 m from each outer-most conductor

All the OHTL planned under the Project has a voltage rating of 500 kV. Accordingly, the HPZ for the OHTL is 30 metres, from the outer most conductors on each side of the OHTL.

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<sup>8</sup> The HPZ (set back) is defined as the distance from the outermost wires in a direction perpendicular to the OHTL.

### 3.1.10.2 WF

There is no specific requirement that establishes Health Protection Zone for Wind Farm, as such technologies are relatively new in country context. Nevertheless, SanPiN 0350-17 states following:

“Paragraph 2.11. of this SanPiN states "For objects not included in the sanitary classification, with new, insufficiently studied technologies that have no analogues in the country and abroad, with the presence of chemical and biological substances of the first and second hazard classes in the emissions into the atmosphere, the width of the HPZ is set individually in each specific case based on preliminary calculations and possible impact on human health". Based on consultations with Sanitary and Epidemiological Wellbeing Agency (local regulator) over formal correspondence the HPZ for Gijduvon 300MW WF was established as 250 meters.

### 3.1.11 Decree of the Cabinet of Ministers of the Republic of Uzbekistan No.1050 on approval of rules for protection of power grid facilities (2018)

This decree establishes the procedure for mandating Grid Security Zones (GSZ) for power grid facilities, as well as special conditions for using land located within these exclusion zones, to ensure sustainable operation of the said facilities, with minimum risk to public health and safety, as well as vulnerable wildlife.

Grid Security Zones for power grid facilities shall be established on both sides of the power transmission line from the outermost wires and along the perimeter of substations at the following distances for voltages:

- 110kV – 20 m from each outer-most conductor
- 220kV – 25 m from each outer-most conductor
- 500kV – 30 m from each outer-most conductor

## 3.2 Lenders Requirements

ACWA Power are seeking an amount of Project finance from financial institutions who have their own internal environmental & social investment policies/standards/safeguards. At this stage, it is understood that the Asian Development Bank (ADB), Asian Infrastructure Investment Bank (AIIB) and some Equator Principles Financing Institutions (EPFIs) may be involved in the financing.

### 3.2.1 Asian Development Bank (ADB)

#### 3.2.1.1 ADB Safeguard Policy Statement (SPS)

ADB Safeguard Policy Statement (SPS) of 2009 sets out the policy, objectives, scope, triggers and principles for the following three key Safeguards Requirements:

- Environmental Safeguards: requires screening and assessment of projects according to type, location, scale, and sensitivity and the magnitude of their potential environmental impacts, including direct, indirect, induced, and cumulative impacts.
- Involuntary Resettlement Safeguards: include screening and assessment of projects impacts of land acquisition and involuntary resettlement and proposes measures to address the impact identified.
  - The determination of the project categorization is provided in the section below.
- Indigenous Peoples Safeguards: screen and assess projects on impacts on Indigenous Peoples according to magnitude of impact in terms of customary rights of use and access to land and natural resource, socio-economic status, cultural and communal integrity, health, education, livelihood, social security status, the recognition of indigenous knowledge, and the level of vulnerability of the affected Indigenous Peoples community.
  - This Safeguard is not applicable to the proposed project based on the assessment undertaken in the Socio-economic Chapter below.

#### **INVOLUNTARY RESETTLEMENT SAFEGUARD (SR2)**

ADB's Involuntary Resettlement Safeguard Requirements aims to avoid involuntary resettlement wherever possible; to minimise resettlement by exploring project and design alternatives; to enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups.

SR2 also applies to full or partial, permanent or temporary physical and economic displacement resulting from (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas.

ADB also requires that the client disseminates information to the affected persons and consult with them in a manner that commensurate with the anticipated project impacts on the PAPs. The client is required to inform and consult with the affected persons on resettlement and compensation options and to provide them with project-related information during resettlement planning and implementation. The information should be disclosed in a timely manner, in an accessible place, and in a form and language that the affected persons can understand.

According to ADB, a project's involuntary resettlement category is determined by the category of its most sensitive component in terms of involuntary resettlement impacts. If the number of significantly affected PAPs is 200 or above, the project is considered a Category A project for involuntary resettlement. On the other hand, a project is categorised B for Involuntary Resettlement if less than 200 persons will experience major impacts, which are defined as (i) being physically displaced from housing, or (ii) losing 10% or more of their productive assets.

On this basis, the Gijduvon 300MW WF is categorised B. This is because the involuntary resettlement impacts are not deemed to be significant as the number of the PAPs expected to be physically displaced from housing or lose 10% or more of their productive assets is less than 200. Further details are provided in the section below.

### SUMMARY OF IMPACTS

Surveys undertaken as part of this draft RAP identified 5 government agencies, 2 livestock clusters, and Uztransgaz. Additionally, there are 78 PAHs comprising of 483 PAPs who will be affected by the Project.

**Table 3-1 Summary of affected PAHs/PAPs**

IDENTIFICATION GROUP	PAHs	PAPs
<b>Government Agencies</b>	5	
<b>Livestock Clusters</b>	2	
<b>Gas Operator</b>	1	
<b>Herders</b>	22	130
<b>Farmers<sup>9</sup></b>	1	5
<b>Workers</b>	55	348
<b>Total</b>	78	483
<b>Total number of herders who will be physically displaced including their workers</b>	<b>18</b>	<b>120</b>
<b>Number of significantly affected herders</b>	<b>5</b>	<b>34</b>
<b>Number of significantly affected workers</b>	<b>13<sup>10</sup></b>	<b>86</b>
<b>Total number of significantly affected herders + workers</b>	<b>18</b>	<b>120</b>

The WF will be located within an investigation area covering approximately 12,626ha. However, the actual land requirements will be determined by the Project's physical footprint

<sup>9</sup> The farmer (coded as FR1) uses the land within the project site exclusively for grazing purposes. His farming land is located outside the project boundaries. Since only the grazing land will be affected by the project, he is therefore counted among the herders in this report. This brings the total number of herders to 23, including the farmer, based on land use.

<sup>10</sup> There are 17 herders who will experience significant impact. However, of the 17, four share the same households as the significantly affected herders. These include H4 and H4W4, H5 and H5W2, H7 and H7W1, as well as H14 and H14W1, who are from the same households.

rather than the entire area. Based on the current Project layout, it is estimated that only 117.49ha—approximately 0.93% of the total area—will be used during both the construction and operational phases. This limited land take will allow most of the area to remain accessible for continued use by existing herders and their workers.

The proposed Project will affect grazing land currently used by herders and workers with livestock. During the construction phase, impacts on grazing land will result from the Project footprint, temporary laydown areas, and the establishment of safety construction zones—250 meters around WTGs and 30 meters along access roads—where grazing will be restricted to ensure the safety of both herders and their livestock. It is noted that grazing will be possible within these safety zones during the operational phase though no structures can be established.

In addition, operation phase noise impacts from the operation of the WF will result in the physical displacement of five herders (H4, H5, H7, H12 and H14) and 17 workers<sup>11</sup>. It is noted that while the workers do not own the affected assets, they rely on the structures to be able to undertake their herding duties. However, the herders (who own the assets) have access to unaffected land outside the Project footprint, where their structures can be relocated.

#### **SIGNIFICANTLY AFFECTED PAHs AND PAPs**

Project categorisation under ADB SPS SR2 also considers the number of persons who lose 10% or more of their productive (income-generating) assets. As shown in the table 3-1 above, a total of 18 PAHs comprising 120 PAPs will be significantly affected by the Project. While the 10% or more loss—primarily related to grazing land—will be temporary during the construction phase, five herders will experience physical displacement due to the impact on their structures. These structures will need to be relocated to areas outside the Project footprint.

Based on this, the Project is classified as Category B and the impacts will be addressed in accordance with the entitlements set out in this draft RAP.

#### **3.2.1.2 ADB's Social Protection Strategy, 2001**

The Social Protection Strategy requires the Borrower to comply with applicable national labour laws in relation to the project, and take the measures to comply with the core labour standards of the International Labor Organisation (ILO).

#### **3.2.1.3 ADB's Access to Information Policy (2018)**

The objective of the Information Policy is to promote stakeholder trust in ADB and to increase development impact of ADB activities. The policy reflects ADB's commitment to transparency, accountability, and participation by stakeholders in ADB-supported development activities. It

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<sup>11</sup> Workers who will be affected by the physical displacement of the herders include H4W1, H4W2, H4W3, H4W4, H5W2, H5W3, H5W4, H5W5, H5W6, H5W7, H7W1, H12W1, H12W2, H12W3, H14W1, H14W2, H14W3.

recognises the right of people to seek, receive, and impart information about ADB's operations.

#### **3.2.1.4 ADB's Gender and Development Policy, 1998**

ADB's policy on gender and development (GAD), approved in 1998, adopts gender mainstreaming as a key strategy for promoting gender equity. This requires gender concerns to be treated as a cross-cutting theme influencing all social and economic processes.

The GAD policy provides a policy framework; introduces institutional mechanisms to address gender concerns in ADB's programme of activities; and supports a greater emphasis on gender issues in all ADB operations.

#### **3.2.1.5 Accountability mechanism (2012)**

The Accountability Mechanism aims to offer an independent and effective platform for individuals negatively impacted by ADB-supported projects to express their concerns, seek solutions to their issues, and request a compliance review of alleged breaches by ADB of its operational policies and procedures that may have caused or could potentially cause them direct and significant harm.

The key change introduced in the 2003 to the Accountability Policy was the creation of two distinct yet complementary stages within the Accountability Mechanism:

- Consultation phase, which involves a Special Project Facilitator (SPF) to address the concerns of individuals impacted by ADB-funded projects using informal and flexible approaches; and
- Compliance review phase, which involves a Compliance Review Panel (CRP) to examine alleged breaches of ADB's operational policies and procedures that have caused or could cause direct and significant harm to affected people.

### **3.2.2 Asian Infrastructure Investment Bank (AIIB)**

AIIB's ESS 2 (Land Acquisition and Involuntary Resettlement), states that If the Project is likely to involve Involuntary Resettlement, AIIB requires the Client to address this in the social section of the assessment report, complemented by more in-depth coverage, as required under ESS 2.

The Client covers this in a plan or framework, as applicable, which may be called a land acquisition and resettlement plan, land acquisition plan or resettlement plan (LARP/LAP/RP) or, in the case of a framework, a land acquisition and resettlement planning framework, land acquisition planning framework or resettlement planning framework (LARPF/LAPF/RPF). This plan or framework is to be provided to AIIB as a freestanding document, an annex to the assessment report, or incorporated as a recognizable element of the report.

ESS 2 requires meaningful consultations to be undertaken with persons to be displaced by the project including vulnerable groups to facilitate their informed participation process. This

participation requires their involvement in planning, implementation, monitoring, and evaluation of the LARP/LAP/RP.

The Project is required to establish a suitable project-level grievance redress mechanism (GRM) to receive and facilitate resolution for the concerns displaced by the project and inform them about its availability. Additionally, AIIB has a Project-Affected People's Mechanism (PPM) where affected people may raise their concerns regarding the environmental and social aspects of the AIIB-financed project with the client and AIIB during the preparation and implementation of the Project<sup>12</sup>.

AIIB also requires that compensation and involuntary resettlement entitlements are paid before any related physical or economic displacement takes place under the project. In addition, the project should take gender issues into account in determining and paying compensation and providing other entitlements.

### 3.2.3 Equator Principles

The Equator Principles (EP) is a risk assessment framework used by financial institutions to determine, assess and manage the environmental and social risk in Project's financing. Currently, over seventy-five major financial institutions from around the world have adopted the EPs. These financial institutions operate in more than 100 countries worldwide.

EPIV establishes the minimum E&S standards to be adopted by EP Financial Institution (EPFIs) as those from IFC Performance Standards on Environmental and Social Sustainability (Performance Standards), the World Bank Group Environmental, Health and Safety Guidelines (EHS Guidelines) and/or the relevant host country laws, regulations and permits that pertain to environmental and social issues.

#### 3.2.3.1 IFC PS 5: Land Acquisition and Involuntary Resettlement

PS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) because of project-related land acquisition and/or restrictions on land use. Where involuntary resettlement is unavoidable, it should be minimized and appropriate measures to mitigate adverse impacts on displaced persons and host communities should be carefully planned and implemented.

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<sup>12</sup> The submission to PPM can be undertaken via this website: <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/submission/index.html>

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All the IFC Performance Standards include requirements for an amount of stakeholder engagement (either at the ESIA stage, or as part of the future ESMS implementation) and therefore, the project will require certain engagement. IFC Performance Standard 1 on “Social and Environmental Assessment and Management Systems” states “Stakeholder engagement is the basis for building strong, constructive, and responsive relationships that are essential for the successful management of a project’s environmental and social impacts.

The preparation of this draft RAP has also utilised IFC PS Guidance Note 5: Land Acquisition and Involuntary Resettlement and the IFC’s Handbook on Preparing a Resettlement Action Plan.

### 3.3 Gap Analysis between National and Lenders' Requirements

**Table 3-2 Gap Analysis Between National and Lender Standards**

ELEMENT	ADB's SPS SR 2, ADB's GENDER & DEVELOPMENT POLICY, 1998 ADB ACCESS TO INFORMATION POLICY, 2018	IFC PS5	AIIB ESS2	UZBEKISTAN LEGISLATION	MEASURES TO BRIDGE THE GAP
<b>Avoid or minimise displacement</b>	The Project will avoid involuntary resettlement whenever possible to minimise involuntary resettlement by exploring project design alternatives. Avoidance and minimisation are also done via design and optioneering.	The client will avoid, and when avoidance is not possible, minimise displacement by exploring alternative project designs.	ESS2 requires projects to avoid involuntary resettlement where feasible or minimize involuntary resettlement by exploring project alternatives.	The land belongs to the state and can be withdrawn for state and public needs including for realization of important socio-economic and investment project.	<p>The Project site has been allocated for the development of the project. The initial layout consisted of 41WTGs, but this has been reduced to 39WTGs which reduces the project footprint. Micrositing was also undertaken to adhere to the buffer zones required from the gas pipeline, water channel and the 250m HPZ.</p> <p>Additionally, it is noted that the project will not utilise all the 12,626ha allocated to it. Additionally, the OHTL alignment was reduced from the initial 25km OHTL connecting to the Bash 500MW substation to a 1.5km OHTL which includes a LILO connection to the Bash 500MW 500kV OHTL to Karakul substation. This significantly reduces the impact on grazing land.</p> <p>The external access road selected also avoids passing through populated areas and farmlands which reduces the impacts. (refer to chapter 4 below).</p> <p>Details of the project alternative and mitigation &amp; management measures for other E&amp;S aspects are detailed in the project specific ESIA.</p>
<b>Planning process</b>	The client will prepare a resettlement plan/livelihood restoration plan including collection of census data of the affected persons.	Requires that a Client prepares a RAP in case of Projects involving physical and economic displacement including collection of appropriate socio-economic baseline data of the PAPs	Requires a Resettlement Plan in case of the project resulting into physical and economic displacement. This also includes a requirement for the project to conduct a survey of land and assets, full census of displaced persons, and an evaluation of socio-economic conditions specifically related to the risks and impacts of such displacement and an identification of gender differentiated sources of livelihoods, including informal ones.	There is no requirement to prepare an integrated standalone RAP. There is no comparable requirement for conducting a socio-economic survey.	This draft RAP has been developed for the proposed Project to meet this requirement. It includes the feedback the project affected people and other local stakeholders consulted during its preparation and that of the ESIA documentation.
<b>Eligibility for compensation</b>	ADB identifies 3 categories of PAPs: Persons with formal legal rights to land lost in its entirety or in part. Persons who lost the land they occupy in its entirety or in part who have no formal legal rights to such land, but who have claim of such lands that are recognizable under national laws.	PS 5 identifies 3 main categories of PAPs: <ul style="list-style-type: none"> <li>• Those who have formal legal rights to the land or assets they occupy or use.</li> <li>• Those who do not have formal legal rights to land or assets, but have</li> </ul>	ESS 2 recognises persons with legal rights. Additionally, it requires displaced persons without title to land or any recognisable legal rights to land, to be eligible for, and provided with resettlement assistance and compensation for loss of assets not related to land, in accordance with cut-off dates established in the	The Uzbek law only recognises people with recognisable rights who are entitled to compensation.	The eligibility for compensation and scope of this draft RAP includes all PAPs including those without any recognisable legal rights to the land that they are using. Refer to Chapter 10 for details on the eligibility and entitlements.

ELEMENT	ADB's SPS SR 2, ADB's GENDER & DEVELOPMENT POLICY, 1998 ADB ACCESS TO INFORMATION POLICY, 2018	IFC PS5	AIIB ESS2	UZBEKISTAN LEGISLATION	MEASURES TO BRIDGE THE GAP
	<p>Persons who lost the land they occupy in its entirety or in part who have neither formal legal rights nor recognised or recognizable claims to such land.</p> <p>ADB also requires that: Those with no formal/recognizable right on the land are entitled to be compensated for their non-land assets at replacement cost and for rehabilitation assistance.</p> <p>Land compensation (instead of cash) for PAPs whose livelihoods are land-based is preferred.</p>	<p>a claim to land that is recognised or recognisable under national law.</p> <ul style="list-style-type: none"> <li>Those who have no recognizable legal right or claim to the land or assets that they occupy or use.</li> </ul>	<p>RAP and to include them in the consultation processes.</p> <p>Special resettlement assistance should also be provided to women-headed households and vulnerable households.</p>		
<b>Inventory of affected assets &amp; establishment of a cut-off date</b>	<p>An inventory of displaced persons and their assets will be documented. In addition, the client will establish a cut-off date for eligibility. Information regarding the cut-off date will be documented &amp; disseminated throughout the project area.</p>	<p>The client will carry out an inventory of affected land and assets at the household, enterprise, and community level.</p> <p>This will also include establishment of a cut-off date for eligibility information of which will be documented and disseminated throughout the project area.</p>	<p>Conduct land survey and census as early as feasible during project preparation to establish clear cut-off dates for eligibility and to prevent encroachment.</p>	<p>The asset compensation methodology requires for the client to carry out an inventory for the affected assets. However, this does not include any specific requirement for the establishment of a cut-off date.</p>	<p>The cut-off date for the Project site was publicly disclosed to all the PAPs in accordance with ADB, IFC PS 5 requirements. Inventory surveys have been conducted with PAPs individually to record and assess types of loss.</p>
<b>Grievance mechanism</b>	<p>The client is required to establish a mechanism to receive and facilitate the resolution of affected persons' concerns and grievances about physical and economic displacement and other project impacts, paying particular attention to the impacts on vulnerable groups</p>	<p>The client is required to establish a grievance mechanism in accordance with the requirements set out in PS1 in order to be able to address any specific project concerns about the compensation process. The GM will include a recourse mechanism designed to resolve disputes and complaints in an impartial manner.</p>	<p>The client is required to establish a suitable Project-level grievance redress mechanism to receive and facilitate solution of the concerns of persons displaced by the project and inform them of its availability.</p> <p>The GRM should also be designed to address displaced persons gender related concerns and gender-based violence.</p>	<p>In case of a disagreement with the decision to withdrawal land, the landowner/user can appeal the decision in court. There is, however, no requirement for a project specific GM. Additionally the national legislation does not allow for anonymous complaints to be filed and processed.</p>	<p>A grievance mechanism has been set up as part of the SEP and draft RAP for the Project to allow the PAPs and other stakeholders to submit their grievances.</p> <p>The GRM established for the project also allows stakeholders to submit their grievances anonymously.</p>
<b>Information disclosure</b>	<p>The Client will provide relevant resettlement information, including information on the resettlement framework, resettlement plan and monitoring reports in a timely manner, in an accessible place and in a form and language(s) understandable to affected persons and other stakeholders. For illiterate people, other suitable methods will be used.</p>	<p>Disclosure of relevant information and participation of Affected Communities and persons will continue during planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with objectives of PS5.</p>	<p>Requires the disclosure of the RAP, including documentation of the consultations process in the project area, in a timely manner and in accordance with the ESS 1 sections 19 and 22. This includes conducting disclosure in a timely, accessible, gender sensitive, and inclusive and culturally appropriate manner and location, and in a form and language(s) understandable to the Project affected people.</p>	<p>No requirement for information disclosure exists in Uzbekistan through the land withdrawal and compensation process.</p>	<p>PAPs will be provided with relevant information throughout the implementation of this RAP as per the ADB, and IFC PS 5 requirements.</p>
<b>Stakeholder consultation</b>	<p>The client will conduct meaningful consultation with affected persons, their host communities, and civil society for every project and subproject identified as having involuntary resettlement impacts.</p> <p>The ADB Access to Information Policy states that information should be provided to project</p>	<p>Consultations shall be conducted to allow informed participation of those affected by the project.</p>	<p>The client will carry out meaningful consultations with persons to be displaced by the project and other stakeholders and facilitate their informed participation in the consultations.</p>	<p>Requires matters of local importance to be publicly discussed with local authorities, and PAPs with formal rights</p>	<p>To close this gap, the project will consult with the identified PAPs, vulnerable groups and other relevant stakeholders in line with the lenders' requirements throughout the land acquisition, draft and final RAP implementation, construction and operation</p>

ELEMENT	ADB's SPS SR 2, ADB's GENDER & DEVELOPMENT POLICY, 1998 ADB ACCESS TO INFORMATION POLICY, 2018	IFC PS5	AIIB ESS2	UZBEKISTAN LEGISLATION	MEASURES TO BRIDGE THE GAP
	<p>affected people and other stakeholders in a way that allows them and other stakeholders to provide meaningful inputs into project design and implementation.</p> <p>The Gender &amp; Development Policy requires gender sensitivity, analysis, planning, mainstreaming, agenda setting as part of the project. Mainstreaming includes consideration of gender issues in all aspects accompanied by efforts to encourage women's participation in the decision-making process in development activities</p>		<p>ESS 2 requires for measures to ensure meaningful participation in consultations, including through appropriate meeting times, transport, childcare support, as well as conducting women-only meetings when appropriate. Additionally, attention should be paid to people with disabilities, vulnerable groups especially those below the poverty line, the landless, the elderly, women, and children.</p>		<p>processes. A Stakeholder Engagement Plan (SEP) will also be developed for the project.</p>
<b>Vulnerable groups</b>	<p>The client will identify individuals and groups who may be differentially or disproportionately affected by the project because of their disadvantaged or vulnerable status. The client will ensure that the standards of living of the displaced poor and other vulnerable groups are improved to at least national minimum standards and not merely restored.</p>	<p>PS 5 requires that special attention is provided to the needs of the poor and vulnerable to assist in restoring/improving their pre-project livelihoods.</p>	<p>The client will identify the vulnerable groups affected by the project and take into consideration differentiated impacts of the involuntary resettlement on these groups. Additionally, this includes the requirement to improve the overall socioeconomic status and standards of living of the displaced poor and other vulnerable groups.</p>	<p>The Tax Code regulates compensation of vulnerable groups in terms of applying discounts or exemptions from property taxes, income tax but does not provide requirements for additional support to vulnerable groups in relation to helping them improve their livelihoods.</p>	<p>Vulnerable groups identified and will be provided with assistance in accordance with ADB, and IFC PS requirements. This will also include support to ensure that the livelihoods of the poor and vulnerable PAHs/PAPs are enhanced to at least the national minimum standard.</p>
<b>Loss of Jobs</b>	<p>ADB requires for the client to compensate for loss of income and help restore the income earning capacity of those affected. This should also include providing equal opportunities for women and men in accordance with the Gender Development Policy.</p>	<p>Assistance should also be made available to the employees of business to compensate for their temporary loss of employment.</p>	<p>Requires the preparation of the RAP to include the income restoration strategy.</p>	<p>Legislation requires providing minimum 2 months notice before retrenchment and compensating at least average monthly salary</p>	<p>The PAPs will be provided with compensation based on the entitlements in the approved draft and final RAP.</p>
<b>Compensation</b>	<p>All compensation of assets at full replacement cost and assistance should be provided prior to displacement including provision of additional support.</p> <p>Compensation for losses at full replacement cost and transitional support will be provided prior to handing over the site for civil works.</p> <p>Para 18 Appendix 2 of ADB safeguards states that the developer will pay adequate attention to gender concerns, including specific measures addressing the need of female headed households, gender-inclusive consultations, information disclosure, and grievance mechanism to ensure that both men and women receive adequate and appropriate compensation for their lost property and resettlement assistance, if required, as well as assistance to restore and improve their incomes and living standards.</p> <p>The Social Protection Strategy requires for special consideration of gender issues because women tend to receive less assistance than men do. This is because many programs are focused on households and do</p>	<p>When displacement cannot be avoided, the client will offer displaced communities and persons compensation for loss of assets at full replacement cost and other assistance/transitional support to help them improve or restore their standards of living.</p>	<p>Compensation and other involuntary resettlement entitlements should be paid before any related physical or economic displacement takes place. Additionally, the client should take gender issues into account in determining and paying compensation and providing other entitlements.</p> <p>Under circumstances in which national law and tenure systems do not recognise the rights of women to hold or exchange property, the client shall, to the extent feasible, make provisions for women to gain security of tenure.</p> <p>Additionally, ESS 2 requires the client to improve, or at least restore, the livelihoods of all persons displaced by the project.</p>	<p>Landowners/ leaseholders are entitled to have the right to compensation in full including for assets impacted. However, there is no requirement for assets to be compensated at full replacement cost.</p>	<p>Compensation for assets will be provided at full replacement cost and transitional support will be provided to all PAPs based on their entitlements (Ref Chapter 10).</p>

ELEMENT	ADB's SPS SR 2, ADB's GENDER & DEVELOPMENT POLICY, 1998 ADB ACCESS TO INFORMATION POLICY, 2018	IFC PS5	AIIB ESS2	UZBEKISTAN LEGISLATION	MEASURES TO BRIDGE THE GAP
	<p>not consider intrahousehold differences. In the context of the proposed Project, it will be important to ensure that the proposed approaches do not disadvantage the women including those who are engaged in project related activities.</p> <p>The Gender and Development Policy requires ADB to facilitate gender analysis of proposed projects, including program and sector loans, and ensure that gender issues are considered at all appropriate stages of the project cycle, including identification, preparation, appraisal, implementation, and evaluation.</p>				
<b>Monitoring of RAP implementation</b>	<p>ADB requires monitoring &amp; assessment of outcomes, their impacts on the standards of living of displaced persons, and whether the objectives of the resettlement plan have been achieved by taking into account the baseline conditions &amp; the results of resettlement monitoring.</p> <p>In addition, the Gender and Development Policy requires for monitoring and evaluation processes to systematically incorporate attention to gender in all activities.</p> <p>As part of this, the following reports will be prepared for the Project:</p> <p>RAP Compensation Completion Report – Upon completion of compensation payments.</p> <p>Semi-annual social monitoring report - until the RAP implementation is completed.</p> <p>RAP evaluation report upon completion of the RAP implementation.</p>	<p>The client will establish procedures to monitor and evaluate the implementation of a RAP and take corrective actions as necessary.</p>	<p>Requires the client to use suitably qualified and experienced experts, monitor and assess resettlement outcomes under the project, their impacts on the standards of living of displaced persons and whether the objectives of the RAP have been achieved by taking into account the baseline conditions and the results of resettlement monitoring.</p> <p>ESS 2 also requires the verification of the implementation of the RAP through submission to and approval by the Bank of a RAP completion report upon completion of all required activities.</p> <p>It also requires the disclosure of monitoring reports and the completion report in accordance with the requirements under ESS1 sections 19 and 22.</p>	<p>No provision for monitoring is provided in the Uzbekistan law.</p>	<p>The client will establish procedures to monitor and evaluate the implementation of the approved draft and final RAP.</p> <p>A RAP Compensation Completion Report will be prepared upon completion of the compensation report.</p> <p>Final RAP mid-term review and completion audit will also be required.</p>

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## 4 PROJECT ALTERNATIVES

### 4.1 No Project Alternative

The 'No Project' alternative is not regarded as favourable, given the project is set to deliver on economically important objectives for the expansion of the country's power generation capacity with renewable sources to meet the rising domestic demand for energy. Further, the Project would contribute to national commitments for long-term cutbacks on carbon footprint and the 2030 Energy Strategy.

### 4.2 Location Alternatives

According to ACWA Power, it is also understood that the site was selected over other sites due to the wind potential, wind campaign measurements, geological factors, existing infrastructure, and interconnection to the grid.

### 4.3 Project Layout

#### 4.3.1 Wind Farm

The siting of the Project site and WTGs was based on the following:

- The wind measurement campaign,
- Location of existing infrastructure and utilities, and
- Social Impacts which included assessment of current land users, distance to existing houses and settlements.

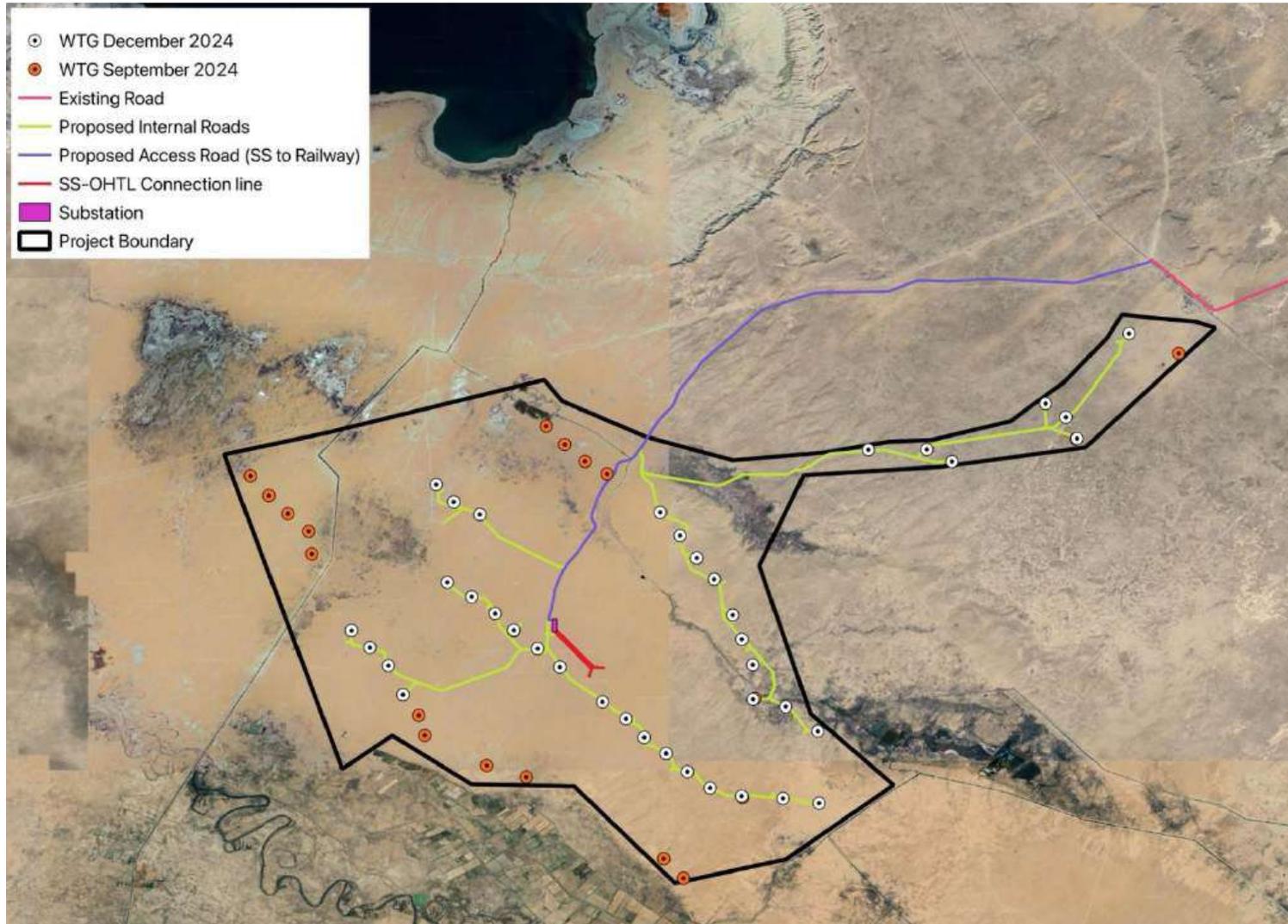
**Table 4-1 Considerations in determining the WF layout**

ELEMENT	DESCRIPTION	FIGURE
<p><b>Change in the Project boundary</b></p>	<p>The southwest of the Project boundary was adjusted so that the Project can avoid impact on agricultural land.</p>	
<p><b>Changes in the WTG locations</b></p>	<p>The original layout of the WF provided by ACWA Power in January 2024 consisted of 41 WTGs. Additional buffer WTGs were considered in case any of the WTGs needed to be replaced due to environmental, social and/or technical constraints.</p>	

ELEMENT	DESCRIPTION	FIGURE
	<p>In July 2024, 39 out of 41 WTGs were selected after the determination of the following factors:</p> <ul style="list-style-type: none"> <li>• Avoidance of the Zirabloq Main Gas line Department for safety reasons and to prevent any further WTG micrositing requirements.</li> <li>• Micrositing of WTGs located near the water channel going through the site to mitigate against potential flooding.</li> <li>• Two WTGs were moved to adhere to the 250m HPZ.</li> <li>• Removal of buffer WTGs found in areas not covered by the avifauna surveys.</li> </ul>	<p>The figure is a satellite map from Google Earth showing the project site. A black line indicates the 'Selected Project Boundary'. Green dots represent 'WTG Locations', and pink dots represent 'Buffer WTG Locations'. Annotations include: 'Removed 2 WTGs to avoid impacts to Zirabloq Main Gas Line Department' (pointing to two pink dots), 'Not considered as these were not covered in the avifauna surveys' (pointing to a group of pink dots), 'Shifted to adhere to setback from water channel' (pointing to a green dot near a water channel), and 'Shifted to ensure adhering to 250 m HPZ' (pointing to a green dot). A legend in the top right corner defines the symbols. A scale bar for 6 km and a north arrow are also present.</p>

ELEMENT	DESCRIPTION	FIGURE
<p><b>Noise &amp; shadow flicker</b></p>	<p>In December 2024, the locations of some of the WTGs were micro-sited to avoid noise and shadow flicker impacts to some of the receptors, where possible, and to take into consideration some flood risk required setbacks. In addition, the buffer WTGs were removed from the layout (see table 4-2 below).</p>	

Based on the above considerations, the final layout of the WTGs was confirmed in December 2024, as illustrated in the figure below. The WTGs that were removed from the layout are indicated in the September 2024 layout, while the rest remained unchanged or were micro-sited, as shown in table 4-2 below.



**Figure 4-1 WTG Layout considered for the Project**

**Table 4-2 WTGs that were moved and the Justification**

WTG ID	DISTANCE MOVED (M)	JUSTIFICATION
BSH2-11	9	Shifted for hydrology and flood risk purposes
BSH2-23	3	
BSH2-25	15	
BSH2-34	41	
BSH2-16	51	
BSH2-02	25	
BSH2-01	1181	Shifted to avoid noise and shadow flicker impacts on H1
BSH2-08	Replaced	To mitigate potential impacts on the fish farm, the original WTG location was replaced with WTG BSH40.

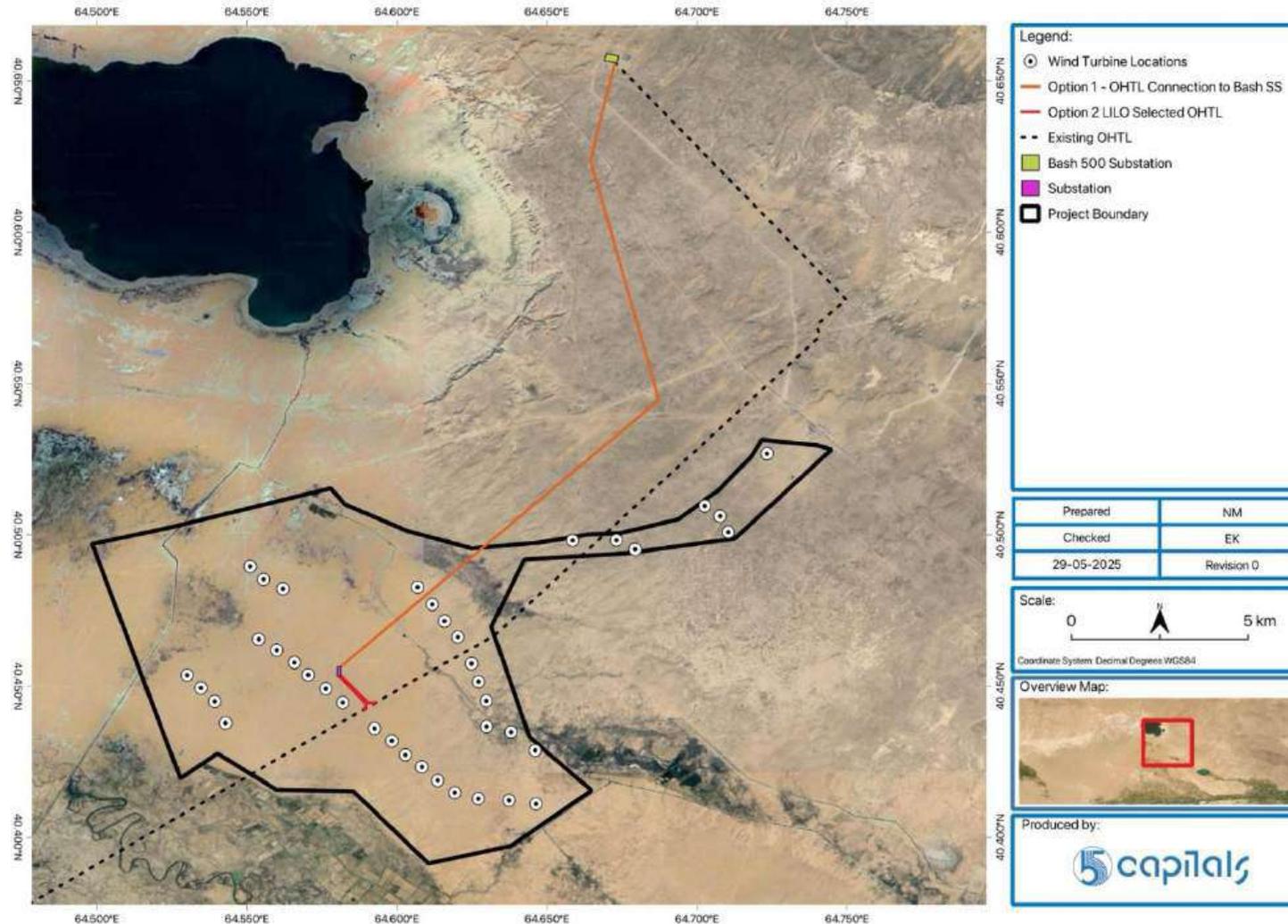
### 4.3.2 OHTL Routing

To connect the Project to the national grid, two options were considered for the routing of the OHTL:

- **Option A:** 25 km OHTL from the Project site to Bash 500 MW switching station.
- **Option B:** 1.5 km OHTL, LILO connection from the Project's substation to the Bash-Karakul OHTL.

Option B was the preferred and selected option for the following reasons:

- Technically preferred option and utilization of existing OHTL.
- Reduced environmental impacts considering a smaller footprint.
- Reduced avifauna electrocution and collisions risks due to the reduced OHTL alignment.
- Reduced impact on land used for grazing by the herders as Option B has a smaller footprint than Option A.



**Figure 4-2 OHTL Options Considered and the Selected Route show in Red**

### 4.3.3 Access Road

Two access road options were considered for the Project as shown on the following figure. these include:

- **Option 1:** Access through a dirt road connecting the site to A379 from the northeast.
- **Option 2:** Access through the farmlands in the south connecting the site to Road M37.

**Option 1** was selected for the following reasons:

- **Shorter Distance:** Option 1 covers approximately 37 km to reach A379, whereas Option 2 extends around 45 km to connect to M37.
- **Better Road Condition:** Large sections of Option 2 showed significant deterioration, including potholes and cracks, requiring extensive upgrades. In contrast, the road in Option 1, from the railway to A379, is also used for Bash 500MW. As a result, it was assessed in a traffic study and, where necessary, upgraded to accommodate construction traffic.
- **Lower Impact on Communities:** Option 1 primarily passes through open land with minimal receptors, whereas Option 2 traverses' farmlands and residential areas, increasing potential disruptions.

By selecting Option 1, the need for extensive road upgrades was minimized, reducing construction activities, associated impacts, and health and safety risks. Additionally, it avoids potential land acquisition requirements for road improvements, and therefore no additional economic or physical displacement will occur.

(see Figure 4-3 below).

### 4.3.4 Gas Pipelines

There are two pipeline corridors that have been identified in the Project area. These pipelines belong to Asian Trans Gas (ATG) and the Uztransgaz as shown in the figure below. The ATG pipeline corridor lies approximately 2.3 km north the closest WTG. On the other hand, the Uztransgaz pipeline corridor traverses the site north to south and extends around 450 m to the nearest WTG.

Following a review of the ATG pipeline's proximity to the Project access road (Option 1), consultations were held with ATG who stated that a setback of 350m would be required between the Project access road and their pipeline (see figure 4-4 below).

