

KAZAKHSTAN

# KARAGANDA WWTP MODERNISATION PROJECT

## ENVIRONMENTAL AND SOCIAL ACTION PLAN



February 2024

## LIST OF ACRONYMS AND ABBREVIATIONS

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

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

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

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	documents as appropriate, contractually requiring contractors to apply these standards and provide for mitigation of non-compliance; – Overseeing that contractors have the knowledge and skills to perform their project tasks in accordance with contract conditions; – In the case of subcontracting, requiring that contractors have similar arrangements with their subcontractors; – Audit contractors' compliance against requirements made.						
1.6	At the corporate level, KS to improve its reporting on E&S performance in line with good international practice, and to meet the needs of IFIs with regards to a) corporate level E&S performance and b) specific investment project E&S performance.	Optimisation of the management of the environmental, social, and health & safety aspects.	EBRD PR1, paragraphs 29-35	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable, then on an ongoing basis.	Monitoring and reporting framework for corporate and project E&S performance approved by EBRD.	
<b>PR2</b>	<b>Labour and Working Conditions</b>						
2.1	At the corporate level, KS to develop and implement measures to encourage and support women in applying for (top) management positions.	Ensure diversity in management and the benefits this entails for the company and its employees.	EBRD PR2, paragraph 14	Internal resources, external consultants Responsibility: KS	Starting within 6 months of commencement of project activities.	Measures documented and implemented. Increase in proportion of women in management positions.	
2.2	At the corporate level, KS to prepare and implement a policy on gender-based violence and harassment (GBVH), inform employees and non-employee workers about the policy and encourage them to report concerns and incidents of GBVH through the staff grievance mechanism.	Ensure that incidents and concerns about GBVH are taken seriously and addressed.	EBRD PR2, paragraph 14, 21	Internal resources, external consultants	Within 6 months of commencement of project activities.	Policy on GBVH prepared and disseminated, aiming at	

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	It should be ensured that grievances can be submitted confidentially, if this is preferred and that the relevant staff is trained on how to address GBVH grievances.			Responsibility: KS		prevention of GBVH. The grievance mechanism prepared to receive and address cases of GBVH.	
2.3	At the corporate level, KS to review and strengthen its existing employee grievance mechanism, which should include registration of grievances but still allow for grievances to be treated confidentially, where employees prefer this. A clear description of the employee grievance mechanism is to be prepared and disseminated to all employees. This should include information on the role of the conciliation committee and its members and allow for complaints from non-employee workers (such as contractors, consultants and others engaged by KS).	Ensure the health and well-being of KS staff and non-employee workers and optimise work performance.	EBRD PR2, paragraph 21 National Labour Law	Internal resources, external consultants Responsibility: KS	Within 6 months of commencement of project activities	KS employee grievance mechanism updated and clearly described. Evidence of awareness raising on the grievance mechanism with KS employees and non-employee workers.	
2.4	At the corporate level, KS is to offer all employees (including managers) training based on their job descriptions (i.e., continuous professional development), and networking with other water companies in Kazakhstan should be considered, e.g., in relation to good management practices of WWTPs (benchmarking against other water companies in Kazakhstan). Staff responsible for environmental and social management should be trained in environmental and social monitoring and reporting ensuring capacity for the ESAP implementation.	Ensure capacity to implement the ESAP	EBRD PR2	Internal resources, external consultants Responsibility: KS	Starting within 12 months of commencement of project activities	Documented evidence of training.	
2.5	KS shall promptly, but no later than 60 days before any decision is taken in respect of any planned redundancy, inform EBRD if such redundancy affects at least 10% of its total	Minimisation of job losses and compliance with Collective Agreement and EBRD's PR2.	National labour Code	Internal resources,	60 days prior any planned redundancies	Redundancies are avoided or minimised; Retrenchment	

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



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	international good practice and standards (e.g., Greenhouse gas protocol).			Responsibility: KS	operation start as applicable.	approved by EBRD.	
3.4	Within the corporate level ESMS (and as appropriate the resource management and conservation plan), KS is to develop and implement <b>hazardous materials management plan</b> outlining procedures and actions to continuously ensure oversight of hazardous materials used in the company, and their appropriate management based on risk assessment, as well as initiatives to reduce the use of hazardous materials.	Optimisation of KS's environmental performance.	EBRD PR3, paragraphs 22-23	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable.	A hazardous materials management plan has been developed and approved.	
3.5	<p>KS to fully implement project level requirements as outlined in the ESMP. This applies to the WWTP project and associated power line relocation and includes but is not limited to specific management and monitoring plans outlined in the ESMP, such as:</p> <ul style="list-style-type: none"> <li>• A plan for closing and rehabilitating the existing sludge pond area.</li> <li>• A plan for reusing effluents and sludge.</li> <li>• An emergency plan for WWTP operations.</li> <li>• ESMP monitoring and operational environmental monitoring plans.</li> <li>• Develop and implement a structured odour monitoring and management regime based on recognised methods.</li> </ul> <p>KS must also ensure successful implementation of contractor management plans, including the CESMP through management and monitoring of contractors (see PR1).</p>	Environmental risks and impacts associated with construction and operation of the proposed WWTP and closure of existing WWTP facilities.	National requirements EBRD PR3, PR4 (adaptation related) Good international practice	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to pre-construction, construction and operation start as applicable and as outlined in the ESMP.	The ESMP and its respective specific sub-plans and monitoring completed as outlined in the ESMP.	



