

Social Compliance Audit

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Total Eren Access M-KAT Solar Power Project (Kazakhstan)

Prepared by EcoSocio Analysts LLC.

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**M-KAT SOLAR POWER PLANT
SOCIAL COMPLIANCE AUDIT**



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ABBREVIATIONS AND CURRENCY CONVERSION

ADB	Asian Development Bank
CSR	Corporate Social Responsibility Program
EBRD	European Bank for Reconstruction and Development
ESAP	Environmental and Social Action Plan
HSE	Health Safety and Environment
HVL	High voltage line
JSC	Joint Stock Company
ILO	International Labour Organization
OVOS	Environmental Impact Assessment based on Russian standards
PCP	Public Communications Policy
PR	Performance Requirement of the EBRD Environmental and Social Policy
SEP	Stakeholder Engagement Plan
SPP	Solar photovoltaic power plant
SPS	Safeguard Policy Statement
SR	Safeguards Requirement

For financial figures an exchange rate KZT335/\$ is used in this report

1 EXECUTIVE SUMMARY

The European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB) are considering providing financing to M-KAT Green LLP for the construction and operation of a 100 MWac Solar photovoltaic power plant M-KAT(SPP) in Zhambyl Region. The project will be implemented by SPV M-KAT GREEN LLP (the Company). Of the 500 hectare leased land, 489 ha will be fenced to accommodate nearly 401 760 sun-tracking PV panels, 32 inverters and 32 substations that are connected to the high voltage substation from where a 12km 220kV powerline will run to a transit national network substation. An open switch unit will be constructed at this substation.

The Project has been categorized as the category B on environment, C on Involuntary Resettlement, and C on Indigenous Peoples. This social compliance audit has not identified issues that would require livelihood restoration planning. However, to enable the local community to rip some benefit from the project, the Company was asked to develop of the Corporate Social Responsibility Program (CSR). The environmental and social assessment confirmed that impacts are site specific and short term in nature and that the Project is structured to comply with the EBRD's Performance Requirements and ADB's Safeguard Policy Statement (SPS) and other social requirements.

Involuntary resettlement is not expected since the 500-hectare land leased in May 2017 for 49 years by the Shu District Council for the solar power plant is a vacant State land not allocated to any entity. A graveyard and irrigation channel were within the initial land allocation plan, but these areas have been carved out and excluded in the final land allocation to avoid displacement impacts. Lands for the powerline and access roads was leased by the Shu District Council for 49 years, and 0.5 hectare unused land for the open redistribution unit was purchased by the project from the State in June 2018. The nearby Alga village is mostly inhabited by Kazakh and the remaining minorities do not meet the ADB SPS criteria to be considered as indigenous people under SR 3 on Indigenous Peoples.

Worker accommodation is not an issue as practically all the workers are expected to be local and travel to work daily. The Company and its contractors will comply with the national labor laws and will take measures to comply with the core labor standards. The project benefit will be more apparent on the regional level when reduction in energy deficit will allow further economic development, especially for local industries and creation of new jobs. Few jobs will be created for the local unskilled labour but presence of the SPP may lead to knowledge transfer and encouragement of the targeted education among the local school graduates. Communication with the project stakeholders will be maintained. A stakeholder engagement plan has been prepared describing the approaches and activities with the different stakeholders including the nearby communities, local leaders and civil society organizations.

Given the need to improve social dialogue and allow for some benefits from the project to be felt by the local community a Corporate Social Responsibility Program that would include both financial as well as other forms of support will be developed. It is envisaged that an initial lump sum for local investment and then on-going annual support to community actions will be provided.

2 BACKGROUND

The Project aims to provide sustainable and environmental and socially friendly source of renewable electrical energy for the region. The plant is to be located to the west of Shu town and to the south of Alga village. The 500ha land plot allocated for a solar power plant was leased in May 2017, and the 10m x 3.7km access road and 16m x 12km powerline corridors have been leased by the Shu District Council to MKAT for 49 years on 14 June 2018. The 0.48-hectare open redistribution unit area has been acquired for ownership from the State for 28 224 KZT according to Order #201 from June 12, 2018. For the powerline route, agreements with 5 land tenants (4 local farms and an Almaty based company) have been

achieved through one off payments, a permit to cross the irrigation channel, and confirmation from the other utility companies that their utilities are not affected by the project have been obtained. Only one farmer has recently developed part of his and the neighbour land (48ha) to grow fodder. The other land has not been used or developed by the tenants. Except for the lands where the power line poles footing (approximately 1m² each pole) will be installed, the tenants may continue to use the lands for future crop cultivations but not for building structures and planting trees. Lease of the power line route was finalized between MKAT and the Shu district council on 12 June 2018. The SPP land does not contain crops, trees, buildings, cultural and archaeological objects and recreational areas.

The construction is planned to last for 12 months. Maximum of 400 assembling workers, office and service staff will be needed for this period, of them 50 are engineers. After the commissioning, six specialists will maintain the power plant, three cleaners, and three will guard it in 12-hour shifts. About 6 people will be employed as solar panel cleaners.

The Project is not expected to affect the nearby farmers, there are no physical displacement and no expected economic displacement hence involuntary resettlement is not foreseen, and there are no indigenous peoples within the project site and nearby communities.

3 LEGAL AND INSTITUTIONAL REQUIREMENTS

3.1 LENDERS' REQUIREMENTS

3.1.1 EBRD

According to the EBRD classification the project corresponds to category B. The relevant requirements to the project are Environmental and Social Policy Performance Requirements 1-6, 8 and 10. PR7 (Indigenous Peoples) is not relevant because there are no indigenous people present. PR8 (Cultural Heritage) is not relevant because the power plant area does not contain objects of archaeological or cultural significance and fencing does not obstruct access to such objects. PR9 does not apply to the project because no financial intermediaries are involved.

3.1.2 ADB

ADB Safeguard Policy Statement (2009) Safeguards Requirement (SR) 2 on Involuntary Resettlement aims to avoid involuntary resettlement wherever possible; to minimize involuntary 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 covers physical displacement (relocation, loss of residential land, or loss of shelter) and economic displacement (loss of land, assets, access to assets, income sources, or means of livelihoods) as a result of (i) involuntary acquisition of land, or (ii) involuntary restrictions on land use or on access to legally designated parks and protected areas. It covers them whether such losses and involuntary restrictions are full or partial, permanent or temporary. ADB SPS SR 2 does not apply as involuntary resettlement is not expected since the land is a vacant State land with no land users. A graveyard and irrigation channel were within the initial land allocation plan, but these areas were carved out and excluded in the final land allocation to avoid displacement impacts. The located 550m north of the site Alga village is mostly inhabited by Kazakh and the remaining minorities do not meet the ADB SPS criteria to be considered as indigenous people under SR 3 on Indigenous Peoples.

