

KAZAKHSTAN

# KARAGANDA WWTP MODERNISATION PROJECT

## STAKEHOLDER ENGAGEMENT PLAN



February 2024

## LIST OF ACRONYMS AND ABBREVIATIONS

AD	Anaerobic Digester
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
NTS	Non-Technical Summary
PR	Performance Requirements (EBRD)
SEP	Stakeholder Engagement Plan
WWTP	Wastewater Treatment Plant

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# 1 INTRODUCTION

This document is the Stakeholder Engagement Plan (SEP) for the proposed Wastewater Treatment Modernisation Project in Karaganda City (referred to as the 'Project' in the following). The Project is planned by Karaganda Su (KS), which provides water supply and sewage services in Karaganda City. The Project is expected to receive loan finance from the European Bank for Reconstruction and Development (EBRD).

The objectives of the SEP<sup>1</sup> are to:

- Outline a systematic approach to stakeholder engagement that will help Karaganda Su build and maintain a constructive relationship with their stakeholders.
- Provide means for effective and inclusive engagement with Project stakeholders throughout the Project cycle.
- Ensure that appropriate environmental and social information is disclosed, and meaningful consultation is held with the Project's stakeholders and, where appropriate, feedback provided through the consultation is taken into consideration.
- Ensure that grievances from stakeholders are responded to and managed appropriately.

The SEP covers all phases of the Project:

- Scoping process, which was conducted in February – March 2023 and involved initial identification of Project-related key environmental and social issues to be considered in the Environmental and Social Impact Assessment (ESIA).
- The ESIA process, which is conducted in April – November 2023 and involves a baseline analysis (including analysis of existing data and further studies), assessment of positive and negative impacts of the proposed Project, and identification of mitigation and management measures. The ESIA process also includes a 120-day public disclosure period.
- The pre-construction and construction phase of the Project, with construction expected to take place from June 2024 – June 2027.
- The operation phase of the Project after completion of construction in 2027.

The SEP will be publicly available in Kazakh and Russian languages at the Karaganda Su website and as printed copies at the Karaganda Su office:

Karaganda Su  
Privokzalnaya Ave. 5, BIN 93124000052  
Karaganda City  
Tel.: +7 7212 355555  
E-mail: [Info@kar-su.kz](mailto:Info@kar-su.kz)  
Website: <https://kar-su.kz/ru>

The SEP will be subject to regular updates as the Project progresses its implementation.

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<sup>1</sup> The objectives are from EBRD's Environmental and Social Policy, Performance Requirement 10: <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

## 2 DESCRIPTION AND CONTEXT OF PROPOSED PROJECT

The Karaganda Su plans to construct a new wastewater treatment plant (WWTP) for the city of Karaganda on an approximately 49 ha plot of land consisting of the existing WWTP site and adjacent land. This plot is located approximately 5 km to the south-west of Karaganda City.



Figure 2-1: Location of the existing Karaganda WWTP in Karaganda (Source: Google Earth)

The Project comprises the following key infrastructure components:

- Construction of a new WWTP based on activated sludge technology and with design capacity of 100,000 m<sup>3</sup>/day average flow and 130,000 m<sup>3</sup>/day peak daily flow (500,000 P.E.) compliant with national and EU standards for urban wastewater treatment.
- Anaerobic Digestor (AD) line capacity to treat sludge from the WWTP process via primary and secondary digestion resulting in on average 22,000 m<sup>3</sup> biogas/day and output of approx. 100 t/day dewatered digested sludge for further drying (Aquarem estimate). Following drying, resulting in an estimated final treated and dried sludge quantity of approx. 50 tons/day (at 50% dry solids), which can be used as fertilizer or other land rehabilitation.
- A combined heat and power (CHP) facility to produce heat and electricity from biogas generated by the AD facility, with estimated approx. 66,000 kWh/day thermal energy and 50,140 kWh/day electric energy. The power generated by the CHP will be used at the WWTP site. (Aquarem estimate).



The Project will be implemented in line with the national and EU standards for wastewater treatment, EU requirements for sewage sludge management, EU BAT requirements for such facilities and EU taxonomy. Once implemented, the Project will also lead to a reduced level of odour.

Relocation of parts of the existing overhead power lines that are located on the Project site will also be required along the perimeter of the new WWTP. This component will be financed from the municipal budget and is considered an 'associated facility' of the proposed Project.

Construction of the new WWTP is expected to start in June 2024 and to continue for 36 months. It is estimated that approximately 100 workers will be employed by the Contractor for the construction phase, while approximately 50 staff are estimated to be needed during the operation of the new WWTP.

The key areas that may be directly affected by Project activities, and thus falling within the scope of the ESIA, include:

- 1) The **WWTP site** and adjacent area where physical and biological impacts (such as odour, noise, contamination, etc.) can be felt, including areas used for sludge management.
- 2) **Main roads to and from the WWTP site**, where heavy transport can be a source of impacts.
- 3) **Inhabited areas** close to the WWTP site.
  - Kir-zavod 3-4 (approx. 800 m on the north side of WWTP) has approx. 83 houses.
  - Proizvodstvennaya Street (approx. 505m north-east of the proposed WWTP site), two houses in close proximity to the WWTP.
  - Railway junction 737 (approx. 530m on the east side of proposed WWTP site), where residents have a clear view to the WWTP; 34-40 families live in 17-20 houses.
  - Fedorovka micro district.
- 4) **Waterways** downstream from the WWTP, where effluents are discharged and impacts on water quality may be felt, including sedimentation ponds (bioponds), the discharge channel at the south of the existing WWTP and the Sokur River (considered approx. 500m above and 2,500m below the discharge point of the discharge channel to the river).
- 5) **Arable and horticulture areas** using either treated effluent water for irrigation and/or sludge or digestate from the WWTP.

