

BAIKONUR JSC/AKIMAT/KYZYLORDA TAZALYGY

Kyzylorda Waste Management Project

Stakeholder Engagement Plan

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1 Introduction

Solid Waste Management presents a significant challenge to Kazakhstan. The country has been reported to have accumulated 23 billion tons of wastes and continues to produce up to 700 million tons annually. Out of this amount as much as 97 % are being landfilled, whereas only 3 % is being recycled. The majority of the landfills do not meet basic sanitary and environment protection regulations.

While the Government of Kazakhstan has approached the problem in its Programme for modernisation of solid waste management for 2014-2050, the authorities of Kyzylorda Region (Oblast) seek to establish a modern integrated waste management facility including a separation MBT facility, CHP functioning on a biogas and a new landfill complying with the EU sanitary and environment safety requirements. Also, it will include an equipment of the city with separated waste collection systems, including new containers separately for biowaste and other types of waste as well as new collection vehicles providing for improvement of environmental conditions.

Moreover, implementation of the project will require a closure of an existing landfill in an appropriate manner and in compliance with good international practice and a launch of an appropriate public awareness campaign informing the citizens about the benefits of the waste separation and ways it is accomplished. However, the closure of the existing landfill is not a part of the EBRD financed project and will be financed by Akimats (local municipalities)/GoK.

TOO Kyzylorda Tazalygy (further, the Company) will be the operator of the new MBT plant and a landfill. The Company is municipally owned.

This Stakeholder Engagement Plan (SEP) is aimed at avoiding and minimising the social risks associated with the implementation of the project and achieving a long term social license to operate. The Stakeholder Engagement Plan outlines the planned stakeholder engagement activities including consultations and involvement process. It is based upon a systematic approach helping to maintain constructive relationships with the stakeholders during the implementation of the project.

The SEP has been developed in accordance with the international standards required by the European Bank for Reconstruction and Development and in compliance with the principles of IFC Performance Standards on Environmental and Social Sustainability, January, 1, 2012, Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, Aarhus, Denmark, June, 25, 1998 and Directive 97/11/EC, on the Assessment of the Effects of Certain Public and Private Projects on the Environment.

1.1 Project scope

At the start it is important to define the scope of the Project, the project area and its impact area. The Project comprises of several components targeted at enhancement of the environmental sustainability of the city through

- 1) the equipment of the city with new containers for separate collection of biowaste and residual waste, and with separate vehicles for transportation of the waste types;
- 2) launching a public awareness campaign informing on the benefits of separated collection and the rules to separate;
- 3) construction of a new landfill in line with all relevant international and EU norms and regulations and related infrastructure;
- 4) construction of the MT and BT plant for waste separation and biowaste processing;

¹ Andrew P. Beklemishev, Kazakhstan Country Report, Global Information Society Watch, 2010:

http://www.giswatch.org/sites/default/files/gisw2010countrykazakhstan_en.pdf

- 5) construction of the CHP plant for generation of "green energy" from the biowaste produced;
- 6) closure of the existing landfill in an appropriate manner.

1.2 Project area

The City of Kyzylorda is located in the Southern Part of Kazakhstan on the northern bank of Syrdarya river, as seen in Exhibit 1.

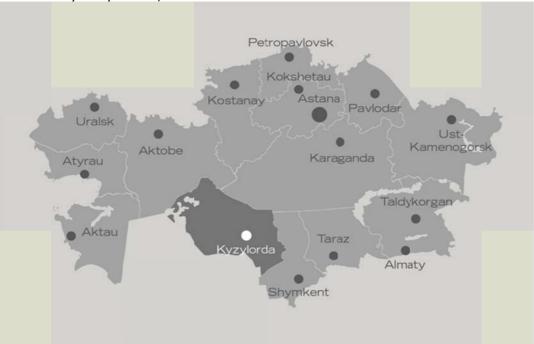


Exhibit 1 Location of the Kyzylorda City

The Project Area is defined as follows:

- the new landfill and MT and BT plant site, including the road areas in its vicinity
- the existing landfill, including the road areas in its vicinity (Exhibit 2Exhibit 2)
- the whole city waste collection and transportation

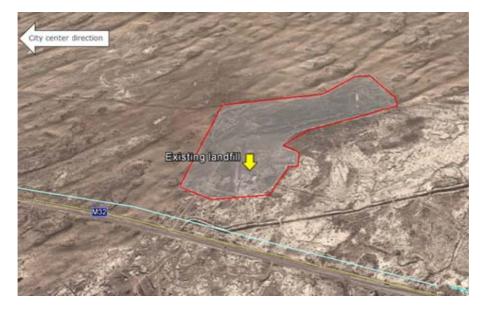


Exhibit 2 Municipal solid waste landfill

The operating official landfill is located within the city boundaries². The closest settlement, Belkol village, is situated 3 km to the east. "Samara-Shimkent" motor road is located ca 1,2 km to the north-east. The total area of the landfill is ca 40 ha.