The requirements for Uztransgaz pipeline are discussed further below in the report

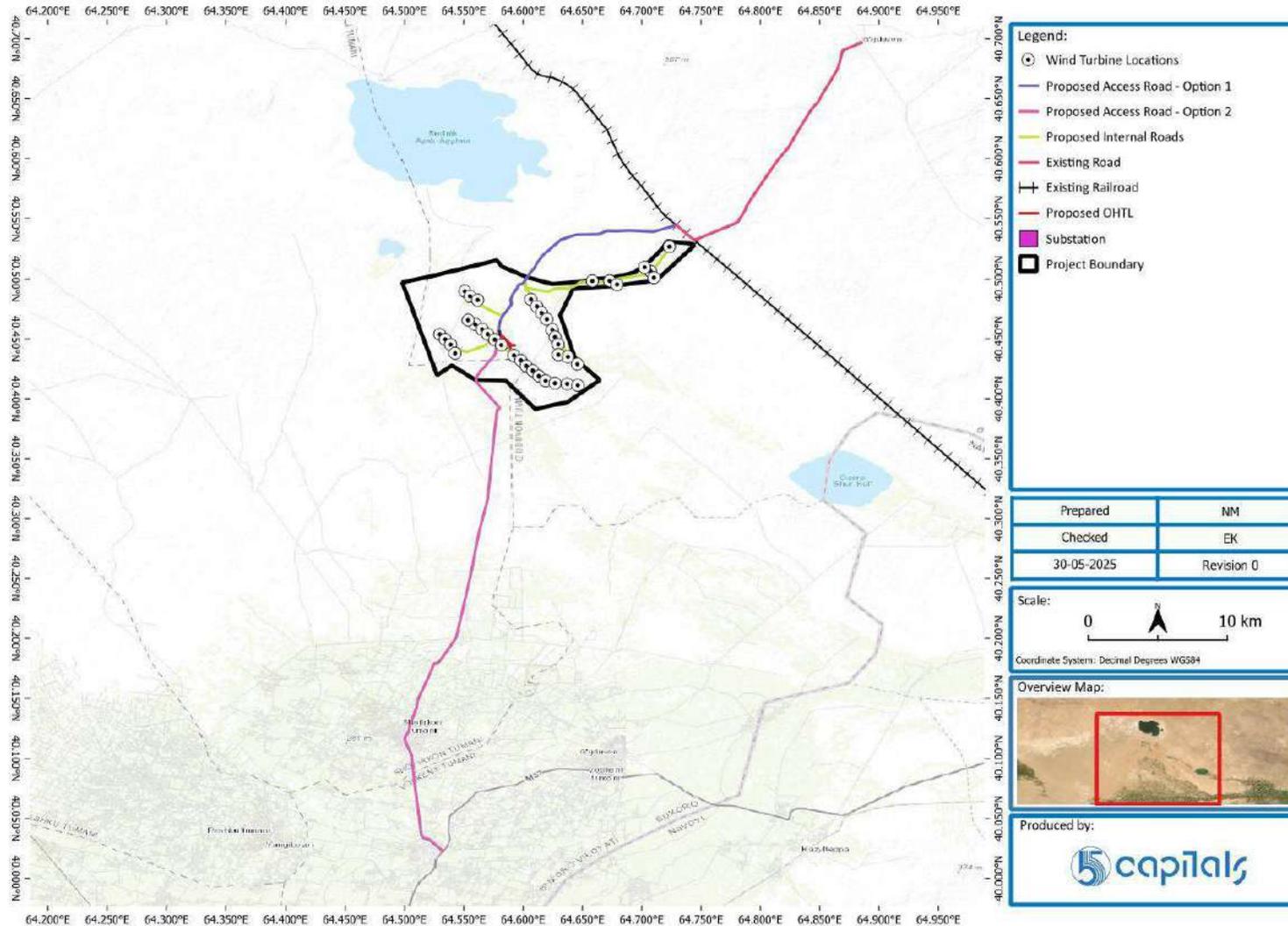
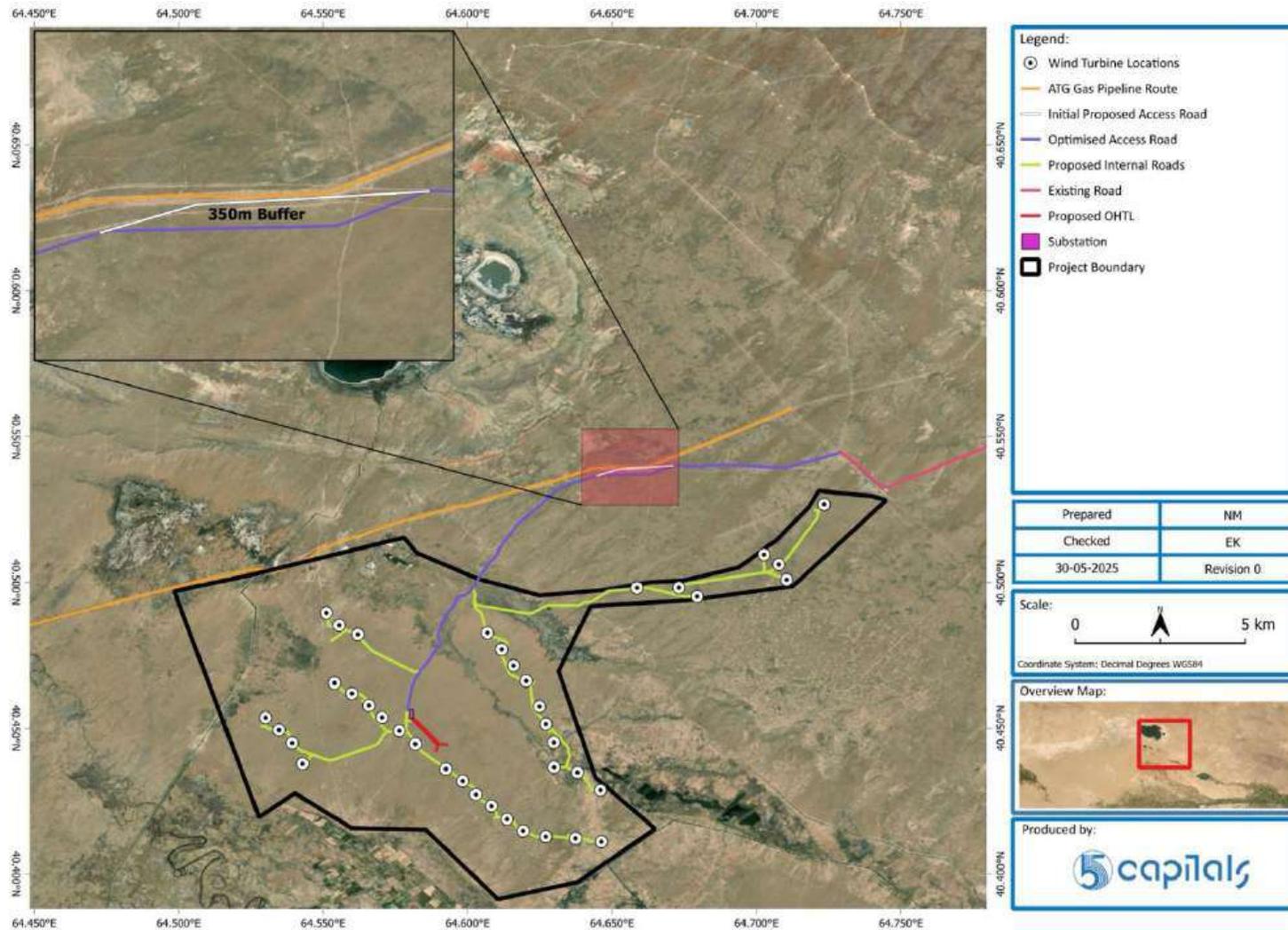


Figure 4-3 Access Road Options Considered

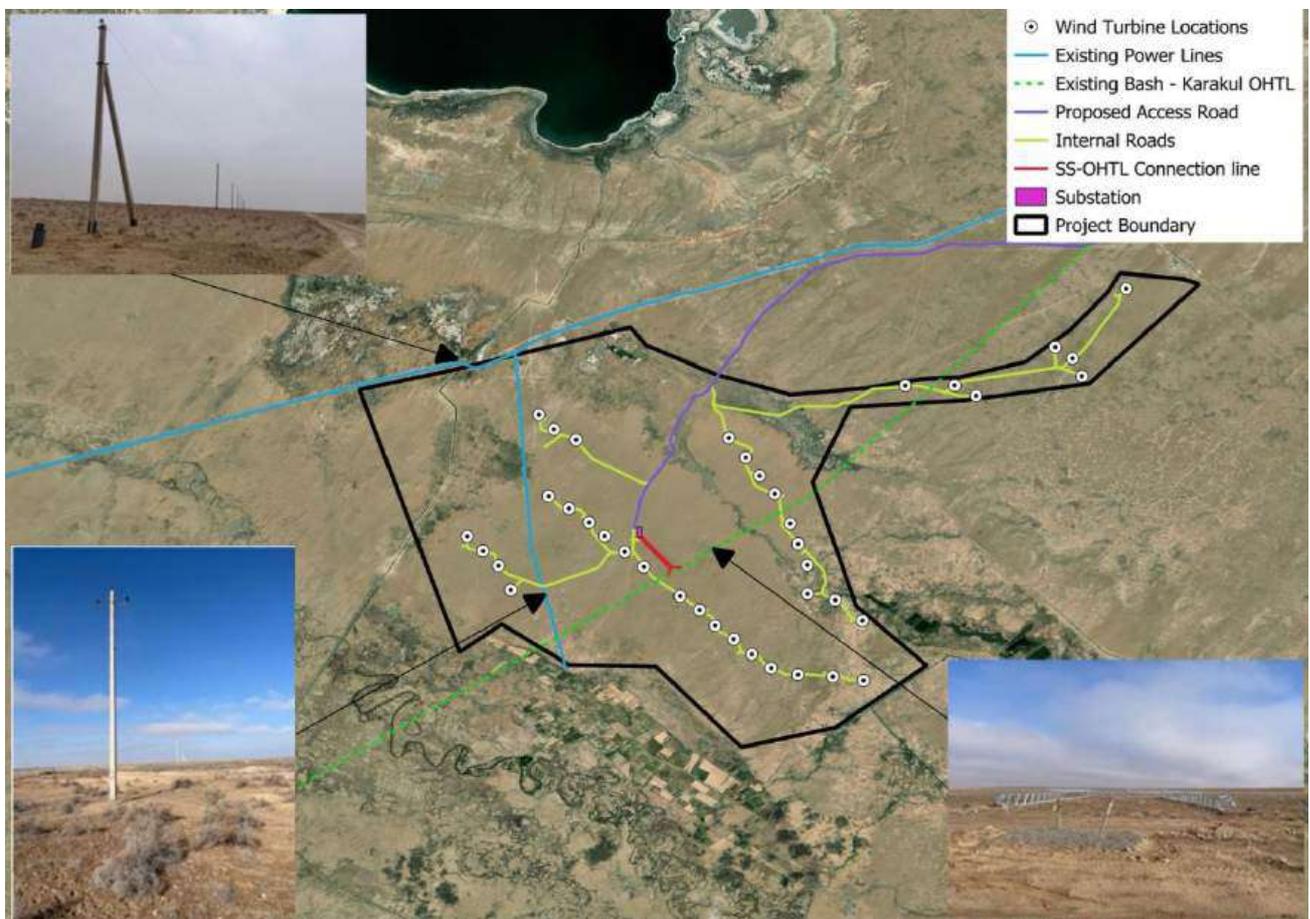


**Figure 4-4 Location of ATG gas pipeline in relation to the Project**

### 4.3.5 Existing Transmission Lines

A power line runs to the north of the Project site, about 2.3 km from the nearest WTG. Another power line crosses the site, stretching roughly 10 km from north to south and is located about 450 m from the closest WTG. Phone consultations with NEGU confirmed that these power lines fall outside their jurisdiction. As a result, a consultation letter was sent to the Bukhara Regional Electricity Grids, which confirmed that these are 35-110 kV power lines with a 15-20 m Health Protection Zone (HPZ).

Additionally, the Bash 500MW 500kV OHTL, crosses the site from east to west. As a result, the siting of the Gijduvon 300MW WF considers the HPZ requirements for these existing power lines, ensuring no impact.



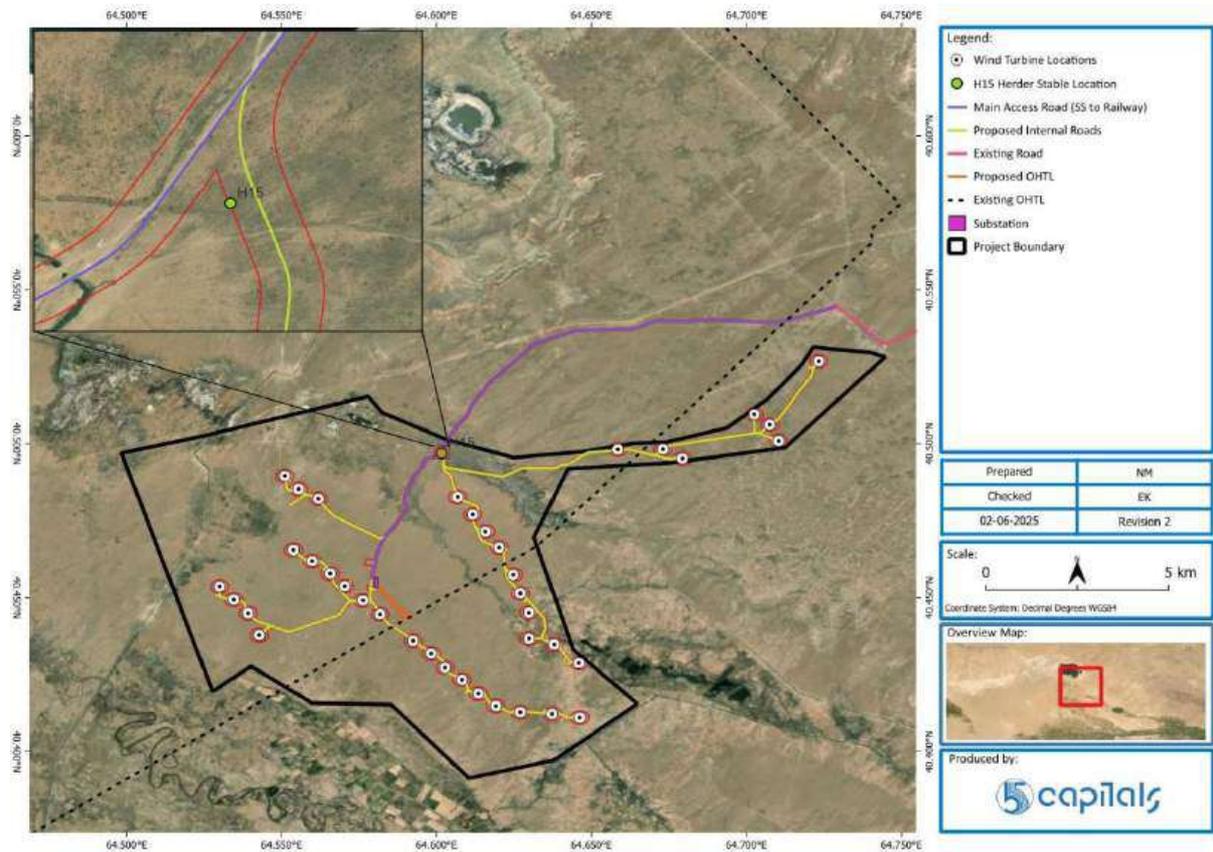
**Figure 4-5 Existing Power Lines in the Project Area**

### 4.3.6 Herders' structures

The Project's internal access roads will include a 30-m safety buffer zone to ensure the protection of herders and their livestock from construction-phase vehicle movement. Based

on this buffer requirement, it has been determined that a stable belonging to one of the herders (H15) is exactly outside the 30m buffer (32m away from the access road). Therefore, relocation of this stable will not be required.

The current location of the stable in relation to the access road is illustrated in the figure below.



**Figure 4-6 Location of H15 stable in relation to the access road**

## 4.4 Project Technology

The different turbines that were considered for the Project are presented in the table below:

**Table 4-3 Different Technologies Considered for the Project**

WIND TURBINE MODEL	MANUFACTURER
SI195-8.0	Sany
GW 182-7.5	Goldwind
EN182-8.0	Envision
MySE7.5-182	Mingyang
WD200-7.7	Windey

In consideration of the above WTG models, the Sany SI195-8.0 model was selected for the proposed Project based on the following:

- Technology options for flexible use and maximising energy generation during high and low wind conditions.
- Least Cost of Energy which results in highest generation at lowest cost.
- Site Suitability of the chosen WTG Model.
- Project Schedule.

## 5 PROJECT LAND REQUIREMENTS

### 5.1 Project Land Allocation

The Presidential Decree (PD) of the Republic of Uzbekistan on the measures for the implementation of the investment project “Construction of a 300MW wind farm, and overhead power transmission lines in Gijduvan district of Bukhara Region” was issued on 5<sup>th</sup> March 2024 allowing for the development of the proposed Project (refer to Appendix A).

The PD includes the following requirements in relation to the land allocation for the Project:

- Article 7: The administration of Bukhara region is instructed to:
  - *Select land plots in Gijduvan district of Bukhara region for the construction of a wind power plant, OHTL, and electrical infrastructure facilities with the involvement of Ministry of Energy, Ministry of Investment, Industrial and Trade, Ministry of Agriculture, and the project Company within the implementation of the Investment Project, make clarifications to the boundaries of the selected land plots, and submit corresponding proposals to the Government Commission for consideration of changes in the land categories of agricultural land and forest land.*
  - *Allocate the selected land plots on a permanent use basis to the Ministry of Energy based on the project documentation presented by the Project Company.*
  - *The Ministry of Energy is to ensure the transfer of the above-mentioned land plots to the Project Company for lease for a period equal to the duration of the Investment Project. The rental fee paid by the Project Company for the land is to be equated to the size of the land tax.*
- Article 8: Within the framework of the Investment Project states that:
  - *To exempt the Ministry of Energy from reimbursement of losses of agricultural production (compensation payments) for the use (change of category) of agricultural land.*

Based on the above, the Project Company will sign the Land Lease Agreement (LLA) with the Ministry of Energy based on the project footprint. This will be undertaken after the land use category change, which is expected to take place once the EPC Contractor is on board and has confirmed the final coordinates of the project facilities.

An easement agreement will be signed for the land required for temporary Project facilities.

#### 5.1.1 Project Land Requirements

The WF facilities including the OHTL will be located within an area measuring approximately 12,626 ha. While Project Company has been granted access to 12,626ha of the land, it is important to note that the LLA will only be based on the actual project footprint, not the entire

allocated area. Based on the Project layout, it is estimated that only 117.49ha of the total 12,626ha will be utilised by the project during the construction and operational phases, accounting for approximately 0.93% of the total allocated area. This will ensure that most of the land remains available for use by the leaseholders and land users.

**Table 5-1 Project land requirements (approximated)**

PROJECT FACILITIES	NO. OF WTG/TOTAL KM	TOTAL AREA IN HA	TYPE OF OWNERSHIP
WTG Base (including foundation & hardstand & WTG transformer)	39	24.93	Land lease for project lifetime
Sub-station including an administration building	n/a	3.46	
OHTL (10 tower locations)	1.5	0.02	
Internal access road (12m). This will also include the alignment of the underground cables.	49.3	59.02	Lease from the municipality for the project lifetime
Main access road from the railway line to the sub-station (12m)	18.64	22.34	
The temporary construction site facilities will include laydown yard, offices, other storage facilities, batching plant, accommodation camps.	n/a	7.72	Lease from the municipality
<b>Total 117.49ha</b>			

## 5.2 Land Ownership and Use

The Project site land is predominantly used for grazing activities by formal and informal herders. This land falls under the management of the entities provided in the following table.

All the land below falls under the jurisdiction of the Bukhara region, and it will be the responsibility of the Bukhara administration to make these lands available for the development of the Project, in line with the Presidential Decree discussed in Section 5.1 above.

**Table 5-2 Land ownership and use**

LANDOWNERS	LAND CATEGORY	LAND USE TYPE	REMARK
Veterinary Committee based on the Presidential Decree No. DP-15 in January 2025. This land was previously under the State Committee for Sericulture and Wool Development Industry (SWID). (see figure 5-1 below on the structure of the Committee)	Agricultural	Pastural	<ul style="list-style-type: none"> <li>This land is under the Galaba and Kokcha LLCs clusters who have lease agreements with the Veterinary Committee.</li> <li>These LLCs have annual agreements with some herders who graze their livestock within the site. These agreements include sub-leases under which the herder only grazes only their own livestock, as well as 'family contracts' where the herders' grazes both their own livestock and that of the LLC.</li> <li>Annual sub-lease agreement: Under these agreements, herders get into an annual agreement with the LLC to use their grazing land and pay an annual fee based on the number of livestock they own. The herders only graze their privately owned livestock.</li> <li>Annual <i>oilaviy pudrat shartnomasi</i> or 'family' contracts: Herders graze both their privately owned livestock and that owned by the LLCs. They make an annual land-use payment calculated based on the number of livestock they own. In addition, they receive a monthly payment from the LLC for taking care of their livestock.</li> </ul> <p>It is noted that some herders' also have both the sub-lease agreements and the 'family contracts'.</p>
Shorfikon State Forestry	Forestry Pastureland	Pastural	<ul style="list-style-type: none"> <li>No leases have been issued under this land; however, there are camp facilities belonging to Zirabuloq main gas pipeline located within this land. This camp will not be affected by the Project.</li> <li>It is noted that some herders with leases with other government entities graze on this land as there are no clear boundaries in place.</li> </ul>
Gijduvon State Forestry	Forestry Pastureland	Pastural	<ul style="list-style-type: none"> <li>There are herders who have lease agreements with the Gijduvon State Forestry, and they use the land for pastoral activities.</li> </ul>
Gijduvon Municipality	Agricultural	Pastural	<ul style="list-style-type: none"> <li>The municipalities have leased land to herders/farmers under 49-year agreements.</li> <li>Notably, although the leases of three leaseholders designate the land for farming. However, no farming activities are being carried out due to unfavourable weather conditions. Instead, the land is used for pastoral activities.</li> </ul>
Shorfikon Municipality	Agricultural	Pastural	

As per the Project's PD (Article 8), the MoE is exempt from reimbursing losses related to agricultural production<sup>13</sup>. Therefore, no compensation will be provided to the government entities listed in the table above for the land impacts. In addition, they do not have any assets within the Project area of impact.

### 5.2.1 Committee for Veterinary Medicine & Livestock Development

Most of the land within the project boundaries falls under the jurisdiction of the Committee for Veterinary Medicine & Livestock Development (herein referred to as the Veterinary Committee). The Veterinary Committee was established after the issuance of the Presidential Decree on Pastoral Land in January 2025 which abolished the Committee for the Development of Sericulture and Wool Industry (SWID). The structure of the Committee is provided in figure 5-1 below.

Based on their mandate under the Presidential Decree, the Committee is required to fulfil the following role:

- Regulatory oversight and the determination of pastures use requirements.
- Provision of policy guidance.
- Leasing of pastoral land and provision of subsidy support.

It is noted that before the abolishment of SWID, the land within the project boundaries was leased under the Kokcha LLC and Galaba LLCs for 49 years. However, consultations in October and December 2025 revealed that both entities had entered into new lease agreements with the Veterinary Committee. Under the new conditions, the lease duration was reduced from 49 years to 10 years, and the leased land area was also decreased—from approximately 297,190 ha to 160,000 ha for Kokcha LLC, and from 151,986 ha to 75,500 ha for Galaba LLC. Additionally, these clusters are private entities and not part of the Veterinary Committee. These changes are noted to be unrelated to project implementation and are instead a result of the Presidential Decree on pastoral land.

Consultations undertaken with the veterinary Committee in November and December 2025 revealed that the boundaries of the land allocated to Kokcha LLC and Galaba LLC are still being finalised. However, both LLC also confirmed that this has not impacted their activities.

Surveys and consultations undertaken between May 2024 to November 2025 with Kokcha and Galaba LLC revealed that they have entered into annual agreements with most of the herders utilising the land within the project boundaries as provided in table 5-3. The fees paid by herders under these agreements vary depending on the terms negotiated between the

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<sup>13</sup> The proposed site is not used for agricultural purposes such as farming. It is exclusively used for grazing purposes.

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respective parties. In addition, some herders are engaged in grazing livestock on behalf of the clusters, as further outlined in Section 5.2.1 below.

Organizational Structure of the Committee for Veterinary Medicine and Livestock Development

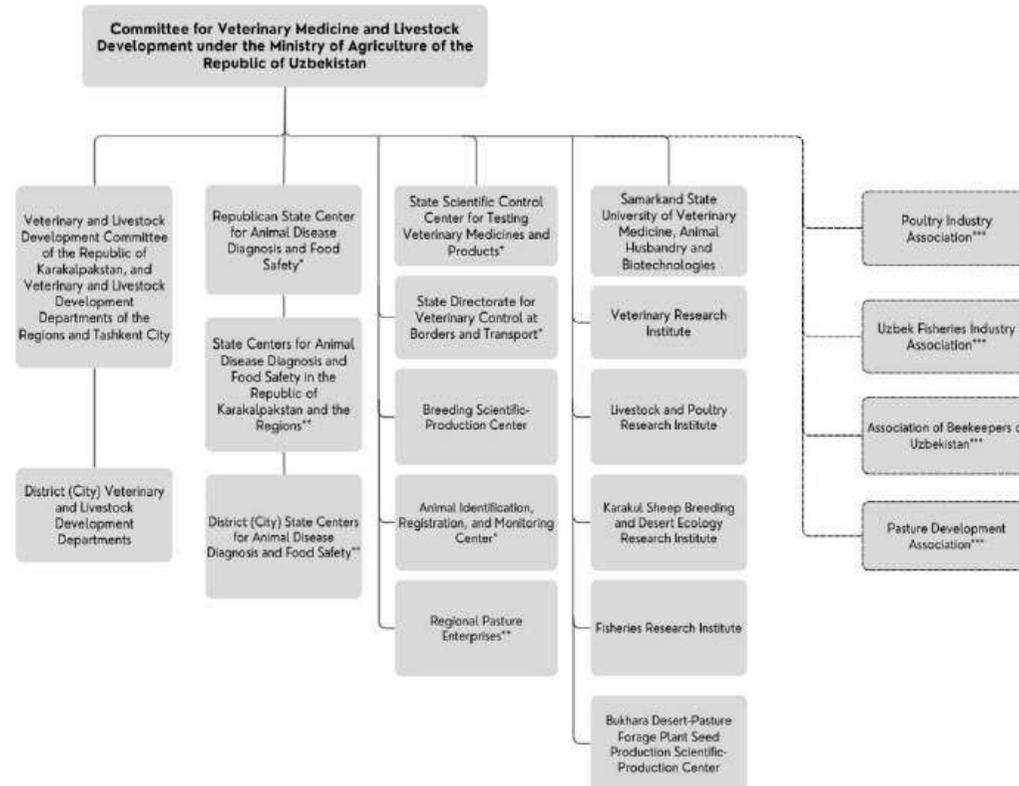


Figure 5-1 Structure of the Veterinary Committee

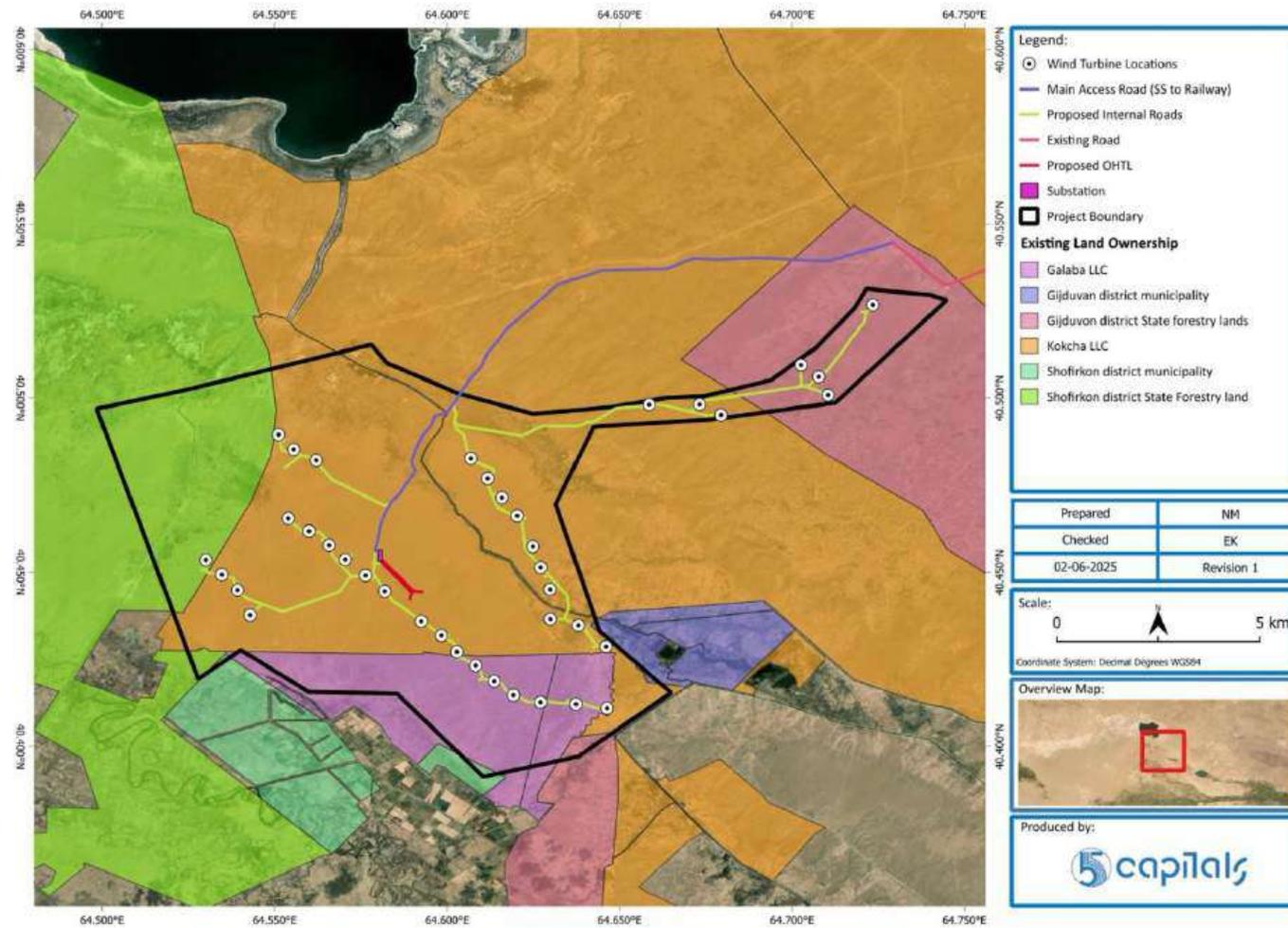


Figure 5-2 Existing land ownership on the site

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## 5.2.2 Current Land Use

### 5.2.2.1 Grazing

The current land use can be mainly characterised as pastureland. There is a total of 23<sup>14</sup> herders and 67 workers who utilize the land within the Project boundaries all year round for grazing. Their livestock typically includes sheep, goats, horses, and cattle. The livestock is mainly reared for sale; however, some also rely on it to produce milk.

Out of 67 workers, 39 workers graze their own private livestock alongside the herders' livestock, based on informal, verbal agreements. Regarding workers who have their own livestock, they use the project site only for grazing purposes and herd their livestock alongside their employers'. Out of the 39 workers who graze their own livestock, one (H16W2) left to work abroad but consultations with his employer (H16) revealed that his livestock is still grazing on the site (see Section 5.2.3 for more details).

According to information provided by the herders, the busy seasons on their grazing calendar includes the lambing season which occurs between February and April and the sheering season in April and September. During this period, some of the herders are supported by some of their family members.

Some of the herders' own structures are within the Project boundaries which include herders' houses, stables, wells, toilets, canopies, wickets and storage sheds among other structures that support their herding activities. Workers typically use the structures that belong to the herders, as they do not own any structures themselves. The structures are typically used all year round though all herders and workers reported that they own primary homes outside of the Project boundaries where their families live. It is noted that none of the structures within the site have been formally registered with the cadastral department and they are therefore considered informal.

Consultations undertaken with the herders and their workers during the socio-economic surveys conducted May and November 2024, including with the Kokcha and Galaba LLCs also confirmed that there are no nomadic herders who use the site.

### 5.2.2.2 Fish Farming

Out of the 23 herders, one herder (H10) uses the Project site for both herding and fish farming activities. He owns a fishpond which is located along the water canal running through the site and draining into Lake Akaygitma. In addition, there is another fishpond owner (F1) who also

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<sup>14</sup> One of the 23 herders is also a farmer (coded as FR1). However, the land he uses for farming is located outside the project boundaries. The land within the project area is used solely for grazing. Although his code is listed as "Farmer (F)," he is also counted among the herders. This brings the total number of herders to 23.

has a fishpond along the canal approximately 2.6 km from the nearest turbine and uses the land for grazing purposes. While F1 is within the Project boundaries, none of his grazing land or fishpond area will be impacted by the Project footprint (see figure 5-2).

According to information received from the fishpond owners, the fishing season runs from mid-March to early April and continues until September or early October each year. The harvest season is between November and February, and pond-cleaning typically occurs in December.

### **5.2.2.3 Farming**

There are three PAPs who were identified to hold long term leases of 49 years on land classified as agricultural land. These farmers include FR1, FR2, and FR3. However, the land found within the Project boundaries is used for grazing purposes as it is considered unfavourable for farming activities. Out of these three 'farmers', FR2 and FR3 land will not be impacted by the Project as no Project facilities are located within the land allocated to them.

However, FR1 owns livestock that is grazed by H23, and approximately 0.65ha of their grazing land will be temporarily impacted by the establishment of the construction safety zone. Additionally, after the lambing season, the ewes belonging to H23 (and FR1) are taken to H12 to graze (for only one month in July), while H12 gives his lambs to H23 to graze outside of the Project boundaries on the land leased by FR1. This separation of ewes and lambs occurs once a year in July and is aimed at weaning the lambs.

Consultations with H23 indicate that the anticipated impact on H12's land is not expected to disrupt their activities in July, particularly during the separation of ewes and lambs, as H23 has access to FR1's additional land located outside the Project boundaries.

The following table and figure provide a summary of the land users within the proposed Project boundaries. Details about the land size and the temporary and/or permanent area of impact are provided in table 9-5 of this RAP.

**Table 5-3 Summary of land use**

No	PAP CODE	No. OF WORKERS	LAND USE	PROJECT COMPONENTS	PERIOD OF USE	TYPE OF LAND USE	LLA DURATION	NAME OF LANDOWNER/LESSOR	COMMENT
1	H1	5	Grazing	WTGs & access road	Year round	Formal	Annual lease agreement	Gijduvon Forestry Department	<ul style="list-style-type: none"> <li>These two herders graze their livestock within the same area though they each hold a land use agreement.</li> </ul>
2	H2	3	Grazing		Year round	Formal	Annual lease agreement Annual sub-lease agreement with Kokcha	Gijduvon Forestry Department Kokcha LLC	
3	H3	6	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement & Annual family contract	Kokcha LLC	<ul style="list-style-type: none"> <li>Shares the same grazing land with H24 but they each hold a separate lease agreement with Kokcha LLC.</li> <li>H3 grazes his private livestock and that of Kokcha LLC as well.</li> </ul>
4	H4	4	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	n/a
5	H5	6	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement (renewal on-going)	Kokcha LLC	n/a
6	H6	4	Grazing	WTGs & access road OHTL	Year round	Formal	Annual sub-lease agreement	Kokcha LLC Galaba LLC	<ul style="list-style-type: none"> <li>This herder has leased approximately another 3200 ha of grazing land from Galaba LLC approximately 40km from the Project site. However, this land does not have any structures.</li> </ul>
7	H7	1	Grazing	WTGs & access road Substation OHTL & temporary laydown areas	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	n/a
8	H8	8	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>This herder is supported by two family members during the lambing season (February-April) and sheering season (April &amp; September).</li> </ul>
9	H9	2	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement (renewal on-going)	Kokcha LLC	<ul style="list-style-type: none"> <li>Shares the same grazing area with H10 as they are siblings but they each have their own lease agreement.</li> </ul>
10	H10	3	Grazing/Fish farming in a pond	WTGs & access road	Year round	Grazing land- formal Fishpond- informal	Annual sub-lease agreement for grazing land (renewal on-going)  Annual family contract'	Kocha LLC for grazing land	<ul style="list-style-type: none"> <li>H10 grazes his own livestock and that belonging to Kokcha LLC.</li> <li>Shares the same grazing land as H9 but they each have a lease agreement.</li> <li>In addition, this herder has a verbal agreement with H15 allowing H15 to graze on his land.</li> <li>The herder has no permit for the fishpond along the canal</li> <li>This herder was also affected by Bash 500MW site</li> </ul>
11	H11	2	Grazing	No facilities Project	He uses the site all year round or seasonally (spring, summer and autumn) depending on the weather.	Formal	Annual sub-lease agreement	Halol Go'sht LLC	<ul style="list-style-type: none"> <li>He is the father to H9 and H10 and was recorded as H10's worker under Bash 500MW WF.</li> <li>There will be no direct impact on his grazing land based on the Project footprint.</li> </ul>
12	H12	3	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>He grazes the ewes belonging to H23(and FR1) once a year in July on the land within the site.</li> </ul>

No	PAP CODE	No. OF WORKERS	LAND USE	PROJECT COMPONENTS	PERIOD OF USE	TYPE OF LAND USE	LLA DURATION	NAME OF LANDOWNER/LESSOR	COMMENT
13	H13	4	Grazing	WTGs & access road	He uses the site all year round or seasonally (spring, summer and autumn) depending on the weather.	Formal	Annual family contract	Kokcha LLC	<ul style="list-style-type: none"> <li>H13 grazes his own livestock and that belonging to Kokcha LLC.</li> <li>Shares the same land as H9 and H10 but they each have separate lease agreements. They share the grazing land they lease as part of pasture management and also because there are no physical boundaries that demarcate the individual leased areas.</li> <li>He was also affected by Bash 500MW as a herder. He stated he still had access to some of the grazing land outside of the construction areas.</li> </ul>
14	H14	3	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement (renewal on-going)	Galaba LLC	<ul style="list-style-type: none"> <li>The lease is under his son who is recorded as a worker (H14W1).</li> <li>The son has signed a voluntary land donation consent letter to his father. This was signed on 27<sup>th</sup> May 2025.</li> </ul>
15	H15	4	Grazing	WTGs & access road	He uses the site all year round or seasonally (spring, summer and autumn) depending on the weather.	Informal	n/a	n/a	<ul style="list-style-type: none"> <li>He uses the same land as H10 through a verbal agreement.</li> <li>However, this herder holds a lease with Kokcha LLC for land located outside of the Project site north of Agitma but he does not use it. He intends to make another agreement with Kokcha LLC.</li> <li>He was affected by Bash 500MW as a herder.</li> <li>His son supports him during the breeding season.</li> </ul>
16	H16	2	Grazing	No Project facilities but the 250m WTG safety construction zone will impact this land.	Year round	Informal	n/a	n/a	<ul style="list-style-type: none"> <li>He has a verbal agreement to use the land leased by H17 (his brother).</li> </ul>
17	H17	2	Grazing	No Project facilities but the 250m WTG safety construction zone will impact this land.	Year round	Formal	49 years	Shofirkon Municipality District	<ul style="list-style-type: none"> <li>The land was previously leased to his father on 27/04/2004. However, after the death of his father in 2008, the municipality recognised H17 as the lease holder.</li> <li>He uses the land together with H16 and provided a signed confirmation letter on 3<sup>rd</sup> April 2025 stating he allows his brother to use the same land.</li> <li>His spouse sometimes visits during the breeding and shearing seasons to support with the work.</li> </ul>
18	H18	0	Grazing	No Project facilities	Year round	Formal	Verbal annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>He has a verbal agreement with Kokcha LLC</li> <li>There will be no direct impact on his grazing land based on the Project footprint.</li> </ul>
19	H19	2	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>His family members support him during the breeding and shearing season.</li> </ul>
20	H20	1	Grazing	Access road	He uses the site all year round or seasonally (spring, summer and autumn) depending on the weather.	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>The herder has a movable trailer which is not located within the Project boundaries.</li> </ul>
21	H21	1	Grazing	Access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	

No	PAP CODE	No. OF WORKERS	LAND USE	PROJECT COMPONENTS	PERIOD OF USE	TYPE OF LAND USE	LLA DURATION	NAME OF LANDOWNER/LESSOR	COMMENT
22	H22	0	Grazing	Access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>H21 and H22 share the same grazing areas but hold separate lease agreements.</li> </ul>
23	H23	3	Grazing	No Project facilities (within FR1 land) but the 250m WTG safety construction zone will impact this land.	Year round	Informal	n/a	n/a	<ul style="list-style-type: none"> <li>Grazes his and FR1 livestock on FR1 land.</li> <li>Additionally, he grazes the lambs belonging to H12 (and FR1) once a year in July on the land belonging to FR1.</li> </ul>
24	H24	0	Grazing	WTGs & access road	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>He shares the same land with H3 but they each hold a lease agreement with KoKcha LLC.</li> </ul>
25	F1	2	Grazing/Fish farming in a pond	No Project facilities	Year round	Formal	Annual sub-lease agreement	Kokcha LLC	<ul style="list-style-type: none"> <li>While F1 is found within the Project boundaries his land and fishpond will not be affected by the Project footprint.</li> </ul>
26	FR1	1 (H23)	Grazing	No Project facilities but the 250m WTG safety construction zone will impact this land.	Year round	Formal – since 2021	49 years	Gjduvon municipality district	<ul style="list-style-type: none"> <li>Majority of the land leased to FR1 is outside of the Project boundaries.</li> <li>His livestock is grazed by H23.</li> </ul>
27	FR2	0	Grazing	No Project facilities	Year round	Formal-since 2008	49 years	Shofirkon municipality district	<ul style="list-style-type: none"> <li>While some of the land is located within the Project boundaries, none will be affected by the Project footprint.</li> </ul>
28	FR3	3	Grazing	No Project facilities	Year round	Formal	49 years	Shofirkon municipality district	<ul style="list-style-type: none"> <li>While FR3 has a formal lease with Shofirkon district, he also uses some land under Veterinary Committee informally. None of this land will be affected by the Project footprint.</li> </ul>

**LEGEND**

	Indicated land that is affected by the Project footprint.
	Indicates non-impacted land outside of the Project footprint.

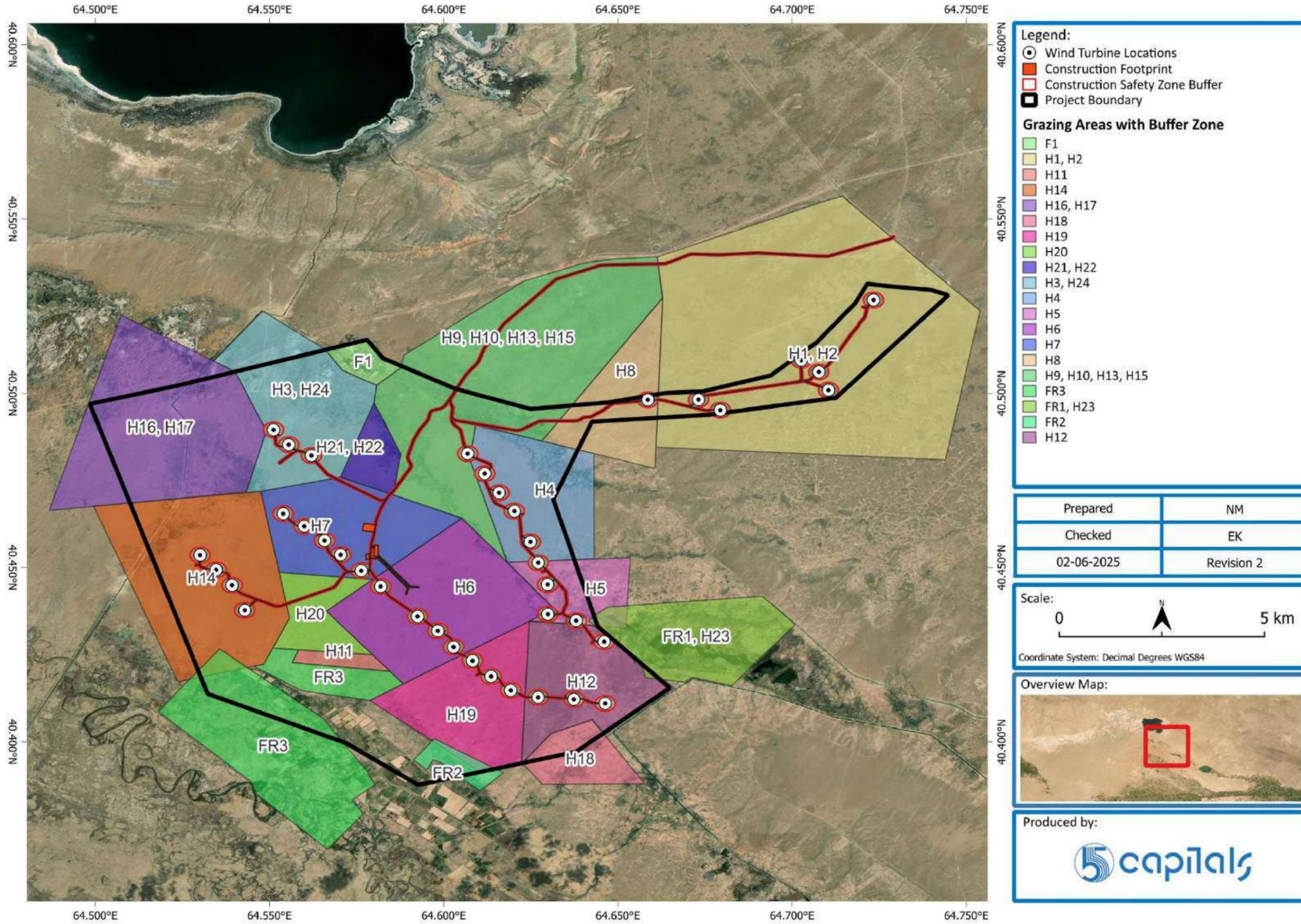


Figure 5-3 Land Use on site

As stated in Section 5.1 and shown in Figure 5-2, the Project land will be allocated based on the Project footprint and not the location of the overall site boundaries. Based on this provision, there will be no impact on the grazing land under H11, H18, F1, FR2 and FR3 as no Project facilities are in this area. Additionally, their workers will also not be affected. As such, they have been scoped out of this assessment.

