



European Bank
for Reconstruction and Development

Environmental and Social Action Plan for Modernisation of CHP 2

Modernisation of Almaty CHP 2,
Kazakhstan

June 2022

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Modernisation of Almaty CHP 2, Kazakhstan

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Acronyms and Abbreviations

Name	Description
AO	Joint-Stock Company
CHP	Combined Heat Plant
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment (in line with national requirements)
ERP	Emergency Response Plan (
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
GHG	Greenhouse gas
GIIP	Good International Industry Practice
HIF	Hazardous Industrial Facility
HR	Human Resources
ISD	Industrial Safety Declaration
HSE	Health Safety and Environment
PR	Performance Requirements
SEP	Stakeholder Engagement Plan

1. THIS DOCUMENT

The European Bank for Reconstruction and Development (“EBRD” or the “Bank”) and Samruk Energy of Kazakhstan are considering the modernization and reconstruction of CHP-2 of Almaty (the “Project”), one of the three CHPs that provide heat to the district heating network of the city operated by Almaty Electric Stations JSC (“JSC AIES” or the “Company”). The main purpose of the Project is the full replacement of coal by natural gas as the primary fuel.

Under this framework, the EBRD hired ERM (the “Consultant” or “ERM”) to carry out a detailed project preparation study for the Project at a level sufficient for the Bank to decide for its possible financing and ensure the Project is structured to comply with the Bank’s Performance Requirements (PRs).

ESAP has been developed to provide the Project with a tool to collect, arrange and track commitments under the EBRD Performance Requirements, Environmental, Health, and Safety General Guidelines focusing on additional mitigation measures that should be performed during bankable ESIA and ESMS.

2. ENVIRONMENTAL AND SOCIAL ACTION PLAN

Environmental and Social Action Plan is set out below in a table format (Table 1). Actions were grouped according to the relevant topics. The following parameters are specified in the table for each of the proposed actions:

- Project commitments according to the Project Standards, or benefits (e.g. impact mitigation and management), determining the need for action;
- Corresponding Project Standards;
- Resources and responsible parties;
- Action timeframe;
- Performance criteria (e.g. reporting documents, published information, etc.);
- Performance status of the action by the time of writing:
 - not initiated, due later (an action is scheduled, but the start date or condition has not yet occurred);
 - in progress, pending (an action is being implemented);
 - performed (closed);
 - not performed, overdue (an action is not performed when due);
 - excluded (an action has been excluded from the ESAP).

Table 1: Environmental and Social Action Plan

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
1	PR 1. Assessment and Management of Environmental and Social Impacts and Issues							
1.1.	<p>Perform an environmental and social impact assessment in accordance with EBRD PRs:</p> <ul style="list-style-type: none"> ■ Impacts of the associated facilities; ■ cumulative impacts; ■ social and gender aspects; ■ risks to the Project caused by climate change; ■ environmental and social risk assessment for construction of the associated facility ; ■ environmental and social risks associated with the Project implementation for the Operation Phase; ■ mitigation hierarchy. <p>The ESIA shall be undertaken in line with ESIA in line with EBRD and ADB requirements that will include a further air quality monitoring. This will be done prior to start of construction include public consultation on the solutions taken and include decommissioning details for the coal fired plant.</p>	EBRD PR 1 EHS General Guidelines; EHS Guidelines for Thermal Power Plants	Samruk Energy JSC "AIES" EPC Contractor Independent consultant	Prior commencement of construction activities on the Project site	ESIA package disclosed to stakeholders and approved by Lenders and/or Independent Lender's Consultant	Not initiated	Moderate	Category A Project
1.2.	Adjust the following policies, standards of the Company in line with EBRD PR's:	EBRD PR 1 EHS General Guidelines;	Samruk Energy JSC "AIES"	Prior commencement of construction	Project policies are in compliance with EBRD requirements as confirmed by	Pending	Minor	Early stage of the Project development