1.3 Project location

In accordance with the requirements of the Aarhus Convention, several alternative locations have been evaluated.

The locations are presented in Error! Reference source not found...

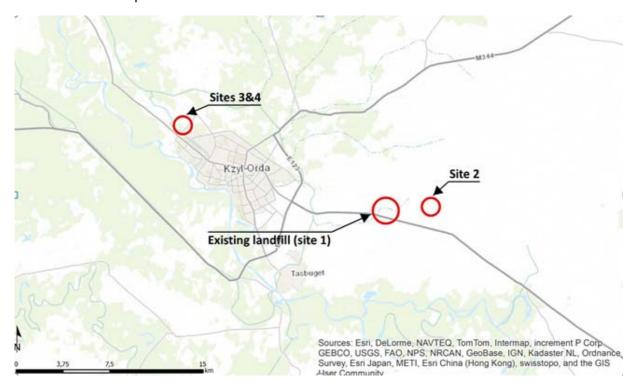


Exhibit 3 Sites identified in cooperation with Akimat of the City of Kyzylorda and the Land Institute

1.3.1 Description of the sites

Site 1 is the existing landfill area that was suggested to be modernized and possibly expanded. Another sub-alternative was to construct a new landfill next to the landfill. Several activities were identified in close vicinity of Site 1, which were not compatible with further use as landfill. Site 1 did not thus comply with Sanitary Epidemiological requirements and will not be further investigated.

Site 2 is located at a distance of 3,7 km east from the existing landfill. No restraining factors such as resettlement needs, open water sources, industrial or other activities were identified within the 1 000 m sanitary zone. Based on GIS mapping, no sanitary buffer zone risks were identified. The on-site investigation results are presented in picture below. Site 2 was selected for further planning and design of the facilities, being the most feasible site and the one that best complies with the relevant requirements.

y stroy i osnovyi gosudarstvennogo upravleniya/id-V15L0004952/>.

² The city's borders have been expanded and now it spreads over a vast territory, much of which is scarcely or not developed, as of Decree of Kyzylorda Oblast Akimat, March, 18th 2015: http://tengrinews.kz/zakon/gosudarstvennyie organyi kyizyilordinskoy oblasti/konstitutsionnyi

Site 3 is located an industrial area, located about 15 km North-West from the Kyzylorda city center. Several sanitary buffer zone risks were identified. There were lots of open water bodies and a number of human activities, including an agricultural farm. The site did not comply with Sanitary Epidemiological requirements. *Site 3 did not comply with Sanitary Epidemiological requirements and will not be further investigated.*

Site 4 is also located an industrial area and is neighbor area to site 3, located about 15 km North-West from the Kyzylorda city center. In this area, a number of sanitary buffer zone risks were identified as well. There were lots of open water bodies and number of human activities. *The site did not comply with the Sanitary Epidemiological requirements and will not be further investigated.*

Conclusion: Site 2 was selected as the location for the facilities.

1.4 Project characteristics

The project includes establishing a modern integrated waste management facility in Kyzylorda with a modern mechanical and biological solid waste treatment plant (the "MBT") combining

- waste separation
- recycling
- generation of "green" energy via the process of anaerobic digestion
- a new sanitary landfill for the remaining waste.

The project also entails the closure of the existing landfill in accordance with the international environmental and sanitary standards realized by the local government. With the closure, the land will be sealed with a layer of soil, marked with No entry signs and closed for entrance from outsiders.

MBT is a generic term for an integration of several mechanical processes commonly used in other waste management facilities such as Materials Recovery Facilities (MRFs), composting or Anaerobic Digestion plant. MBT plant can incorporate a number of different processes in a variety of combinations. Additionally, MBT plant can be built for a range of purposes.

The MBT plant is designed to include a diversion of non-biodegradable and biodegradable Municipal Solid Waste (MSW) going to landfill through the mechanical sorting of MSW into materials for recycling and conversion biodegradable fraction into biogas for energy recovery.

The feasibility related investigations will last until March. The project implementation schedule will be decided upon at a later stage and along with the work commencement date will be a subject to a further public notice.

Projected operational lifetime for the mobile and stationery machinery of the MBT is estimated at 15 years. The projected operational lifetime of the landfill is estimated at 25 years.

1.5 Summary of possible impacts

As the Project concerns the entire waste management system of the City of Kyzylorda, there will also be more impacts to nearly all residents. Unlike their current practice, they will be required to act according to the new waste management scheme, ie. have their wastes transported to the new waste treatment plant. Transportation and proper treatment of the waste means a service that the

users need to pay for. Public acceptance of the changes, and the required cultural and behavioral change, can only succeed with the help of a well-designed public education and communication campaign.