SR3 on Indigenous Peoples¹ aims to design and implement projects in a way that fosters full respect for

¹ The term Indigenous Peoples is used in a generic sense to refer to a distinct, vulnerable, social and cultural group possessing the following characteristics in varying degrees: (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the project area and to the natural

Indigenous Peoples' identity, dignity, human rights, livelihood systems, and cultural uniqueness as defined by the Indigenous Peoples themselves so that they (i) receive culturally appropriate social and economic benefits, (ii) do not suffer adverse impacts as a result of projects, and (iii) can participate actively in projects that affect them. It is triggered if a project directly or indirectly affects the dignity, human rights, livelihood systems, or culture of Indigenous Peoples or affects the territories or natural or cultural resources that Indigenous Peoples own, use, occupy, or claim as an ancestral domain or asset.

SR4 requirements were applied during allocation of land. Social due diligence or social audit has been conducted on land procurement. The audit report assessed and confirmed that there are no physical or economic displacements impacts, and no impacts on ethnic minorities or indigenous peoples.

The stakeholders' engagement is to be carried out in accordance with the ADB SPS (2009) which requires meaningful consultation with affected people. Meaningful consultation is a process that (i) begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle; (ii) provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people; (iii) is undertaken in an atmosphere free of intimidation or coercion; (iv) is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups; and (v) enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues. The Project will engage with communities, groups, or people affected by projects about the impacts and the management measures. Furthermore, ADB's Public Communications requires the client to provide relevant environmental, resettlement, and indigenous people information to affected people in a timely manner, in an accessible place and in a form and language(s) understandable by them.

The ADB's Social Protection Strategy (2001) covers five major elements including labour market policies, social insurance programs, social assistance and welfare service programs for vulnerable groups, micro and area-based schemes to address vulnerability, and child protection. The Social Protection Strategy promotes improvement in employment, which is the major source of economic support for most workers and their families. It highlights the need to mitigate the employment risks by providing income support in the event of illness, disability, work injury, maternity, unemployment and old age. ADB's Social Protection Strategy requires that ADB Borrowers and their contractors and sub-contractors comply with applicable national labour laws in relation to the Project, and take measures to comply with the core labour standards.

The Policy on Gender and Development (1998) aims to ensure that gender issues are considered at all appropriate stages of the project cycle and to explore opportunities to address some of the new and emerging issues for women, as well as build the capacity of women through conducting various trainings and workshops.

3.2 KAZAKHSTAN'S LEGAL FRAMEWORK

In Kazakhstan state-owned land can be leased to legal entities. Most leases are on a long-term basis for a maximum of 49 years. Provision of land plots for legal entities for temporary use is the responsibility of the district council that is empowered to distribute the land. The main applicable law regulating land allocation process is the Land Code of the Republic of Kazakhstan. Article 48 states that for the energy projects land plots that are in the State Reserve (usually the land not suitable for traditional agriculture or

resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the dominant society and culture; and (iv) a distinct language, often different from the official language of the country or region. In considering these characteristics, national legislation, customary law, and any international conventions to which the country is a party will be taken into account. A group that has lost collective attachment to geographically distinct habitats or ancestral territories in the project area because of forced severance remains eligible for coverage under this policy.

pasturing) can be provided without tenders or auctions. There are no separate legislative requirements in regards to land acquisition for the powerline anchor towers or poles. The district council is responsible for reserving and providing land plots for the renewable energy sources (RES) projects in accordance with the Law "On supporting the Use of RES" #165-IV dated July 4, 2009.

Once allocated for the project, the land plot designation has been changed by the Shu district land management office from the State Reserve to 'for photovoltaic solar power plant construction'. Procedures for determining of the lease cost are described by the Republic of Kazakhstan Government Resolution No. 890 on Establishment of Base Payment Rates for Land Plots 2003 and the Tax Code 2008. According to these laws, the Central Land Management Office and the Shu District Council is to determine the lease rates by using the categories of the land utilitarian value like arable irrigated or non-irrigated, pastures, wasteland etc.

4 COMPANY PRACTICES

4.1.1 Stakeholder Engagement

The project drafted a Stakeholder Engagement Plan to which reflects the strategy and approaches on engaging with the project stakeholders including the nearby village and communities, local leaders, government agencies, civil society groups and workers. The Company plans to employ a full-time Community Liaison Officer (CLO) to comply with the EBRD and ADB requirements. The CLO will implement the Stakeholder Engagement Plan, coordinate the preparation of the corporate social responsibility program (CSR), and assist in implementing the grievance redress mechanism. To this time, the consultant sociologist handles the responsibilities of CLO. The project information board at the Alga central shop, rural area council and SPP site are planned to contain information on the project, employment mechanism and labor rights, grievance mechanism and a box for grievances accordingly.

Table 1 EBRD Performance Requirements and ADB Safeguards Requirement compliance status. MN-material non-compliance, PC-partial compliance, FC-full compliance, NA-not applicable for the project.

EBRD PR / ADB SR	Score	Comment/Gaps	Recommendation
EBRD PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement/ ADB SR 2 Involuntary Resettlement			
Summary: The 500ha of the SPP site is allocated to the project out of 8100ha of the State Reserve and unused by the land tenants land used for daily pasturing of the Alga south herd. A part of the allocated land is suitable for pasturing only in Spring and early Summer. The access to the rest of the pasture land has not been obstructed but the passage distance has increased from 5.5 to 6.8km. Access to the pasture for the west herd and Sauytbek herds has not been affected. With regard to the powerline, out of 5 land tenants affected by splitting their land plots and reduction in the area in favour of the 16m wide powerline corridor, only 48ha of Amina Farm non-irrigated arable land may be affected if construction is conducted above the seeded winter crops. All five tenants will be able to use the original land with the only restriction of the capital structures installation in the powerline corridor. All the five tenants have received the one time compensation to release a part of their leased land and have signed an agreement with the Shu District Office. Lands for the access roads were leased by the Shu Land office for 49 years, and 0.5 hectare unused land for the open redistribution unit was purchased by the project in June 2018.			
Avoid or minimise displacement and compensate for it	Risk of PC	A graveyard and irrigation channel were within the initial land allocation plan for the solar power plant, but these areas were carved out and excluded in the final land allocation to avoid displacement impacts. The land plot is free from any structures or economic activities and used only for non-intensive pasturing in Spring and early Summer Land Deeds obtained to all project components. Affected existing tenants along powerline agreed on their land deeds alteration and one time compensated for lost land. No physical or significant economic displacement for the 5 tenants. The five tenants to obtain their revised lease documents from the Land Management Office. Kazvodkhoz has permitted the powerline to cross Kuygen canal, other utility companies	Assist the 5 tenants obtain the amended lease/land deed from the land management office for free. Project to monitor and include in the Annual Environment and Social Monitoring report.

