



**STAKEHOLDER ENGAGEMENT PLAN (SEP)**  
*Kokshetau 630 Beds Multidisciplinary  
Hospital*

FINAL

NOVEMBER 17, 2023

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## Abbreviations

Aol	Areas of Influence
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EP	Equator Principles
ESDD	Environmental and Social Due Diligence
ESMS	Environmental and Social Management System
GAP	Gender Action Plan
GBVH	Gender Based Violence and Harassment
IFC	International Finance Corporation
NGO	Non-Governmental Organization
PAP	Project Affected Persons
PR	Performance Requirement
PS	Performance Standard
SEP	Stakeholder Engagement Plan
SIA	Social Impact Assessment
SIP	Supplementary Information Package



## 1.0 Introduction

In cooperation with EBRD, the Ministry of Health of the Republic of Kazakhstan has developed a hospital modernization Program that envisages the development of 19 new hospitals to replace 40 outdated existing facilities and further increase bed capacity. The first phase of the Program involves the development of six new hospitals, including Kokshetau Hospital (“The Project”). Under the Program, the hospitals will be delivered as Public Private Partnerships (“PPP”) with Kokshetau being the pilot Hospital PPP Project.

The concession of the pilot project has been awarded to Renell Kokshetau LLP (“the Project Company”), which has a strong track record in delivering healthcare PPP investments. Construction period is planned to be completed in 2 years, and the concession period with Renell Kokshetau LLP will be a total of 7 years (2 years of construction and 5 years of operation). During the Operation period, the administration of the Hospital will be on the Industry Operator (or “TURAR”), which is established as a sub-institution of the Ministry of Health to act as the Non-Profit Joint Stock Company

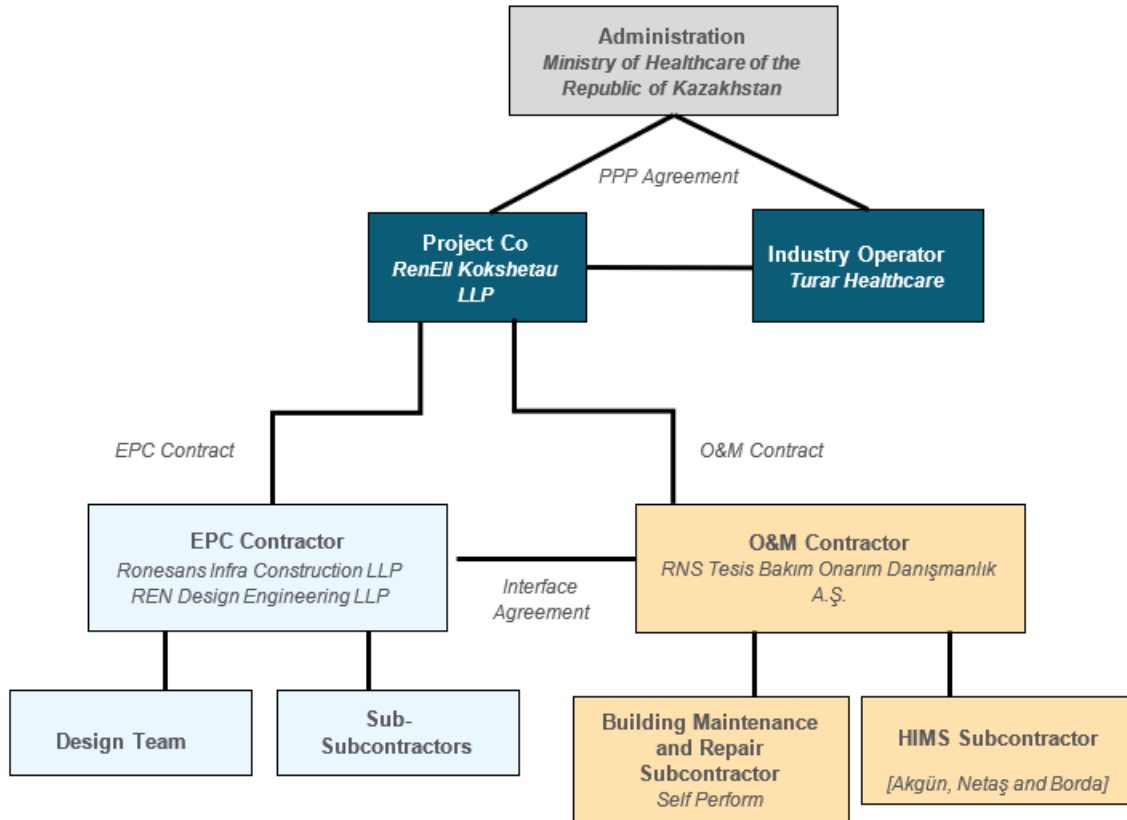
This Stakeholder Engagement Plan (“SEP”) is prepared for 630-bed Kokshetau Hospital in Kazakhstan for construction and operation phases in line with European Bank for Reconstruction and Development’s (“EBRD”), Performance Requirement 10 (“PR10”). This SEP identifies target groups and defines the type of engagement activities for each group of stakeholders during the pre-construction, construction, and operation phases.

This SEP will be reviewed by the Project Company (“Renell Kokshetau LLP”) during construction period and by the Industry Operator during Operation period at a minimum on an annual basis to meet the needs of local communities and other relevant stakeholders as listed in this SEP and to determine whether any changes or updates are required to SEP unless a more frequent update is necessary to reflect the Project phase activities, changing Project design, legislative and Environmental and Social Management System requirements.

## 2.0 Project Description

The Project is defined as the construction and operation of a multidisciplinary hospital located in the Saryarka microdistrict of the city of Kokshetau, Akmola region, Kazakhstan. The Project area, which was state land designated for city development, is rented for 1t years by the Project Company, which is planned to be used for 2 years for construction followed by object transfer to Industry Operator (TuRAR) for medical services management. Therefore, no land acquisition was carried out and no land acquisition is foreseen.

The Project Company will be responsible for constructing the Kokshetau Hospital. Therefore, during the construction period, the implementation responsibility of the Stakeholder Engagement Plan will be mainly on the Project Company together with the Ministry of Healthcare and TuRAR as the main stakeholders of the Project. The Project company will be responsible for two main services (building maintenance and repair & hospital information management system) only for 5 years in the operation period. Therefore, the implementation responsibility will be on TuRAR for the operation period. The organizational chart below shows the general overview of the responsibility sharing during construction and operation period.



**Figure 1 Organizational Structure of the Project**

TuRAR will have the overall authority on hospital management during construction. Therefore, SEP will be implemented and monitored by TuRAR during operation period.

The proposed location for the construction site of a multidisciplinary hospital is the Saryarka micro district of the city of Kokshetau, Akmola region. The Project named "Construction and operation of a multidisciplinary hospital for 630 beds in the city of Kokshetau" was established based on:

- Design requirements
- Engineering and geological surveys" findings at the facility
- Master plan of the construction site
- Project documentation developed by Creative Project LLP
- Architectural and planning requirement
- Relevant current local norms, specifications, instructions and other national legislative requirements for design and construction of such projects.

Architectural and planning solutions are developed considering the medical logistics, ensuring the flow of technological processes, the movement of patients (visitors, staff, waste, clean inventory, flows of finished forms of medicines from the centralized drug dilution unit).



