



Stakeholder Engagement Plan

Almaty International Airport, Kazakhstan – New International Terminal

August 2021

ALA Almaty
International
Airport

TAV
Airports



a member of
Groupe ADP



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List of Acronyms

ALA	Almaty International Airport
ATM	Air traffic movements
CCTV	Close Circuit TV
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ERM	Environmental Resources Management
ESAP	Environmental and Social Action Plan
ESDD	Environmental and Social Due Diligence Assessment
ESIA	Environmental and Social Impact Assessment
GoK	Government of Kazakhstan
GRC	Grievance Review Committee
HVAC	Heating, ventilation and air conditioning
IFC	International Finance Corporation
LARF	Land Acquisition and Resettlement Framework
NTS	Non-Technical Summary
PR	Performance Requirement
PS	Performance Standards
SEP	Stakeholder Engagement Plan
SPZ	Sanitary Protection Zone
TAV	TAV Airport Holdings

1. Introduction

1.1. Requirements for and Purpose of the Stakeholder Engagement Plan

This document is the Stakeholder Engagement Plan (SEP) prepared at the outset of the project to construct a new international terminal at the Almaty International Airport (ALA) (the Project) and updated during the Environmental and Social Impact Assessment (ESIA) process in relation to the proposed construction and operation of a new international terminal building..

In accordance with EBRD's Performance Requirement 10, this SEP outlines how communication with identified stakeholders will be handled throughout project preparation and implementation, including the grievance procedures envisaged. This SEP documents how consultation will be carried out with different groups in the community, identifying what measures will be implemented to remove barriers from participation.

IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Market¹ states that "a good SEP should:

- Describe regulatory, lender, company and / or other requirements for consultation and disclosure;
- Identify and prioritise key stakeholder groups;
- Provide a strategy and timetable for sharing information and consulting with each of these groups;
- Describe resources and responsibilities for implementation stakeholder engagement activities; and
- Describe how stakeholder engagement activities will be incorporated into a company's management system."

This SEP has therefore been prepared to fulfil the above requirements.

Both EBRD and IFC have produced guidance documents in relation to stakeholder engagement during the Covid-19 pandemic, further details are provided in Appendix A and considerations have been made throughout the SEP.

The SEP should be considered a live document and will be regularly reviewed and further updated as required to reflect the Project's needs for further engagement with stakeholders during the Project lifecycle, including prior to the Project major phases, any new or changed operations, modifications in the Project design or if new stakeholders are identified.

¹ Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Market, 2017

2. Project Background and Description

2.1. Almaty International Airport

ALA is the largest international airport in Kazakhstan and is situated 12 km northeast of central Almaty. It is bordered by a mix of open land and residential settlements. The airport is located north of the settlement of Guldala, and north-east of other city districts, including Tbilisskaya and Kolhozshy, all of which lie within the wider region of Almaty.

The airport has been operational since 1947 at which time it was in civil/military use. The airport currently consists of two parallel runways, apron areas (comprising taxiways and aircraft parking stands), helipads, and associated facilities and infrastructure. These include car parks, a wastewater treatment facility, further buildings (such as for storage, mechanical engineering, air traffic control, hangars, fire station and offices), and storage areas. The airport fuel depot, with associated rail sidings and above-ground pipework, is located within the northern area of the airport. The current terminal building was constructed in 2004 after a fire destroyed the previous terminal building during the late 1990s.

Figure 1: Layout of Almaty International Airport



Source Land Acquisition and Resettlement Framework Kazakhstan: Almaty International Airport Project

The project is for the development of a new international terminal building and refurbishment of the existing terminal for domestic use in support of increased air traffic. The current terminal capacity is limiting potential growth at ALA and traffic forecasted is assumed to reach its capacity of at least 10 million passengers, annually. Accordingly, the correlated peak hour international traffic is forecast at 1,600 air traffic movements (“ATMs”) and 1,200 ATMs for domestic and these have been used to determine the terminal size requirements. It is indicated that the area required for the international terminal is 53,800 m² and approximately 30,000m² for the domestic terminal. The current domestic area is 30,370m², therefore remodelling of this available space is possible.

A number of development options were considered including the terminal remaining in its current form. The preferred option was deemed to be extending the existing terminal to the north over the footprint of the current VIP terminal building, with the creation of a viaduct to provide road access to the new building (see Figures 2 and 3 below). This option utilised land within the current airport boundary, however, it is understood the VIP building is designated by the Kazakh Government as having local heritage value. Therefore, under the Historic-Cultural Heritage Use and Protection Ordinance of Republic of Kazakhstan

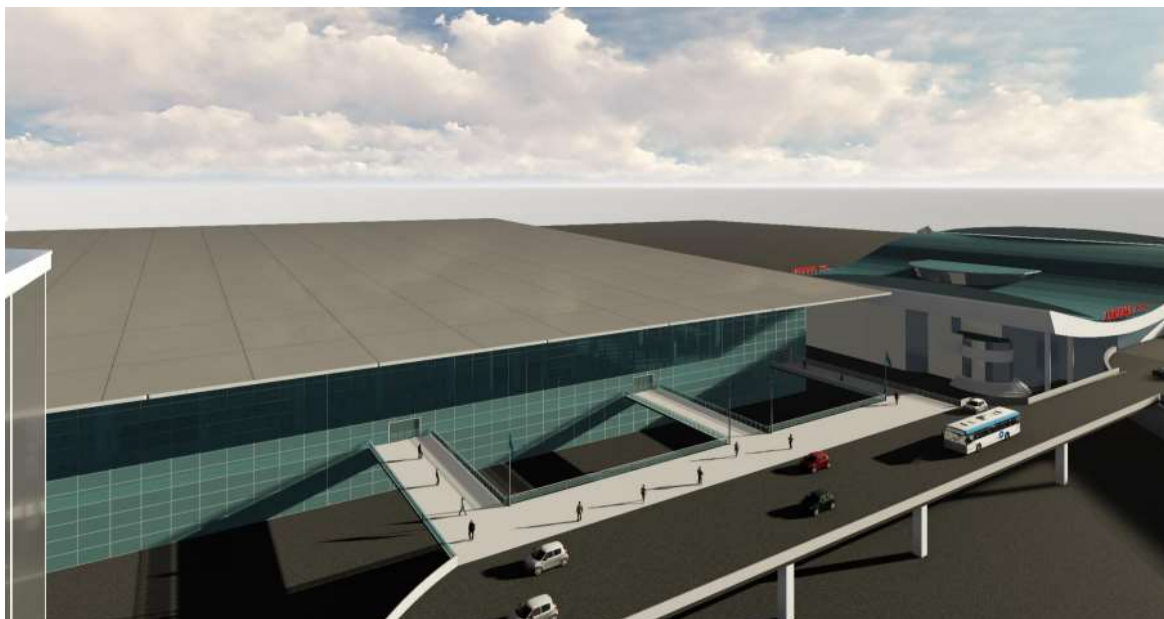
Laws and Regulations 1992 it cannot be moved, changed or demolished (depending on structural condition) without approval of local permitting and national cultural heritage regulators.

Figure 2: Option 1 Master Plan



Source: TAV construction

Figure 3: Option 1 Perspective Image



Source: TAV construction

The main parties involved in the Project are listed below.

Table 1: Main Parties Involved in the Project

Position	Organisation
Project Sponsor	TAV Airports Holding
Design / Engineering Team	ADP Ingenierie https://www.adp-i.com/en Astana Engineering Project
EPC Contractor	TAV Construction
Regulators	Almaty City Akimat and respective departments RK Ministry of Culture and Sport https://www.gov.kz/memleket/entities/mks Airport Commission
International Lenders	EBRD https://www.ebrd.com IFC https://www.ifc.org EADB https://eabr.org/en/ DEG https://www.deginvest.de/
Consultants	Lenders Independent Advisor within the Working Group Environmental Resources Management (ERM Ltd.) heritage advisors (other advisors may also be appointed) Mott MacDonald Limited (Environmental and Social Impact Assessment (ESIA) Consultant) Waterman Infrastructure & Environment Limited (Environnemental and Social Due Diligence (ESDD) Consultant)

2.2. Project Timeline

The stakeholder engagement process will continue through all project implementation stages including:

- Preparation / design phase: 2020-2021 setting of funding conditions, planning / development applications and development of design documentation, including national Environmental Impact Assessment (EIA) and international ESIA process.
- Construction phase: dates currently unconfirmed however, the construction period is likely to be 24 months and include demolition works, earthworks, construction of new terminal building including installation of utilities, reconfiguration of existing terminal building.
- Operational phase: commissioning of the international and domestic terminal building is expected on completion of construction with dates to be confirmed.
- Decommissioning phase: there is no decommissioning date planned at the time of writing, the terminal has been designed to accommodate future growth at ALA.