The social setting of the Project in terms of residential areas, population, and distance to WWTP operations is set out in the table below.

*Table 2-1: Residential areas relatively close to the proposed new WWTP*

Settlement	Distance to WWTP
Kir-zavod 3 and 4	800 m north-west of the new WWTP
Proizvodstvennaya Street	505 m north-east of the new WWTP
Railway Junction 737	530 m east of the new WWTP

Furthermore, the IP MetalWork is located 1 km east of the new WWTP area, while several other industries are located 1.3-2.2 km from the WWTP.

The area of wider Project influence includes all parts of Karaganda City where the benefits of the WWTP will be felt, such as economic opportunities associated with employment during the construction phase and improved wastewater treatment after the new WWTP is operational.

The above key features are reflected in the figure below.

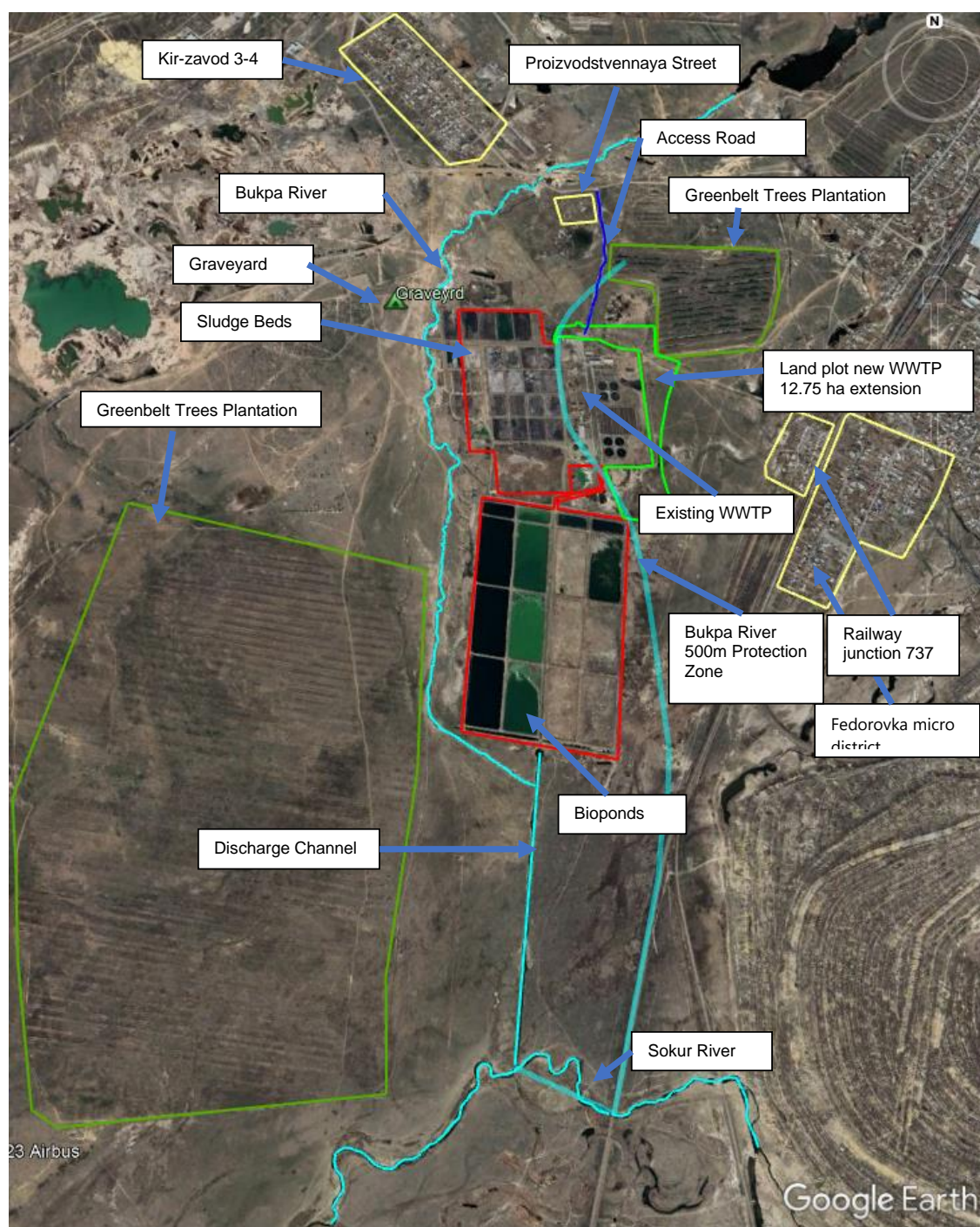


Figure 2-2: The project area of the proposed WWTP Project, consisting primarily of the existing and new WWTP sites, sludge management sites, the discharge channel to the Sokur River, the Bukpa River and associated protection zone, greenbelt forests, houses and set

### 3 NATIONAL REGULATORY REQUIREMENTS

Procedures for consultations with the public, disclosure of information and grievances relevant for this Project are covered under the existing Kazakh legislation, particularly the Law on Access to Information of November 16, 2015, with amendments as of January 12, 2023. This law regulates public relations arising from the realization of the constitutional right of everyone to freely receive and disseminate information in any way not prohibited by law. Access to information is based on the following principles: legality; openness and transparency of the activities of information owners; reliability and completeness; relevance and timeliness; equal access to information; non-disclosure of state secrets and other secrets protected by law; inviolability of private life, personal and family secrets; observance of the rights and legitimate interests of individuals and legal entities. The procedures are also informed by the Convention on the Access to Information, the Public Participation in Decision Making and the Access to Justice in Environmental Matters (the Aarhus Convention), which Kazakhstan ratified in 2000.

