

KAZAKHSTAN

AKTOBE WWTP MODERNISATION PROJECT

ENVIRONMENTAL AND SOCIAL ACTION PLAN



July 2023

LIST OF ACRONYMS AND ABBREVIATIONS

ASEG	Aqtobe Su Energy Group
CDP	Corporate Development Programme
CESMP	Contractor's Environmental and Social Management Plan
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
GBVH	Gender Based Violence and Harassment
GHG	Greenhouse Gas
OHS	Occupational Health and Safety
PR	Performance Requirements (EBRD)
SEE	State Environmental Expertise
SEP	Stakeholder Engagement Plan
WW	Wastewater
WWTP	Wastewater Treatment Plant

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PR1	Assessment and Management of Environmental and Social Risks and Impacts						
1.1	<p>Complete the national level EIA and submit to SEE, as well as the associated public consultation process.</p> <p>Assess if any design changes made in the final detailed design mean that environmental and social impacts must be re-assessed in the detailed design document.</p> <p>Ensure that the necessary authority approvals are obtained for the project construction and operations.</p> <p>At the construction stage, this will also include permits for on-site contractors such as concrete plant contractors.</p> <p>Obtain the required permits to operate the WWTP and all associated activities.</p> <p>Assess the prudence of obtaining State Environmental Insurance cover for the project and obtain if prudent.</p>	<p>The identification and prioritisation of the project's environmental and social impacts is an essential step towards planning management measures to address the impacts.</p> <p>There is uncertainty about the integrity of the URE reservoir dam. Increased saturation of the dam with water has increased the risk of dam failure.</p>	Legislative EBRD PR1, paragraphs 9-17 Best practice	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time to allow for alignment with EBRD initiated ESIA, including disclosure and consultation process.	A completed national EIA. Authority approvals and permits in place. A third-party dam integrity and safety assessment conducted for the URE reservoir.	
1.2	<p>ASEG to establish an Environmental and Social Management System (ESMS) framework and strengthen its E&S capabilities to go beyond legal compliance and towards proactive E&S management in line with good international practice (ISO inspired) and continuous improvement.</p> <p>This will include establishing the necessary strategies, procedures, etc. for an ESMS and by improving dissemination and environmental training related to E&S management.</p> <p>This also includes establishing, maintaining and strengthen an organisational structure that defines roles, responsibilities, and authority to implement the corporate and project ESMS.</p>	The ESMS is the overall platform for the client and the contractor to ensure that the environmental and social impacts of the company, and hence the proposed project are adequately managed.	EBRD PR1, paragraph 18 Good international practice ISO 14001 ISO 45001	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start, as applicable.	Description of ESMS including roles and responsibilities for E&S management at the corporate level and during project construction and operations. Corporate E&S Policy. ESMS procedures in line with ISO standards.	

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	Furthermore, this includes allocation of adequate human and financial resources and that those responsible are suitably qualified and trained.					E&S training procedure and schedule for employees.	
1.3	ASEG to adopt and implement the ESMP stemming from the ESIA in full, during pre-construction, construction, and operation phases of the proposed project. This includes amongst other assigning responsibilities for ESMP activities and links to the overall ESMS.	The ESMP is the plan of action to address the proposed WWTP project's identified environmental and social impacts during construction, operation, and decommissioning, based on the ESIA.	EBRD PR1, paragraphs 20-23	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction start	Formal commitment to implement ESMP and assignment of key responsibilities for its implementation.	
1.4	The Corporate Development Programme (CDP) consultants shall build capacity at ASEG to facilitate their implementation of the ESMS and ESMP. The contractors/suppliers shall develop operations and maintenance manuals for newly installed equipment in conjunction with the projects and train ASEG staff in the correct operation and maintenance. This shall include proper maintenance schedules, environmental, health and safety aspects, and emergency measures.	Optimisation of the management of the environmental, social, and health & safety management	EBRD PR1, paragraph 24-25	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable.	Description of organisation for ESMS implementation, see 1.2 above.	
1.5	The environmental and social requirements and actions set out in the ESMS, E&S Policy and ESMP will apply to all contractors and sub-contractors . At the corporate level, ASEG will strengthen its contractor management system to make sure that contractors working on project sites meet these requirements. This entails: – Incorporating relevant ESMP conditions, including on supply chain risks assessment and management as per EBRD procurement rules and EBRD PR1 and PR2, into tender	Optimisation of the management of the environmental, social, and health & safety aspects and ensure it is reflected in work done by contractors	EBRD PR1, paragraph 26-28. EBRD PR2, paragraph 25 – 27 EBRD Procurement rules	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable.	Contractor management system.	

