

KAZAKHSTAN

AKTOBE WWTP MODERNISATION PROJECT

Stakeholder Engagement Plan



July 2023

LIST OF ACRONYMS AND ABBREVIATIONS

AD	Anaerobic Digester
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
IPAM	Independent Project Accountability Mechanism
NTS	Non-Technical Summary
PR	Performance Requirements (EBRD)
SEP	Stakeholder Engagement Plan
URE	Treated effluent (reservoir)
WWTP	Wastewater Treatment Plant

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1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the proposed Wastewater Treatment Modernisation Project in Aktobe City (referred to as the 'Project' in the following). The Project is planned by JSC Aqtobe Su-Energy Group, which provides water supply, sewage, and district heating services in Aktobe City. The Project is expected to receive loan finance from the European Bank for Reconstruction and Development (EBRD).

The objectives of the SEP¹ are to:

- Outline a systematic approach to stakeholder engagement that will help Aqtobe Su-Energy Group build and maintain a constructive relationship with their stakeholders.
- Provide means for effective and inclusive engagement with Project stakeholders throughout the Project cycle.
- Ensure that appropriate environmental and social information is disclosed, and meaningful consultation is held with the Project's stakeholders and, where appropriate, feedback provided through the consultation is taken into consideration.
- Ensure that grievances from stakeholders are responded to and managed appropriately.

The SEP covers all phases of the Project:

- Scoping process, which was conducted in February-March 2023 and involved initial identification of Project-related key environmental and social issues to be considered in the Environmental and Social Impact Assessment (ESIA).
- The ESIA process, which is conducted in April-November 2023 and involves a baseline analysis (including analysis of existing data and further studies), assessment of positive and negative impacts of the proposed Project, and identification of mitigation and management measures. The ESIA process also includes a 120-day public disclosure period.
- The pre-construction and construction phase of the Project, with construction expected to take place from June 2024 – June 2027.
- The operation phase of the Project after completion of construction in 2027.

The SEP will be publicly available in Kazakh and Russian languages at the Aqtobe Su-Energy Group website and as printed copies at the Aqtobe Su-Energy Group office:

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Aktobe City
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The SEP will be subject to regular updates as the Project progresses its implementation.

¹ The objectives are from EBRD's Environmental and Social Policy, Performance Requirement 10: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

2 DESCRIPTION AND CONTEXT OF PROPOSED PROJECT

The Aqtobe Su-Energy Group plans to construct a new wastewater treatment plant (WWTP) for the city of Aqtobe on an approximately 11 ha plot of land adjacent to the existing WWTP. This plot is located approximately 5 km to the north-west of the city centre of Aqtobe.



Figure 2.1: Location of the existing Aqtobe WWTP and treated effluent (URE) reservoir, north of Aqtobe City in north-west Kazakhstan (Source: Google Earth)

The Project comprises the following key infrastructure components:

- Construction of a new WWTP based on activated sludge technology and with design capacity of 100,000 m³/day average flow and 130,000 m³/day peak daily flow (500,000 P.E.) compliant with national and EU standards for urban wastewater treatment, including modernisation of a pumping station.
- Anaerobic Digester (AD) line capacity to treat 195 tons/day of dewatered sludge (at 25% solids) via primary and secondary digestion resulting in on average 22,000 m³ biogas/day.
- A combined heat and power (CHP) facility to produce heat and electricity from biogas generated by the AD facility, with estimated approx. 66,000 kWh/day thermal energy and 50,140 kWh/day electric energy. The power generated by the CHP will be used at the WWTP site.

The Project will be implemented in line with the national and EU standards for wastewater treatment, EU requirements for sewage sludge management, EU BAT and EU taxonomy requirements for such facilities. Once implemented, the Project will also lead to a reduced level of odour.

Relocation of parts of the existing overhead power lines that are located on the Project site will also be required along the perimeter of the new WWTP. This component will be financed from the municipal budget and is considered an 'associated facility' of the proposed Project

Construction of the new WWTP is expected to start in June 2024 and to continue for 36 months. It is estimated that approximately 100 workers will be employed by the Contractor for the construction phase, while approximately 50 staff are estimated to be needed during the operation of the new WWTP.

The key areas that may be directly affected by Project activities, and thus falling within the scope of the ESIA, include:

- 1) The **WWTP site** (including relocation of overhead power lines) where direct physical impacts can occur such as removal of vegetation and change in land-use.
- 2) **Areas used for sludge management and disposal**, including the existing sludge beds and the backfilled borrow pit, which is used for long term disposal of dried sludge.
- 3) **Main roads to and from the WWTP site**, where heavy transport can be a source of impacts.
- 4) **Villages and other inhabited areas** in the vicinity of the WWTP site where, e.g., odour could be felt.
- 5) **Waterways** downstream from the WWTP, where treated effluents are discharged and impacts on water quality may be felt, including the **URE retention reservoir**, the **9 km creek bed leading from the reservoir to the Ileik River**, and the **Ileik River itself** (considered approximately 500 m above and below the discharge point of the creek to the river). There is also a bypass channel which allows for bypassing the URE, if necessary. The URE discharge channel to the Ileik River and the Ileik River are only directly affected from around March 20th to May 5th when discharge is released from the URE.

The social setting of the Project in terms of residential areas, population, and distance to WWTP operations is set out in the table below.