Specific measures will be implemented at every stage of the Project aimed at providing continuous information to stakeholders and obtaining feedback from them.

The airport take-over process has been completed on 29.04.2021. The Airport Extension Project is currently in the Preparation and Design phase.

3. Stakeholder Identification and Analysis

2.3. Identification of Stakeholders

In accordance with the EBRD and IFC requirements regarding stakeholder engagement, the Project has identified and documented various individuals and groups who are affected or likely to be affected (directly or indirectly) by the Project (affected parties) or may have an interest in the Project (other interested parties).

This will provide an indication of those who have an interest in and / or are concerned about the Project and, consequently, should be included in the engagement process.

Identified stakeholder groups are presented in Table 2. This stakeholder list will be verified and may be changed at each stage of the Project implementation.

Table 2: Stakeholder Identification

Stakeholder Group	Stakeholders	Notes and Contacts
Key Stakeholders		
Local communities subject to noise impacts	Properties within the SPZ and / or noise insulation scheme boundary.	Nur-Shashkan (Almaty micro-district) Guldala
Local communities within the safety zones/areas	Properties within the PSZs / PSAs.	Local businesses (industrial, commercial and agricultural) as well as residential properties.
NGOs with cultural heritage interests	Local residents and cultural heritage activists.	ICOMOS Kazakhstan (Monuments Preservation Association) www.icomos.org Initiative groups "Archcode Almaty" www.archcode.kz Let's Protect Almaty https://www.facebook.com/groups/101045316913046/ Protect Kok-Zhailau ALMATY is a beloved city Alma-Ata is my home The duty officer in the city of Almaty
Local communities within areas subject to LARF	Guldala residents, Talgar District farmers whose crops attract birds, houses within regulated SPZ, land users within PSAs/PSZs, properties at risk within the ASZ	To be identified in the monitoring process
Vulnerable community groups	Elderly people, large families, single-parent families, people with disabilities, families who lost their main income provider and other low-income groups, unskilled workers, women and female-headed households, young adults, children aged 15 and younger, Oralmans and Uigurs.	Public Association "Voluntary Society of Disabled People of Turksib District" (+7 (727) 236-76-00, +7 (727) 235-34-18)

Stakeholder Group	Stakeholders	Notes and Contacts
Employees of ALA	Employees and their representatives, trade unions and airport emergency services.	Airport offices, trade union office and welfare facilities
Temporary construction workers	TAV Construction workers and workers of sub-contractors selected during the tender process.	TAV construction offices and site office (during the construction phase)
Project consultants and advisors	ADP Ingenierie Astana Engineering Project (design team). ERM Cultural Heritage Advisor Mott MacDonald Limited AstanaIngProekt, LLC Lenders Independent Advisor within the Working Group Other consultants	ADP Ingenierie https://www.adp-i.com/en Astana Engineering Project Environmental Resources Management (ERM) heritage advisors
Suppliers, contractors and private businesses	Any contractors / suppliers selected during the tender process.	
Commercial operators within ALA	Airport operators, taxi drivers, commercial tenants.	Airport commercial department

Stakeholder Group	Stakeholders	Notes and Contacts
National, regional and local governments, authorities and regulators	Public authorities and regulators	<p>Government of the Republic of Kazakhstan RK Ministry of Industry and Infrastructure Development http://www.miid.gov.kz/en</p> <p>RK Ministry of Culture and Sport https://www.gov.kz/memleket/entities/mks</p> <p>RK Ministry of Defence https://www.gov.kz/memleket/entities/mo/?lang=ru</p> <p>RK Ministry of Employment and Labour https://www.gov.kz/memleket/entities/enbek/?lang=ru</p> <p>RK Ministry of Health https://www.gov.kz/memleket/entities/dsm/?lang=ru</p> <p>Committee of Civil Aviation subordinate to the RK Ministry of Industry and Infrastructure Development https://www.gov.kz/memleket/entities/aviation/?lang=ru</p> <p>JSC "Aviation Administration of Kazakhstan" Airport Commission http://www.caakz.com/ru/</p> <p>Almaty Region Akimat http://zhetyysu.gov.kz/</p> <p>Almaty City Akimat https://www.gov.kz/memleket/entities/almaty/?lang=ru</p> <p>Talgar District Akimat https://www.gov.kz/memleket/entities/zhetyysu-talgar/?lang=ru</p> <p>Iliy District Akimat https://www.gov.kz/memleket/entities/zhetyysu-iley/?lang=ru</p> <p>Green Economy Authority of Almaty https://www.gov.kz/memleket/entities/almaty-eco/?lang=ru</p> <p>Akimat of Almaty District Sanitary Epidemiological Service https://www.gov.kz/memleket/entities/departament-kkbtu-almaty/?lang=ru</p> <p>Department of Architecture and Urban Development of Almaty Region https://www.gov.kz/memleket/entities/almaty-ugask/?lang=ru http://saulet.zhetisu.gov.kz/</p> <p>Tourism and Foreign Affairs Department of Almaty City https://www.gov.kz/memleket/entities/almaty-tourism/?lang=ru</p> <p>Police Department of Almaty Region http://mvd.gov.kz/portal/page/portal/almo/MAIN</p> <p>Turksib district akimat of Almaty https://www.gov.kz/memleket/entities/almaty-turksib/?lang=kk</p> <p>Guldala Rural District Akimat https://www.gov.kz/memleket/entities/zhetyysu-talgar/?lang=ru</p> <p>AlmatyGenPlan https://almatygenplan.kz</p> <p>Almaty Development Centre https://almatydc.kz</p> <p>Republican State Enterprise "Kazrestavratsia" under the Ministry of Culture and Sport</p>

Stakeholder Group	Stakeholders	Notes and Contacts
International lenders	IFC and EBRD	IFC www.ifc.org EBRD www.ebrd.com
Other Stakeholders		
Land Users (other)	Customers and visitors.	Airport website and notice boards www.alaport.com
Non-governmental Organisations (NGOs)	A number of NGOs may be interested in discussing the environmental aspects of the Project including but not limited to the Regional Centre of Ecology and Health Protection, Green Salvation, Ecological Fund of Kazakhstan and WWF Kazakhstan.	Posadiderevo.kz http://posadiderevo.kz AirVision.kz https://airvision.kz Association of Environmental organisations of Kazakhstan https://aeok.kz Clean Air Almaty https://airkaz.org/almaty.php EcoUnion Tabigat https://ecounion.kz/?page_id=3278 Protect Kok-Zhailau Green Salvation http://esgrs.org
Mass media outlets	Regional and local media.	KazTAG https://kaztag.kz/ru/ Zakon.kz https://www.zakon.kz Kazinform, http://kazinform.kz Nur.kz http://nur.kz Delovoy Kazhakstan https://dknews.kz Vremya www.time.kz
Local institutions	Local hospitals, local schools and universities.	Voyennyi Klinicheskiy Gospital' Mo RK Poliklinika No.28 City Clinical Hospital Schools No.44 and 32 Civil Aviation Academy

If you are a stakeholder who has not been identified in the table above and would like to be kept informed about the Project, please contact the Project at the address provided in Chapter 6.

4. Past Stakeholder Engagement

4.1. Scheme Preparation Phase Engagement

The applicable legal requirements to stakeholder engagement, public consultation and disclosure are outlined in Appendix A. This process has initially comprised developing a close working relationship with the relevant ministries, regional, municipal and local authorities.