An Environmental and Social Analysis will be disclosed at a later stage in accordance with the project schedule in a course of the projected Environmental and Social Due Diligence. In addition to the aforementioned social and socio-economic impacts (including waste tariffs), health safety and public nuisance impacts, there will be ecology and nature conservation, landscape and visual impacts, traffic and transport impacts, and impacts to noise levels, emissions to ground and water, air emissions, archeology and cultural heritage.

The impacts that are most relevant in the Stakeholder Engagement context are the social and health impacts; respectively those of the existing landfill and of the new facility/system. The people that are most affected by the current poor waste management are the waste-pickers, eg. persons collecting materials such as metals from the landfill and selling them to scrap stores in the village or the city. The impacts to these people immediately connected to the waste management are primary social/socioeconomic impacts of the Project. They will lose their current income. It should, however, be possible to employ many of them in the new waste management center. This will be elaborated in the Livelihood Restoration Plan. In addition, they will not be subject to the health risks and hazards caused by current waste picking practices, which include making fires at the landfill to separate metals from other materials. Another important social impact of the Project will be the level of waste tariff for population. The tariff issue has been carefully elaborated in the E&S Analysis report through the affordability analysis and will be addressed and open for discussion at the 2nd Public Hearings. Kyzylorda City Administration will continue informing public on the tariff determination process in a timely manner involving local media and provide an opportunity for participation in a discussion on tariffs.

It is estimated that projected impacts can be managed and mitigated in accordance with the best practice. The measures that will be adopted include informing the local population in a timely manner about upcoming activities and repairing any damages incurred.

1.6 Legal requirements for disclosure and consultation

1.6.1 National legal requirements

Environmental Code of the Republic of Kazakhstan as of January 9, 2007, N212 regulates the requirements for public hearings. Public hearing proceedings are described in the regulation "On Amendments to the Order of the Minister of Environmental Protection of Kazakhstan Republic dated May 7, 2007 Nº 135-P "On Approval of the Rules of public hearings" (registered Nº 8427, 10.04.2013).

In accordance with the established legal practices, the owner of the project shall agree beforehand with local executive authorities, in whose territory the work planned to be carried out, time and place of the public hearing and publish an announcement in the media presenting the time and place of the meeting. The Announcement has to be published in the Kazakh and Russian languages not later than 20 calendar days before the hearing.

The Announcement will be also presented on the Internet websites of the local executive authorities. It is envisaged to use additional ways to inform the public (local media).

1.6.2 EBRD requirements

All Projects funded by the EBRD are required to meet good international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy of 2008.

These requirements are described in detail in Policy Requirement (PR) 10 of the Policy "Information Disclosure and Stakeholder Engagement". In summary, the EBRD considers stakeholder engagement an ongoing process which involves:

- the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders
- meaningful consultation with potentially affected parties, and
- a procedure or policy by which people can make comments or complaints.

1.6.3 Good international practices

A Stakeholder Engagement Plan shall comply with the basic international principles defined in the IFC Performance Standards on Environmental and Social Sustainability of January 1, 2012 and Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, done at Aarhus, Denmark, on 25 June 1998 as well as with the EU Directive 85/337/EEC, amended by the Directive 97/11/EC, on the Assessment of the Effects of Certain Public and Private Projects on the Environment.

These practices require, eg., ensuring universal public access to the environmental information and the studied alternatives, so as to allow the public to make an informed decision.

2 Summary of Previous Stakeholder Engagement Activities

The previous stakeholder activities have included the media coverage to raise awareness amongst the population regarding current environmental concerns and planned project and the cooperation and meaningful discussion between the Company and the local administration.

2.1 Regional administration

The Regional administration (Akimat) and City administration (Akimat) provide an active support to the project. Kyzylorda Regional administration, the City of Kyzylorda administration and EBRD signed an agreement on joint implementation of the project "Disposal of solid waste in the city of Kyzylorda" already in November 2014. The event has been covered by the local media, including "Kyzylorda News" underlining the environmental benefits of the project and the increase in employment opportunities therein.

The company "Kyzylorda Tazalygy" is owned by Kyzylorda City Akimat and, therefore, it has been working in a close cooperation with the local administration right from the start of the project. Kyzylorda City Akimat will take on the responsibility for arrangement and implementing the Public awareness programme and will run a public grievance mechanism of the Project. It will provide an appropriate response to the public grievances and feedback.

The kickoff meeting between the company, consultants and the local administration has been held on the 16th of June with the participation of the Deputy Akim of Kyzylorda, Head of the City Department of Housing and Communal Services and Housing Inspection, Head of the Implementation of activities for Natural Resources and Environmental Control. The meeting has also been covered by the local media also disclosing the key information, main objectives and targets of the projects.