Table 2.1: Residential areas relatively close to the proposed new WWTP

Settlement	Distance to WWTP
Railway Junction 39 and Tulpanny hamlet	2 km north of the WWTP
Georgievka village	10 km north of the WWTP
Kurayly village	10-11 km north of the WWTP
<i>Temir Tulpar Batys LLP farm</i>	Fields are 0-9 km from the WWTP
<i>Aterra LLP farm</i>	Fields are 0-27 km from the WWTP
<i>Nan farm</i>	Fields are 0-39 km from the WWTP
<i>ANDI LLP farm</i>	Fields are 2-10 km from the WWTP

Furthermore, the JSC Aktobe Chromium Compounds Plant is located 1 km south of the new WWTP area, while several other industries are located 3-6 km from the WWTP.

The area of wider Project influence includes all parts of Aktobe City where the benefits of the WWTP will be felt, such as economic opportunities associated with employment during the construction phase and improved wastewater treatment after the new WWTP is operational.

The above key features are reflected in the figure below.

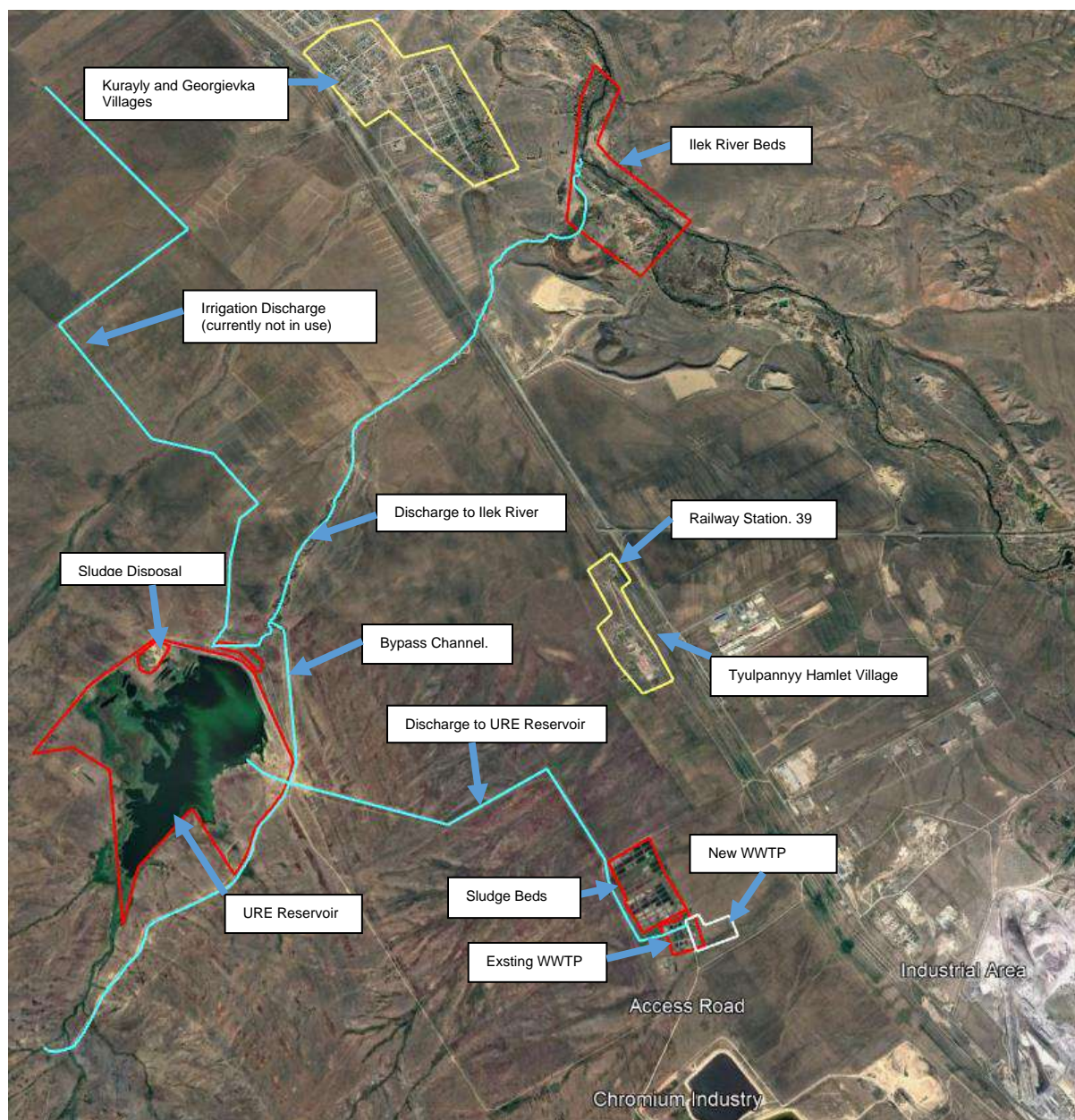


Figure 2.2: The ESIA study area of the proposed WWTP project, consisting primarily of the existing and new WWTP sites, sludge management sites, the discharge pipe from the WWTP to the URE retention reservoir, the URE retention reservoir and the open discharge channel from the reservoir to the Ilek river, the Ilek river 500 m above and below the discharge point, farms and villages in the vicinity of the Project (nearest villages marked with yellow lines). (Map source: Google Earth)