EBRD PR / ADB SR	Score	Comment/Gaps	Recommendation
		confirmed to have no utilities along the powerline route.	
Consultation and grievance mechanism	FC	2 public hearings on the project were conducted. No concerns were raised regarding the 500-hectare State reserve land allocated for the solar power plant. Five tenants affected by the re-allocation of the land for powerline have been consulted, compensated and their consent obtained. Four public entities have also been consulted and have provided permission. There are no outstanding grievances related to the powerline.	
Compensation, assistance and benefits for displaced persons	FC	For the powerline route, agreements with 5 land tenants have been achieved through one off payments. CLO will monitor number of cattle and cost of herding in Alga south herd to identify vulnerable to reduction in pasture group if any. Assistance may be provided through the CSRSP.	
Social impact assessment	Risk of PC	<p>The 500 hectare leased land plot for the solar plant is free from any structures, economic activities or residents. Restricting access to pasture in Spring will not affect Alga south herd but CLO is to check this through the herd monitoring.</p> <p>All the five tenants have received the one time compensation to release a part of their leased land and have signed an agreement with the Shu District Office. 5 tenants will be able to use the original land with the only restriction of the capital tower structures installation in the power-line corridor. Land released from the original lease was less than 10%.</p> <p>Access to the road by 4 current users may be affected during its upgrade construction.</p>	<p>It needs to confirm or otherwise that payments were made in line with PR5 requirements/national laws.</p> <p>If panels cleaning is required, consider employing local women and Alga village families, which in the course of the CLO monitoring are identified as having been affected by displacement of their cattle from the SPP area</p>
Resettlement planning	NA	Resettlement is not required because the land allocations did not cause physical or significant economic displacement.	
Negotiated land acquisition	FC	Land Deeds obtained to all project components according to Land Code of the Republic of Kazakhstan, affected existing tenants along powerline agreed on their land deeds alteration and compensated for lost land. As the land leased by farms is state land, the Land Committee determined the total compensation based on future lost benefits.	
ADB Safeguard Policy Statement and Public Communications Policy			
Summary: Permanent qualified CLO is to be appointed			
Worker grievance mechanism	FC	Included in the SEP grievance mechanism is expected to be implemented as part of contractual obligation to implement ESAP	
Stakeholder engagement plan and grievance redress mechanism	Risk of PC	SEP and grievance mechanism may not be implemented properly without designated CLO	Employ designated CLO and Implement SEP. Grievances received will be addressed through the established GRM and process for each grievance will be documented.
Information disclosure	FC	Two public meetings conducted in Shu and Alga with two advanced public notices. Participants approved project.	
Consultation and participation	Risk of PC	Consultation might not be arranged and participation not ensured without designated CLO	Appoint a full-time CLO and implement SEP
Monitoring and reporting	Risk of PC	Grievances may not be analysed and CSRSP criteria might be overlooked	Analyze received grievances and given answers at the end of each month and monitor spending CSRSP funds according to the set criteria
Unanticipated impacts	Risk of PC	Impact on the south herd cattle owners may be identified in the future by CLO	Monitor cattle numbers and cost of herder services in the South herd
Special considerations for indigenous peoples	NA	No indigenous peoples identified in the project area	
ADB SR 3 Indigenous Peoples			

EBRD PR / ADB SR	Score	Comment/Gaps	Recommendation
Summary: No communities which meet ADB and EBRD's criteria to be considered as Indigenous Peoples. Area inhabited by more than 90 well integrated nationalities and ethnic groups			
Indigenous Peoples	NA	No indigenous peoples identified in the project area	
ADB SR1 Environment and Social Protection Strategy			
Labour and Working Conditions	Risk of PC	Overall compliance expected but rented worker accommodation may not meet the requirements	If temporary accommodation is used, the plan should follow the IFC/EBRD Worker Accommodation Guide-lines (Appendix 1) and national sanitary standards.

4.1.2 Corporate Social Responsibility Program (CSR)

The Company will develop a CSR for its operational sites in collaboration with the with the local community's Public Governance Council and includes the action plan and allocated budget for a year. The financial assistance for local needs that the Company provided as part of the CSR does not comply with the criteria for CSR Program funding, which are:

1. Action cost fits the allocated to the CSR budget and accounts for other needs;
2. Action does not overlap with the State programs;
3. Action benefit is sustainable;
4. Action benefits the local community and is not biased to a particular group or person.

5 SCOPE OF LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT IMPACTS

In 2015, the Project applied for a selection and allocation of a land for a proposed solar power project in the Shu. The Shu District Land Office has identified an area of about 500-hectare state reserve land as a potential site for the project, based on their inventory of land in the area. The land was never leased or allocated to any person or entity since the independence from the Soviet Union. A Site Selection Act was approved by the Shu District Land Office in 2015 which allowed MKAT to conduct feasibility studies on the proposed land site for 3 years. After 2 years, in 2017 the Company applied for the leasing of about 500 hectares for the solar power project. The final land use of 500 hectares for the project will carve out and exclude a graveyard and an irrigation channel (which were within the initial land allocation plan for the solar power plant) to avoid displacement impacts. In May 2017, the lease agreement was finalized which leases the land to the project for 49 years. The lease rate of land plots is based on the land cadastral value and will be paid on annual basis. The land certificate was obtained by the project on June 2017 (Table 3).

Involuntary resettlement is not foreseen as the 500-hectare SPP area is poorly vegetated grassland with a portion that is used only in spring and beginning of summer. The pasturelands for west herds will not be affected. And south herd will still have access to their pastures with the exception of increase in passage distance from 5.5 to 6.8km. The locals consider non-intensive husbandry as hard and risky business with marginal profit and would readily change to a proper job or intensive husbandry with the livestock being kept indoors. The livestock is kept by many in two adjacent villages and in the suburbs of Shu but the numbers are relatively small and increase is only natural. Traditional non-intensive husbandry is developed as the villages enjoy unusually high availability of the State owned pasture land around them. Free range horses have not been observed on the SPP territory but further south where the Alga south herd is taken. There is no hunting or gathering conducted in the area.

Assessment of the historic, current and perspective use of land around the SPP suggested no impact to the other land users now and in the future. Historically, the site supported marginal agriculture with high labour expenditure for bringing water in. With the increase in the labour value, it is highly unlikely that the old rice pads found in the old river course depressions will be re-established. Significant increase in

irrigation water availability is not expected as the water flow of the Shu River is regulated throughout its length and revamping agriculture upstream is likely to take any extra water available. As non-intensive husbandry is risky and brings marginal profit, it is likely that the livestock that uses the area will not increase significantly. Efforts are likely to be focused on more profitable non-pasturing intensive husbandry and fodder growing on the fields where the existing irrigation system can be maintained at low cost. Effect of the SPP fence on available pasture area is evaluated for the operation. As construction is planned to be started in autumn when the site will still not be fenced, no impact on the pasturing is expected. Later in the year the livestock will not be let out. No additional land to the SPP fenced area will be used during construction. During the next autumn season when construction is ongoing and up to completion and the SPP fence is up, involuntary resettlement is still not foreseen. The 489-hectare SPP fence area is poorly vegetated grassland that is used only in spring and beginning of summer. The pastures for west herds will not be affected. And south herd will still have access to their pastures with the exception of increase in passage distance from 5.5 to 6.8km. The locals consider non-intensive husbandry as hard and risky business with marginal profit and would readily change to a proper job or intensive husbandry with the livestock being kept indoors. The livestock is kept by many in two adjacent villages and in the suburbs of Shu but the numbers are relatively small and increase is only natural. Traditional non-intensive husbandry is developed as the villages enjoy unusually high availability of the State owned pasture land around them.

