

Stakeholder Engagement Plan

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August 2018

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

Prepared by EcoSocio Analysts LLC.

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M-KAT GREEN SOLAR POWER PLANT

STAKEHOLDER ENGAGEMENT PLAN



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ABBREVIATIONS

CLO	Community Liaison Officer
CSR	Corporate Social Responsibility Program
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
LLP	Limited Liability Partnership
LRP	Livelihood Restoration Plan
NGO	Non-Governmental Organization
OVOS	Environmental Impact Assessment based on Russian standards
PR	Performance Requirement of the EBRD Environmental and Social Policy 2008
SEP	Stakeholder Engagement Plan
SPP	Solar Power Plant

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) describes M-KAT Green LLP ŝ (the Company) approach to interacting with stakeholders, including the general public, and the disclosure of relevant information with respect to Companyŝ 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.

The Project aims to provide sustainable and environmental and socially friendly source of renewable electrical energy for the region to reduce energy deficit and allow further economic development 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. Indirect benefits are expected to be minimal or none.

2 LEGAL FRAMEWORK

The activities specified in this plan conform to Kazakhstan legislation including ratified by Kazakhstan international conventions, the EBRD Performance Requirement 10 for information disclosure and stakeholder engagement and ADBŝ Safeguard Policy Statemen (2009) and Public Communications Policy (2011).The project will be designed to meet best international practice. Table 1 summarizes the Kazakhstan and EBRD requirements.

Table 1 Stakeholder consultation requirements summary

EBRD PR10 requirements/ADB SPS (2009)	Kazakhstan Requirements
Identify people or communities that are or could be affected by the project, as well as other interested parties.	Stakeholder identification is not required. Relevant regulatory bodies to be identified
Ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation.	Public notice to be published in two local newspapers in Kazakh and Russian languages 20 days before the meeting that ends the consultation. Local council shall be consulted on the time and place of a public meeting and invited to it.
Maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during project implementation.	
Begin consultations early in the environmental and social appraisal process.	
Throughout the life of the project provide ongoing information to identified stakeholders, commensurate to the nature of the project and its associated environmental and social impacts, and the level of public interest.	
Stakeholder engagement will be free of manipulation, interference, coercion, and intimidation, and conducted on the basis of understandable and accessible information, in a culturally appropriate format;	
If required by the EBRD, Stakeholders should be able to provide comments and recommendations on the draft Stakeholder Engagement Plan;	Stakeholders shall be engaged and project information disclosed 20 days before the EIA is submitted to the State Environmental Expertise for approval.
Disclose a non-technical summary in the Kazakh and Russian languages and in accessible and culturally appropriate manner,	
Tailor stakeholder engagement to the needs of any disadvantaged or vulnerable groups;	
Publish regular reports to external stakeholders on the Company environmental and social performance and publicly disclose monitoring reports on ADB website;	Grievance mechanism shall comply with the Law on Grievances Handling procedures (†) 221-III 12.01.2007
Establish a grievance mechanism, inform the affected communities and ensure that the mechanism addresses concerns promptly and transparently, in a culturally appropriate manner, and is readily accessible to all stakeholders.	

3 SUMMARY OF THE PROJECT STAKEHOLDERS ENGAGEMENT AND INFORMATION DISCLOSURE TO DATE

The consultation with stakeholders is in full compliance with the RoK requirements and for the public meetings went beyond them as no public meeting is required for the project. A public note was sighted in the local newspaper Shu Dolina two weeks before the first meeting in Shu Cinema Park Entertainment Center on March 9 2016. The meeting attended 13 people. The town council representative, the designer, EIA developer and the Company representative conducted the meeting. It was stated that the feasibility study was to be available for examination by the public. After two hours, the open vote of the attendees was unilaterally for the project.

The second meeting was conducted on 28.04.2017 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 Company representative. Without much discussion, attendees voted for the project.