As stated in Article 73 of the Environmental Code, a National Environmental Impact Assessment (EIA) requires publicly disclosure for 30 calendar days on governmental websites. The public disclosure period is to include one public hearing meeting. An announcement about the place and time of the public hearing meeting is to be made in Kazakh and Russian in at least one newspaper and through at least one TV or radio channel. This announcement shall be made at least 20 days before the public meeting. Comments and suggestions can be submitted during the meeting and through the governmental website(s) and e-mail.

### 4 OTHER REQUIREMENTS

EBRD's Performance Requirement on Information Disclosure and Stakeholder Engagement (PR 10) is to be fulfilled, and the current Stakeholder Engagement Plan is formulated in accordance with this. As stated in PR10, Category A projects (like the current Project) require that a formalised, participatory disclosure and consultation process is built into each stage of the ESIA. This involves incorporating into the decision-making process the views of affected parties on matters that affect them directly. Documents prepared as part of the ESIA for public sector projects are to be publicly disclosed for 120 calendar days. The ESIA documents are to be kept in the public domain throughout the life of the project, which for this Project is the responsibility of Karaganda Su. The company is also to provide regular reports on environmental and social performance to stakeholders. These reports are to be disclosed at least annually.

Further details on PR10 are included in EBRD's Environmental and Social Policy, which can be found on: <http://www.ebrd.com/environmental-and-social-policy.html>.

Minutes or summaries of stakeholder meetings and discussions will be publicly disclosed as part of the ESIA report.

### 5 IDENTIFICATION OF KEY STAKEHOLDERS

As mentioned in chapter 5, the identification of key Project stakeholders started during the scoping phase. This continued during the ESIA process. The two sections below present an overview of the identified key stakeholders.

#### 5.1 Community-level stakeholders

The table below lists community-level stakeholders, particularly those that live relatively close to the WWTP.



Table 5-1: Community-level stakeholders

Community-level stakeholders	Population	Distance to proposed WWTP
Residents in the settlements of Railway Junction 737	34-40 families	530 m east of the new WWTP
Residents in Kirzavod 3-4 hamlet	324 persons	800 m north-west of the new WWTP
Residents on Proizvedstyannya street	1 person	505 m north-west of the WWTP
Residents in Karaganda City		Other residents in Karaganda City than those mentioned above are located relatively far away from the WWTP.
<b>Local businesses</b>		<b>Distance to proposed WWTP</b>
IP "MetalWork"	-	1 km east of the new WWTP area
Karaganda Boiler Plant LLP	-	1.3 km east of the new WWTP area
KarPlaz LLP	-	1.3 km east of the new WWTP area
Kurylsmet LLP	-	1.4 km east of the new WWTP area.
Common Market Corporation LLP	-	1.4 km east of the new WWTP area

Discussions with residents in the Proizvodstvennaya street, Kir-zavod, and Railway Junction 737 during the ESIA process indicate that the most important priority for them is the elimination or reduction of unpleasant odours from the existing WWTP.

Several industries are located next to the access road and may experience minor disturbance due to construction traffic, while no other impacts are foreseen.

There is currently no reuse of sludge from the Karaganda WWTP for agricultural or other land use purposes. While there is no agricultural land in the immediate vicinity of the WWTP, there appear to be opportunities for local re-use of effluent within the green belt forestry area. The proposed WWTP project will result in significant improvement of effluent quality as well as in treatment of sludge from the WWTP process, compared to the current situation. This creates opportunities to further enhance the positive impacts of the project.

Residents in Karaganda City more generally are also key stakeholders, as they will benefit from the improved wastewater treatment resulting from the Project and may also benefit from the employment opportunities occurring during the construction phase.

## 5.2 Key state, regional and city departments

Karaganda City is part of Karaganda Region, and some of the departments under the Akimat of Karaganda Region play an important role in relation to this Project as explained further below.

Several departments under the Akimat of Karaganda City are key stakeholder for this Project. Karaganda Su, which is the proponent of this Project, is a limited liability company, with 51% municipal and 49% private ownership, and reports to the Karaganda City Akimat through the Department of Public Utilities, Passenger Transport and Highways of Karaganda.