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	<ul style="list-style-type: none"> ■ Environmental and Social Policy to establish a separate Policy for the Project in line with EBRD PR's requirements; ■ Risk Management Policy to address the impact of third-parties' potential material and social losses related to the operation of the Company's industrial facilities on the Parent Company's risks; ■ Adjust IMS Policy safety provisions to personnel as part of induction/primary briefings and behavioral audits; ■ Adjust the Policy on contractors management by introducing EBRD requirements to be observed by the Project contractors.. 	EHS Guidelines for Thermal Power Plants		activities on the Project site	Independent Lender's consultant			
1.3.	Adjust follow plans in line with EBRD PR's: <ul style="list-style-type: none"> ■ Emergency Response Plan (ERP) for the Project Operation Phase with consideration of the Risk Assessment finding. 	EBRD PR 1 EHS General Guidelines; EHS Guidelines for Thermal Power Plants	Samruk Energy JSC "AIES"	Prior commencement of operating phase of the Project	Emergency Response Plan is developed for the Project Operation stage as confirmed by Independent Lender's Consultant	Pending	Minor	Early stage of the Project development
1.4.	Develop management plans following the results of the ESIA, including but not limited to: <ul style="list-style-type: none"> ■ Environmental and Social Management Plan; ■ H&S Management Plan for the Construction Phase; ■ Transport Risk Management Plan; 	EHS General Guidelines; EHS Guidelines for Thermal Power Plants	Samruk Energy JSC "AIES" Independent consultant	As a part of the ESIA package	Environmental and Social Management Plans are developed reflecting results of the ESIA and embedded in the Company's IMS, as confirmed by Independent Lender's Consultant	Not initiated	Moderate	Category A Project

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	<ul style="list-style-type: none"> ■ Third-party Risk Management Plan for major accidents during construction; ■ Stakeholder Engagement Plan. 							
1.5.	<p>Develop the following procedures:</p> <ul style="list-style-type: none"> ■ Internal procedure for determining social risks associated with potential accidents for the processes that are not subject to ISD under the national legislation; ■ Risk Management Procedure for the spread of infectious diseases, including COVID-19; ■ Monitoring and reporting procedure for the management of accident-related environmental and social risks during operation; ■ Unified standard for the management of hazardous substances. 	EBRD PR 1 EHS General Guidelines; EHS Guidelines for Thermal Power Plants	Samruk Energy JSC "AIES" Independent consultant	As a part of the ESIA package	Relevant procedures are developed reflecting results of the ESIA and embedded in the Company's IMS, as confirmed by Independent Lender's Consultant	Not initiated	Minor	Category A Project
1.6.	<p>Establish specific ESMS for the Project:</p> <ul style="list-style-type: none"> ■ Conduct the training of the Project's HSE staff in the EBRD PRs requirements; ■ Establish an H&S function as part of the unified H&S Management Plan. 	EBRD PR 1 EHS General Guidelines; EHS Guidelines for Thermal Power Plants	JSC "AIES"	As a part of the ESIA package	Project specific ESMS is developed reflecting results of the ESIA and embedded in the Company's IMS, as confirmed by Independent Lender's Consultant	Not initiated	Moderate	Category A Project
1.7.	Ensure construction contractor (General or EPC) develop the H&S Management Plan for the Construction Phase.	EHS General Guidelines; EHS Guidelines for Thermal Power Plants	JSC "AIES" General Contractor	Prior commencement of construction activities on the Project site	H&S Management Plan for the Construction Phase is developed and applied by Construction Contractor, as confirmed	Not initiated	Moderate	Category A Project

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
					by Independent Lender's Consultant			
1.8.	Develop a corporate ESG reporting and disclosure mechanism in line with best industry practices such as ISSB and EU CSRD and TCFD. This will include reporting at the plant lever and the Samruk Group level of climate relates information such as scope 1, 2 and 3 emissions. The reporting will use the CSRD and GRI as benchmark.	EBRD	Internal and external consultants for the Almaty CHP and the Samruk Group	From 2024	ESG Report for Almaty CHP and ESG report for Samruk Group	Not initiated	Minor	Corporate responsibility standards
1.9.	Once the new plant is constructed decommission the coal fires plant.	EBRD	Internal and contractors	From 2026	Full decommissioning of half of coal boilers at time of commission and further decommission of remaining 6 cold storage boilers during 2026-2030. Report in ESG reports	Not initiated	Moderate	Category A Project
2.	PR 2. Labour and Working Conditions							
2.1.	Develop and implement a HR management system including a HR Policy Statement and associated procedures / plans. HR Policy Statement and procedures should cover as a minimum: i) Non discrimination, equal rights, equal pay;	PR2 and national labour laws International Labor Organization (ILO) requirements	JSC "AIES"	Prior to the financial close	HR Policy Statement and associated procedures submitted and accepted by EBRD Labour focused management plans and codes of conduct submitted and cleared by EBRD.	Pending	Minor	Category A Project