TAV has been in consultation with the local authorities regarding the proposed development option and as a result the Almaty City Akimat has established a Working Group which incorporates all relevant departments of the Almaty City Akimat. The EPC Contractor (TAV Construction) and the local design team are involved within this Working Group.

Options for the ALA expansion project were presented and discussed with the Mayor of Almaty (on 13 January 2020) and the President of Kazakhstan (on 12 May 2020). Extensive consultations were held with “Kazrestavracia” authority under the RK Ministry of Culture and Sport and international advisors from ERM Ltd. (USA) on the proposed relocation of the VIP terminal building and its cultural heritage value. A permit to relocate the VIP terminal building was granted on 11 November 2020 based on received recommendations from the national and international cultural heritage experts and advisors.

4.2. Stakeholder Engagement during the national EIA Process

The national EIA process has already been completed for the Project. The Project expert review and approval is expected to be completed at the end of August 2021. Information disclosure and public consultation activities were arranged in line with the national regulatory requirement to inform the general public, civil society organisations and other interested stakeholders of the planned development.

The initial public information disclosure event was at the virtual (online) public meeting on 28 December 2020 at 11:00 in Almaty. Adverts were placed in Kazakh and Russian in the local newspaper (“V vashi ruki”) and the website of the Green Economy Authority of Almaty (<https://www.gov.kz/memleket/entities/almaty-eco?lang=ru>) one month prior to the event identifying the date, time, link, and password of the meeting and links to the disclosed documents, and how to submit comments.

The national public hearing event (a type of consultation in Kazakhstan) was held on 17 February 2021 at 15:00 in Almaty as a virtual (online) public meeting. Similar to the initial disclosure event, advertisements were placed in the local newspaper and the website of the Green Economy Authority of Almaty (<https://www.gov.kz/memleket/entities/almaty-eco?lang=ru>) one month prior to the meeting with details of the date, time, link and password of the public meeting and links to the disclosed documents, and how to submit comments. In total, 122 people from the communities and NGOs in Almaty attended the public hearing event.

These public meetings were also used to identify any new potential stakeholders, listen to any concerns raised about the Scheme and inform the international ESIA process. The key concerns raised by the communities and NGOs were mainly associated with the relocation of the VIP terminal and its cultural heritage value. There were discussions of other scenarios, specifically integration or rehabilitation of the existing VIP terminal building as opposed to relocation, or even complete demolition, national compliance and lack of experience in relocating historical buildings and the need for the new location of the airport.

In addition to legal requirements TAV will ensure International Lenders’ standards / requirements are met in relation to the VIP building which is a list cultural heritage asset (see further details in Appendix A and through the SEP). Additional stakeholder consultations on cultural heritage are planned by the Project to address concerns regarding relocation the VIP terminal (Table 3). The findings of the cultural heritage consultation will inform the ESIA study, the Project SEP and will be disclosed to the general



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public. Other concerns included compensation measures for the trees and green hedges to be lost during site preparation and construction, birds protection as well as noise and vibration nuisance during construction for the communities living in the immediate proximity to the construction sites. Proposals were also raised about transportation modelling for the new terminal to resolve the issue of transport communication with the airport, including parking, queues and public transport accessibility. Mitigation measures have been considered by the Project design to respond to raised public concerns and management practices during construction have been developed to reduce or prevent potential construction nuisance impacts of noise and vibration.

5. Stakeholder Engagement Programme

5.1. Purpose and Goals of Stakeholder Engagement Programme

The stakeholder engagement programme ensures relevant information is disclosed to stakeholders allowing for feedback on the Project impacts and proposed mitigation. Where required, Project documentation will be amended to reflect the findings of the various methods of engagement. For engagement to be effective the Project needs to ensure that as many stakeholders as possible are reached during the engagement programme. It is noted that due to Covid-19 restrictions and controls, typical engagement method may not be appropriate especially during the early stages of the Project therefore, the SEP outlines short term and longer-term disclosure methods. Adjustments to the SEP may be required dependant on future COVID-19 restriction put in place.

5.2. Disclosure of Information

Reliable and complete Project information will be supplied to Project stakeholders in a manner that takes account specific local conditions, cultural and language preferences of local communities.

All documentation along with Project updates will be available to the public via the ALA website (<https://alairport.com>) for reading online and for download. This will be uploaded and managed by TAV. This platform will also be utilised during the operational phase of the Project providing key information such as updates on noise action plans. Given, the potential restrictions on travel and mass gatherings, interested parties will also be able to ask a question via an online form which can be submitted through the ALA's website.

Given that local residents could find reading technical texts difficult, documents will be complemented with information brochure(s) in Russian/Kazakh language. Other visual means will also be used to distribute information about the Project (posters, information boards etc.).

To effectively communicate relevant information to diverse stakeholder groups, the following documents will be disclosed as part of the national EIA and international ESIA disclosure processes:

- National EIA Report along with applicable supporting studies (in Russian);
- The Non-Technical Summary (Volume I of the ESIA Report) (English, Russian and Kazakh languages);
- ESIA Report including technical appendices (English and Russian);
- Environmental and Social Management Plan (English and Russian);
- Environmental and Social Action Plan (ESAP) (English and Russian);
- This SEP (English, Russian and Kazakh);
- Land Acquisition and Resettlement Framework (in English and Russian/Kazakh languages);
- Noise Management Plan of ALA including details of noise insulation scheme and eligibility requirements (Kazakh and / or Russian);
- Design documents for new VIP terminal building and Plan describing the preservation and enhancement options for the exiting VIP terminal (Kazakh and / or Russian)
- Disclosure of the Frequently Asked Questions (FAQ) leaflet (in English and Russian/Kazakh).

Details on disclosure methods and timelines are provided in Table 3 below.

Table 3: Information disclosure methods including COVID-19 considerations

Stakeholder	Disclosed information	Communication Method	Limitation
Land users	<p>Amendments to current airport operating procedures and plans including emergency response plans (ERPs), alternations to access points.</p> <p>Information on job security, changings to working conditions.</p> <p>Established / approved safety zones and sanitary protection zone (SPZ).</p> <p>Grievance mechanism</p>	<p>Emails to employees, operators, trade unions etc.</p> <p>Letters</p> <p>Notice boards</p> <p>Virtual meetings / Webinars</p> <p>Site inductions</p> <p>Airport website</p> <p>Press releases</p> <p>Social Media</p>	<p>Short-term engagement may not reach land users who are shielding (vulnerable) and the number of users at ALA will be significantly reduced due to partial lockdowns in Kazakhstan. This should be offset by the use direct communication and virtual / web-based communication.</p>
Local Communities including vulnerable groups Local institutions	<p>Project documentation; Non-Technical Summary (NST), grievance mechanism, EIA and associated documents, SEP, ESAP, Noise Action Plan including noise insulation scheme, Design documents for the relocation of the VIP terminal building.</p> <p>Timeline of construction with details of potential traffic delays, road closures and noisy activities.</p> <p>Employment opportunities.</p> <p>Environmental performance and monitoring results.</p> <p>Established / approved safety zones and sanitary protection zone (SPZ).</p> <p>If triggered information regarding resettlement and land acquisition including rights and entitlements, the outcomes of the planning process, as well as the schedules and procedures for implementation of the Resettlement Plan.</p> <p>Grievance mechanism</p>	<p>National and local newspapers and radio, Social media,</p> <p>Information centres / boards,</p> <p>Airport website,</p> <p>Project leaflets / letters,</p> <p>Provision of information in local library and Almaty job centre,</p> <p>In person / telephone assistance to improve understanding of the provided information and submitted documentation especially to vulnerable groups.</p> <p>Virtual community meetings.</p>	<p>Wide ranging communications method should reduce limitations even during COVID-19 restrictions.</p> <p>However, venerable groups may struggle with access or use of technology</p>
National, regional and local governments, authorities and regulators	<p>Supporting documentations / assessment for all permits / authorisations required for the Project.</p> <p>Modelling / monitoring in support of safety zones and the SPZ.</p> <p>Evidence required as a condition of permitting / approvals over the life of the Project.</p>	<p>All technical and non-technical Project documentation.</p> <p>Monitoring results.</p> <p>Email</p> <p>Virtual meetings</p> <p>Meetings with Covid-19 control as required.</p>	<p>Delivery of documentation can be by post or electronically. Meetings can be via telephone or online therefore significant limitations are not anticipated.</p>