The 16m x 12km powerline corridor and 10m x 3.7km access road have been leased for 49 years from the Shu District Council. The open redistribution unit 30x160m area (equivalent to 0.48 hectare) has been acquired for ownership from State Reserve. For the powerline route, there are 5 private land tenants who are using the land (**Table 3**). In 2017, the project applied for allocation of land for the power line. Only one Amina Farm has recently developed part the land and the neighboring land (48ha) to grow winter fodder. Two poles that are planned to be placed on this plot will compact ground along the powerline corridors and at the poles in a cross-like pattern with 10-15m long and 3-9m wide hands. The poles installation is expected in autumn, hence the farmer will be notified to postpone cultivation and planting of seeds in the areas until the poles are set.

With advice from the Shu District Council, the MKAT Company in 2017 contacted the five land tenants to consult and negotiate release of a portion of their State leased land needed for the power line. Agreements with 5 land tenants (4 local farms and an Almaty based company) have been achieved through one off payments. The agreement to release a portion of the required land was signed by the 5 tenants with the Shu District Council. An amended lease will be issued to the 5 tenants by the Shu Land Management Office for free reflecting the adjusted size of the land lease and other arrangements. The project will monitor that the amended lease will be issued to the 5 tenants.

Signed approval has been received on March 1st 2017 from Kazvodkhoz LLP to cross Kuygen canal and from 4 entities that confirmed that they do not have any utilities on the leased and acquired land plots. These are Kazaktelekom PLC, Shu Town and Shu District Regional Electrical Network, Shu District Council Department of Housing and Utilities Municipal Transport and Automobile Roads and the Managing Company of Special Economic Zone Chempark Taraz JSC.

A 3.7km access road will be built on State reserve land from the A358 on its entry to Shu along the existing field road used by three farms and a mechanical base. The road crosses the Levoberezhnyy Irrigation Canal and the unused underground pipeline. All the allocated for the solar plant land will be fenced with a 2.1m high wire mesh fence with a gap underneath for small animal passage. Leveling earthwork will not be required. Excess ground from the cable trenches will be used to fill dry irrigation channels and shallow depressions. Three main internal roads will be paved and inter-panel roads compacted with chip rock. The panel polls will be driven into the ground with tractor mounted pneumatic hammers. Then panels and other equipment assembling, cables lying and wiring will start. Welding and painting is not expected to be needed as almost all components will be prefabricated requiring only

assembling. Concrete foundations will be made only under the HV area transformers and buildings and substations.

To avoid the 147ha land plot designated for another 50MW solar plant, the powerline will run at the right angle for 1km before turning towards the KEGOK substation. One main turn is made on the line to minimise the number of the land plots it has to cross. With the Kuigen canal and chemical plant railway spur crossing, six-seven anchor foundation towers are expected to be needed with the associated earthwork. Holes for the polls will be drilled with minimum damage to the ground around them.

The 10m x 3.7km access road construction corridor is occupied by the existing field road used by 3 farms and mechanical base. No restriction of their access to the road is expected. The 16m wide powerline corridor and the 0.48 hectare of the open redistribution unit is used by 2-4 herds from adjacent villages and recently by Amina Farm for fodder growing.

The Company has received land deeds on SPP site, powerline route, access road and open switch unit. The new open switch unit will be built next to the existing KEGOC substation on the State Reserve land that has been taken by the Company into ownership. This and the arrangements for leasing the main plot and the powerline and road corridors have been conducted in full compliance with the Kazakhstan Land Code requirements, which states that the State Reserve land can be leased to legal entities for a maximum of 49 years. The district council that is empowered to distribute the land, ensured that the Company followed the land allocation process: Once the surveys and public consultation have been completed, the land management plan was submitted to the district council Land Management Office with the application for 49 years lease. After the Office positive decision on the land, the documents were sent to the Technical Inventory Bureau for registration. The Bureau issued the lease contract which is then registered in the Ministry of Justice.

5.1 SOCIO-ECONOMIC AND CULTURAL CHARACTERISTICS

5.1.1 Zhambyl Region

The 144 300km² Zhambyl Region is located in the basin of Shu and Talas rivers. It borders with Karatau mountain ridge in the West, Kirgiz ridge in the South and Shu-Ili mountains in the East. The North of the Region adjoins Betpakdala Desert. There are 10 districts and 4 towns: Taraz, Sarysu, Talas and Shu. With more than 90 nationalities and ethnic groups the region is dominated by Kazakh (72.6%) (Table 3). Majority of migrants are from Uzbekistan, Most of the newcomers arrive in search of employment opportunities and are mainly hired for construction, agricultural work and retail at the local markets.

5.1.2 Shu town

Shu is the largest settlement next to the SPP Site. The town is inhabited by 36 115 people. It was established in 1928 as a Turkestan-Siberia railway station. It is now a major junction with the railway (and especially the locomotive repair depot) being the major employer. The other large employers line sugar and milk products plants have shut down. As unemployment is high, many use the town bazaar to earn living. People come from district center – Tole bi village to sell here generating income for private taxi drivers and hotels. The property and catering market is also vibrant in town for this reason. Despite high competition for the consumer and low income, food prices are comparable to those in Almaty.

Table 3 Zhambyl Region ethnic composition

Ethnicity	Quantity	%
Kazakhs	811323	72,6
Russians	111203	9,9
Dungan	57245	5,1
Turks	33841	3,0
Uzbeks	28063	2,5
Kurds	15263	1,4
Azerbaijanians	12580	1,1
Kyrgyzs	10356	0,9
Tatars	8881	0,8
Koreans	8777	0,8
Germans	4346	0,4
Ukrainians	2961	0,3
Uyghurs	2800	0,3
Chechens	2231	0,2
Greeks	992	0,1
Tajiks	726	<0.1
Belorusians	409	<0.1
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The 32 000km² Shu River valley has sufficient water, fertile land and warm climate – ideal conditions for agriculture but because the irrigation system is in dire condition, much of the land is not used. Wild cannabis grows on 4 000km² of the valley (the World Drug Report, 2006). The irrigated areas are used for growing beet root, water melons, corn, sunflower and grains. Kazakhstan has a program for revamping and upgrading the irrigation system.