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	ii) Prohibition of all forms of child labour and forced labour; (iii) Workers' rights and obligations (including worker code of conduct); (iv) Freedom of association and right to collective bargaining; (v) Informing workers about their rights, obligations, liabilities, and entitlements; (vi) Terms of employment including recruitment, hours of work, overtime arrangements and overtime compensation, rights to refuse overtime requests; (vii) Contractor management; (viii) Workers accommodation: processes and standards – guidance notes by IFC and EBRD 2009; (ix) Occupational health and safety; (x) Commitment to apply zero tolerance for any proven case of gender based violence, workplace harassment and sexual exploitation and abuse; (xi) Whistleblower protection; (xii) Worker grievance mechanism Company will ensure that the HR Policy, and associated plans and procedures adopted by their EPC contractor and apply to all project				Contractual provisions added to agreements with the contractor and sub-contractors to ensure alignment of HR policies and procedures with PR2 Implementation verified by external audits during project supervision.			

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	workers, including (sub)contractors' workers and those employed through agencies.							
2.2.	Develop and implement a Workers Grievance Mechanism (WGM) compliant with the PR2 and covering all contractor and subcontractor workers.	PR2 and national labour laws International Labor Organization (ILO) requirements	JSC "AIES"	Prior to the financial close	Workers Grievance Mechanism submitted and accepted to EBRD. Master grievance register log submitted to Lenders Implementation verified by external audits during project supervision.	Pending	Moderate	Category A Project
2.3.	Should there be a mass dismissal, the company should develop and implement a Retrenchment Plan as per requirements of the national labour laws and PR2. Retrenchment Plan should be disclosed and consulted with all workers, union, and other stakeholders prior to its finalization.	EBRD PR 2 and Guidance Notes on Collective Dismissal National labor legislation	JSC "AIES" Independent consultant	1 month prior to start of the actual dismissals	Retrenchment Plan submitted and accepted by EBRD	Not initiated	Moderate	Potential impact of CHP-2 workers
3.	PR 3. Resource Efficiency and Pollution Prevention and Control							
3.1.	Perform a GIP (BAT) analysis and identify opportunities and alternatives for resource efficiency relating to the Project in accordance with GIP; Confirm that Project solutions are in line with GIP (BAT), including: <ul style="list-style-type: none"> ■ The new plant will include a CEMS (continued emission monitoring systems on all stacks) 	EBRD PR 3 EHS Guidelines for Thermal Power Plants	JSC "AIES" Independent consultant	As a part of the ESIA package	Compliance with BAT/GIIP is embedded in the Project design as confirmed by Independent Lender's Consultant	Not initiated	Minor	Category A Project

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	<p>and deNOx to ensure emission of:</p> <ul style="list-style-type: none"> ○ NOx -- below 50 mg/NM3 (10-30 mg/Nm3 yearly average); ○ CO – 5-30 mg/Nm3 (yearly average); <ul style="list-style-type: none"> ■ Net electrical efficiency of the units will be 57-60.5%; ■ Modernised plant will apply water recycling; <p>BAT report to be published as part of ESIA done by EPC contractors to confirm that the EPC solution meets EU BAT.</p>							
3.2.	<p>Quantify GHG emissions in accordance with EBRD Protocol for Assessment of Greenhouse Gas Emissions for both construction and operation stages. Consider alternatives to avoid or minimise project-related GHG emissions.</p> <p>Ensure provision of measures to minimize carbon footprint of the Project.</p>	EBRD PR 3 EHS Guidelines for Thermal Power Plants	JSC "AIES" Independent consultant	As part of the ESIA package	Calculations of Scope 1 and 2 of GHG emissions; Plan for minimization of GHG emissions for construction and operation stages confirmed by Independent Lender's Consultant	Not initiated	Minor	GHG Emissions of the Project will likely exceed 100,000 tons annually
3.3.	<p>Consider potential cumulative impacts of water abstraction upon third party users and local ecosystems, including the potential effects of climate change.</p>	EBRD PR 3 EHS General Guidelines ; Health and Safety Guidelines for Thermal Power Plants	JSC "AIES" Independent consultant	As a part of the ESIA package	Cumulative impacts are assessed within the ESIA as confirmed by Independent Lender's Consultant	Not initiated	Minor	Category A Project