Furthermore, a series of meetings were held with the participation of the following authorities in June-August 2015:

- City department of housing and communal services and prevention of accidents;
- Deputy Akim
- Head of the Department of Natural Resources and Environmental Control;
- Deputy Head of the Energy and Housing and Communal Services (HSC);
 and several other affected or interested stakeholders.

The local administration has a direct hotline for the citizens of the region, where they can address their requests:

Kyzylorda region administration:

Contact number +7 (724)2 262144

Kyzylorda city administration:

Contact number +7 (724)2 605511

2.2 Contacts and activities with the media

LLO "Kyzylorda Tazalygy" has established a relationship with local media representatives in order to inform the public on the rules and practices of waste

recycling and changes, if there are such, in tariffs for waste collecting services. To be more precise, it has reached an agreement with local newspapers "Syr boyi" and "Akmeshit aptaligi" to publish articles related to events the company holds. Moreover, the company, in cooperation with local TV channel "Kogam TV", carries out raids in the city twice a week in order to correct violations of the waste disposal rules.

Thus, local media is actively involved in the public awareness activities bringing attention to the environmental pollution and sustainable waste management, by providing news coverage and support.

Hereunder are listed the internet, newspaper and TV articles related to the project and solid waste management:

"Kyzylorda Oblast landfills do not meet the standards"/"Қызылорда облысындағы қоқыс полигондары талапқа сай емес", bnews.kz» news web-site, July 4, 2014: http://bnews.kz/kk/news/post/215340/>

"Regional center is getting surrounded by garbage"/"Аудан орталығының айналасын қоқыс басты", «Habar» TV company, August 19, 2014: https://www.youtube.com/watch?v=2i85w3b1ZHc

"Municipal waste recycling factory will open in Kyzylorda Oblast"/ "Қызылорда облысында тұрмыстық қалдықтарды өңдейтін зауыт ашылады", «Kazakhstan» National TV company, November 10, 2014: http://kivvi.kz/watch/v7cep1m2au9j/

"EBRD will investigate the project of municipal waste project in Kyzylorda Oblast"/ "Қызылорда қаласында тұрмыстық қатты қалдықтар жобасын ЕҚДБ қаржыландырады", «strategy2050.kz» governmental web-site, November 11, 2014: http://strategy2050.kz/news/14983/>

"Medical waste landfill was found"/ "Медициналық қалдықтардың қоқыс алаңы табылды", «31» Commercial TV company, February 23, 2015: http://www.31.kz/video/show/id/6418/show/ib

"Cleanliness guarantees wealth and blessing"/ "Тазалықпен бірге ырыс, береке келеді", «Halyk» National newspaper, November 20, 2015: http://www.halyk-gazeti.kz/index.php?option=com_content&view=article&id=3381:2014-11-20-04-22-43&catid=5:2011-11-18-09-02-24&Itemid=5>

"Nationwide voluntary works on city cleaning start on March 15" / "Қызылордада 15 наурыздан жалпыхалықтық сенбілік басталады", «Syr boyi» Kyzylorda regional newspaper, March 12, 2015: http://www.syrboyi.kz/zedelnews/1887-yzylordada-15-nauryzdan-zhalpyhalyty-senblk-bastalady.html

"142 localities of Kyzylorda Oblast lack landfills"/ "Қызылорда облысының 142 елді мекенінде қоқыс төгетін арнайы полигондар жоқ", «Astana TV» TV company, June 7, 2015: https://www.youtube.com/watch?t=47&v=z2yTNIF3gWM

Local media will be utilized in order to disseminate the information on the project's proceedings.

Hereunder is a list of the most important local and regional media:

Local newspapers:

«Akmeshit akshamy», Email:a akshamy@mail.ru

«Akmeshit aptaligi», Email:akmeshit-aptaligi@mail.ru

«Akhparat kz», Email: akparat-kz@mail.ru

«Alash zholy», Email: alash zholy@mail.ru

- «Alem. Ekologiya zhane tanimdik biznes», Email: anuarova70@mail.ru
- «El tilegi», Email:eltilegi_gazeta@mail.ru
- «Kyzylorda news», Email:<u>kyzylorda-news.kz@mail.ru</u> Website: <u>www.kyzylorda-news.kz</u>
- «Kyzylordinskie vesti», Email: kizvesti@mail.ru Phone no.: +7 7242 70 00 56 Website: www.kzvesti.kz
- «Syr ainasy», Email: samruk87@rambler.ru
- «Komu? Chto?», Email: komu chto@bk.ru Phone no.: +7 (7242) 276464 Web-site: www.gazeta-komu-chto.satu.kz
- «Syr boyi», web-site: http://syrboyi.kz/

Television:

- «Kogam TV», Phone: +7 7242 27 69 50
- «Kazakhstan-Kyzylorda», Phone: +7 7242 26 15 15
- «7 Arna», Phone: +7 7172 90 17 17
- «Astana TV», Phone: +7 7172 39 37 58

2.3 Customers

The service providing company LLP "Kyzylorda tazalygy" does not have a hot line for the customers to report the claims at the moment. However, customers may contact the company via email: korkeytu kz@mail.ru.