The town has well developed facilities: 6 entertainment centers, a cinema theater, two hospitals and a day clinic, 6 kindergartens and 11 schools. Utilities include running water at each house but despite being on the Shu River and availability of water meters, water is in short supply. Wastewater is collected from all public buildings and most of the houses. A new wastewater treatment plant with treated water checks and domestic waste landfill has been established 2.5km south of the SPP site near the powerline route. Natural gas has become available 4 years ago but some houses cannot afford to be connected (\$1800) and use electricity for cooking and charcoal for heating (\$300/year).

The closest objects to the SPP site is the Shu wastewater channel that touches the southeast corner of the substation area and goes further to the new sewage treatment plant with treated water lagoons 200m east of the powerline route. A mechanical base located 1.2km east of the site is in dormant condition. These facilities and a small farm 1.8km east will benefit from the SPP access road.

5.1.2.1 Alga and Sauytbek (Alga 2) Villages

With its 301 houses, Alga village is the center of Alga rural area includes 5 villages with 3 588 inhabitants (1 841 men and 1747 women). Out of them 1 682 are economically active of which 1005 are employed. Others are considered to be self-employed. Only two are registered as unemployed. There are 540 retired, 54 disabled and 87 women are in maternity leave. Out of 819km² of the rural area only 19km² are irrigated by Kuigen, Asha, Lugovoy, Zhaysan and Kylshaly canals. The irrigated fields are used to grow mainly fodder and in much lesser scale sugar beet, potato, fruits and vegetable. Small private business includes production of foam, concrete blocks, windows and milk products.

Only Alga village with 112 houses is located near the SPP site (565m) but Sauytbek and Alga is viewed as one community. Alga has a mosque, day clinic for 20 patients a day and post office. Sauytbek has new public house for 100 seats, library and a small first aid room. Two schools (for 100 and 274 pupils) teach in Kazakh only. Despite young adults migration to Shu and other cities, high birth rate ensures rapid growth of the population of which practically all are Kazakh of Kapshak tribe. There are few oralmans families that returned from Karakalpak region of Uzbekistan and some from Iran and China. At the time of the assessment they could not be located but the interviewed specialists of the rural area council, two school directors and the chairman of the Public Governance Council stated that they came some time ago, received \$20 000 settling-in allowance, do not have any difficulties and are fully integrated in the local community. Reportedly, they know the legislation and are represented in the local governing bodies.

The main sources of income are the agriculture, intensive husbandry, State jobs and jobs in private companies in Shu and elsewhere. Traditional non-intensive husbandry is developed as the villages enjoy unusually high availability of the State owned pasture land around them. About 37% of the houses keep some livestock. However, due to high competition at the market place from the increasing number of intensive husbandry farms, high financial risk related mainly to the cost of the livestock medical treatment, income from such husbandry is marginal. As a result, the residents keep as much livestock as they can manage themselves without external help. Despite the presence of the State assistance to agriculture in obtaining low interest and interest free loans, only one out of 5 interviewed traditional husbandry farmers took a small loan to buy livestock. The non-intensive husbandry farmers have more livestock and may employ an assistant.

A typical house in Alga would keep 1-2 cows, 0-50 sheep and goats and 0-2 horses. Only few interviewed had up to 6 cows, 200 sheep and 8 horses. This livestock is collected each morning by four herders (two for each village) and taken to four directions: mainly to the northwest but also some to the south in Alga

and mainly to the north and west but also to the southeast in Sauytbek. The herds usually have 60-80 cows and 200-2000 sheep and goats. Two small herds (~50 cows and 300 sheep each) move towards the SPP area daily from Shu. Horses are let out by themselves. Herds of 18-25 horses has been noted 1 and 7km south of the SPP site along the powerline route. To prevent damage to fodder crops around Sauytbek, the village horses movement is restricted by hobbling. The SPP area is used mainly until early summer before the grass withers and the irrigation channels dry out. The grass south of the site along the powerline becomes progressively lasher as the route falls into the Kuragaty River plain. Here, a herd of 160 calves from Sauytbek was found.

Milk, some milk products and meat are sold wholesale to the dairy plant 100km away and less to the Shu food market. The Alga residents have about 0.3ha gardens each, where most of them grow vegetables and plant trees. Water comes from two channels that pass from Kuigen Canal: one through Sauytbek and one through the SPP site. The channel water is insufficient to irrigate the surrounding the village land. Sauytbek area takes water from the same channel but is closer to it. Water is sufficient to harvest fodder crops like medic, clover and barley 3 times in a season. Smaller Sauytbek is therefore orientated to fodder retail than to the non-intensive husbandry.