According to the Law “On the approval of Hygienic Standards for Atmospheric Air in Urban and Rural Settlements, Order of the Minister of National Economy of the Republic of Kazakhstan dated February 28, 2015, No. 168” the assigned characteristics of the Project are:

- Building Responsibility Level - I
- Degree of fire resistance - I

**Figure 2 Layout of the Project**

- Constructive fire hazard class - C0

On the ground floor, adjacent to the main entrance, a dedicated area has been allocated for the convenience of daily patients. This zone will house various essential facilities, including an outpatient diagnostic department, maternity unit admission departments, oncology unit admission department, radiation diagnostics, a day hospital, endoscopy department, and angiography. The layout has been designed to ensure horizontal and vertical communication over short distances. Additionally, the ground floor will accommodate the emergency departments, planned to facilitate accessibility and connectivity with the departments of radiation diagnostics and operating rooms. This approach aims to optimize the overall operational efficiency and enhance the patient experience.

The second floor of the hospital primarily comprises intensive care units, maternity wards, pre-post-operative units, operating rooms, day operating rooms, and a day hospital. The layout of this floor is designed to connect departments that are directly and indirectly related to each other. Emphasis is placed on facilitating connections, particularly between the operating rooms, intensive care units, and the emergency department.

Moving on to the third floor, it is designated as a buffer floor between the lower and upper levels. The main purpose here is to ensure isolation, and thus, postpartum wards are planned on this floor.

From the fourth to the seventh floor, the hospital's inpatient wards are situated. Patients and staff can access these floors through internal elevators, and there are separate elevators for transporting garbage, food, and materials required for these floors. Technical and service rooms are located in the basement, which enables direct transport of medical materials and food to the respective floors. Additionally, the basement houses the radiotherapy department, equipped with one bunker for a linear accelerator, one bunker for brachytherapy, and a room for a CT simulator.

Elevator shaft walls in the hospital are selected as reinforced concrete. The overall master plan was carefully developed in compliance with space-planning arrangements, adhering to sanitary and fire safety standards relevant to the proposed development and utilities. The planned area's slopes are within permissible limits to ensure proper runoff of surface water from the building, facilitated by storm sewers.

The complex is designed to accommodate various buildings, including the hospital itself, a technical services building, a morgue and shelter building, an ambulance disinfection building, a security point, and a parking lot.

The parking lot breakdown is as follows:

- Closed Parking (for staff) -181 (including 17 disabled)
- Outdoor parking spaces (for patients and visitors) - 108 (including 14 disabled)
- Additional parking in garage building – 10 car spaces
- Emergency Area - 10 spaces

The above car parking breakdown resulting to the total number of car park spaces – 309. spaces.

### Project Location

Kokshetau, situated in northern Kazakhstan, serves as the capital of the Akmola region. Its strategic central location within the region enables it to function as a key healthcare hub, catering not only to the local population but also drawing patients from neighboring provinces within the Akmola Region and beyond.

The Project will cater to the healthcare needs of the Akmola Region, encompassing 10 cities, 17 districts, and 203 rural districts, with a total population of 733.8 thousand people, as reported by the Bureau of National Statistics of the Agency for Strategic Planning and Reforms of the Republic of Kazakhstan. For reference, Figures from 3 to 6 provide a regional map, displays the hospital's location, depicts Kokshetau city's position and offers a visual assessment of the current status of the Project land.



Figure 3 Regional Map



Figure 4 City Location



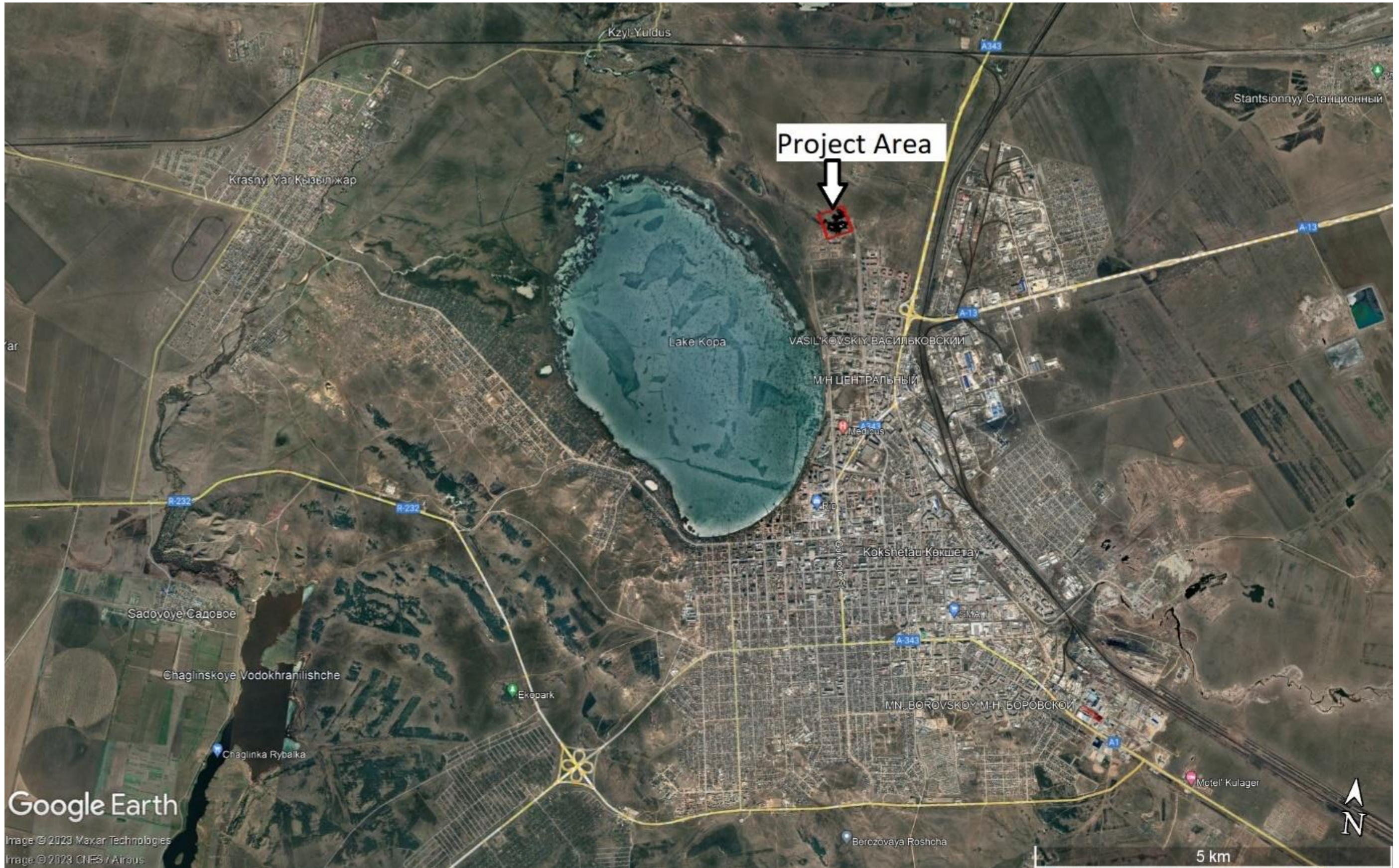


Figure 5 Project Area with respect to the City of Kokshetau





**Figure 6 Status of the Project Area with respect to the nearest residential complex**

In the comprehensive explanatory note, it was observed that the projected site is currently served by Gabdullina Street, a street of citywide significance, with a partially asphalt roadway along the eastern side. The construction of the street road network for the future project considers the existing network and aligns with the prospective planning structure of the area, following the decisions of the approved master plan.