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
3.4.	Obtain chain of custody documentation to the final destination of waste and use contractors that are licensed by the relevant regulatory agencies.	EBRD PR3 EHS General Guidelines ;	JSC "AIES"	Ongoing operations, during construction and operation stage of the Project	Waste management documentation is available as confirmed by Independent Lender's Consultant	Not initiated	Minor	Gap btw national requirements and EBRD requirements
3.5.	Identify risks and impacts associated with waste management and apply the mitigation hierarchy to waste management.	EBRD PR3 EHS General Guidelines ;	JSC "AIES"	As a part of the Project's ESMS		Not initiated	Minor	
3.6.	Estimate potential toxic impact zones in the new ISD for operation stage of the Project.	GIIP EHS Guidelines for Thermal Power Plants	JSC "AIES"	ISD is updated prior commencement of Project operation	Standard for the management of hazardous substances is developed and embedded in Project's operations as confirmed by Independent Lender's Consultant	Not initiated	Minor	Potential Hazards of Operation
3.7.	Provide CHP-2 with gas rescuers, either own or contracted.	EBRD PR 3 National Safety Regulations EHS General Guidelines	JSC "AIES" Contractor(s)	As a part of the Project specific ESMS	Relevant contracts or Company's Department is operating and managed in line with GIIP	Not initiated	Negligible	Potential Hazards of Operation
4.	PR 4. Community Health and Safety							
4.1.	Include a procedure for engagement with third parties in the risk zone associated with potential accidents at CHP-2 and an associated facility) in Emergency Response Plan for the Project Operation Phase.	EBRD PR 4 EHS General Guidelines	JSC "AIES" Independent consultant	As part of the Project specific ESMS	Updated Emergency Response Plan as confirmed by Independent Lenders Consultant	Not initiated	Minor	Potential Hazards of Operation

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
4.2.	Include disclosure process to third parties about potential risks and actions in case of accidents that may affect these third parties in Third-party Risk Management Plan.	EBRD PR 4 EHS General Guidelines	JSC "AIES" Independent consultant	As part of the Project specific ESMS	Updated Third-party Risk Management Plan is developed and implemented as confirmed by Independent Lender's Consultant	Not initiated	Minor	Potential Hazards of Operation
4.3.	Evaluate all social and environmental risks associated with hazardous substances and determine measures to minimize them.	EBRD PR 4 EHS General Guidelines	JSC "AIES" Independent consultant	As part of the Project specific ESMS	Standard for the management of hazardous substances is developed and embedded in Project operations as confirmed by Lender's Independent Consultant	Not initiated	Minor	Potential Hazards of Operation
4.4.	Assess impact zones for accidents associated with a release of hydrazine hydrate; assess the adequacy of existing risk minimization controls.	EBRD PR4 EHS General Guidelines	JSC "AIES" Independent consultant	As part of the Project specific ESMS	Standard for the management of hazardous substances	Not initiated	Minor	Potential Hazards of Operation
4.5.	Obtain an official response that identification of toxic substances is not necessary, or otherwise identify CHP-2 as a HIF based on the presence of toxic substances.	EHS General Guidelines	JSC "AIES" Independent consultant	Since the approval of the Plan	Standard for the management of hazardous substances	Not initiated	Minor	Potential Hazards of Operation
4.6.	Assess potential risks associated with the delivery/transportation of fuels and lubricants, equipment, and materials for the Project.	EBRD PR4 EHS General Guidelines	JSC "AIES" Independent consultant	As a part of ESIA package	Transport Risk Management Plan is developed in line with ESIA outcomes as	Not initiated	Minor	Category A Project