The shown in Section 4.7 relevant NGOs have not been identified and individually invited to the meetings. Neither them nor other public groups attended the meetings or expressed interest in the project in any other way.

Five land tenants from which land the 16m wide powerline corridor was extracted, were consulted by the Company local representative, and an agreement for compensation was achieved to release a portion of their leased land from the Government.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS¹

4.1 Stakeholders and Information Needs

Table 2 identifies the stakeholders currently known and indicates how information will be transmitted to them during the preparation and implementation of the Project in Russian and Kazakh languages as is judged to be most appropriate for a specific stakeholder. Information for international NGOs will be disclosed in English.

To ensure continuous and systematic communication with stakeholders of the project, the Company has appointed a Community Liaison Officer (CLO) Mrs. Yuliya Allakhverdiyeva

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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.

The Company has placed the information on the project website which acts as the primary source, as well as a summary of all the efforts of engagement with stakeholders.

4.2 Local Authorities and Regulators

The CLO has established communication with the rural area council. With the rural area Public Governance Council (5 representatives of 5 villages of the area), the rural area councilor is expected to play

¹ The project stakeholders are the individuals or groups who are directly and/or indirectly affected (positively or negatively) by the project and generated by its activities or have interests in the project or the developer or have the potential to influence project outcomes or the developer operations or contribute to the work due to their expert knowledge of and/or experience in the region.

key role in identifying local needs and project related problems and apprehensions. They shall receive the project related information in paper copy or over email, as appropriate. The CLO will maintain regular telephone contact with the councilor and during construction period conduct several meetings in relation to the development and implementation of the Corporate Social Responsibility Program (CSR). The councilor is expected to be a driving force in organizing the local community if this is required to implement the CSR. The rural area council will be informed about the results of the CSR discussion and employment plans.

Communication with the regulators will be formal and within the required by the legislation framework. No additional information will be addressed to them directly.

4.3 The Project Workers

The project workers and the contractors will be informed on the employment conditions, on changes to the work requirements and likely duration of their involvement. The grievance handling mechanism will also be explained.

4.4 Suppliers of Goods and Services

The Company will ensure fair selection and allow potential suppliers to have sufficient time for building qualitative and quantitative capacity for the required services. The Company management will conduct meetings with managers of the businesses that may benefit from the project or be negatively affected by them and ensure that the businesses are aware of the services (character and volume) that are planned to be procured locally and the contractor selection process.

The Company will be responsible for establishing communication with suppliers and will ensure that health, safety, environmental and social requirements are incorporated in the contracts. The suppliers will be informed in advance that their EHS and social performance, work sites and documentation will be monitored via regular audits. The Company will provide early information on changes in demand to enable timely adjustment without jeopardising the contractor business and personnel security. The supplier personnel involved in the project will be included in the information disclosure process and grievance mechanism.

4.5 Local Population

The local population is represented by the rural area Public Governance Council and organised by the rural area councillor. The Alga and Sauytbe residents are expected to be interested in the project related jobs and qualification improvement opportunities in the nearest future and in a longer perspective. The CLO will disclose the list of professions that will be required by the project at each phase, regular information on the work progress and the grievance mechanism.

The project information location will be disclosed through the local mass media. The media will also be fed with the project updates regularly and will be expected to disclose it. A local shop at the central crossing of Alga village was suggested to be the most appropriate place for sighting the project information.

4.6 Local Media

The CLO will identify a point of contact in the popular regional newspaper Shu Dolina and provide him with initial project information, impacts, benefits and opportunities, explain grievance mechanism and give detailed project information on request. The paper is expected to disclose the project information to a wider audience in an accessible and culturally acceptable form.

4.7 Non-Governmental Organizations

The CLO will establish email contact with representatives of the regional environmental and social NGOs Zhan Daa, Minbulak, Zhualy Zhastary, Innovatsyonnye Proekty to provide them with initial information on the project. The missed NGOs are expected to apply to the CLO through the grievance mechanism.