Important state, regional and city departments for this Project include:

*Table 5-2: Important regional and city departments and their roles in relation to this Project*

<b>State, Regional and City Departments</b>	<b>Role in relation to Project</b>
<b>State Departments</b>	
Balkhash-Alakol Basin Inspection	Compliance with legislation, e.g., on approvals related to the Sokur river and Bukpa river.
Bureau of National Statistics	Collecting and compiling statistics on, among others, population, and socio-economic aspects.
KazHydromet	Statistical information about air quality, data from Hydropost.
Karaganda City Police Department	Collecting information about, among others, traffic safety and accidents.
<b>Akimat for Karaganda Region</b>	
Energy and Communal Department of Karaganda Region	Compliance with legislation, e.g. on approvals.
Department of Natural Resources and Regulation of the Use of Natural Resources	Compliance with legislation, e.g. on approvals for MPC for atmosphere air.
Department of Culture, Archives and Documentation of Karaganda Region	Registering and listing cultural heritage, approval to build new WWTP.
Department of Land Relations	Compliance with legislation, e.g. on approvals.
Karaganda Region Department for Coordination of Employment and Social Programmes	Number of Ukrainian refugees
<b>Akimat for Karaganda City</b>	
Department of Housing and Communal Services, Passenger Transport and Highways	KS, a 51% municipal-owned enterprise, reports to the Karaganda City Akimat through this department. Compliance with legislation, e.g. on approvals.
Land Management Department	Compliance with legislation, e.g. on approvals.
Department of Employment and Social Programmes of Karaganda city	Statistical number about different type of population
Internal Policy Department of Karaganda city	Collecting information about NGOs
Department of Architecture and Urban Planning of Karaganda city	General plan and projects of Karaganda City
Office of the Akim of the district of Kazybek bi of Karaganda city	The district where WWTP is located
Department of Land Relations	Compliance with legislation, e.g. on approvals
<b>NGO/CSO</b>	
Ecocenter	Collecting information on environmental concerns
EsoMusey	Collecting information on environmental concerns

Karaganda City is divided into two districts: Kazybek bi District and Alikhan Bokeikhan District. The Akimats of the two districts, which are the lowest administrative level in Karaganda City, report to the Akimat of Karaganda City. The responsibilities of the district Akimats include, among others, implementation of the state employment policy, assessment of the need for social assistance in accordance with local regulations and provision of support to low-income and large families, door-to-door public awareness raising in relation to health and social support. The two district Akimat are expected to support KS with organisation of public meeting(s) during the public disclosure of the ESIA package.

## 6 STAKEHOLDER ENGAGEMENT DURING SCOPING PHASE

The identification of key stakeholders started during the scoping process and are listed in the stakeholder analysis presented in chapter 6 below. These include but are not limited to residents living in settlements relatively close to the existing and the proposed new WWTP. During the scoping phase, attempts were

made to identify spokespersons for the following settlements: Railway Junction 737 and Kir-zavod 3-4 settlement. This was, however, not possible as they form part of the city and therefore do not have any separate administration or other official representatives.

The following stakeholder meetings were held during the scoping phase:

- 2 February 2023: Kick off-meeting with Karaganda Su with discussions about the ESIA process and work schedule, including an overview of information requirements and potential stakeholders.
- 15 February, 21 February and 6 March 2023: Meetings with Aquarem with discussions about the contents and time schedule for the local Feasibility Study for the Karaganda WWTP.
- 1 March 2023: Meeting with the following stakeholders:
  - Department of Natural Resources and Environmental Management,
  - Department of Emergency Situations of Karaganda, and
  - Karaganda Su (a previously planned stakeholder meeting with more stakeholders (Department of Sanitary and Epidemiological Control of Karaganda Region,
  - Department of Emergency Situations of Karaganda City,
  - Balkhash-Alakol Basin Inspectorate,
  - Department of Natural Resources and Regulation of Nature Management of Karaganda Region and representatives of Karaganda Su) had to be cancelled due to stakeholders' lack of interest).
- 29-31 March 2023: Brief interviews with a few residents living relatively close to the existing WWTP.

The ESIA team conducted a site visit to the existing and proposed WWTP sites in the period March 29<sup>th</sup> to 31<sup>st</sup> 2023, which included meetings with Karaganda Su staff and the authors of the local feasibility study for the new WWTP (Aquarem) as well as five brief interviews with residents living relatively close to the existing WWTP. The meetings were not pre-arranged and were conducted with residents who were available during the visit. Residents met were mainly retired elderly men and women. The meetings and observations made informed the ESIA scoping process.

The minutes of the 1 March 2023 meeting and the five brief interviews on 29-31 March 2023 are included in the ESIA Report.

A simple media search was conducted during the scoping phase to determine whether any relevant issues regarding the Project, Client or Beneficiary have been reported through the media. This media search identified several published articles regarding odour from the WWTP and (untreated) sewerage flowing into the Bukpa River due to breakage of sewage pipes.

## 7 STAKEHOLDER ENGAGEMENT DURING ESIA PROCESS

### 7.1 Data collection from city and regional departments

During the ESIA, data were collected from many departments in Karaganda City and Karaganda Region, including many of the departments mentioned in section 6.2. above. These data, as well as data from Karaganda Su, are included in the baseline sections of the ESIA report and provide insights to the impact assessment contained in the same report.

### 7.2 Community-level stakeholder engagement

#### 7.2.1 Individual meetings with households nearest to the WWTP in March 2023

Several residents were met during site visit conducted in March 2023. These meetings were conducted informally with one resident in Proizvodstvennaya street, two residents in Kir-zavod, and two residents in Railway Junction 737.

### 7.2.2 Focus group discussions during September 2023

Two focus group discussions (FGDs) were held in September with residents living relatively close to the existing WWTP, i.e., in Railway junction 737 and Kirzavod 3-4 settlement, while one FGD was with NGOs and activists. The table below characteristics of the participants in the three FGDs.