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#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
					confirmed by Lender's Independent Consultant			
4.7.	Conduct a quantitative risk assessment for natural disasters which may affect Project's impacts and performance.	EBRD PR4 EHS General Guidelines	JSC "AIES" Independent consultant	As a part of ESIA package	Emergency Response Plan is developed as confirmed by Lender's Independent Consultants	Not initiated	Minor	None
4.8.	Undertake assessment of potential CHP accident scenarios. Assess the response resources requirements.							
4.9.	<p>Develop project of <i>preliminary (calculated) SPZ</i> based on the:</p> <ul style="list-style-type: none"> ■ calculations of the ambient air pollution (taking into account baseline concentrations), ■ calculations of physical impacts (noise, vibration, electromagnetic radiation and other physical factors), ■ health risk assessment. <p>The SPZ project shall include:</p> <ol style="list-style-type: none"> 1) general information about Project corresponding to the intended purpose of land plots; 2) analysis of the functional use of the territory in the Project area; 3) a brief environmental baseline; 	EBRD PR4 National legislation ¹	JSC "AIES" Specialized organization ²	As a part of the process of national EIA prior the construction stage ³	Within the EIA report calculation of preliminary SPZ size is presented based on the modelling results	Pending	Major	Category A Project

¹ Sanitary Rules "Sanitary and epidemiological requirements for sanitary protection zones of objects that are sources of impact on the environment and human health", approved by the Order of the Acting Minister of Health of the Republic of Kazakhstan dated January 11, 2022 No. KR DSM-2 (*hereinafter Sanitary Rules on SPZ*), Chapter 2, Paragraph 4, 8 and 9, and Annex 9

² Sanitary Rules on SPZ, Chapter 2, Paragraph 10, 25 and 29

³ Sanitary Rules on SPZ, Chapter 2, Paragraph 44

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	4) calculation of the SPZ by the factor of ambient air pollution; 5) calculation of the SPZ by the noise impact factor; 6) calculation of SPZ for other negative impact factors; 7) analysis of water consumption and sanitation; 8) production waste generation; 9) mitigation measures 10) justification of the boundaries of the SPZ according to the summary of indicators; 11) the boundaries of the SPZ in a map with a textual description of the tracing of the SPZ boundary; 12) measures and means for planning organization, landscaping and planting of the SPZ territory; 13) conditions of use of the SPZ territory; 14) health risk assessment; 15) tabular and graphic (map) materials.							
4.10.	Approve the SPZ: the size of the sanitary protection zone should not exceed the calculations submitted as part of the national EIA, which has passed the procedure of public	EBRD PR4 National legislation ⁴	JSC "AIES" Specialized organization ⁵	Within the timeframe allowed by the national legislation	SPZ project approved by the Almaty Chief State Sanitary Doctor ²	Pending	High	Category A Project

⁴ Sanitary Rules "Sanitary and epidemiological requirements for sanitary protection zones of objects that are sources of impact on the environment and human health", approved by the Order of the Acting Minister of Health of the Republic of Kazakhstan dated January 11, 2022 No. KR DSM-2 (*hereinafter Sanitary Rules on SPZ*), Chapter 2, Paragraph 4, 8 and 9, and Annex 9