The Company has no formal grievance mechanism for receiving and responding to community concerns and grievances. Therefore a grievance mechanism, as required by the IFIs, has been established and presented as part of this SEP (see 6 Public Grievance Mechanism).

At the moment, a system of monitoring the customers' satisfaction level as well as a project website are needed. The Company is recommended to consider developing and publishing the website first. Next, a customer satisfaction system should be established. Such a system would collect feedback by questionnaires that can be delivered to the users on waste management bills and online.

3 Identification of Stakeholders and Communication

Herewith are identified the stakeholders that are or might be affected by or interested in the implementation of the Project.

Stakeholders	Populatio	Type of	Timing	Notes/Comments
	n	Communication and Proposed Method		
		Wethod		
Internal Stakeho	olaers 			
Employees of LLP "Kyzylorda Tazalygy"	employees	Internal newsletter, bulletin board, grievance procedure. Trainings, information on the work issues, employees' rights and responsibilities.	Starting the official Announcement and throughout the disclosure period, project duration	
Sub- contractors	318 employees	Information meetings, grievance procedure. Trainings, information on the work issues, employees' rights and responsibilities.	Starting the official Announcement and throughout the disclosure period, project duration	
Employees of LLP "Ibrayhan I K-LTD" working at landfill operation	20 employees	Internal newsletter, bulletin board, grievance procedure. Trainings, information on the work issues, employees' rights and responsibilities.	Starting the official Announcement and throughout the disclosure period, project duration	
Waste pickers at the operating landfill	ca 10-20 persons	Interviews on-site in the existing landfill. Meetings involving local authorities and representatives of the community Conducting and follow-up of the	Several of the waste pickers have been interviewed on-site (Nov 19 th 2015). First meetings are designed to be held prior to the construction phase in the course of implementation of	In contrast to the existing landfill, the new landfill area will be closed from outsiders, which effectively ends the current informal waste-picking. The separated materials will be recycled in a systematic material

		Livelihood Restoration Plan	the Livelihood Restoration Plan	at the facility, and this necessitates workforce, thus, providing possibilities to the waste-pickers to be formally employed, as presented in the Livelihood Restoration Plan. It is necessary to work closely with the local authorities in order to ensure identification of the stakeholders, their proper informing on the project and its impacts, disclosure of the Livelihood Restoration Plan and eligibility for possible compensations or other mitigation measures.
External Stakeho	olders			
Kyzylorda City Administration (Akimat)	n/a	Official correspondence Meetings	Starting the launch of the Project and throughout its lifetime	
Kyzylorda Regional Administration (Akimat)	n/a	Official correspondence Meetings	Starting the launch of the Project and throughout its lifetime	
Kyzylorda Regional State Department of ecology of Environmental Regulation and Supervision Committee of the Ministry of the Environment and Water Resources of the Republic of Kazakhstan	n/a	Official correspondence Meetings	Starting the launch of the Project and throughout its lifetime	
Common public (Customers)	approx. 157,400 inhabitants	Information on the Project will be published on the Kyzylorda City	Starting the official Announcement and throughout the	

		Akimat's website	project life	
		Akimat's website Announcement on the Public Consultations will be made through local media and will be published on Kyzylorda City Akimat's website Disclosure Package will be presented during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat. Information on the project proceedings will be available at the designated website Grievance Mechanism will be established to address all complaints and concerns that might arise	project life	
Media	n/a	Interviews, press conferences, information request Information on the Project will be published on the Kyzylorda City Akimat's website Announcement on the Public Consultations will be published on the Administration's website, and will be delivered through local and regional media Disclosure Package	lifetime oe	

will be presented during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat Information on the project proceedings will be available at the designated website Information on the Project will be published on the Kyzylorda City Akimat's website Announcement on the Public Consultations will be made through local media and will be published on Administration's website Disclosure Package will be presented during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat Information on the Infor	,_,		Toject Stakenolder		
NGOs and other organizations ³ Project will be published on the Kyzylorda City Akimat's website Announcement on the Public Consultations will be made through local media and will be published on Administration's website Disclosure Package will be presented during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat Announcement and throughout the project life Announcement and throughout the project life			during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat Information on the project proceedings will be available at the designated		
project proceedings will be available at the designated website Official correspondence	NGOs and other	n/a	Project will be published on the Kyzylorda City Akimat's website Announcement on the Public Consultations will be made through local media and will be published on Administration's website Disclosure Package will be presented during the Public Consultations and available for download at the designated website as well as available for pickup at Kyzylorda City Akimat Information on the project proceedings will be available at the designated website Official	Announcement and throughout the	

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³ Interested NGOs and other organizations were not identified at this stage

4 Disclosure of Information

Official Announcement of the First Public Hearings has been made on November 26th 2015. Public hearings are scheduled for the week 51, thus complying with the requirement of minimum 20 calendar days' period between the official announcement and the public hearings.