The table below provides characteristics of the participants in the three FGDs.

*Table 7-1: Overview of FGDs*

<b>Nº</b>	<b>FGD participants</b>	<b>Description</b>
1	FGD with 8 residents (2 women and 6 men) from Railway Junction 737.	Participants were from both low-income and middle-income households and included young women, men with children, men and elderly women. Participants lived relatively close to the creek/Sokur river.
2	FGD with 11 residents (2 men and 9 women) from Kir-zavod 3-4.	Participants were from both low-income and middle-income households and included young men, women with children, men and elderly women. Participants lived relatively close to the creek / Sokur river.
3	FGD with NGO and activists.	Participants were from Karaganda city Eco Museum and activists.

According to information received from FGDs with residents in the Railway Junction 737 there are no poor households in the settlement, while four community members have disabilities. Most residents in Kirzavod 3-4 settlement are retired but not considered poor or vulnerable.

In Proizvodstvennaya Street there is only one permanent resident. Interviews with this resident revealed that some of the abandoned houses in the street are occasionally used overnight by homeless persons. The resident is considered vulnerable as he does not relate to the social structures of the neighbouring residential areas, has unspecified health issues, and are the closest resident to the WWTP.

The unpleasant smell from the existing WWTP was highlighted both by women and men in the three FGDs. They experience a strong smell especially during the summer and in windy weather. In these periods, they did not want to open their windows, their laundry had to be dried inside their houses, and some were embarrassed to invite guests. The smell from the WWTP was reported to have a negative impact on residents generally in the settlements and particularly on people with respiratory diseases and on children.

FGD participants hoped that the construction and subsequent operation of the new WWTP would lead to the disappearance of the strong and unpleasant smell from the existing WWTP. Several people in the mentioned settlements were expected to be interested in employment during the construction of the new WWTP.

The following were the preferred communication channels mentioned for future information about the proposed new WWTP:

- The WhatsApp groups in the settlements.
- Social media (Instagram and Facebook).
- Community activists.

There was some interest in participating in future consultation meetings concerning the new WWTP.

As there is a public school in Kir-zavod 3-4 it is planned to conduct the public hearing meeting there with attendants of residents from Railway Junction 737, Proizvedstvennaya street and Kir-zavod 3.4.

### 7.3 Public disclosure and consultation

In accordance with EBRD requirements for a Category A project, the public disclosure process will take place over a 120-day period during February – June 2024.

The following documents will be disclosed during this period:

- ESIA report for the Project
- Environmental and Social Management Plan (ESMP) for the Project
- Non-Technical Summary of the ESIA Report and the ESMP
- Environmental and Social Action Plan (ESAP) listing corporate actions to be taken by Karaganda Su
- Stakeholder Engagement Plan (SEP) for all phases of the Project (this document)

The above-mentioned documents will be available at the website of Karaganda Su:

In English: <https://www.kar-su.kz/en/cooperation-ebrd>

In Kazakh: <https://www.kar-su.kz/kk/ekdb-men-yntymaktastyk>

In Russian: <https://www.kar-su.kz/ru/sotrudnichestvo-s-ebrr>

The documents will also be available as printed copies at the Karaganda Su office (see address in chapter 11). Printed copies can furthermore be made available upon request in EBRD Resident Offices in Astana:

- EBRD Resident Office in Astana, 2 Dostyk Street, SAAD Business Center, 10th floor, Astana City.

During this period, the public and other stakeholders will have the opportunity to provide comments on the mentioned ESIA documents. Comments on the WWTP project and the local Environmental Impact Assessment were provided during two public meetings held on 26 and 31 January 2024. Further comments on the WWTP project and the above-mentioned ESIA package can be provided at a specific telegram page to be established by Karaganda Su.

The purpose of the specific telegram page is to give residents and other stakeholder groups an opportunity to discuss and provide feedback on the mentioned ESIA package. The telegram page will have a link to a presentation based on the Non-Technical Summary of the ESIA Report and the ESMP. This will include an overview of the continuous stakeholder engagement through all phases of the Project, as explained in chapter 1 above.

Written comments to the ESIA documents can also be provided through the e-mail address of Karaganda Su, and by delivering or sending them to the head office of the company. Contact details are included in chapter 11 below.

Karaganda Su will provide information about the above-mentioned ESIA documents and the specific telegram page through the company's own website, social media, WhatsApp groups, the two district Akimats of Karaganda, and the mass media.

Following the disclosure period, activities during this period as well as comments received from the public and other stakeholders and the Consultant's responses to these will be summarised in a Consultation Report. The ESIA documents will be amended based on the feedback during the public disclosure and submitted to EBRD and the Karaganda Su for final approval. The final ESIA documents will be available in Kazakh and Russian languages at the website of the Karaganda Su.



## 8 STAKEHOLDER ENGAGEMENT DURING THE PRE-CONSTRUCTION AND CONSTRUCTION PHASE

### 8.1 Disclosure of information

Karaganda Su will, before the start of construction, provide information to the community-level stakeholders mentioned in section 6.1 above. The main contents of this information are outlined in the table below. Information will be distributed in all areas of Karaganda City, with particular focus on the settlements within relative proximity of the new WWTP.

