



ASIAN INFRASTRUCTURE
INVESTMENT BANK

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ZHANATAS WIND POWER PLANT STAKEHOLDER ENGAGEMENT PLAN



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ABBREVIATIONS

AIIB	Asian Infrastructure Investment Bank
CLO	Community Liaison Officer
CSR	Corporate Social Responsibility Program
EIA	Environmental Impact Assessment
EHS	Environmental Health and Safety
ESS	Environmental and Social Standards
IFC	International Finance Corporation
NGO	Non-Governmental Organization
NTS	Non-Technical Summary
SEP	Stakeholder Engagement Plan
PS	Performance Standard
WPP	Wind Power Plant

1 INTRODUCTION

This Stakeholder Engagement Plan (SEP) describes China Power International Development Limited Co., Ltd (the Company) approach to interacting with stakeholders, including the general public, and the disclosure of relevant information with respect to the Company's current operations and its 100MW wind power plant (WPP), located near Zhanatas town in Sarysu District, Zhambyl Region (the Project).

The Stakeholder Engagement Plan includes a strategy to provide timely, meaningful and appropriate information to stakeholders and to ensure the opportunity for such stakeholders to express their views and comments. The SEP provides a mechanism for the consideration and response to comments and potential grievances raised by stakeholders. Engagement with stakeholders is an ongoing process, which applies to the entire period of the project planning, construction and operation.

The Project aims to provide a sustainable and environmentally friendly source of renewable electrical energy for the region and allow Kazakhstan to meet its commitment to producing 3% of total energy from renewable sources. For the time of the construction and decommissioning, the local contractors will gain specific knowledge, employment and entrepreneurial opportunities will be generated for the locals. Yet, women may not be given sufficient opportunity to participate in the project. In the long term, 4 benefits are expected: 1) increase revenue for the local and national budget; 2) overall power supply reliability improvement; 3) some local jobs and 4) early example of renewable energy source profitability that may encourage other developers to invest in similar projects elsewhere and by this generate jobs. Few local non-skilled workers will be employed (preliminary a secretary and a cleaner) but some local school graduates may be encouraged to obtain education that will allow them to apply for the more qualified jobs of the electricians and operators.

2 LEGAL FRAMEWORK

The activities specified in this plan conform to Kazakhstan legislation including ratified by Kazakhstan international conventions and 'Information Disclosure', Consultation' in AIIB ESS 1. The project will be designed to meet the best international practices. Table 1 summarises the Kazakhstan and AIIB.

Table 1 Stakeholder consultation requirements summary

AIIB ESS	Kazakhstan Requirements
<p>Ensure that relevant information about environmental and social risks and impacts of the Project is made available in the Project area in a timely and accessible manner and in a form and language(s) understandable to the Project-affected people, other stakeholders and the general public, so they can provide meaningful inputs into the design and implementation of the Project.</p> <p>Engage in meaningful consultation with stakeholders during the Project's preparation and implementation phases, in a manner commensurate with the risks to, and impacts on, those affected by the Project.</p> <p>Continue consultation with stakeholders throughout Project implementation as necessary on issues related to environmental and social performance and implementation of the Project-level grievance mechanism.</p> <p>Establish and design the mechanism to address Project-affected people's concerns and complaints promptly, using an understandable and transparent process that is gender-sensitive, culturally appropriate and readily accessible to all Project-affected people.</p> <p>For Private sector projects, establish the grievance mechanism for workers to address workplace concerns.</p> <p>Where relevant, use gender disaggregated data and analysis, and consider enhancing the design of the Project to promote equality of opportunity and women's socioeconomic empowerment, particularly with respect to access to finance, services and employment.</p> <p>Disclose monitoring reports in accordance with Information Disclosure.</p>	<p>Stakeholder identification is not required. Relevant regulatory bodies to be identified.</p> <p>Public consultation not required if project is not in the list or activities that require EIA and is judged by EIA developer not to have direct impacts. If district council requests consultation before the land allocation, decided to conduct, public notices shall be published in two local newspapers in Kazakh and Russian languages and project information disclosed 20 days before the meeting that ends the consultation. Local council shall be consulted on the time and place of a public meeting and invited to it. Results are submitted with the EIA to the State Environmental Expertise for approval.</p> <p>Grievance mechanism shall comply with the Law on Grievances Handling procedures № 221-III 12.01.2007</p>

3 STAKEHOLDERS ENGAGEMENT AND INFORMATION DISCLOSURE TO DATE

Before this assessment there has been a public hearing. The public note was posted on 15.01.2019 on the regional council website and public notes website market.kz until 15.02.2019 when a public meeting was arranged at the Zhanatas community hall. Farmers, officials, the public governance councilor, project manager and project designer were present at the meeting. The questions from public governance councilor were about archaeological surveys, local people employment, impact of the WPP on environment and pastures. No other comments or grievances were expressed at the meeting and over the consultation period.