3 NATIONAL REGULATORY REQUIREMENTS

Procedures for consultations with the public, disclosure of information and grievances relevant for this Project are covered under the existing Kazakh legislation, particularly the Law on Access to Information of November 16, 2015, with amendments as of January 12, 2023. This law regulates public relations arising from the realization of the constitutional right of everyone to freely receive and disseminate information in any way not prohibited by law. Access to information is based on the following principles: legality;

openness and transparency of the activities of information owners; reliability and completeness; relevance and timeliness; equal access to information; non-disclosure of state secrets and other secrets protected by law; inviolability of private life, personal and family secrets; observance of the rights and legitimate interests of individuals and legal entities. The procedures are also informed by the Convention on the Access to Information, the Public Participation in Decision Making and the Access to Justice in Environmental Matters (the Aarhus Convention), which Kazakhstan ratified in 2000.

As stated in Article 73 of the Environmental Code, a National Environmental Impact Assessment (EIA) requires publicly disclosure for 30 calendar days on governmental websites. The public disclosure period is to include one public hearing meeting. An announcement about the place and time of the public hearing meeting is to be made in Kazakh and Russian in at least one newspaper and through at least one TV or radio channel. This announcement shall be made at least 20 days before the public meeting. Comments and suggestions can be submitted during the meeting and through the governmental website(s) and e-mail.

4 OTHER REQUIREMENTS

EBRD's Performance Requirement on Information Disclosure and Stakeholder Engagement (PR 10) is to be fulfilled, and the current Stakeholder Engagement Plan is formulated in accordance with this. As stated in PR10, Category A projects (like the current Project) require that a formalised, participatory disclosure and consultation process is built into each stage of the ESIA. This involves incorporating into the decision-making process the views of affected parties on matters that affect them directly. Documents prepared as part of the ESIA for public sector projects are to be publicly disclosed for 120 calendar days. The ESIA documents are to be kept in the public domain throughout the life of the project, which for this Project is the responsibility of Aqtobe Su-Energy Group. The company is also to provide regular reports on environmental and social performance to stakeholders. These reports are to be disclosed at least annually.

Further details on PR10 are included in EBRD's Environmental and Social Policy, which can be found on: <http://www.ebrd.com/environmental-and-social-policy.html>.

Minutes or summaries of stakeholder meetings and discussions will be publicly disclosed as part of the ESIA report.

5 STAKEHOLDER ENGAGEMENT DURING SCOPING PHASE

The identification of key stakeholders started during the scoping process and are listed in the stakeholder analysis presented in chapter 6 below. These include but are not limited to residents living in villages and settlements relatively close to the existing and the proposed new WWTP. During the scoping phase, attempts were made to identify spokespersons for the following villages and settlements: Railway Junction 39 and Tulpannyy hamlet, Georgievka village, and Kurayly village. This was, however, not possible as they have no village-level administrations or other official representatives. Three individual eco-activists from Aktobe City did, however, join the stakeholder meeting on 24 February 2023.

The following stakeholder meetings were held during the scoping phase:

- 1 February 2023: Kick off-meeting between Aktobe Su-Energy Group and the consultants conducting the scoping process and the subsequent ESIA, with discussions about the ESIA process and work schedule.
- 15 and 21 February 2023: Meetings with Aquarem, with discussions about the contents and time schedule for the national Feasibility Study and the national EIA.

- 24 February 2023: Meeting with the following stakeholders: Energy and Communal Department of Aktobe Region, Deputy Akim of Aktobe City, Zhaik-Caspian Basin Inspection, Department of Natural Resources and Regulation of Use of Natural Resources, Sanitary and Epidemiological Control Department, three individual eco-activists and Aktobe Su-Energy Group.

Sludge management for the existing WWTP and the planned new WWTP as well as complaints about odours from the existing WWTP were the main topics discussed during the meeting on 24 February 2023. The complaints of odours were reported to come from settlements located relatively close to the existing WWTP. It was agreed as important to involve residents from these settlements in future consultations on the proposed new WWTP. The minutes of the stakeholder meeting are included in the ESIA Report.

A simple media search was conducted during the scoping phase to determine whether any relevant issues regarding the Project, Client or Beneficiary have been reported through the media. This media search identified several published articles regarding odour from the WWTP and the city's sewage system, and the high pollution level of hydrogen sulphide.

6 IDENTIFICATION OF KEY STAKEHOLDERS

As mentioned in chapter 5, the identification of key Project stakeholders started during the scoping phase. This continued during the ESIA process. The two sections below present an overview of the identified key stakeholders.

6.1 Community-level stakeholders

The table below lists community-level stakeholders, particularly those that live relatively close to the WWTP.

Table 6.1: Community-level stakeholders

Community-level stakeholders	Population	Distance to proposed WWTP
Residents in the settlements of Railway Junction 39 and Tulpanny hamlet	158	2 km north of the WWTP
Residents in Georgievka village	1,828	10 km north of the WWTP
Residents in Kurayly village	1,859	10-11 km north of the WWTP
Temir Tulpar Batys LLP farm		Fields are 0-9 km from the WWTP
Aterra LLP farm		Fields are 0-27 km from the WWTP
Nan farm		Fields are 0-39 km from the WWTP
ANDI LLP farm		Fields are 2-10 km from the WWTP
JSC Aktobe Chromium Compounds Plant		Located 1 km south of the new WWTP area
Residents in Aktobe City		Other residents in Aktobe City than those mentioned above are located relatively far away from the WWTP.