The Disclosure package will include the following Project documents in Kazakh, Russian and English languages:

- Stakeholder Engagement Plan
- Overall presentation of the Project(Powerpoint)

Hard copies of these documents will be available at the following locations:

Kyzylorda City Akimat, Receiving office, Kyzylorda, Y. Zhakaeva str. 16, room 117

Office hours: daily from 9:00 till 18:00

Contact numbers: +7 7242 40 09 51, 27 00 81, 26 20 85

Announcements include the venue, date and time of the first public hearing:

Date and time: 15.12.2015, 10:00

Venue: Community Center named after Askar Tokmaganbetov

Announcements will be repeated starting November, 26th up to December, 15th:

- On the local TV, KogamTV, three times a day in Kazakh and Russian;
- In the local newspaper, Akmeshit Aptalygy, staring November, 28th up to December, 15th two times a week in Kazakh and Russian languages.

Official Announcement of the Second Public Hearings has been made on May 6th 2016. Public hearings are scheduled for the week 21, thus complying with the requirement of minimum 20 calendar days' period between the official announcement and the public hearings.

The Disclosure package will include the following Project documents in Kazakh, Russian and English languages:

- Non-Technical Summary of the Project
- Livelihood Restoration Plan
- Overall presentation of the Project(Powerpoint)

Hard copies of these documents will be available at the following locations:

Kyzylorda City Akimat, Receiving office, Kyzylorda, Y. Zhakaeva str. 16, room 117

Office hours: daily from 9:00 till 18:00

Contact numbers: +7 7242 40 09 51, 27 00 81, 26 20 85

Livelihood Restoration Plan will also be distributed between waste pickers at the operating landfill during week 20 and will be available for pickup at the local scrap yard.

Announcements include the venue, date and time of the second public hearing:

Announcements will be repeated starting May, 6th up to May, 26th:

- On the local TV, KogamTV, three times a day in Kazakh and Russian;
- In the local newspaper, Akmeshit Aptalygy, May, 6th up to May, 26th two times a week in Kazakh and Russian languages.

Date and time: 26.05.2016, 10:00

Venue: Sabira Maykanova culture center

The purpose of the meeting will be to present the documents contained in the disclosure package and collect comments. Relevant officials are invited to attend through direct invitation. Local representatives of the donor are also invited to all public consultations or other public events.

Public announcements on the availability of the disclosure package for review and comments will be made in the local media, including the "Kogan TV", and the local newspaper "Akmeshit Aptalygy", at the start of the disclosure period.

During operation, the Company and the Project team will continue to disclose information to the local communities and the general public on the Project's environmental and social performance, including any scheduled meetings or other activities with stakeholders, through the established project section of the Kyzylorda City Akimat's website, and via the media channels described above. As stated above, for the new waste management system to function, a complete cultural change is necessary and this requires a thorough process of public education and communication. It is recommended to advance this process through 1) a campaign, effectively comprising of frequent local meetings in the housing areas, and 2) a follow-up of the waste management situation in housing areas and at the waste management centre, 3) establishing a training programme for economically displaced people as well as 4) monitoring programms to follow up on the information campaign and a training programme. The Grievance Procedure described in Section 6 will also remain in place throughout the Project's lifespan.

5 Stakeholder engagement activities

n/n	Activity	Date/Comments	Place	Notification	Language
A1	Consultation/Intervie w with waste pickers	November 19 th , 2015	Operating landfill, scrap yard	in cooperation with LLP "Ibrayhan I K- LTD	Kazakh, Russian
A2	Announcement of the First Public consultation	November 26 th 2015	local media, namely, "Kogan TV", local newspaper "Akmeshit Aptalygy"	local media	Kazakh, Russian
А3	First Public Consultation	December 15 th , 2015	Community Center named after Askar Tokmaganbeto v	Announcemen t	Russian, English
A4	Introductory Disclosure Package (SEP, Presentation)	presented at the First Public Consultation distributed at the Public Consultation available at the reception of Akimat of Kyzylorda City right after Public Consultation	presented at the First Public Consultation distributed at the Public Consultation available at the reception of Akimat of Kyzylorda City right after Public Consultation	Announcemen	Kazakh, Russian, English
A5	Announcement of the Second Public consultation	May 6 th , 2016	local media, namely, "Kogan TV", local newspaper "Akmeshit Aptalygy"	local media	Kazakh, Russian
A6	Consultation with waste pickers, disclosure and distribution of the LRP	During week 20	Operating landfill, scrap yard	in cooperation with LLP "Ibrayhan I K- LTD	Kazakh, Russian
A7	Second Public Consultation (LRP, Tariffs, Project Implementation Plan, Investment and Financing Plans)	May 26 th , 2016	Sabira Maykanova culture center	Announcemen t	Russian, English
A8	A fit-for-purpose Disclosure Package (NTS, Livelihood	presented at the Second Public	to be announced	Kyzylorda City Administration 's (Akimat)	Kazakh, Russian,