### 5.2.3 Herders who Share Grazing Land & Structures

There are no physical boundaries marking grazing areas within the Project site. Instead, herders rely on verbal agreements to delineate the areas they use, which are generally located near their herding and accommodation structures. As outlined in Table 5-3, a total of 12 herders have such arrangements. These include:

- H1 and H2: Each holds a land use agreement.
- H3 and H24: Each holds a land use agreement.
- H9, H10, and H13: Each holds a land use agreement.
  - These herders also have a verbal agreement with H15 to graze within the area.
- H16 and H17: These siblings have a verbal agreement, with H17 holding the formal land use agreement.
- H21 and H22: Each holds a land use agreement.

In addition to grazing land, 9 herders and their hired workers also share grazing structures. These arrangements include:

- H24 uses structures owned by H3 and signed a consent letter on 22 May 2025 confirming he has no claim to these structures.
- H9 shares his structures with H13 and H15.
  - Both H13 and H15 signed consent letters on 21 May 2025 stating they do not claim ownership of the structures under H9.
- H21 shares his structures with H22, who signed a consent letter on 22 May 2025 confirming he has no claim to the assets under H21.
- H10 and H11 share structures that are owned by H10. Although they are related, both parties signed a consent letter confirming that H11 has no claim to the assets owned by H10.

**Note:** None of these structures will be displaced as assessed in chapter 9 of this report.

### 5.2.4 Changes in workers status after the cut-off date

Surveys for the Project were conducted in July 2024, followed by continued engagement with the PAPs. Based on this ongoing engagement, the following updates have been recorded:

- Worker H16W2 resigned from his job and took up work as a migrant worker in March 2025. His employer, H16, reported that H16W2 left 70 sheep in his care.

- Although attempts to contact the worker have been unsuccessful, he is currently considered a PAP in this report until his status is clarified.
- A worker previously employed by H6 resigned in March 2025 and was subsequently hired by H19. This worker is now identified as H19W2 in this report.
- One of H5's workers, H5W1, passed away in August 2024 due to a health condition (not related to the Project).
- H8W1 resigned from his position in August 2024.

In addition to the above, 3 herders have hired new workers since the cut-off date, including:

- H5 hired a new worker in July 2024, referred to as H5W7 in this report.
- H13 hired one worker in March 2025, identified as H13W4.
- H23 hired two workers, H23W1 and H23W2 in March 2025, who will support herding activities for 8 to 9 months each year.
  - Additionally, his son (coded H23W3) is also now engaged in herding activities, but they share the same household.

The impacts on the other herders and their workers are assessed in chapter 9 below.

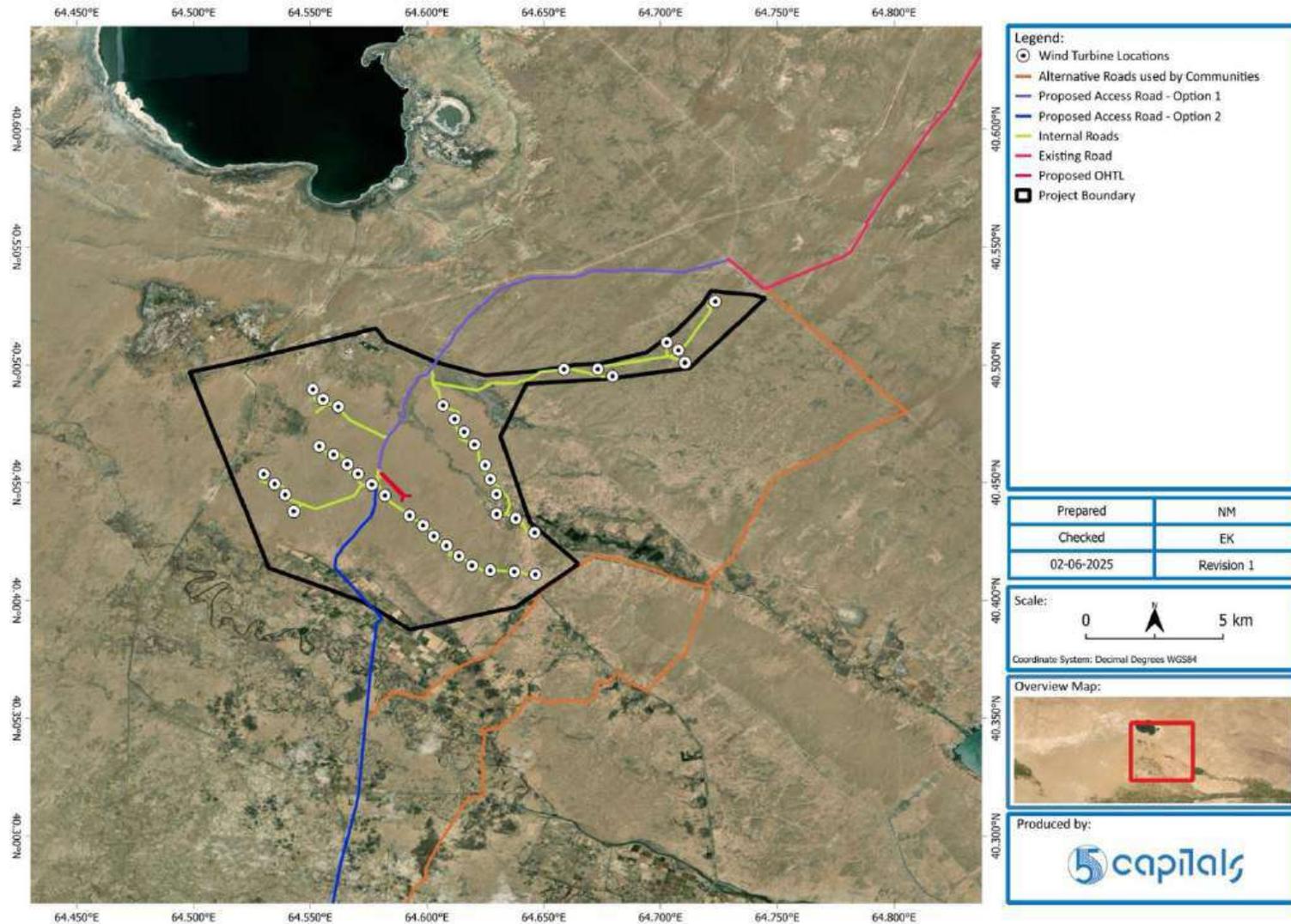
### 5.3 Local Access Road

As discussed in section 4.3.3 above, the Project site will connect through a dirt road connecting the site to A379 from the northeast. This access road is used by herders and their workers to access their grazing areas while the residents of Koklam village use the road to access Shofirkon district. There are also unpaved tracks across the site which the herders use to access their grazing areas and structures.

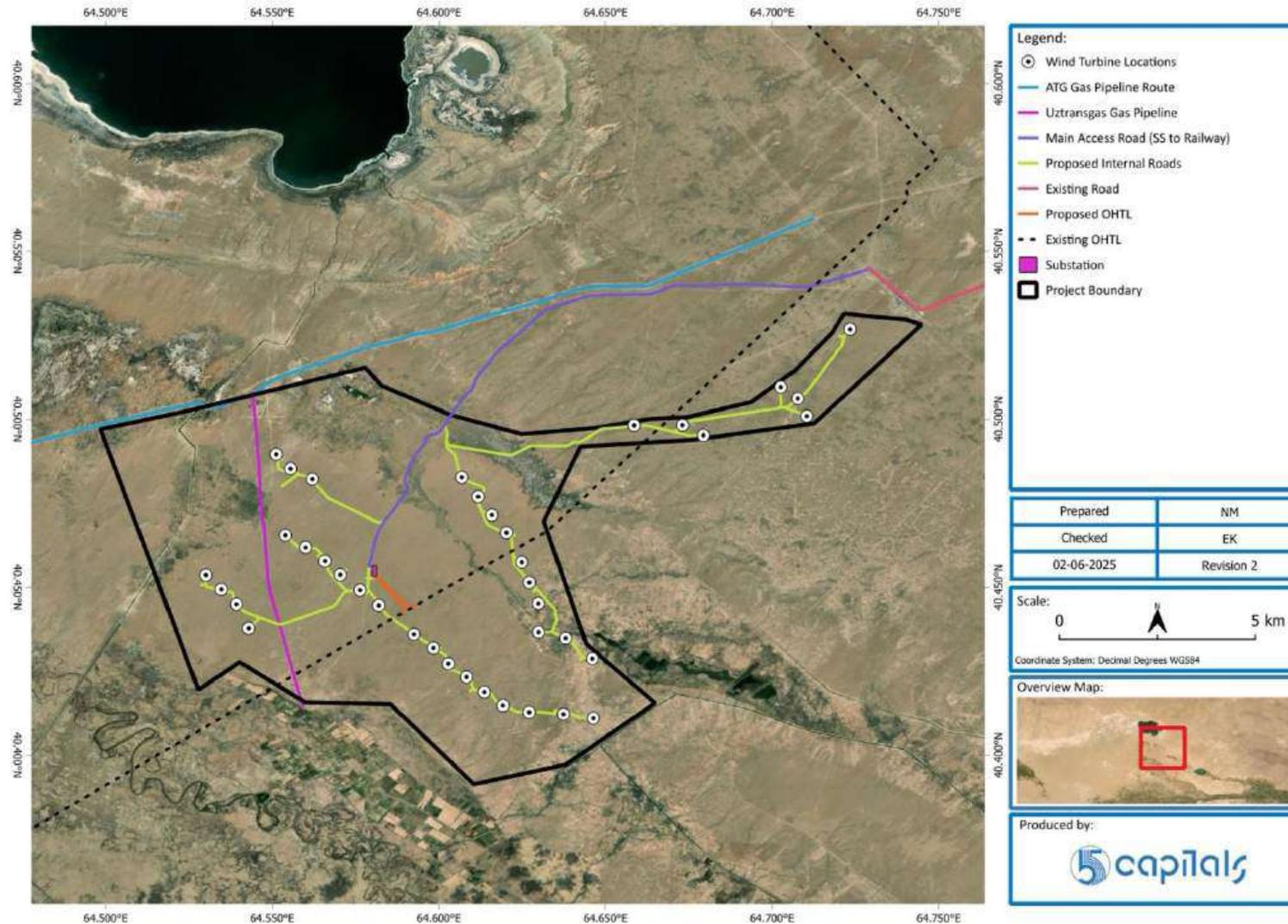
The location of the access road is shown in figure 5-3 below.

### 5.4 Gas Pipeline

The Uztransgaz pipeline corridor traverses the site north to south and extends around 450 m to the nearest WTG (BSH2-40). Additionally, there is an internal access road that crosses the pipeline. Based on this, several consultations were undertaken with Uztransgaz to determine the requirements for the Project. These consultations were undertaken via official letter correspondence in April and September 2024. In the letter, it was stated that the gas pipeline has a protection zone of 150m, and it is forbidden to undertake any work within this area without permission. As such, technical guidance will require to be obtained for the Project before the access road can be constructed, or heavy vehicles used. The location of the pipeline is shown in figure 5-4 below.



**Figure 5-4 Access roads used by local communities**



**Figure 5-5 Location of the Uztransgaz pipeline in relation to the Project facilities**

## 6 STAKEHOLDER CONSULTATIONS

### 6.1 General Overview

This section provides a summary narrative on stakeholder engagement in relation to the draft RAP preparation. Further information on stakeholder engagement integrating into the project ESIA, and the forward, overall plan for stakeholder engagement (i.e., post completion of ESIA and final RAP) are provided in the project SEP.

### 6.2 Consultations as Part of the RAP

A systematic approach was used to identify the PAPs and those who may have interest in the Project. The key stakeholders identified for the Project include:

**Table 6-1 Stakeholder Engaged During the Draft RAP**

STAKEHOLDER GROUP	STAKEHOLDER BODIES	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
<b>Project Affected Persons</b>	Herders	<b>A:</b> Formal (leaseholders) and informal land users who will experience economic and/or physical displacement because of the Project development.
	Farmers	
	Fishpond farmer	
	Workers	
	Women (female members of the affected households)	
<b>Directly Affected Organisations</b>	State Committee for Veterinary and Livestock Development <sup>15</sup> , Bukhara Pasture Management Department, including Kokcha and Galaba LLC.	<b>D:</b> Veterinary Committee manages the pastoral land that will be affected by the Project while Kokcha and Galaba LLC are leasing the land.
	Bukhara State Forestry Department	<b>D:</b> They have land within the Project boundaries.
	Shofirkon State Forestry Department	
	Shofirkon District Khokimiyat	
	Gijduvon District Khokimiyat	<b>D:</b> They have some facilities located within the Project boundaries. In addition, they will provide information
Zirabulok Main Gas Pipeline Administration		

<sup>15</sup> The previous stakeholder responsible was Sericulture and Wool Industry Development Committee (SWID) Bukhara Regional Department until its abolishment and transfer of responsibilities under UP No. 15 dated January 30, 2025 "On measures to introduce modern mechanisms for the protection and rational use of pastures".

STAKEHOLDER GROUP	STAKEHOLDER BODIES	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
		on existing gas pipelines within the project area and the required buffers.
Government Agencies/Institutions	Ministry of Energy	<b>D:</b> The Project will sign a lease agreement with the Project Company for the development of the Project.
	Ministry of Investment, Industrial and Trade	<b>D:</b> Important in ensuring that the investment of the Project is successful in line with the Presidential Decree issued for the Project.
	Ministry of Agriculture	<b>D:</b> Important in ensuring that the investment of the Project is successful in line with the Presidential Decree issued for the Project.
	Ministry of Ecology, Environmental Protection and Climate Change of the Republic of Uzbekistan (MEEPCC)	<b>D:</b> May potentially have additional requirements for the Project impacts on the forestry land within the Project Aol.
	NEGU	<b>D:</b> They will also operate the OHTL during its operation. Additionally, the 500kV OHTL will LILO to the Bash 500MW 500kV OHTL which will also be operated by NEGU.
	Bukhara Region Administration	<b>D:</b> The Presidential Decree requires them to provide land to the Ministry of Energy for the development of the proposed Project.
	Bukhara Region Cadastral Agency	<b>D:</b> Provide the Project with the official land boundaries and list of owners/users at the affected land plots.
	Cadastral departments in Gijduvon & Shofirkon.	
	AmuBukhara Irrigation Department of the Republic of Uzbekistan	<b>D:</b> There is a water canal within the Project site and this stakeholder will provide information about the water use and requirements for the Project.
	Agency on Sanitary Epidemiological Wellbeing under the Ministry of Health	<b>D:</b> To provide conclusions on the applicable health protection zone for the Project site & OHTL.
Uzbek Association of Fish Industry of the Republic Uzbekistan	<b>D:</b> Provision of information on fish farming along the canal running through the site.	
Infrastructure operators	Bukhara Regional Electricity Grids	<b>D:</b> They have existing power lines going through the Project boundaries.
	Ustransgaz	<b>D:</b> Provision of general information on planned and existing gas pipelines within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply

STAKEHOLDER GROUP	STAKEHOLDER BODIES	RELEVANCE TO PROJECT: AFFECTED (A), INTEREST-BASED (I), OR DECISION MAKER (D)
		infrastructure (e.g., appropriate buffer zones).
	Asia Trans Gaz	<b>I:</b> Provision of information on existing gas pipelines within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply infrastructure.
	Hududgaz	<b>I</b> Provision of district-level information on existing gas pipelines within the project-affected areas, and execution of laws and regulations pertaining to the operation and maintenance of gas supply infrastructure.
Other Projects in the Project Area	Bash 500MW WF (FE ACWA Power Bash Wind LLC)	<b>I:</b> These Project is found north of the proposed site and the proposed Project will connect to the grid through the Bash 500MW OHTL.
Financial Institutions	ADB	<b>D:</b> This lender will approve the RAP and monitor its implementation to ensure it is aligned with their requirements.

### 6.3 Summary of Consultations

The following table provides a summary of consultations conducted as part of the RAP. These consultations were carried out through letter correspondence, official telephone discussions, and meetings.

**Table 6-2 Summary of stakeholder consultations undertaken to date**

STAKEHOLDER GROUP	MEETING DETAILS	AGENDA	OUTCOME OF CONSULTATIONS
<b>Government institutions, and agencies</b>	SWID (now Veterinary Committee) Date: 29.02.2024	A request was sent to SWID to provide details of the Project existing leases and land use	SWID stated that a part of the project falls within Shofirkon and Gijduvon Districts and the land is under Kokcha LLC. In total, they stated there are 8 herders with contracts while 13 others had sub-leases with the Kokcha LLC cluster.
	Bukhara Region Agriculture Department Date: 29.02.2024	A letter was sent to request data on private land users and existing ownership of land parcels by legal and institutional entities within the Project boundary.	The Department shared data the name of the land user (SWID now Veterinary Committee), the details of the LLA and contact details. They added that the National Land Report of the Chamber of Cadastre could provide additional information on the Project land if needed.
	Department "Bukhvilyerloyiha" of the State Scientific and Design Institute Date: 19.02.2024	A letter was sent to gather data on land users within the project boundary, LLA, and land use activities.	Their responses stated that the land belongs to SWID (now Veterinary Committee) in Gijduvon District for pastoral activities. There is one landowner with an LLA.
	Bukhara Territorial Electricity Company JSC Date: 17.02.2024	A letter was sent to seek confirmation on coordinates of identified existing low voltage OHTL within the Project area, information on the sanitary protection zone and confirm whether there are other OHTLs within the Project area.	The response stated that there are 35-110kV powerlines within the Project boundary and there is a requirement to have a 15-20m HPZ.
	Uzbektelecom JSC Date: 19.02.2024	A letter was sent to investigate the presence of cables and communication lines within the planned project site.	The response received stated that there are no cables and communication facilities belonging to Uzbektelecom JSC.
	Zirabulok Main Gas Pipeline Administration Date: 29.03.2024	A letter was sent to investigate the existence of gas pipelines crossing the Project area or within 500 m distance.	A response was received stating that Gazli-Chiriken" main gas pipeline and pipeline networks pass through Bukhara and Navoi regions. Relevant technical condition from 'Uztransgaz' JSC will be required if the Project road will cross the gas pipeline.
	Uzsuvtaminot JSC Date: 09.04.2024	A letter was sent to investigate the existence of water bodies within the	The Department shared information on wastewater treatment facilities in Bukhara and Karakul Districts.

STAKEHOLDER GROUP	MEETING DETAILS	AGENDA	OUTCOME OF CONSULTATIONS
		Project area, 500 m radius and along the planned OHTL.	
	Bukhara Regional Department of Forestry Agency of Republic of Uzbekistan Date: 19.02.2024	A letter was sent to request data the Department's land ownership in the Project area, the presence of subcontractors, cadastral division of land users, LLA, and existing ownership of land parcels by legal and institutional entities	The Department shared data on land owned and an estimate on the cost of potential damage to the existing forest in the Project area.
	Cadastral Department of Bukhara Region Date: 19.02.2024	A letter was sent to request data on private land users within the project boundary, LLA, land use activity, and existing ownership of land parcels by legal and institutional entities	The Department shared data on land users (Shofirkon District State Forest Agency, and Silk and Wool Industry Development Committee). According to the information provided, the land is not subject to leasing, and they did not have any information on any infrastructure within the site boundaries.
	Investment, Industrial and Trade Department of the Bukhara Region Date: 19.02.2024	A letter was sent to request data on passports of Gijduvon and Shofirkon Districts, land-use planning in the Project facilities' land, existing ownership of land parcels by legal and institutional entities and the existence of informal land users.	No response was received even after following up.
	Attendees: Representative from Zirabuloq Main Gas Pipeline & JURU social team Date: 16 <sup>th</sup> July 2024	Discussions on structures under Zirabuloq Main Gas pipeline and the requirements for the Project.	<ul style="list-style-type: none"> <li>• According to the representative a gas pipe with a diameter of 01220 mm has a dangerous area that extends 350 meters on both sides from the pipeline axis, and for a gas pipeline with a diameter of 0325 mm, the dangerous area extends 150 meters on both sides from the pipeline axis.</li> <li>• If the Project vehicles will go over pipeline, technical conditions must be obtained from Uztransgas before the delivery of materials can commence.</li> </ul>
	SWID Bukhara Regional Department & JURU social team	Telephone consultation to discuss the abolishment of SWID and the transfer	<ul style="list-style-type: none"> <li>• The functions of the SWID Committee are being transferred to the Veterinary Committee within one or two months, while pasture lands will be transferred to the</li> </ul>

STAKEHOLDER GROUP	MEETING DETAILS	AGENDA	OUTCOME OF CONSULTATIONS
	Date: 17.03.25 Time: 10:00-10:30	of their responsibilities in accordance with the PD issued in January 2025	<p>Bukhara Pasture Management Department with permanent rights of use.</p> <ul style="list-style-type: none"> <li>The previous regional SWID Department will be named as Bukhara Pasture Management Department, and the consultations will be undertaken with them.</li> <li>More guidance will be provided on an on-going basis based on the expected decisions of the Cabinet of Ministers.</li> </ul> <p>(refer to section 3.1.8.1 for the details of this consultations).</p>
<b>Project Affected Persons</b>	Attendees: Herders and other land users of the proposed Project site Date: 19.01.24 – 20.01.24 & 15 <sup>th</sup> to 17 <sup>th</sup> May 2024	Face-to-face meetings were held during the first scoping site visit to the Project area where each herder who reportedly used the project site was consulted to inform them about the project and gather their contact details for further clarification of the land use.	Preliminary information on the land use and boundaries was collected from the herders. This led to further consultations with the representatives of the Cadastral Departments of Gijduvon and Shofirkon Districts.
	Attendees: Shofirkon representatives, JURU social team Date: 07.05.2024 Time: 12:00 – 13:00	Face-to-face consultation to obtain the list of landowners using the Project area and nearby lands, including the KMZ file.	During the consultations, it was determined that most of the land within the Project boundaries is under Kokcha LLC. It was also determined that Shorfikron municipality also has land in the area.
	Attendees: Kokcha LLC, JURU social team Date 08.05.24 Time: 11.00 – 12:00	Face-to-face consultation to obtain the list of land users who have a land lease agreement with Kokcha LLC.	<ul style="list-style-type: none"> <li>Kokcha LLC provided the list of land users who have signed agreements.</li> <li>Additionally further consultations were undertaken in December 2024 to verify the number of livestock owned by the Project affected persons (those under the LLCs and those owned privately). This is because the LLC keeps a record of the livestock as they offer veterinary services to the herders.</li> </ul>
	Galaba LLC Date 17.07.2924 Time: 11.00 – 12:30	Face to face meeting to verify the land users under the cluster.	<ul style="list-style-type: none"> <li>The cluster provided the map showing the land under their management and a list of land users. This map shows</li> </ul>

STAKEHOLDER GROUP	MEETING DETAILS	AGENDA	OUTCOME OF CONSULTATIONS
			<p>that the cluster has land found within the Project boundaries.</p> <ul style="list-style-type: none"> <li>• Additionally further consultations were undertaken in December 2024 to verify the number of livestock owned by the Project affected persons (those under the LLCs and those owned privately). This is because the LLC keeps a record of the livestock as they offer veterinary services to the herders.</li> </ul>
	<p>Shofirkon Halol Go'sht Sut Savdo LLC, JURU social team Date: 10.05.24 Time: 10:00 – 11:00</p>	<p>Face-to-face consultation to determine whether the LLC uses any other lands for agricultural purposes within the Project site or has leased its pastures within the Project boundaries to anyone.</p>	<p>It was determined that the land is used for grazing purposes.</p>
<b>Clarifications and information requests from stakeholders</b>			
<b>SWID &amp; the clusters</b>	<p>Kokcha LLC Date: 26.08.2024</p>	<p>Claim for compensation for the trees and shrubs within the project boundary.</p>	<ul style="list-style-type: none"> <li>• Kokcha sent a letter stating that compensation should be paid to them for the existing perennial shrubs and trees such as the saxaul trees which control sand migration and protect the site against soil erosion. According to Kokcha, these shrubs and trees are real estate as per Article 83 of the Civil Land Code. In addition, all their losses should be compensated.</li> <li>• A response was provided on 12th September 2024 stating based on the Presidential Decree dated 30th December 2021, compensation of shrubs and trees should only be paid to the MEEPCC, and any other payments would be against the law. In addition, surveys had shown that there are no shrubs or trees within the direct Project footprint as they are located on the edges of the project area and impact will be avoided.</li> </ul>
	<p>SWID 28<sup>th</sup> October 2024</p>	<p>Request for the project to provide information about the areas that will</p>	<ul style="list-style-type: none"> <li>• The information requested was provided including the location of wells owned by Galaba and Kokcha LLCs. Additionally, SWID was informed that the design provided</li> </ul>

STAKEHOLDER GROUP	MEETING DETAILS	AGENDA	OUTCOME OF CONSULTATIONS
		be temporarily and permanently impacted by the project.	would potentially be updated and this would be disclosed to the PAPs and the applicable compensations provided based on impact.
	Galaba LLC 17 <sup>th</sup> July 2024	Request for compensation for the withdraw of land for purposes of developing the Project.	<ul style="list-style-type: none"> <li>In a letter, the cluster stated that they should receive compensation for the withdrawal of their land in accordance with Article 86 of the Land Code. The cluster claimed that damages should be paid to them.</li> <li>According to the Presidential Decree for the Project, the Ministry of Energy will be allocated the land which will be leased to the Project. The PD also states that the MoE will be exempt from reimbursement of losses of agricultural production (compensation payment for the use of agricultural land).</li> </ul> <p><b>Note:</b> A meeting was held on 9<sup>th</sup> October with Kokcha and Galaba LLCs to address their claims for compensation. See section below for the outcome.</p>

### 6.3.1 Summary of Meeting with Kokcha and Galaba LLC

<b>DATE OF CONSULTATION</b>	9 <sup>th</sup> October 2024
<b>TIME</b>	11:50 – 13:30
<b>VENUE</b>	Kokcha LLC office
<b>LANGUAGE</b>	Uzbek
<b>NUMBER OF PARTICIPANTS</b>	7
<b>TARGET GROUP</b>	Kokcha LLC and Galaba LLC including a lawyer under the LLC
<b>PROJECT REPRESENTATIVES</b>	BD Executive Manager at ACWA Power 3 Representatives from Juru
<b>MATERIALS USED</b>	Project layout & information

#### Main Outcomes

- In relation to the claim for compensation for the shrubs and trees, the LLCs were informed that any compensations would be in accordance with the Presidential Decree dated 30th December 2021 which states that compensation should be paid to MEPCC. However, if the clusters claim ownership, they would be required to provide the proof of registration as per the PD-464<sup>16</sup>. Additionally, the Project is exempt from paying agricultural losses as per the PD – 116 dated 03.05.2024. The Project will avoid damage to any trees and where this is unavoidable, compensation would be paid based on the requirements of the law.
- The LLCs were also informed by ACWA Power that the land allocated to the Project will be based on the Project footprint but not the entire land within the boundaries of the site. The land allocated will be approximately 150ha.
- It was also clarified that the compensation would be provided to the actual land users and those with assets within the site. As such, the clusters cannot receive compensation on behalf of those who own the assets or are experiencing the impact on their livelihoods.
- The clusters asked for details about how the herders' assets were determined. They were informed that the JURU social team had undertaken surveys and inventory based on a cut-off date of 17<sup>th</sup> July 2024. During the surveys, the LLCs had sent a representative. Additionally, none of the herders' assets have been registered as required by law and therefore verification of ownership is on-going.
- The Kokcha LLC stated that they would lose profits based on the land allocated to the Project. However, they were informed that details from the Cadastral Dept. showed that they have approximately 250,000ha available for use. As such, the impact would not significantly affect their activities as the land allocated to the Project will be based on the footprint and not the boundary.
- They were also informed that the compensation packages will be disclosed and the methodologies explained. However, it was also agreed that the ownership of some of the wells needed to be resolved.

<sup>16</sup> Decree of the Cabinet of Ministers of the Republic of Uzbekistan on further improvement of the procedure of planting, maintenance, and use of trees and shrubs not included in the State Forest Fund.

### 6.3.2 PAPs Compensation Entitlements

A meeting was convened on 31st January 2025 following a request from the Bukhara SWID department on 15th January. The request from SWID stated that, unlike the Bash 500MW WF project, herders using the proposed Gijduvon WF should not receive benefits such as compensation and replacement land, as they are not landowners. Instead, compensation should be directed to Kokcha LLC, or if herders are compensated, they should not be assisted in obtaining alternative land. Additionally, it was stated that there was an ongoing dispute over the ownership of certain wells between the LLC and some herders.

To address these concerns, a meeting was held, and the key outcomes are summarised below.

<b>DATE OF CONSULTATION</b>	31 <sup>st</sup> January 2025
<b>TIME</b>	16:00 – 18:00
<b>VENUE</b>	Online Meeting
<b>LANGUAGE</b>	Uzbek
<b>NUMBER OF PARTICIPANTS</b>	7
<b>TARGET GROUP</b>	Kokcha LLC SWID Bukhara Dept. 2 herders who are brothers and are claiming ownership of a well outside of the Project boundaries (H10 & H9)
<b>PROJECT REPRESENTATIVES</b>	BD Executive Manager at ACWA Power 3 Representatives from Juru

#### Main Outcomes

##### Compensation requirements

- SWID & Kokcha were informed that the compensation would be paid to the owners of the assets including those built without registration. Kokcha would also be compensated if they have assets that will be impacted by the Project. The herders with structures on the site also received verbal permission to build their structures.
- Additionally, it was made clear that the Project is going to be financed by DFIs who require the livelihoods of those affected to be restored. Additionally, compensation for Bash 500MW was based on the impact assessment and in line with the Uzbek and DFIs who financed the project.
- The representative from ACWA also stated that the land would be allocated to the Ministry of Energy and not ACWA Power/Project Company. The construction will be undertaken in designated areas.

##### Ownership of wells

H9/H10 claim ownership of one well located outside the Project boundaries. According to them, if they are relocated from the site (where they have structures), they would not be able to use the well even if it is unimpacted. However, Kokcha also claimed the same well.

- H9 stated that he had been using the site since 2016 alongside another herder. In 2022, he purchased the well and other structures from this herder; however, he does not have documentation to prove ownership. He also mentioned that he had undertaken restoration work to bring the well back into working condition and Kokcha LLC did not incur any expenses.
- The ACWA Power representative stated that H9 and Kokcha LLC should reach an agreement, or each party will require to provide proof of ownership. However, the Project

will seek to not damage any of the wells so that they can be used later by the herders. Transition support such as supplying water can be provided during the construction period.

- Kokcha LLC stated that they only enter into yearly agreements with the herders. Consequently, if a lease is not renewed, any immovable assets, such as wells, remain under Kocha's use.
- The ACWA Power representative stated that the proposed solution would be for replacement land to be provided to H9 and ACWA Power would construct a well there. Both Kokcha and LLC agreed to this suggestion.

It is also noted that there is a second well located inside the Project boundaries, and it is claimed by H8. H8 informed the Project social team before the meeting that he had reached an agreement with Kokcha LLC, and they will issue an official letter stating that compensation should be provided to him. As such, H8 did not attend this meeting as he was satisfied with the agreement made with Kokcha LLC. The letter was issued on 18<sup>th</sup> February 2025.

Note: The Project impact assessment shows that none of these wells will be impacted by the Project footprint and that the herders can keep using them during the construction and operation phase without disruption.

## 6.4 1<sup>st</sup> Disclosure of the draft RAP

### 6.4.1 Schedule of Meetings

The table below provides a summary of the outcome of the disclosure and consultation activities related to the Project impacts, entitlements and the draft RAP. To minimize disruption to the daily activities of herders and workers, the disclosure sessions were conducted at the Project site. The disclosure occurred in October 2025.

As part of the disclosure process, a Guide to Land Acquisition and Compensation (GLAC) was shared in Uzbek to all PAPs.

Additionally, the project documents have been disclosed on the following websites:

- ACWA Power: <https://acwapower.com/en/what-we-do/projects/gijduvan-wind-ipp/>
- ADB: <https://www.adb.org/projects/59324-001/main>
- AIIB: [https://www.aiib.org/en/projects/details/2025/\\_download/Uzbekistan/P001027/Gijduvon-300MW-WF\\_RAP.pdf](https://www.aiib.org/en/projects/details/2025/_download/Uzbekistan/P001027/Gijduvon-300MW-WF_RAP.pdf)

**Table 6-3 Disclosure of the GLAC & Entitlements**

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
<p><b>Significantly affected and vulnerable PAPs</b></p>	<ul style="list-style-type: none"> <li>• 3 herders</li> <li>• 6 workers</li> <li>• Lenders: ADB and AIB</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• ESIA Consultants</li> </ul>	<p>21 October 2025 10:40–12:00</p>	<p>Location: At the herding compound of H5</p> <p>Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.</p>	<ul style="list-style-type: none"> <li>• Clarification was sought on how wells would be treated in the event of relocation. The Project confirmed that all assets were inventoried in the presence of PAPs and that compensation will be provided either through cash compensation or support for drilling replacement wells at relocation sites.</li> <li>• Stakeholders requested clarification on how construction activities would be phased, including when works would commence, how long they would last, and how the overall construction programme would be implemented. It was explained that construction sequencing, timelines, and work fronts are assessed within the ESIA framework and will be further defined during detailed construction planning.</li> <li>• Questions were raised regarding the location and use of access roads during construction and how movements would be managed within the project area. It was clarified that access routes and construction traffic are considered within the ESIA and that access management measures are included to minimise disturbance.</li> <li>• Stakeholders sought confirmation on how existing wells and associated infrastructure would be considered in the context of potential project impacts. It was explained that all assets and infrastructure are identified during the impact assessment process and that potential impacts are avoided or mitigated through project design and management measures defined in the ESIA.</li> <li>• Requests were made for clear and advance information on construction plans, including access routes and work sequencing, to allow affected parties to better understand the timing and location of activities. This need for early and clear communication was acknowledged and will be reflected in the final ESIA and subsequent construction planning documentation.</li> <li>• Livelihood discussions confirmed that households primarily depend on sheep and goat herding, with no commercial dairy production and milk used for household consumption only. This information was noted to inform the development of appropriate livelihood restoration measures.</li> <li>• Possible livelihood support options for women were discussed, including small-scale activities such as sewing. It was noted that further consultation with women in affected households will be undertaken to confirm interest and identify suitable livelihood support measures.</li> </ul>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
				<ul style="list-style-type: none"> <li>Participants indicated that they do not currently hold bank accounts due to lack of previous need. This was noted for consideration when designing compensation payment arrangements to ensure accessibility and practicality for PAPs.</li> </ul>
<b>Other affected PAPs</b>	<ul style="list-style-type: none"> <li>5 herders</li> <li>8 workers</li> <li>Lenders: ADB and AIIB</li> <li>Lenders' E&amp;S Advisors</li> <li>Project Developer</li> <li>ESIA Consultants</li> </ul>	21 October 2025 15:00–16:00	Location: At the herding compound of H10  Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	<ul style="list-style-type: none"> <li>A concern was raised regarding loss of income from a fishpond that had dried up prior to project construction, with the H10 seeking clarification on whether the Project would compensate for these losses. It was clarified that the reduction in water levels and loss of fish occurred before project impacts and were linked to reduced canal flows from upstream fishponds. It was further explained that no project-related impacts occur before compensation is paid, that the fishpond was not generating income at the time of asset valuation and cut-off date, and that the Project could not authorise well drilling due to national permitting requirements and safety buffer restrictions.</li> <li>The concern was formally noted and registered under the Project's GRM. H10 subsequently submitted a formal grievance on 10 November, which was reviewed and closed on 12 December 2025. In the interim, the PAP was formally informed that additional time was required to address the grievance and close the matter, in line with the GRM procedures.</li> <li>Livelihood discussions confirmed that households primarily depend on sheep and goat herding, with no commercial dairy production and milk used for household consumption only. This information was noted to inform the development of appropriate livelihood restoration measures.</li> <li>Possible livelihood support options for women were discussed, including small-scale activities such as sewing. It was noted that further consultation with women in affected households will be undertaken to confirm interest and identify suitable livelihood support measures.</li> </ul>
	<ul style="list-style-type: none"> <li>5 herders</li> <li>12 workers</li> <li>Lenders: ADB and AIIB</li> <li>Lenders' E&amp;S Advisors</li> <li>Project Developer</li> </ul>	21.10.2025 13:00-14:00	Location: At the herding compound of H6  Materials used: leaflet, ESIA presentation, Entitlement	<ul style="list-style-type: none"> <li>A concern was raised regarding expenses incurred by H6 who voluntarily leased land and constructed new stables and wells outside the project area in anticipation of relocation. It was clarified that no displacement or project-related impacts occur before compensation is paid, that no formal relocation notice had been issued, and that any voluntary actions taken in advance of the completion of the impact assessment are not considered project-induced. The concern was formally noted and registered under the Project's GRM. The concern was reviewed and responded to by the Project on 12 November 2025.</li> <li>PAPs requested clarity on the timing of any future relocation of pastureland, highlighting that relocation during the lambing and breeding season would not be</li> </ul>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
	<ul style="list-style-type: none"> <li>ESIA Consultants</li> </ul>		Matrix, GLAC and NTS.	<p>feasible. It was confirmed that any required relocation would be preceded by written notice at least three months in advance, and PAP feedback on preferred timing (January–February or June–July) was noted for consideration to minimise disruption to livestock activities.</p> <ul style="list-style-type: none"> <li>Questions were raised on differences between the Bash 500 MW and Bash 300 MW projects, particularly regarding relocation requirements. It was clarified that, unlike Bash 500 MW, only specific land parcels required for project components under Bash 300 MW will be temporarily or permanently acquired, with reduced turbine numbers and footprint designed to minimise impacts on herders and livelihoods.</li> <li>Concerns were expressed regarding dust, noise, and access during construction. It was explained that construction management plans will include mitigation measures for dust, noise, traffic, and road use, and that coordination with herders will continue during construction through an appointed community or social manager and the grievance mechanism.</li> <li>Clarification was sought on the process should PAPs refuse to make land available for the project. It was explained that the project is implemented under national legislation and a Presidential Decree, that compensation and livelihood support will be provided in line with national and international requirements, and that further consultations with government authorities would follow if agreement is not reached.</li> <li>Livelihood discussions confirmed that households primarily depend on sheep and goat herding, with no commercial dairy production and milk used for household consumption only. This information was noted to inform the development of appropriate livelihood restoration measures.</li> </ul>
<b>Other affected PAPs</b>	<ul style="list-style-type: none"> <li>4 herders</li> <li>8 workers</li> </ul>	22.10.2025 14:00-15:30	Location: In the Kukcha LLC building  Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	During the meeting, no questions or concerns were raised by the participants.

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
	<ul style="list-style-type: none"> <li>3 herders</li> <li>27 workers</li> </ul>	23.10.2025 14:30-16:30	Location: In the Kukcha LLC building Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	During the meeting, no questions or concerns were raised by the participants.
	<ul style="list-style-type: none"> <li>2 herders</li> <li>1 worker</li> </ul>	20.10.2025 14:30-15:30	Location: In the Kukcha LLC building Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	During the meeting, no questions or concerns were raised by the participants.
<b>Non-impacted PAPs</b>	<ul style="list-style-type: none"> <li>1 herder</li> </ul>	23.10.2025 18:00-18:30	Location: In the office of Halol Gusht Savdo LLC. Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	During the meeting, no questions or concerns were raised by the participants.
<b>Gijduvon District Municipality and their relevant departments</b>	<ul style="list-style-type: none"> <li>15 representatives of Gijduvon district municipality</li> </ul>	22 October 2025 09:00 – 12:00	Location: At the Gijduvon district municipality Materials used: leaflet, ESIA	<ul style="list-style-type: none"> <li>Municipal and Forestry representatives raised concerns regarding potential vegetation loss, land degradation, and delays in recultivation based on experience from the BASH 500 project. It was clarified that under the BASH 300 project only limited, clearly defined areas will be used, vegetation inventories will be jointly undertaken with the Forestry and Ecology authorities, and compensation and recultivation will be implemented for both temporary and permanent impacts.</li> </ul>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
	<ul style="list-style-type: none"> <li>• Lenders: ADB and AIIB</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• ESIA Consultants</li> </ul>		presentation, Entitlement Matrix, GLAC and NTS.	<p>Recultivation will be carried out in a phased manner and aligned with seasonal conditions, with repeat planting where needed to achieve full restoration.</p> <ul style="list-style-type: none"> <li>• Clarification was sought on mitigation of soil compaction, erosion, and vegetation damage from construction traffic and cable trenching. It was confirmed that construction activities will be restricted to defined buffer zones, mitigation measures are included in the ESIA, and reclamation works will be implemented to restore affected land to its original condition.</li> <li>• Questions were raised regarding the launch of the E-Yaylov (E-Pasture) platform and its role in allocating pastureland to herders. It was confirmed that the platform will be launched following completion of the national pasture inventory, with interim support from local authorities and Kokcha LLC to assist herders if relocation is required before the platform becomes operational.</li> <li>• Livelihood restoration measures were discussed, with suggestions including livestock development loans, involvement of veterinary and agricultural specialists, and support for meat and dairy processing. Additional proposals were made to support women's livelihoods through skills training and small business opportunities, which were noted for consideration within the livelihood restoration programme.</li> </ul>
<b>Shofirkon District Municipality and their relevant departments</b>	<ul style="list-style-type: none"> <li>• 23 representatives of Shofirkon district municipality</li> <li>• Lenders: ADB and AIIB</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• ESIA Consultants</li> </ul>	23 October 2025 09:00 – 12:00	Location: At the Shofirkon district municipality Materials used: leaflet, ESIA presentation, Entitlement Matrix, GLAC and NTS.	<ul style="list-style-type: none"> <li>• Clarification was sought on the status and timing of the E-Yaylov (E-Pasture) platform and its relationship with the existing E-Auction system. It was explained that the pasture leasing procedure is still under development under a Cabinet of Ministers' resolution, is expected to be finalised by the end of the year, and that the E-Yaylov platform will be integrated with the E-Auction system once operational.</li> <li>• Questions were raised on how herders would be relocated to alternative pasture lands if required before the E-Yaylov platform becomes operational. It was clarified that herders currently operate under agreements with Galaba LLC or Kokcha LLC, and that alternative pasture lands can be allocated through these LLCs, with support provided for water supply, including well construction where needed.</li> <li>• Clarification was requested on the permitting process and timelines for drilling wells on alternative pasture lands. It was explained that permits are issued following review by the Pasture Management and Hydrology authorities, with conclusions typically provided within eight working days, followed by design approval prior to construction.</li> <li>• The timing of any potential relocation of herders was discussed, with emphasis on avoiding the livestock breeding season in March–April. It was acknowledged that advance notice of at least three months is appropriate and that construction</li> </ul>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
				<p>scheduling should, where possible, avoid this period or ensure compensation if avoidance is not feasible.</p> <ul style="list-style-type: none"> <li>• Clarification was provided on the scale of relocation, confirming that only a limited number of herders may be permanently relocated but can resume using the pasture lands after construction is complete, while others will continue using existing pasture lands and receive compensation for temporary impacts only.</li> <li>• Questions were raised regarding different herder arrangements (family contracting versus land lease agreements). It was clarified that both arrangements exist, with some herders working under annual family contracts with LLCs and others leasing land directly, and that this distinction will be considered in impact assessment and compensation planning.</li> <li>• Livelihood restoration options were discussed, including proposals related to water supply improvements, solar-powered pumping, livestock services, pasture improvement, and involvement of local specialists. These suggestions were noted for consideration following completion of technical and environmental studies.</li> <li>• Employment opportunities were discussed, with confirmation that priority will be given to local candidates for both construction and operation phases, subject to required qualifications, and that vacancies will be coordinated with local authorities.</li> <li>• Compensation for damage to vegetation and environmental impacts was raised, and it was confirmed that compensation will be paid in line with national legislation, with oversight by the relevant environmental authorities.</li> </ul>

## 6.4.2 Consultations on the Establishment of the E-auction System

A telephone consultation was conducted on 3<sup>rd</sup> February 2026 with a representative of the Veterinary Committee to confirm whether the pastureland e-auction system had been established in December 2025, as envisaged under the Presidential Decree on Measures for the Implementation of a Modern Mechanism for the Protection and Rational Use of Pastures (January 2025).