Master plan of which the Project is also a part, details the 45-hectare (450,000 m<sup>2</sup>) land plot, including the location of the proposed Hospital (17 Hectares of the master plan of the region) and other land plots designated for various different functions. Notably, the selected land plot for the Hospital was designated as a territory for healthcare institutions in 2020 as part of the Program. The Akimat of the city of Kokshetau granted temporary use of the land plot to Project Company with specific instructions to ensure compliance with sanitary and epidemiological requirements for establishing a sanitary protection zone (as per the Project Agreement, which is the Agreement signed between the Project Company, the Ministry of Health -or “the Administration”- and the Industry Operator – of TURAR-, for the construction and operation of the Project).

RenEII Kokshetau LLP, as the recipient of the 17.0-hectare land plot (Cadastral No. 01-174-014-1892), commenced preliminary design works in full compliance with the instructions provided by the Akimat of the city of Kokshetau.

The Project area is located in a partly urbanized region with no industrial activity. The entire Project area is owned by the Akimat and rented to the Project Company for 10 years. There is currently no settlement activity in the project area, no agricultural activity, or any other economic activity within the Project area. The east, north and northern-west of the Project area is publicly owned meadow area covered by meadowy grass.

The surface of adjacent plots are flat.

There is no agricultural activity at adjacent plots.

The Project location has been determined and approved by the local administration which is the regional Akimat, in the City Master Plan. The master plan outlines the integrated development of the area, encompassing various functions such as residential buildings, kindergartens, shopping centers, entertainment facilities, sports complexes, and more. As per the master plan, the hospital's positioning will place it at the city center in Kokshetau, ensuring accessibility to the surrounding built environment.

The access routes from different parts of the country are available via highways, as summarized below:

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- from Astana (formerly Nur-Sultan) to Kokshetau,
- from Shchuchinsk to Kokshetau, and
- from the outskirts of the city via the highway to the construction site.

The current and future access to the land plot and the hospital will be achieved through Gabdullina Street as shown below.



**Figure 7 Access Route and Bus Stops to Project Area from Kokshetau City Center**

Gabdullina Street ends where the Project area is located, and the last stop for the buses is located there. Also, there are several bus lines coming from different parts of Kokshetau to those bus stops, indicating that the public transportation is currently available to the Saryarka Microdistrict where the Project area is located. The transport infrastructure of the construction area is well developed. The route has a convenient road access, connected with city roads. Therefore, there is no need for additional temporary access roads. There is access to the Project site from the adjacent land plots and the Project Area does not have a negative impact on the accessibility among the plots.

There is Lake Kopa 900 meters away to the east of the Project as a water resource.

### 3.0 Requirements on Stakeholder Engagement

All activities and implementations within the scope of the Project shall comply with relevant standards during construction and operation. These are as follows;

- Commitments made and the requirements of relevant laws and regulations in accordance with relevant subsidiaries and institutions of Ministries of Kazakhstan Republic,
- International Standards (EBRD PR10, IFC PS1, EP5,); and,
- All policies and standard operation procedures of the Project's Management Systems through construction and operation phases.

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### 3.1 Applicable National Law

The environmental and social protection in Kazakhstan is regulated by various types of legislations, including the Constitution, Constitutional Laws, Codes, Presidential Decrees, Orders, Requirements, Sanitary Hygienic Norms and Rules, Research Documentation, Recommendations, Methodologies, and other normative acts as listed below in Table 1.

**Table 1. Environmental, Social, Labor, Health and Safety, Construction and Other Related Legislation Relevant to the Project**

Legislation No.	Full name
<b>Environmental and Social</b>	
No. 212	The Environmental Code of the Republic of Kazakhstan dated January 9, 2007 No. 212
No. 477.	The Forest Code of the Republic of Kazakhstan (as amended and supplemented as of May 24, 2018)
No. 481	Water Code of the Republic of Kazakhstan of July 9, 2003 No. 481
No: 175	The Law of the Republic of Kazakhstan on Specially Protected Natural Areas
No. 125-VI	The Code of the Republic of Kazakhstan on Subsoil and Subsoil Use
No. 1488 – XII	The Law of the Republic of Kazakhstan on Protection and Use of the Objects of Historical - Cultural Heritage dated 2 July 1992, No. 1488 – XII
No.239	Sanitary and epidemiological requirements for the implementation of industrial control (approved by Order of the Minister of National Economy of the Republic of Kazakhstan dated June 6, 2016 No.239.
<b>Labor and Occupational Health &amp; Safety</b>	
No. 414	Labor Code dated November 23, 2015 No. 414-V ZRK
No.128	Rules for conducting the compulsory medical examinations, as amended on 11/23/2016. Approved by acting Minister of National Economy of the Republic of Kazakhstan dated February 24, 2015 No.128
No.439	General fire safety requirements approved by Order of the Minister of Internal Affairs of the Republic of Kazakhstan dated June 23, 2017 No.439
No.1077	Fire Safety Rules (approved by decree of the Government of the Republic of Kazakhstan dated 09.10.2014, No.1077);
<b>Construction and Other</b>	
No.242-II	The Law of the Republic of Kazakhstan dated July 16, 2001 No.242-II on Architectural, Urban Planning and Construction Activities in the Republic of Kazakhstan
No 148.	The Legislation of the Republic of Kazakhstan on local public government and self-government dated 23 January, 2001 No 148.

The Information disclosure and Stakeholder Engagement activities are required to be performed during EIA studies only, according to national legislation. However, the stakeholder engagement should be continuous throughout the lifecycle of the Project according to EBRD standards. Also, EBRD standards highlight “meaningful consultation”. In other words, significant consultation will be conducted by the Company when employees or communities facing potential substantial risks or negative effects from the project are involved at all stages actively and provided with meaningful feedback/solutions. This consultation will provide stakeholders with the chance to voice their opinions regarding project risks, impacts, and ways to address them. The Project Company or the Administration (Industry Operator-TuRAR) will carefully consider and respond to these input. Another difference between national and international approach is the grievance mechanism. National law does not have an established and continuous grievance mechanism at the Project level whereas it is a requirement under PR2/10 and PS1/2.

Having summarized the main gaps between the national and international law, below is a summary of how public hearings should be performed in accordance with national law within the scope of EIA studies.

The Environmental Code of Kazakhstan outlines requirements concerning Public Consultation and Information Disclosure as follows:

**Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information**



According to national legislation, the public must be informed about a project and have the opportunity to provide feedback during its development or discussion. This is based on the 2007 Environmental Code of the Republic of Kazakhstan and subsequent amendments (Article 57, Law No 126-VI, 27 December 2017).

The key points include:

- All interested individuals and public associations can express their opinions during the state environmental expert review process.
- Public hearings are required for projects that can directly impact the environment and human health.
- Public hearings are also necessary for Environmental protection action plans developed for Category I and II facilities for emission permits.
- The process for public hearings, including stakeholder identification, consultation methods, and duration, will be determined by the environmental protection authority.
- Following the state environmental review, stakeholders can access information in compliance with the Environmental Code.