Discussions with residents in the Railway Junction 39 and Tulpanny hamlet, Georgievka village, and Kurayly village during the ESIA process indicate that the most important priority for them is the elimination or reduction of unpleasant odours from the existing WWTP.

The JSC Aktobe Chromium Compounds Plant is located next to the access road and may experience minor disturbance due to construction traffic, while no other impacts are foreseen.

There is currently no reuse of sludge from the Aktobe WWTP for agricultural purposes. However, with the improved quality of the effluents there is an opportunity for local agricultural re-use of sludge for farms located between 0 and 5 km to the north-east from the WWTP, primarily the two (2) farms of Temir Tulpar Batys and Andi. During a telephone call, the owner of Temir Tulpar Batys indicated that he is interested in using treated sludge from the planned new WWTP as fertiliser. Attempts were also made to contact other farmers, without success.

Residents in Aktobe City more generally are also key stakeholders, as they will benefit from the improved wastewater treatment resulting from the Project and may also benefit from the employment opportunities occurring during the construction phase.

6.2 Key state, regional and city departments

Important state, regional and city departments for this Project include:

Table 6.2: Important regional and city departments and their roles in relation to this Project

State, Regional and City Departments	Role in relation to Project
State Departments	
Zhaik-Caspian Basin Inspection	Compliance with legislation, e.g., on approvals related to the Ilek river.
Bureau of National statistics	Collecting and compiling statistics on, among others, population and socio-economic aspects.
KazHydromet	Statistical information about air quality, data from Hydropost.
Aktobe City Police Department	Collecting information about, among others, traffic safety and accidents.
Akimat for Aktobe Region	
Energy and Communal Department of Aktobe Region	Compliance with legislation, e.g., on approvals.
Department of Natural Resources and Regulation of the Use of Natural Resources	Compliance with legislation, e.g., on approvals for Maximum Permissible Concentrations for atmosphere air.
Regional Centre for Research, Restoration and Protection of Historical and Cultural Heritage	Registering and listing cultural heritage, approval to build new WWTP.
Department of Agriculture and Land Relations	Compliance with legislation, e.g., on approvals.
Department of Statistics of Aktobe Region	Collecting and compiling statistics on, among others, population and socio-economic aspects.
Department of Sanitary and Epidemiological Control	Registering and monitoring water and sanitation related diseases.
Akimat for Aktobe City	
Department of Housing and Communal Services, Passenger Transport and Highways	Aqtobe Su-Energy Group, a 100% state-owned enterprise, reports to the Aktobe City Akimat through this department. Compliance with legislation, e.g., on approvals.
Department of Sanitary and Epidemiological Control	Registering and monitoring water and sanitation related diseases.
Department of Agriculture and Land Relations	Compliance with legislation, e.g., on approvals.
Department of Land Management	Discussions and agreement with one farmer about relinquishing his user right to 2.2 ha of land, which is to form part of the proposed new WWTP site.

The Akimats of the two districts of Aktobe City, Almaty District and Astana District, have supported the arrangement of focus group discussions during the ESIA process (see below) and are expected to support Aqtobe Su-Energy Group with organisation and announcement of public meeting(s) during the public disclosure of ESIA documents.

7 STAKEHOLDER ENGAGEMENT DURING ESIA PROCESS

7.1 Data collection from city and regional departments

During the ESIA, data were collected from many departments in Aktobe City and Aktobe Region, including many of the departments mentioned in section 6.2. above. These data, as well as data from Aqtobe Su-Energy Group, are included in the baseline sections of the ESIA report and provide insights to the impact assessment contained in the same report.

7.2 Community-level stakeholder engagement

7.2.1 Stakeholder meeting in Kurayly village in March 2023

A meeting was held on 27 March 2023 with participation of four residents of Kurayly village, Almaty District Akimat of Aktobe City, Aqtobe Su-Energy Group, and the Consultant conducting the ESIA.

The Aqtobe Su-Energy Group explained the plans for the new WWTP. The four residents participating in the meeting supported the plans, expressing their hopes that the current foul odour from the discharge of wastewater would disappear. Foul odour was also mentioned as a problem for residents at the railway junction 39 and the Tulpanny hamlet.

7.2.2 Focus group discussion in April 2023

Three focus group discussions (FGDs) were held in April with residents living relatively close to the existing WWTP, i.e., in Kurayly and Georgievka villages and at railway junction 39 / Tulpanny hamlet. The table below provides characteristics of the participants in the three FGDs.

Table 7.1: Overview of FGDs

No	FGD participants	Description
1	FGD with 7 women from Kurayly and Georgievka villages.	Participants were from both low-income and middle-income households and included young women with children and elderly women. Participants lived relatively close to the creek / Ilek river.
2	FGD with 8 men from Kurayly and Georgievka villages.	Participants were from both low-income and middle-income households and included young men with children and elderly men. Participants lived relatively close to the creek / Ilek river.
3	FGD with 11 women and 1 man from the railway junction 39 / Tulpanny hamlet.	Participants were from both low-income and middle-income households and included both young participants with children and elderly participants.

There were reported to be no poor families in the villages and settlements mentioned above, while there are some people with different types of disabilities in Kurayly and Georgievka villages.