The second consultation was held by consultant in March 5-6, 2019. Consultant interviewed district council representatives such as deputy councilor, land relations department director, senior specialist, businesses department director to know the socio-economic conditions of Zhanatas town, its history and development perspectives. Additionally, consultant interviewed residents of Zhanatas, Burkitbayev, Ushbas, Aktogay and Syzdykbayuly villages and Zharasbek farm owner to identify the visual impact of turbines on their wellbeing. The panoramas taken from their places of visual value (e.g. house and yurt entry bench, vegetable patch) with the juxtaposed turbines were sent to their smartphones and their opinion of the impact was asked. As none of them expressed any concern about the view, the Consultant asked the interviewees to inform him if the actual view will differ from the predicted significantly. The nearest farm owner expressed only concern about the construction works that may obstruct the grazing paths and scare the livestock with blasting. Most of the locals from Zhanatas town, Burkitbayev and Ushbas villages knew about the Project from others.

Seven farmers, whose land plots are crossed by the windfarm, were invited to the district council and informed about the windfarm construction plans. The land requirements were explained using the Land Use Map with the Project land requirements juxtaposed onto the farmers land. After acquainting themselves with the map and realizing that on average less than 1% of the land was to be taken, the farmers signed the map that served as the agreement to hand over the land needed for the Project. Going beyond the legislative requirements, the council wanted to sign the meeting minutes but could not locate the farmers. One tenant exited the lease agreement after the death of owner in 2018. Interviews with 6 farmers showed that two of them remembered signing some land acquisition agreement and heard about the windfarm construction plans. The lease contracts were not rearranged. After the turbines number reduction from 51 to 40, the released land was not returned to these tenants, one tenant's land was not crossed by the windfarm. To avoid the compensation payment, another agreement for small land transfer to State Reserve was obtained by the land relations department with five farmers whose land was crossed according to the 40 turbines design. None of the six farmers were compensated for the acquired for the project land with land or cash.

4 STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

To ensure continuous and systematic communication with stakeholders of the project, the Company has appointed a Community Liaison Officer (CLO): Mr. Naurizbek Zhumagazin Tel.: +7 747 271 14 69 E-mail: nk.zhumagazin@gmail.com. Address: Kazakhstan, Zhambyl Region, Sarysu district, Zhanatas Town, Microdistrict #1, Building 18/4, Office 11 or the Almaty Headquarters: Business Center Evolution, 8th floor, Office #70, Bukhar Zhyrau Boulevard, 26/1.

The CLO will provide information, collect feedback, as well as provide answers to incoming communications (via email, telephone or in person). The CLO will regularly update this SEP, including Table 2 with particular attention to identification of vulnerable stakeholders.

Company will publish the project information and results of the stakeholders consultation on its website www.cpihzhanatas.kz, which will act as the primary source for the public and NGOs at regional, national and international level.

4.1 Local Authorities and Regulators

The CLO will establish communication with the district and town councils. The town councilor is expected to play key role in identifying local needs and project related problems and apprehensions. He shall receive the project related information in paper copy or over email, as appropriate. The CLO will maintain regular telephone contact with the Zhanatas rural area councilors and during construction period conduct several meetings in relation to the development and implementation of the Corporate Social Responsibility Program (CSR). The councilors are expected to be a driving force in organizing the local community if this is required to implement the CSR. They will report to the district councilor as required.

To comply with the legislation, the District Job Centre will be informed about employment plans.

Communication with the other regulators will be formal and within the framework required by the legislation but intermittent phone calls and meetings will be made by CLO for clarification of arising issues.