According to Article 163 of the Environmental Code, environmental information is generally public unless other laws dictate otherwise. Specific data and materials are available through information requests from individuals and legal entities, media distribution, and accessible communication channels.

Under the Instruction on environmental impact assessments for proposed activities, customers are responsible for:

- Providing information to and involving the interested public throughout the environmental impact assessment (EIA) process.
- Giving the interested public access to EIA materials.

Public hearings are the primary method for collecting public opinions, covering results of Preliminary EIA and EIA for activities with significant environmental and health impacts.

Rules of Public Hearings (Order No 135, 7 May 2007, as amended on 8 September 2017, by the Minister of Environmental Protection) dictate that public hearings are held for projects affecting the environment and human health, as well as draft environmental protection action plans. Participants include interested public, organizations, local authorities, and the media.

Initiators of economic activities must arrange public hearings and inform local authorities of the date and venue, publishing announcements in the media 20 days in advance. Local authorities provide access to EIA materials.

During the hearings, any participant can voice opinions and ask questions, and the results are documented in minutes. The customer and EIA developer can incorporate public feedback into the project.

The Project Company is responsible for funding, technical support, and information needed for public hearings.

This procedure has been carried out within the scope of the EIA studies which have been summarized in Section 6.1 of this Plan.

## 3.2 International Requirements

### EBRD Requirements<sup>1</sup>

The Project was categorized as “Category B” since the Project has potential limited adverse environmental or social risks and/or impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures.

Category B is defined as projects where potential, adverse, future environmental and social impacts are typically site specific and/or easily identified and addressed through mitigation measures.

The key requirements regarding the stakeholder engagement are laid out in the EBRD PR10, as described below.

**Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information**

<sup>1</sup> <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>



All projects financed by EBRD shall be structured to meet the EBRD [Environmental and Social Policy](#) requirements, including 10 Performance Requirements (PRs) for key areas of environmental and social sustainability that projects must meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's [Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental, and public disclosure issues raised by Project-affected people and civil society organizations about EBRD-financed projects among Project stakeholders or to determine whether the EBRD has complied with its ESP and the Project-specific provisions of its [Access to Information Policy](#); and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the EBRD.

The EBRD's requirements and standards concerning the stakeholder engagement process can be briefly summarized as follows:

- The EBRD's policies regard stakeholder engagement as central to building strong, constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts.
- Stakeholder engagement is an inclusive and on-going process which is most effective when initiated at an early stage of the project and is an integral part of the assessment, management and monitoring of environmental and social risks and impacts of the Project.
- Stakeholder engagement involves the following elements:
  - Stakeholder identification and analysis,
  - Stakeholder engagement planning,
  - Disclosure of information,
  - Meaningful consultation,
  - Implementation of a grievance mechanism, and
  - Ongoing reporting to relevant stakeholders.
- Stakeholder engagement should be conducted to provide stakeholders with access to timely, relevant, understandable, and accessible information in a meaningful, effective, inclusive, and culturally appropriate manner and free from manipulation, interference, coercion, intimidation, and retaliation.
- Stakeholder engagement will begin as early as possible in the project development and will continue throughout the project life cycle. The nature and frequency of stakeholder engagement at all phases of the project development will be proportionate to the nature and scale of the project, its potential adverse environmental or social risks and impacts, and the level of stakeholder interest.
- The Project should identify and document the various individuals or groups who (i) are affected or likely to be affected (directly or indirectly) by the project (affected parties), or (ii) may have an interest in the project (other interested parties).
- The Project should define clear roles, responsibilities and authority and designate specific personnel to be responsible for implementing and monitoring stakeholder engagement activities.
- A mandatory requirement is establishing an effective grievance mechanism to facilitate prevention and/or timely resolution of conflicts that may arise.

Considering the social impacts of the Project, the Project needs to establish an in-depth consultation process that will ensure transparent engagement means and effective grievance mechanism.

Project will undertake a process of consultation in a manner that provides the Affected Communities with opportunities to express their opinions about project risks, impacts and mitigation measures, and allows the client to consider and respond to them.

Effective consultation is a two-way process that should: (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise; (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily



accessible information which is in a culturally appropriate local language(s) and format which makes it understandable to Affected Communities; (iii) focus inclusive engagement on those directly affected as opposed to those that are not directly affected; (iv) be free of external manipulation, interference, coercion, or intimidation; (v) enable meaningful participation, where applicable; and (vi) be documented. The Project will tailor its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups. If clients have already engaged in such a process, they will provide adequate documented evidence of such engagement.

## 4.0 Objective and Application of SEP

This SEP applies to the entire Project including construction and operation phases. SEP is a living, easily adaptable document that will be revised and updated during the Project life to incorporate additional updates on the Project.

The objective of SEP is to identify all stakeholders and their potential interest in the Project and define principles to be applied during the engagement with the stakeholders of the Project.

This plan ultimately aims to:

- Identify all stakeholders (directly, indirectly impacted, and other interested parties), the degree of the impacts they will encounter due to Project activities, and their potential interest in the Project.
- Describe effective engagement methods and activities by defining their purpose and frequency.
- Provide means for effective and inclusive engagement with Project affected parties that will inform project design and implementation.
- Define roles and responsibilities for the implementation of this Plan.
- Describe the effective engagement methods.
- Establish long-term relations with local communities on the basis of mutual trust and transparency.
- Make sure that stakeholders have access to relevant information on the Project.
- Define a grievance mechanism for the Project.
- Define monitoring and reporting requirements for the effective implementation of the SEP.

## 5.0 Stakeholder Identification and Analysis

Stakeholders of the Project are classified into internal (working for the Project or its key contractors, directly involved in and benefitting from the Project) and external (not working for the Project and not involved in the Project).

External stakeholders are classified into: Affected communities (such as the inhabitants of the Project impact area) and other stakeholders such as, future patients and visitors of the Hospital, governmental, and non-governmental organizations, employees and the communities that are not affected/partially affected by the Project.

The categories of stakeholders / affected communities are presented below.

### 5.1 Affected Communities (Area of Direct Influence)

Kokshetau, where the project will take place, is a city in the north of Kazakhstan and is the capital of the Akmola region.

The stakeholders residing in the vicinity of the Project area will be directly affected by potential visual impacts (both during construction and operation), noise disturbances (primarily during the construction phase), livelihood changes, and traffic implications (both during construction and operation).

Directly Impacted Project Stakeholders due to Traffic, Livelihood, Noise and Visual Impacts are as follows:

- Residents of the city close to the Project area (traffic, livelihood, noise, visual impacts)
- Businesses in the city close to the Project area (livelihood impacts)
- People living in the neighborhood of the existing regional hospital (livelihood impacts)
- Patients and patient visitors during operation
- Farmer that herds horses in the project area (traffic, livelihood, noise and visual impacts)

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- Communities affected by traffic in settlements close to the Project area and the Material Transport Routes (traffic)
- Vulnerable groups i.e. hearing impaired community living in Saryarka Microdistrict (traffic, livelihood, noise, visual)

## 5.2 Other Stakeholders (Area of Indirect Influence)

Other stakeholders are represented below.