The unpleasant smell from the existing WWTP was highlighted both by women and men in the three FGDs. They experience a strong smell especially during the summer and in windy weather. In these periods, they did not want to open their windows, their laundry had to be dried inside their houses, and some were embarrassed to invite guests. The smell from the WWTP was reported to have a negative impact on residents generally in the villages/settlements and particularly on people with respiratory diseases and on children.

FGD participants hoped that the construction and subsequent operation of the new WWTP would lead to the disappearance of the strong and unpleasant smell from the existing WWTP. Participants in Kurayly and Georgivka villages also hoped that village residents can bathe freely in the river in the future and that it will be possible to use river water for irrigation. Several people in the mentioned villages and settlements were expected to be interested in employment during the construction of the new WWTP.

The following were the preferred communication channels mentioned for future information about the proposed new WWTP:

- The District Akimats in Aktobe City.
- The WhatsApp groups in the villages/settlements.
- Social media (Instagram and Facebook).
- Community activists.
- The community council (Kurayly and Georgivka villages).
- The veteran council (Kurayly and Georgivka villages).

There was much interest in participating in future consultation meetings concerning the new WWTP. As there is no public house, school, or other administrative buildings in the railway junction 39 / Tulpanny hamlet, there was a request that transport should be arranged for residents from this settlement to participate in consultation meetings in Kurayly village.

7.2.3 Consultation concerning relinquishing the user right to land for the new WWTP site

2.1 ha of the land for the new WWTP site is currently under lease by the owner of the farm Temir Tulpar Batys LLC, as is 1 ha of land that will be required for relocation of overhead power lines from the site of the new WWTP. In 2019, the farmer was granted the user right for 49 years for the agricultural plot 02-036-164-435, which is 100 ha. The farmer is allowed to use the land for agricultural production and has in recent years used the land for hay harvesting.

Aqtobe Su-Energy Group in cooperation with the Aktobe City Land Management Department has consulted the farmer and the three parties have signed an agreement dated 2 July 2023 on a change of the boundaries of plot 02-036-164-435, withdrawing a total of 3.1 ha from the lease agreement and providing replacement land of same quality to the farmer.

7.3 Public disclosure and consultation

In accordance with EBRD requirements for a Category A project, the public disclosure process will take place over a 120-day period during July-November 2023.

The following documents will be disclosed during this period:

- ESIA report for the Project
- Environmental and Social Management Plan (ESMP) for the Project
- Non-Technical Summary of the ESIA Report and the ESMP
- Environmental and Social Action Plan (ESAP) listing corporate actions to be taken by Aqtobe Su-Energy Group
- Stakeholder Engagement Plan (SEP) for all phases of the Project (this document)

The above-mentioned documents will be available in English, Kazakh and Russian at the website of Aqtobe Su Energy Group: <https://aqtobesuenergy.kz/ebrr/> and as printed copies at the Aqtobe Su-Energy Group office (see address in chapter 11). Printed copies can also be made available upon request in EBRD Resident Offices in Almaty, Astana and Aktobe.

- EBRD Satellite Office in Aktobe, 173/1 Sankibay Batyr Avenue, Progress Business Centre, office 301, Aktobe City.
- EBRD Resident Office in Astana, 2 Dostyk Street, SAAD Business Center, 10th floor, Astana City.
- EBRD Resident Office in Almaty, 41 Kazybek Bi Street, Park Palace Business Centre, 3rd entrance, 3rd floor, Almaty City.

During this period, the public and other stakeholders will have the opportunity to provide comments on the mentioned ESIA documents. Comments can be provided during two planned public meetings:

1. A public meeting at the head office of the Aktobe Su-Energy Group in August 2023. This meeting is expected to cover both the national EIA and the ESIA documents mentioned above.
2. A public meeting in July or August 2023 in Kuraily village, which will provide easy access for communities and other stakeholders in the vicinity of the proposed WWTP. This meeting will cover the ESIA documents mentioned above.

The public meetings will be arranged with the purpose of giving residents and other stakeholder groups an opportunity to discuss and provide feedback on the mentioned documents. The meetings will involve a presentation based on the Non-Technical Summary of the ESIA Report and the ESMP. This will include an overview of the continuous stakeholder engagement through all phases of the Project, as explained in chapter 1 above. The meetings will be held in Kazakh and/or Russian, as relevant. Minutes of the public meetings will be available in Kazakh and Russian at the website of Aktobe Su Energy Group.

Written comments to the ESIA documents can also be provided through the e-mail address of Aktobe Su-Energy Group, and by delivering or sending them to the head office of the company. Contact details are included in chapter 11 below.

Aktobe Su-Energy Group will provide information about the above-mentioned ESIA documents and the venues and time of the public meetings at least 20 days before the meetings. Such information will be provided through the company's own website, social media, WhatsApp groups, the two district Akimats of Aktobe, and the mass media. Both women and men will be encouraged to attend the public meetings and comment on the documents.

Following the disclosure period, activities during this period as well as comments received from the public and other stakeholders and the Consultant's responses to these will be summarised in a Consultation Report. The ESIA documents will be amended based on the feedback during the public disclosure and submitted to EBRD and the Aktobe Su-Energy Group for final approval. The final ESIA documents will be available in Kazakh and Russian languages at the website of the Aktobe Su-Energy Group.