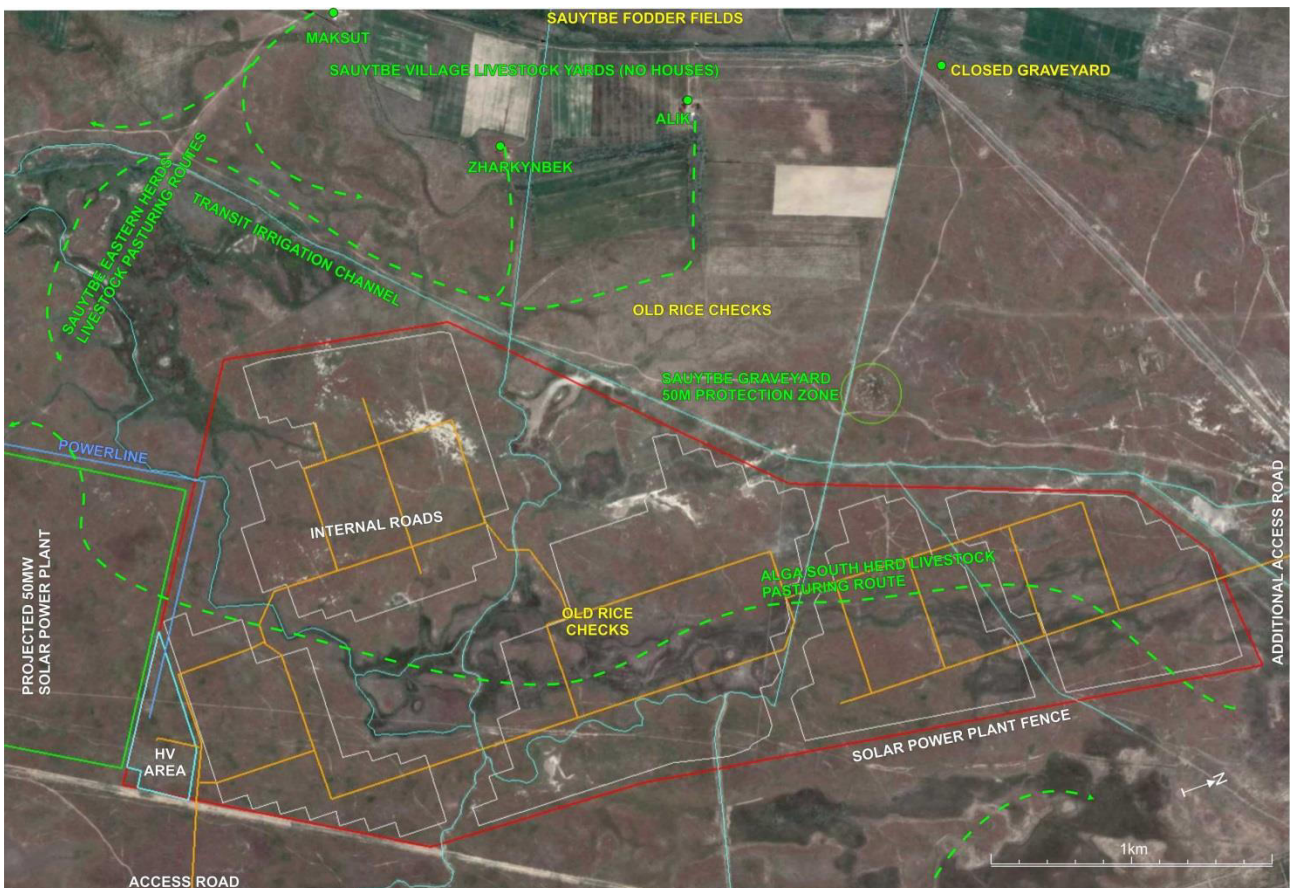


Figure 1 Overview map. Project components are written in white. Social constraints are shown in green. End of arrows indicate the pastures location.

Karakalpak region of Uzbekistan and some from Iran and China. They are fully integrated in the local community. Reportedly, they know the legislation and are represented in the local governing bodies.

5.4 ENGAGEMENT WITH STAKEHOLDERS

The consultation with stakeholders is in full compliance with the Republic of Kazakhstan requirements. Application for the land was submitted to the Shu district council in 2015 which redirected it to its Land Management Office. In 2015, the Office reviewed availability and issued a 3-year lease to conduct land surveys with the requirement to conduct public consultation. A public note was sighted in the local newspaper Shu Dolina two weeks before the first meeting in Shu Cinema Park Entertainment Center on 9 March 2016. The meeting was attended by the town council representative, the designer, EIA developer and the project managing company representative conducted the meeting. It was stated that the feasibility study was to be available for examination by the public. After the project presentation, no questions or comments arose and the attendees voted unilaterally for the project.

The second meeting was conducted on 28 April 2017 in Alga village school hall. It was attended by 42 residents and lead by the same representative of the town council with the presence of the Alga councilor and the project managing company representative. Without much discussion, questions or comments, attendees voted for the project.

Five land tenants from which land the 16meter-wide powerline corridor was required, were consulted by M-KAT local representative since 2017, and an agreement for compensation was achieved.

A Stakeholder Engagement Plan (SEP) has been prepared. The SEP describes M-KAT Green LLP's approach to interacting with stakeholders, including the general public, and the disclosure of relevant information with respect to Company's current operations and the 100MWac Solar photovoltaic power plant M-KAT (SPP) construction plans (the Project). The SEP includes a strategy to provide timely, meaningful and appropriate information to stakeholders and ensure the opportunity for such stakeholders to express their views and comments. The SEP provides a mechanism for the consideration and response to comments and potential grievances raised by stakeholders. Engagement with stakeholders is an ongoing process, which applies to the entire period of the project implementation and operation.

To ensure continuous and systematic communication with stakeholders of the project, the Company will appoint a Community Liaison Officer (CLO).

The CLO will provide information, collect feedback, as well as provide answers to incoming communications (via email, telephone or in person). The CLO will regularly update this SEP, including Table 2 with particular attention to identification of vulnerable stakeholders. Company is required to use website which will act as the primary source of information for the public and NGOs at regional, national and international level, as well as a summary of all the efforts of engagement with stakeholders.

5.5 GRIEVANCE MANAGEMENT AND REDRESS

The Company has established a grievance mechanism as part of the Stakeholder Engagement Plan. Both the grievance redress mechanism and the Company Corporate Responsibility Program (CSR) will be publicly disseminated and will be placed on the information boards at the Alga central shop.

If someone has a complaint or grievance, this will be dealt through grievance and application register or a grievance mechanism that will be managed by the CLO. The objective is to resolve problems in a timely manner.

The stakeholders can submit their grievance in a box on the information boards, call or write a letter or an email to the CLO who will enter it in the grievance database. The database is for controlling the grievance handling process. This mechanism does not limit the public's rights to use the conventional routes

to place grievances and the available legal system. Depending on the grievance form, the CLO will reply accordingly, ensuring that the grieved party knows their rights, the date when the reply is due and that the grievance will not be closed until the party is satisfied with the answer or choose to follow further complaint procedures. All grievances will be logged and documented.

6 CORPORATE SOCIAL RESPONSIBILITY PROGRAM

A Corporate Responsibility Program (CSRP) is to be developed and agreed with the representatives of the local communities which are expected to directly benefit from the Program. It is suggested that the Company set a budget for the Program implementation during construction and an annual contribution during the operation. A long term sustainable improvements should be favoured over serving acute needs that may be provided by other financing sources.

The program will enable the communities to 'buy into the project' i.e. will ensure that they benefit from the project irrespective whether the project impacts on them or not. The Company shall discuss the CSRP and the needs with the Alga Rural Area Public Governance Council and provide them with information on the budget. The Company should use and disclose to the others involved the following criteria for a need qualifying for the CSRP funding: fit the allocated to the CSRP budget and accounts for other needs; not to overlap with the State programs, be sustainable; not to be biased to a particular group or person.

7 HUMAN RESOURCE POLICY AND LABOR OPPORTUNITIES

The Company's HR policy is regulated by the national Labor Code, which requires signing of individual contract with every employee, establishes minimum wages and benefits, as well as the right to participate in trade unions. No child labor, forced labor and discrimination prohibited by the legislation occur within the Company. The HR policy will take measures to comply with the ILO's core labor standards (CLS). The Company, including its contractor and subcontractors will comply with the national labor code and will also take measures to comply with the CLS.

The HR Policy is based on a three-level HR management system that systemizes and increases the transparency. The first executive level employees are hired through an open competition, but technical specialists might be employed differently to ensure uninterrupted technological process. At this level the individual plans are developed to identify the employee potential for further professional growth within the Company. The Company liaises with local higher education institutes in selection of bright graduates for potential employment. The second management level employees, which are responsible for planning and management of major operations, are hired from the promoted 1st level specialists and no open competition is conducted. The list of positions at the third governing level is approved by the internal documents of the Company.

Out of maximum 400 construction staff 350 panels assembling workers are expected to be employed from Shu and the near settlements. Under the supervision, they can perform the main volume of work of assembling of the panels and cables laying. Few others are expected to be hosted in various accommodation in Shu that will comply with the EBRD Minimum Accommodation Requirements. The workers will mainly be men, but their presence in an isolated site will have no community related impact. Use of Illegal, forced or child labour will be controlled by the local labor protection inspector and immigration police and thus the associated impact is unlikely. However, the Company shall emphasize this prohibition in the construction contract and include relevant checks in the internal audits. Considering that the Company will extend its existing practices over contractors control to this project, this form of impact is thought to be low.