International NGOs with an interest in the project may obtain information in English at the EBRD's website (www.EBRD.com).

Table 2 Project stakeholders and information disclosure methods

Stakeholder	What to disclose	How and Where	When
Alga rural area council	NTS, SEP, bulletins employment plans, CSRP discussion results, project updates and schedule	Telephone, email, formal letters hand delivery if required and meetings at the council office	As soon as possible
District and regional regulatory bodies	EIA, vacancies, formal reports	Formal submissions through Shu Public Servicing Center, Job Center and Social Protection Office	As required by legislation
Project workers	Employment conditions and labour rights, grievance mechanism with changes	Information board at SPP onsite office	Before construction starts then continuously
Suppliers of goods and services	Early warning on required services and significant changes in demand. EHS project requirements	Project related website and email after subscribing on the website	As soon as possible
Job seekers	Vacancies and list of professions that would be required at the plant during operation	Project information board at Alga shop,, notes to local newspapers, points of contact, formal reports to Shu job center and Social Protection Office, website	
Alga and Sauytbe residents	NTS, SEP, bulletins, vacancies, Corporate Social Resp. Program	Project information board at Alga shop, whatsapp group on request	Before construction starts bulletins once a week
Vulnerable groups	NTS, SEP, bulletins Specific impact and work schedule, LRP if developed	Visits, telephone, email bulletins, text messaging of any changes	
South Alga herders	Plans for fence erection	Phone calls	Before fence is erected
Local media	1.NTS, SEP, 2. detailed project information on request	1. Website, 2. emails to points of contact, press-releases	At start of construction and on commissioning
Local and international NGOs	NTS, SEP, project schedule, extracts from annual report	Website notes and mailing if registered	As per EBRD disclosure requirements

5 VULNERABLE GROUPS ²

The impact assessment concluded that implementation of the project will result in reduction of near village pasture used in spring and early summer. For the rest of the year the Alga south herd livestock daily travel distance increase will not be significant and is unlikely to result in notable reduction of milk or meat yield or rise in the herder services cost. This situation may however change with time and thus

² Vulnerable groups includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by the project than others and who may be limited in their ability to claim or take advantage of related to development benefits. Vulnerable groups in the context of actual or economic displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities or communities dependent on the natural resource used by the project.

will be monitored by the CLO. He will be communicating with the herder to check whether the number of the cattle in the herd fell or whether the cost of herding became higher than for the west herd. If so, The CLO will find the reasons for these changes and with the help of the herder and rural councilor identify the group that could have been impacted by the changes in the pasture availability. Then CLO will identify the number of the group livestock, losses related to the livestock reduction, sources of income and proportion of this income paid for herding. If CLO identifies that the deterioration of livelihood of some households from the group relates to appearance of the SPP fence, he will develop and implement a livelihood restoration plan.

Four enterprises that use the SPP access road are thought to be vulnerable to any blockages during the road or the bridge over the Levoberezhnyy Canal construction. The CLO will visit the access road users before the work on the road starts, explain the measures that will be taken to retain the road accessibility during its upgrade and obtain their opinion on the planned position of the off ramps to their premises from the road. He will call them monthly to check whether they have experienced any problems with the road use.

The Amina farm owner is vulnerable to possible damage of this winter fodder crops as a result of installation of two powerline poles. The farm owner will be asked about his plans for using the arable plot, informed about the expected impact on the soil from the pole installation and the expected installation schedule. The CLO then will work with the owner on the means to minimize the impact on crop.

If impacts on the identified vulnerable groups could not be avoided, a Livelihood Restoration Plan (LRP) will be prepared to minimise the associated impacts or compensate for them. During each decision making process, the CLO will ensure that these vulnerable groups are considered first. The CLO will also monitor changes in the Saulytbe and Alga community for vulnerability aspects and appearance of other groups. If another vulnerable group is identified, it will also be evaluated and monitored and the most appropriate ways of engaging it in the decision making process will be developed.