Based on the information provided, it was confirmed that the e-auction system has not yet been established. The representative further stated that the Committee has completed an inventory of most pasture lands nationwide and is currently working on operationalizing the e-auction system. However, no revised timeline for its launch was provided.

It is noted that the delay in launching the e-auction system does not affect current land use by the PAPs.

## 6.4.3 2<sup>nd</sup> round Disclosure – RAP and Revised Project Layout

Following submission of the Updated RAP to the lenders in January 2026 and addressing the concerns raised during the ESIA public disclosure meetings was conducted between 20 and 23 October 2025 another round of disclosure was undertaken between 19 and 21 February 2026.

In total, nine (9) meetings were held with different stakeholder groups to ensure effective and targeted consultation. These are presented in the following table.

The purpose of all meetings was the public disclosure of the following:

- Update the stakeholders on the current project status and how key concerns during the October 2025 disclosure have been addressed in the ESIA and RAP.
- Present the revised layout based on the detailed design stage and outline the main changes, the key drivers behind them and the way forward in managing these changes to the layout.

Meetings were structured to allow open discussion, questions, and feedback from stakeholders. To support the effective disclosure to stakeholders, visual materials, including brochures translated into Uzbek were distributed to all participants, and the presentation content was delivered verbally during the meetings.

Disclosure sessions concluded with question-and-answer discussions, during which stakeholder feedback and concerns were recorded.

The summary of the outcome of the meeting is provided below

**Table 6-4 Summary of 2<sup>nd</sup> Round of Disclosure**

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
<b>Gijduvon District Municipality and their relevant departments</b>	<ul style="list-style-type: none"> <li>• 14 representatives of Gijduvon district municipality</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• ESIA and Local EIA Consultants</li> </ul>	<p>19 February 2026 10:00 – 11:45</p>	<p>Location: At the Gijduvon district municipality</p> <p>Materials used: Brochure and ESIA presentation</p>	<p>During the meeting, no questions or concerns were raised by the participants.</p>
<b>Shofirkon District Municipality and their relevant departments</b>	<ul style="list-style-type: none"> <li>• 9 representatives of Shofirkon district municipality</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• ESIA and Local EIA Consultants</li> </ul>	<p>20 February 2026 10:00 – 11:00</p>	<p>Location: At the Shofirkon district municipality</p> <p>Materials used: Brochure and ESIA presentation</p>	<p>A question was raised by the Head of the Forestry Department regarding the proposed 10-metre buffer zone around the wind turbines during the construction phase, noting that construction activities appear to require a larger working area and seeking clarification on how impacts to forestry land would be managed. It was confirmed that the reduction from 250 m to 10 m applies to the construction phase only, and that the technical team has defined these setbacks to minimise the area of disturbance. All construction activities will be confined within the confirmed buffer/easement areas, which will be clearly demarcated and barricaded to ensure safety and to allow grazing activities to continue outside these zones.</p> <p>In addition, clarification was sought regarding the party with whom the Shofirkon District Forestry Department should sign the easement agreement. It was confirmed that any damage to forestry land, whether permanent or temporary, will be compensated based on the outcomes of the inventory survey undertaken in October 2025. This survey has been conducted with the participation of ACWA, as well as representatives from the Gijduvon and Shofirkon forestry departments, and the Bukhara region Ecology department. The aim of issuing the easement agreement, totalling 92.84 hectares, is to return the land that was taken for temporary use to the municipality following the construction phase.</p> <p>Additionally, another visit by the same departments and ACWA and inventory will be carried out and compensation will be recalculated accordingly. These will be reflected in the updated ESIA and RAP and disclosure meetings for the outcomes of the assessment of the revised layout are scheduled to take place in April/May. We kindly request your participation in these meetings.</p>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
<b>Project PAPs</b>	<ul style="list-style-type: none"> <li>• 8 herders</li> <li>• 1 worker</li> </ul>	<p>19 February 2026 15:00- 16:00</p>	<p>Location: In the Kukcha LLC building Materials used: Brochure and ESIA presentation</p>	<p>A concern was raised by a herder regarding temporary containers and construction material that was left near his grazing land and the potential commencement of construction activities during the lambing season. Clarification was sought on how such activities would be managed and whether advance notice would be provided to avoid impacts on livestock.</p> <p>It was confirmed that, should these containers and construction materials interfere with grazing activities, they would be removed. The herder subsequently confirmed that the containers were not currently interfering with his activities.</p> <p>It was further confirmed again that construction activities will not commence without prior communication as highlighted in the presentation, and that a minimum three-month advance notice will be provided to affected stakeholders. This notice period is intended to minimise and avoid disruption, particularly during sensitive periods such as the lambing season.</p>
	<ul style="list-style-type: none"> <li>• 3 herders</li> <li>• 6 workers</li> </ul>	<p>21 February 2026 11:00- 11:45</p>	<p>Location: at H5 structures on site Materials used: Brochure and ESIA presentation</p>	<p>During the meeting, no questions or concerns were raised by the participants.</p>
	<ul style="list-style-type: none"> <li>• 4 herders</li> <li>• 4 workers</li> </ul>	<p>21 February 2026 13:00- 14:00</p>	<p>Location: at H9 structures on site Materials used: Brochure and ESIA presentation</p>	<p>A concern was raised by a herder regarding the potential impact of underground cable trenching on access to grazing land during construction. It was noted that, based on previous experience under the BASH 500 project, cable trenches (approximately 2.5 m wide and 1.5 m deep) can prevent livestock from crossing and may restrict access to portions of pasture until works are completed. Concern was also expressed that, although other herders have not yet raised this issue, similar impacts may arise once construction commences, particularly in relation to trenching, road construction and heavy truck traffic.</p> <p>In addition, a concern was raised regarding the movement of heavy vehicles during the construction period and the potential risks to livestock, particularly newborn lambs, including the possibility of injury or separation from the flock.</p> <p>These concerns were formally acknowledged and registered under the Project's GRM on 21.02.2024. It is currently under review by the Project team</p>

STAKEHOLDER BODIES	ATTENDEES	DATE AND TIME	VENUE AND MATERIALS USED	MAIN OUTCOME
				and will be addressed in accordance with the established GRM process and timelines.
	<ul style="list-style-type: none"> <li>• 5 herders</li> <li>• 6 workers</li> </ul>	21 February 2026 14:50-15:30	Location: at H3 structures on site Materials used: Brochure and ESIA presentation	During the meeting, no questions or concerns were raised by the participants.
	<ul style="list-style-type: none"> <li>• 1 worker</li> </ul>	21 February 2026 15:45-16:20	Location: at H17 structures on site Materials used: Brochure and ESIA presentation	During the meeting, no questions or concerns were raised by the participants.
	<ul style="list-style-type: none"> <li>• 1 herder</li> <li>• 2 workers</li> </ul>	21 February 2026 17:00-17:30	Location: at H3 structures on site Materials used: Brochure and ESIA presentation	During the meeting, no questions or concerns were raised by the participants.
<b>Residents of Kuklam Community</b>	<ul style="list-style-type: none"> <li>• 4 participants</li> <li>• Lenders' E&amp;S Advisors</li> <li>• Project Developer</li> <li>• Local EIA Consultants</li> </ul>	20 February 2026 14:00-15:00	Location: At Kuklam Village Materials used: Brochure and ESIA presentation	<p>A request was raised by a local resident regarding the condition of approximately 500 metres of road at the entrance to the neighbourhood, which was reported to require repair. Concern was also expressed regarding a damaged speed bump along the internal road, with vehicles reportedly travelling at unsafe speeds.</p> <p>The concern was formally acknowledged and registered under the Project's GRM on 21.02.2024. It is currently under review by the Project team and will be addressed in accordance with the established GRM process and timelines.</p>

## 6.5 Future Stakeholder Engagement

There are several future engagements which are planned as part of the compensation payment and construction works. These engagements are summarised in the table below.

**Table 6-5 Planned stakeholder engagement**

ACTIVITY	STAKEHOLDERS	TENTATIVE TIMELINE
Disclosure of the updated draft RAP	All PAPs categories as applicable	February 2026
Final disclosure of the RAP	All PAPs categories as applicable	March/April 2026
Explanation and disclosure of individual compensation packages.	All PAPs categories as applicable	April 2026
PAPs review of their individual compensation packages	All PAPs categories	April 2026
Negotiation & finalisation of compensation with PAPs	All PAPs categories	April 2026
Engagement with PAPs for signing of compensation agreements and payment of compensation.	All PAPs categories	April 2026
Literacy training before the payment of compensation	All PAPs categories	April 2026
Engagement with PAPs to confirm receipt of compensation packages.	All PAPs	April 2026
Engagement with PAPs to identify the suitable livelihood programs (to be led by a livestock expert)	All PAPs	February/March 2026
Notification to PAPs on the start of LNTP and construction works including notification to leave the impact areas (for those who will be physically displaced)	PAPs that will be physically displaced	March 2026

ACTIVITY	STAKEHOLDERS	TENTATIVE TIMELINE
Engagement with the PAPs to provide orientation for the selected livelihood programs	All PAPs	May 2026
Targeted engagement with vulnerable households	Vulnerable households	Ongoing during the implementation of the RAP
On-going engagement with the RAP Committee	RAP Committee	On-going
Road safety and construction safety zone awareness campaigns during the construction phase	All PAPs categories	Ongoing during the construction of the Project
Operational phase Health Protection Zone requirements	All PAPs categories	At the start of the operational phase
Raising awareness of the grievance mechanism.	All PAPs categories	Ongoing for the lifetime of the project
Ongoing regular recording, addressing of the grievance mechanism	All PAPs categories	Ongoing for the lifetime of the project

## 6.6 Grievance Redress Mechanism

Lenders require the client to establish a Project specific grievance redress mechanism with suitable grievance redress procedure to receive and facilitate resolutions of affected people's concerns, complaints and grievances. As a result, a Project level grievance mechanism has been established to allow the PAPs to submit their grievances arising from the land and other assets compensation or any other issues in relation to the Project impacts. The established grievance mechanism allows for the following:

- PAPs to submit their complaints/concerns in written or verbal form.
- 5 Capitals as well as the local consultant (Juru) to review and, within their authority be responsible for resolving submitted grievances (in co-ordination with ACWA Power).
  - The GRM will be handed over to the Project Company draft and final RAP implementation team.

The following details have been provided to the PAPs to submit their grievances, clarifications and request for information.

**Table 6-6 Grievance Mechanism Contact Details at ESIA & draft RAP**

COMPANY	CONTACT DETAILS	POSTAL ADDRESS
<b>ACWA Power (Project Developer)</b> Akbar Mavlonov Executive manager – Business Development ACWA	Email: amavlonov@acwapower.com Mob: +998 71 238 9960	Tashkent Yunusabad, Office 303, Floor 3, Block A, 88A, Amir Temur Avenue, Yunusabad district, 100084 Tashkent, Uzbekistan
<b>Juru Ltd.</b> Gulchekhira Nematullayeva – Senior Social Specialist	Email: g.nematullaeva@juru.org Mob, SMS: +998 97 445 95 04 Work: +998 71 202 04 40	A, Chust Str., Tashkent, 100077, Uzbekistan
<b>Juru Ltd.</b> Iroda Malikova – Social Specialist	Email: i.malikova@juru.org Mob, SMS: +998 77 067 55 50 Work: +998 712020440	
<b>Juru Ltd.</b> Bekhruzbek Erbaev – Social Specialist	Email: b.erbaev@juru.org Mob, SMS: +99893 600 96 91 Work: +998 71 202 04 40	
<b>Juru Ltd.</b> Karolina Sulitanofu – Environmental Specialist	Email: k.sulitanofu@juru.org Mob, SMS: +998 90 994 03 77 Work: +998 71 202 04 40	

The Project specific GRM uses an understandable and transparent process that is culturally appropriate and readily accessible at no cost; so, all affected parties will have the opportunity to raise a complaint. Under the Project specific GRM, the PAPs are allowed to seek redress/resolution mechanisms outside of the established Project GRM such as the courts.

The process flow and timeline below are being followed as part of the GRM. Where complex grievances, or other factors are extending the investigation time, the Grievant is informed of this delay and advised of an updated expected timeline for response.

**Table 6-7 Grievance Process and Timeline**

STAGE	TIMELINE
Grievance Received/Submitted	-
Grievance logged and acknowledged	Within 1 week of grievance being submitted
Grievance investigated	Within 2 weeks of grievance being submitted*
Proposed resolution conveyed to grievant	Within 2 weeks of grievance being submitted
<b>IF APPLICABLE FOLLOWING DISSATISFACTION OF RESOLUTION BY GRIEVANT</b>	
Actions to re-assess grievance/propose new solution/inform Grievant of final decision	Within 2 weeks of notification of dissatisfaction by Grievant
In the event that a grievance cannot be resolved between the two parties the RAP Committee will be involved to support the Project in finding a resolution (Refer to section 12.4 for the role and composition of the committee)	Within 2 weeks of notification of dissatisfaction by the Grievant.

**Table 6-8 Grievance Mechanism Contact Details (during construction & operation)**

COMPANY	CONTACT DETAILS
<b>ACWA Power (Project Developer)</b> Sherzod Onarkulov	Email: sonarkulov@acwapower.com Work: +998 77 238 9960 Mob, SMS: +998 90 003 99 60
Project Company Social Manager Community Liaison Officer (CLO)	Contact points TBD
EPC Contractor Contact points to be determined	Contact points TBD
O&M Company	Contact points TBD

In addition to the project-level GRM above, people who are, or may in the future be, affected by the project will have a range of forums available to them for purposes of raising their complaints, grievances, and concerns. These include channels to raise to ADB through the resident missions and the ADB project teams.

Additionally, the mechanisms below will also be available:

- ADB Accountability Mechanism.
  - <https://www.adb.org/who-we-are/accountability-mechanism#contact>.
- AIB – Project-affected People's Mechanism (PPM)
  - Submission can be made via the website below:

- <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/submission/index.html>
- Asian Infrastructure Investment Bank (AIIB)  
Tower A, Asia Financial Center, No. 1 Tianchen East Road  
Chaoyang District, Beijing, China 100101  
Email address: ppm@aiib.org  
Fax number: +86-10-8358-0003

#### **PUBLICISING THE GRIEVANCE MECHANISM**

All the PAPs identified have been fully informed of their rights to the GRM and of the procedures for lodging a grievance, addressing it whether verbally or in writing in accordance with the process described above.

Information about the availability and accessibility of the GRM will be communicated to the PAPs during on-going consultations and the implementation of the draft and final RAP.

#### **6.6.1 Submissions Received to Date**

The GRM was established in February 2024 when the stakeholder consultations commenced. Since the establishment of the GRM, 31 submissions including follow ups have been received from the PAPs. These include:

- 2 requests for additional information on when the herders who previously used the Bash 500MW site could return to the site since the construction phase was coming to an end.
- 2 were complaints about the impacts from Bash 500MW WF which included issue related to waste management and the excavation of sand pits which affected the animals.
  - The above submissions were submitted to FE ACWA Power Bash Wind LLC to be addressed, and they are closed out.
- 17 of the submissions related to the herders using the Project site requesting information about the Project regarding whether their livelihoods would be impacted and the compensation amounts they would receive, and if they could sign new contracts with the clusters or build new structures.
  - All the herders were informed to carry on with their grazing activities including renewal of their leases as planned. This is because the Project was required to provide compensation before impact.
  - Additionally, they were informed that the impact assessment was on-going, and the Project team would advise on when the disclosure of the impacts and entitlements would occur.

- 
- The PAPs who wanted to build new structures were informed these would not be compensated as these structures would be established after the cut-off date and none of them were registered with the cadastral department.
  - The herder with a fishpond submitted a request for clarification stating that 60% of his fish had died due to the hot weather. As such (and due to the cut-off date) he wanted the Project to grant him permission to by a new pump and dig a well.
    - He was informed that the Project did not have authority to allow him to dig a well as according to the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan of 14 August 2019, No. 672) drilling boreholes/wells is prohibited without permits in Uzbekistan. He would therefore need to make an application to the relevant authority.
    - It is noted that no Project activities have been undertaken and therefore the impact on the water levels in the canal cannot be attributed to the project.
  - Two PAPs submitted a grievance stating that they had experienced impact as they had stopped their livelihood relating to the use of fishponds after the cut-off date. A response was provided to these PAPs including a request to provide additional information.

Two grievances received during the disclosure of the RAP on 20<sup>th</sup> February 2026 are currently being addressed as summarised in table 6-4 under the disclosure outcomes.

## 7 CENSUS AND SOCIO-ECONOMIC SURVEY

### 7.1 Census Survey

The objectives of the draft RAP census include the following:

- To identify the types of land use within the project sites.
- To establish the number of project-affected land users within the project sites.
- To quantify potential livelihood impacts in terms of the number of PAPs. In this respect, PAP hereinafter refers to both individual and institutional (legal) entities.

The draft RAP census began with an early investigation into assets and entities that could be affected, particularly those facing livelihood impacts. The first phase involved a site visit to between 19<sup>th</sup> to 20<sup>th</sup> January 2024. This was followed by written and in-person consultations, along with cadastral reviews in collaboration with the Gijduvan and Shofirkon municipalities, as well as cadastral department of these municipalities. In addition, consultations on were undertaken with Kokcha and Galaba LLCs. The main objective was to define land parcels (cadastral boundaries) within the project areas and to gather general information regarding existing land use and ownership. These consultations were undertaken from February 2024 and continued through the data collection process.

After consultations, additional fieldwork was conducted during the draft RAP stage to verify informal land use. The final phase of the census ran alongside socioeconomic and asset inventory surveys to collect more detailed data for assessing and classifying PAPs. This was undertaken between May and November 2024.

### 7.2 Categorisation of PAPs

Based on the outcome of the surveys and consultations undertaken for the Project, the PAPs can be categorised as:

- 5 Government entities
  - Veterinary & Livestock Development Committee
  - Shorfikon State Forestry
  - Gijduvon State Forestry
  - Gijduvon Municipality
  - Shorfikon Municipality.
- 2 livestock clusters which include Kokcha & Galaba LLC.
- Uztransgaz

- 22 herders & 130 members of their families
- 1 farmer (FR1) and 5 members of his family.
- 67 workers & 348 members of their families.

### 7.2.1 Household Composition

All PAHs participated in the socio-economic surveys; however, one household (FR1) only provided partial information about his household but declined to respond to the majority of questions asked by the team.

In addition, household surveys were not conducted for the new workers hired after July 2024 - H5W7, H13W4, H23W1, H23W2, and H23W3 – but consultations were held to determine their basic information such as household composition, number of livestock and type of contracts and land use. However, the rest of their data has not been included in the socio-economic analysis below.

Additionally, socio-economic data was not collected for seasonal workers, as both the number of workers and the individuals engaged vary from season to season. Based on the information provided by the herders, approximately 118 seasonal workers were employed during the previous season. However, this number changes with demand, and the same seasonal workers are not always hired each time.

In conclusion, there are 78 PAHs. These PAHs include 483 PAPs with 226 males and 257 females. It is noted that 12 workers share the same household as the herders (the breakdown of household composition is presented in Appendix B).

**Note:** As outlined in Section 5.2.1.3, the FR1 land located within the Project boundaries is used solely for grazing purposes. However, the land is classified under the code 'Farmer (F)' to reflect the general classification of all the land under his lease.

## 7.3 Socioeconomic Survey

The objectives of the socioeconomic survey included the following:

- To gather household-specific information for profiling the pre-project (baseline) structure and socioeconomic situation of PAHs.
- To garner supplementary information on potentially impacted land and attached assets.
- To obtain information regarding household-specific preferences and priorities in terms of compensation and livelihood restoration initiatives.
- To identify PAHs that are socioeconomically vulnerable in the context of livelihood restoration planning.

The scope of the draft RAP census and socioeconomic survey analysis presented in the following sub-sections of this report was limited to the Project facilities. The Project will potentially impact 23 herders (including FR1) and 67 workers. The socio-economic studies were undertaken between 7-27<sup>th</sup> May, and 15-31<sup>st</sup> July as well as November 18, 2024. Of the 67 workers, 12 share the same households as the herders (see Appendix B for the breakdown of household composition).

**Table 7-1 Breakdown of surveyed PAPS by category**

HERDERS	FARMER	WORKERS	TOTAL NUMBER OF SURVEYED PAPS
22	1	55 <sup>17</sup>	78

## 7.4 Survey Results

**Note 1:** The impact assessment demonstrated that 5 herders (H4, H5, H7, H12, H14) and 17 of their workers (H4W1, H4W2, H4W3, H4W4, H5W2, H5W3, H5W4, H5W6, H5W7, H7W1, H12W1, H12W2, H12W3, H14W1, H14W2, H14W3) will be significantly affected by the Project. Of the 17 workers, four share the same household as the herders. These include H4 and H4W4, H5 and H5W2, H7 and H7W1, as well as H14 and H14W1, who are from the same households. This translates to a total of 18 PAHs comprising of 120 PAPS who will be significantly affected by the Project. However, since H5W7 is a new worker, only his basic household information is provided below where available.

The rest of the herders and their workers will not be significantly impacted. These include 17 herders, one farmer (FR1) and 50 workers. (refer to Chapter 9 for more details).

The data analysis below has therefore been disaggregated based on significantly affected PAHs and those who are non-significantly affected.

**Note 2:** As discussed above, socio-economic data for the newly hired workers is not included in the analysis below, as they were employed after the completion of the surveys. However, their household composition is known and presented in Section 7.2.1 and Appendix B.

### 7.4.1 Ethnicity & Religion

During the socio-economic survey, it was established that all PAHs are of Uzbek nationality. The survey did not include questions related to religion due to the sensitivity of the topic. However, it is reasonably assumed that most, if not all, respondents are Muslim, given that Islam is the predominant religion in Uzbekistan.

<sup>17</sup> This includes the 5 new workers hired by the herders (H5W7, H13W4, H23W1, H23W2, and H23W3).

### 7.4.1.1 Indigenous People

The assessment against the lenders requirements for Indigenous Peoples demonstrates that none of the four criteria are met, as shown in table below.

**Table 7-2 Indigenous peoples' evaluation of the PAPs**

ADB'S SAFEGUARD REQUIREMENT 3: INDIGENOUS PEOPLE	IFC PS 7 INDIGENOUS PEOPLE	AIIB ESS 3 INDIGENOUS PEOPLE	CHARACTERISTIC OF THE PAPs	ADB'S CRITERIA IS TRIGGERED?
Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others.	Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others.	Self-identification as members of a distinct indigenous cultural group and recognition of this identity by others.	The proposed Project is situated in the Bukhara Region, located in the southwestern part of Uzbekistan. This region has a population of approximately 2,077,000 <sup>18</sup> , the majority of whom are of Uzbek or Tajik ethnicity. It is noted that all PAPs utilizing the Project site identify as Uzbek, which is also the majority of ethnic group in Uzbekistan <sup>19</sup> .	No
Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.	Collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural resources in these habitats and territories.	Collective attachment to geographically distinct habitats, ancestral territories or areas of seasonal use or occupation in the project area and to the natural resources in these areas.	The PAPs have no attachment to the land allocated to the proposed project. This land is designated for grazing purposes by the State and is managed by the Veterinary & Livestock Development Committee, Gijduvon and Shorfikon municipality. In addition, the characteristic of the land (habitat) allocated to the project is like majority of state land designated as grazing land in	No

<sup>18</sup> [https://buxstat.uz/uz/?preview=1&option=com\\_dropfiles&format=&task=frontfile.download&catid=286&id=5502&Itemid=1000000000000](https://buxstat.uz/uz/?preview=1&option=com_dropfiles&format=&task=frontfile.download&catid=286&id=5502&Itemid=1000000000000)

<sup>19</sup> <https://www.worldatlas.com/articles/ethnic-groups-in-uzbekistan.html>

ADB'S SAFEGUARD REQUIREMENT 3: INDIGENOUS PEOPLE	IFC PS 7 INDIGENOUS PEOPLE	AIIB ESS 3 INDIGENOUS PEOPLE	CHARACTERISTIC OF THE PAPs	ADB'S CRITERIA IS TRIGGERED?
			Uzbekistan and does not have any specific cultural value. Additionally, while the herders have structures on site to support their grazing activities, their primary homes are in other areas in Bukhara where their families reside.	
Customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture.	Customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture.	Customary cultural, economic, social or political institutions that are distinct or separate from those of the dominant society or culture.	The PAPs identify as Uzbeks and are therefore part of the mainstream cultural, economic, social and political institutions. As such, the PAPs are part of the dominant society and culture.	No
A distinct language, often different from the official language of the country of region.	A distinct language or dialect, often different from the official language or languages of the country or region in which they reside.	A distinct language or dialect, often different from the official language or languages of the country or region in which they live.	The PAPs speak the Uzbek language which is considered as the official language in the Republic of Uzbekistan.	No

## 7.4.2 Age & Marital Status

The age structure of the heads of households (HH) is provided below.

**Table 7-3 Age Structure of the HH Based on Significance of Impact**

PAPs BREAKDOWN	16-29	30-39	40-49	50-59	60+
Non-significantly affected PAHs	11	15	23	10	5
Significantly Affected PAHs <sup>20</sup>	3	6	3	6	3

All the herders (including FR1) HHs are married apart from H7 who is a widower. Among the workers, 55 are married while 7 are single. None of the HH are female led.

## 7.5 Education

The right to education is a fundamental right guaranteed to all citizens of the Republic of Uzbekistan by the Constitution, which states that "every person has a right to education." The State oversees the education system and provides free education up to the secondary level. Nearly 100% of the Uzbek population has attained at least a secondary education, with both women and men having an equal literacy rate of 99.9%.<sup>21</sup>

According to the Statistics Agency, during the 2023-2024 academic year, across the Bukhara region the number of schools were counted to 583, 5 academic lyceums, 11 professional colleges, and 13 universities<sup>22</sup>.

In Project districts -Gijduvan and Shofirkon – there are 75 and 59 schools, 1 profession college in each district. There is no academic lyceums and universities.

The socio-economic survey revealed high literacy levels among PAPs, and none was recorded as illiterate. According to the data provided, kindergartens and schools are available within the communities where the PAHs live. However, there are no universities in the area—only academic lyceums and colleges, which are about 10 minutes away by car. It was reported that school-aged children typically take between 10 and 30 minutes to reach their schools. All respondents described the condition of educational institutions as good.

All significantly affected herders, and most of their workers have secondary education, and they stated that they had graduated. Only H5W2 and his spouse were recorded as being in university as undergraduates.

<sup>20</sup> Significantly affected PAPs are those who will have a loss of 10% or more of their productive assets. Refer to Chapter 9 for more details.

<sup>21</sup> UNDP "Human Development Report", 2016

<sup>22</sup> <https://buxstat.uz/uz/rasmiy-statistika/social-protection-2>

Among the non-significantly affected PAPs, all the HH have a secondary education apart from H2W2 who did not complete his secondary education. However, he can read and write.

5 HH hold higher education (FR1, H8, H9, H19W1, H5W2).

Among the spouses, all of them have secondary education level and higher apart from H5W2. Among those with higher education, these include the spouses of H2, H8, H9 and H10.

**Table 7-4 Education Level of the HHs and their Spouses**

EDUCATION STATUS	NO SIGNIFICANT AFFECTED		SIGNIFICANTLY AFFECTED	
	HEADS OF HOUSEHOLDS (NUMBER)	SPOUSES	HH	SPOUSES
Illiterate	-	-	-	-
Has not completed high school	1	1	-	-
High school/secondary	55	37	20	17
Special secondary education/technical/college	5	15	0	1
University/Higher	4	5	1	1

## 7.6 Health

As of 2023, there were 118 hospitals in Bukhara region, 3 of which are in Shofirkon district and 8 in Gijduvan district. The number of health clinics is counted 634 for the same year, with 49 in Shofirkon and 75 in Gijduvan districts<sup>23</sup>.

In general, local communities in Uzbekistan, particularly in rural areas, have access to a limited range of healthcare services. Most villages have a single clinic that provides first aid and general medical consultations. For specialized medical services, residents need to travel to district or regional medical centres.

The PAHs reported that medical facilities are accessible and located approximately 1.1 km from their communities, or about a 15-minute walk. Most families seek medical care only when necessary. For specialized treatment, some households prefer to travel to major cities such as Bukhara or Tashkent.

Of the households surveyed, 83% rated the condition of local healthcare facilities as good, 13% rated them as average, and 4% were unsure.

<sup>23</sup> <https://buxstat.uz/uz/rasmiy-statistika/social-protection-2>

In relation to their health, the socio-economic survey recorded a total 22 PAHs suffering from various health conditions such as disabilities and chronic illness. The breakdown is provided in the table below.

**Table 7-5 Health conditions of HHs & family members**

HEALTH CONDITION	NON-SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	HEADS OF HOUSEHOLDS	FAMILY MEMBERS	HH	FAMILY MEMBERS
Cardiovascular disease	-	H8W4's spouse H2W3's son	-	H4's spouse
Diabetes	H6	H6's spouse H1W4's mother	-	-
Disability	-	H23' spouse has 2 <sup>nd</sup> group disability H23's mother has 2 <sup>nd</sup> group disability H19W1's mother is blind H8W9's daughter is blind H6W5's mother has 2 <sup>nd</sup> group disability H2W3 sister has mental disability. H1's brother, brother's wife, brother's daughter and 2 sons has second group disability	H14W2 is mute	H5W5's spouse has 2 <sup>nd</sup> group disability H12's nephew is mute H12W3 spouse has 2 <sup>nd</sup> group disability H14W2' spouse is mute
Hernia <sup>24</sup>	H19W2	H10W2's spouse H9W2's mother	H12W3	H12's brother
Bone diseases/ defomation	H24 (has a condition that affects his hip) H23 (has a condition that affects his leg)	-	-	-
Cancer	H22 (stomach cancer)	H3's son has leukaemia	-	-
Gastric ulcer	H19	H19's spouse	-	-

<sup>24</sup> In Uzbekistan, some hernias are considered chronic due to the need for the patient to access regular medical care.

HEALTH CONDITION	NON-SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	HEADS OF HOUSEHOLDS	FAMILY MEMBERS	HH	FAMILY MEMBERS
<b>Total</b>	<b>6</b>	<b>19</b>	<b>2</b>	<b>6</b>

According to the information provided by the HH, they are responsible for paying for all the medical costs involved in treating the sick members of the households.

In relation to the Project site, healthcare services are located at a considerable distance due to the site's remote location. The nearest healthcare facility is approximately 45 to 100 km away from the Project site. Based on this, PAPs stated that they rely on ambulances in case of emergency situations while on site.

## 7.7 Employment

In 2023, the number of people applicable for employment consist of 858,800, and 803,2000 of them were employed. Among these employed 436,000 people were working for public sector, while 367,200 were employed in private sector<sup>25</sup>. Unemployment rate for the region was indicated by Bukhara state statistics department as 6,5%, with 6.6% for Shofirkon district and 6,3 for Gijduvan district.

During the socio-economic survey, employment data was collected for the HHs and their spouses. Most households are engaged in grazing activities, while most of the spouses are homemakers.

Among the significantly affected PAPs, all herders are exclusively engaged in grazing activities, while the 17 workers identified their primary occupation as workers/assistants to the herders that employ them. As for their spouses, most are housewives; additionally, there are two pensioners, one student, and one spouse employed as technical staff at a local school.

A similar pattern was observed among the non-significantly affected PAPs: all 17 herders are engaged in grazing activities, while the farmer identified farming as his primary occupation. Additionally, 49 workers were employed by the herders. One of the workers, H16W2, has since resigned and migrated abroad for employment, leaving his livestock in the care of H16. However, he is still counted as a PAP as his livestock is grazed within the Project boundaries.

Among the spouses of the non-significantly affected PAPs, the majority (46) are housewives, with three pensioners. Additionally, there are 2 student spouses (H2&H13W2), one seasonal worker (H16W1), and one spouse (H15W1) involved in her own business.

25 <https://buxstat.uz/uz/rasmiy-statistika/labor-market-2>

In relation to the 5 new workers - H5W7, H13W4, H23W1, H23W2, and H23W3 – it was identified that their main occupation is as herder's workers/assistants.

**Table 7-6 Type of Employment**

TYPE OF EMPLOYMENT	NON- SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	SPOUSE OF HH	HEAD OF HOUSEHOLD	SPOUSE OF HH	HEAD OF HOUSEHOLD
Farming	-	1		-
Herding	-	17		5
Herder's workers	-	49		17
Civil servant (works in state owned organizations)	5		1	-
Private sector	1		-	-
Seasonal worker	1			-
Housewife	46	-	15	-
Pensioner	3	-	2	-
Unemployed	-	-		-
Migrant workers	-	1		-
Students	2		1	
<b>Total</b>	<b>58</b>	<b>68</b>	<b>19</b>	<b>22</b>

Based on the data collected, the workers are paid in cash either daily or monthly depending on their agreement with the herder. Most workers operate on a rotational schedule, typically working 15-day shifts per month.

For the rest of the month, some engage in various forms of casual labour—such as construction work, agricultural tasks at their primary home, taxi driving, or other short-term jobs. These supplementary activities provide additional income, though the exact earnings depend on the type and availability of work.

## 7.8 Incomes

The Minimum wage established in Uzbekistan as of October 2025 is 1,155,000 UZS (approximately 90.5 USD). The poverty rate is determined by the State Statistics Committee based on the minimum consumption expenditure set as 648,000 UZS<sup>26</sup> (50 USD) per person per month.

<sup>26</sup> As per Decree No. PF-69 of April 30, 2024 "On Amendments to Certain Documents of the President of the Republic of Uzbekistan"

The average salary in Bukhara region for 2024 amounted to 4 343 931 UZS (app 340 USD). In Shofirkon district this number was equal to 2 927 150 UZS (app 229 USD) and 3 204 921 UZS (app 251 USD)<sup>27</sup> in Gijduvan district.

Below is a detailed breakdown of the monthly incomes of the surveyed PAHs across the different categories:

- The income of significantly affected herders varies between 12 333 333 UZS (966 USD) (H4) and 50 300 000 UZS (3,941USD) (H12).
- The income of significantly affected workers varies between 2 800 000 UZS (219 USD)(H12W2) and 16 000 000 UZS (1,253 USD) (H14W2).

The main source of income both for herders and their workers is selling livestock. The average monthly income for herders and workers equals to 8 538 606 UZS (669 USD).

Another source of income for the workers is the money earned from grazing livestock owned by the herders. This income stream is specific to workers, with an average monthly income of 2,452,380 UZS (approximately 192 USD). The lowest source of income for both herders and workers is financial assistance for childcare provided by the Mahalla, amounting to 163,636 UZS (approximately 13 USD) per month.

- Herders who are non-significantly affected generate between 8 333 333 UZS (653, USD) (H3) up to 208 333 333 UZS (16,325 USD) (H10).
- Workers who are non-significantly affected generate between 2 166 000 UZS (169 USD) up to 70 750 000 UZS (5,544USD).

The primary source of income for both herders and workers is the sale of livestock, with an average monthly income of 18,015,000 UZS (approximately 1,411 USD). For workers, the second main source of income is the payment received for grazing livestock, averaging 1,523,529 UZS (about 119 USD) per month. The lowest source of income is the financial support provided by family members working abroad, which averages 67,164 UZS (approximately 5 USD) per month.

All PAPs monthly income is above minimum work wage and minimum consumption expenditure.

**Table 7-7 Average household income**

SOURCE OF INCOME	NON- SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	MONTHLY INCOME, IN UZS	ESTIMATE IN USD	MONTHLY INCOME, IN UZS	ESTIMATE IN USD
Selling livestock	18 015 000	1,411	8 538 606	669

<sup>27</sup> <https://buxstat.uz/uz/rasmiy-statistika/labor-market-2>

SOURCE OF INCOME	NON- SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	MONTHLY INCOME, IN UZS	ESTIMATE IN USD	MONTHLY INCOME, IN UZS	ESTIMATE IN USD
Financial assistance from Makhalla for children between 2-14 years old	151 618	12	163 636	13
Salary from grazing livestock	1 523 529	119	2 452 380	192,
Income generated from seasonal work (during grazing rotational shifts)	931324	72	828 409	65
Social assistance (pensions, disability pensions etc)	249 265	19	702 272	55
Support from migrant family member	67 164	5	0	0
<b>Total</b>	<b>20 688 635</b>	<b>1,638</b>	<b>12 521 667</b>	<b>994</b>

Note: Three (3) of the HHs who participated in the household surveys declined to provide their household incomes. These include FR1, H10W1, and H6W2.

Refer to Appendix C for the financial breakdown of PAHs.

## 7.9 Expenditure

Significantly affected PAHs allocate the largest portion of their monthly budget to food, with an average expenditure of 4,027,273 UZS (approximately 315 USD). The next highest expense is related to grazing activities, averaging 2,467,773 UZS (around 193 USD) per month, followed by clothing, which accounts for an average monthly cost of 1,920,788 UZS (about 150 USD).

The lowest monthly expenditures among the significantly affected PAHs are for loan repayments, averaging 343,000 UZS (approximately 27 USD), followed by transportation costs at 533,636 UZS (around 41 USD), and purchases of potable water and gas cylinders, which average 620,894 UZS (approximately 48 USD).

A similar trend is observed among non-significantly affected PAHs. Their highest expenditures are also on food and grazing activities, with average monthly costs of 3,578,176 UZS (approximately 280 USD) and 2,424,686 UZS (around 190 USD), respectively. The lowest expenditures are for utility bills, averaging 662,597 UZS (about 52 USD), and the purchase of potable water and gas cylinders, at 517,184 UZS (approximately 40 USD).

The table below provides a detailed breakdown of the average monthly expenditures of the affected households.

**Table 7-8 Average household expenditure**

EXPENSES	NON- SIGNIFICANTLY AFFECTED		SIGNIFICANTLY AFFECTED	
	MONTHLY EXPENDITURE IN THS UZS	ESTIMATE IN USD	MONTHLY EXPENDITURE IN THS UZS	ESTIMATE IN USD
Expenses for food	3 578 176	280	4 027 273	315
Clothing expenses	1 311 164	102	1 920 788	150
Healthcare&sanotation and Medical services	1 141 353	89	1 038 258	81
Purchase of potable water and gas cylinders	517 184	40	620 894	48
Taxes (payment) for public utilities (electricity, water, gas, etc.)	662 597	52	1 136 023	89
Transportation expenses	533 015	41	533 636	42
Education expenses	1509 701	118	1 598 470	125
Farming/grazing expenses	2 424 686	190	2 467 773	193
Loan repayment	1 092 074	85	343 000	27
Other (household maintance, leisure, wedding etc)	1 784 480	139	1 212 879	95
<b>Total</b>	<b>14 554 430</b>	<b>1,136</b>	<b>14 898 994*</b>	<b>1,165</b>

**Note:** Some PAPs reported only their personal income, even though other household members also contribute financially. In many cases, respondents declined to provide details, either due to a lack of knowledge or an unwillingness to disclose the information. While total household expenditures were reported, complete income data was not captured, which may result in average expenditures appearing higher than reported incomes.

All 78 PAHs reported no challenges in accessing loans. Of these, 30 PAHs have taken out loans for various purposes, including the purchase of vehicles, consumer goods, home repairs, and support for herding activities. The loan repayment periods, and monthly instalments vary among the PAHs, depending on the terms agreed upon with their respective lenders.

Five out of the 30 PAHs are significantly affected households, represented by H5, H5W4, H12W1, H12W2, and H12W3. Among these five, three — H5, H5W4, and H12W2 — reported taking loans specifically to buy livestock or animal fodder.

Refer to Appendix C for the financial breakdown of PAHs.

## 7.10 Accommodation & Living Conditions

All PAHs have their primary residences located outside the Project boundaries, where their families reside year-round. These homes are privately owned and are typically registered under male members of the households, with the exception of H6W5, H8W8, H13, and H16W2, whose homes are registered under female members. The houses are primarily constructed from brick, clay, and/or wood.

According to the data presented in the table below, most basic household appliances—such as televisions, refrigerators, and mobile phones—are commonly owned across all households.