⁵ Sanitary Rules on SPZ, Chapter 2, Paragraph 10, 25 and 29

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	hearings and approved by the state expertise							
4.11.	Conduct a one-year cycle of field studies and measurements to confirm the calculated parameters of preliminary SPZ: <ul style="list-style-type: none"> ■ Ambient air pollution, ■ Level of physical impacts: <ul style="list-style-type: none"> ○ noise, ○ vibration, ○ electromagnetic radiation, ○ infrasound, ○ scattered laser radiation, ○ other physical factors. ■ and (or) biological impacts. 	EBRD PR4 National legislation ⁶	JSC "AIES" Specialized organization ²	During the 1 st year of operation ⁶	Results of the one-year cycle of field studies and measurements for each component	Not initiated	Major	Category A Project
4.12.	Develop <i>established (final) SPZ</i> based on: <ul style="list-style-type: none"> ■ project of preliminary (calculated) SPZ, ■ results of a one-year cycle of field studies and measurements. 	EBRD PR4 National legislation ⁶	JSC "AIES" Specialized organization ²	No later than one year from the commissioning date ⁶	SPZ project approved by the Almaty Chief State Sanitary Doctor ²	Not initiated	Major	Category A Project
5.	PR 5. Land Acquisition, Involuntary Resettlement and Economic Displacement							
5.1.	Prepare and implement a Resettlement Plan (RP) to address land acquisition and resettlement impacts caused due to the establishment and enforcement of Sanitary Protection Zone for the company. RP should be developed in	EBRD PR5 National legislation on land acquisition	JSC "AIES" Independent consultant	RP prepared and implemented prior to occurrence of impacts on affected people	RP prepared and accepted by EBRD	Not initiated	Moderate	Category A Project Significant number of affected households

⁶ Sanitary Rules on SPZ, Chapter 2, Paragraph 9, 32 and 42

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
	line with the Resettlement Framework and RP5, consulted with all affected households, and disclosed publicly in English, Russian and Kazak languages.							
5.2.	RP implementation will be verified through preparation and submission of RP completion report. The completion report should be prepared by the external consultant and confirm that RP was implemented as per terms agreed in RP and PR5 requirements.	EBRD PR 5	JSC "AIES" Independent consultant	Upon completion of RP implementation	Completion report accepted by EBRD	Not initiated	Moderate	Category A Project Significant number of affected households
6.	PR 6. Biodiversity Conservation and Sustainable Management of Living Natural Resources							
6.1.	During the ESIA Scoping provide identification of risks and impacts on biodiversity related to associated facilities and transportation of large equipment and activities of Project's primary suppliers.	EBRD PR6	JSC "AIES" Independent consultant	As a part of ESIA the ESIA Scoping	ESIA Scoping report includes relevant section. Further actions are undertaken as appropriate which confirmed by Independent Lender's Consultant	Not initiated	Negligible	Category A Project
7.	PR 7. Indigenous People	Not applicable. No actions required						
8.	PR 8. Cultural Heritage							
8.1.	Develop a standardised Chance Finds Procedure template to be rolled out for associated projects.	EBRD PR8	JSC "AIES" Independent consultant	Within the ESIA process	Chance Finds Procedure template Grievance Mechanism	Not initiated	Minor	Category A Project
9.	PR 9. Financial Intermediaries	Not applicable. No actions required						

#	Action	Applicable requirements	Resources and Responsible parties	Timeframe	Performance criteria	Performance status	Impact significance	Rank-up reason
10.	PR 10. Information Disclosure and Stakeholder Engagement							
10.1.	Implement SEP, and update SEP on bi-annual basis, throughout the project cycle.	EBRD PR10	Samruk Energy JSC "AIES" Independent consultant	Through the project cycle	SEP implementation confirmed via updating and disclosing stakeholder engagement log on quarterly basis.	SEP developed	Moderate	Category A Project Importance of the Project for Almaty citizens Focus of NGOs on the Project progress
10.2.	Engage Community Liaison Officer (CLO), who will be responsible for the SEP implementation and overall engagement with stakeholders.	EBRD PR10	JSC "AIES"	Prior to financial close	CLO is hired	Not initiated	Moderate	
10.3.	Update SEP based on the outcomes of the ESIA study. Provide for regular monitoring of the SEP implementation and update based on the results of the monitoring.	EBRD PR10	Samruk Energy JSC "AIES" Independent consultant	Prior to financial closure	Updated SEP is adopted by the Company, embedded in the Project specific ESMS and approved by the Independent Lender's Consultant.	Not initiated	Moderate	
10.4.	Adopt the updated grievance mechanism with clear procedure of addressing complaints. This mechanism shall provide an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution.	EBRD PR10	JSC "AIES"	Within the ESIA process prior to financial closure	GRM is adopted by the Company, embedded in routine operations and approved by the Independent Lender's Consultant.	Procedure is included in the SEP developed as a part of the Gap Analysis study	Moderate	Category A Project Significant number of affected stakeholders Focus of NGOs on the Project progress

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