6 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE MECHANISM

The mechanism below is a project specific addition to the general public communication practices the Company is obliged to follow under the legislative requirements (Table 1) or conducts on its own accord. The mechanism is designed on the basis of available information. This mechanism may need to be changed as a result of consultation with the aforementioned stakeholders.

Because common languages for all identified stakeholders are Russian and Kazakh, information will be displayed in both languages. International stakeholders will find the Non-Technical Summary and the Stakeholders Engagement Plan in English.

The following information will be disclosed on the Company's website, which is to be developed and launched before the SPP comes to operation:

1. Project non-technical summary with the schedule;
2. This SEP with the grievance mechanism;
3. Vacancies and employment procedures;
4. Answers to frequently asked questions;
5. Annual report to EBRD and ADB on ESAP implementation.

The following information will be disclosed on the information board:

1. Project non-technical summary with the schedule
2. Grievance mechanism
3. Vacancies and employment procedures;
4. Community Liaison Officer contacts;
5. Project bulletins (A5 size) describing completed and planned tasks identified impacts, impact mitigation measures, answers to stakeholders comments and corrective actions taken.

During the SPP operation annual reports on environmental and social performance and summary of grievance handling will be given to the rural area council to disclose and on the project related website.

Most grievances and suggestions are expected to be received through mailboxes located in the rural area council, on the web site and via e-mail.

7 RESOURCES AND RESPONSIBILITIES

The Community Liaison Officer (CLO) reports directly to the Company director. He will perform the following functions:

- ¿ Maintain the disclosed project information up to date through preparation of bulletins;
- ¿ Process grievances (receipt/collection, registration in the database, response deadlines watching, sending mail responses and posting information on information board)
- ¿ Control implementation of remedial actions;
- ¿ Participate in disputes resolution;
- ¿ Regular reassess the project impact on vulnerable groups
- ¿ Assess the effectiveness of the mechanism of interaction with stakeholders every year and rework this plan accordingly;
- ¿ Document all meetings and consultations conducted and file systematically.

8 MONITORING AND REPORTING

The CLO will analyse received grievances and given answers at the end of each month. He will monitor the CSR implementation by the rural area council. The CLO will report annually on the environmental and social action plan and CSRP implementation, the project environmental and social performance and the grievance mechanism effectiveness. The report will be posted on the project related website and in the locations stated in Table 2. Key information on environmental and social performance of the project and on CSRP and livelihood assistance program implementation will be disclosed to the local community in a form and language they can understand. The monitoring reports (in English) will be disclosed on ADB website in accordance with the ADB Public Communications Policy.