Stakeholder	Disclosed information	Communication Method	Limitation
Organisations and personnel within the Project	NTS Tender documentation and results Contractor selection process Procurement requirements with EHS and workers protection requirements Grievance mechanism	Notice Boards Site Inductions Virtual meetings Meetings and toolbox talks (Covid-19 controls required dependant on timing) Emails	Wide ranging communications method should reduce limitations even during COVID-19 restrictions. Key personnel from each organisation to receive and disseminate information can be established
NGOs	Project information and NTS if requested. Established / approved safety zones and sanitary protection zone (SPZ). If triggered information regarding resettlement and land acquisition including the schedules and procedures for implementation of the Resettlement Plan.	Media, Airport website Emails, Meetings Telephone	Wide ranging communications method should reduce limitations even during COVID-19 restrictions.
International lenders	All Project documentation Established / approved safety zones and sanitary protection zone (SPZ). Notification if resettlement and land acquisition if triggered. Monitoring and measuring results Monthly Project updates	Emails Telephone Virtual meetings Meetings (Covid-19 controls required dependant on timing)	Small team set up and close working relationship will reduce limitations even during COVID-19 restrictions.
Mass media outlets	Project information and NTS if requested. Established / approved safety zones and sanitary protection zone (SPZ). Notification of resettlement and land acquisition if triggered.	Emails Interviews Telephone	Limitations unlikely

5.2.1. Draft ESIA Disclosure

One month prior to the Draft ESIA Report disclosure, advertisements will be placed in the local newspapers, on local radio and on the ALA website for one week identifying the date, time, access information and a link to the online public meeting, as well as links to the disclosed documents and information on how to submit comments. ALA will also place advertisements in the ACs to make sure that vulnerable groups such as the elderly, disabled, women, families who have low income or lost their main income provider, young adults, unskilled workers, and identified ethnic minorities (Oralmans and Uigurs) are aware of the events and invited. Letters of invitation will be forwarded to local environmental authorities, NGOs and other Scheme stakeholders, if relevant, to invite key stakeholders to participate in the ESIA disclosure event.

Hard copies will not be available in public places due to the risk of cross contamination with COVID-19.

NTS and SEP files in Russian and Kazakh will be made available in local Akimats (Akimat of Turksib, Zhetysu, Alatau, Almaty and Medeu urban districts, Akimat of Guldala rural okrug, Akimat of Tuzdybastau rural okrug, Akimat of Panfilovo rural okrug) and may be provided upon request. The NTS document will also be displayed on the information boards in Akimats. On-line ESIA feedback forms in Russian and Kazakh (with the option for anonymous comments to be submitted) and e-mail address will be provided by the TAV Community Liaison Officer (CLO). Comment boxes will be distributed via local Akimats to collect comments from those who experience difficulties in using on-line tools, including anonymous comments. The CLO will record the meeting, attendance and collect feedback forms and report outcomes to the ESIA Consultant. Responses will be provided to each interested party presenting questions as soon as is reasonably possible depending on the complexity of the issue and source of information needed to provide the answer. Anyone can provide their comments (including anonymously) by sending back the feedback form via postal mail or electronic mail, or by calling the CLO.

5.2.2. Disclosure of the Final ESIA Report

The Draft ESIA Report will be finalised after the 30 days of disclosure and consultation period by incorporating stakeholder comments and queries in the ESIA Report as necessary. A comment and response table will also be released providing information about how the final ESIA has taken into consideration the feedback provided by stakeholders. The Final ESIA Report and documentation will be disclosed via the ALA website (<https://www.alaport.com>).

5.2.3. International Disclosure

International disclosure of the draft ESIA package will be undertaken via the EBRD (www.ebrd.com) and IFC (www.ifc.org) websites in English and Russian languages for a period of 30 days, in accordance with the EBRD Environmental and Social Policy and IFC Environmental and Social Sustainability Policy for category B Projects. Any comments that will arrive via this mechanism will be shared with ALA/the Project Sponsor and ESIA Consultant and will be considered to inform the Final ESIA. Responses will be provided to each interested party presenting questions, comments or opinions. Following the 30-days disclosure period and the updating of the ESIA to address stakeholders' comments and queries that will be received by Lenders', the ESIA documentation will be finalised. The final ESIA package will be disclosed on the Lenders' websites via same links used to disclose the draft ESIA package. Hard copies of the full ESIA documentation will be made available locally at the locations detailed in Table 3.

5.3. Consultations

During the Project lifecycle there will be requirements for consultation with the key stakeholders only as well as events which will include all or selected stakeholder groups. Selected group events include meetings held to address specific issues and problems that are of interest for specific stakeholder groups, including for example, employee updates and local workforce recruitment at various stages of the Project, cultural heritage consultation and focus group discussions, etc.

The general-purpose events include public consultations held to discuss the Project documentation in line with the International Lenders' requirements and public hearings organised in line with national legislation.

Public consultations may be difficult due to COVID-19 control measures especially in the earlier stages of the Project. It is unlikely that large gatherings could be conducted safely therefore virtual meeting may be more appropriate during COVID-19 restrictions. The consultation meetings will be announced in the local, and regional media.

5.4. SEP Updates

The SEP is a live document and will be reviewed and updated as necessary to reflect changes in stakeholders and engagement requirement, which could be triggered through changes in legislation or Project development particulars. As the Project progresses the need may arise choose additional external and internal communication methods or disclose more information that is outlined in this SEP. The stakeholder engagement log will be updated and disclosed quarterly.

5.5. Minority and Vulnerable Groups

Gender, age and disability considerations have also been undertaken in the preparation of this SEP and the future engagement methods outlined. Engagement activities are designed to be accessible to all in both terms of location and time.

Elderly and disabled members of the community may find it difficult to access information online which will be one of the preferred option during Covid-19 restrictions. There may also be mobility restrictions on these stakeholders which could impact their ability to attend meeting or access hard copies of documentation. As such, engagement channels will include radio broadcasts and newspaper adverts. In addition, community centres will also be used to display Project information. A dedicated link will be created on ALA website www.alaport.com to receive comments and / or grievances. All buildings utilised for stakeholder engagement meetings will be accessible to those with wheelchairs.

Women within the local communities may also be restricted in relation to time which can be allocated to attending events and accessing information. Information will readily be available online and can be accessed at any time. TAV will also give consideration to ensure information is displayed and meetings are held in accessible locations and timeframes that can accommodate family life and household responsibilities.

The CLO will monitor feedback from vulnerable groups and additional ways of engaging them in the decision-making process will be developed as required.

5.6. Stakeholder Engagement Programme

The table below presents a summary of proposed stakeholder engagement activities.