**Table 7-9 Household Amenities**

EQUIPMENT	NON- SIGNIFICANTLY AFFECTED HOUSEHOLDS		SIGNIFICANTLY AFFECTED HOUSEHOLDS	
	✓	✗	✓	✗
Car	33	23	5	12
Motorcycle	15	41	3	14
TV	55	1	17	0
Gas cylinder	38	18	15	2
Washing machine	32	24	8	9
Refrigerator	56	0	17	0
Air conditioner	12	44	3	14
Greenhouse	1	55	0	17
Personal computer	6	50	2	15
Mobile Phone	54	2	16	1
Internet connection (even if it is through phone)	51	5	13	4
Oven	44	12	12	5

In addition to the above, herders have constructed accommodation structures within the Project site to support grazing activities. These structures are used throughout the year on a rotational basis by both herders and workers. They are basic in nature and are not formally registered with the cadastral department.

### 7.10.1 Household Amenities

#### 7.10.1.1 Significantly impacted households

Out of 17 significantly impacted households, 5 (H5W4, H7, H12W1, H12W2, H14W2) do not have access to a centralized gas supply. For cooking, they rely on gas cylinders. Although H12 and H14 are technically connected to a centralized gas system, the supply is either unstable or non-functional. As a result, these two households also depend on gas cylinders for cooking.

Only 3 households (H4, H5, H5W5) have access to central heating. The remaining 14 rely on coal, wood, or gas for heating.

None of the 17 households have access to a sewage system: all use pit latrines instead.

While all 17 households are supplied with electricity, 5 (H12, H12W3, H14, H14W2, H14W3) reported frequent power interruptions.

Drinking and household water comes from various sources. Eight households (H4W1, H4W3, H5, H5W3, H5W5, H5W6, H7) primarily use a water pump located within their home. Additionally, 9 households (H4, H4W2, H4W3, H5, H5W3, H5W6, H7, H12W2, H12W3) purchase bottled water.

Eight households (H4, H4W1, H4W2, H5W6, H7, H12W2, H12W3, H14W3) experience potable water shortages, while remaining 9 reported that there is no shortage of water for their households. Five (H5W4, H5W3, H12, H12W3, H14W3) expressed dissatisfaction with water quality, primarily because of high salinity while the others stated they were satisfied with its quality.

Solid waste management is handled by local waste disposal services (mainly the Toza Hudud organization) for 13 households. Meanwhile, 3 households (H5W4, H12W1, H12W2) dispose of their household waste in a designated pit in their yard. H5W6 takes waste directly to the local disposal site.

### **7.10.1.2 Non significantly impacted households**

Out of 56 households, 36% are connected to the central gas supply but experience frequent interruptions and therefore supplement with gas cylinders to maintain a stable cooking process. 23% are not connected to the central gas system at all and rely entirely on gas cylinders. The remaining 41% report stable and uninterrupted access to the central gas supply.

Additionally, only 6 households (H2W3, H9, H13, H15W1, H16W2, H22,) have functioning central heating, while 3 others (H1, H2, H3W3) have access to it but reported experiencing frequent service interruptions. The vast majority, 47 households, lack central heating and use alternative sources such as coal, wood, and gas cylinders for heating their homes

None of 56 PAHs have sewage connection and all use a pit latrine instead.

All 56 households are connected to the central electricity grid. However, 21% reported frequent power outages, indicating an inconsistent electricity supply.

Regarding access to potable water, 13% of households (H1W2, H2W3, H3W4, H6W1, H8W2, H8W5, and H13) rely on water pumps located within their yards as their primary source. The majority—87% - purchase bottled water for drinking and general household use.

Water shortages are a concern for 29 households, while the remaining 27 report having a consistent water supply. A total of 25 households expressed dissatisfaction with water quality, citing high salinity and occasional mud content. Additionally, two households (H10W2 and H23) reported incidents of stomach and liver illnesses in 2023 among both adults and children, which they attribute to the poor quality of drinking water.

Local waste management services are available to 46 households, which have their waste collected and disposed of by municipal service providers. Nine households (H1, H2, H3W4, H6W1, H6W5, H8W8, H20, H24, H23), however, manage waste independently by disposing of it

in pits in their yards, while one household (H13W1) transports waste to a designated disposal site.

#### **AMENITIES AT THE PROJECT SITE**

Herders use the structures within the site boundaries throughout the year, primarily on a rotational basis. Due to the site's remoteness and the informal nature of these structures, none of the accommodation units are connected to centralized gas, sewerage, or water systems. Instead, PAPs use gas cylinders for cooking and pit latrines for sanitation. Solid waste is typically disposed of in pits.

Regarding electricity, nearly all settlements rely on off-grid sources, including generators or solar panels. None of the households are connected to the national electricity grid

### **7.11 Women in PAHs**

There are no female-headed households among the 78 PAHs. Within these households, a total of 257 females have been identified.

Among the surveyed households, spouses are predominantly homemakers (79%). Additionally, 6% are pensioners, 4% are undergraduate students, and 8% are civil servants. Survey results indicate that the majority of women are responsible for household chores such as cooking, cleaning, and childcare.

Furthermore, 51% of respondents reported that women are involved in managing household finances, including shopping and overseeing the day-to-day functioning of the household.

The spouses of H1W3, H15W4, and H13W1 visit the Project site during lambing, shearing, and breeding seasons to assist with cooking and cleaning. Although these women are paid approximately 120,000 UZS (USD 9) per day by the herders employing their husbands, the payments are made to their husbands. H17's wife also supports her husband during these peak seasons, but she does not receive any payment for her work.

### **7.12 Vulnerable Households**

The household-level socioeconomic surveys undertaken as part of the draft RAP study entailed a vulnerability analysis to identify PAHs whose livelihoods may be impacted disproportionately due to one or more pre-existing elements of socioeconomic instability, marginalization, and proneness to impoverishment.

The following criteria were applied for the identification of socioeconomically vulnerable PAHs:

- Household with one or more physically and/or mentally disabled members
- Household with one or more chronically sick members

- Household with an overall monthly income level that is below the national poverty line
- Household with informal land use potentially impacted by the Project
- Household with female headship
- Household with child headship
- PAPs that will experience loss of more than 10% of the land they use whether on a permanent or temporary basis

Based on the above, the table below provides the PAHs identified as vulnerable.

**Table 7-10 Number of vulnerable PAHs**

NO	ELEMENT OF VULNERABILITY	NUMBER OF PAHs
1	Physical and/or mental disability	10 (H23,H19W1, H8W9, H6W5, H2W3, H1, H5W5, H12, H12W3, H12W2)
2	Chronic illness	11 (H6, H4, H19W2, H10W2, H9W2, H12W3, H12, H24, H23, H22H3, H19)
3	Female household headship	0
4	Child-headed households	0
5	Informal employment, tenure of affected land use/ resources	70 (all 67workers, H15, H16, H23)
6	Extreme poverty and those falling below the national poverty line	n/a
7	IP	n/a
8	PAHs that would be significantly affected by the Project.	18 H4,H4W1, H4W2, H4W3 H5, H5W3, H5W4, H5W5, H5W6, H5W7 H7 H12, H12W1, H12W2, H12W3 H14, H14W2,H14W3
<b>Total number of vulnerable PAHs</b>		<b>66</b>
<b>Total number of vulnerable PAPs</b>		<b>442</b>

### 7.13 Significantly Affected PAPs

Five herders — H4, H5, H7, H12, and H14 — are expected to experience significant impacts due to physical displacement caused by noise. Apart from H14, these herders and their workers will also face grazing land impacts of 10% or more during the construction phase. In total, these five herders employ 17 workers<sup>28</sup> (Refer to Chapter 9 for more details). Of the 17 workers, four

<sup>28</sup> Workers who will be significantly affected include H4W1, H4W2, H4W3, H4W4, H5W2, H5W3, H5W4,H5W5, H5W6, H5W7, H7W1,H12W1, H12W2, H12W3, H14W1, H14W2, H14W3.

share the same household as the herders. These include H4 and H4W4, H5 and H5W2, H7 and H7W1, as well as H14 and H14W1, who are from the same households.

It is noted that the five herders and their workers can relocate their structures to unimpacted areas of the Project site and grazing can also continue outside of the Project footprint. Additionally, these PAPs will receive compensation and transitional support entitlements as provided in Chapter 10.

### 7.14 Impacts of the Project as Perceived by PAPs

During the socio-economic surveys, HHs were asked about their main concerns regarding the Project development and its potential impact on their livelihoods. The feedback received is provided in the figure below.

The majority expect an improvement on power supply while concerns were also raised about the impact on grazing land and the assets PAPs have constructed within the Project boundaries.

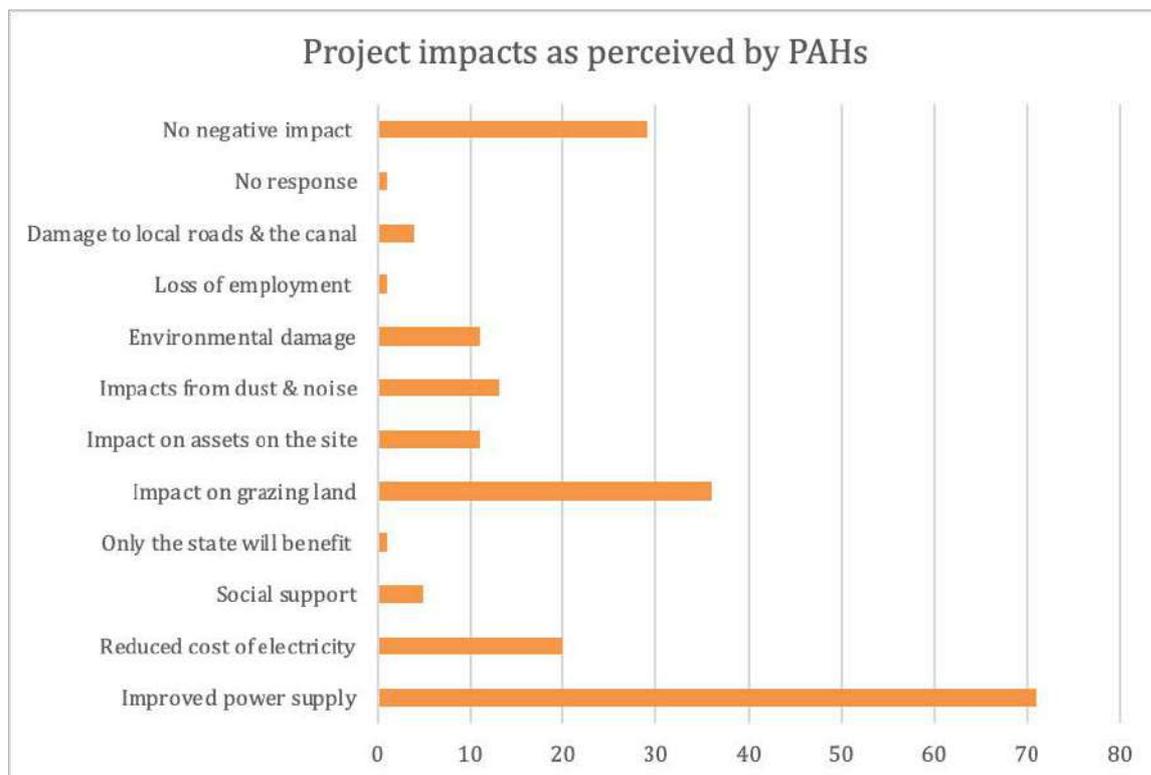


Figure 7-1 Feedback received from PAHs

## 8 ASSET INVENTORY AND VALUATION

### 8.1 Valuation Expertise

The inventory and valuation process were conducted by LLC Evaluation Consulting Centre (Sirdaryo Mustakil Baholash Va Ekspertiza) who are licensed by the Republic State Committee for Privatization and Development of Competition (see Appendix D for their license). The valuator was involved in the inventory and valuation of all the assets of the PAPs within the Project footprint.

### 8.2 Survey Process

#### 8.2.1 Survey objectives

The asset inventory and valuation survey were conducted in parallel with the census and socioeconomic survey.

The objectives of the asset inventory survey include the following:

- To inventory and value all constructed (immovable) structures and fixtures on the Project site, to determine due compensation for loss of built assets attached to potentially withdrawn land.
- To identify livestock fed on potentially withdrawn pastoral land, by formal and/or informal land rights holders employed in herding and/or livestock rearing, to determine compensation for the loss of pastoral resources.
- To identify all employees that are subject to loss of employment from substantial withdrawal of productive land and income-generating establishments, to determine transitional support prior to the absorption of impacted workers into new jobs/ labour.
- The overall purpose of the asset inventory and valuation survey was to establish compensation entitlements for all leaseholders and users that had access to the affected pastoral land.

#### 8.2.2 Survey Timeline

The announcement of the cut-off date was tailored to fit the availability of the land users and to ensure there was no disruption on their herding activities. Any developments made on affected land after this date will not be eligible for further valuation or compensation. This measure is implemented to:

- Prevent existing land users from making opportunistic land developments to artificially increase their compensation.

- Prevent unauthorized entities, who had no prior access to the affected land, from making false claims for compensation.

**Table 8-1 Cut off Dates**

PROJECT COMPONENT	CUT-OFF DATE ISSUED	TARGETED PAPs	TARGETED ASSETS
WF/OHTL	20 <sup>th</sup> July 2024	All PAPs	All assets used by PAPs

## 8.3 Valuation Standards

The fundamental valuation of surveyed and inventoried land and fixed assets was undertaken in conformity with procedures and methods prescribed in pertinent laws and regulations. Where regulatory requirements fall short of valuation and compensation requirements set out in performance standards pertaining to the Project Lenders, the gaps were bridged to meet the more stringent, internationally recognized standards.

The following sub-sections provide a purposive overview of the principles, methods and guiding standards used for the valuation of project-affected landholdings, immovable assets fixed on affected land plots, and related income losses.

### 8.3.1 Valuation of buildings & fixtures

The valuation of residential and non-residential buildings and fixtures is based on procedures and methods specified in the following laws and regulations:

- Order of the Director of the State Assets Management Agency of the Republic of Uzbekistan (dated 28.12.2023, registration number: 3487, unified national standard of valuation and methodology of the Republic of Uzbekistan)
- Law of the Republic of Uzbekistan on Valuation Activity (Decree of 19.08.1999 N 811-I)
- Decree of the Cabinet of Ministers of the Republic of Uzbekistan from 16.11.2019 N 911 (dated June 29.2022)
- Law RK-781 on procedures for withdrawal of land plots for public needs with compensation

The method aims to establish the replacement cost of various buildings constructed on project-affected land plots. The valuation procedures consider, inter alia, the types of construction materials, quantity of each, and the current market price of the materials within local markets.

To align the regulatory methodology with performance requirements of Project Lenders, depreciation was not factored into the compensation analysis, such that the valuation does not undercut the full replacement value of buildings on withdrawn land.

### 8.3.2 Survey Procedures

The asset inventory and valuation survey were conducted by an expert team including expert valuers from a licensed service provider. The asset inventory surveys were conducted within the project site boundary in the presence of the PAPs.

### 8.3.3 Valuation of loss of pastural land

The valuation methodology for project-affected pastural land plots follows the technical guidance established in laws, regulations and guidelines, which include the following:

- Resolution of the Cabinet of Ministers of the Republic of Uzbekistan No. 235 dated 18 August 2014, "On the Procedure for Determining the Normative Value of Agricultural Crop Land"
- According to Resolution No. 235, the normative value of natural fodder lands (pastures and hayfields) is determined based on:
  - The type of pasture,
  - Its productivity expressed in fodder units
  - Conversion of fodder productivity into wheat-equivalent yield, as set out in Annex 7 of the Regulation.

The value of 1 hectare of pastureland is calculated using:

- The average fodder productivity of the pasture
- The wheat-equivalent yield, and
- The average market price of wheat, based on official regional statistics (including data published by the Bukhara Regional Statistics Office).

The normative pasture area required per livestock unit is determined based on applicable grazing norms. Where official data from local budget organizations is unavailable, average normative indicators are applied using expert judgment and publicly available sources, consistent with valuation practice.

### 8.3.4 Valuation of livestock feed

The valuation of livestock feed that would be required in the absence of replacement pastural land (i.e., in-kind compensation) is guided by the following pertinent laws:

- Decree of the Cabinet of Ministers of the Republic of Uzbekistan, (Decree of 25.05.2011 N 146),
- Decree of the Cabinet of Ministers of the Republic of Uzbekistan from 16.11.2019 N 911 and Decree Number 235.

The methodology aims to derive the full cost of purchasing livestock feed following the withdrawal of pastural land for grazing and livestock rearing. The workings take into account

the types and quantity of reared livestock, the fodder demand for each livestock category, and the pastoral yield of project-affected pastoral land parcels.

### 8.3.5 Additional Lenders Requirements for the Project

Lenders require compensation to be provided in full replacement value and as such the cost of depreciation will not be deducted from the compensation packages of the PAPs.

Where in kind compensation is preferred by the PAPs, and appropriate replacement structures are available, the value of the replacement residential and/or non-residential structure will be equal to or over the full replacement cost of structures that have been lost.

### 8.3.6 Compensation for Vulnerable Groups

The Uzbekistan law does not provide any requirements for the support or assistance of vulnerable groups in relation to livelihood restoration because of Project development. However, the Project will be required to provide support to vulnerable groups to meet Lenders' requirements. The vulnerable PAPs have been identified in the socio-economic survey details of which are provided in Section 7.14.

## 8.4 Preparation of Compensation Entitlements

After completing the on-site asset inventory surveys, an initial valuation was conducted to determine the required compensation, adhering to mandatory regulations. A subsequent valuation (documentary) round was performed to address any discrepancies between the mandatory compensation requirements and the standards set by the Project Lenders. The total amounts for both mandatory and conditional compensation, as determined by the valuation analysis, are provided in Chapter 11 of this draft RAP.

## 8.5 Verification of Entitlements

The Consultant will undertake a verification review of entitlements in the draft RAP through its disclosure to the PAPs. The purpose of this will be to ensure that the compensatory entitlements were correctly determined during the valuation process. Additionally, the disclosure will allow PAPs to provide feedback on non-monetary livelihood restoration entitlements.

Regarding compensation entitlements, if PAPs dispute the asset inventory and valuation results, the following remedial actions will be taken, depending on the validity of the objections:

- If the objection is valid due to valuation gaps or errors, an on-site validation survey will be conducted, followed by a revision of the valuation results and updated compensation entitlements.

- If the objection is invalid, stemming from a misunderstanding or misinterpretation of the valuation and compensation criteria, the draft and final RAP team will provide necessary clarifications to resolve the issue.
- Any unresolved disputes will be referred to the RAP Committee.

## 8.6 Disclosure of the Approved RAP and Compensation Packages

After verifying the monetary compensation and transitional support entitlements, the approved draft and final RAP and compensation packages will be disclosed to PAPs through both individual and group meetings, as applicable.

This draft RAP has been developed through meaningful consultations and participatory discussions with PAPs, local authorities and other relevant stakeholders. To promote transparency and inclusivity, PAPs have been, and will continue to be, consulted on the compensation methodology, support measures (whether cash or in-kind), and livelihood restoration initiatives beyond compensation.

This participatory approach ensures that the concerns and feedback of those directly affected are incorporated into the final RAP. It reflects a collaborative effort that integrates local knowledge and expertise. Following the formal disclosure of the draft RAP to broader stakeholders, it will undergo further reviews and improvements before being finalized, ensuring that the final plan is responsive and aligned with the PAPs perspectives and expectations.

## 8.7 Management of Grievances

During the review and validation process, all additional requests and objections have been, and will continue to be, addressed in both individual and group meetings with PAPs. If PAPs find the remedial actions unsatisfactory, they can file grievances, which may require further corrective measures. All grievances will be investigated and resolved through a structured process involving the Consultant's technical experts, the Project Developer, and, if necessary, the RAP committee, following the procedures of the Project's GRM (refer to Chapter 6 above for more details).

## 9 PHYSICAL AND ECONOMIC DISPLACEMENT

This section describes the potential involuntary resettlement impacts caused by the Project land requirements defined in Chapter 5. The potential impacts described in this section are based on the outcome of the surveys and consultations undertaken as part of the Project.

### 9.1 Physical Displacement

As discussed in the sections above, herders within the Project boundaries have constructed unregistered structures to support their herding activities. These structures primarily consist of accommodation houses and animal stables, which are used year-round by the herders and their workers. However, it is important to note that the accommodation houses are not their primary<sup>29</sup> residences and are instead used on a rotational basis based on the grazing schedule.

While the Project footprint is not expected to result into physical displacement, the operational phase impacts related to noise will lead to physical displacement as detailed in the section below.

#### 9.1.1 Operational Noise Impacts

During the operational phase of the WTGs, noise will be generated from mechanical and aerodynamic sources. Both mechanical and aerodynamic noise may result in propagation to areas within 2km of the WTGs. Mechanical noise is radiated by the surface of the turbine and by openings in the nacelle housing and will emanate from generator, gearbox, yaw drives etc. These components produce their own characteristic noise. Aerodynamic noise will be produced by the flow of air over the blades. This is the major source of noise during operations, and it generally increases as rotor speed increases.

To assess the noise impacts on receptors, a detailed noise modelling assessment was undertaken as part of the Project specific ESIA in accordance with the IFC EHS Guidelines on Wind Energy. The table below shows the outcome of the modelling and further details of the same can be obtained in the ESIA Vol 2.

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<sup>29</sup> It is noted that the PAPs have provided proof of their primary residences addresses which are located outside of the Project area. Their families live in these primary residences.

**Table 9-1 Compliance Status with IFC/Uzbekistan Assessment Limits**

RECEPTOR AS PER MODELLING REPORT	PAP CODE IN THE RAP	RECEPTOR CLASSIFICATION	NEAREST WTG	DISTANCE (M)	COMPLIANCE STATUS		PREDICTED NOISE LEVELS
					IFC GENERAL / UZBEKISTAN DAYTIME 53 DB CRITERIA	IFC GENERAL / UZBEKISTAN NIGHT-TIME 43 DB CRITERIA	
F1	F1	Fishpond	BSH2-08	2018	Y	Y	36
H1	H1	Herder's House	BSH2-01	1100	Y	Y	40
H2-a <sup>30</sup>	H2	Herder's House	BSH2-02	1994	Y	Y	37
H2-b		Herder's House	BSH2-04	1147	Y	Y	41
H3	H3	Herder's House	BSH2-19	1065	Y	Y	43
H4-a	H4	Herder's House	BSH2-09	537	Y	N	47
H4-b		Herder's House	BSH2-09	522	Y	N	47
H5-a	H5	Herder's House	BSH2-15	583	Y	N	48
H5-b		Herder's House	BSH2-15	547	Y	N	48
H6-a	H6	Herder's House (Trailer)	BSH2-30	1239	Y	Y	43
H6-b		Herder's House	BSH2-28	1893	Y	Y	43
H7	H7	Herder's House (Trailer)	BSH2-24	368	Y	N	51
H8-a	H8	Herder's House	BSH2-07	1657	Y	Y	38
H10-a	H10	Herder's House	BSH2-11	1295	Y	Y	43
F2		Fishpond	BSH2-11	1295	Y	Y	43
H10-b		Herders house (partially demolished & not in use)	BSH2-11	1221	Y	N	44
H12-a	H12	Herder's House	BSH2-36	836	Y	Y	43
H12-b		Herder's House	BSH2-18	420	Y	N	50

<sup>30</sup> The suffixes a, b, c, d, etc. following the PAP code indicate that the PAP owns structures at different locations within the Project boundaries.

RECEPTOR AS PER MODELLING REPORT	PAP CODE IN THE RAP	RECEPTOR CLASSIFICATION	NEAREST WTG	DISTANCE (M)	COMPLIANCE STATUS		PREDICTED NOISE LEVELS
					IFC GENERAL / UZBEKISTAN DAYTIME 53 DB CRITERIA	IFC GENERAL / UZBEKISTAN NIGHT-TIME 43 DB CRITERIA	
H14-a	H14	Herder's House	BSH2-38	558	Y	N	48
H14-b		Herder's House	BSH2-37	570	Y	N	46
H 14-c		Herder's House (Trailer)	BSH2-39	232	N	N	58
H14-d		Herder's House	BSH2-40	1664	Y	Y	38
H14-e		Herder's House	BSH2-40	1574	Y	Y	39
H18	H18	Herder's House	BSH2-35	1584	Y	Y	40
H19	H19	Herder's House	BSH2-30	2524	Y	Y	38

**Note:** **Y:** Yes, Compliant and **N:** Not Compliant

Based on the outcome of the modelling, it was determined that the noise at H4 (a, b), H5 (a, b), H7, H10 (b) H12 (b), H14 (a, b, c) exceeds the national or IFC guidelines as shown in the table above. As such, these structures will require to be moved to other areas outside the noise impact area on land currently still used by these PAPs.

### 9.1.2 Shadow & Flicker Impacts

Shadow flicker modelling was undertaken for the Project as part of the ESIA. Based on the outcome of the modelling, it is predicted that under worst-case scenario that the structures under H10 (a), H3, H4 (a, b), H5 (a, b), H6 (a), H7, H8 (a), H12 (b), H14 (a, b, c) within the Project site will experience shadow flicker which exceed the IFC recommended limit of 30 hours per year or 30 minutes per day. However, it should be noted that the worst-case scenario provides an over estimation of the duration of shadow flicker occurrence at the receptor location.

Based on the outcome above, it can be determined that some of the PAPs will experience noise and shadow flicker impacts while others will only experience shadow & flicker impacts. This is as shown in the table below.

**Table 9-2 Detail of Noise and Shadow Flicker Impacts**

PAP CODE (OWNER)	OTHER PAPs USING THE STRUCTURES	TYPE OF STRUCTURE	MOVABLE OR IMMOVABLE	NUMBER OF STRUCTURES	TYPE OF IMPACT	MITIGATION MEASURE
H3	H3 workers – H3W1, H3W2, H3W3, H3W4, H3W5, H3W6 H24	House	Immovable	1	Flicker	<ul style="list-style-type: none"> <li>Modification required to windows and doors before the start of the operational phase.</li> <li>The PAPs will have access to the GRM.</li> </ul>
H4 (a & b)	H4 workers – H4W1, H4W2, H4W3, H4W4	House	Immovable	1	Noise & flicker	<ul style="list-style-type: none"> <li>These structures will require to be relocated outside of the impact zone.</li> <li>This herder still has land that is unimpacted by the Project facilities including outside of the Project boundaries. As such, these structures can be relocated within this area.</li> <li>The PAPs will have access to the GRM.</li> </ul>
		Well	Immovable	1		
		Stables	Immovable	4		
		Wickets	Immovable	2		
		Canopies	Immovable	2		
		Hayloft	Immovable	1		
		Well	Immovable	1		
		Toilet	Immovable	1		
H5 (a, b)	H5 workers –H5W2, H5W3, H5W4, H5W5, H5W6, H5W7	House	Immovable	1	Noise & flicker	<ul style="list-style-type: none"> <li>These structures will require to be relocated outside of the impact zone.</li> <li>This herder still has land that is unimpacted by the Project facilities including outside of the Project boundaries. As such, these structures can be relocated within this area.</li> <li>The PAPs will have access to the GRM.</li> </ul>
		Toilet	Immovable	1		
		Walls	Immovable	2		
		Wicket	Immovable	1		
		Canopy	Immovable	1		
		Storage Shed	Immovable	1		
		Pool	Immovable	1		
		Well	Immovable	1		
		Borehole	Immovable	1		
		Substructure	Immovable	1		
		Concrete area	Immovable	1		
		Gravel area	Immovable	1		
		Porch	Immovable	1		
H6 (a)	H6 workers – H6W1, H6W2, H6W4, H6W5	Stable	Immovable	1	Flicker	<ul style="list-style-type: none"> <li>The stable and wicket will not require to be relocated and can remain within the same area.</li> <li>The trailer position can also be adjusted so that the door and window(s) face away from the WTGs.</li> <li>Alternatively, the trailer can also be moved outside of the shadow &amp; flicker impact zone within the same land currently being used by the herder.</li> <li>The PAPs will also have access to the GRM.</li> </ul>
		Wicket	Immovable	1		
		Trailer	Movable	1		
H8 (a)	H8 workers - H8W2, H8W3, H8W4, H8W5, H8W6, H8W7, H8W8, H8W9	House	Immovable	1	Flicker	<ul style="list-style-type: none"> <li>The house used for accommodation by the herder and his workers will require to be modified (in relation to the location of doors and windows) before the start of the operational phase.</li> <li>The PAPs will have access to the GRM.</li> </ul>
		Canopy	Immovable	2		
		Wall	Immovable	2		
		Water tank	Immovable	1		

PAP CODE (OWNER)	OTHER PAPs USING THE STRUCTURES	TYPE OF STRUCTURE	MOVABLE OR IMMOVABLE	NUMBER OF STRUCTURES	TYPE OF IMPACT	MITIGATION MEASURE
		Wicket	Immovable	1		
		Pool	Immovable	1		
		Well	Immovable	1		
H7	H7 worker- H7W1	Trailer	Movable	1	Noise & Flicker	<ul style="list-style-type: none"> <li>This is a movable trailer that can be relocated to H7 grazing land that is not affected by the Project impacts.</li> <li>The PAPs will have access to the GRM.</li> </ul>
H10 (a)	H10 workers – H10W1, H10W2, H10W3 H11 and his workers – H11W1, H11W2	Fishpond	Immovable	1	Flicker	<ul style="list-style-type: none"> <li>The house used for accommodation by the herders and their workers will require to be modified (in relation to the location of doors and windows) before the start of the operational phase.</li> <li>The PAPs will have access to the GRM.</li> </ul>
		House	Immovable	1		
		Sheepfold	Immovable	1		
		Canopy	Immovable	1		
		Wicket	Immovable	1		
H10 (b)	This house is uninhabitable and is partially demolished.	House (inactive)	Immovable	1	Noise & flicker	<ul style="list-style-type: none"> <li>The house is uninhabitable and with no roof as shown in the figure below, but the herder uses it to store hay.</li> </ul> 
H12 (a)	H12 workers – H12W1, H12W2, H12W3	House	Immovable	1	Flicker	<ul style="list-style-type: none"> <li>These structures are located outside of the Project boundaries. The impacts from shadow &amp; flicker will be mitigated through the modification of the house doors &amp; windows before the start of the operational phase.</li> <li>The PAPs will have access to the GRM.</li> </ul>
		Toilet	Immovable	1		
		Canopy	Immovable	2		
		Wall	Immovable	1		
		Wicket	Immovable	1		
		Water tank	Movable	1		
H12 (b, c)	H12 workers – H12W1, H12W2, H12W3	House	Immovable	1	Noise & flicker	<ul style="list-style-type: none"> <li>These structures will require to be relocated outside of the impact zone.</li> <li>This herder still has land that is unimpacted by the Project facilities. As such, these structures can be relocated within this area.</li> <li>The PAPs will also have access to the GRM.</li> </ul>
		Wall	Immovable	1		
		Canopy	Immovable	1		
		Toilet	Immovable	1		
		Wicket	Immovable	1		
		Manger	Immovable	1		
H14 (a)	H14 workers – H14W1, H14W2, H14W3	House	Immovable	1	Noise & flicker	<ul style="list-style-type: none"> <li>These structures will require to be relocated outside of the impact zone.</li> <li>This herder still has land that is unimpacted by the Project facilities. As such, these structures can be relocated within this area. Additionally, he has additional structures to the southwest of the site that are not going to be impacted by the Project.</li> </ul>
		Oven	Immovable	1		
		Well	Immovable	1		
		Stable	Immovable	1		

PAP CODE (OWNER)	OTHER PAPs USING THE STRUCTURES	TYPE OF STRUCTURE	MOVABLE OR IMMOVABLE	NUMBER OF STRUCTURES	TYPE OF IMPACT	MITIGATION MEASURE
		Wicket	Immovable	1		<ul style="list-style-type: none"> <li>The PAPs will also have access to the GRM.</li> </ul>
		Canopy	Immovable	1		
H14 (b)		House	Immovable	1		
		Well	Immovable	1		
14 (c)		Trailer	Movable	1		

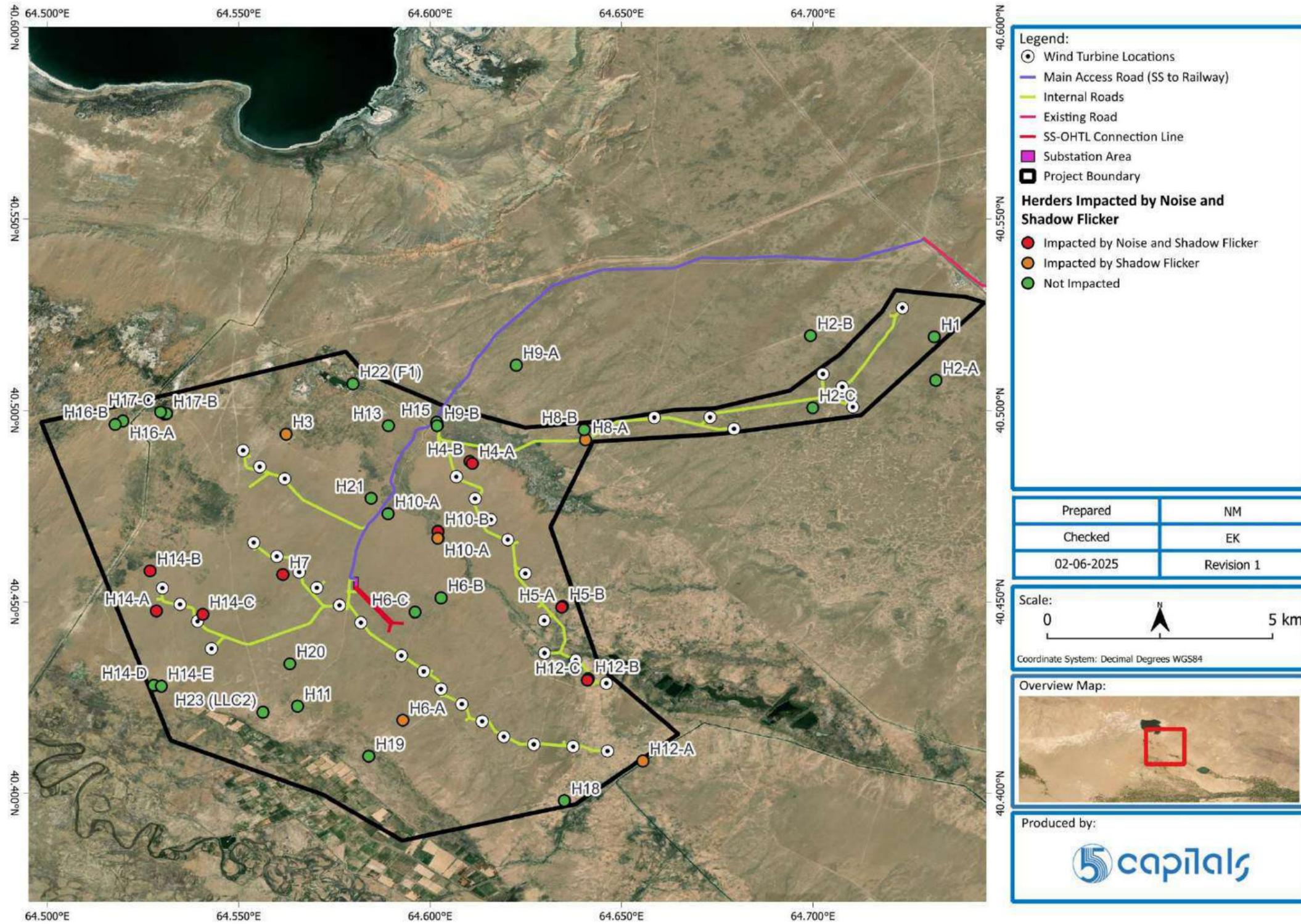


Figure 9-1 Location of structures impacted by noise, shadow & flicker

**Table 9-3 Summary of Physical Displacement Impacts from Noise and Shadow Flicker**

RECEPTOR AS PER MODELLING REPORT	PAP CODE IN THE RAP	ACCOMMODATION STRUCTURE		TYPE OF IMPACT		ACTION REQUIRED	
		IMMOVABLE	MOVABLE	NOISE, SHADOW & FLICKER	SHADOW & FLICKER	MODIFICATION	RELOCATION
H3	H3	■	n/a	n/a	■	■	n/a
H4 (a, b)	H4	■	n/a	■	n/a	n/a	■
H5 (a, b)	H5	■	n/a	■	n/a	n/a	■
H6 a	H6	n/a	■	n/a	■	n/a	■
H7	H7	n/a	■	■	n/a	n/a	■
H8 a	H8	■	n/a	n/a	■	■	n/a
H10a	H10	■	n/a	n/a	■	■	n/a
H10b <sup>31</sup>		■	n/a	■	n/a	n/a	■
H12a	H12	■	n/a	n/a	■	■	n/a
H12 (b c)		■	n/a	■	n/a	n/a	■
H14a	H14	■	n/a	■	n/a	n/a	■
H14b		■	n/a	■	n/a	n/a	■
H14c		n/a	■	■	n/a	n/a	■

Based on the table above, 5 herders along with a total of 17 workers will need to relocate due to noise and shadow flicker. These include Herders H4, H5, H12, and H14, (along with their workers), will be more significantly impacted, as their immovable and movable structures will need to be relocated prior to the commencement of the operational phase. It is noted that each of these herders have unimpacted land suitable for relocation and grazing, and therefore, no replacement land will be required.

H7 has a movable trailer, which can be relocated to an area outside the noise impact zone within the same parcel of land currently in use.

H10 is not expected to experience significant impact as the partially demolished structure impacted by noise is only used for hay storage and is uninhabitable.

<sup>31</sup> This structure is partially demolished and only used by the herder to store hay.

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In relation to the shadow flicker impact, 7 herders and a total of 26 workers are expected to be affected. These include H3 (who shares accommodation with H24), H6, H8, H10 (who shares with H11), and H12(a). Among the seven herders, four — H3, H8, H10, and H12 — are the actual owners of the affected structures. These structures will require modifications to windows and doors to mitigate shadow flicker effects during the operational phase of the Project. Additionally, the position of H6's trailer will be adjusted or relocated outside the shadow flicker zone.

To ensure effective mitigation, the Project Company will assign a qualified Project Engineer to assess the structural integrity of the structures that need modification. Based on the evaluation results, a decision will be made on whether the structures can be safely modified, or relocation will be required. In such cases, compensation to the PAPs will be determined based on the impacted assets.

In addition, monitoring will be conducted to assess the effectiveness of these measures and determine whether additional corrective action is necessary. All affected herders and their workers will continue to have access to the grievance redress mechanism throughout the Project's life cycle.

## 9.2 Economic Displacement

The construction and operational phases of the Project will result in both temporary and permanent impacts on grazing land. These impacts will be limited to the actual Project footprint and will not affect the entirety of the land within the designated Project boundaries.

### 9.2.1 Construction Phase Impacts

Temporary impacts during the construction phase will arise from the construction of the laydown and storage areas, but the impacted land will be restored at the end of the construction phase.

The construction of the 500kV OHTL will also result in short-term temporary impacts during the construction phase. These impacts will occur within a 30 m construction zone. While this area will be affected during construction, grazing activities will resume at the end of the construction phase. The land within the OHTL construction area is used by H7, H6, and three of H6 workers for grazing purposes.

Since the land outside of the Project facilities will remain available for grazing, the Project will implement a 250 m safety buffer zone around the WTG construction areas and a 30 m buffer on each side of the access roads. Grazing activities will be restricted within these buffer zones during the construction phase to ensure the safety of herders and their livestock, due to the movement of heavy vehicles, machinery, and the assembly of WTG components. The Social

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Manager and Community Liaison Officer (CLO) will be responsible for coordinating with the Project Health and Safety team to carry out awareness-raising campaigns with the herders and their workers regarding the areas that are restricted for grazing. Additionally, the EPC Contractor will be prohibited from encroaching on areas outside the defined Project footprint.

The above impact on grazing land will impact 23 herders who graze livestock within their respective areas. Out of these 23 herders, 3 herders (H3, H10 and H13) also graze sheep on behalf of Kokcha LLC in addition to their own private livestock. Additionally, there are 39 workers who also graze their own livestock alongside that of their employer. The breakdown of livestock owned by the herders and the workers is provided in Appendix E.

### 9.2.2 Operational Phase Impact

No additional land take will be required for the operational phase of the Project. However, a Health Protection Zone (HPZ) will be established for both the 500kV OHTL and the WTGs. Following consultations with the Sanitary Epidemiological Public Health Committee, a HPZ of 250 meters will be implemented around each WTG. Additionally, a 30 m buffer zone will be implemented on each side of the 500 kV OHTL, measured from the outermost conductors.

Site visits confirmed that no permanent structures currently exist within these designated HPZs, except for a movable trailer owned by H14(c). This trailer is also impacted by noise and shadow flicker and will therefore need to be relocated as discussed above.

In line with national regulations, construction of new structures will be prohibited within the HPZs of both the WTGs and the OHTL. However, livestock grazing will be permitted.

**Table 9-4 Details on the land impacted by the Project (approximated)**

No	PAP ID	WORKERS/OR OTHER HERDERS GRAZING THEIR OWN LIVESTOCK WITHIN THE SAME LAND	PROJECT COMPONENT	TYPE OF LAND USE	TOTAL LAND SIZE (HA <sup>32</sup> )	TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES		TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES + CONSTRUCTION SAFETY ZONE		PERMANENTLY AFFECTED LAND SIZE (HA)	SCALE OF IMPACT IN %	TOTAL % (CONSTRUCTION + OPERATION)	REMARK
						LAND SIZE (HA)	SCALE OF IMPACT IN %	LAND SIZE (HA)	SCALE OF IMPACT IN %				
1	H1	<b>H1 Workers:</b> H1W1, H1W3, H1W5 <b>H2 worker:</b> H2W2	Access road WTGs	Grazing	4,803	21.90	0.46	228.94	4.77	21.90	0.46	4.77	<ul style="list-style-type: none"> <li>• These herders each hold a lease but there is no demarcation to the land showing the boundaries.</li> <li>• H1 has employed 5 waged workers 3 of whom own livestock while H2 has 3 waged workers and one of them also owns livestock.</li> <li>• The impact on this land will be mostly from the construction safety zone. However, this area will be accessible to them during the operational phase for grazing purposes.</li> </ul>
2	H2					6.12	0.48	74.48	5.87	6.12	0.48	5.87	
3	H3	<b>H3 worker:</b> H3W2	Access road WTGs	Grazing	1,268	6.12	0.48	74.48	5.87	6.12	0.48	5.87	<ul style="list-style-type: none"> <li>• They each hold a separate lease agreement, but they share the grazing land.</li> <li>• H3 employs 5 waged workers and 1 next of kin, of which 1 worker has their own private livestock.</li> <li>• The impact on the grazing land is considered minor compared to the overall land available to these herders and the worker.</li> </ul>
4	H24					6.12	0.48	74.48	5.87	6.12	0.48	5.87	
5	H4	<b>H4 workers:</b> H4W1, H4W2, H4W3	Access road & WTGs	Grazing	1,023	8.40	0.82	112.94	11.04	8.40	0.82	11.04	<ul style="list-style-type: none"> <li>• H4 employs 4 waged workers, of whom 3 have their own private livestock.</li> <li>• This herder will be significantly affected during the construction phase with the establishment of a safety construction zone (250m around WTGs and 30m on each side of internal access roads) where grazing will not be allowed for safety reasons.</li> <li>• However, he will be able to graze on this land during the operational phase though no structures can be established in the 250m WTG HPZ.</li> </ul>
6	H5	<b>5 workers:</b> H5W3, H5W4, H5W5, H5W6, H5W7	Access road WTG	Grazing	478	6.12	1.28	77.29	16.1	6.12	1.28	16.17	<ul style="list-style-type: none"> <li>• H5 employs 6 workers of whom 5 have their own private livestock.</li> <li>• This herder will be significantly affected during the construction phase with the establishment of a safety construction zone (250m around WTGs and 30m on each side of internal access roads) where grazing will not be allowed for safety reasons.</li> <li>• However, he will be able to graze on this land during the operational phase though no structures can be established in the 250m WTG HPZ.</li> </ul>
7	H6	<b>5 workers:</b> H6W1, H6W2, H6W5	OHTL Access road WTGs	Grazing	1,457	12.43	0.85	74.91	5.14	6.49	0.45	5.14	<ul style="list-style-type: none"> <li>• H6 employs 4 workers of whom 3 have their own private livestock.</li> </ul>

<sup>32</sup> The total land area used by the herders has been estimated based on the consultations undertaken. This is because there are no physical demarcations showing where each herder grazes.