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PR4	<b>Health, Safety and Security</b>						
4.1	At the corporate level, KS to strengthen its OHS management monitoring by introducing <b>registration of minor injuries and near-misses</b> .  At the corporate level, KS to ensure that requirements related to <b>OHS management</b> is in line with national as well as international good practice are <b>included in tendering documents and contracts with service providers</b> (see also point 1.5 above).	Optimisation of KS's worker health and safety performance.	EBRD PR4, paragraphs 11-15	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	Procedures integrated in OHS management system and contractor management system.	
4.2	KS to provide capacity building to its workers on OHS matters and ensure contractors are also providing capacity building on OHS to construction workers. Capacity building to be provided in line with EBRD guidance note on health, safety and security as well as briefing notes on safety related to specific works, available for KS and their contractors: How to implement EBRD performance requirements ( <a href="http://ebrd.com">ebrd.com</a> ) Safe working in confined spaces: <a href="#">English</a>   <a href="#">Russian</a> Briefing note BN01: Underground and overhead services_ <a href="#">English</a>   <a href="#">Russian</a> Briefing note BN02: Safe excavations_ <a href="#">English</a>   <a href="#">Russian</a> Briefing note BN03: Working safely around asbestos pipes_ <a href="#">English</a>   <a href="#">Russian</a> Briefing note BN04: Safe working with mobile plant_ <a href="#">English</a>   <a href="#">Russian</a> Briefing note BN05: Setting up a safe site_ <a href="#">English</a>   <a href="#">Russian</a>	Optimisation of worker health and safety	EBRD PR4, paragraphs 9	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	Capacity building plan and contractor requirements	

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4.3	At the corporate level (procurement), KS to develop (or enhance) and maintain a <b>traffic and transportation management plan</b> for its activities.  This plan can be used as a template guidance for contractors' development of project specific traffic management plans.	Optimisation of worker and community health and safety	EBRD PR4, paragraphs 30-31	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start as applicable	A traffic and transportation management plan developed for KS activities and referenced in the contractor management system.	
4.4	KS shall ensure that current <b>emergency preparedness and response</b> procedures are expanded to also cover <u>all its activities</u> .  Develop emergency response plan assessing potential impact from emergency situations involving third parties including local communities.	Community health and safety management	EBRD PR4 National emergency response regulation	Internal resources, external consultants Responsibility: KS	To be completed within the preparation of the ESMP for construction and operations phases.	Emergency response procedure targeting third parties and local communities is in place.	
<b>PR5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>						
5.1	KS to ensure that the land acquisition be implemented in accordance with the resolution dated April 5, 2023, and that a resolution for the plot #09-142-176-058 is obtained prior to construction.  Any other land acquisition, if required for the project, will be carried out through commercial transactions where possible.  If commercial transaction is not possible, then negotiated settlements need to be perused and the Company will develop and follow a project Land Acquisition and Livelihood Restoration procedure/Plan in compliance with EBRD PR5 assessing the impact and offering compensation based on full replacement value, targeted assistance, and livelihood restoration, including recognition of informal land users and informal property owners if affected.	Physical or economic displacement is avoided. Where impact is unavoidable, the land is acquired based on EBRD PR5.	EBRD PR5 National Land Code National Civil Code	Internal resources, external consultants Responsibility: KS	Prior any construction activities.	Land impact is avoided and where avoidance is not possible, the land is acquired via commercial transactions or via a process compliant with PR5.  If needed, Land Acquisition and Livelihood Restoration procedure/Plan is developed and implemented in line with PR5.	

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<b>PR6</b>		<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
6.1	Implement project level requirements as outlined in the ESMP. Carry out regular monitoring on site and status of the recipient River Sokyr during construction and operation.	Avoid negative impacts on flora and fauna and enhance habitats through rehabilitation of the existing sludge pond area, and hydrobiological conditions in the Sokyr river	EBRD PR6 National legislation	Internal resources, external consultants Responsibility: KS	Prior any construction activities, during construction and operation phases	ESMP requirements are included in construction contracts and implemented. Regular monitoring conducted and corrective actions developed as required.	
<b>PR7</b>	<b>Indigenous People</b>						
	No actions required.						
<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	Develop a Chance Finds Procedure covering, at a minimum: the legal framework for cultural heritage; the process to follow in the event of chance finds; roles and responsibilities for implementing the procedure and an induction for all workers, including project staff, contractors, and government agencies.	Any new construction activities involving ground-breaking works are implemented with cultural heritage mitigation measures in place.	EBRD PR8	Internal resources, external consultants Responsibility: KS	Prior any construction activities including prior site preparation.	Chance Finds Procedure is developed and applied on the project.	
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	Implement project SEP and do/keep regular SEP updates including external communication with relevant stakeholders.	Enabling KS to continue its communication activities, public consultations, and handling of grievances.	EBRD PR10, paragraph 9	Internal resources Responsibility: KS	Prior to start of the project.	Progress on SEP implementation.	

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10.2	At corporate level, KS to improve its registration of grievances, enabling the company to gain an overview of the total number of grievances received and the main areas/topics of these. The closure of grievances should also be registered, i.e., after solutions have been found and the complainant has been informed.	Putting KS in a better position to improve its services based on the main areas/topics of grievances received and to ensure that grievances are handled in a structured way.	EBRD PR10, paragraph 29	Internal resources, external consultants Responsibility: KS	To be completed in appropriate time for EBRD's evaluation prior to construction and operation start, as applicable.	Number and type of grievances reported to EBRD.  Process for receiving and handling of grievances documented.	