9 GRIEVANCE REDRESS MECHANISM

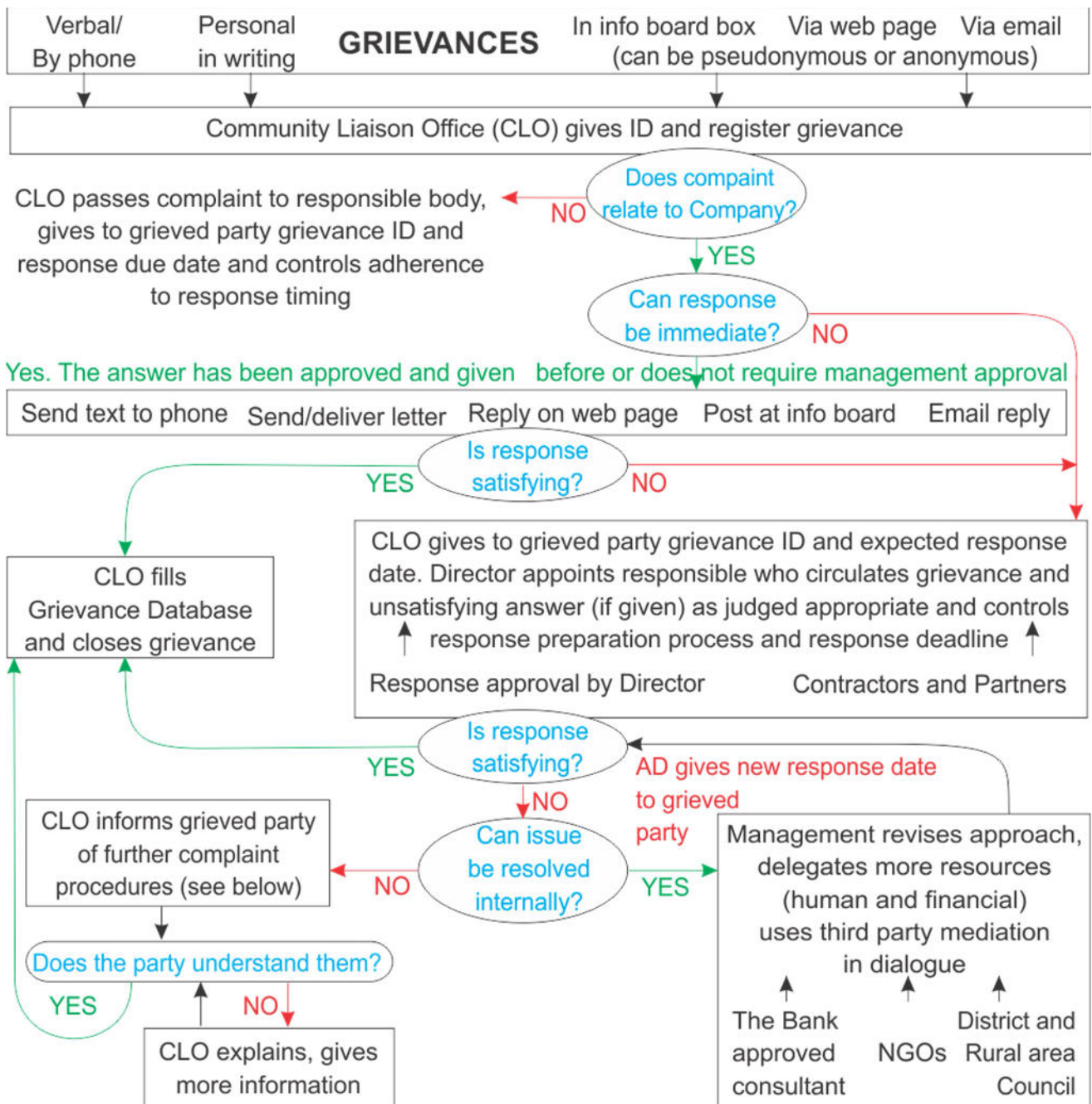
If someone has a complaint or grievance, this will be dealt through grievance and application register or a grievance mechanism that will be managed by the CLO. The objective is to resolve problems in a timely manner. The mechanism will be displayed at the locations shown in Table 2.

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 (Table 3). 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, as shown in the flowchart below, 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 given below.

Table 3 Grievance database fields. ID example stands for the first questions on September 29th.

Grievance ID	Name / address	Question /Grievance	Answer method	Reply Due Date	Status	Given answer	Is response satisfying
2018.09.29.01			Text to mobile		given to..., closed etc.		yes, no



Further complaint procedures:

1. Write a formal complaint to the Alga rural area council, request the reply date;
2. Write a formal complaint to the Shu town Prosecution Office;
3. Appeal to the Aarhus Convention Implementation Committee by calling to 8 (7172) 799 644 or sending an email to aarhus@inbox.ru

GRIEVANCE FORM	
Reference No:	
Full Name Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> <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"/> Russian <input type="checkbox"/> Kazakh
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 Community Liaison Officer (CLO) Mrs. Yuliya Allakhverdiyeva

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