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	<p>documents as appropriate, contractually requiring contractors to apply these standards and provide for mitigation of non-compliance;</p> <ul style="list-style-type: none"> – Overseeing that contractors have the knowledge and skills to perform their project tasks in accordance with contract conditions; – In the case of subcontracting, requiring that contractors have similar arrangements with their subcontractors; – Audit contractors' compliance against requirements made. 						
1.6	At the corporate level, ASEG to improve its reporting on E&S performance in line with good international practice, and to meet the needs of IFIs with regards to a) corporate level E&S performance and b) specific investment project E&S performance.	Optimisation of the management of the environmental, social, and health & safety aspects.	EBRD PR1, paragraphs 29-35	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable, then on an ongoing basis.	Monitoring and reporting framework for corporate and project E&S performance approved by EBRD.	
PR2	Labour and Working Conditions						
2.1	At the corporate level, ASEG to develop and implement measures to encourage and support women in applying for (top) management positions.	Ensure diversity in management and the benefits this entails for the company and its employees.	EBRD PR2, paragraph 14	Internal resources, external consultants Responsibility: ASEG	Starting within 6 months of commencement of project activities.	Measures documented and implemented. Increase in proportion of women in management positions.	
2.2	At the corporate level, ASEG to prepare and implement a policy on gender-based violence and harassment (GBVH), inform employees and non-employee workers about the policy and	Ensure that incidents and concerns about GBVH are taken seriously and addressed.	EBRD PR2, paragraph 14, 21	Internal resources, external consultants	Within 6 months of commencement of project activities.	Policy on GBVH prepared and disseminated, aiming at	

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	encourage them to report concerns and incidents of GBVH through the staff grievance mechanism. The ASEG's Code of Conduct for employees will be revised to include zero tolerance to GBVH and other forms of harassment. It should be ensured that grievances can be submitted confidentially, if this is preferred and that the relevant staff is trained on how to address GBVH grievances.			Responsibility: ASEG		prevention of GBVH. The grievance mechanism prepared to receive and address cases of GBVH.	
2.3	At the corporate level, ASEG to review and strengthen its existing employee grievance mechanism, which should include registration of grievances but still allow for grievances to be treated confidentially, where employees prefer this. A clear description of the employee grievance mechanism is to be prepared and disseminated to all employees. This should include information on the role of the conciliation committee and its members and allow for complaints from non-employee workers (such as contractors, consultants and others engaged by ASEG).	Ensure the health and well-being of ASEG staff and optimise work performance.	EBRD PR2, paragraph 21 National Labour Law	Internal resources, external consultants Responsibility: ASEG	Within 6 months of commencement of project activities	ASEG employee grievance mechanism updated and clearly described. Evidence of awareness raising on the grievance mechanism with ASEG employees and non-employee workers.	
2.4	At the corporate level, ASEG is to offer all employees (including managers) training based on their job descriptions (i.e., continuous professional development), and networking with other water companies in Kazakhstan should be considered, e.g., in relation to good management practices of WWTPs (benchmarking against other water companies in Kazakhstan). Staff responsible for environmental and social management should be trained in environmental and social monitoring and reporting ensuring capacity for the ESAP implementation.	Ensure capacity to implement the ESAP	EBRD PR2	Internal resources, external consultants Responsibility: ASEG	Starting within 12 months of commencement of project activities	Documented evidence of training.	
2.5	ASEG shall promptly, but no later than 60 days before any decision is taken in respect of any planned redundancy, inform EBRD if such	Minimisation of job losses and compliance with Collective Agreement and EBRD's PR2.	National labour Code	Internal resources,	60 days prior any planned redundancies	Redundancies are avoided or minimised;	