Table 4: Proposed Stakeholder Engagement Programme

No.	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
A. Internal Procedures							
A1	Approve SEP	Ensure suitable stakeholder engagement methodology is in place.	-	All stakeholders (identified in Table 2)	By November 2020	TAV	
A2	Consult on and disclose amendments to current ALA operating procedures and plans including emergency response plans (ERPs), alternations to access points, information on job security, changings to working conditions and Covid-19 controls and actions.	To provide information on the Project and to consult on updates to working procedures.	<u>During Covid-19 restriction:</u> Email Letters Notice boards Virtual meeting / webinars Online survey's / comments boxes Toolbox talks / meeting (small scale) <u>After Covid-19 restriction:</u> Health, safety and environment Committee meetings Meetings	Land users	On purchase of ALA and as the Project progresses .	TAV	
A3	Consult on and disclose updates to emergency response plans. Provide details on access restrictions to areas of the site and timetables for high risk activities and any emergency services support required.	To provide information on the Project and site changes / restriction and to plan for high risk activities.	<u>During Covid-19 restriction:</u> Email Letters Virtual meeting / webinars <u>After Covid-19 restriction:</u> Meetings	Emergency services (on and off site)	Prior to construction and updates as required.	TAV TAV construction and subcontractors	
B. Preparation Stage							

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
B1	Establish Project webpage as part of the existing ALA website including creating a platform on the website for Q&As and raising grievance.	Creation of platform for disclosure of information and stakeholder engagement	-	All stakeholders	By December 2020	TAV	
B2	Implement the grievance mechanism including raising awareness of the process and appointing personnel.	Collect stakeholders view and concerns	Airport website Press release Social media Notice boards in local libraries, community centres and council buildings	All stakeholders	2021	TAV	
B3	Start disclosure campaign; publish information through the ALA website (document downloads, overview of the Project and details of the grievance procedure) and provide hardcopies at council and airport offices. This should initially include the National EIA documentation and draft ESIA disclosure package (NTS, ESIA Report, ESMP, ESAP, SEP, LARF). During Covid-19 restrictions emphasis will be on online provision of information supported by hard copy information at airport offices and community / council buildings.	Provision of information to inform stakeholder engagement on the Project.	Airport website Airport office Council offices Telephone / Post Community / council buildings	All stakeholders	2021	TAV	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
B4	Disclosure of information regarding the relocation of the VIP terminal building providing details on the proposed design and heritage interpretation plan with the support of ERM.	Provision of information to inform stakeholder engagement on the assessment and preservation of cultural heritage.	Airport website Press release Notice boards in local libraries, community centres and council buildings Social media	Local residents Local and national academics and historians.	2021	TAV	
B5	Engagement with the key stakeholders on cultural heritage issues relating to the VIP terminal relocation	To encourage sharing opinions, feedback and to understand / mitigate for stakeholder concerns regarding the VIP terminal relocation.	Stakeholder meetings FGDs meetings On-line meeting/video conference during Covid-19 restrictions Stakeholder engagement programme for the VIP terminal. Disclosure of the findings	NGOs Cultural heritage activists Regulators	Continuous	ALA/TAV/CL O Cultural Heritage Consultant	
B6	Disclosure of noise action plan including details of noise insulation scheme, eligibility criteria, planned monitoring and noise complaints process.	To ensure all stakeholders are aware of TAVs plans to manage, monitoring and mitigate against noise nuisance. To ensure relevant stakeholders are aware of the noise insulation scheme.	Airport website Press release Social Media Notice boards in local libraries, community centres and council buildings Consultation meetings (online and physical ones)	Local communities including residents within the noise action plan area.	2021 and update as required.	TAV	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
B7	Disclosure of information in collaboration with the relevant Regulators on the establishment of the sanitary protection zone and public safety zone / area, including mapping and mitigation measures implement to reduce impacts on public health.	To ensure all stakeholders are aware of zoning and restrictions to future development.	Airport website Consultation meetings with local communities	Local communities including residents within the SPZ and PSZ/PSA.	By 2023	TAV	
B8	If triggered disclosed LARF.	To ensure all stakeholders are aware of resettlement framework.	<u>During Covid-19 restriction:</u> Mass media Letters Community notice boards Telephone Council / community offices Webinars / virtual meetings If in person meetings are required social distancing and other Covid-19 control will be implemented.	Local communities including residents within the SPZ and PSZ/PSA.	As required	TAV	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
B9	<p>Allocate resources, establish provisions and undertake public consultations. Public announcements will be made disclosing information including an overview of the Project, details of how to provide feedback and location of Project documents (downloadable and hardcopies).</p> <p><u>After Covid-19 restriction:</u> Establish venues and hold stakeholder meeting. The date and venue of the hearings will be agreed (with the local regulator) and a public announcement will be made 20 days prior to the hearing within local / national media.</p>	<p>To disseminate information and receive feedback / questions.</p>	<p><u>During Covid-19 restriction:</u> Mass media Letters / leaflets Community notice boards Telephone Council / community offices Webinars / virtual meetings If in person meetings are required social distancing and other Covid-19 control will be implemented.</p> <p><u>After Covid-19 restriction:</u> Large scale meetings</p>	All stakeholders	Immediately and update as required.	TAV	
B10	<p>Consult and disclose all legally required information to the Regulators in relation to Project permits and approvals.</p> <p>Provide validation documents and any documents / monitoring results required as a conditions of permits / approvals.</p>	<p>Obtain required permits and approvals.</p>	<p>Post or electronic delivery of documents.</p>	Public authorities and regulators	During the planning phase and as required thereafter.	TAV	
B11	<p>Collate stakeholder comments and publish findings.</p>	<p>To encourage feedback and to understand / mitigate for stakeholder concerns.</p>	<p>Grievance mechanism ALA website</p>	All stakeholders	On-going	TAV/CLO	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
B1 2	Disclose updated reports and plans (if applicable) based on public consultations and the grievance mechanism.	Provision of information to inform stakeholders on the consultation findings, key concerns/grievances raised and response measures.	ALA website	All stakeholders	Post consultation	TAV/CLO	
B1 3	Issue letters to local residents and business outlining the construction timetable highlighting time restrictions on activities generating noise and any planned road closures, etc. Provide links to or details of grievance mechanism. Publish letter on the airport website and display on notice boards at the airport and in community buildings.	To notify local communities of construction works especially activities with high nuisance risks.	Letters Airport website Notice boards	Local Community	Prior to construction, updates during construction should the programme change.	TAV, TAV Construction and subcontractors	
B1 4	Develop procurement and contractor control procedures for the Project. Issue and review tender documentation and appoint contractors. Provide quarterly updates as required throughout the Project.	To disseminate Project and procurement requirements, contractor / supplier controls and the grievance mechanism etc.	Internet Emails Telephone Site visits with Covid-19 controls implemented.	Organisations and personnel within the Project	Prior to construction and quarterly updates	TAV TAV construction	
Construction Stage							
C1	Preparation and disclosure of the FAQ leaflet.	Facilitate understanding of the Project in the local communities	ALA website. The FAQ leaflet in Russian/ Kazakh to be made available in hard copy in the local communities via local Akimats	Local communities	Prior to construction and quarterly updates	TAV/CLO	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
C2	Develop and implement a written Project communication procedure. Establish site notice boards.	To disseminate information on environmental and H&S requirement and performance, worker protection and the grievance mechanism etc.	Information boards Meetings / toolbox talks site inductions Emails Intranet	Construction workers and other site users as necessary.	Prior to construction, monthly updates during construction	TAV TAV construction and subcontractors	
C3	Continue to collect and monitor stakeholder comments and grievances.	Monitoring stakeholder opinion on the Project implementation and incorporate changes as required.	Grievance mechanism ALA website	All stakeholders	During the full construction phase	TAV TAV construction and subcontractors	
C4	Updating SEP Update stakeholder engagement log	Updating stakeholders and engagement methods, keeping records of stakeholder engagement activities.	ALA website E-mail communications with local Akimats.	All stakeholders	SEP updated - prior to the start and at the end of construction, when any changes to the Project occur Stakeholder engagement log – quarterly updates	TAV/CLO	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
C5	Annual E&S reporting	Project specific annual report summarising Project E&S performance, CLO's activities including grievances and updates to the SEP.	On-line reporting and e-mail communications	International Lenders	Annually	TAV/CLO	
Operation Stage (dates to be confirmed, given construction is a 24month programme unlikely to be significantly impacted by the COVID-19 pandemic)							
D1	Monitoring of grievance mechanism	Monitoring stakeholder opinion on the Project implementation especially in relation to noise and incorporate changes as required.	Grievance mechanism	All stakeholders	During full operational phase	TAV	
D2	Inform site users of changes to internal plans and processes	Provide stakeholders with updated information including emergency response plans, access arrangements and operating procedures	Signage on site Employee / contractor / union / operator meetings Emails / letters / SMS Formal and informal training	Site users and emergency services	During full operational phase	TAV	

No	Activity	Objectives	Engagement Mechanisms	Stakeholders	Timeframe / Frequency	Responsible Parties	Status
D3	Information on environmental performance especially in relation to continuous noise monitoring.	Provide stakeholders with details of monitoring results and any subsequent changes to the noise action plan.	Stakeholder engagement meetings	All stakeholders	During full operational phase	TAV	
D4	Updating SEP	Updating stakeholders and engagement methods, keeping records of stakeholder engagement activities.	ALA website.	All stakeholders	Annually	TAV/CLO	
D5	Annual E&S reporting	Project specific annual report summarising Project E&S performance, CLO's activities including grievances and updates to the SEP.	On-line reporting and e-mail communications	International Lenders	Annually	TAV/CLO	



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6. Grievance Mechanism

6.1. Purpose

The grievance mechanism process or procedures should address concerns promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all segments of the affected communities, at no cost and without retribution. The mechanism, process or procedure must not prevent access to judicial or administrative remedies. The project proponent will inform the affected communities about the grievance process in the course of its community engagement activities, and report regularly to the public on its implementation, protecting the privacy of affected individuals.