4.2 The Project Workers

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

4.3 Suppliers of Goods and Services

The Company will ensure fair selection and allow potential suppliers to have sufficient time for building qualitative and quantitative capacity for the required services. The Company will incorporate health & safety, environmental and social requirements in the contracts, including reporting requirements and provisions for performance monitoring and regular audit of the suppliers work sites, practices and documentation in order to ensure adherence to the contractual obligations. The Company will provide early information on changes in demand to enable timely adjustment without jeopardising the contractor business and personnel security. The supplier personnel involved in the project will be included in the information disclosure process and grievance mechanism. Sufficient training will be conducted to ensure fair understanding and sufficient capacity to implement the EHS and Social management and mitigation measures.

4.4 Local Population

The local population is represented by the Public Governance Council and organised by the district councillor. The Zhanatas residents are expected to be interested in the project related job opportunities. The CLO will ensure that local residents are given updated information on the project, the grievance mechanism and job opportunities.

The local population will be interested in jobs and qualification improvement opportunities in the nearest future and in a longer perspective. The CLO will disclose the list of professions that will be required by the project at each phase, regular information on the work progress and the grievance mechanism.

The project information will be disclosed through the local mass media, at the council's information board and Community Service Centre. The media will also be fed with the project updates regularly and will be expected to disclose it.

Table 2 Project stakeholders and information disclosure methods

Stakeholder	What to Disclose	How and Where	When
Zhanatas town and rural area and councils	EIA, NTS, SEP, bulletins employment plans, CSR discussion results	Telephone, email, formal letters hand delivery if required and meetings at the council office	As soon as possible
District and regional regulatory bodies	EIA, vacancies, formal reports on accidents, air pollution etc.	Formal submissions through Zhanatas Community Service Centre, Job Centre	As required by legislation
Suppliers of goods and services	Early warning on required services and significant changes in demand. EHS project requirements	Company website and email after subscribing on the website	As soon as possible
Job seekers	Vacancies and list of professions that would be required at the plant during construction and operation	Project information boards at Community Service Centre, at councils, notes to local newspapers, formal reports to district job centre, website	
Project workers	Employment conditions and labour rights, grievance mechanism with changes	Information board at WPP onsite office	Before construction starts then continuously
Zhanatas residents	NTS, SEP, EIA, bulletins, vacancies, CSR	Project information board at Community Service Centre, the council, notes to local newspaper, website	
Vulnerable groups (if identified)	NTS, SEP, bulletins Specific impact and work schedule	Regular visits depending on impact character, phone calls, mails with delivery notice, text messaging of any changes	
Local media	NTS, SEP, detailed project information on request	Website, emails to points of contact, press-releases	At start of construction and on commissioning
Local and international NGOs	NTS, SEP, project schedule, extracts from annual report	Website notes and mailing if registered	As per AIB/IFC disclosure requirements

4.5 Local Media

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

4.6 Non-Governmental Organizations

The CLO will establish email contact with representatives of the regional environmental and social NGOs Koktem Service on job security support, Bolashak on vulnerable groups support, Eco Tabigat on environmental protection to provide them with initial information on the project. The missed NGOs are expected to apply to the CLO through the grievance mechanism.

International NGOs with an interest in the project will obtain information in English on the project website.

5 VULNERABLE GROUPS ¹

No vulnerable groups have been identified during assessment. Six land tenants opportunistically rented as much land as they could after disintegration of the collective farm because the rent was very low. The size and shape was decided by the district council but none of the farms pay any attention to the land plots boundaries when pasturing the livestock. The land will remain available for pasturing and the damaged vegetation will be away from the main grazing grounds spread along 17 galleys.

The nearest farm owner Peishbek was only concerned about the construction works obstructing the livestock paths and blasting scaring the livestock. He was explained that there will be no trenching and low energy blasting inside the foundation pits will not be heard far from the source.

The CLO will monitor changes in Zhanatas community for vulnerability aspects and appearance of such groups. If a vulnerable group is identified, it will be evaluated and monitored and the most appropriate ways of engaging it in the decision making process will be developed. If impact on the identified vulnerable group could not be avoided, a Livelihood Restoration Plan will be prepared to minimise the associated impacts or compensate for them. During each decision making process, the CLO will ensure that possible impact on the identified vulnerable groups is considered.

6 STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE MECHANISM

The mechanism below is a project specific addition to the general public communication practices the Company is obliged to follow under the legislative requirements and Lenders' requirements (Table 1) or chooses to conduct on its own accord. The mechanism is designed on the basis of available information. After consultation with the aforementioned stakeholders, this mechanism may need to be altered.