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	redundancy affects at least 10% of its total employees over a 30-day period and prepare a Retrenchment Plan in line with PR2 requirements. In the case of any planned redundancy affecting at least 25% of its total employees over a 30-day period of time, ASEG will provide the Retrenchment Plan to EBRD prior to undertaking any of the planned redundancies.		Collective Agreement EBRD PR2	external consultants Responsibility: ASEG		Retrenchment Plan is in place and guided by during collective dismissals/retrenchment.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	ASEG to develop and implement a resource management and conservation plan , outlining procedures and actions to continuously identify opportunities and alternatives for resource efficiency in its operations, including related to: <ul style="list-style-type: none"> - Energy efficiency - Water use efficiency - Material use efficiency - Waste minimisation and strategies for reduction, reuse, and recycling. 	Optimisation of ASEG and its projects' environmental performance.	EBRD PR3, paragraphs 6-13	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	A completed resource management and conservation plan.	
3.2	At the corporate level, ASEG to develop an action plan for the monitoring of industrial discharges to the WW system and plan for working with main polluters to address/reduce volumes of non-compliant polluting discharges into the municipal collector, in collaboration with other relevant authorities. These shall be prioritised for improvement of wastewater quality (e.g., pre-treatment), preferably via a collaborative approach (within an awareness process), or legal action in case of recurring non-compliance.	Optimisation of WW system's environmental performance	EBRD PR3, paragraph 14	Internal resources, external consultants Responsibility: ASEG (in collaboration with relevant authorities)	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	A plan for management of industrial customers	
3.3	At the corporate level, ASEG to develop and maintain a consistent monitoring and reporting scheme for GHG emissions stemming from its operations following	Optimisation of ASEG's environmental performance.	EBRD PR3, paragraphs 20-21	Internal resources,	To be completed in appropriate time for EBRD's evaluation prior to	A consistent monitoring and reporting scheme for GHG	

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	international good practice and standards (e.g., Greenhouse gas protocol).			external consultants Responsibility: ASEG	construction and operation start as applicable.	developed and approved by EBRD.	
3.4	Within the corporate level ESMS (and as appropriate the resource management and conservation plan), ASEG is to develop and implement hazardous materials management plan outlining procedures and actions to continuously ensure oversight of hazardous materials used in the company, and their appropriate management based on risk assessment, as well as initiatives to reduce the use of hazardous materials.	Optimisation of ASEG's environmental performance.	EBRD PR3, paragraphs 22-23	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable.	A hazardous materials management plan has been developed and approved.	
3.5	ASEG to implement project level requirements as outlined in the ESMP. This includes but is not limited to specific management and monitoring plans such as: <ul style="list-style-type: none"> • A plan for closing and rehabilitating the existing sludge pond area. • A plan for reusing effluents and sludge. • An emergency plan for WWTP operations. • ESMP monitoring and operational environmental monitoring plans. ASEG must also ensure successful implementation of contractor management plans, including the CESMP through management and monitoring of contractors (see PR1).	Environmental risks and impacts associated with construction and operation of the proposed WWTP and closure of existing WWTP facilities.	National requirements EBRD PR3 Good international practice	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to pre-construction, construction and operation start as applicable and as outlined in the ESMP.	The ESMP and its respective specific sub-plans and monitoring completed as outlined in the ESMP.	
PR4	Health, Safety and Security						
4.1	At the corporate level, ASEG to strengthen its OHS management monitoring by introducing registration of near-misses . At the corporate level, ASEG to ensure that requirements related to OHS management is in	Optimisation of ASEG's worker health and safety performance.	EBRD PR4, paragraphs 11-15	Internal resources, external consultants	To be completed in appropriate time for EBRD's evaluation prior to construction and	Procedures integrated in OHS management system and contractor	

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	line with national as well as international good practice are included in tendering documents and contracts with service providers (see also point 1.5 above).			Responsibility: ASEG	operation start as applicable	management system.	
4.2	<p>ASEG to provide capacity building to its workers on OHS matters and ensure contractors are also providing capacity building on OHS to construction workers. Capacity building to be provided in line with EBRD guidance note on health, safety and security as well as briefing notes on safety related to specific works, available for ASEG and their contractors:</p> <p>How to implement EBRD performance requirements (ebrd.com)</p> <p>Safe working in confined spaces: English Russian</p> <p>Briefing note BN01: Underground and overhead services _English _Russian</p> <p>Briefing note BN02: Safe excavations _English _Russian</p> <p>Briefing note BN03: Working safely around asbestos pipes _English _Russian</p> <p>Briefing note BN04: Safe working with mobile plant _English _Russian</p> <p>Briefing note BN05: Setting up a safe site _English _Russian</p>	Optimisation of worker health and safety	EBRD PR4, paragraphs 9	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	Capacity building plan and contractor requirements	
4.3	<p>At the corporate level, ASEG is required to commission a third-party dam integrity and safety assessment of the URE retention reservoir, prior to its continued use for the new WWTP.</p> <p>The assessment should be conducted by an independent qualified firm with the necessary experiences and ensure that the dam structures of the reservoir are safe, fit and future-proof for receiving effluents from the WWTP. Necessary</p>	Assessment and management of infrastructure with potential critical community health and safety risks / impacts.	EBRD PR4, paragraphs 16-17, 19, 21	Internal resources, external consultants Responsibility: ASEG (in collaboration with relevant authorities)	To be completed in appropriate time for EBRD's evaluation prior to the construction phase	<p>A third-party dam integrity and safety assessment conducted for the URE reservoir.</p> <p>A plan for implementing necessary</p>	