8 STAKEHOLDER ENGAGEMENT DURING THE PRE-CONSTRUCTION AND CONSTRUCTION PHASE

8.1 Disclosure of information

Aktobe Su-Energy Group will, before the start of construction, provide information to the community-level stakeholders mentioned in section 6.1 above. The main contents of this information are outlined in the table below. Information will be distributed in all areas of Aktobe City, with particular focus on the villages and settlement within relative proximity of the new WWTP.

The initial information will be distributed through press releases and brochures (the latter mainly in the villages and settlements relatively close to the construction site) with contents as those outlined in the table below. Information on the Project, the time schedule, and opportunities for public comments will also be posted in local newspapers in Kazakh and Russian languages. In addition, information will be available upon request.

Table 8.1: Outline contents of project information

Headings	Outline content
Main organisations	The Aqtobe Su-Energy Group is the organisation overall responsible for the design and construction activities as well as the subsequent operations. In line with this, Aqtobe Su-Energy Group is responsible for stakeholder engagement and communication activities during design, construction, and operations.
Main Project investments	A new WWTP, as described in chapter 2 above.
Estimated timeframe for construction of new WWTP	June 2024 – June 2027
Areas to benefit / be affected	All areas of Aktobe City
Opportunities and benefits	<p>The main benefits are:</p> <ul style="list-style-type: none"> • An estimated 500,000 residents will benefit from access to a fully functional WWTP. • Some reduction in water and sanitation related diseases and associated improved living conditions. • A functioning WWTP will be a major improvement compared to the current WWTP and will reduce odour levels. • Employment opportunities during the construction phase, with recruitment by the selected construction contractor(s).
Impacts during construction due to Project activities and expected notification of mitigation actions to be applied	<p>Announcements on temporary interruptions of the wastewater services, if any (if any interruptions, they are likely to only be when transferring from the old to the new WWTP).</p> <p>Furthermore, information about stakeholder engagement activities and the community grievance mechanism to be provided.</p>
Announcement of planned public hearings when the draft detailed design is available	<p>Announcement about public hearing meetings should be published in Kazakh and Russian 20 days in advance. This should include a description of the public hearing process in the context of the Project, including:</p> <ul style="list-style-type: none"> • Place and time of the public hearing meetings. • Time frame: 20 days for provision of comments, complaints, and proposals from the public. • Time frame: 1 month for authorities to react and consider complaints and proposals.
Review and approval of the Project	<ul style="list-style-type: none"> • A description of the final review process by other external authorities and approval of the Project. • Time frame: 3 weeks for review.
General grievance procedure during construction	<ul style="list-style-type: none"> • Description of the grievance procedure • Organisation to contact: Aqtobe Su-Energy Group Aktobe-City Tel.: +7 7132 562772 E-mail: office@aqtobesuenergy.kz Website: https://aqtobesuenergy.kz/
Local and site-specific information	Local and site-specific information will be distributed through the two districts of Aktobe City, WhatsApp groups, and cooperatives of apartment owners. The mentioned organisations can also contact Aqtobe Su-Energy Group for additional local and site-specific information.

The table below shows how information will be disclosed.

Table 8.2: Means of Disclosing Information

Institution Responsible	Means of Information Disclosure	Target groups
Aqtobe Su-Energy Group	<ul style="list-style-type: none"> • Brochure with contents as described in the previous table • Stakeholder Engagement Plan • Non-Technical Summary • Announcement in local newspapers, in Kazakh and Russian languages, with the same overall contents as in the brochure 	Residents (women and men) in the Railway Junction 39 and Tulpannyy hamlet, Georgievka village and Kurayly village.
Aqtobe Su-Energy Group in cooperation with the two district Akimats of Aktope City	<ul style="list-style-type: none"> • Distribution of brochure in public places in the Project area including for example schools and shops. • Information through public consultation meetings. • Response to local inquiries. 	Farmers with fields close to the new WWTP: Temir Tulpar Batys LLP, Aterra LLP, Nan farm, and ANDI LLP.
Aqtobe Su-Energy Group	<ul style="list-style-type: none"> • Prior to construction, notification of the start of construction, e.g., through WhatsApp groups and social media), including contact telephone number for Aqtobe Su-Energy Group for emergencies or grievances. 	JSC Aktope Chromium Compounds Plant
Aqtobe Su-Energy Group	<ul style="list-style-type: none"> • Overall contact point for information during implementation of the Project and on request distributor of information on progress of work as described in approved reports and minutes of meetings. • During construction responsible for structured responses to grievances (see section on grievance procedures) 	All stakeholders

8.2 Public consultations

The public consultation during the pre-construction and construction phase will be a continuation of the consultations that took place during previous phases of the Project. It will especially build on the experience from the consultations that took place during public meetings in July-August 2023 as part of the public disclosure of draft documents from the ESIA process.

It is expected that two public meetings will be held in the same locations as during the public disclosure period for draft ESIA documents in 2023:

1. A public meeting at the head office of the Aqtobe Su-Energy Group.
2. A public meeting in Kuraily village to ensure easy access for communities and other stakeholders in the vicinity of the proposed WWTP.