No	PAP ID	WORKERS/OR OTHER HERDERS GRAZING THEIR OWN LIVESTOCK WITHIN THE SAME LAND	PROJECT COMPONENT	TYPE OF LAND USE	TOTAL LAND SIZE (HA <sup>32</sup> )	TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES		TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES + CONSTRUCTION SAFETY ZONE		PERMANENTLY AFFECTED LAND SIZE (HA)	SCALE OF IMPACT IN %	TOTAL % (CONSTRUCTION + OPERATION)	REMARK
						LAND SIZE (HA)	SCALE OF IMPACT IN %	LAND SIZE (HA)	SCALE OF IMPACT IN %				
													<ul style="list-style-type: none"> <li>The impact on the grazing land will come from the construction safety zone but they will be able to graze within this area after the construction phase.</li> </ul>
8	H7	n/a	OHTL Access road WTGs Substation Laydown area	Grazing	1,050	27.92	2.66	174.27	16.60	16.25	1.55	16.6	<ul style="list-style-type: none"> <li>This herder will be significantly affected during the construction phase with the establishment of a safety construction zone (250m around WTGs and 30m on each side of internal access roads) where grazing will not be allowed for safety reasons.</li> <li>In addition, the temporary laydown areas are found within H7 land. The land in these areas will be restored at the end of the construction phase.</li> </ul>
9	H8	3 workers: H8W4 H8W7, H8W9	Access road WTG	Grazing	752	3.90	0.52	38.09	5.07	3.90	0.52	5.07	<ul style="list-style-type: none"> <li>This herder has 8 waged workers, 3 of whom also own private livestock.</li> <li>The impact on this herder will be minor as there is only one WTG and access road within his grazing land. The grazing restrictions from the construction safety zone will be lifted during the operational phase.</li> </ul>
10	H9	7 workers: H9W1, H9W2	Access road WTG	Grazing	2,911	19.21	0.66	139.63	4.08	19.21	0.66	4.80	<ul style="list-style-type: none"> <li>H9, H10, H13 all have separate lease agreements for the land they use. H10 has a verbal agreement with H15 which allows him to graze on the land informally.</li> <li>H9 employs 2 waged workers who have their own private livestock. H10 employs 3 waged workers, and they all have their own private livestock.</li> <li>H13 employs 4 waged workers, of whom 3 have their own private livestock while H15 employs 4 waged workers, of whom 2 have their own private livestock.</li> <li>The impact on these herders and workers will be minor as there is only one WTG and access roads within their grazing land. The grazing restrictions from the construction safety zone will be lifted during the operational phase.</li> </ul>
11	H10	H10 workers: H10W1, H10W2, H10W3											
12	H13	H13 workers: H13W1 H13W2, H13W3											
13	H15	H15 workers: H15W3, H15W4											
14	H12	Other herders: H23/FR1 H12 workers: H12W1 H12W2, H12W3	Access road WTG	Grazing	941	6.38	0.68	95.90	10.19	6.38	0.68	10.19	<ul style="list-style-type: none"> <li>The herder and his workers will experience significant impact during the construction phase of the Project due to the establishment of the construction safety buffer zone (250m WTG and 30m on each side of access roads). However, this land will be available for grazing during the operational phase outside of the project footprint.</li> <li>The impact on H23/FR1 is considered insignificant because their ewes only graze on H12 land once a year in July. Additionally, they have access to more land outside of the Project boundaries which is leased under FR1 which they have confirmed is also suitable for the ewes.</li> </ul>
15	H14	n/a	Access road WTG	Grazing	1,942	6.69	0.36	97.80	5.04	6.96	0.36	5.04	<ul style="list-style-type: none"> <li>The impact on the grazing land will be mainly from the establishment of the construction safety zone restrictions around the WTGs and along the access roads.</li> </ul>

No	PAP ID	WORKERS/OR OTHER HERDERS GRAZING THEIR OWN LIVESTOCK WITHIN THE SAME LAND	PROJECT COMPONENT	TYPE OF LAND USE	TOTAL LAND SIZE (HA <sup>32</sup> )	TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES		TEMPORARILY AFFECTED DUE TO PROJECT FACILITIES + CONSTRUCTION SAFETY ZONE		PERMANENTLY AFFECTED LAND SIZE (HA)	SCALE OF IMPACT IN %	TOTAL % (CONSTRUCTION + OPERATION)	REMARK
						LAND SIZE (HA)	SCALE OF IMPACT IN %	LAND SIZE (HA)	SCALE OF IMPACT IN %				
													<ul style="list-style-type: none"> <li>However, grazing will be possible in areas outside of the Project footprint during the operation phase.</li> </ul>
16	H16	<b>H16 workers:</b> H16W1, H16W2 <b>7 worker:</b> H17W1	No project component	Grazing	2,068.75	0.00	0.00	0.97	0.05	0.00	0.00	0.05	<ul style="list-style-type: none"> <li>The impact on these herders and their workers will be from the establishment of a safety construction zone of 250m radius for the WTGs.</li> <li>However, there are no Project facilities located within their grazing land and therefore this impact is considered insignificant.</li> </ul>
17	H17												
18	H19	<b>H19 worker:</b> H19W1, H19W2	Access road WTG	Grazing	1,007	4.47	0.44	96.76	9.61	4.47	0.44	9.61	As above
19	H20	n/a	Access road	Grazing	390	1.98	0.51	13.87	3.56	1.98	0.51	3.56	<ul style="list-style-type: none"> <li>The impact on this land is considered minor and will be from the construction of an internal access road.</li> <li>All other land outside of the access road (and the 30m on each side safety buffer) will be available for grazing purposes during the construction and operation phase.</li> </ul>
20	H21	n/a	Access road WTG	Grazing	231	0.18	0.08	1.24	0.54	0.18	0.08	0.54	As above
21	H22												
22	H23	<b>H23 workers:</b> H23W1 H23W2	No project component	Grazing	937.4	0.00	0.00	0.65	0.07	0.00	0.00	0.07	<ul style="list-style-type: none"> <li>The only impact on this grazing land will be from the establishment of a 250m construction safety zone around a WTG.</li> <li>This is considered insignificant as FR1 still has more land outside of the Project boundaries. This land will remain accessible to H23 and his workers.</li> </ul>
23	FR1												
24	Galaba LLC	Leased to herders as provided above	WTGs & Access roads	Grazing	75,500	19.12	0.025	172.71	0.23	13.45	0.018	0.23	The impacted land is utilised by the herders who hold a lease with Galaba LLC.
25	Kokcha	Leased to herders as provided above	WTGs Access roads Laydown areas Sub-station	Grazing	160,000	119	0.07	1,128.3	0.71	101.4	0.06	0.71	The impacted land is utilised by the herders who hold a lease with Kokcha LLC.

**LEGEND**

	Indicates non-significantly affected PAPs
	Indicates significantly affected PAPs that will also be physically displaced.

Based on the table above, the construction of the Project facilities will significantly affect 4 herders (H4, H5, H7, and H12) and a total of 11 workers who own private livestock. The significant impact on these herders and workers is primarily due to the establishment of the construction safety zones: 250 m around the WTGs and 30 m on each side of the access roads. These restrictions will be lifted at the end of the construction phase, allowing grazing to resume in these areas during the operational phase.

The impact on other herders and workers with livestock is expected to be minor, as most of the grazing land will remain accessible throughout the construction and operation phase.

Given this, no replacement land is required for either significantly or non-significantly affected herders and their workers, as they will continue to have access to unaffected grazing areas within the Project site. However, they will receive targeted entitlements to mitigate any temporary or residual impacts, as detailed in the entitlements Chapter of this report.

### **9.2.2.1 Impacts on the LLCs**

As discussed in Section 5.2 above, Kokcha and Galaba LLCs hold grazing land lease agreements with the Veterinary Committee, and a portion of this land falls within the Project facilities. However, it is noted that Kokcha and Galaba LLCs do not directly undertake grazing activities. Instead, they enter into annual sub-lease and family-based contracts with herders who graze livestock within the Project Aol. The livestock owned by the LLCs is managed and grazed by herders under these annual family contracts.

Given the total land area leased to Kokcha LLC (160,000 ha) and Galaba LLC (75,500 ha), the anticipated impact of the Project on their ability to sub-lease land to herders, and on the herders' ability to graze the LLCs' livestock, is expected to be insignificant.

In addition, any impacts will be addressed in line with the entitlement matrix provided in this RAP. In addition, the EPC will be required to reinstate all temporarily affected land to its pre-project condition upon completion of construction activities.

### **9.2.2.2 Use of the Project site**

All herders and their workers have continued to access and use the Project site without interruption since the cut-off date. Herders seeking confirmation about renewing their annual land use agreements with the LLCs have been advised to proceed, as grazing will remain possible in unaffected areas even during the construction phase. Furthermore, none of the structures identified during the asset inventory have been affected.

Only H7 has experienced a minor impact on his grazing land because of the reptile relocation fencing installation, as outlined below.

Additionally, notification has been sent out to the PAPs with an update of the Project timeline.

### 9.2.3 Impact from the Reptile Relocation Fencing

To comply with both national and international lender requirements, ecological surveys were conducted within the Project footprint as part of the ESIA. During the Spring 2024 surveys, Central Asian tortoises were recorded within the Project footprint area, necessitating translocation to avoid impact during construction activities.

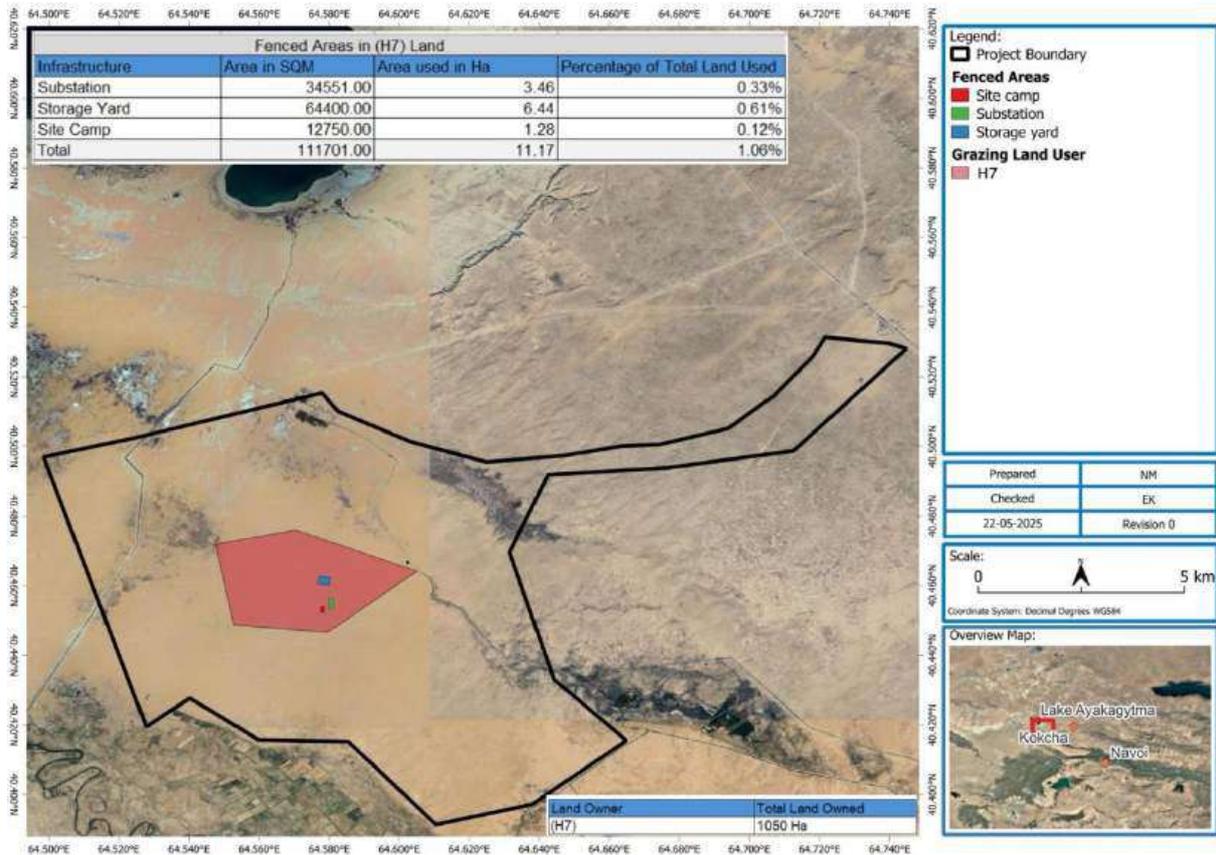
Given that these tortoises are only active for a limited period before entering hibernation (by going underground), the Project is required to translocate any individuals found within the substation, camp and storage areas. To prevent the tortoises from returning to these areas, a small mesh fence will be installed—approximately 60 cm above ground and 30 cm below ground (refer to example figures below). This activity was undertaken between 25 to 30 May 2025.

The fenced sub-station, storage and camp areas are located within grazing land used by H7. The fencing will only affect 11.7ha of the 1,050ha grazing area available to H7, and the remaining areas will continue to be accessible to him for grazing activities. Based on the information provided by H7 during the surveys, it was determined that he has approximately 200 sheep and 70 goats. As such, the impact from the tortoise fencing is not considered significant and he will still have access to the GRM.

As this fencing is being undertaken before the disclosure and payment of compensation entitlements, H7 signed a consent letter allowing the fencing to be undertaken. The key elements of this consent letter include:

- A confirmation from the PAP that they understand the scope of the fencing requirements.
- A confirmation that H7 grants their permission to the Project Company to commence the erection of the tortoise fencing before the disclosure and payment of compensation entitlements, the dates of which will be communicated by July 2025.
- A commitment from the Project Company to pay compensation owed to H7 before the start of construction phase.
- A commitment from the Project Company that no further land restrictions (beyond the tortoise fencing) will commence on the herder's land until compensation amounts have been disclosed, paid, and verified.

The consent letter was signed on 28<sup>th</sup> May 2025 based on the availability of the herder in the presence of a Project representative, herder, and a witness. In addition, the herder was provided with a signed copy for their records.



**Figure 9-2 Location of the tortoise fencing on H7 grazing land**

### 9.2.4 Impact on the Fishpond

H10 owns a fishpond located along the canal that runs through the proposed Project site, approximately 1.2 km from the nearest wind turbine (WTG BSH2-11). Therefore, no disruption to the pond itself is anticipated. However, the herder's structures adjacent to the pond (H10a) are expected to be affected by shadow flicker, including the area surrounding the fishpond. The accommodation house will be modified to allow the herder and his workers to remain in the area and continue fish farming. As such, the income generated from the fish farming will not be impacted. During the operational phase, monitoring will be carried out to assess whether shadow flicker has any effect on fish production and to determine if any corrective measures are necessary.

## 9.3 Loss of Employment

Out of the 23 herders using the Project site, only two (H22 and H24) do not employ any workers. The remaining 21 herders employ a total of 67 permanent workers. Of these, 39 workers also graze their own livestock on the site alongside their employer's animals. The impacts on these workers with livestock have been assessed in the section above.

Of the 67 permanent workers, nine are relatives of the herders, with the remaining 58 engaged through informal employment arrangements. Among the nine next of kin, two provide unpaid labour, while the rest receive payment for their work. Of the 58 non-related workers, five do not earn a salary but are permitted to graze their own livestock on the herder's grazing land as part of their informal agreement (refer to Table 9-4 for more details). None of the workers have formal written contracts with their employers.

In addition, five herders (H2, H10, H12, H16, and H17) hire seasonal workers during peak periods such as lambing and shearing seasons. The number of seasonal workers varies from year to year based on need but the herders approximated this to be 118 in the last season. Seasonal workers are primarily paid daily, while all permanent workers are paid in cash either daily or monthly. Most workers operate on a rotational schedule, typically working 15-day shifts per month.

It is not anticipated that any of the permanent and/or seasonal workers will lose their employment due to the Project's land acquisition, as grazing activities will remain possible outside the Project footprint and safety zones. Furthermore, herders have confirmed that no workers will be laid off. However, in the event of job losses due to temporary disruptions during the Project construction, specific compensation measures are included in the entitlement matrix to address potential income losses.

## 9.4 PAPs Previously Impacted by the Bash WF

The Project is in the vicinity of two other Wind Farm Projects that are expected to be operational at the time of constructing the Project. These are Bash 500 MW and Bash 52 MW Wind Farms. These two WFs are located within the same area to the north of the proposed site. In addition, the Bash 500 MW OHTL crosses the Wind Farm Project site.

Four herders, including H3 (coded as H5 in Bash), H10 (coded as H3 in Bash), H13 (coded as H1 in Bash), and H15 (coded as H2 in Bash), were affected by the Bash 500 MW project. Eight workers (H3W2, H3W3, H3W5, H15W1, H15W2, H15W3, H15W4, and H21W1) who previously worked at the Bash 500 MW project and who have subsequently moved to the current project site may be affected by temporary economic displacement. However, as noted above, it is not anticipated that any waged or next-of-kin workers will lose their employment due to the project's land acquisition. Should this happen due to temporary disruptions during operations, specific measures are included in the entitlement matrix to compensate for income losses.

None of the herders or workers impacted by the Bash 500MW WF will be significantly affected by the proposed Project.

The PAPs affected by the Bash 500MW WF confirmed that they had received compensation under the Bash Project, including participation in livelihood programs, and were aware of the GRM. Among the 4 herders, only H3 reported that the land acquisition had led to a reduction

in the size of his livestock herd. Based on this feedback, his concerns were raised with the Bash 500MW WF CLO who undertook consultations with him on 27<sup>th</sup> May 2025. Based on the consultations, the herder stated that he did not have concerns about Bash 500MW WF and that his livestock had increased over the years after being impacted by Bash 500MW.

It is noted that some of the herders affected by the Bash 500MW Project expressed interest in knowing when they could return to the site, as construction had been completed. In response, the Bash 500MW WF Project CLO organized a meeting on 23<sup>rd</sup> May 2025 to provide clarification on site access, discuss safety considerations, and inform the herders of any remaining restrictions in relation to the established HPZ.

Based on the MoM provided by the CLO, the following information was provided:

- The herders (and local communities) can commence the use of the Bash 500MW WF site from June 2025.
- Those who return to the site will have to observe safety precautions (including for their livestock) when crossing the project's internal access roads.
- No structures can be built within the 1km established HPZ around the WTGs but grazing in this area is allowed. Areas near the sub-station and camp areas should also be avoided due to safety requirements.

**Note:** The Bash 500MW and Bash 52MW WF Projects undertook the assessment of the land acquisition impacts and established the applicable entitlements for the above PAPs in the Project specific RAP which was approved by the lenders.

## 9.5 Local Access Road

There are several vehicle tracks within the proposed Project site that are currently used by herders, their workers, and residents of Koklam village. The main access road, which connects Koklam village to Shorfikon district, is also used by herders and their workers to reach the Project site. This same road will serve as the primary route for Project vehicles during both the construction and operational phases.

While herders, workers, and residents from Koklam will continue to have access to the main access road going through the site, they may experience some disruptions during the road's upgrading and during delivery of heavy and wide Project components. For safety reasons, herders and their workers will not be permitted to use the internal access roads constructed to reach the WTG construction areas and other Project facilities.

It is important to note that many of the existing vehicle tracks will remain unimpacted by the Project and will continue to be available for use by the PAPs and other road users.

To minimize disruptions, the EPC Contractor will develop a Traffic and Transport Management Plan. This plan will outline the traffic management approach for both the main and internal

access roads, include notification protocols to inform existing users of any expected disruptions or safety measures, and describe awareness-raising activities. The plan will be prepared and approved by the lenders prior to the start of the construction phase and before impact on the local access road.

## 9.6 Gas Pipeline

The Uztransgaz pipeline corridor traverses the site north to south and extends around 450 m to the nearest WTG. Additionally, there is an access road that passes over this gas pipeline at some point. As such, there is potential for the construction of the access road and Project heavy machinery and vehicles to damage this pipeline or disrupt the supply if proper measures are not put in place.

Based on consultations undertaken with Uztransgaz, the Project will be required to obtain technical conditions before the construction of the access road and heavy equipment can cross over its gas pipeline. As such, further consultations will be undertaken with by the Project Company to ensure that these conditions are determined and implemented.

## 9.7 Impact on Forestry land

Consultations held with the Forestry Departments in Gijduvon and Shofirkon districts confirmed that forestry land within the Project area is classified as either forest or pasture. Based on the current Project footprint, only pastureland—comprising shrubs and other vegetation—will be affected. No trees will be impacted.

These discussions further indicated that the loss of shrubs and vegetation will require compensation. Accordingly, a site visit was carried out in November 2025 by the Forestry Department and ACWA Power, during which an inventory was conducted. In addition, the Forestry Department requested further information from ACWA Power to enable the calculation of compensation for the affected forestry land. According to ACWA Power the requested information is currently being processed.

## 9.8 Summary of Physical & Economic Displacement Impacts

The table below provides an overview of the key physical and economic impacts on the PAPs who use the Project site.

**Table 9-5 Summary of physical & economic impacts**

NO	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
1	<b>H1</b>		■	-	-	-	■	-	-	-
	H1W1	Waged labour	-	■	-	-	■	-	-	-
	H1W2	Waged Labour	-	-	-	-	-	-	-	-
	H1W3	Waged Labour	-	■	-	-	■	-	-	-
	H1W4	Waged Labour	-	-	-	-	-	-	-	-
	H1W5	No salary based on the agreement to graze private livestock on site	-	■	-	-	■	-	-	-
2	<b>H2</b>		■	-	-	-	■	-	-	-
	H2W1	Waged labour	-	-	-	-	-	-	-	-
	H2W2	Waged labour	-	■	-	-	■	-	-	-
	H2W3	Waged labour	-	-	-	-	-	-	-	-
3	<b>H3</b>		■	-	-	■	■	■	■	■
	H3W1	Waged labour								
	H3W2	No salary based on the agreement to graze private livestock on site	-	■	-	-	■	-	-	■
	H3W3	Unpaid labour Next of kin	-	-	-	-	-	-	-	■
	H3W4	Waged labour	-	-	-	-	-	-	-	-

No	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
	H3W5	Waged labour	-	--	-	-	-	-	-	■
	H3W6	Waged labour	-	-	-	-	-	-	-	-
4	<b>H4</b>		■	-	■	-	■	■	-	-
	H4W1	Waged labour	-	■	-	-	■	-	-	-
	H4W2	Waged labour	-	■	-	-	■	-	-	-
	H4W3	Waged labour	-	■	-	-	■	-	-	-
	H4W4	Waged labour (Next of kin)	-	-	-	-	-	-	-	-
5	<b>H5</b>		■	-	■	-	■	■	-	-
	H5W2	Waged labour (Next of kin)	-	-	-	-	-	-	-	-
	H5W3	Waged labour	-	■	-	-	■	-	-	-
	H5W4	Waged labour	-	■	-	-	■	-	-	-
	H5W5	Waged labour	-	■	-	-	■	-	-	-
	H5W6	Waged labour	-	■	-	-	■	-	-	-
	H5W7	Waged labour	-	■	-	-	■	-	-	-
6	<b>H6</b>		■	-	-	■	■	-	■	-
	H6W1	Waged labour	-	■	-	-	■	-	■	-
	H6W2	Waged labour	-	■	-	-	■	-	■	-
	H6W4	Waged labour (Next of kin)	-	-	-	-	-	-	-	-

NO	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
	H6W5	Waged labour	-	■	-	-	■	-	■	
7	<b>H7</b>		■	-	■	-	■	■	-	-
	H7W1	Waged labour (Next of kin)	-	-	-	-	-	-	-	-
8	<b>H8</b>		■	-	-	■	■	-	■	-
	H8W2	Waged labour	-	-	-	-	-	-	-	-
	H8W3	Waged labour	-	-	-	-	-	-	-	-
	H8W4	Waged labour	-	■	-	-	■	-	-	-
	H8W5	Waged labour	-	-	-	-	-	-	-	-
	H8W6	Waged labour	-	-	-	-	-	-	-	-
	H8W7	Waged labour	-	■	-	-	■	-	-	-
	H8W8	Waged labour	-	-	-	-	-	-	-	-
	H8W9	Waged labour	-	■	-	-	■	-	-	-
9	<b>H9</b>		■	-	-	-	■	-	-	-
	H9W1	Waged labour	-	■	-	-	■	-	-	-
	H9W2	Waged labour	-	■	-	-	■	-	-	-
10	<b>H10</b>		■	-	■ <sup>33</sup>	-	■	■	-	■
	H10W1	No salary based on the agreement	-	-	-	-	-	-	-	-

33 H10's structure affected by noise shadow and flicker is partially demolished and not in use.

NO	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
		to graze private livestock on site								
	H10W2	Waged labour	-		-	-		-	-	-
	H10W3	Waged labour	-		-	-		-	-	-
11	<b>H12</b>		■	-	■	-	■	■	-	
	H12W1	Waged labour	-	■	-	-	■	-	-	-
	H12W2	Waged labour	-	■	-	-	■	-	-	-
	H12W3	Waged labour	-	■	-	-	■	-	-	-
12	<b>H13</b>		■	-	-	-	■	-	-	■
	H13W1	Waged labour	-	■	-	-	■	-	-	-
	H13W2	Waged labour	-	■	-	-	■	-	-	-
	H13W3	Waged labour	-	■	-	-	■	-	-	-
	H13W4	Waged labour	-	-	-	-	-	-	-	-
13	<b>H14</b>		■	-	■	-	■	■	-	-
	H14W1	Unpaid labour (Next of kin)	-	-	-	-	-	-	-	-
	H14W2	Waged labour	-	-	-	-	-	-	-	-
	H14W3	Waged labour	-	-	-	-	-	-	-	-
14	<b>H15</b>		■	-	-	-	■	-	-	■
	H15W1	Waged labour	-							■
	H15W2	Waged labour	-							■

No	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
	H15W3	No salary based on the agreement to graze private livestock on site	-	■	-	-	■	-	-	■
	H15W4	Waged labour	-	■	-	-	■	-	-	■
15	<b>H16</b>		■	-	-	-	■	-	-	-
	H16W1	Waged labour	-	■	-	-	■	-	-	-
	H16W2	Waged labour	-	■	-	-	■	-	-	-
16	<b>H17</b>		■	-	-	-	■	-	-	-
	H17W1	Waged labour	-	■	-	-	■	-	-	-
	H17W2	Waged labour	-	-	-	-	-	-	-	-
17	<b>H19</b>		■	-	-	-	■	-	-	-
	H19W1	No salary based on the agreement to graze private livestock on site	-	■	-	-	■	-	-	-
	H19W2	Waged labour	-	■	-	-	■	-	-	-
18	<b>H20</b>		■	-	-	-	■	-	-	-
	H20W1	Waged labour (Next of kin)	-	-	-	-	-	-	-	-
19	<b>H21</b>		■	-	-	-	■	-	-	-
	H21W1	Waged labour (Next of kin)	-	-	-	-	-	-	-	■

NO	HERDER/WORKER CODES	RELATION TO EMPLOYER	TYPE OF IMPACT				ECONOMIC IMPACT	PHYSICAL IMPACT	MODIFICATION OF STRUCTURES DUE TO SHADOW FLICKER	IMPACT FROM BASH WF
			GRAZING LAND (HERDER)	GRAZING LAND (WORKER WITH LIVESTOCK)	NOISE & SHADOW FLICKER	SHADOW FLICKER ONLY				
20	<b>H22</b>		■	-	-	-	■	-	-	-
	<b>H23</b>		■	-	-	-	■	-	-	-
21	H23W1	Waged labour	-	■	-	-	■	-	-	-
	H23W2	Waged labour	-	■	-	-	■	-	-	-
	H23W3	Waged labour (Next of kin)	-	-	-	-	-	-	-	-
22	<b>FR1</b>		■	-	-	-	■	-	-	-
23	<b>H24</b>		■	-	-	-	■	-	-	-
24	<b>Galaba LLC</b>	Leases land to herders	■	-	-	-	■	-	-	■
25	<b>Kokcha LLC</b>	Leases land to herders	■	-	-	-	■	-	-	-

### Legend

■	Significant impact
■	Impact is considered insignificant or minor

In conclusion, five herders — H4, H5, H7, H12, and H14 — are expected to experience significant impacts due to physical displacement caused by noise. Apart from H14, these herders and their workers will also face grazing land impacts of 10% or more during the construction phase. In total, these five herders employ 17<sup>34</sup> workers. These PAPs will receive compensation and transitional support as detailed in Chapter 10 below. Of the 17 workers, four share the same household as the herders. These include H4 and H4W4, H5 and H5W2, H7 and H7W1, as well as H14 and H14W1, who are from the same households.

Additionally, seven herders and a total of 26 workers are expected to be affected by shadow & flicker. These include H3 (who shares accommodation with H24), H6, H8, H10 (who shares with H11), and H12(a). Among the seven herders, four — H3, H8, H10, and H12 — are the actual owners of the affected structures. This impact will be mitigated by modifying the orientation of windows and doors (with the support of a Project engineer) to face away from the wind turbines with monitoring during the operation phase.

All the other remaining herders are expected to experience minor or negligible impacts, which will be addressed through the entitlements outlined below.

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<sup>34</sup> Workers who will be significantly affected include H4W1, H4W2, H4W3, H4W4, H5W2, H5W3, H5W4, H5W5, H5W6, H5W7, H7W1, H12W1, H12W2, H12W3, H14W1, H14W2, H14W3.

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## 10 ENTITLEMENTS

The footprint of the Project will trigger the following forms of physical and economic displacement:

- Economic displacement of herders and workers with livestock due to:
  - Temporary land use restrictions during construction.
  - Permanent land take based on the footprint of the Project.
- Physical displacement due to impacts from noise & shadow flicker.

Pursuant to national legislation and DFI performance requirements relating to land access and economic displacement, the Project Developer will ensure the implementation of mitigation and offset measures to abate the impacts. These measures can be categorized as follows:

- **Compensation** for loss of privately held physical assets and legally recognized income streams, for the re-instatement of pre-project livelihood statuses.
- **Livelihood restoration initiatives**, for the re-instatement or enhancement of pre-project livelihood statuses, in addition to, or in the absence of, compensation.
- **Transitional support**, for short-term mitigation against immediate losses associated with displacement.

The entitlements matrix below sets out the eligibility criteria for specific measures constituting the overarching compensation, livelihood restoration initiatives and transitional support measures.

**Table 10-1 Entitlement matrix**

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
1.	Grazing land	<p><b>Permanent loss of access to grazing land due to the development of the project</b></p> <p><b>Temporary loss of access to pastoral land, and associated income losses</b></p>	<p>Formal land users with formal agreements losing 10%<sup>35</sup> or more of their land access</p>	<p><b><u>Compensation and long-term sustainable solution</u></b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> Replacement land, equivalent quality selected by a PAP, with secured tenure. This will include all related fees in relation to the replacement land.</li> <li>- <b>Option 2:</b> If replacement land is not available prior to displacement, monetary compensation will be provided, based on the average lease prices for similar grazing land in Bukhara district.</li> </ul> <p><b><u>Transitional support</u></b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> Provision of fodder crop support for the duration of the construction period or until a long-term sustainable solution is secured.</li> <li>- <b>Option 2:</b> Monetary compensation to PAPs to purchase fodder crops for the duration of the construction period or until a long-term sustainable solution is secured.</li> <li>- <b>Option 3:</b> Facilitate and support in the process of securing temporary land (where available).</li> </ul> <p><b><u>Livelihood Restoration (LR) initiatives</u></b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b><u>Additional requirements and support:</u></b></p> <ul style="list-style-type: none"> <li>- Compensation of accidental livestock losses due to traffic impact resulting from the project based on prevailing market prices.</li> <li>- Provision of a written notice to vacate the land signed by a PAP, three (3) months prior to the site handover by a PAP. The notice period will also consider the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Facilitation of alternative land access and safety if necessary.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> <li>- Facilitate and support in the process of updating relevant lease agreements including the payment of associated fees and taxes. Any administrative costs incurred in the process and residual costs/price differential will be covered by the Project.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of land based on the new grazing regulations (including legal and taxpayment protocols, opportunities).</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs prior to impact.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- On-going meaningful engagement with the PAPs and regular monitoring of impacts throughout the process</li> </ul>	Triggered
			<p>Formal land users with formal agreements losing less than 10% of their land access.</p>	<p><b><u>Compensation and temporary support solution</u></b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> Provision of fodder crop support and post-construction land restoration until equivalent grazing capacity is restored.</li> <li>- <b>Option 2:</b> Monetary compensation to PAPs to purchase fodder for the duration of the construction period or until an alternative grazing land is secured.</li> <li>- <b>Option 3:</b> Facilitate and support in the process of securing temporary land (where available).</li> </ul>	Triggered

<sup>35</sup> In accordance with the lenders' requirements, these PAPs are significantly affected as 10% of more of their productive asset will be affected by the project.

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				<p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Compensation of accidental livestock losses due to traffic impact resulting from the project based on prevailing market prices.</li> <li>- Provision of a written notice to vacate the land signed by a PAP, three (3) months prior to the site handover by a PAP. The notice period will also consider the herders' breeding season to avoid disruption of breeding activities.</li> <li>- If applicable, disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Facilitation of alternative land access and safety if necessary.</li> <li>- Support in post-construction land restoration to grazing quality.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of land based on the new grazing regulations (including legal and taxpayment protocols, opportunities).</li> <li>- On-going meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	
			<p>Informal land users (livestock owners including workers with livestock) without formal agreement</p>	<p><b>Compensation</b></p> <ul style="list-style-type: none"> <li>- In line with the IFI requirements, informal land users are entitled to access the following supports for restoration of their livelihood losses due to restricted access to pasture lands.</li> </ul> <p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> Provision of fodder crop for the duration of the construction period or until an alternative grazing land is secured.</li> <li>- <b>Option 2:</b> Monetary compensation to PAPs to purchase fodder crops for the duration of the construction period or until an alternative grazing land is secured.</li> <li>- <b>Option 3:</b> Facilitate and support in the process of securing temporary land (where available).</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Compensation of accidental livestock losses due to traffic impact resulting from the project based on prevailing market prices.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> <li>- Provision of a written notice to vacate the land signed by a PAP, three (3) months prior to the site handover by a PAP. The notice period will also consider the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Facilitation of alternative land access and safety if necessary.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs prior to impact.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of land based on the new grazing regulations (including legal and taxpayment protocols, opportunities).</li> </ul>	<p><b>Triggered</b></p>

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				<ul style="list-style-type: none"> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- On-going meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	
2	Built assets	Loss of immovable built assets and associated income losses (residential)	Accommodation structures owners (formal and informal)	<p><b>Compensation</b></p> <ul style="list-style-type: none"> <li>- Monetary compensation for loss of built assets (structures) at full replacement cost based on the current price of building materials within local markets.</li> </ul> <p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> interim accommodation allowance of up to three months, with an option to extend up to 6 months if justified.</li> <li>- <b>Option 2:</b> Interim equivalent accommodation of up to three months with an option to extend up to 6 months if justified.</li> <li>- Disruption allowance of 5% of the total compensation (at full replacement cost) for assets, or reimbursement of demolition, and moving expenses for relocation of structures, if the disruption allowance is overrun (with proof of payment).</li> <li>- Eligibility for vulnerable support.</li> <li>- Asset owners will be allowed to salvage valuable materials from demolished structures.</li> <li>- Support in ensuring decent living conditions.</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Provision of a written notice signed by a PAP, three (3) months and one month prior to notice to vacate. The notice period will also consider the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Delivery of monetary compensation at full replacement value prior to displacement.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of property in local real estate markets (including legal and taxpayment protocols) - optional.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	Triggered
		Resettlement of movable residential structures (trailers)	Movable accommodation structures owners (formal and informal)	<p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- Reimbursement of fuel required to move the trailer(s) to a location chosen by a PAP within the Project area.</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p>	Triggered

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				<ul style="list-style-type: none"> <li>- Provision of a written notice signed by a PAP, three (3) months and one month prior to notice to vacate. The notice period will also take into account the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project. This will also include female members and the youth in the households.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Delivery of monetary compensation at full replacement value prior to displacement.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of property in local real estate markets (including legal and taxpayment protocols) - optional.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	
		<b>Loss of immovable built assets (non-residential)</b>	All asset owners (formal and informal)	<p><b>Compensation</b></p> <ul style="list-style-type: none"> <li>- Monetary compensation for loss of built assets (structures) at full replacement cost based on the current price of building materials within local markets.</li> </ul> <p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- An allowance amounting to 5% of the compensation for replacement of immovable built assets. This will cover the dismantling, salvaging materials.</li> <li>- Documented (proven) expenses for the reconstruction of project-affected assets (i.e., construction labour, reconnection charges) will be reimbursed.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Provision of a written notification notice signed by a PAP, three (3) months and one month prior to site handover by a PAP. The notice period will also take into account the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Delivery of monetary compensation at full replacement value prior to impact.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of property in local real estate markets (including legal and taxpayment protocols) - optional.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	<b>Triggered</b>
		<b>Relocation of movable assets (i.e., livestock equipment, pumps etc)</b>	All asset owners (formal and informal)	<p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- An Allowance of 5% of the full replacement cost of the movable assets to cover their relocation costs.</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p>	<b>Triggered</b>

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				<ul style="list-style-type: none"> <li>- Provision of a written notice to vacate the land signed by the PAP, three months prior to the site handover. The notice period will also take into account the herders' breeding season to avoid disruption of breeding activities.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> <li>- Orientation workshop to familiarize PAPs with procedures for the acquisition and registration of property in local real estate markets (including legal and taxpayment protocols) - optional.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs.</li> <li>- Access to the Project's GRM, including assistance accessing judicial forms of remedy if required.</li> <li>- On-going meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.</li> </ul>	
3	Built assets	Impact from shadow flicker on accommodation structures	All asset owners (formal and informal)	<p><b>Compensation</b></p> <ul style="list-style-type: none"> <li>- <b>Option 1:</b> Modification of the affected accommodation structures affected by shadow &amp; flicker by the Project.</li> <li>- <b>Option 2:</b> Monetary compensation to the PAP for modifying affected accommodation structures based on the current price of building materials within local markets.</li> <li>- If it is determined that safe modification of the structures is not feasible, compensation will be provided at full replacement cost, along with transitional support, in accordance with the provisions outlined above.</li> <li>- Engineering support to the PAP during the modification of the affected structures.</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Provision of notice to affected PAPs, 6 months before the start of the commissioning phase.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the workers and regular monitoring of impacts throughout the process.</li> </ul>	Triggered
4	Income	Loss of employment and associated income streams	Workers employed by the herders	<p><b>Compensation</b></p> <ul style="list-style-type: none"> <li>- Not applicable</li> </ul> <p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- Monthly severance allowance equalling the Uzbekistan minimum wage<sup>36</sup>, or the PAP's current salary (whichever is higher), for a transitional period of six (6) months, or for the period of disruption in case of a temporary impact on an employer.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> </ul>	Not <sup>37</sup> Triggered

<sup>36</sup> The minimum wage in Uzbekistan is UZS 1,155,000 based on the Presidential Decree No. UP-108, issued on August 12, 2024.

<sup>37</sup> Consultations with herders employing workers confirmed that no job losses are currently expected. However, if future monitoring identifies job losses resulting from project impacts, this entitlement will become active.

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				<p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Provision of notice to affected workers, 3 months in advance of the termination or suspension of their contract/work.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the workers and regular monitoring of impacts throughout the process.</li> </ul>	
5	Support to significantly affected PAPs	Impact on more than 10% of land used by the PAPs	All significantly impacted PAPs	<ul style="list-style-type: none"> <li>- One time support to significantly impacted PAPs to include the basic calculations value<sup>38</sup> as per the Presidential Decree No 108, issued on August 12, 2024, X 2.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> </ul>	Triggered
6	Support for vulnerable PAPs	Impact on livelihoods resulting from the land take and land use restrictions	All vulnerable project-affected households identified prior to or during project implementation.	<p><b>Transitional support</b></p> <ul style="list-style-type: none"> <li>- One off subsistence allowance based on one month of the minimum wage in Uzbekistan.</li> <li>- Administrative assistance for enrolment in suitable State welfare programs within the PAPs communities.</li> <li>- Priority consideration for project recruitment will be given to the PAHs, subject to meeting the health and skills requirements necessary for the project.</li> </ul> <p><b>Livelihood Restoration (LR) initiatives</b></p> <ul style="list-style-type: none"> <li>- All the PAPs will be eligible for the LR initiatives as described in section 10.1 and the detailed livelihood restoration program.</li> </ul> <p><b>Additional requirements and support</b></p> <ul style="list-style-type: none"> <li>- Continuous monitoring of changes to vulnerability of PAPs.</li> <li>- Opening of bank accounts for PAPs that do not have a bank account.</li> <li>- Disbursement of monetary compensation, including applicable taxes, to the registered bank accounts of PAPs prior to impact.</li> <li>- Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals.</li> <li>- Ongoing meaningful engagement with the vulnerable people and regular monitoring of impacts throughout the process</li> </ul>	Triggered
7	All applicable	All applicable	Absentee project-affected households (leaseholder, user permit holder, or informal land user)	<ul style="list-style-type: none"> <li>- Assets for which the owner/s cannot be located shall be surveyed, and the value of the total compensation package (monetary and in-kind) calculated and placed within a third-party escrow account where funds are held in trust for a period of 2 years. After a 2-year period has elapsed without an asset owner making a claim, the funds will be disbursed to community development activities targeting the respective community, based on needs as determined in consultation with the local government authority and affected community at the time of disbursement.</li> </ul>	Not Triggered

<sup>38</sup> The Presidential Decree No 108, issued on August 12, 2024, sets the basic calculation value at UZS 375,000 which is used to calculate different allowances.