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	improvements should be put in place as required, to eliminate the risk of dam failure and detrimental effects on people and infrastructure. <i>Also reflected in point 1.1. above</i>					improvements put in place.	
4.4	At the corporate level (procurement), ASEG to develop a traffic and transportation management plan for its activities. This plan can be used as a template guidance for contractors' development of project specific traffic management plans.	Optimisation of worker and community health and safety	EBRD PR4, paragraphs 30-31	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	A traffic and transportation management plan developed for ASEG activities and referenced in the contractor management system.	
4.5	Develop emergency response plan assessing potential impact from emergency situations involving third parties including local communities.	Community health and safety management	EBRD PR4 National emergency response regulation	Internal resources, external consultants Responsibility: ASEG	To be completed within the preparation of the ESMP for construction and operations phases.	Emergency response procedure targeting third parties and local communities is in place.	
PR5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
5.1	ASEG to ensure that the land acquisition be implemented in accordance with the written agreement signed on July 2, 2023, between ASEG, the Aktobe Land Management Department and the farmer, withdrawing 3.1 ha of land under the farmer's lease agreement for plot 02-036-164-435. Alternative land will be provided as stipulated in the agreement, affected assets will be compensated at full replacement cost, and all associated legal transaction cost will be covered by ASEG. Any other land acquisition, if required for the project, will be carried out through commercial transactions where possible.	Physical or economic displacement is avoided. Where impact is unavoidable, the land is acquired based on EBRD PR5.	EBRD PR5 National Land Code National Civil Code	Internal resources, external consultants Responsibility: ASEG	Prior any construction activities.	Land impact is avoided and where avoidance is not possible, the land is acquired via commercial transactions or via a process compliant with PR5.	

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	If commercial transaction is not possible, then negotiated settlements need to be perused and the Company will develop and follow a project Land Acquisition and Livelihood Restoration procedure/Plan in compliance with EBRD PR5 assessing the impact and offering compensation based on full replacement value, targeted assistance, and livelihood restoration, including recognition of informal land users and informal property owners if affected.					If needed, Land Acquisition and Livelihood Restoration procedure/Plan is developed and implemented in line with PR5.	
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Implement project level requirements as outlined in the ESMP. Carry out regular monitoring on site and status of the recipient River Ilek during construction and operation.	Avoid negative impacts on flora and fauna and enhance habitats through rehabilitation of the existing sludge pond area, and hydrobiological conditions in the Ilek river	EBRD PR6 National legislation	Internal resources, external consultants Responsibility: ASEG	Prior any construction activities, during construction and operation phases	ESMP requirements are included in construction contracts and implemented. Regular monitoring conducted and corrective actions developed as required.	
PR7	Indigenous People						
	No actions required.						
PR8	Cultural Heritage						
8.1	Develop a Chance Finds Procedure covering, at a minimum: the legal framework for cultural heritage; the process to follow in the event of chance finds; roles and responsibilities for implementing the procedure and an induction for all workers, including project staff, contractors and government agencies.	Any new construction activities involving ground-breaking works are implemented with CH mitigation measures in place.	EBRD PR8	Internal resources, external consultants Responsibility: ASEG	Prior any construction activities including prior site preparation.	Chance Finds Procedure is developed and applied on the project.	

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PR10	Information Disclosure and Stakeholder Engagement						
10.1	At corporate level, ASEG to appoint an experienced Head of its Public Relations Unit. Implement project SEP and do/keep regular SEP updates including external communication with relevant stakeholders.	Enabling ASEG to continue its communication activities, public consultations, and handling of grievances.	EBRD PR10, paragraph 9	Internal resources Responsibility: ASEG	Prior to start of the project.	Experienced Head of ASEG's Public Relations Unit appointed and started work. Progress on SEP implementation.	
10.2	At corporate level, ASEG to improve its registration of grievances, enabling the company to gain an overview of the total number of grievances received and the main areas/topics of these. The closure of grievances should also be registered, i.e., after solutions have been found and the complainant has been informed.	Putting ASEG in a better position to improve its services based on the main areas/topics of grievances received and to ensure that grievances are handled in a structured way.	EBRD PR10, paragraph 29	Internal resources, external consultants Responsibility: ASEG	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	Number and type of grievances reported to EBRD. Process for receiving and handling of grievances documented.	