During the operation employment is expected to be available for three local guards and three cleaners. Around 6 additional local unskilled workers for the solar panel cleaning will be required for the dry period of the year. Women applicants will be considered for positions during the operations phase.

In the long term the social benefits appear from two directions. More local jobs will be created because higher energy availability will allow further economic development in the region. Very minor long term benefit may be from encouragement of the school graduates to obtain appropriate education to qualify for an electrician position at the plant.

8 GENDER DIMENSIONS

The project will provide equal opportunities to women workers who may be interested to apply for a position during the construction and operations phase of the project. During the construction period about 200 to 400 workers are expected to be employed by a contractor, at least 5% of them would be women. During operations phase, about 16 staff will be engaged: four specialists will maintain the power plant, 3 will provide cleaning services, 3 will guard it in shifts, and 6 will clean solar panels. The company will exert its best effort to employ women during operations phase and of the total staff, at least 25% would be women. All job vacancies will be communicated to men and women through proper channels and aligned with the Stakeholder Engagement Plan. All women staff will also benefit from relevant trainings. A corporate social responsibility program will also be developed which will take into consideration projects that will benefit economically vulnerable groups and women.

Table 2 Gender equality improvements measures to which the Company has committed.

Measures	Completion Indicators	Timeline
Provide employment to women during construction period (total of about of 200 to 400 workers during construction)	At least 5% of total workers during construction (10-20 women)	by 2019
Provide employment to women during operations phase	At least 25%of total staff during operations are women	2019-2022
Facilitate participation of women in relevant staff trainings	100% women staff/workers are provided relevant staff trainings, including induction and safety trainings	2019-2022
HR policy to include provisions on nondiscrimination and prevention of sexual harassment	Provisions on nondiscrimination and sexual harassment to be reflected in the project company's HR policy	Before first disbursement
CSR Program to consider activities that benefit women and girls.	Design and implement at least 2 CSRP activities/community projects that benefit women, children and girls and/or reduce burden on women involving women beneficiaries.	2019-2025

Table 3 MKAT Solar Power Project and Land Requirements

Project Component	Area (hectares)	Location/ Village	Land type/use	Number of affected land owners /land users	Assets affected and area of remaining land	Compensation / Estimated Lease rate (to be confirmed by the Land Department)	Terms of land procurement /acquisition/ Lease	Status (indicate date of lease/ land certificate, if already acquired)
1.SPP Site	500	Shu District	State reserve land	Land under the Shu District Office- Not allocated to any entity	Remaining pasture lands available for use of villagers	Tax for agricultural losses KZT 29400000/Lease rate 3600000 KZT/year	Lease for 49 years; lease to be paid once a year	Resolution #111 from May 29 2017
2. Powerline	12km*16meters	Shu District	500	2.A Five land tenants (provide names/list of the private tenants)				
	18.492 ha Total area taken from the tenant's leased land including;	Shu District	Leased land used for 3 years			Total compensation 3 500 000 KZT determined by Land Committee based on future lost benefits/Lease rate for transmission line path 133146 KZT	One time compensation paid Agreement # 431 on release of land for the power line signed on December 4 th 2017;	Resolution # 202 from June 12 2018
	7.7 ha	Shu District	Leased land used for 3 years	NEXAGRO farm	Out of 424 ha	1 457 386.98 KZT	Agreement from May 12 2017	Acknowledgement of receipt from May 12 2017; <10% leased land affected (1.8%)
	0.16 ha	Shu District	Leased land used for 3 years	Zhunisbay farm	Out of 56.68ha	30 283.37 KZT	Agreement from April 27 2017	Acknowledgement of receipt from April 27 2017 <10% leased land affected (0.3%)
	3.98 ha	Shu District	Leased land used for 3 years	Adilet farm	Out of 163.34ha	753 298.72 KZT	Agreement from April 21 2017	Acknowledgement of receipt from April 21 2017 <10% leased land affected (2.4%)
	2.37 ha	Shu District	Leased land used for 3 years	Amina farm	Out of 330 ha	448 572.36 KZT	Agreement from June 5 2017	Acknowledgement of receipt from June 5 2017 <10% leased land affected (0.8%)
	1.28 ha	Shu District	Leased land used for 3 years	Halyk farm	Out of 110.5 ha	242 266.93 KZT	Agreement from April 27 2017	Acknowledgement of receipt from April 27 2017 <10% leased land affected (1.2%)
	Crosses Kuygen water channel	Shu District	Obtained permission to cross	1 2.B 1 Public entity affected Regional State Enterprise Kazvodhoz	NA	500000 KZT	No data	Approved on March 1 st 2017
3. Open Switch Unit	0,48	Shu District	State Reserve Land	None	None	None	Private property right	Resolution # 201 from June 12 2018

4. Access Road	5.5 ha	Shu District	State Reserve Land	Estimated Lease Rate 576600 KZT	Lease for 49 years	Decision # 237 from June 15 2018
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9 CORRECTIVE ACTION PLAN

No.	Action	Social Risks Liability/ Benefits	Legislative or Lenders requirement or best practice	Resources/ Responsibility	Target and Evaluation Criteria for Successful Completion	Time-frame
1. Land Acquisition and Involuntary Resettlement						
1.1	Monitor (and help facilitate) that the 5 tenants obtain their amended lease agreements and land deeds.	Complete procedure as per local regulations	ADB SPS	CLO	Monitor and report as part of the Annual E&S Report	December 2018
1.2	Fencing of 489 hectares out of the 500-hectare leased land to exclude the graveyard, the water channel and any village asset.	Avoid displacement and provide access to resources	ADB SPS	Management, design contractors, contractors	Monitor and report as part of the Annual E&S Report	During construction
2. Labour Conditions and Standards						
2.1	<p>Include Environmental mitigation measures and EHS principles in the Contractors' work in accordance with international standards and EBRD / ADB requirements.</p> <p>Emphasise prohibition of illegal, forced and child labour use by the contractor and subcontractors.</p> <p>Audit the contractor adherence to the EHS aspects of the contract, ensure timely correction of deviations.</p> <p>Company, contractors and subcontractors shall comply with the national labor regulations and take measures to comply with ILO's core labor standards.</p>	Ensure that contractors working on sub-project sites meet the requirements established in EBRDs Environmental and Social Policy (2014) and ADB's SPS and Social Protection Strategy, including specific requirements set out in the Environmental and Social Action Plan.	EBRD PR1, par.20 ISO 14001 OHSAS 18001, ADB SPS Prohibited Investment List, ADB SPS, ADB Social Protection Strategy	Design Consultant, External and internal resources, contractors.	<p>Proof provided of EPC Contractor capability.</p> <p>Audit reports to demonstrate compliance.</p> <p>Monitoring of compliance to be included in the Annual E&S Progress Report for lender</p>	Prior to and during construction
2.2	<p>Include EBRD EHS and social requirements into tender documentation and contracts.</p> <p>Select contractors that demonstrate adequate EHS and labour management capability.</p>	Work delays/ Good relations with authorities	Kazakh norms (SNiP, SanPiN, GOST), sectoral guidelines, EBRD policy	EHS plan to be developed at the contractor expense	Tender documents include ESAP requirements. Criteria for assessing contractors EHS and labour management capabilities established.	During tender packages preparation and construction