Because the common language for all identified stakeholders are Russian, information will be displayed in Russian and Kazakh. International stakeholders will find the Non-Technical Summary and the Stakeholders Engagement Plan in English on the Company's website.

The following information will be disclosed on the Company's website:

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

The following information will be disclosed on the information board:

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

¹ Vulnerable groups includes people who, by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage or social status may be more adversely affected by the project than others and who may be limited in their ability to claim or take advantage of related to development benefits. Vulnerable groups in the context of actual or economic displacement also include people living below the poverty line, the landless, the elderly, women- and children-headed households, ethnic minorities or communities dependent on the natural resource used by the project.

During the plant operation annual reports on environmental and social performance and summary of grievance handling will be placed on the project website and given to the town council to disclose.

Most grievances and suggestions are expected to be received through mailboxes located in the town council, Community Service Centre, via e-mail and phone call to the CLO.

7 RESOURCES AND RESPONSIBILITIES

The Community Liaison Officer (CLO) reports directly to the Company director and is responsible for disclosing information on the Sponsor's website www.cpihzhanatas.kz, on site, city council and community service centre, for dealing with enquiries and for administrative matters related to complaints (receipt/collection, registration in the database of complaints, ensuring compliance with established deadlines, sending mail responses and posting information on information stands or sites). The CLO will also be responsible for publishing bulletins and for regular monitoring of public opinion and vulnerable groups (if any) in Zhanatas, via the Zhanatas Public Governance Council and the councillor.

The CLO will perform the following functions:

- Annual monitoring of the effectiveness of the stakeholders interaction and grievance redress mechanisms and reporting to the management and the lenders with suggestions for improvement;
- Monitoring the web page maintenance;
- Compiling and determining possible responses to the received grievances and remedial actions;
- Participation in disputes resolution;
- Assistance in the annual report preparation and the environmental and social action plan implementation.

8 MONITORING AND REPORTING

The Company will analyse received grievances and responses at the end of each month. The CLO will report annually on environmental and social performance, implementation of commitments in the environmental and social action plan, and the implementation of the grievance mechanism. The report will be posted on the company website and in the locations stated in Table 2.

9 GRIEVANCE REDRESS MECHANISM

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

The stakeholders can submit their grievance in a box, call or write a letter or an email to the CLO who will add it in the grievance database (Table 3). The database is for controlling the grievance handling process. This mechanism does not limit the public's rights to use the conventional routes to place grievances and the available legal system.

Depending on the grievance form, the CLO will reply accordingly, as shown in the flowchart below, ensuring that the grieved party knows their rights, the date when the reply is due and that the grievance will not be closed until the party is satisfied with the answer or choose to follow further complaint procedures given below.

Table 3 Grievance database fields

Grievance ID	Name / Address	Question /Grievance	Answer Method	Given Answer	Status	Is Response satisfying
D/m/y, No.					reply date, closed etc.	yes, no