	Restoration Plan)	Consultation		website,	English
		available at the web-site right after the Public Consultation			
B1	Development of the public education and communication campaign on the new waste system of Kyzylorda – campaign for cultural and behavioral change.	Campaign shall be developed by the relevant departments of the City administration, preferably, with an involvement of the qualified Consultant in the II-III quarters of 2016. Information on the development of the campaign shall be available and the public participation in the discussion must be assured.	Kyzylorda City Administration	Kyzylorda City Administration 's (Akimat) website, local media	Kazakh, Russian
B2	Public education and communication campaign on the new waste system of Kyzylorda – campaign for cultural and behavioral change. Information on the planned waste management system, of the impacts and opportunities.	Starting IV quarter of 2016. Local information meetings and discussion meetings must be held twice a year informing the public regarding the up-to-date status of the project and giving a possibility for an open discussion. Preferably, local meetings in different districts of the city so that they are accessible to all.	to be announced	Kyzylorda City Administration 's (Akimat) website, local and regional media, Flyers (information leaflets)	Kazakh, Russian
В3	Establishment of a Monitoring Programme on the Information Campaign	Kyzylorda City Administration shall establish a monitoring mechanism and a responsible Monitoring Committee for a working group developing a campaign. Working group must consist both of City officials and representatives of Kyzylorda Tazalygy. During the development	Kyzylorda City Administration , Kyzylorda Tazalygy	Kyzylorda City's website, local media	Kazakh, Russian

	stage monthly reports shall be delivered to the assigned Monitoring Committee on the progress of the Campaign Development and since the launch of the campaign the reports on the activities shall be delivered on the quarterly basis. The Milestones must be made public, for example, via newsletter or notifications on the website.			
Development of the training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for employment in the waste management facility	Training or vocational education programme shall be developed by and in cooperation between the City's Committee on Labour, Social Protection and Migration of Kyzylorda Region and relevant city authorities. It is advisable to investigate a possibility of launching a programme under the umbrella of the existing regional development programs (for example, Regional Development - 2020, Employment - 2020)	Kyzylorda City Administration , Kyzylorda Regional Administration (Committee on Labour, Social Protection and Migration of Kyzylorda Region)	Kyzylorda City Administration 's (Akimat) website, local media	Kazakh, Russian
Training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for employment in the waste management facility	During 2016-18 while completing the works for new facility	to be announced	local media; Kyzylorda City Administration 's (Akimat) website Flyers (information leaflets)	Kazakh, Russian
	training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for employment in the waste management facility Training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for employment in the waste management	reports shall be delivered to the assigned Monitoring Committee on the progress of the Campaign Development and since the launch of the campaign the reports on the activities shall be delivered on the quarterly basis. The Milestones must be made public, for example, via newsletter or notifications on the website. Development of the training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for employment in the waste management facility Training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for example, Regional development programs (for example, Regional development - 2020, Employment	reports shall be delivered to the assigned Monitoring Committee on the progress of the Campaign Development and since the launch of the campaign the reports on the activities shall be delivered on the quarterly basis. The Milestones must be made public, for example, via newsletter or notifications on the website. Development of the training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for example, Regional Administration (Committee on Labour, Social Protection and Migration of Kyzylorda Region and relevant city authorities. It is advisable to investigate a possibility of launching a programme under the umbrella of the existing regional development programs (for example, Regional Development 2020, Employment 2020, Employme	reports shall be delivered to the assigned Monitoring Committee on the progress of the Campaign Development and since the launch of the campaign the reports on the activities shall be delivered on the quarterly basis. The Milestones must be made public, for example, via newsletter or notifications on the website. Development of the training programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for example, Regional Development programme under the umbrella of the existing regional development programme under the umbrella of the existing regional development programme for the affected people (people who have lost their job at the landfill and waste pickers): skills required for example, Regional Development - 2020, Employment - 2020, Employment - 2020, Employment the works for new facility the works for new facility the works for new facility website Filyers (information leaflets)