### a. State agencies and relevant authorities

#### i. Local State agencies and relevant authorities

- Akimat of the city of Kokshetau
- Department of Housing and Communal Services, Passenger Transport and Roads of Kokshetau
- Department of Land Relations, Architecture and Urban Planning of Kokshetau
- Department of Employment, Social Programmes and Civil Registration of Kokshetau
- State Communal Enterprise on the Right of Economic Management "Multidisciplinary regional hospital" under the Health Department of Akmola region

### b. Non-governmental Organizations, Non-civil Organizations and Individuals

- Association of Legal Entities "Union of Persons with Disabilities of Akmola region"
- NGO "Amansauyk" (human rights organisation specialised on healthcare rights)
- Association of business women in the North Kazakhstan region
- Public Association "Women's Support Center"
- ECHO Public Association NGO (working on involvement of citizens in process of decision making on all levels of government)
- Public fund «Kazakhstan Innovations» (The Foundation is the Aarhus Centre of Akmola region on environmental protection, public access to justice and introduction of new technologies, as well as a member of the Council on Ecology of Akmola region under the Department of Natural Resources and Regulation of Nature Management of Akmola region.)
- Public Association "Ecological Centre "Eco-Kokshe" (Creation of environmental monitoring in the region especially on the Lake Kopa)

### c. Media and Press

National and local media and press (print, audio-visual and internet media)

### d. Employees

- Project Company's workers
- EPC-contractor workers
- Sub-contractor workers
- Industry Operator's staff & workers
- Operation phase workers
- Medical staff that will/might be relocated from the existing regional hospital

### e. Local Business

- "Arsha" LLP (grocery shop and pharmacy) located next to existing regional hospital
- "Berket" grocery shop located next to existing regional hospital
- "Buffet" next to hospital building





There are three other businesses namely as “Eko”, “Amina” and “Visa” shops which are less likely to be impacted as they are not as close to the existing regional hospital as the ones listed above. Also there are two restaurants nearby. Other businesses will/may be identified during the construction phase of the Project.

Moreover, currently there is no livelihood impact foreseen for the construction period. However, there might be a livelihood impact on the local businesses operating around the existing regional hospital, in case the hospital building will be permanently closed. If that will be the case, there will be additional study on the impact on livelihoods for the identified local businesses, a more detailed scoping study will be required; and a Livelihood Restoration Framework might be obligatory to be developed. This issue is reflected in the ESAP of the Project for the pre-operation period.

The businesses that might be impacted from traffic is not foreseen at this stage as the already existing main roads will be used for material transport during the construction and operation period.

#### **f. Worker Unions**

Several Worker unions might get involved as stakeholders especially during construction for construction workers, and during operation period hospital workers. Below two unions are the ones that existing regional hospital workers are a member of.

- Akniet Union (regional hospital workers’ union – about 300 workers from regional hospital)
- Senim Worker Union (regional hospital workers union – about 1000 workers from regional hospital)
- Republican Public Association "Yntymak" Kazakhstan sectoral labor union of workers of medium and small businesses. (It is not a labor union in the construction industry, but it actively raises issues of labor rights and protection for construction workers.)

Other unions will/may be identified during the construction.

#### **g. Vulnerable People**

The Project is not expected to trigger any Project-induced vulnerabilities. However, it is acknowledged that vulnerable individuals may exist within low-income groups, the young, elderly, disabled, and migrant populations. The Project’s design ensures that it will not exacerbate their vulnerability.

There are traffic related mitigation measures identified in the Environmental and Social Due Diligence Report (“ESDD”) of the Project to ensure safety of nearby hearing-impaired community in terms of increased traffic around the Project area; and the design solutions for the operation period to ensure accessibility of the disabled.

Also, the engagement with the hearing-impaired community will be of great importance as they are living close-by the Project Area and a part of the main stakeholders “the saryarka microdistrict”, the Public Consultations shall be accessible to the group with supported communication methods, such as sign language interpreters during public consultations, written form of the presentations to be distributed to the group for the Project information and other relevant measures as convenient, to facilitate engagement with this community.

Moreover, the Project does not cause any livelihood impacts. Consequently, specific livelihood provisions are not targeted, given the absence of adverse effects on the communities’ livelihoods.

## **6.0 Stakeholder Engagement to Date**

### **6.1 EIA Permitting Phase Engagements**

The Project EIA states that information about holding public hearings is mandated to be disclosed in the national and Russian languages in the following ways:

1) on the Unified Ecological Portal (EIA disclosed in the website during disclosure process and then removed)

2) on the official Internet resource of the local executive body (regions, cities of republican significance, the capital) or the official Internet resource of the state developer body:

Internet link: <https://www.gov.kz/memleket/entities/aqmola-upr/documents/details/215738?lang=ru> date of publication: 09/23/2021 on the official Internet portal of the State Institution "Department of Natural Resources and Environmental Management in Akmola Region"

Moreover, project EIA document is published by the Department of Natural Resources and Environmental



Management in Akmola Region on above website and became publicly available from September 23, 2021 - 14:01 together with Non-Technical Project Summary and design considerations.

3) There was also a session of in-person Public Hearing during the time of EIA studies on October 29, 2021 at a meeting room in the Regional Hospital. The hearing was on the contents of the EIA report.

Before the public hearing, the information has been disseminated through media channels, such as newspapers, television, and radio. This communication took place twenty working days prior to the scheduled date of the public hearings of the Project. Specifically, the newspaper "Risk-Business" published on September 23, 2021 (issue No. 38, page 1484) included the scanned front page and the page containing the announcement of the hearing. Additionally, the announcement has been revealed on the "Telemarket" segment of the Kokshe channel, which belongs to the Akmola regional branch of JSC "Republican television and radio corporation, Kazakhstan". The announcement has taken place from September 22, 2021, to September 24, 2021. Also, in the Akmolinskaya region, Kokshetau G.A., Kokshetau, on Rakhimbek Sabataev Street, there was two announcements displayed on the information board in the central hall of the regional hospital, where the hearing took place. The hearing has been carried out by the participation of representatives from the Admisitration, the Project Company, the "Creative Project KZ" design company and IP "Tabys" the EIA Consultancy Company, the Regional Hospital and with the participation of 7 community members / citizens who are interested in the Project. The list of public hearing participants are given in Annex-4 of this Plan. A minutes of meeting signed by the participants has been provided in the EIA report of the Project.

No other in-person engagement has been performed after EIA Public Participation Meeting, beside informal / unrecorded and undocumented continuous communication between the Akimat and the Project Company.

## 6.2 Impact Identification Site Visit

A site visit for ESDD and SEP has been carried out between 26-28 May, 2023 by the local partner (EcoSocioAnalysts LLP) of the consultant (BTY) and the representative of the Project Company. The main focus of the site visit was to understand the current status of the Project area and its vicinity, in terms of environmental and social aspects. The team focused on gathering information on the impacts on biodiversity, contaminated sites, important surface water resources, access to and from the Project site, utilities, nearby community, settlements, relevant governmental authorities (Akimat).

It is understood that the land is not a forestry or agricultural land. There are no archeological protected areas nearby. According to the relevant correspondences between relevant Akimat Departments and the Project Company, it is noted that there are also no animal burials at Project site, and the Project location is outside the territory of the water protection zone (which is 500 meter from the water body) with Project location being 900 meter distant from the Kopa Lake.