The meetings will be held in Kazakh and/or Russian, as relevant. The specific dates and places for the public meetings, with presentation of details of the detailed design of the new WWTP, will be decided when the draft detailed design is available, and this SEP will subsequently be updated. The public meetings will be arranged with the purpose of giving residents and other stakeholder groups an opportunity to discuss the Project and provide feedback at the design stage where adjustments can still be made. At these hearings, all types of project-related questions and proposals can be raised. This may

include questions related to the future tariffs for wastewater services. If beneficial, follow-up public meetings may be held.

Aqtobe Su-Energy Group will provide information about the venues and times of the public meetings. Such information will be provided through the company's own website, social media, WhatsApp groups, the two district Akimats of Aktobe, and mass media. Both women and men will be encouraged to attend the public meetings and comment on the detailed design presented during the meetings and/or provide written proposals and comments.

The conclusions of the public meetings will be agreed during the meetings and recorded. Minutes of public hearing meetings will be published on the website of the Aqtobe Su-Energy Group within 7 days of the meetings. All justified comments and proposals will be addressed and incorporated into the final design before submission to relevant authorities for approval.

9 STAKEHOLDER ENGAGEMENT DURING THE OPERATION PHASE

Aqtobe Su-Energy Group provides information on a variety of topics during its current operations. The company will provide additional information about the operations of the new WWTP when construction is complete, and it is put into operation. This will, among others, include the following topics:

- The operations of the new WWTP.
- The benefits of the new treatment processes compared to those of the old WWTP.
- Potential tariff increases due to the investments in a new WWTP.
- Information on the environmental and social performance of Aqtobe Su-Energy Group, including in relation to the operations of the new WWTP (to be provided annually).

The following are the main communication channels currently used by Aqtobe Su-Energy Group:

- Through WhatsApp groups established at district/local level.
- Social media, such as Facebook, Instagram, and Telegram.
- Television.
- Newspapers: Aqtobe Su-Energy Group has an agreement with local newspapers to bring articles about their work and plans.
- The website of Aqtobe Su-Energy Group: www.aqtobesuenergy.kz
- Information on the entrance doors to apartment buildings.
- Participation in quarterly public meetings organised by the Akimat; these meetings are held in different parts of the city according to a one-year schedule.
- Own public meetings on specific topics or in a specific geographical area, e.g., due to grievances received.

The above and/or similar communication methods will be used during the operations phase of the new WWTP.

10 PUBLIC GRIEVANCE MECHANISM

10.1 Public grievance mechanism during pre-construction and construction phase

For the purposes of this Project, Aqtobe Su-Energy Group has a specific grievance mechanism for any concerns and complaints to be handled in a systematic way, which is in accordance with the stipulations

of the Law on Grievances Handling procedures № 221-III, 12.01.2007, as well as the requirements of EBRD.

During the construction phase, all communication on grievances from the public will be channelled through Aqtobe Su-Energy Group, which will handle all grievances that may arise during the construction works such as about noise, dust, and traffic problems.

The person(s) responsible for grievances at the construction site will be determined by Aqtobe Su-Energy Group. The responsible person(s) will be trained on the implementation of the procedures. To keep track of the grievances about the work of the contractors, a handbook will be opened with a column where the contractor's name will be noted together with the recorded complaint and the date of receipt. Grievances will be sent directly to the contractors in written form, and they will be asked to give written information to Aqtobe Su-Energy Group about the status of the problem within seven days. The issues will also immediately be discussed with the contractor representatives in informal meetings to speed up the process. Contractors' response and actions taken along with reasons will be recorded in the handbook together with the dates. The complainants will be informed about the proposed corrective action, or it will be clarified why action is not required or possible within 15 days.