Handling of grievances should be done in a culturally appropriate manner and be discreet, objective, sensitive and responsive to the stakeholders' needs and concerns. The mechanism should also allow for anonymous complaints to be raised and addressed.

6.2. Grievance Mechanism

TAV will have the overall responsibility for collecting and processing comments/complaints and responding to any such comments and complaints. Depending on the nature of a comment/complaint support may be required from a multi-agency aviation safety committee.

6.2.1. Community Liaison Officers

TAV has appointed a Community Liaison Officer. The CLO will be responsible for community liaison and arranging communications with the Project-affected communities throughout the preparation, construction and operation phases. The CLO will document and record all stakeholder engagement as detailed within the SEP and will evaluate stakeholder engagement performance to inform respective SEP updates. The CLO will be responsible for implementation of the SEP and receiving and channelling comments and concerns. The CLO will be attending and recording stakeholder engagement activities and maintain the grievance mechanism. The CLO will report to the ALA/TAV management. The EPC Contractor will assign its own CLO to interact with sub-contractors' workforce and local communities as necessary. Contact details of the CLOs are provided in Table 5 below.

6.2.2. Grievance Redress Mechanism

In order to respond (in a timely manner) to any concerns and complaints particularly from affected stakeholders and communities the International Lenders require a permanent grievance mechanism to be established and maintained. The grievance mechanism covers both employees and non-employees (i.e. affected people and other relevant stakeholders).

As part of this SEP a formal grievance mechanism is outlined for comments and questions about the Project and an institutional framework with designated roles and responsibilities to manage the process. Consideration has been given to the current and potential future restrictions in place due to COVID-19 controls.

Special care will be focused on the training of the designated staff involved in the management of the grievance mechanism. In addition, an appeal procedure for complainants who reject TAV's intended action to redress a grievance will also be in place. TAV will establish a Grievance Review Committee (GRC) to hear appeals, members will include the Project CLO, corporate communications department, customer relations department, construction manager, operation manager, etc.

Any comments or concerns can be submitted to TAV via CLOs in writing (by post, e-mail or by filling in a grievance form (example included – Appendix A)) or verbally by telephone. Both signed and anonymous grievances will be accepted. However, if the person filing a grievance wants to receive a direct written

reply, they must provide reliable contact details. As details of grievance will be published online the response to all including anonymous grievances will be visible.

The grievance form will be made available at the airport, in the local authority office, schools, community centres and other public places that are easily accessible for all relevant stakeholders, alongside a description of the grievance mechanism. In addition, as noted previously an online system will be established on the ALA website. Grievance forms can then be submitted to the contact details provided in Table 5 below.

Table 5: Contact Details

Name	Yuliya Allakhverdiyeva	Saltanat Mukasheva
Position	TAV CLO	EPC Contractor CLO
Email	yallakhverdi@alairport.com	TBN
Telephone		
Address	Almaty International Airport	TAV Construction

Due to COVID-19 restriction an online version of the grievance form and details of the procedure will be available on the airport website.

All grievances will be acknowledged within 7 working days and a formal response identifying remediation measures, if appropriate will be made within 30 working days.

If a resolution cannot be achieved, the complainant can appeal to the GRC.

If the complainant rejects a decision of the GRC, then recourse to judicial or administrative procedures remains open to the complainant (legal or administrative resolution of the grievance).

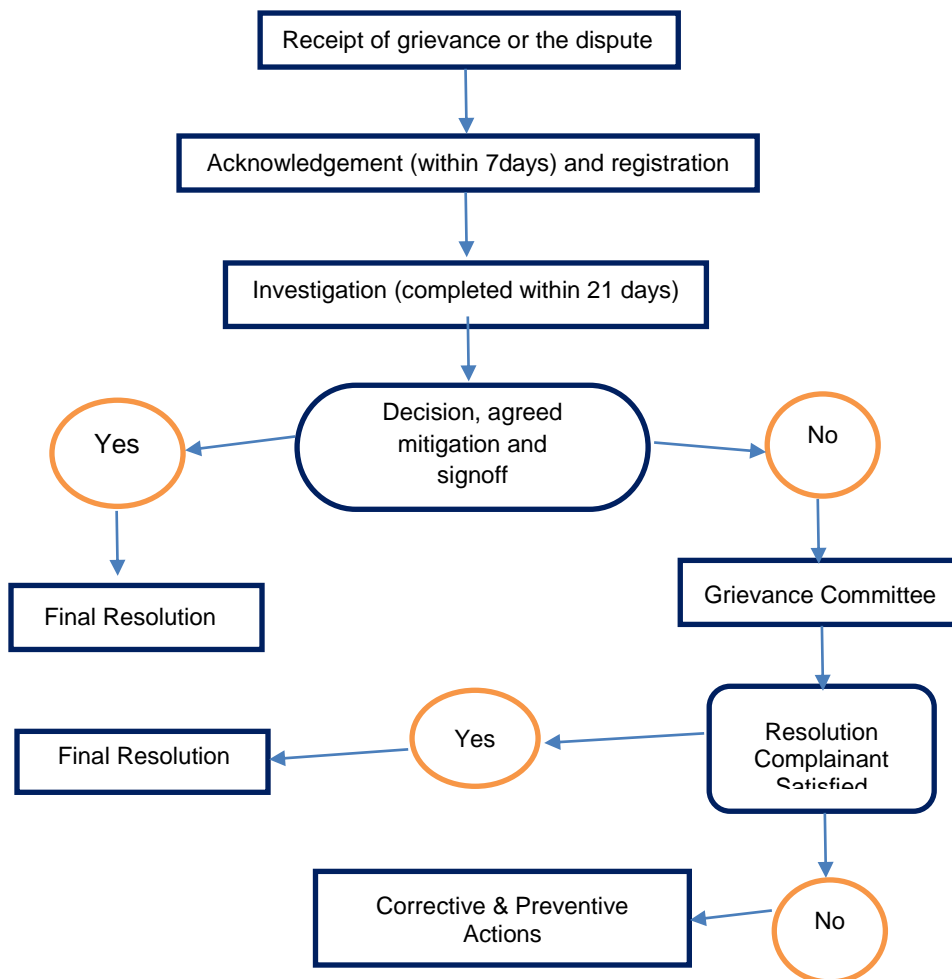
Trained members of staff will maintain a grievance log which will include:

- Stakeholder name and contact details; and
- Details of the grievance and how and when it was submitted, acknowledged, responded to and closed out.

Individuals can request the right to have their name kept confidential and this mechanism does not preclude the right for stakeholders to process grievances through other judicial means. All information will be stored in line with national data protection regulations.

All claims and answers will be also posted on the website.

Figure 4: Grievance Management Flow Chart



7. Monitoring and Reporting

Successful stakeholder engagement is on-going throughout the Project and requires performance monitoring, analysis and disclosure of information allowing adaption to changing circumstances and stakeholder information needs.

TAV Airport Holdings will implement the SEP and monitor / analyse its efficiency.