A total of 29 people were interviewed during the site visit and meetings were held with local executive bodies, the main stakeholder groups identified were: local authorities, residents of the Saryarka Microdistrict located at the new hospital site, residents and businesses located near the current regional hospital and the local and country NGOs.

**Table 2 Stakeholders that were Interviewed during the Assessment**

Stakeholder Type	Organization	Contact Person <sup>2</sup>	Interaction Form
Local executive authorities	Akimat of the city of Kokshetau	Deputy Akim of Kokshetau for Housing and Communal Services and Landscaping	Personal meeting
	State Institution "Department of Housing and Communal Services, Passenger Transport and Roads of Kokshetau"	Head of Department	Personal meeting

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<sup>2</sup> The names are intentionally abbreviated to initials to protect personal data.

Stakeholder Type	Organization	Contact Person <sup>2</sup>	Interaction Form
	State Institution "Department of Land Relations, Architecture and Urban Planning of Kokshetau"	Acting Head of Department Head of the Architecture Sector	Personal meeting
	State Institution "Department of Employment, Social Programmes and Civil Registration of Kokshetau"	Head of Department	Telephone call
Health care facilities	State Communal Enterprise on the Right of Economic Management "Multidisciplinary regional hospital" under the Health Department of Akmola region	Inspector of the Division of Customs Procedures of the Department of Organization of Customs Control; Head of Nursing Staff Management; Head of Human Resources Department.	Personal meeting
Hospital patients	A random patient	No name asked	Personal meeting
NGOs	Association of Legal Entities "Union of Persons with Disabilities of Akmola region "Birlik"	Chairman	Personal meeting, questionnaire
Local Business	"Arsha" LLP (grocery shop and pharmacy) Baiken Ashimov, 2a	Head	
	"Berket" grocery shop Rahimbek Sabataev, 1a	Seller	
Residents of the city	Passerby	Medical college student Askar	Personal meeting
	A visitor to the "Berket" grocery shop	I. T.	
	People living in the neighbourhood of the existing regional hospital	D.	
	People living in the neighbourhood of the existing regional hospital	M.	
	Saryarka microdistrict, 14/3	A.K.A.	Personal meeting, questionnaire
	Kokshe Su, 1a	D.	
	Kokshe Su, 1	H.R.D.	
	Saryarka microdistrict, 32	B.A.Z. - House Leader R.A.T.	

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Stakeholder Type	Organization	Contact Person <sup>2</sup>	Interaction Form
	Saryarka microdistrict, 32a	Z.S.K. - House Manager	
		T.N.N.	
	Saryarka microdistrict, 8/4	T.S.K. - House Leader	
		T.K.S.	
	Saryarka microdistrict,8/3	Z. S. - House Leader	
	Saryarka microdistrict,9/8	A.S.A. - House Leader	
	Saryarka microdistrict, 6/3	M.K.M. - House Leader	
		I.A.P.	
		A.E.R.	
	Saryarka microdistrict, 32	E.S.M.	
Saryarka microdistrict, 14/4	A. - House Leader		

### 7.2.1. Stakeholder Feedback during the Impact Identification Consultations

Based on interviews conducted with residents and businesses surrounding the existing regional hospital, it was suggested that the changes related to the opening of the new hospital are not perceived to be significant. However, casual passers-by expressed various opinions, with some asserting that building a new hospital was unnecessary altogether. On the other hand, patients and residents alike acknowledged the already high level of professionalism exhibited by the regional hospital staff.

Furthermore, some respondents highlighted concerns about inconveniences for medical staff and students due to the new hospital's remote location from Kokshetau Higher Medical College, Kokshetau State University, and the medical students' dormitories. Additional concerns were raised regarding possible bed idle time and the potentially high maintenance costs of the new hospital.

Conversely, others believed that a modern hospital would attract and retain qualified medical staff, thereby enhancing the quality of medical services provided.

The head of the NGO, that advises and helps the disabled people about livelihood improvement through finding employment and arranging social activities, has considered the project to be socially important and necessary for the development of the region as a whole. He suggested to focus on the hospital accessibility for people with limited mobility by providing wide passages, public transport from all parts of the city and a level platform at the hospital stop. He also suggested the hospital operator to set up a quota for employment of persons with disabilities (e.g. hearing impaired).

A local farmer herds 15-20 horses 1km from the hospital site. The economic activity is to herd horses for horse meat. The adjacent land is actively used by the farmer as a meadow for his horses. There is no other users of those plots.

During the interview, he stated that 2.85 ha of the meadowy grass area (total of the area he uses is 240 ha) that he is using is now rented to the Project Company by the Administration. However, he does not object to this process as he was stating that the meadow is big enough for him to continue his economic activity. It is worth noting that, his farm is located on the State Reserve land designated by the City General Plan for urban construction. The structures on this land on the other hand, is registered on his name and he has the ownership of the farm structures, in accordance with the land verification records by the website of Office of the Land Cadastre and Automated Information System of the State Land Cadastre ([www.aisgzk.kz](http://www.aisgzk.kz)).

However, he did express concern regarding another matter. The farmer believes that the hospital will add further strain to the already overburdened city utilities. Specifically, he emphasized the necessity for modernizing the



wastewater treatment plant, as without this improvement, foul odors from the plant might affect the well-being of hospital patients.

This concern has been raised by the consultant in the Environmental and Social Due Diligence.

The wastewater treatment plant (WWTP) near the project area has a capacity of 32,000 m<sup>3</sup>/day, as learnt by the engagement with Akimat. The construction will add 390 m<sup>3</sup>/day at peak, a 1.2% increase in load, and the hospital's daily contributions during operation are even lower at 0.13% and 0.07% for the base and designed cases respectively. While there's no detailed analysis on the plant's capacity with the added load, an article from December 2022 highlighted the need for nationwide sewage system upgrades, including the Kokshetau WWTP, with plans for modernization starting in 2024 due to aging infrastructure. Although the Project activities won't heavily strain the system, national recognition of the issue signals upcoming improvements in the existing situation in terms of sewage system and wastewater treatment problems raised by the stakeholders interviewed.

## 7.0 Stakeholder Engagement Methods and Programme

### 7.1 Stakeholder Analysis and Engagement Programme

The stakeholder analysis presented in this Plan is based on publicly available information sources. The information on stakeholders should be amended and updated as the Plan progresses.

The key stakeholders identified as a result of the analysis are listed in Table 3 together with a summarized indication of their project specific interest in the Project at the end of this section. It is crucial to engage with the components of the City Council, as well as the Environment and Women's Platforms, along with the branches of national civil society organizations. This engagement should be conducted without making any distinction, and efforts should be made to mobilize voluntary participation.

Stakeholder engagement is an ongoing activity that spans both the construction and operation phases of the project. The following program outlines the essential planned stakeholder engagement activities to be carried out during these phases. It will undergo periodic reviews throughout the construction phase and annual reviews during the operation phase. The implementation responsibility of the Environmental and Social Management System of the Project will be on the Project Company and the EPC-Contractor together with the subcontractors during construction period; and will be on the Industry Operator during operation period. The purpose of these reviews is to ensure the continued relevance of the program and its alignment with the needs of the Project Company, Industry Operator, local communities, and other relevant stakeholders as identified in this SEP.