The initial information will be distributed through press releases and brochures (the latter mainly in the settlements relatively close to the construction site) with contents as those outlined in the table below. Information on the Project, the time schedule, and opportunities for public comments will also be posted in local newspapers in Kazakh and Russian languages. In addition, information will be available upon request.

*Table 8-1: Outline contents of project information*

Headings	Outline content
Main organisations	The Karaganda Su is the organisation overall responsible for the design and construction activities as well as the subsequent operations. In line with this, Karaganda Su is responsible for stakeholder engagement and communication activities during design, construction, and operations.
Main Project investments	A new WWTP, as described in chapter 2 above.
Estimated timeframe for construction of new WWTP	June 2024 – June 2027
Areas to benefit / be affected	All areas of Karaganda City
Opportunities and benefits	<p>The main benefits are:</p> <ul style="list-style-type: none"> <li>• An estimated 500,000 residents will benefit from access to a fully functional WWTP.</li> <li>• Some reduction in water and sanitation related diseases and associated improved living conditions.</li> <li>• A functioning WWTP will be a major improvement compared to the current WWTP and will reduce odour levels.</li> <li>• Employment opportunities during the construction phase, with recruitment by the selected construction contractor(s).</li> </ul>
Impacts during construction due to Project activities and expected notification of mitigation actions to be applied	<p>Announcements on temporary interruptions of the wastewater services, if any (if any interruptions, they are likely to only be when transferring from the old to the new WWTP).</p> <p>Furthermore, information about stakeholder engagement activities and the community grievance mechanism to be provided.</p>
Announcement of planned public hearings when the draft detailed design is available	<p>Announcement about public hearing meetings should be published in Kazakh and Russian 20 days in advance. This should include a description of the public hearing process in the context of the Project, including:</p> <ul style="list-style-type: none"> <li>• Place and time of the public hearing meetings.</li> <li>• Time frame: 20 days for provision of comments, complaints, and proposals from the public.</li> <li>• Time frame: 1 month for authorities to react and consider complaints and proposals.</li> </ul>

Headings	Outline content
Review and approval of the Project	<ul style="list-style-type: none"> <li>A description of the final review process by other external authorities and approval of the Project.</li> <li>Time frame: 3 weeks for review.</li> </ul>
General grievance procedure during construction	<ul style="list-style-type: none"> <li>Description of the grievance procedure</li> <li>Organisation to contact: Karaganda Su Privokzalnaya Ave. 5, BIN 931240000052 Karaganda City Tel.: +7 7212 355555 E-mail: Info@kar-su.kz Website: <a href="https://kar-su.kz/ru">https://kar-su.kz/ru</a></li> </ul>
Local and site-specific information	Local and site-specific information will be distributed through the two districts of Karaganda City, WhatsApp groups, and cooperatives of apartment owners. The mentioned organisations can also contact Karaganda Su for additional local and site-specific information.

The table below shows how information will be disclosed.

*Table 8-2: Means of Disclosing Information*

Institution Responsible	Means of Information Disclosure	Target groups
Karaganda Su	<ul style="list-style-type: none"> <li>Brochure with contents as described in the previous table</li> <li>Stakeholder Engagement Plan</li> <li>Non-Technical Summary</li> <li>Announcement in local newspapers, in Kazakh and Russian languages, with the same overall contents as in the brochure</li> </ul>	Residents (women and men) in Kir-zavod 3-4, Railway Junction 737 and Proizvodstvennaya Street.  Nearby industries.
Karaganda Su in cooperation with the two district Akimats of Karaganda City	<ul style="list-style-type: none"> <li>Distribution of brochure in public places in the Project area including for example schools and shops.</li> <li>Information through public consultation meetings.</li> <li>Response to local inquiries.</li> </ul>	
Karaganda Su	<ul style="list-style-type: none"> <li>Prior to construction, notification of the start of construction, e.g., through WhatsApp groups and social media, including contact telephone number for Karaganda Su for emergencies or grievances.</li> </ul>	
Karaganda Su	<ul style="list-style-type: none"> <li>Overall contact point for information during implementation of the Project and on request distributor of information on progress of work as described in approved reports and minutes of meetings.</li> <li>During construction responsible for structured responses to grievances (see section on grievance procedures)</li> </ul>	All stakeholders

## 8.2 Public consultations

The public consultation during the pre-construction and construction phase will be a continuation of the consultations that took place during previous phases of the Project. It will especially build on the experience from the consultations that will take place during public meetings in January 2024 and as part of the public disclosure of draft documents from the ESIA process in February – June 2024.

It is expected that two public meetings will be held during the pre-construction and construction phase:

1. A public meeting at the head office of Karaganda Su.
2. A public meeting in the Kir-zavod settlement to ensure easy access for communities and other stakeholders in the vicinity of the proposed WWTP.

The meetings will be held in Kazakh and/or Russian, as relevant. The specific dates and places for the public meetings, with presentation of details of the detailed design of the new WWTP, will be decided when the draft detailed design is available, and this SEP will subsequently be updated. The public meetings will be arranged with the purpose of giving residents and other stakeholder groups an opportunity to discuss the Project and provide feedback at the design stage where adjustments can still be made. At these hearings, all types of project-related questions and proposals can be raised. This may include questions related to the future tariffs for wastewater services. If beneficial, follow-up public meetings may be held.

Karaganda Su will provide information about the venues and times of the public meetings. Such information will be provided through the company's own website, social media, WhatsApp groups, the two district Akimats of Karaganda, and mass media. Both women and men will be encouraged to attend the public meetings and comment on the detailed design presented during the meetings and/or provide written proposals and comments.