No.	LIVELIHOOD ASSET OR RESOURCE	LIVELIHOOD IMPACT	PAP CATEGORY	ENTITLEMENTS FOR IMPACT MITIGATION	APPLICABILITY
				- Alternatively, the compensation will be paid to the government of Uzbekistan, and future claims will be referred to the government. Should the asset owner make a claim before the 2-year period, and be able to furnish proof of asset ownership, the owner will be compensated.	
8	Forestry land	Impacts on shrubs & vegetation	Forestry Department in Gijduvon & Shorfikon	- Monetary compensation based on the determined disruption of the shrubs & vegetation. <b>Additional requirements and support</b> - Post-construction land restoration.	Triggered
9	Infrastructure	Impact on existing gas pipeline	Uztransgaz	- Project to obtain technical conditions from Uztransgaz before construction of the access road and transportation or machinery can cross over any of their pipeline located within the site.	Triggered
10	Infrastructure	Impact on access road	Koklam village & PAPs using the site	- Implementation of a Traffic & Transport Management Plan - Safety awareness campaigns for the local community & PAPs using the Project site.	Triggered
11	Land	Land fragmentation, unviable land & associated assets	All the impacted landowners and users	- Unaffected portions of an unaffected grazing land will also be compensated if the same becomes unviable after impact. - Assets within the unaffected grazing land will also be compensated at full replacement cost if the land becomes unviable. - Facilitation of alternative access to land and safety if necessary. - Facilitation of free access to non-judicial (including project GRM) and judicial system (i.e., court of law) for complaints and appeals. - On-going meaningful engagement with the PAPs and regular monitoring of impacts throughout the process.	Not triggered

## 10.1 Livelihood Restoration Programs

In addition to monetary compensation, all PAPs will be entitled to livelihood restoration measures. These measures will be implemented to ensure that the livelihoods of PAPs are improved, or at least restored to pre-project levels, and that no affected person is left worse off because of project development.

As discussed in Chapter 9, only five herders and their 17 workers are expected to be significantly affected by the Project—either due to the loss of 10% or more of their access to grazing land or because of physical displacement caused by noise and shadow flicker impacts. Most herders and their workers, however, will not face significant impacts and will have access to their existing grazing areas, albeit with some disruptions especially during the construction phase.

Consultations conducted with herders, workers, and their spouses regarding preferred livelihood restoration measures revealed that most expressed a preference for receiving cash allowances. These allowances were intended to support household needs, medical expenses, education, home renovations and support in starting new businesses.

Although the purpose of livelihood restoration programs was clearly explained during the consultations, the preference for direct cash support suggests an immediate need among the PAPs to supplement household income. This highlights the importance of the Project adopting a more sustainable approach aimed at enhancing income through existing livelihood activities, thereby ensuring long-term benefit for the PAPs.

In recognition that all herders and workers will retain access to their grazing land outside the designated construction zones, and in continued consultation with the PAPs, the Project will implement the following livelihood support programs.

### 10.1.1 Training on the new Pastural land Law & Opportunities for PAPs

As outlined in section 3.1.7 of this report, Presidential Decree UP-15 on "Measures to Introduce Modern Mechanisms for the Protection and Rational Use of Pastures" came into effect in January 2025. The Decree mandates the dissolution of the SWID Committee and the establishment of a new authority, the Veterinary and Livestock Development Committee, to oversee pastureland management in Uzbekistan.

In line with these changes, Article 7 of the Decree requires the Veterinary Committee, in collaboration with the Ministry of Digital Technologies and the Ministry of Agriculture, to launch an electronic platform, "*E-yaylov*," by December 2025. This platform aims to support more efficient use of pastures.

Once operational, the *E-yaylov* platform will allow herders and workers to apply for land directly through the platform, eliminating the need for annual agreements with government

clusters. Although implementation details are still being finalized, the platform is expected to offer a broader view of available land within and beyond the Project area, with the potential for longer-term lease agreements than those currently in place.

To support this transition and raise awareness among herders and their workers, the Project will coordinate training sessions in collaboration with the Bukhara Pasture Management Department.

The first session will introduce the new legal provisions and expected reforms, while the second will be held after the *E-yaylov* platform is launched to train the PAPs on how to use it and its benefit.

### 10.1.2 Animal Health & Disease Control Program

A livestock expert will be engaged by the Project to conduct a feasibility study on the most effective way to implement a program focused on animal health and disease control.

**Table 10-2 Animal health & disease control program**

OBJECTIVE	ACTIVITIES	ADVANTAGES	DISADVANTAGES	PROVEN IMPROVEMENTS IN YIELDS	LIMITATIONS	FEASIBILITY	BUDGET ESTIMATE PER UNIT (USD)
To reduce livestock mortality and improve health.	Provide regular veterinary check-ups, vaccination programs, establish disease surveillance systems.	Reduced mortality rates, improved animal health and productivity, early disease detection and control.	Requires continuous veterinary services and disease surveillance, potential resistance to vaccination programs.	20-30% reduction in mortality rates, effective for small to large-scale herds.	Success depends on continuous veterinary services and herder/worker cooperation.	Low to moderate cost with significant health improvements; requires ongoing veterinary support.	\$800 - \$1,200 per herder/worker

Additionally, the feasibility study will assess opportunities for PAPs to add value and improve the quality of their products, such as enhancing wool quality, providing training on milk handling, and offering basic processing skills like cheese or dried meat production. It is recognized that female household members have limited involvement in herding activities, as they reside primarily in homes outside the project site. Nevertheless, the Livestock Expert will consult with these women to identify which activities they are interested in, and the programs will be tailored accordingly to address their specific needs.

The feasibility surveys will be undertaken in close coordination with the stakeholders below to determine the most viable value addition option.

**Table 10-3 Potential organisations to be considered**

NAME	LOCATION	AREA OF WORK
Veterinary and Livestock Development Committee Kokcha LLC Galaba LLC	Bukhara region	Livestock
Inspection of Control over the Agro-Industrial Complex under the Cabinet of Ministers of the republic of Uzbekistan (Bukhara region)	Bukhara region Phone: 223-06-66 Email: <a href="mailto:infobuxoro@agroin.uz">infobuxoro@agroin.uz</a>	Animal breeding & other agricultural activities
Bukhoro Agrocluster	312 Dilkusho str. Bukhara city, 2001033 Phone: (0365) 221-22-86 Email: <a href="mailto:info@agroklastar.uz">info@agroklastar.uz</a>	Focused on value addition of agricultural products.
UNICHRONE	Email: <a href="mailto:support@unichrone.com">support@unichrone.com</a>	Training on food hygiene & safety

To initiate the feasibility study, the Project Company RAP implementation team will undertake the following steps:

- Develop the Terms of Reference for the Livestock Expert and submit it to the lenders for their review.
- Identify and shortlist qualified Livestock Experts and share their profiles and proposals with the lenders for their review and input.
- Commission the feasibility study to evaluate the most appropriate livelihood program(s).
- Submit the outcome of the feasibility study including the implementation timeline, budgets and the KPIs to the lenders.
- Implement the selected livelihood programs in coordination with the Livestock Expert and the identified stakeholders.

### 10.1.3 Preferential Recruitment of PAPs

All the PAHs will be informed about the employment opportunities during the construction and operation phase and their applications prioritized subject to meeting the health and skills requirements necessary for the project. The selected members will be provided with pre-employment training by the Project Company based on the jobs available.

It is noted that where vulnerable people are unable to work (i.e., due to age, disability or illness) a member of their household will be considered.

## 10.2 Compensation Payments

Monetary compensation and transitional support packages will be disbursed by bank transfer to the registered bank accounts of PAPs prior to impact. Additionally, income tax and any

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other charges applicable to the transfer of compensation funds to the PAPs will be settled in full, at the time of the compensation disbursement. The Project will assist PAPs who do not have bank accounts in opening them.

All financial records pertaining to compensation payments (i.e., payment slips) will be archived for the purposes of internal monitoring and audits discussed Chapter 14 of this Plan. Any grievances or claims related to outstanding compensation payments will be registered, investigated, and resolved through the Project's external (community) Grievance Redress Mechanism (GRM), which is outlined in Chapter 6.

# 11 BUDGET AND IMPLEMENTATION COSTS

## 11.1 Implementation costs

The total budget for the implementation of the draft RAP includes numerous direct costs and indirect expenses associated with the delivery of compensation, transitional support, and livelihood restoration initiatives.

The table below provides an itemized budget for the project draft RAP.

**Table 11-1 Summary of total the indicative budget associated with the implementation of the draft RAP**

No	ITEM	AMOUNTS IN UZBEK SOUMS	AMOUNT IN USD
1.	Compensation for fixed structures/assets for herders & disruption allowance impacted by noise shadow & flicker.	707,024,823	54,913
2.	Allowance for movable assets & relocation allowance due to noise, shadow flicker impact	29,641,608	2,302
3.	Accommodation allowance for the PAPs who will be physically displaced (3 months)	23,100,000	1,794
4.	Budget for modification of houses affected by shadow flicker	574,910,211	44,652
5.	Disruption allowance for fixed assets affected by shadow flicker if modification is not possible	28,745,511	2,233
6.	Allowance for movable assets & relocation allowance due to shadow flicker impact if mitigation is not possible	67,455,577	5,239
7.	Livestock feed allowance (2 years)	3,253,770,513	252,713
8.	Workers 6 months' salary compensation in case of job loss	1,637,586,000	127,188
9.	Support to significantly affected PAHs	16,720,000	1,299
10.	Vulnerable group support	90,090,000	6,997
11.	Livelihood restoration program	1,931,302,500	150,000
12.	Forestry Dept. Compensation budget	TBD	TBD
<b>Implementation Costs</b>			
13.	Hiring of a full time CLO	322,138,360	25,020
14.	Hiring of a full time E&S Manager	322,138,360	25,020
15.	Hiring of a full time Social Manager	322,138,360	25,020
16.	RAP Interim Compliance Review Audit	318,318,566	24,723
17.	RAP close-out audit	318,318,566	24,723
<b>Sub-total</b>		<b>9,963,398,954</b>	<b>773,835</b>
18.	Contingency sum 20%	<b>1,992,679,791</b>	<b>154,767</b>
<b>Total</b>		<b>11,956,078,745</b>	<b>928,602</b>

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## 11.2 Contingency Fund

The indicative draft RAP delivery budget will be reviewed and updated based on the outcomes of the livelihood restoration programs feasibility studies and monitoring requirements. Further, 20% of the total budget has been apportioned to the management of unforeseeable impacts. The contingency fund will also provide for the delivery of compensation and supplemental livelihood assistance to any PAPs identified and validated post the original cut-off date for the census (if any). The delivery of compensation, transitional support and livelihood restoration initiatives for livelihood impacts which are not covered herein will follow the principles and criteria set out in this plan and the budget will be updated to reflect the updates for the final RAP.

## 12 INSTITUTIONAL ARRANGEMENT

The planning, preparation and implementation of the involves distinct processes and different parties/stakeholders with different roles and responsibilities. Various State Agencies and Institutions are responsible for the different functions in the land acquisition and resettlement process and implementation. Uzbek law stipulates that the decision on land acquisition for state and public needs is made by local state authorities (district authorities).

### 12.1 Government Agencies

#### 12.1.1 NEGU

- Enforcement of the health protection zone during the operational phase of the WTGs and OHTLs.
- Ensure the implementation and monitoring of the final OHTL operational phase requirements.
- Implement the GRM to ensure that the PAPs grievances are addressed during the operational phase of the OHTL.

#### 12.1.2 Bukhara Regional Government

- Allocate the land required for the Project development to the Ministry of Energy (MoE).
- Assistance in the identification of socioeconomically vulnerable households for preferential recruitment in project-related employment.
- Provision of strategic support in the delivery of joint livelihood restoration initiatives.

#### 12.1.3 Gijduvan & Shofirkon Municipalities

- Provision of cadastral information for the census, for the preliminary identification of PAPs.
- Provision of feedback regarding contextually appropriate livelihood restoration initiatives at the household.
- Provision of contact information for legal landholders who are not readily reachable for the surveys (including absent land users).
- Assistance in the identification of socioeconomically vulnerable households for preferential recruitment in project-related employment.
- Provision of strategic support in the delivery of joint livelihood restoration initiatives.

#### 12.1.4 Veterinary Committee

- Provision of feedback regarding the land use at the Project site.
- Provision of clarity on how the reforms relating to the management of pastoral land will be implemented and how this might affect the land users on site.
- Provision of strategic support in the delivery of joint livelihood restoration initiatives.

### 12.2 ACWA Power & the Project Company

The Project Developer has a spearheading role in the development and implementation of the draft and final RAP. On the Project Company level, responsibilities are mainly distributed between top management and technical staff dedicated to the draft and final RAP.

#### 12.2.1 Project Company CEO

The CEO will serve an executive role in the implementation of the draft and final RAP, in line with corporate and project-level E&S policies. Relevant responsibilities include:

- Execution of the Project Company's Land Lease Agreements (LLAs) with the Ministry of Energy.
- Oversight of corporate social responsibility engagements, including the management of livelihood risks and impacts through the implementation of the draft and final RAP.
- Allocation of sufficient resources for the implementation of the draft and final RAP and the hiring of the implementation staff.
- Signature of compensation agreements for PAPs entitled to compensation and other monetary assistance.

#### 12.2.2 E&S Manager

The E&S Manager will be entrusted with the management of the Project Company's E&S department, which includes in-house Social Manager responsible for the implementation of the draft and final RAP.

- This duty involves, among other responsibilities, technical oversight and support for the implementation of social safeguards in line with the project E&S policy, ESIA, draft and final RAP and ESAP, as well as the coordination of E&S resources, throughout the Project's lifetime.
- Coordination with the Project Company's top management for the establishment of an E&S team within the Project Company, which will include CLOs who will be directly involved in the implementation of this plan.

- Coordination with the Project Company's top management for the recruitment of external experts required for the delivery of livelihood restoration initiatives for PAPs.
- Coordination with the Project Company's top management for the engagement of Lenders' E&S Advisor, for undertaking regular, independent monitoring of this plan including the completion audit.
- Institution of the project-level E&S Policy, which will include a commitment towards the management of livelihood impacts in line with legal requirements and compliance obligations.
- Development of the final RAP (i.e., through updates or addenda) over the course of the project implementation, if additional assessment and mitigation is required for additional impacts, or inadequately mitigated impacts.
- Coordination with the Project Company's financial department for the disbursement of tax-inclusive payments for monetary commitments specified in in this plan (i.e., internal funding for compensation, transitional support, and livelihood restoration initiatives).
- Coordination with the Project Company's Human Resource (HR) Department and the EPC Contractor's E&S Manager to ensure the delivery of transitional support for PAPs through project employment.
- Review of compensation agreements, in coordination with the Project Company's legal department.
- Participation in site visits and stakeholder engagements integrating into internal and external E&S monitoring related to this plan.
- Review of regular internal E&S monitoring reports, which will include information relating to livelihood impacts and the progress of relevant mitigation.
- Maintaining an inventory of draft and final RAP documents, internal E&S monitoring reports and grievance registers.
- Review of external (community) grievances in relation to land access and livelihood impacts, and oversight of remedial action, in coordination with the Project's EPC Contractor.
- Management of Corrective Action Plans (CAPs) for any RAP-related non-conformances during the project implementation in coordination with the E&S Manager.

### 12.2.3 Social Manager

An experienced Social Manager will be employed by the Project Company and their role will involve among other responsibilities, implementing the requirements of this draft and the final RAP, SEP and the ESAP.

- Implement the requirements of this plan in coordination with the E&S Manager and the overall E&S team including the CLO.

- Build the capacity of the Project Company's CLO and the EPC Contractor's CLO so that they can perform their responsibilities under the requirements of this plan.
- Oversight the roles and responsibilities of the CLOs.
- Review of compensation agreements, in coordination with the E&S Manager and the legal team.
- Engagement with PAPs for the signature of bilateral compensation agreements between the PAPs and Project Company.
- Coordination with the Project Company's EPC Contractor to ensure the provision of construction updates, and timely construction notices and training to PAPs.
- Implementation of transitional support commitments and livelihood restoration initiatives, in collaboration with the EPC Contractor and expert consultants, as relevant.
- Undertake site visits and stakeholder engagements integrating into internal and external E&S monitoring of this plan in coordination with the E&S Manger and CLOs.
- Prepare internal monitoring reports in relation to livelihood impacts and the progress of relevant mitigations.
- Maintain an inventory of documents, draft and final RAP monitoring reports, MoMs, grievance log etc in coordination with the CLOs.
- Respond to grievances received in coordination with the E&S Manager and the CLOs and maintain a GRM log.
- Management of CAP for any non-conformances during the project implementation in coordination with the E&S management.
- Monitoring of compensation and transitional support payments, and follow-ups with PAPs to ensure compensation receipt, prior to displacement and/or site handover to the EPC Contractor.
- Chair the RAP Committee and undertake a capacity assessment to determine the required capacity building needs for the Committee to be able to perform their duties.
- Coordination with the Project Engineer in the implementation of the shadow & flicker mitigations.
- Development of the final RAP (i.e., through updates or addenda) over the course of the project implementation, if additional assessment and mitigation is required for additional impacts, or inadequately mitigated impacts.

#### 12.2.4 Community Liaison Officer

Designated CLOs play a subordinate role in the execution of the draft and final RAP, under the oversight of the E&S Manager.

- Development of the draft and final RAP database, and the collection/ completion of contact and banking information for all PAPs registered in the RAP census.
- Preparation of any outstanding compensation agreements for PAPs.
- Ensuring that prior notice has been delivered to PAPs subject to physical and economic displacement involving the demolition of built assets.
- Engagement with PAPs for the signature of bilateral compensation agreements between the PAPs and Project Company.
- Monitoring of compensation and transitional support payments, and follow-up with PAPs to ensure compensation receipt, prior site handover to the EPC Contractor.
- Implementation of transitional support commitments and livelihood restoration initiatives, in collaboration with the EPC Contractor and expert consultants, as relevant.
- Registration and management of the draft and final RAP-related grievances, as well as related record-keeping via grievance forms and the grievance register.
- Preparation of internal E&S monitoring reports, which will include information pertaining to the draft and final RAP implementation.
- Implementation of CAP commitments.
- Take MoMs and keep records of the draft and final RAP Committee activities including those related to their training.

### 12.2.5 Project Engineer

- Inspect the immovable houses and structures that require the orientation of windows and doors to be modified to mitigate against shadow & flicker impacts.
- Provide guidance to the Project Social Manager and E&S Manager on the structures that can be modified without affecting their integrity.
- Supervise the modification of the structures regardless of whether they are modified by the Project or the PAP.
- Inspect the integrity of all the applicable structures after their modification has been completed for sign off.

## 12.3 EPC Contractor

While the EPC Contractor does not have a direct involvement in land acquisition for the Project's construction and operational phases, the EPC Contractor's E&S department will fulfil the following responsibilities in the implementation process:

- Preparation & implementation of a Traffic & Transportation Management Plan in coordination with the Project Company E&S team.

- Manage works to ensure no encroachment, flag and support in the management of an unanticipated impacts.
- Preparation of regular E&S monitoring reports, which should include any impacts related to accidental property damage and related mitigation.
- Site restoration following the completion of construction activities, to enable continued grazing within land impacted by the project.

### 12.3.1 EPC Contractor CLO

The EPC will appoint a CLO who will undertake the following key roles in coordination with the Project Company Social Manager and CLO:

- Provision of a follow-up prior notice to PAPs subject to physical and economic displacement involving the demolition of built assets, to allow for recovery of moveable assets and recovery of reusable materials after demolition, where applicable.
- Consultation and engagement with the PAPs in coordination with the Project Company's Social Manager and CLO.
- Reporting any RAP-related incidents (e.g., land-related issues and work stoppage) to the Project Company Social Manager.
- Recording of grievances in relation to land access and livelihood impacts, and reporting of the same to the Project Company Social Manager for further action.

## 12.4 RAP Committee

### 12.4.1 Objectives of the Committee

- To support the investigation and verification of any future claims to compensation and support, from entities that were not included in the census, socio-economic and asset inventory surveys.
- Support in the resolution of grievances and disputes over the entitlements, as part of the project's external GRM.
- To support the mediation or any related social incidents during construction.
- Provide an additional line of implementation monitoring, in the interests of PAPs, to ensure that all compensation and support is implemented in line with the program.
- Highlight any significant, residual livelihood impacts on project affected households, over the course of implementation monitoring, to ensure urgent corrective livelihood restoration assistance.
- To provide advisory inputs to the enhancement of livelihoods measures established in this plan, in the event of a critical failure to meet the intended outcomes.

## 12.4.2 Composition of the Committee

The proposed members of the Committee are as provided in the table below.

No	NAME OF ORGANISATION	SPHERE/FIELD OF ACTIVITIES OF ORGANISATION	NUMBER OF ALLOCATED EXPERTS	POSITION OF ALLOCATED EXPERT
1	Bukhara Veterinary & Livestock Department Committee	The Committee is in charge of pastoral land in the Project region	1	TBD
2	Shofirkon District Khokimiyat	The Project is being developed in these two districts, with certain areas of land falling under their respective administrative management.	1	TBD
3	Gijduvon District Khokimiyat		1	TBD
4	Kokcha LLC	Herders who lease the land under their management will be impacted by the Project	1	Director
5	Galaba LLC		1	Director
6	2 herder representatives	The PAPs will experience the impacts from the Project, and they will therefore require to be represented in the Committee.	2	TBC
7	2 workers representatives		2	TBC
8	Social Manager	The Social Manager will act as the Chair of the Committee.	1	Project Company
9	CLO	Support the Social Manager in their role as the Chair of the Committee.	1	

The Committee will meet on a regular basis to review the progress of implementing this plan. The Committee will meet at least every three months in the first year of the draft and final RAP implementation and biannually thereafter until the final RAP Completion Audit is undertaken, and any further actions are closed out.

It will be essential that the Committee members have the required capacity. As such, the Project Company will provide the capacity building to enable the members involved to meet the set objectives. The capacity building activities will be defined through an initial gap analysis assessment to identify the overall capacity of the individuals in the Committee and the need for specific training.

The capacity building activities may include workshops on:

- The purpose and objectives of the draft and final RAP.
- Gaps between the national and lenders requirements and the actions taken by the project to address these gaps.

- The eligibility and entitlement matrix.
- Livelihood restoration programs.
- Implementation of the GRM.
- Implementation schedule and milestones.
- Content of the monitoring requirements that will be used to demonstrate that the PAPs are not worse off than they were because of the project.
- Project Company Code of Conduct.

All the members of the Committee will be asked to sign confidential agreements in the language most familiar to them to ensure that the confidentiality of the PAPs and their personal data is maintained.

**Note:** Consultations are currently on-going with the government agencies & clusters above to determine their willingness to be part of the committee. Additionally, the PAPs will elect their representative during the disclosure of the draft RAP.

## 12.5 Local Consultant for Specialized Livelihood Restoration Program

At the draft and final RAP implementation stage, the Project Company will engage competent local experts for the development and delivery of the tailored livelihood restoration programs.

## 12.6 Independent E&S Consultant

The Project Developer has appointed an E&S consultant for undertaking the Project ESIA and draft and final RAP up to the time of completion and acceptance of the final RAP document by the lenders.

- The Consultant is responsible for the conduct of draft RAP-oriented data collection, expert valuation surveys, and the formulation of a responsive plan, to ensure the implementation of avoidance, mitigation and offset measures for livelihood impacts related to project-related land expropriation.
- As part of the draft and final RAP completion, the Consultant will undertake the disclosure of the draft and final RAP compensation and assistance packages to the PAPs, for the PAPs' reference and feedback, in advance of subsequent compensation agreements.
- Past the completion of the final RAP and its acceptance by the PAPs, Project Developer and Project Lenders at the ESDD stage, the Consultant will be tasked with providing updates or addenda to the project final RAP, for any additional impacts associated with project facilities which are not included herein.

- The Consultant will also be primarily responsible for implementing stakeholder engagement and grievance management in relation to land-take and livelihood restoration, in line with the Project SEP, up to the time of the RAP completion and acceptance. The Project Company's and EPC Contractor's E&S staff will take over this task, upon the finalization of this plan.
- Handover and undertake mandatory capacity building trainings for the Project Company entire team dealing with the implementation of this plan.

## 12.7 Valuation Consultant

The inventory and valuation process was conducted by LLC Evaluation Consulting Centre (Sirdaryo Mustakil Baholash Va Ekspertiza) who are licensed by the Republic State Committee for Privatization and Development of Competition. The valuator was involved in the inventory and valuation of all the assets of the PAPs within the Project footprint and along OHTL.

## 12.8 Project Lenders

ADB is the lender providing financing for the proposed Project. This financial institution will also periodically review the Project and implementation of the draft and final RAP. They will also be involved in the review and approval of the draft and final RAP and its disclosure.

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## 13 IMPLEMENTATION SCHEDULE

The draft and final RAP will be finalized and implemented to ensure that physical & economic displacement impacts resulting from project-related land requirements are mitigated. The implementation schedule for the major milestones in the implementation of the plan are provided in the Gantt chart below.

**Table 13-1 RAP initial implementation schedule**

DRAFT & FINAL LALRP TASKS	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2025										2026										2027													
Preparation of the draft and final RAP																																		
Approval of the draft & final RAP by project lenders																																		
Online and disclosure of the draft & final RAP and packages																																		
Negotiations & finalisation of compensation with PAPs																																		
Notification to PAPs on the start of LNTP and construction works																																		
Signing of individual compensation agreements with PAPs																																		
Payment of compensation packages to PAPs																																		
Inspection of accommodation requiring modification due to shadow flicker																																		
Full development of a LR program through a feasibility study by a livestock expert.																																		
Approval of the final RAP by the lenders																																		
Submission of the compensation report to lenders																																		
Confirmation audit of completed compensation																																		
Implementation of Livelihood Restoration initiatives																																		
Submission of semi-annual and annual monitoring reports to Project Lenders																																		

DRAFT & FINAL LALRP TASKS	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2025										2026										2027													
Notification of PAPs who will be affected by shadow flicker.																																		
Interim final RAP compliance review audit																																		
Final RAP Compliance Audit																																		
Monitoring																																		

## 14 MONITORING, EVALUATION AND REPORTING

Monitoring and Evaluation (M&E), and associated reporting, are an integral aspect of the draft and final RAP implementation. The M&E system framed for the draft and final RAP would serve to assess the progress and effectiveness of mitigation commitments developed to address the adverse livelihood impacts of project-induced displacement.

The overall goal of the draft and final RAP measures (i.e., compensation and supplementary assistance) is to ensure that the economic status and living conditions of PAPs are restored, or ideally, improved, relative to baseline conditions. Household-level baseline socioeconomic information gathered over the course of the draft RAP surveys provide a benchmark for subsequent M&E.

Upon the approval and public disclosure of the project draft and final RAP, the Project Company will assume the overall responsibility for the institution of the M&E framework. The framework will consist of specific objectives, corresponding Key Performance Indicators (KPIs), time-bound targets, Means of Verification (MoV), reporting schedule, and entities involved in M&E arrangements. A preliminary M&E framework for the Project is presented in the table below.

### 14.1 Compensation Reports

The Project Company will prepare Compensation Reports detailing whether compensation has been disbursed according to the entitlements and within the agreed timelines for all eligible PAPs. The Compensation Reports will demonstrate disbursement of compensation at full replacement cost to all eligible PAHs and affected entities.

Additionally, an independent consultant will be engaged to audit the completed compensation process and reports and provide official verification to ensure that the process aligns with the requirements established in this plan.

### 14.2 Internal Monitoring

The primary goal of monitoring is to evaluate the implementation progress of the draft and final RAP concerning livelihood restoration outcomes, assess their impact on the living standards of PAPs, and determine whether the objectives have been met or if corrective actions are needed. The monitoring indicators mentioned earlier will be updated and will serve as the foundation for the monitoring process.

The Project will develop and implement the monitoring program. The monitoring program will encompass both activity monitoring and outcome monitoring. The monitoring of the RAP's implementation will continue until it is considered substantially complete, including any

corrective actions that arise from the RAP completion audit. This monitoring will also address unexpected physical and economic displacement impacts during the construction phase, including any grievances and the corrective actions taken in response.

During this monitoring period, ACWA Power/Project Company will submit semi-annual monitoring reports during the implementation of the livelihood programs. These reports will be submitted to the lenders and made available on the respective lenders' websites according if required.

In addition to the above, the Project will engage an independent external monitoring consultant to oversee all processes related to the implementation of the draft and final RAP. The external monitoring will align with internal requirements, occurring semi-annually during the implementation of the livelihood programs. The external monitoring consultant will report to the lenders.

### **14.3 Interim RAP Compliance Report**

An interim compliance review audit of the final RAP will be conducted once most of the compensation and support measures have been implemented to assess the progress in restoring the livelihoods of PAPs. A report will be prepared and submitted to the lenders for their review, to evaluate the project's progress in implementing livelihood restoration activities and to determine if any additional or adaptive actions are necessary.

### **14.4 Final RAP Completion Audit**

This audit will be conducted after the implementation of the final RAP, or when deemed ready by the lenders, to assess whether the final RAP has achieved its objectives and if the livelihoods of all PAPs have been restored to pre-project levels or improved. A final RAP Implementation Compliance Report will be prepared and submitted to the lenders for their review and to determine if any further actions are necessary.

**Table 14-1 Monitoring and Evaluation (M&E) framework for the implementation of the RAP**

No	KEY PERFORMANCE INDICATORS (KPIs)	TARGETS	TARGET TIMEFRAME	MEANS OF VERIFICATION	M&E FREQUENCY	RESPONSIBILITY
1	Number of full-time RAP implementation staff	≥2	Continuously up to the completion of the final RAP	Project Company staff records Monthly E&S Monitoring Reports	Monthly	Project Company Project Lenders
2	Number of compensation agreements/contracts signed	100%	Before the payment of compensation	Compensation agreements	As per the entitlements	Project Company Social Manager Project Lenders
3	Number of PAHs who have received financial literacy training (disaggregated by gender)	>90%	Before the payment of compensation	Training agenda MoMs & attendance sheet	Once before the payment of compensation	Project Company Social Manager Project Lenders
4	Percentage of PAHs that have received their full compensation (at full replacement cost)	100%	Before start of construction	Compensation Report	As per the compensation schedule	Project Company Social Manager Project Lenders
5	Percentage of herders & workers who have received transitional support	100% (of those eligible)	Before start of construction	Compensation Report	As per the compensation schedule	Project Company Social Manager Project Lenders
6	Percentage of significantly affected and vulnerable PAHs and PAPs who have received the committed support (disaggregated by gender)	100%	Continuously throughout the implementation of this plan	Compensation Reports Livelihood Restoration Program progress reports	As applicable for each report	Project Company Social Manager LR Expert Project Lenders

No	KEY PERFORMANCE INDICATORS (KPIs)	TARGETS	TARGET TIMEFRAME	MEANS OF VERIFICATION	M&E FREQUENCY	RESPONSIBILITY
7	Verification of compensation reports	Compensation verification of all (100%) of the PAHs.	Before the start of construction	Compensation Report	Once-off for Compensation Report	Project Leaders
8	Number of physically displaced PAHs who have re-established their accommodation and support structures outside of the Project area of impact.	100%	Not later than the start of NTP	Quarterly E&S Monitoring Report	Quarterly	Project Company Social Manager Project Leaders
9	Percentage of relocated herders and workers reporting ability to resume herding activities & accessing adequate grazing land.	100%	Continuously up to the completion of the final RAP	Herders & workers survey & interview records Grievance Log Observations	On-going	Project Company Social Manager Project Leaders
10	Percentage of accommodation structures modified due to impact by shadow flicker	100%	Before the start of operation	Structural inspection survey report	Once before the start of operation	Project Company Social Manager Project Engineer Project Leaders
11	Percentage of herders/workers reporting satisfaction with the shadow & flicker modifications	100%	During the operation phase	Herders & workers survey & interview records Grievance Log	Monthly	Project Company Social Manager Project Leaders
12	Number of accommodation structures requiring additional or corrective modification because of shadow & flicker	≤2	During the first year of operation	Follow up inspections Herders & workers survey & interview records Grievance Log	Quarterly	Project Company Social Manager Project Engineer Project Leaders

No	KEY PERFORMANCE INDICATORS (KPIs)	TARGETS	TARGET TIMEFRAME	MEANS OF VERIFICATION	M&E FREQUENCY	RESPONSIBILITY
13	Number of households affected by shadow & flicker requiring relocation due to : (i) Structural constraints of their structures or (ii) Ineffective shadow flicker modifications	0	(i) 6 months before the start of operation (ii) During the first year of operation	Technical monitoring reports Household interviews	(i) Once 6 months before the start of operation  (ii) Quarterly	Project Company Social Manager Project Lenders
14	Percentage of herders & workers who have maintained access to grazing areas outside of the Project footprint.	100%	Continuously throughout the implementation of this plan	Consultation with herders & their workers (MoMs, interview logs) Site visits to confirm active grazing & observation logs	Quarterly	Project Company Social Manager Project Lenders
15	Livelihood Restoration feasibility study	100%	Before impact	Report(s) from the LR experts	Once before impact	Project Company LR Expert Project Lenders
16	Percentage of PAHs who have participated in LR programs (disaggregated by gender)	100%	Continuously up to the completion of the LR programs	Attendance and/or enrolment sheets per program Livelihood Restoration Program implementation & progress reports	Quarterly	Project Company Social Manager LR Expert Project Lenders
17	Percentage of herders & workers who gave been trained on the reforms in the management of pastureland and E-yaylov use	100%	During the implementation of the LR program	Training agenda MoMs & attendance sheet	Twice – once before the launch of E-yaylov platform and once after	Project Company Social Manager Veterinary Committee Project Lenders

No	KEY PERFORMANCE INDICATORS (KPIs)	TARGETS	TARGET TIMEFRAME	MEANS OF VERIFICATION	M&E FREQUENCY	RESPONSIBILITY
18	Percentage of herders/workers who apply for land using the E-yaylov platform within 6 months of its launch	≥70%	First year of the platform launch	PAPs follow up interviews	6 months after platform launch	Project Company Social Manager Project Leaders
19	Number of herders & workers who have transitioned from annual agreements to long term agreements through E-yaylov	TBD based on platform functionality	First year of the platform launch	Lease records from herders/cadastral dept.	Annually	Project Company Social Manager Project Leaders
20	Number of workers & herders who report improved financial status	≥75%	First year after the implementation of the LR programs	Household income surveys FDGs & KIIs	Annually	Project Company Social Manager Project Leaders
21	Number of PAHs prioritised for employment (disaggregated by gender)	>90%	During construction & at the start of operation	HR Recruitment Logs Selection criteria documentation	Quarterly	Project Company Social Manager HR Manager Project Leaders
22	Percentage of PAH members receiving pre-employment training (disaggregated by gender)	>90%	During construction & at the start of operation	Training attendance sheets, Certificates	Pre-training cycle	Project Company Social Manager HR Manager Project Leaders
23	Number of PAHs employed after training (disaggregated by gender)	>90%	During construction & at the start of operation	Employment contracts	Quarterly	Project Company Social Manager HR Manager Project Leaders
24	Percentage of workers who retain their jobs post-	≤ 10%		Consultation outcomes with herders & workers	Quarterly	Project Company Social Manager

No	KEY PERFORMANCE INDICATORS (KPIs)	TARGETS	TARGET TIMEFRAME	MEANS OF VERIFICATION	M&E FREQUENCY	RESPONSIBILITY
	impact(disaggregated by gender)			Site verifications Follow up surveys/interviews with those who lose their jobs & employer confirmation		Project Lenders
25	Percentage of grievances closed out (resolved) within the timeframe specified in the GRM (gender segregated where relevant)	>90%	Continuously up to the completion RAP implementation	Grievance Logs, Monthly E&S Monitoring reporting	Monthly	Project Company Social Manager Project Lenders

## APPENDIX A – PD ON LAND ALLOCATION

### Presidential Decree of the Republic of Uzbekistan

#### **On Measures for the implementation of the investment project "Construction of a 300 MW wind farm, and overhead power transmission lines in Gijduvan district of Bukhara Region"**

In order to ensure stable supply of energy resources to the population and economic sectors, to reduce natural gas consumption in electricity generation, as well as to attract foreign direct investment in expanding the use of renewable energy sources:

1. To take into account that:

a) **"ACWA Power Company (Saudi Listed Joint Stock Company)"** (Saudi Arabia) (hereinafter referred to as the Investor) has established the FE LLC "ACWA Power Gijduvan Wind" (hereinafter referred to as the Project Company) within the framework of the investment project "Construction of a 300 MW wind farm, and overhead power transmission lines in Gijduvan district of Bukhara Region" (hereinafter referred to as the Investment Project);

b) between the Government of the Republic of Uzbekistan represented by the Ministry of Investments, Industry and Trade, the Investor, and the Project Company was signed an **Investment Agreement** (hereinafter referred to as the Investment Agreement) on November 27, 2023, providing for the implementation by the Investor and the Project Company of:

design, financing, construction and operation of a 300 MW wind farm and overhead power transmission lines in Gijduvan district of Bukhara region throughout the entire period of the Investment Project implementation;

attraction of **direct foreign investments in the total amount of 403 million US dollars** according to preliminary estimation with assumption of possible risks;

c) as a result of direct negotiations, **on November 27, 2023 the Power Purchase Agreement** (hereinafter referred to as the **Agreement**) was signed between JSC "National Electric Grid of Uzbekistan" and the Project Company, pursuant to which:

The Project Company assumes the obligation of **guaranteed sale** of generated electricity to JSC "National Electric Grid of Uzbekistan";

The Project Company provides a **guarantee** from a first-class **foreign bank** as security for the proper fulfillment of its obligations during the construction period in the amount of **USD 11 million**;

The **Project Company** under the Investment Project undertakes **to construct** overhead power transmission lines to connect wind farm to the unified power network and, once commissioned, to transfer them to the JSC "National Electric Networks of Uzbekistan";

the **costs** incurred for the overhead power transmission lines constructed by the Project Company **shall be covered by JSC "National Electric Grid of Uzbekistan" within 10 years on the basis of monthly payments**;

JSC "National Electric Grid of Uzbekistan" undertakes to **guarantee the purchase of electricity and payment for electricity in national currency for 25 years**.

2. Within the framework of the implementation of the Investment Project:

**to approve the Investment Agreement** signed between the Government of the Republic of Uzbekistan represented by the Ministry of Investment, Industry and Trade, the Investor and the Project Company;

**to approve the Power Purchase Agreement** concluded between JSC “National Electric Grid of Uzbekistan” and the Project Company.

3. To authorize the Ministry of Investment, Industry and Trade, the Ministry of Energy and JSC "National Electric Grid of Uzbekistan" to conclude agreements **on direct transfer of rights** of the Project Company and the Investor **to other creditors participating in the financing of the Investment Project** in case the Project Company fails to fulfill its obligations under the agreements signed within the framework of the Investment Project.

4. To authorize JSC “National Electric Grid of Uzbekistan” to:

carry out jointly with the Project Company the **selection and conclusion of contracts with international independent engineering companies and other consultants** for the implementation of the Investment Project **without obligatory expertise** in accordance with the procedures defined in the Agreement;

**open** an approved foreign currency and revolving **letter of credit** in a foreign bank in favor of the Project Company **to secure the fulfillment of the obligation** to purchase electricity generated by the Project Company for a period of three months.

5. To authorize the Minister of Economy and Finance to sign on behalf of the Government of the Republic of Uzbekistan an agreement with a foreign bank, which opens a letter of credit, on reimbursement of its expenses in a form acceptable to the Government of the Republic of Uzbekistan, in case of fulfillment of obligations of JSC "National Electric Grid of Uzbekistan" to the abovementioned bank under the guarantee of the Asian Development Bank, the World Bank or the European Bank for Reconstruction and Development.

6. To grant the Project Company within the framework of the implementation of the Investment Project after payment of all taxes and fees the following rights within the limits of the Investment Project financing:

to open bank accounts in foreign banks abroad to obtain loans, receive and utilize funds in foreign currency (including credit proceeds in foreign currency);

to directly make payments to foreign contracting organizations, suppliers or foreign creditors outside the Republic of Uzbekistan without making such payments through bank accounts in the Republic of Uzbekistan.

7. The Administration of Bukhara region is instructed to:

select land plots in the Gijduvan district of Bukhara region for the construction of a wind power plant, Overhead Transmission lines, and electrical infrastructure facilities within a monthly period with the involvement of the Ministry of Energy, Ministry of Investments, Industry and Trade, Ministry of Agriculture, and the Project Company within the implementation of the Investment Project, make clarifications to the boundaries of the selected land plots, and submit corresponding proposals to the Government Commission for consideration of changes in the land categories of agricultural land and forest land;

allocate the selected land plots on a permanent use basis to the Ministry of Energy based on the project documentation presented by the Project Company.

The Ministry of Energy is to ensure the transfer of the above-mentioned land plots to the Project Company for lease for a period equal to the duration of the Investment Project. The rental fee paid by the Project Company for the land plots is to be equated to the size of the land tax.

8. Within the framework of the Investment Project:

to exempt the Ministry of Energy from reimbursement of losses of agricultural production (compensation payments) for the use (change of category) of agricultural land;

Norms and rules for construction and land works related to the construction of a wind power plant, as well as designing building foundations and structures, are regulated by international standards in accordance with the provisions of the Agreement;

Payments for expenses incurred for purchasing electricity and constructing Overhead Transmission lines are made in the national currency at a fixed tariff denominated in foreign currency.

9. At the request of the Project Company within the framework of the Investment Project realization:

**The Ministry of Foreign Affairs** - to ensure that entry visas are issued to foreign specialists in accordance with the established procedure, if necessary - at the Islam Karimov Tashkent International Airport;

**The Ministry of Internal Affairs** - to ensure the extension of multiple-entry visas, as well as registration and its extension at the place of temporary stay for foreign specialists of contracting organizations, as well as their family members;

**The Ministry of Employment and Poverty Reduction** - to ensure the issuance (extension) in the prescribed manner to foreign citizens of permits for the right to carry out labor activities in the territory of the Republic of Uzbekistan.

10. The Ministry of Investment, Industry and Trade to **establish permanent control over the implementation** of the Investment Project, as well as the **fulfillment of obligations** by the parties under the Investment Agreement and the Agreement.

11. The Ministry of Justice to issue legal opinions on agreements signed in accordance with the Investment Agreement and its provisions within the framework of the implementation of the Investment Project.

12. The Ministry of Ecology, Environmental Protection and Climate Change shall ensure, in accordance with the established procedure, the environmental expertise of project documentation and compliance with the acts of legislation on nature protection during the implementation of the Investment Project.

13. To assign the Minister of Energy Mirzamakhmudov J.T. with personal responsibility for effective organization of execution of this resolution.

To assign the Prime Minister of the Republic of Uzbekistan A.N. Aripov quarterly discussion of the implementation of this resolution, coordination and control over the activities of agencies responsible for its implementation.