### 7.2 Stakeholder Identification and Engagement Methods

The identified stakeholders with potential interest and concerns regarding the Project are summarized below. The Project Company and the Industry Operator will employ various stakeholder engagement tools and methodologies for an effective stakeholder engagement. Key methods and tools which will be primarily used for engaging different stakeholder groups are also shown in the following table.

**Table 3 The identified stakeholders with potential interest area**

Stakeholder group	Interest Area	Engagement and information disclosure methods
Local communities, Community Members	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation Measures, Available Studies and Assessments.	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media
Local Business (grocery shop and pharmacy grocery shop)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts of the project, livelihood impacts	Leaflets, Brochures, Dialogue and engagement meetings, Company website, Community Grievance Mechanism, Press, Media & social media, in-depth consultation, face to face interviews

Stakeholder group	Interest Area	Engagement and information disclosure methods
Project workforce/ subcontractors/Worker Unions/ Medical staff that will/might be relocated	Working conditions	Face to face interview, Trainings, Employee Grievance Mechanism
Local/ Regional Authorities	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments, traffic impacts.	Official meetings, dialogue and engagement meetings, worksite visits
NGOs and academics/experts	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments.	Dialogue and engagement meetings, Regular reports through website, Posters/Leaflets published on the website, Media & Press statements, Grievance Mechanism on the website
Business and Industry Chambers, Unions & Associations	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments.	Close one to one engagement, Thematic / sectoral roundtable meetings
Media and Press	Interviews, press releases, web site	Interviews, press releases, web site
Vulnerable Groups (women, children, disabled people, minorities.)	General Project Information, Schedule, Economic Impact, Environmental and Social Impacts, Proposed Mitigation measures, Available Studies and Assessments. Specifically: Construction nuisances including noise, visual impacts, noise impacts.	Dialogue and engagement meetings with the organizations owned by vulnerable groups, advocate and protective organizations, Akimat in Kokshetau. Focus group discussions with vulnerable groups residing in Saryarka Microdistrict and targeted meetings.

## 7.3 Information Disclosure

Reliable and complete Project information will be presented to stakeholders in a manner that considers specific local conditions, cultural and language preferences of the local communities.

To effectively disclose relevant information with different stakeholder groups, the following documents will be published at the Project Company's and Industry Operator's website and in the Project Company's office and the Industry Operator's office as a paper copy:

- Non-technical summary (in Kazakh Russian and English)
- This Stakeholder Engagement Plan (in Kazakh Russian and English)
- Posters, Booklets, Leaflet and similar materials (in Kazakh Russian and English)

The international community will also be able to have access to the English versions of these documents from the Project Company website.

### Information Disclosure Methods

To inform the public about upcoming public hearings, the information will be disseminated through various mass media channels, such as newspapers, television, and radio. At least one newspaper, along with a television or





radio channel available in the region, will be utilized. This communication will take place no later than twenty working days prior to the scheduled date of the public hearings of the Project. Specifically, the

#### Internet/Web Site

Project Company will keep updated project information regularly (quarterly) on the Project website or when a milestone is reached or where relevant. Grievance mechanism will also be disclosed on the web-site together with grievance form, description of grievance mechanism and timely feedback, during the construction period. Same will be valid for the Industry Operator during operation period.

#### Public Media

Project information will be supplied to public media through appropriate means such as interviews, press releases and website/social media updates. These activities will be coordinated with Communication Department of the Project Company during construction period and the Industry Operator during operation period.

#### Publications for people

Project Company will give full and timely responses to comments, complaints and questions of local communities and civil society organizations following grievance management procedure during the construction period. The comments, complaints and questions will be logged, processed / distributed to relevant departments, and response/feedback will be sent back to the applicant timely. For less digitally savvy community members a call center or written application via information desks/ kiosks will be enabled.

Project Company will generally disclose the necessary information through the materials such as booklets, leaflets, posters, and similar materials providing information about different stages of the Project. The same will be valid for the Industry Operator during operation period as they will have the implementation responsibility of the ESMS after construction.

## **7.4 Gender**

Gender equality will be considered during the implementation of the SEP, which has a participatory and inclusive approach. Project Company and the Industry operator will take the following measures in line with gender equality principle:

- Disaggregating all data obtained and recorded during the Project lifecycle based on gender
- Gender impact monitoring during the Project construction and operation periods (local employment, local businesses etc.)
- Internal grievance mechanism accessible and confidential for female employees of the Project Company, EPC-contractor and sub-contractors in the Project to prevent gender-based violence and harassment; and the same mechanism will be applied during the operation period by the Industry Operator,
- Keeping internal and external grievance records by gender
- Analyzing and monitoring the effectiveness of stakeholder engagement methods, especially in terms of the participation of women stakeholders who are among vulnerable groups
- Trained staff should also be available to manage Gender Based Violence and Harassment (“GBVH”) cases safely and with due care.

#### **Gender Action Plan**

A Gender Action Plan (“GAP”) has been prepared to ensure that women participate in equally and benefit from all components of the project. The objective of the Gender Action Plan is;

- To give visibility to and accountability for gender mainstreaming,
- To provide a road map for project implementation, monitoring, and evaluation,
- To include quotas, targets, activities, and design features to address gender-equality issues,
- To facilitate women’s involvement, participation in, and tangible benefits from the project,
- To ensure gender-inclusive design and implementation of projects.



A GBVH Policy will be prepared by the Project Company including a GBVH procedure with clear responsibilities shared by the competent/trained staff, and a GBVH focal person will be assigned, as also evaluated in the ESDD of the Project.



## 8.0 Stakeholder Engagement Plan

**Table 4: External Stakeholder Engagement during Pre-construction<sup>3</sup>, Construction, Operation Phases of the Project<sup>4</sup>**

Target Group	Information to be shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
All stakeholders	Project Information on design, schedule, environmental and social impacts of the project construction, commissioning and operation, recruitment and procurement strategies of Project Grievance Mechanism Management of environmental and social risks of the Project	<b>Pre-Construction/ Construction</b>	Public Consultation Meeting Posters Brochures Annual reports Information Desk Community meetings Company website Grievance tool on the website / call center / written application mechanism Media (press, tv and social media)	Before construction starts, During Construction, Continuously /When Needed/When Requested
All stakeholders	Commissioning and operation, recruitment and procurement strategies of Project Grievance Mechanism Management of environmental and social risks of the Project	<b>Operation</b>	Posters Brochures Annual reports Information Desk Community meetings Company website Grievance tool on the website / call center / written application mechanism Media (press, tv and social media) Media	Before operation starts, During Operation, Continuously/When Needed/When Requested
Related Public Institutions All employees and contractors	Staff training and awareness, Engagement activities Implementation of the mitigations	<b>Pre-Construction/ Construction/ Operation</b>	Posters Brochures Annual reports Company website Meetings Grievance tool on the website / call center / written application	Continuously/When Needed/When Requested

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<sup>3</sup> The period between the disclosure and start of construction.

<sup>4</sup> Any formal meetings will be advertised at least 10 days in advance and held at times convenient for stakeholders to attend.