7.1. Monitoring and supervision

The following initial indicators will be used for monitoring and improving stakeholder engagement performance in support of Project implementation and to ensure compliance with lender standards / requirements:

- Number of public consultation participants;
- Number of publications on the Project implementation process in local, regional, and national media;
- Number of stakeholder comments and suggestions received through various feedback channels;
- Type/category of stakeholder comments and suggestions addressed by TAV and through what means;
- Number of stakeholder grievances and claims regarding the Project;
- Key categories of grievances received (land use, environmental issues, labour relations, etc.);
- Number of grievances resolved, outstanding and appealed;
- Audits / supervision by culture heritage consultants;
- Audits by labour consultants (at least twice during the Project life cycle);
- Noise monitoring results;
- Results of aviation safety modelling;
- Enquires in relation to the noise insulation scheme; and
- If displacement is triggered monitoring of the LARF by resettlement consultants.

TAV will maintain communication channels with stakeholders as identified in this Plan. Additionally, update information on Project activities will be provided on the airport website as well as the defined engagement mechanisms (Table 4) and other media tools.

7.2. Reporting

TAV will publish details of stakeholder engagement including issues raised, and mitigation actions undertaken by TAV. In addition, quarterly reporting will be provided by TAV on the implementation of the ESAP.

TAV will prepare an annual report on the social and environmental performance of the Project throughout the life of the Project for International Lenders.

7.3. Resources and Responsibilities

The overall responsibility for implementing this SEP lies with TAV and the Project CLO. A key task is to ensure adequate recording of stakeholder comments and existence of a clear auditable 'trail' showing the comments, their source and how they were considered in the development of Project documentation.

TAV will ensure that a senior staff member will attend all consultation events and will appoint a Project Manager (PM), who is responsible for overseeing and coordinating all activities associated with stakeholder engagement. In addition, a full time Environmental and Social (E&S) Manager will also be appointed with the responsibility for the day to day delivery of ESAP.

Where required TAV will commission specialist consultants / advisors to support in the development of plans / designs and undertake monitoring, assessments and audits. These will include but are not limited to a cultural heritage technical adviser, a noise consultant, an aviation safety consultant and land settlement (if required).

TAV has appointed a full time CLO to manage implementation of the SEP including but not restricted to consultations on the relocation of the VIP terminal building, noise insulation program and LARF (if required). In addition, the CLO will identify points of contact in the popular local and regional newspapers, radio and TV channels, provide them with initial project information and include them in the mailing list about future events. This will also be mirrored for representatives of the environmental and social local and national organisations that could express interest in the Project.

The CLO will support the local Akimats who share the overall responsibility for handling the consultation and information disclosure process, including organisation of the consultation process, communications with identified stakeholder groups, collecting and processing comments/complaints and responding to any such comments and complaints. The CLO will cover all Akimats (establishing key contacts for each), however, should further support be required additional appointments will be made by TAV. The development of public safety areas/zones will require consultation with Multi-agency aviation safety to deal with zoning and support with associated consultations for complaints/feedback.

Key stakeholder engagement tasks to be undertaken by TAV personnel or appointed advisors:

- Approve the content of the draft SEP (and any further revisions);
- Implement cultural heritage measures with the support of appointed advisors;
- Develop and validate the SPZ;
- Agree modelling methodology and establish public safety zones / areas;
- ESIA consultation process (if required by the Regulator);
- Implement and disclose the noise management / monitoring programme;
- Review and approve information disclosure materials;
- Provide timely approval for the allocation of resources and distribution of disclosure materials;
- Where required send formal written invitations to workshops and other stakeholder events;
- Identify and organise meeting/event venues with appropriate technical and welfare facilities;
- Arrange and manage transport for selected stakeholders (limited to venerable Community stakeholders) so that they can attend meetings/events;
- Provision of responses to comments from members of the public, government authorities, media and NGOs;
- Review and sign-off minutes of all engagement events;
- Grievance mechanism administration;
- Managing information for disclosure (with periodic updates) on the airport's website;
- Collation and analysis of all stakeholder comments/concerns received via email or via Company



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website;

- Collation and analysis of grievances received (as per the Grievance Mechanism presented above in section 6); and
- Quarterly reporting on SEP implementation progress.

APPENDICES

A. Regulations and Requirements

EBRD and IFC Project Categorisation and Requirements

Project Categorisations

Under the EBRD Environmental & Social Policy (2008), projects can be categorised as A, B, C or FI based on environmental and social criteria. It is understood EBRD have Categorised the Project as B which indicates that the project has the potential to result in adverse environmental and social impacts which are typically site specific and readily identified and addressed through mitigation measures.

Under the IFC's environmental and social screening criteria, a project can be categorised as A, B or C, depending on the level and significance of expected environmental and social impacts, to reflect the magnitude of impacts understood as a result of assessment. It is understood the Project has been defined as a Category B project which indicates that there is the potential for limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.

EBRD Requirements

EBRD's Performance Requirement (PR) 10² requires that *"for projects that are likely to have adverse environmental or social impacts and issues, the client will develop and implement a SEP appropriate to the nature and scale or the risks, impacts and development stage of the project. For any project that requires an Environmental and Social Impact Assessment (ESIA), the SEP will apply the disclosure and consultation requirements"*.

PR10 contains the following provisions:

- SEP: Development of a SEP in order to outline how communication with identified stakeholders will be handled throughout Project preparation and implementation;
- Information disclosure: Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project;
- Meaningful consultation: If employees and/or affected communities will or may be exposed to significant risks or adverse impacts from the project, meaningful consultation will be undertaken in a manner that provides stakeholders with opportunities to express their views on project risks, impacts, and mitigation measures, and allows the project proponent to consider and respond to them; and
- Grievance mechanism: The project proponent will need to be aware of and respond to stakeholders' concerns related to the Project in a timely manner. For this purpose, an effective grievance mechanism to receive and facilitate resolution of stakeholders concerns and grievances will be established.

In addition, EBRD have prepared a Covid-19 Stakeholder Engagement Briefing Note³ which may be of significance to the Project especially in the early stages. This note presents considerations for continued effective information disclosure and stakeholder engagement during the pandemic taking into account mandatory restrictions and social distancing measures implement. Guidance in this document has been incorporated with this plan and will be reviewed during the course of the programme and as local and global developments in the pandemic unfold.

² EBRD Performance Requirement 10 – Information Disclosure and Stakeholder Engagement, May 2014

³ EBRD Performance Covid-19 Stakeholder Engagement Briefing Note, 15 April 2020

Due to the historic listing of the VIP terminal building PR8 is also a significant requirement. PR8⁴ allows for the adoption of a mitigation hierarchy approach to protect cultural heritage from adverse impacts. Heritage specialists ERM found the VIP building was to be of replicable cultural heritage therefore, the building is suitable for deconstruction and relocation within the airport boundary (subject to conditions and approval from the Regulator). Paragraph 15 of the PR states:

Where a project may affect cultural heritage, the client will consult with affected communities within the host country who use or have used the cultural heritage within living memory for longstanding cultural purposes to identify cultural heritage of importance, and to incorporate into the client's decision-making process the views of the affected communities on such cultural heritage. The client will provide information to affected communities in a transparent and appropriate language on the scope, location and duration of a project, and any activities that might involve impacts on cultural heritage. Such consultation must follow the requirements of PR 10 and could be part of a wider consultation process on the project's environmental and social impacts. Consultation will also involve other relevant stakeholders such as national or local authorities entrusted with protection of cultural heritage, cultural heritage experts and non-governmental and civil society organisations. Impacts on cultural heritage will be appropriately mitigated with the free prior and informed participation of the affected communities.

The Project currently does not require land acquisition and resettlement. However, a Land Acquisition and Resettlement Framework (LARF) has been developed for the Project to cover any potential land acquisition related to the operation of the airport imposed by the GoK in the future.