F /		14 1 1 6"	17	17 1	1711
B6	Establishment of a Monitoring Programme on the Livelihood Restoration Plan	Kyzylorda City Administration shall establish a monitoring mechanism and a responsible Monitoring Committee for a working group developing and implementing a training programme. Working group must consist both of City officials, representatives of Kyzylorda Tazalygy and an independent consultant. During the development stage monthly reports shall be delivered to the assigned Monitoring Committee on the progress of the Training Programme and since the launch of the programme the reports on the activities shall be delivered on the quarterly basis. The Milestones must be made public, for example, via newsletter or notifications on the website. The Success indicators for the training programme may include: decrease of the unemployment rate amongst the target	Kyzylorda City Administration , Kyzylorda Tazalygy	Kyzylorda City's website, local media	Kazakh, Russian
		the target group			

6 Public Grievance Mechanism

6.1 Grievance by general public

Kyzylorda City Akimat as an owner of TOO Kyzylorda Tazalygy accepts all comments and complaints associated with the Project and its operations. An example of the Grievance Form is provided in Annex 1 of this document.

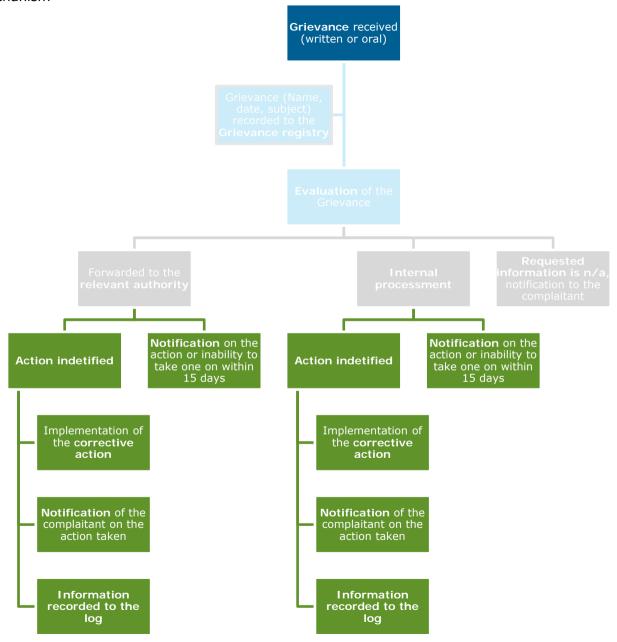
Any person or organization may send comments and/or complaints by phone or via post or email using the contact information provided in Section 8. All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.

All grievances will be registered and acknowledged within 10 working days and responded to within 30 working days. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

Akimat will keep a grievance log of all grievances, including those received and addressed by contractors, based on which grievance management reports will be produced and included in the annual environment, health and safety and social reports submitted to the EBRD.

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Kazakhstan.

Exhibit 4: Public Grievance Mechanism



7 Monitoring and reporting activities for the stakeholder engagement processes

The Company together with Akimat will assume the full responsibility for the due implementation of the Stakeholder Engagement Plan and ensure that all necessary activities are conducted in due time and in accordance with the IFI's standard.

Kyzylorda City Akimat will assume the responsibility for the implementation of the Grievance Mechanism.

All complaints will be monthly revised by the assigned Grievance Manager:

Mr. Rysbek Abzal Rysbekuly, email: abzal 0404@mail.ru, phone: 8 777 457 66 96.

Kyzylorda City Akimat will commit to answering the complaints in a timely and effective manner. The Stakeholder Engagement Plan will be constantly revised in the course of the project.

8 Responsibilities for delivering the stakeholder engagement process

Kyzylorda City Akimat assumes full responsibility for undertaking the supervision of the stakeholders to the Project and supervising engagement with all stakeholders and will provide for a complete and concise transmission of the information in accordance with the relevant international standards and practices. The implementation of the grievance procedure falls under the responsibility of Kyzylorda City Akimat.

The Stakeholder Engagement Plan is a living document and will be regularly revised and updated upon the implementation of the Project.



Annex 1

Public Grievance Form

Public 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	First Name: Last Name: I wish to raise my grievance anonymously I request not to disclose my identity without my consent			
Contact information	By post Please, write the address: By phone Please, indicate your phone number: By email Please, indicate your email address:			
Preferred language of communication	Russian Kazakh			
Description of incident or grievance What happened? Where did it happen? Who did it happen to? What is the result of the problem? Source and duration of the problem?				
What would you like to see happen to resolve the problem?				

	dd/mm/yyyy
Date of incident/grievance	One time incident/grievance
	Happened more than once (how many times?)I
	On-going (currently experiencing problem)

Signature: ______
Date: _____

Please return this form to: Kyzylorda City Akimat

Contact person: Mr. Rysbek Abzal Rysbekuly, email: abzal 0404@mail.ru, phone: 8 777 457 66 96.