President of the Republic of Uzbekistan Sh. Mirziyoyev

Tashkent, March 5, 2024, No. PD-116

*(National Legal Database, March 6, 2024, No. 07/24/116/0186)*

## APPENDIX B – PAHs HOUSEHOLD COMPOSITION

No	PAH ID	NUMBER OF HOUSEHOLD MEMBERS	BREAKDOWN BY GENDER		NOTES
			Male	Female	
1	H1	11	5	6	N/A
2	H1W1	3	2	1	
3	H1W2	5	4	1	
4	H1W3	6	4	2	
5	H1W4	9	4	5	
6	H1W5	6	2	4	
7	H2	2	1	1	N/A
	H2W1	0	0	0	H2W1 is a son of H1W1 and lives in the same household
8	H2W2	6	4	2	
9	H2W3	9	4	5	
10	H3	9	5	4	N/A
11	H3W1	10	5	5	
12	H3W2	5	2	3	
	H3W3	0	0	0	H3W3 is a part of H3 household
13	H3W4	7	4	3	
14	H3W5	6	3	3	
	H3W6	0	0	0	H3W6 is a part of H3W4 household
15	H4	7	2	5	N/A
16	H4W1	7	3	4	
17	H4W2	7	4	3	
18	H4W3	3	2	1	
	H4W4	0	0	0	H4W4 is a part of H4 household
19	H5	4	2	2	N/A
	H5W2	0	0	0	H5W2 is a part of H5 household
20	H5W3	8	3	5	
21	H5W4	10	5	5	
22	H5W5	7	4	3	
23	H5W6	6	4	2	
24	H5W7 (newly hired)	5	2	3	
25	H6	3	2	1	N/A

No	PAH ID	NUMBER OF HOUSEHOLD MEMBERS	BREAKDOWN BY GENDER		NOTES
			Male	Female	
26	H6W1	3	2	1	
27	H6W2	5	2	3	
	H6W4	0	0	0	H6W4 is a part of H6 household
28	H6W5	7	3	4	
29	H7	7	4	3	N/A
	H7W1	0	0	0	H7W1 is a part of H7 household
30	H8	5	2	3	N/A
31	H8W2	8	3	5	
32	H8W3	8	4	4	
33	H8W4	7	4	3	
34	H8W5	3	1	2	
35	H8W6	2	1	1	
36	H8W7	6	1	5	
37	H8W8	8	3	5	
38	H8W9	6	2	4	
39	H9	5	3	2	N/A
40	H9W1	9	4	5	
41	H9W2	13	4	9	
42	H10	7	2	5	N/A
	H10W1	0	0	0	H10W1 is a part of H10 household
43	H10W2	13	4	9	
44	H10W3	7	3	4	
45	H12	9	4	5	N/A
46	H12W1	8	3	5	
47	H12W2	4	3	1	
48	H12W3	7	3	4	
49	H13	8	4	4	N/A
50	H13W1	6	1	5	
51	H13W2	7	4	3	
52	H13W3	6	3	3	
53	H13W4 (newly hired)	3	2	1	
54	H14	7	3	4	N/A
	H14 W1	0	0	0	H14W1 is a part of H14 household

No	PAH ID	NUMBER OF HOUSEHOLD MEMBERS	BREAKDOWN BY GENDER		NOTES
			Male	Female	
55	H14 W2	5	1	4	
56	H14 W3	9	5	4	
57	H15	4	2	2	N/A
58	H15W1	6	3	3	
59	H15W2	3	2	1	
60	H15W3	5	4	1	
61	H15W4	6	2	4	
62	H16	5	2	3	N/A
63	H16W1	6	3	3	
64	H16W2	4	1	3	
65	H17	4	3	1	N/A
66	H17W1	7	5	2	
67	H17W2	6	3	3	
68	H19	5	3	2	N/A
69	H19W1	6	2	4	
70	H19W2	4	2	2	
71	H20	6	3	3	N/A
	H20W1	0	0	0	H20W1 is a part of H20 household
72	H21	4	2	2	N/A
	H21W1	0	0	0	H21W1 is a part of H21 household
73	H22	7	2	5	N/A
74	H23	6	2	4	N/A
75	H23W1 (newly hired)	5	3	2	
76	H23W2 (newly hired)	5	2	3	
	H23W3 (newly hired)	0	0	0	H23W3 part of H23 household
77	H24	5	3	2	N/A
78	FR1	5	2	3	
	<b>Total</b>	483	226	257	

## APPENDIX C – PAHS HOUSEHOLD FINANCIAL STATUS

### INCOMES

#### SIGNIFICANTLY AFFECTED PAPS

No	PAP ID	From the sale of livestock,(UZS)	Income generated from seasonal work (during grazing off season) (UZS)	Financial assistance from mahalla benefits (childcare up to 2 years old, families with children 2-14 years old) (UZS)	Income from grazing the livestock of other citizens, enterprises and farms (UZS)	Old age, long service pension	Money sent/brought by family members, temporary labour Migrants (UZS)
1	H4	8 333 333	4 000 000	0	0	0	0
2	H4W1	1 200 000	1 750 000	0	4 000 000	1 550 000	0
3	H4W2	5 000 000	0	0	0	1 600 000	0
4	H4W3	6 400 000	4 000 000	0	2 000 000	0	0
5	H4W4	0	0	0	7 000 000	0	0
6	H5	33 333 333	0	0	0	0	0
7	H5W2	0	0	0	10 000 000	0	0
8	H5W3	750 000	1 500 000	300 000	4 500 000	1 500 000	0
9	H5W4	5 833 000	0	0	5 000 000	0	0

10	H5W5	5 833 333	1 000 000	1 000 000	0	2 000 000	0
11	H5W6	3 333 333	475 000	0	4 000 000	1 200 000	0
12	H5W7	0	0	0	0	0	0
13	H7	20 000 000	2 000 000	0	0	0	0
14	H7W1	0	0	0	5 000 000	0	0
15	H12	50 000 000	0	300 000	0	0	0
16	H12W1	0	0	0	4 500 000	0	0
17	H12W2	2 000 000	0	0	4 500 000	800 000	0
18	H12W3	0	0	0	3 000 000	1 500 000	0
19	H14	12 500 000	0	0	0	1 900 000	0
20	H14W1	12 500 000	0	0	0	1 900 000	0
21	H14W2	12 500 000	0	2 000 000	0	1 500 000	0
22	H14W3	8 333 000	3 500 000	0	2 500 000	0	0
<b>NON-SIGNIFICANTLY AFFECTED</b>							
No	PAP ID	From the sale of livestock, (UZS)	Income generated from seasonal work (during grazing off season) (UZS)	Mahalla benefits (childcare up to 2 years old, families with children 2-14 years old) (UZS)	Income from grazing the livestock of other citizens, enterprises and farms (UZS)	Old age, long service pension (UZS)	Money sent/brought by family members, temporary labour migrants (UZS)
1	H1	83 000 000	0	0	0	0	0

2	H1W1	0	0	0	6 000 000	0	0
3	H1W2	0	0	0	4 500 000	0	2 000 000
4	H1W3	484 000	0	0	5 000 000	500 000	0
5	H1W4	3 000 000	0	0	2 000 000	1 800 000	0
6	H1W5	3 000 000	0	0	0	0	0
7	H2	50 000 000	0	0	0	0	0
8	H2W1	0	0	0	4 500 000	0	0
9	H2W2	6 000 000	0	0	0	0	0
10	H2W3	5 833 333	0	0	0	500 000	0
11	H3	8 333 333	0	0	0	0	0
12	H3W1	3 000 000	0	0	0	0	0
13	H3W2	10 833 333	30 000 000	0	0	0	0
14	H3W3	0	0	0	8 000 000	0	0
15	H3W4	5 830 000	0	580 000	3 000 000	0	0
16	H3W5	5 000 000	0	1 500 000	0	0	0
17	H3W6	5 833 333	0	580 000	3 000 000	0	0
18	H6	75 000 000	0	0	0	0	0
19	H6W1	0	4 500 000	0	0	600 000	0
20	H6W2	0	0	0	0	0	0

21	H6W4	0	0	0	5 000 000	0	0
22	H6W5	0	0	0	4 500 000	0	0
23	H8	41 666 666	0	0	0	0	0
24	H8W2	500 000	10 500 000	0	2 500 000	0	0
25	H8W3	0	0	0	2 500 000	800 000	2 500 000
26	H8W4	541 667	0	0	2 600 000	0	0
27	H8W5	0	0	0	2 500 000	0	0
28	H8W6	0	0	700 000	2 500 000	0	0
29	H8W7	833 333	0	0	2 500 000	600 000	N/A
30	H8W8	0	2 500 000	0	0	1 000 000	0
31	H8W9	0	0	800 000	2 500 000	400 000	0
32	H9	58 000 000	2 000 000	0	0	0	0
33	H9W1	19 166 000	0	0	5 000 000	0	0
34	H9W2	1 666 000	0	0	0	500 000	0
35	H10	208 333 333	0	0	0	0	0
36	H10W1	0	0	0	0	0	0
37	H10W2	16 666 000	1 000 000	0	1 500 000	2 000 000	0
38	H10W3	5 833 000	1 700 000	0	0	0	0
39	H13	33 333 333	0	0	0	1 200 000	0

40	H13W1	15 000 000	0	600 000	4 500 000	0	0
41	H13W2	70 000 000	0	0	0	750 000	0
42	H13W3	3 000 000	0	600 000	0	0	0
43	H13W4	0	0	0	0	0	0
44	H15	83 333 333	0	0	0	0	0
45	H15W1	0	3 500 000	0	6 000 000	1 300 000	0
46	H15W2	0	0	0	6 000 000	0	0
47	H15W3	15 000 000	1 080 000	0	0	0	0
48	H15W4	0	150 000	660 000	3 000 000	0	0
49	H16	25 000 000	0	500 000	0	0	0
50	H16W1	0	1 200 000	1 350 000	1 500 000	1 800 000	0
51	H16W2	3 333 333	0	0	0	600 000	0
52	H17	166 666 667	0	0	0	0	0
53	H17W1	25 000 000	1 000 000	1 440 000	0	0	0
54	H17W2	0	1 700 000	1 000 000	0	1 200 000	0
55	H19	12 500 000	0	0	0	0	0
56	H19W1	5 833 333	0	0	0	1 400 000	0
57	H19W2	5 000 000	0	0	0	0	0
58	H20	30 000 000	0	0	0	0	0
59	H20W1	0	0	0	5 000 000	0	0

60	H21	14 500 000	2 500 000	0	0	0	0
61	H21W1	0	0	0	4 000 000	0	0
62	H22	29 166 667	0	0	0	0	0
63	H23	50 000 000	0	0	4 000 000	0	0
64	H23W1	0	0	0	0	0	0
65	H23W2	0	0	0	0	0	0
66	H23W3	0	0	0	0	0	0
67	H24	20 000 000	0	0	0	0	0
68	FR1	0	0	0	0	0	0

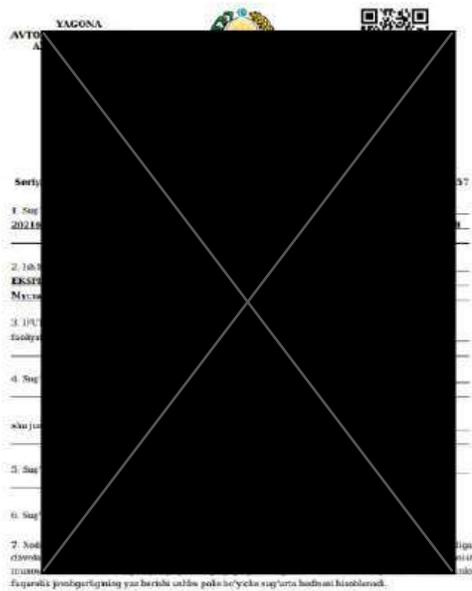
**LOANS**

No	PAP CODE	TYPE OF LOAN	LOAN AMOUNTS (UZS)	YEAR OF TAKING THE LOAN	INSTALMENT PER MONTH (UZS)	FINAL YEAR OF REPAYMENT
1	H5	1) purchasing the motorbike 2) increasing livestock	1) 24,000,000 (1881USD) 2) 33,000,000 (2586 USD)	1) 2023 2) 2022	1) 1,200,000 (94USD) 2) 1,400,000 (109 USD)	1) 2025 2) 2025
2	H8	1) purchasing a refrigerator for LLC 2) car 3) fodder for livestock, 4) motor stoves	1) 1,405,082,480 (110,142 USD) 2) 130,000,000 (10190 USD) 3) 50,000,000 (3919 USD) 4) 31,800,000 (2492 USD) and 30,000,000 (2351 USD)	1) 2019 2) 2023 3) 2024 4) 2024	1) 255138164 (20000 USD) 2) 4,000,000 (313 USD) 3) 1,545,000 (121 USD) 4) 1,500,000 (117 USD) and 1,200,000 (94 USD)	1) 2031 2) 2025 3) 2029 4) 2029
3	H9	mortgage loan for housing	130000000 (10190 USD)	2015	1,900,000 (148USD)	2030
4	H10	loan for cars	340,000,000 (26652 USD)	2022	9,000,000 (705 USD)	2027
5	H13	1)feeding livestock 2) consumer loan	1) 60,000,000 (4703 USD) 2) 3,600,000 (282 USD)	1) 2024 2) 2023	1) 4,500,000 (352 USD) 2) 180,000 (14 USD)	1) 2027 2) 2025
6	H15	feeding livestock	33,000,000 (2586 USD)	2022	1,300,000 (101 USD)	2025
7	H17	consumer loan	10,000,000 (784 USD)	2024	400,000 (31 USD)	2028
8	H20	loan for a car and basic needs	29,000,000 (2273 USD)	2023	1,077,000 (84 USD)	2026
9	H23	loan for a car	80,000,000 (6271 USD)	2018	1,500,000 (117 USD)	2024
10	H24	buying livestock	33,000,000 (2586 USD)	2023	1,131,000 (88 USD)	2026
11	H1W5	buying livestock	110,000,000 (8622 USD)	2020	10,000,000 (783 USD)	2021

No	PAP CODE	TYPE OF LOAN	LOAN AMOUNTS (UZS)	YEAR OF TAKING THE LOAN	INSTALMENT PER MONTH (UZS)	FINAL YEAR OF REPAYMENT
12	H2W2	loan for cars and mortgage loan for housing	26,000,000 (2038 USD)	2022	930,000 (72 USD)	2025
13	H3W2	buying livestock	50,000,000 (3919 USD)	Didn't provide information	3,000,000 (235 USD)	Didn't provide information
14	H4W2	cars	Didn't provide information	Didn't provide information	Didn't provide information	Didn't provide information
15	H4W4	household equipment	15,000,000 (1175 USD)	2023	621,000 (48 USD)	2026
16	H5W3	consumer loan	25,000,000 (1959 USD)	2025	1,000,000 (78 USD)	2028
17	H5W4	fodder for livestock	4,000,000 (313 USD)	2024	200,000 (16 USD)	2027
18	H6W1	household needs	23,000,000 (1802 USD)	2022	1,350,000 (105 USD)	2024
19	H8W8	business activities	15,050,000 (1179 USD)	2024	500,000 (39 USD)	2031
20	H9W1	loan for cars	32,000,000 (2508 USD)	2024	903,000 (71 USD)	2028
21	H10W 1	motorbike	27,000,000 (2116 USD)	2022	1,000,000 (78 USD)	2025
22	H10W 2	business activities	33,000,000 (2586 USD)	2022	1,600,000 (125 USD)	2025
23	H10W 3	loan for a scooter	33,000,000 (2586 USD)	2025	500,000 (39 USD)	2028
24	H12W 1	buying sewing machine	4,700,000 (368 USD)	2022	175,000 (14 USD)	2025
25	H12W 2	buying livestock	30,000,000 (2351 USD)	2023	1,600,000 (125 USD)	2026

No	PAP CODE	TYPE OF LOAN	LOAN AMOUNTS (UZS)	YEAR OF TAKING THE LOAN	INSTALMENT PER MONTH (UZS)	FINAL YEAR OF REPAYMENT
26	H12W 3	household equipment	35,000,000 (2743 USD)	2021	1,350,000 (106 USD)	2024
27	H13W 2	buying livestock	60,000,000 (4703 USD)	2024	4,000,000 (313 USD)	2026
28	H13W 3	buying livestock	15,800,000 (1238 USD)	2022	580,000 (45 USD)	2025
29	H19W 1	1) buying livestock, 2) medical treatment 3) consumer loan	1) 32,400,000 (2539 USD) 2) 95,000,000 (7446 USD) 3) 161,000,000 (12620 USD)	1) 2023 2) 2024 3) 2023	1) 710,000 (56 USD) 2) 9,800,000 (768 USD) 3) 4,000,000 (313 USD)	1) 2030 2) 2026 3) 2030
30	H21W 1	business activities	Didn't provide information	Didn't provide information	Didn't provide information	Didn't provide information

# APPENDIX D – VALUATOR'S CERTIFICATE



## APPENDIX E – NO. OF LIVESTOCK OWNED BY HERDERS & WORKERS

No	PAP ID	LIVESTOCK OWNED BY THE LLC (SHEEP)	PRIVATE LIVESTOCK			
			SHEEP	HORSE	GOATS	COWS
1	H1	-	1100	100	80	0
	H1W1	-	50	6	-	-
	H1W3	-	10	-	-	-
	H1W5	-	90	-	10	-
2	H2		2,704	70	120	0
	H2W2	-	5	-	-	-
3	H3	435	800	-	-	-
	H3W2	-	70	-	30	-
4	H4		800	-	-	1
	H4W1	-	24	-	6	-
	H4W2	-	20	-	10	-
	H4W3	-	10	-	5	-
5	H5		1220	-	180	50
	H5W3	-	20	-	20	-
	H5W4	-	55	-	10	5
	H5W5	-	60	-	20	6
	H5W6	-	30	-	20	4
	H5W7	-	20	-	-	-
6	H6		1500	-	-	-
	H6W1	-	85	-	15	-
	H6W2	-	100	-	-	-
	H6W5	-	170	-	39	-
7	H7		200	-	70	-
8	H8		900	-	-	-
	H8W4	-	-	-	11	-
	H8W7	-	15	-	-	-
	H8W9	-	20	-	-	-

No	PAP ID	LIVESTOCK OWNED BY THE LLC (SHEEP)	PRIVATE LIVESTOCK			
			SHEEP	HORSE	GOATS	COWS
9	H9	-	1,400	-	-	-
	H9W1	-	100	-	10	-
	H9W2	-	100	-	50	-
10	H10	119	2970	82	0	80
	H10W1	-	150	-	30	-
	H10W2	-	200	-	50	-
	H10W3	-	101	--	15	-
11	H12		480	-	200	-
	H12W1	-	39	-	10	-
	H12W2	-	20	-	-	-
	H12W3	-	30	-	10	-
12	H13	520	1000	-	-	-
	H13W1	-	60	-	40	-
	H13W2	-	60	-	-	-
	H13W3	-	27	-	13	-
13	H14		850	50	-	-
14	H15	-	1736	-	51	-
	H15W3	-	150	-	50	-
	H15W4	-	40	-	-	-
15	H16		400	-	100	-
	H16W1	-	40	-	30	-
	H16W2 Resigned but the livestock remain under the care of H16	-	70	-	-	-
16	H17	-	800	-	200	-
	H17W1	-	45	-	38	-
17	H19		300	-	-	-
	H19W1	-	60	-	-	-

No	PAP ID	LIVESTOCK OWNED BY THE LLC (SHEEP)	PRIVATE LIVESTOCK			
			SHEEP	HORSE	GOATS	COWS
	H19W2	-	50	-	-	-
18	H20	-	200	-	-	-
19	H21	-	270	-	20	-
20	H22	-	230	-	30	-
21	H23	-	600	10	100	50
	H23W1	-	10	-	-	-
	H23W2	-	10	-	-	-
22	H24	-	500	-	30	-
23	FR1	-	385	-	-	-

## APPENDIX F – PROJECT GLAC



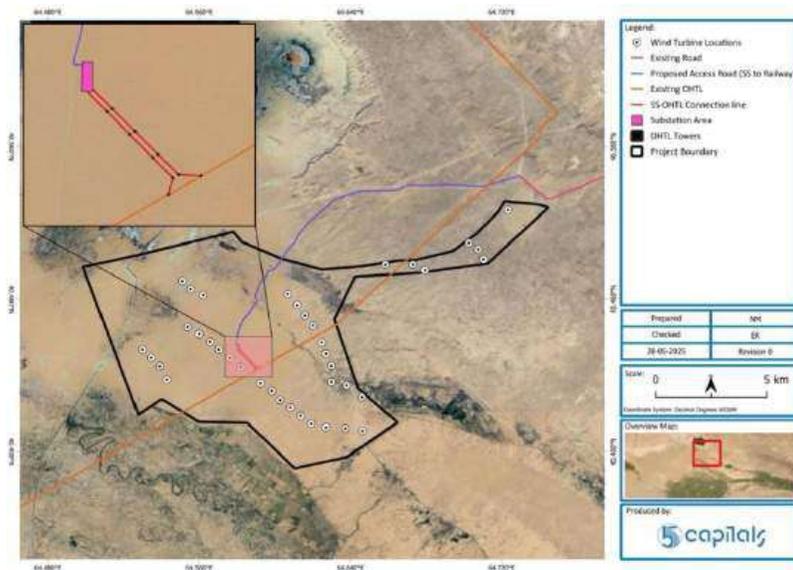
**GIJDUVON 300 MW WIND FARM**  
**GUIDE TO LAND ACQUISITION & COMPENSATION**  
**(GLAC)**

**October 2025**

This guide has been prepared to provide information on the involuntary land acquisition process to the Project Affected Persons (PAPs) and other interested stakeholders in the Project area.

## INTRODUCTION

The Gijduvon 300 MW Wind Farm Project will be developed by the 'ACWA Power Gijduvon Wind FE LLC'. The Project will be located in Gijduvon and Shofirkon districts in the Bukhara region of Uzbekistan. The Project components will include 39 Wind Turbine Generators (WTGs), sub-station that will also include an administration office, internal and external access roads, and a 1.5 km Overhead Transmission Line (OHTL) connecting to the Bash 500 MW Wind Farm – Karakul OHTL.



Gijduvon 300 MW Wind Farm  
Guide to Land Acquisition & Compensation

The construction phase of the project will also involve the establishment of temporary construction areas within the project boundaries. These areas will include storage zones, a batching plant, offices and accommodation facilities.

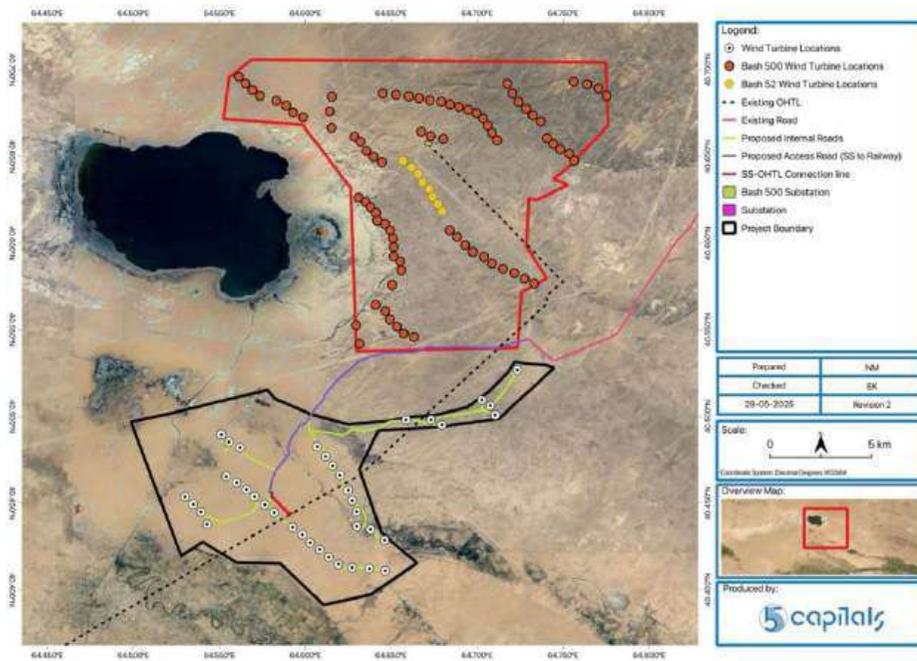
## Project Timeline

The contractor will begin early work between December 2025 and January 2026. This will include limited works and surveys related to engineering. Full construction works are planned to commence between January to February 2026. It is noted that construction will only commence once all the requirements from the Project's funding banks are met.

## Facilities to be shared between Gijduvon 300MW WF & Bash 500MW Wind Farm

The Gijduvon Wind Farm will include the construction of a 1.5 km 500kV OHTL which will connect to the Bash 500 MW Wind Farm-karakul 162 km, 500k V OHTL.

It is noted that the Bash 500MW WF has also been developed by ACWA Power under the Project Company, FE ACWA Power Bash Wind LLC'. The Bash 500 MW Wind Farm underwent a separate environmental and social impact assessment and compensation due to involuntary land acquisition was also paid. The location of the Bash 500 MW Wind Farm in relation to the Gijduvon 300 MW Wind Farm is provided in the following figure.



## PROJECT LAND REQUIREMENTS

### Minimising Displacement

- Wind Farm: The project will only impact the areas where the facilities will be constructed which will ensure that grazing is not disrupted in other areas. After construction is finished, the contractor will restore the land used for short term construction activities to what it was before. It is noted that no agricultural land will be impacted by the project.
- The alignment of the OHTL: The 1.5 km OHTL will include ten towers which are located within the same wind farm area. The permanent land impact will be based on the location of the towers and grazing

can continue under the OHTL. This will account for 0.02ha of the permanent land required for the project.

## Impacts on land and assets

### PERMANENT LAND TAKE

The wind farm components will require 117.49 ha during the operation and construction phases which accounts for approximately 0.93% of the total available grazing area within the project boundaries. However, grazing will still be possible within the areas outside of the Project facilities.

### Operational Noise Impacts

During the operation of the wind farm, noise will be generated by wind turbine generators. Based on the modelling undertaken for the Project, it has been determined that the noise generated will be higher than the noise regulations in Uzbekistan and those set by the lenders. This will impact five herders' structures and their 17 workers (See Annex A) leading to physical displacement. The structures displaced will be relocated within the Project boundaries outside of the operational noise impact zone.

### Shadow Flicker Impacts

c As a result, they will need to be relocated from the impacted area due to noise, shadow and flicker impacts (See Annex A).

Additionally, there are seven herders (some with shared structures) and a total of 26 workers who will be affected only by shadow and flicker. These herders will not need to be relocated, but their structures will need modifications, particularly to the placement of windows and doors, to mitigate the impact. A qualified Project Engineer will assist with the structural modifications, and ongoing monitoring will be conducted to assess the



effectiveness of these measures. If necessary, further corrective actions will be implemented. All the Project Affected Persons will also have access to the Grievance Redress Mechanism for the life of the Project.

### TEMPORARY LAND TAKE

The Project will require temporary land access to construct the wind farm and the OHTL. This will include:

- Temporary areas for the contractor including storage and camp. This is approximated to be 7.72 ha at the wind farm which is approximately 0.06% of the total available grazing area.
- The contractor will use land under the OHTL area to undertake construction activities. This will be the area between the towers and will include a 30m construction zone. These areas will be restored after construction to allow for grazing to continue.

### SAFETY ZONE

- **Construction phase:** The Project will implement a 250 m safety buffer zone around the wind turbine construction areas and a 30 m buffer on each side of the access roads. Grazing will be restricted within these buffer zones during the construction phase to ensure the safety of herders and their livestock, due to the movement of heavy vehicles, machinery, and assembly of the wind turbine components. Grazing will be possible in these areas during the operational phase.
  - The construction of the 500kV OHTL will cause temporary, short-term impacts during the construction phase, primarily within a 30-meter construction zone. While this area will be temporarily affected, grazing activities will resume once the construction phase is complete.
- **Operational Phase:** A Health Protection Zone of 250 m will be implemented around each WTG while a 30 m buffer zone will be implemented on each side of the 500 kv OHTL, measured from the

outermost conductor. Grazing activities can still occur in these zones but no structures can be constructed.

The breakdown of the land allocation to the different Project components is as shown in the following table.

PROJECT FACILITIES	NO. OF WTG/TOTAL KM	TOTAL AREA IN HA	TYPE OF IMPACT	TYPE OF OWNERSHIP
WTG Base (including foundation & hardstand & WTG transformer)	39	24.93	Permanent	Land lease for project lifetime
Sub-station	n/a	3.46	Permanent	
OHTL (10 tower locations)	1.5	0.02	Permanent	
Internal access road (12m)	49.3	59.02	Permanent	Lease from the municipality
Main access road from the railway line to the sub-station (12m)	18.64	22.34	Permanent	
Laydown areas (camp, storage areas etc)	n/a	7.72	Temporary	Lease from the municipality
<b>Total 117.49ha</b>				

### IMPACT ON THE FISHPOND

There is one herder who has a fishpond which is located approximately 1.2km from the nearest wind turbine. No disruption on the fishpond is expected due to the construction and operation of the wind farm. Additionally, monitoring will be undertaken during the operational phase to assess whether shadow flicker has any effect on fish production and to



determine if any corrective measures are necessary. The herder will also have access to the grievance redress mechanism.

## PROJECT AFFECTED PERSONS

The Project will affect the following persons:

- Herders grazing their livestock at the wind farm and OHTL (all found within the same Project boundaries).
  - This includes the herder with a fishpond.
- Workers employed by the herders.
- Clusters that have leases of the land where the Project components will be located.

## PROJECT REQUIREMENTS

The project will be required to follow the Uzbekistan laws relating to land and compensation for impacts on assets.

In addition, to the Uzbek laws, the Project lenders who are financing the Project also have standards that must be followed by the Project. These include:

- Asian Development Bank Safeguard Policies.
- The Asian Infrastructure and Investment Bank (AIIB): Environmental & Social Framework.

The above standards have similar requirements that include:

- Avoid involuntary displacement wherever possible, and minimise, mitigate impacts where unavoidable.
- Enhance, or at least restore, the livelihoods of all displaced persons in real terms relative to the pre-project levels.

- Improve the standards of living of vulnerable groups.
- Engage directly with affected people through meaningful consultations.
- Compensation rates must be at “full replacement value”.
- Compensation must be paid before the impact happens.
- Access to the Grievance Redress Mechanism (GRM) and judicial mechanisms.

## PROVISION OF COMPENSATION

In accordance with national and international requirements, short-term and long-term impacts on leaseholders and land users such as loss of assets will be compensated at full replacement value. This includes the market value of losses and any other transaction costs, price variation without any deductions for taxes, depreciation or materials which can be recovered.

All the affected people who have assets or structures that are impacted by the project will be entitled to compensation, irrespective of whether they have legal leases or not.

Compensation will be paid before any project activities can start.

Affected persons will have an opportunity to appeal the compensation amounts through the established grievance mechanism. Once an agreement is reached between the Project Company and the Project Affected Persons, the compensation will be paid directly to the individual's bank accounts.



## VALUATION PROCESS

The valuation process was carried out by LLC Evaluation Consulting Centre (Sirdaryo Mustakil Baholash Va Ekspertiza) who are licensed by the Republic State Committee for Privatization and Development of Competition. This was undertaken after the completion of the inventory.

The valuation process included the following steps:

- Inventory was undertaken for each herder within the Project boundaries in the presence of the Project affected household.
- The full market value of the buildings and structures determined by the cost excluding depreciation.

## Cut-off date

A cut-off date of 20<sup>th</sup> July 2024 was announced to the Project affected persons. Any new assets developed within the Project area after this date will not be considered for compensation.

## ENTITLEMENTS

All the project affected people will be entitled to support by the project based on the impacts.

- Land used for grazing: Herders will receive fodder crops or cash compensation during construction period.
- Immovable built structures: Cash compensation at full replacement cost, based on the current price of building materials in local markets, with no deductions for depreciation.

- Movable structures (trailers): Reimbursement of fuel required to move the trailer(s) to a location chosen by the Project Affected Person within the Project area.
- Relocation of movable assets (livestock equipment, pumps etc): An allowance of 5% of the full replacement cost of the movable assets to cover their relocation costs.
- Impact from shadow & flicker on accommodation structures: Modification of the affected accommodation structures affected by shadow flicker by the Project OR Monetary compensation of the Project Affected Persons for modifying affected accommodation structures based on the current price of building materials within local markets.
- Loss of employment: Monthly severance equalling the Uzbekistan minimum wage or the Project Affected Persons current salary (whichever is higher), for a transitional period of six months, or a period of disruption in case of a temporary impact on an employer.
- Significantly affected persons: One time support to significantly impacted PAPs to include the basic calculation value (UZS 375,000 x2).
- Vulnerability support: Among other support they will receive a one-time off allowance based on one month of the minimum wage in Uzbekistan (UZS 1,155,000).
- In addition to receiving compensation, all affected persons will have access to livelihood restoration initiatives as shown in the table below.

## LIVELIHOOD RESTORATION & OTHER SUPPORT

In addition to receiving compensation, all affected persons will have access to livelihood restoration initiatives and vulnerable households will also receive additional support. The livelihood restoration and vulnerability support initiatives are outlined below.

LIVELIHOOD RESTORATION INITIATIVE	TARGET RECIPIENTS	DESCRIPTION
Training on the new pastoral land law & opportunities for the Project Affected Persons	Herders & workers	<ul style="list-style-type: none"> <li>• Training on the new legal provisions and reforms under the Presidential Decree UP-15 on "Measures to Introduce Modern Mechanisms for the Protection and Rational Use of Pastures" January 2025.</li> <li>• Training on the use of the E-yaylov platform once it has been established by the Government which is expected to be by December 2025.</li> </ul>
Animal health & disease control program	All project affected persons with livestock	<p>A livestock expert will be tasked with implementing an animal health &amp; disease control program which will include:</p> <ul style="list-style-type: none"> <li>• Providing regular veterinary check-ups.</li> <li>• Vaccination program</li> <li>• Establish a disease surveillance system</li> </ul> <p>The livestock expert will also determine how the Project Affected Persons can add value and enhance the quality of their products such as milk handling, basic processing such as cheese, dried meat etc.</p>
Preferential recruitment	All project affected persons	<ul style="list-style-type: none"> <li>• Preferential employment for affected people (including vulnerable people) during the construction &amp; operational phase of the Project. All affected people will be informed about the employment opportunities and their applications prioritised based on the Project needs and qualifications.</li> <li>• The selected members will be provided with pre-employment training based on the jobs available.</li> </ul>
Vulnerability allowance	Vulnerable households only	<ul style="list-style-type: none"> <li>• Among other support they will receive a one-time off allowance based on the needs identified. This will be based on one month of the minimum wage in Uzbekistan (UZS 1,155,000).</li> </ul>



## PROJECT RESOURCES

To effectively implement the requirements of the Resettlement Action Plan (RAP), the Project will appoint the following resources:

- A Social Manager with overall responsibility of day-to-day implementation of the RAP.
- A designated Community Liaison Officer (CLO) to support the Social Manager in addressing grievances and to keep the Project Affected Persons informed about the Project progress.
- Technical specialists responsible for monitoring the progress of the RAP implementation in accordance with international best practice.

## RAP Committee

The Project will also include a Committee to support the implementation & monitoring of the RAP. The composition of the Committee will include:

- Relevant government agencies.
- The grazing clusters
- Two herders' representatives
- Two workers' representatives

## PROJECT IMPLEMENTATION SCHEDULE

The implementation schedule is provided below in Annex B below.

Gjduvon 300 MW Wind Farm

Guide to Land Acquisition & Compensation

## STAKEHOLDER ENGAGEMENT

- Consultations will be undertaken in a culturally appropriate and inclusive of all the Project Affected Households, including vulnerable groups.
- On-going stakeholder engagement including the regular disclosure of information, notifications of construction activities and participation of affected households during the disclosure of entitlements, compensation, implementation and monitoring process.
- The stakeholder consultation process will be free of interference, manipulation, discrimination, intimidation, and coercion.
- All PAPs will have access to the grievance redress mechanism.

## Grievance Procedure

The Project has developed a grievance procedure to resolve any grievances, queries, or concerns. The grievance mechanism is based on the following key process:

- Any grievance is registered and acknowledged receipt of within seven (7) calendar days of its receipt. The grievance will be investigated and responded to within 14 calendar days of the grievance being submitted.
- If the grievant is dissatisfied by the resolution provided, the grievance will be reassessed in 14 calendar days and a final decision communicated.
- If the grievance cannot be resolved at the Project level, an external mediator will be involved to help find a resolution.



- This grievance procedure does not prevent complainants from exercising their rights under Uzbekistan law, including applying to a Court of Law at any stage.
- A channel to address Gender Based Violence & Harassment (GBVH) will be put in place before the start of the construction phase and communicated to the Project Affected Persons.

COMPANY	CONTACT DETAILS
<b>ACWA Power (Project Developer)</b> Akbar Mavlonov Senior Manager – Business Development	Block-A, 13th Floor, 107-B, Amir Temur Avenue, Tashkent, Uzbekistan Email: <a href="mailto:amavlonov@acwapower.com">amavlonov@acwapower.com</a> Mob: +998 71 238 9960
<b>Project Company</b> Project Social Manager Community Liaison Officer	TBC
<b>Juru Ltd.</b> Gulchekhra Nematullayeva – Senior Social Specialist	Email: <a href="mailto:g.nematullaeva@juru.org">g.nematullaeva@juru.org</a> Mob, SMS: +998 97 445 95 04 Work: +998 71 202 04 40
<b>Juru Ltd.</b> Iroda Malikova – Social Specialist	Email: <a href="mailto:i.malikova@juru.org">i.malikova@juru.org</a> Mob, SMS: +998 77 067 55 50 Work: +998 712020440
<b>Juru Ltd.</b> Bekhruzbek Erbaev – Social Specialist	Email: <a href="mailto:b.erbaev@juru.org">b.erbaev@juru.org</a> Mob, SMS: +99893 600 96 91 Work: +998 71 202 04 40
<b>Juru Ltd.</b> Karolina Sulitanofu – Environmental Specialist	Email: <a href="mailto:k.sulitanofu@juru.org">k.sulitanofu@juru.org</a> Mob, SMS: +998 90 994 03 77 Work: +998 71 202 04 40

In addition to the project-level grievance redress mechanism provided by the project, people who are, or may in the future be, adversely affected by the project will have a range of forums available to them for purposes of raising their complaints, grievances, and concerns. These include channels to raise concerns to ADB through the resident missions and the ADB project

teams. Additionally, if complaints are not successfully resolved at the Project-level grievance mechanism, these may be directed to the lenders via the mechanisms below.

### Asian Infrastructure Investment Bank - Project-affected People's Mechanism (PPM)

Project-affected people may raise their concerns regarding the environmental and social aspects of an AIIB-financed Project with the Client and AIIB during the preparation and implementation of the Project.

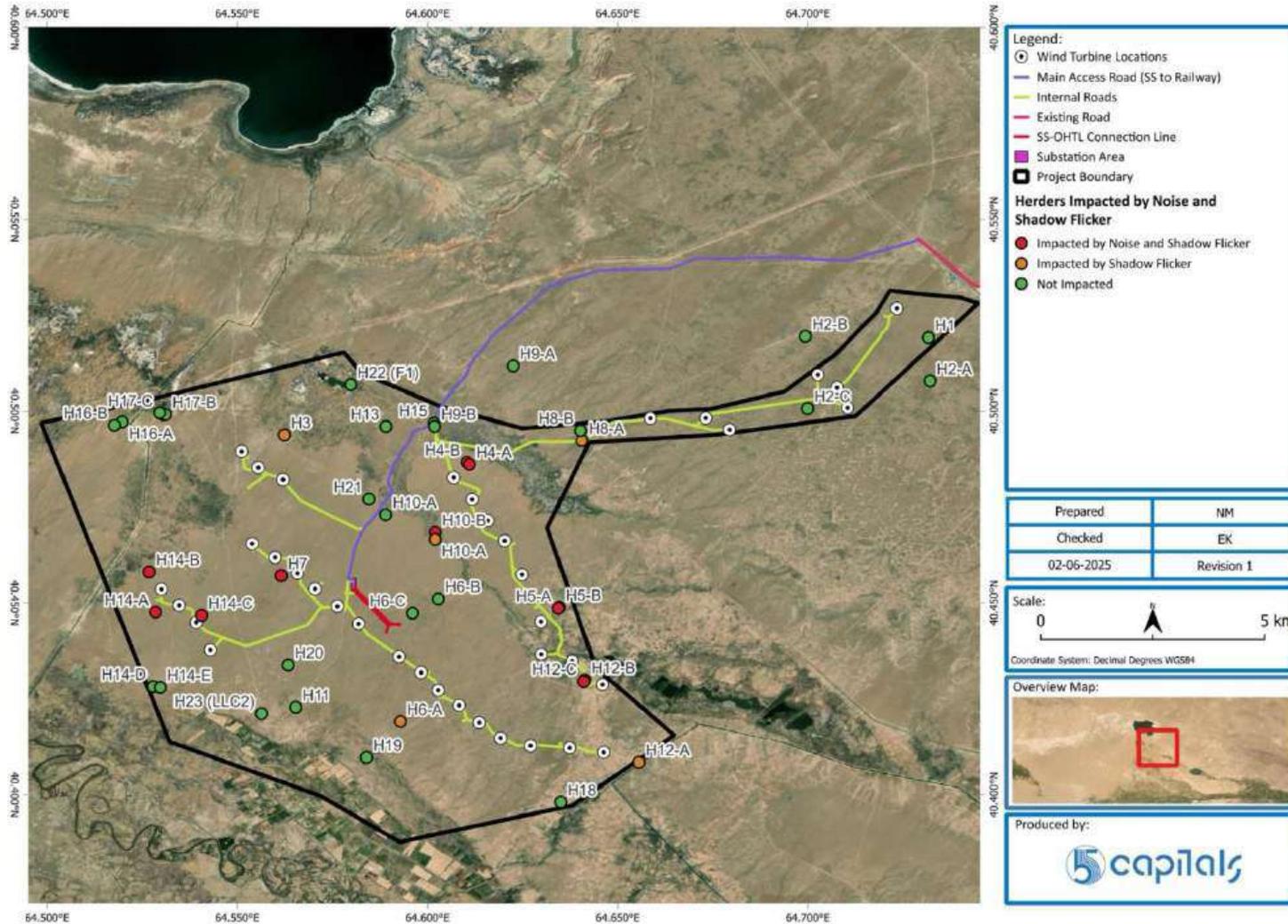
- Submissions can be made via the website below:
  - <https://www.aiib.org/en/about-aiib/who-we-are/project-affected-peoples-mechanism/submission/index.html>
- You can also contact the PPM Secretariat for guidance on how to correctly file your submission at:

Asian Infrastructure Investment Bank (AIIB)  
 Tower A, Asia Financial Center, No. 1 Tianchen East Road  
 Chaoyang District, Beijing, China 100101  
 Email address: [ppm@aiib.org](mailto:ppm@aiib.org)  
 Fax Number: +86-10-8358-0003

### ADB Accountability Mechanism

- <https://www.adb.org/who-we-are/accountability-mechanism#contact>

## ANNEX A: LOCATION OF STRUCTURES IMPACTED BY NOISE, SHADOW & FLICKER





## ANNEX B: PROJECT SCHEDULE

ACTIVITIES	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2025												2026											
Disclosure of the Entitlement matrix																								
Disclosure of individual compensation packages																								
Project Affected Persons Review of their Compensation packages																								
Signing of Compensation Agreements & payment of compensation																								
Commencement of early construction works																								
Commencement of main construction works																								
On-going engagement with the Project Affected Persons and access to the grievance mechanism																								
Livelihood restoration and monitoring																								