The conclusions of the public meetings will be agreed during the meetings and recorded. Minutes of public hearing meetings will be published on the website of the Karaganda Su within 7 days of the meetings. All justified comments and proposals will be addressed and incorporated into the final design before submission to relevant authorities for approval.

## 9 STAKEHOLDER ENGAGEMENT DURING THE OPERATION PHASE

Karaganda Su provides information on a variety of topics during its current operations. The company will provide additional information about the operations of the new WWTP when construction is complete, and it is put into operation. This will, among others, include the following topics:

- The operations of the new WWTP.
- The benefits of the new treatment processes compared to those of the old WWTP.
- Potential tariff increases due to the investments in a new WWTP.
- Information on the environmental and social performance of Karaganda Su, including in relation to the operations of the new WWTP (to be provided annually).

The following are the main communication channels currently used by Karaganda Su:

- Social media, such as Instagram (@karagandysu), Facebook (karagandasu), WhatsApp (+7 778 089 4931), Telegram @qaragandy\_su\_bot).
- E-mails ([info@kar-su.kz](mailto:info@kar-su.kz)).
- Television.

- Newspapers: Karaganda Su has an agreement with local newspapers to bring articles about their work and plans.
- The website of Karaganda Su: <http://kar-su.kz/ru>
- Own public meetings on specific topics or in a specific geographical area, e.g., due to grievances received.

The above and/or similar communication methods will be used during the operations phase of the new WWTP.

## 10 PUBLIC GRIEVANCE MECHANISM

### 10.1 Public grievance mechanism during pre-construction and construction phase

For the purposes of this Project, Karaganda Su has a specific grievance mechanism for any concerns and complaints to be handled in a systematic way, which is in accordance with the stipulations of the Law on Grievances Handling procedures № 221-III, 12.01.2007, as well as the requirements of EBRD.

During the construction phase, all communication on grievances from the public will be channelled through Karaganda Su, which will handle all grievances that may arise during the construction works such as about noise, dust, and traffic problems.

The person(s) responsible for grievances at the construction site will be determined by Karaganda Su. The responsible person(s) will be trained on the implementation of the procedures. To keep track of the grievances about the work of the contractors, a handbook will be opened with a column where the contractor's name will be noted together with the recorded complaint and the date of receipt. Grievances will be sent directly to the contractors in written form, and they will be asked to give written information to Karaganda Su about the status of the problem within seven days. The issues will also immediately be discussed with the contractor representatives in informal meetings to speed up the process. Contractors' response and actions taken along with reasons will be recorded in the handbook together with the dates. The complainants will be informed about the proposed corrective action, or it will be clarified why action is not required or possible within 15 days.

Karaganda Su will require contractors to provide a grievance mechanism for their workers, enabling them to report any grievances they may have at their workplace. However, the grievance mechanism operated by Karaganda Su will also be open for the contractors' workers to use, e.g., in situations where complaints have not been attended to by the contractors or where the workers might fear retaliations if they were to complain to the contractors as their employer. At the start of the different contractors' work, Karaganda Su will inform the contractors' workers about the grievance mechanism operated by Karaganda Su and provide the name and contact details of the contact person. Karaganda Su will ensure that it is easy for workers to submit their possible grievances through its contact person, who will ensure transparent feedback without any retribution. If the workers wish so, their complaints will remain anonymous. Workers will be encouraged to submit complaints in writing, but they can also be submitted orally to the contact person of Karaganda Su.