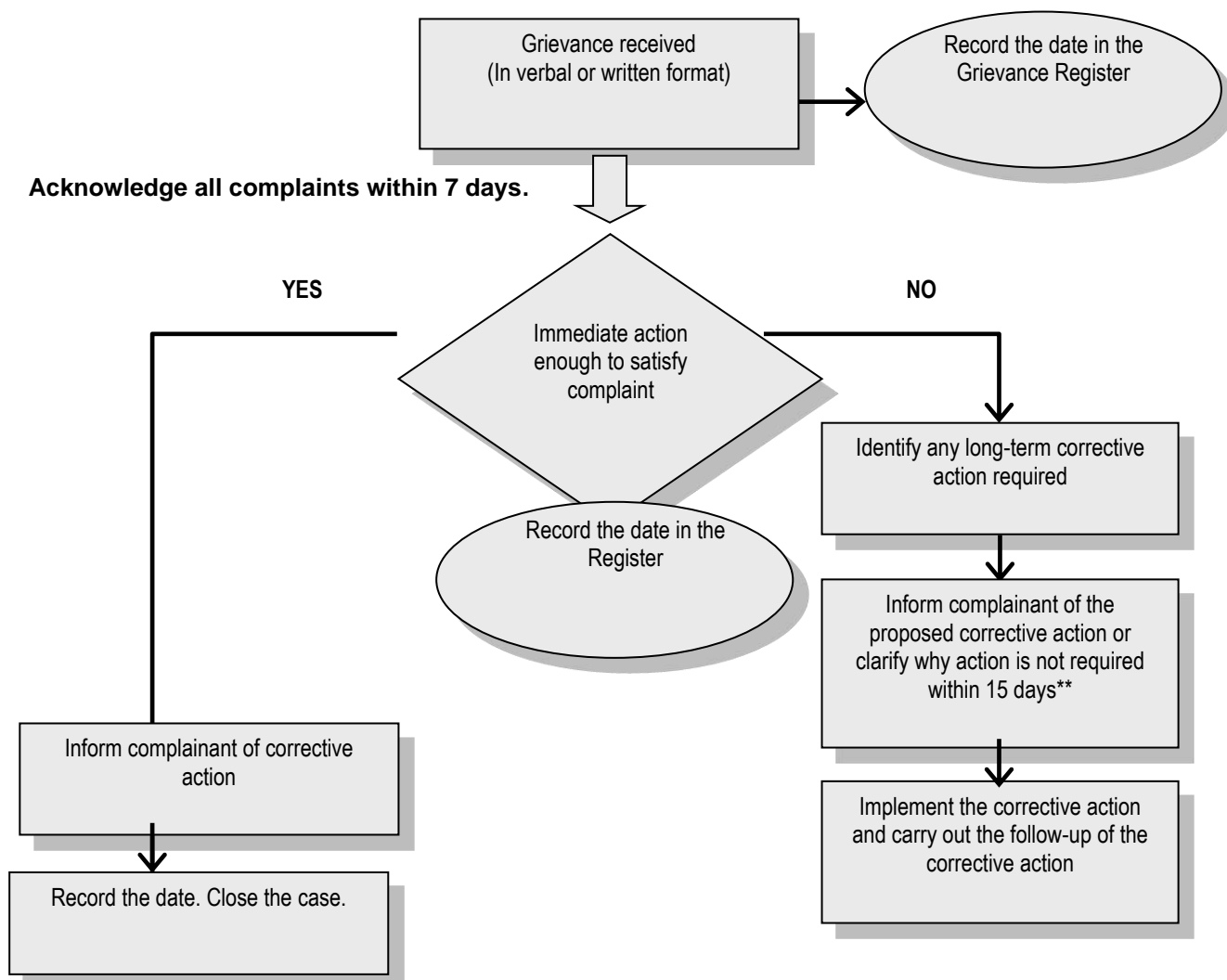
Aqtobe Su-Energy Group will require contractors to provide a grievance mechanism for their workers, enabling them to report any grievances they may have at their workplace. However, the grievance mechanism operated by Aqtobe Su-Energy Group will also be open for the contractors' workers to use, e.g., in situations where complaints have not been attended to by the contractors or where the workers might fear retaliations if they were to complain to the contractors as their employer. At the start of the different contractors' work, Aqtobe Su-Energy Group will inform the contractors' workers about the grievance mechanism operated by Aqtobe Su-Energy Group and provide the name and contact details of the contact person. Aqtobe Su-Energy Group will ensure that it is easy for workers to submit their possible grievances through its contact person, who will ensure transparent feedback without any retribution. If the workers wish so, their complaints will remain anonymous. Workers will be encouraged to submit complaints in writing, but they can also be submitted orally to the contact person of Aqtobe Su-Energy Group.

The public grievance mechanism is to be applied as described in the figure below. All grievances will be registered, along with the status of the investigation into the problem and its resolution, as appropriate. Keeping the timeframes for response to complainants, as shown in the figure, will be the criteria used to assess whether the grievance mechanism is implemented successfully.

10.2 Public grievance mechanism during operation phase

Aqtobe Su-Energy Group has a mechanism for complaints related to their services. It will strengthen this mechanism, based on the experience of implementing the mechanism described above for the Project construction phase.

Flowchart for Processing Grievances*



* Aqtobe Su-Energy Group will improve its registration of grievances at the start of the Project and appoint units to be responsible for the different actions in this flow chart.

** Depending on the type of grievance, this deadline might be extended with an additional 30 days.

Figure 10.1: The Grievance Procedure

For each case of grievance, a record sheet shall be filled in either by the complainant in cases where the complainant appears personally at the Aqtobe Su-Energy Group office or when receiving a complaint by phone, e-mail, social media, post or through the Aqtobe Su-Energy Group website. Aqtobe Su-Energy Group will review the public grievance form included below before the start of the Project.

Public Grievance Form

It is possible to submit an anonymous grievance. If you wish to submit an anonymous grievance, you should not submit your contact information. Submitting an anonymous grievance means you will receive no response to your grievance.

Reference No:	
Name and Surname	
	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail _____
Preferred Language for communication	<input type="checkbox"/> Kazakh <input type="checkbox"/> Russian
Description of Incident or Grievance:	
What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to:

Aqtobe Su-Energy Group

Aktobe-City

Tel.: +7 7132 562772

E-mail: office@aqtobesuenergy.kz

Website: <https://aqtobesuenergy.kz/>

10.3 EBRD's Independent Project Accountability Mechanism

In addition to project level grievance mechanism managed by Aqtobe Su-Energy Group, the EBRD's Independent Project Accountability Mechanism² (IPAM) is an independent complaint process available to stakeholders, where the project level grievance mechanism fails. The IPAM aims to facilitate the resolution of social, environmental, and public disclosure issues raised by the project-affected people and civil society organisations about EBRD financed projects and if resolution is not possible, then initiate compliance review to establish whether the Bank's Environmental and Social Policy was complied with.

11 CONTACT INFORMATION

Aktobe Su-Energy Group is responsible for stakeholder engagement during all phases of the Project, including the scoping process, the ESIA process, the pre-construction and construction phase, and the operation phase. The relevant contact information is:

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² <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>