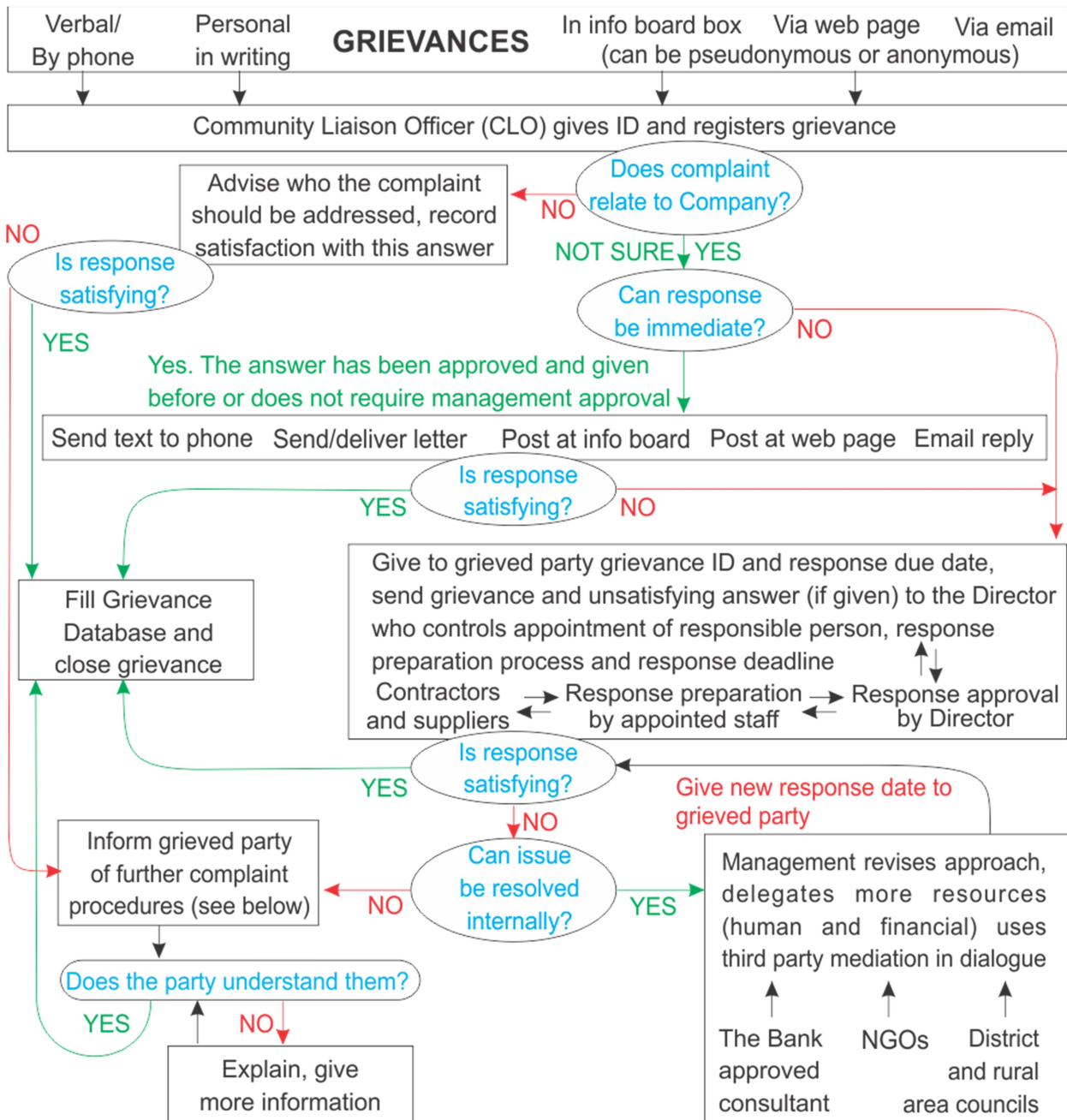


Figure 1 Grievance registering and processing mechanism

- Further complaint procedures:
1. Write a formal complaint to the rural area council, request the reply date
 2. Write a formal complaint to the Regional Prosecution Office
 3. Appeal to the Almaty Aarhus Centre (Aimanov st. 202), or the Convention Implementation Committee by calling to +7(7232)77-57-93 or sending an email to aarhus@inbox.ru

GRIEVANCE FORM		
My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent	How you wish to receive reply: By Post (add address): By Telephone/Text message (add #): By E-mail:	
Preferred response language	<input type="checkbox"/> Russian; <input type="checkbox"/> Kazakh	
Incident or Grievance Description		
What happened? When? Where? Who did it happen to? What is the result of the problem? <div style="text-align: right;"> <input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem) </div>		
What would you like to see happen to resolve the problem? 		
Further complaint procedures if you dissatisfied with given answer		
1. Write a formal complaint to the rural area council, request the reply date 2. Write a formal complaint to the Regional Prosecution Office 3. Appeal to the Almaty Aarhus Centre (Aimanov st. 202), or the Convention Implementation Committee by calling to +7(7232)77-57-93 or sending an email to aarhus@inbox.ru		
For Internal Use		
Reference No:	Registering Date:	Response Due Date:
Given Response:		
<input type="checkbox"/> Due date given to party	<input type="checkbox"/> Response given	Party satisfied with response? <input type="checkbox"/> Yes <input type="checkbox"/> No

Signature (optional):

Date:

Please return this form to Community Liaison Officer (CLO) Mr. Nauryzbek Zhumagazin

Tel.: +7 747 271 14 69, e-mail: nk.zhumagazin@gmail.com, Address: Kazakhstan, Zhambyl Region, Sarysu district, Zhanatas Town, Microdistrict #1, Building 18/4, Office 11 or the Almaty Headquarters: Business Center Evolution, 8th floor, Office #70, Bukhar Zhyrau Boulevard, 26/1.