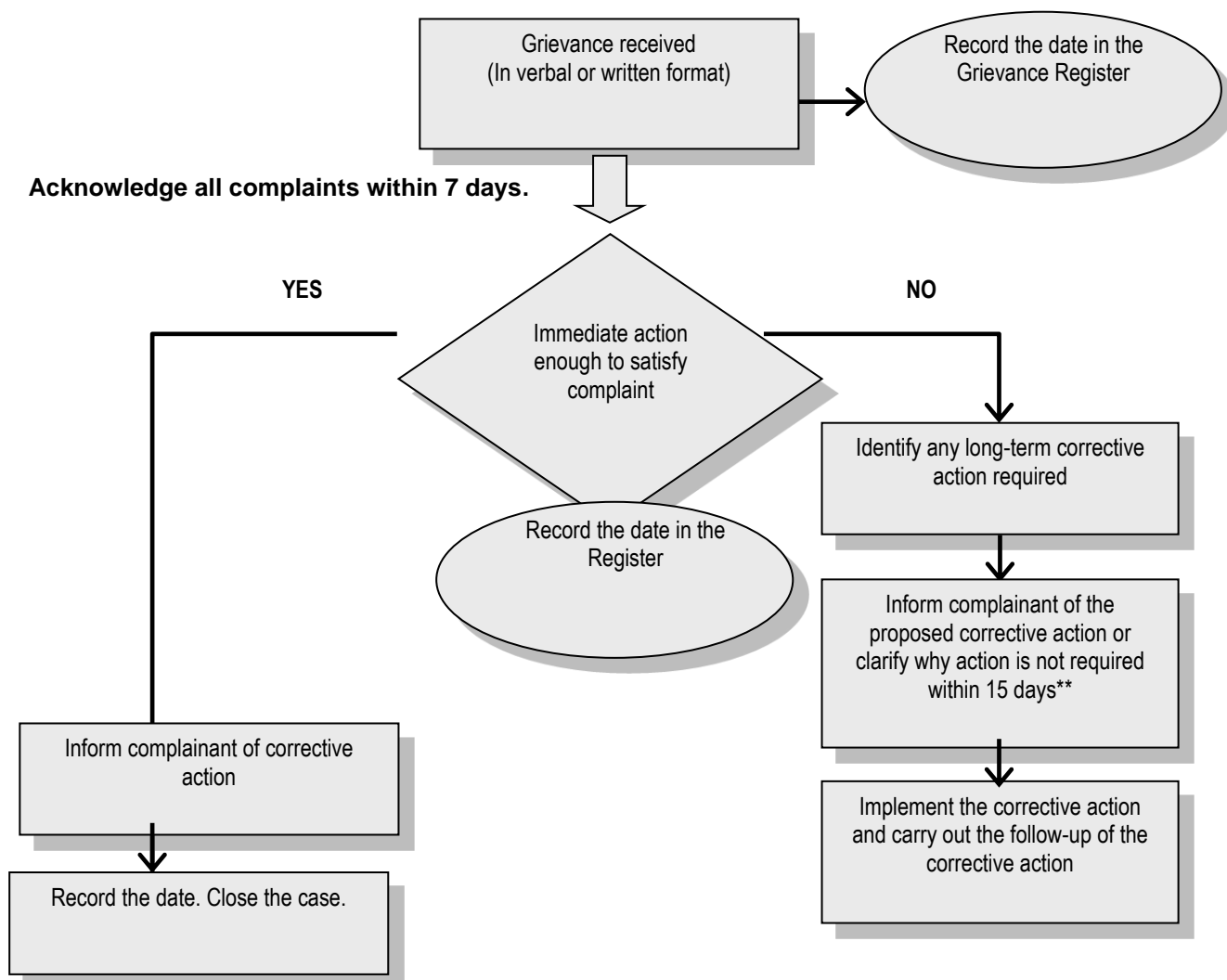
The public grievance mechanism is to be applied as described in the figure below. All grievances will be registered, along with the status of the investigation into the problem and its resolution, as appropriate. Keeping the timeframes for response to complainants, as shown in the figure, will be the criteria used to assess whether the grievance mechanism is implemented successfully.

## 10.2 Public grievance mechanism during operation phase

Karaganda Su has a mechanism for complaints related to their services. It will strengthen this mechanism, based on the experience of implementing the mechanism described above for the Project construction phase.



### Flowchart for Processing Grievances\*



\* Karaganda Su will improve its registration of grievances at the start of the Project and appoint units to be responsible for the different actions in this flow chart.

\*\* Depending on the type of grievance, this deadline might be extended with an additional 30 days.

Figure 10-1: The Grievance Procedure

For each case of grievance, a record sheet shall be filled in either by the complainant in cases where the complainant appears personally at the Karaganda Su office or when receiving a complaint by phone, e-mail, social media, post or through the Karaganda Su website. Karaganda Su will review the public grievance form included below before the start of the Project.

**Public Grievance Form**

It is possible to submit an anonymous grievance. If you wish to submit an anonymous grievance, you should not submit your contact information. Submitting an anonymous grievance means you will receive no response to your grievance.

<b>Reference No:</b>	
<b>Name and Surname</b>	
	<input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
<b>Contact Information</b>  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____ <input type="checkbox"/> By Telephone: _____ <input type="checkbox"/> By E-mail: _____
<b>Preferred Language for communication</b>	<input type="checkbox"/> Kazakh <input type="checkbox"/> Russian
<b>Description of Incident or Grievance:</b> What happened? Where did it happen? Who did it happen to? What is the result of the problem? _____ _____ _____	
<b>Date of Incident/Grievance</b>	
	<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)
<b>What would you like to see happen to resolve the problem?</b> _____ _____ _____	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Please return this form to:**

Karaganda Su  
 Privokzalnaya Ave. 5, BIN 931240000052  
 Karaganda City  
 Tel.: +7 7212 355555  
 E-mail: Info@kar-su.kz  
 Website: <https://kar-su.kz/ru>

### 10.3 EBRD's Independent Project Accountability Mechanism

In addition to project level grievance mechanism managed by **Karaganda Su**, the EBRD's Independent Project Accountability Mechanism<sup>2</sup> (IPAM) is an independent complaint process available to stakeholders, where the project level grievance mechanism fails. The IPAM aims to facilitate the resolution of social, environmental, and public disclosure issues raised by the project-affected people and civil society organisations about EBRD financed projects and if resolution is not possible, then initiate compliance review to establish whether the Bank's Environmental and Social Policy was complied with.

## 11 CONTACT INFORMATION

Karaganda Su is responsible for stakeholder engagement during all phases of the Project, including the scoping process, the ESIA process, the pre-construction and construction phase, and the operation phase. The relevant contact information is:

Ms. Shadyar Satbaevna Zhunusova, Head of Project Development and Support Department  
 Karaganda Su  
 Privokzalnaya Ave. 5, BIN 931240000052  
 Karaganda City  
 Tel.: +7 7212 561914, internal number 1107  
 E-mail: [Info@kar-su.kz](mailto:Info@kar-su.kz)  
 Website: <https://kar-su.kz/ru>

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<sup>2</sup> <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>