Should EBRD PR5⁵ (Land Acquisition, Involuntary Resettlement) be triggered in the future. The following statement will be applicable to the Project:

Following disclosure of all relevant information, the client will consult with affected persons and communities, including host communities, and facilitate their early and informed participation in decision-making processes related to resettlement, in accordance with PR 10:

- *Affected persons shall be given the opportunity to participate in the negotiation of the compensation packages, eligibility requirements, resettlement assistance, suitability of proposed resettlement sites and the proposed timing.*
- *Special provisions shall apply to consultations which involve individuals belonging to vulnerable groups. Consultation will continue during the implementation, monitoring, and evaluation of compensation payment and resettlement so as to achieve outcomes that are consistent with the objectives of this PR.*

The grievance mechanism to be established by the client in accordance with PR 10 will be set up as early as possible in the process, consistent with this PR, to receive and address in a timely fashion specific concerns about compensation and relocation that are raised by displaced persons and/or members of host communities, including a recourse mechanism designed to resolve disputes in an impartial manner. A summary of complaints and the measures taken to resolve them shall be made public on a regular basis, in accordance with PR 10.

IFC Requirements

The requirements for consultation with the external stakeholders are defined in the IFC Social and Environmental Sustainability Policy and in the respective IFC Performance Standards and Guidelines.

According to the IFC requirements, public consultation should be carried out in the process of preparing the ESIA document on environmental and social aspects of the Project. Consultation should be conducted as early as possible and the relevant project-related information should be made accessible in

⁴ EBRD Performance Requirement 8 – Cultural Heritage, May 2014

⁵ EBRD Performance Requirement 5 – Land Acquisition, Involuntary Resettlement and Economic Displacement, May 2014

advance. Based on the outcome of the consultations, the attitude of the stakeholders should be taken into consideration and consultation should be carried out as required during the life of the Project.

The IFC publication “Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets”¹ can be used as guidance. The handbook describes key stakeholder engagement principles and approaches (in accordance with the IFC’s performance standards) and provides concrete examples of implementing these approaches in different countries.

The key principles are summarised below:

- targeted to those most likely to be impacted and involve all representatives of local communities (including women, aged people, children, etc.);
- be initiated at an early stage to scope key issues and have an effect on project decisions;
- be free of external manipulation, interference, or coercion, and intimidation;
- be informed as a result of the adequate dissemination of information in advance;
- be based on timely, actual, understandable and accessible information available in the language preferred by the affected communities;
- incorporate two-way dialogue that gives both sides the opportunity to exchange views and information, to listen, and to have their issues heard and addressed;
- be documented and include clear mechanisms for responding to people’s concerns, suggestions and grievances in a timely manner;
- incorporate where appropriate and feasible, feedback into project or programs design and reporting back to stakeholders; and
- be ongoing as required during the life of the project.

IFC have also produced guidance⁶ to assist clients in identifying alternative approaches and mechanisms for engaging stakeholders for continuing to deliver project-related information to the communities within their areas of operations and for receiving feedback, while taking all feasible steps to protect the health and safety of those involved. Guidance in this document has been incorporated with this plan and will be reviewed during the course of the programme and as local and global developments in the pandemic unfold.

Due to the historic listing of the VIP terminal building PS8⁷ is also a significant requirement. As noted above, heritage specialists ERM found the VIP building was to be of replicable cultural heritage therefore, the building is suitable for deconstruction and relocation within the airport boundary (subject to conditions and approval from the Regulator). Paragraph 9 of the PS states:

Where a project may affect cultural heritage, the client will consult with Affected Communities within the host country who use, or have used within living memory, the cultural heritage for longstanding cultural purposes. The client will consult with the Affected Communities to identify cultural heritage of importance, and to incorporate into the client’s decision-making process the views of the Affected Communities on such cultural heritage. Consultation will also involve the relevant national or local regulatory agencies that are entrusted with the protection of cultural heritage.

As noted above the Project currently does not require land acquisition and resettlement. However, if this changes due to future operations or designation PS5⁸ will be triggered and the following requirement will

⁶ Interim Advice for IFC Clients on Safe Stakeholder Engagement in the Context of COVID-19

⁷ IFC Performance Standard 8 – Culture Heritage, January 2012

⁸ IFC Performance Standard 5 – Land Acquisition and Involuntary Resettlement, January 2012

be met:

The client will engage with Affected Communities, including host communities, through the process of stakeholder engagement described in Performance Standard 1⁹. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of this Performance Standard.

The client will establish a grievance mechanism consistent with Performance Standard 1 as early as possible in the project development phase. This will allow the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.

Kazakhstan National Requirements

The Aarhus Convention establishes the rights of the public with regard to the environment including access to information, public consultation in decision making and to raise complaints when there is a perception that considerations of environmental issues are insufficient. In 2000 the Republic of Kazakhstan ratified the Aarhus convention (Kazakhstan Law on ratification No 92-II dated 23 October 2000).

The Environmental Code of the Republic of Kazakhstan (2007) requires public hearings to ensure the provision of information during the EIA (OVOS) process, the State Environmental Review (SER) process and public participation in decision-making on the issues of environmental protection and use of natural resources.

Public hearings are required for projects which may directly impact human health and the environment.

All interested members of the public and public associations should be given an opportunity to express their opinion during the EIA (OVOS) process prior to submittal of the Project for State Environmental Review.

The Order of the Kazakhstan Ministry of Environmental Protection (No 135, dated 7 May 2007 (with amendments and additions of September 8, 2017)) "On Approval of Rules for Conducting Public Hearings" requires public hearings for projects which may directly impact human health and the environment. Public hearing participants usually include; the general public, non-government and community organisations, regulatory bodies and local / national media.

Regulations require that during all stages of the EIA interested parties are made aware of the process, information is provided and feedback is possible. Interested parties should also be provided access to EIA documentation / studies. It is noted exemptions may be made to disclosure of information under other public Kazakhstan legislation for example due to national security concerns.

The developer is responsible for organisation and financing of the hearings and for providing the required technical support and information. The date and venue of the hearings should be agreed by Developer with the local regulator and a public announcement should be made 20 days prior to the hearing within local / national media. The announcement should also provide interested parties with details of where EIA material / studies can be viewed (the material must be made available from the date of the announcement). Additional means of notification can also be used.

⁹ IFC Performance Standard 1 – Assessment and Management of Environmental and Social Risks and Impacts, January 2012

Public hearings must commence regardless of the number of interested parties attending. Attendees can ask questions, express their concerns during the course of the hearings. The developer presents EIA results and will answer all questions raised by the public or other participants.

Minutes of the hearings must be documented and the developer may decide to improve environmental and social aspects of the Project based on the finding of the hearings, incorporating public opinion.

The developer should perform an analysis of the public hearings' results and decide whether the Project requires amendments based on public concerns / recommendations. After the public hearings, the Developer submits the package of documents to the State Environmental Review – minutes of the public hearings, project documents including EIA with due consideration of public concerns if any, Also comments should be submitted if the Developer considers some public recommendations/concerns not sufficiently substantiated to be taken into account.

After passing SER the conclusion of SER shall be sent by the developer to be posted on the internet resource of the local executive body in the field of environmental protection within five working days after its receipt.

Individuals and legal entities have the right to appeal the conclusion of the SER.

EU Directives

The Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU) allows the competent authority to scope what information should be covered by the developer within the EIA. After which the developer must provide information on the environmental impact in the form of an EIA report. The process requires the environmental authorities and the public to be informed and consulted on the Project and the competent authority will take into consideration the results of consultations. The public must then be informed of the decision and can challenge it through the courts.

The objective of the aforementioned Directives is to provide a high level of protection of the environment and to integrate environmental considerations into the design / development of projects, plans and programmes with a view to reduce environmental impacts. In addition, it ensures public participation in decision-making.



Grievance Form

Personal Details

Details of complainant
First name: _____
Surname: _____
I wish to raise my grievance anonymously
I request my identity is not disclosed to other parties

Contact details
By Post to _____
Please confirm the requested method of response
By telephone _____
By email _____

Preferred language for communication
Kazakh
Russian
English

Description of the Incident or Grievance

Date(s)

Occurrence
Single occurrence
Multiple occurrence (please state number of occurrences)
On-going

Details of Incident
What, where, affected persons and impacts

Recommended actions
Please provide details for consideration in resolving this issue

For official use only.

Reference No.:





B. Grievance Log

Reference No	Name & contact details	Date received	Details of complaint / comment	Responsible party	Actions taken	Date closed



C.