No.	Action	Social Risks Liability/ Benefits	Legislative or Lenders requirement or best practice	Resources/ Responsibility	Target and Evaluation Criteria for Successful Completion	Time-frame
	Ask contractors to obtain all required EHS permits and develop an EHS plan agreeable to the Company before starting any activities. Include in Contractor's contract a provision on compliance with national and local labor laws and measures to comply with the core labor standards.		ADB SPS Prohibited Investment List, ADB SPS, ADB Social Protection Strategy		Contractor EHS plan approved by the Company	
2.3	Ensure that contractor has a worker representative and a human resource policy which is disclosed to workers. Develop a grievance mechanism with ability to complain anonymously, records of satisfaction in the given answer and explanation to unsatisfied worker where to take their grievance further Produce annual report on implementation of grievance mechanism, types of grievances and resolutions	Better worker relations. Risks of work related conflicts are managed. Better communication between employer and employees and contractors	EBRD PR2, par.20 / Best practice	To be required to the contractor by the company EHS manager	Workers aware of this option. Anonymous complaints have been registered and answered. Annual report on grievance mechanism available	Prior to construction
3.Information Disclosure and Stakeholder Engagement						
3.1	Implement the Stakeholder Engagement Plan with the grievance mechanism and update it annually. Conduct information dissemination and meeting with surrounding stakeholders to increase awareness on the future construction in their area and potential impacts, and availability of grievance procedure if they have any issues/concerns.	Community and other stakeholders' issues identified and expectations managed	PR 10.– meaningful consultation, ADB SR 1-3	Top management / CLO	SEP is up to date and implemented in full Grievance records properly maintained.	Before and during construction and operation.
3.2	Provide general public access to information on the E&S performance of the Project and the Company	Large discrepancy between actual and perceived impact / Good company image	ADB SR1 sec.3, SR2 sec.5 , Best practice	CLO	Information disclosed according to SEP	During construction and operation.
3.3	Report annually on project E&S issues and benefits and implementation of action plans to Lenders and other stakeholders	Ensure transparency on E&S issues	PR 10 – Information	CLO	Reports provided in time and fully completed	Annually throughout Project

No.	Action	Social Risks Liability/ Benefits	Legislative or Lenders re- quirement or best practice	Resources/ Responsibil- ity	Target and Evalua- tion Criteria for Suc- cessful Completion	Time- frame
			disclosure, ADB SPS		Monitoring reports dis- closed on ADB web- site	implemen- tation
4.	Gender Dimensions					
	<p>Implement the following gender actions:</p> <ul style="list-style-type: none"> • Provide employment to women during construction period (total of about of 200 to 400 workers during construction) —At least 5% of total workers during construction (10-20 women) • Company to exert best effort to provide employment to women during operations phase —At least 25%of total staff during operations are women • Facilitate participation of women in relevant staff trainings—100% women staff are provided relevant staff trainings, including induction and safety trainings • HR policy to include provisions on non-discrimination and prevention of sexual harassment—Provisions on non-discrimination and prevention of sexual harassment to be reflected in the project company’s HR policy (to be submitted to ADB before first disbursement) • CSR Program to consider activities that benefit women and girls. —Design and implement CSR activities/community projects that benefit women, children and girls and/or reduce burden on women involving women beneficiaries. 	Making the project design more gender inclusive benefitting women and girls	ADB Policy on Gender and Development	Management and CLO	Reports provided in time and fully completed Monitoring reports disclosed on ADB website	Annually throughout Project implementation

APPENDIX 1 DETAILS OF PERSONS CONSULTED

The following stakeholders were interviewed:

- | | |
|--|--|
| • Alga rural area council specialists | Kayrat and Zulfiya |
| • Public Governance Council Chairman | Amankan |
| • Director Sauytbek school | Klara Baubekova |
| • Director of Alga school | Dana Tileuzhanova |
| • Alga day clinic chief doctor | Zhanar Bayzakova |
| • Farmers of Alga and Sauytbek | Sabit, Zhankhyrbek, Alik, Maksut |
| • Herders of Alga and Sauytbek herds | Nurkhanat, Maksut, Alik, Zhankyn-
bek |
| • Head of Shu branch of Tarazvodkhoz (irrigation channels) | Adel Kapanov |
| • M-Kat land acquisition specialist | Zair Orudzhov |
| • Land department chief specialist | Aidos Smagulov |
| • Architecture department specialist | Zeinola Samashev |
| • Veterinary department chief vet | Abdumarat Daurenbekov |

Local residents from Alga and Sauytbek villages were asked individually and in the focus groups although ability to form gender segregated focus groups was limited. The individuals natives included women, unemployed and retired.

The questioned were asked whether they knew of the project and if so, what did they know. What ongoing problems they had; what impact and benefits for themselves did they see from the project? The stakeholder engagement and grievance handling mechanisms expected to be established on the project was explained and opinions where asked on its effectiveness. The most appropriate places for the project information disclosure were identified.

The following questions were asked during the interviews:

- What ongoing problems do you have apart from the project?
- Are there any interruptions to electricity?
- Name any improvement/deterioration that happened in the past 5 years in the village.
- How long have you been living here? Where do the new settlers come from?
- What is the main source of income? Do you have problems with unemployment in the village?
- What do you think are the impacts and benefits from the project?
- Do you think the stakeholder engagement mechanism will be able to take your opinion into account? What is the most appropriate place to post information about the project?
- How do you feel about the project? Do you approve of it in general?

APPENDIX 2 REVIEWED DOCUMENTS

- a. Local EIA (OVOS) and preEIA for M-KAT Solar Power Plant construction and Natural Resource Management Office ecological expertise positive conclusions on them;
- b. State Technical Review of the feasibility study;
- c. State land rental deeds for SPP;
- d. Technical conditions for connection
- e. Alga rural area passport and general plan for development
- f. Veterinary data
- g. Shu district and Shu town cadastral maps
- h. Lists of vulnerable families from the rural area council and the schools
- i. List of Alga rural area enterprises
- j. SPP preliminary layout from 02.03.2018
- k. Powerline plan approved by 5 crossed land plots tenants and authorities
- l. Substation plan
- m. Archaeological Survey
- n. Topographical survey
- o. Geological survey

APPENDIX 3 LAND ALLOCATION DOCUMENTS

Provided as separate pdf files