Target Group	Information to be shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
			mechanism	
Local communities and local businesses	Possible restrictions of construction and operating activities on roads Social projects	<b>Pre-Construction/ Construction</b>	Grievance tool on the website / call center / written application mechanism Thematic focus group meeting	Quarterly meeting Continuously/When Needed/When Requested
	Possible restrictions of construction and operating activities on roads Social projects	<b>Operation</b>	Grievance tool on the website / call center / written application mechanism Thematic focus group meeting	Annual meeting Continuously /When Needed/When Requested
Local businesses	Nuisance caused by construction activities (noise, dust, traffic, pasture access for local farmer)	<b>Pre-Construction/ Construction</b>	In-depth interviews Grievance tool on the website / call center / written application mechanism	Monthly meetings Continuously/When Needed/When Requested
	Nuisance caused by operation activities (noise, traffic, pasture access for local farmer)	<b>Operation</b>		Six monthly meetings Continuously /When Needed/When Requested
Patients and Patient Visitors Wider communities in Kokshetau in districts with vulnerable populations, the village / civil society and local stakeholders as a result of stakeholder mapping	Environmental, urban and social impact Social projects	<b>Pre-Construction/ Construction</b>	In-depth interviews Dialogue and engagement meetings Grievance tool on the website / call center / written application mechanism	Quarterly meetings Continuously/When Needed/When Requested
		<b>Operation</b>		Annual meetings Continuously /When Needed/When Requested
Business and Industry Unions (may have an	Business collaborations Local Employment and Procurement Plan	<b>Pre-Construction/ Construction</b>	Governmental and non-governmental commerce organization meetings, industrial	Semiannual meetings

Target Group	Information to be shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
interest in the project (other interested parties))			activities, specific meetings, supplier development programs	When Needed/When Requested During Construction
	Business collaborations Local Employment and Procurement Plan	<b>Operation</b>	Governmental and non-governmental commerce organization meetings, industrial activities, specific meetings, supplier development programs	Before the operation starts Once in a year during the operation When Needed/When Requested During Operation
Non-governmental organizations (“NGOs”) in Kokshetau (may have an interest in the project (other interested parties))	Environmental Protection Urban Protection Preservation of the Cultural Heritage Negative perceptions regarding the management of potential issues, unexpected and emergent needs during Project 's construction and operations	<b>Pre-Construction/ Construction</b>	Dialogue and engagement meetings with interest groups/ NGOs Regular E&S progress update reports through website Leaflets, Digital information Posters Media	Before the construction starts Quarterly meetings When required/ When demanded
		<b>Operation</b>	Dialogue and engagement meetings with interest groups/ NGOs Regular E&S progress update reports through website Posters, Leaflets, Digital information Media	Before the operation starts Once in a year during the operation When required/ When demanded
Municipalities and Akimat offices (may have an interest in the project (other interested parties))	Management of environmental and social risks of the Project; and relations with the vulnerable groups	<b>Pre-Construction/ Construction</b>	Planned Meetings Brochures, Workshops	Minimum six monthly When required/ When demanded
		<b>Operation</b>	Planned Meetings Brochures,	Minimum six monthly

Target Group	Information to be shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
			Workshops	When required/ When demanded
Local and National State agencies and relevant authorities (may have an interest in the project (other interested parties))	Project activities and schedule Management of environmental and social risks by the Project, permitting	<b>Pre-Construction/ Construction</b>	Meeting with governmental institutions Project Company worksite visits	Continuously and When required
		<b>Operation</b>	Meeting with governmental institutions Project Company worksite visits	Minimum six monthly When required
Communities & NGOs, Emergency services, police, fire station, health and gendarmerie (may have an interest in the project (other interested parties))	Incident, Accident and Emergency	<b>Pre-Construction/ Construction</b>	Meetings Posters Public meetings Grievance tool on the website / call center / written application mechanism	Continuously and When required
		<b>Operation</b>	Meetings Posters Public meetings Grievance tool on the website / call center / written application mechanism	Continuously and When required
Media (may have an interest in the project (other interested parties))	Project activities Management of environmental and social risks by the Project	<b>Pre-Construction/ Construction</b>	Press conferences, Press releases, Media follow-up	Continuously and When required
		<b>Operation</b>	Press conferences, Press releases, Media follow-up	Continuously and When required
Unions (may have an interest in the project (other interested parties))	Labour Working Conditions	<b>Pre-Construction/ Construction</b>	Oversight meetings	Weekly scheduled Any time if needed
		<b>Operation</b>	Oversight meetings	Weekly scheduled Any time if needed

Target Group	Information to be shared	Phase	Engagement Vehicle/Methods	Schedule or Frequency
Vulnerable Groups (are affected or likely to be affected (directly or indirectly) by the project (affected parties))	Management of environmental and social risks by the Project Grievance mechanism Employment Any other interest of vulnerable groups Social Projects	<b>Pre-Construction/ Construction</b>	Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call center / written application mechanism	Meetings: six monthly during construction When required
		<b>Operation</b>	Planned meetings targeting vulnerable groups Leaflets and information sheets Grievance tool on the website / call center / written application mechanism	Meetings: Annual during operation When required
EPC-contractor and subcontractor employees (directly or indirectly) by the project (affected parties) Medical Staff to be/that might be relocated to Kokshetau hospital from the existing regional hospital	Employee welfare (i.e., health and safety) Subcontractor Management Procedure Retrenchment Plan	<b>Pre-Construction/ Construction</b>	Face to face interview OHS Committee Trainings Company social events for employees Employee Grievance Mechanism Project Company's worksite visits	Weekly, When required and With the grievance
		<b>Operation</b>	Face to face interview OHS Committee Trainings Company social events for employees Employee Grievance Mechanism	Monthly, When required and With the grievance

## 9.0 Roles and Responsibilities

The roles and responsibilities in relation to the implementation of this plan are presented in the following table. Please note that the roles and responsibilities of the Industry Operator is not definite at this stage of the Project. However, the Industry Operator shall also have the relevant similar positions and fill those positions with competent employees in order to fully implement this SEP during operation period. This table will be updated by the Project Company and/or the Industry Operator once the roles and responsibilities are made available by the Industry Operator before operation period.

Roles of Project Company Team	Responsibilities
Project Manager	<ul style="list-style-type: none"> <li>▪ To approve this plan and allocation of the required resources</li> <li>▪ To assign required number of personnel and resources required for implementation</li> <li>▪ To take appropriate actions to address major Non-Conformities, based on audit and monitoring reports</li> <li>▪ To ensure that the complaint-request portal is monitored regularly once it has been implemented, to track the number of grievances received and the number of unresolved grievances</li> <li>▪ To keep track of unresolved grievances that escalate to other formal channels                             <ul style="list-style-type: none"> <li>▪ To monitor progress and achievement in terms of KPI implementation</li> <li>▪ To monitor the number of meetings organized and number of meetings planned and realized</li> </ul> </li> </ul>
Corporate Communication Department	<ul style="list-style-type: none"> <li>▪ To support and coordinate communications to assure information disclosed on time to all stakeholders</li> <li>▪ To ensure the periodic measure communication delivery methods value to assure processes are effective</li> <li>▪ To support top management in collaborating, coordinating and improving communication with all employees</li> <li>▪ To develop integrated communications campaigns</li> <li>▪ Coordination/management of media relation and content development</li> <li>▪ Corporate Social Responsibility management                             <ul style="list-style-type: none"> <li>▪ Participating in all processes of external events and organisations related to the Project.</li> </ul> </li> <li>▪ Crisis communications planning and management</li> <li>▪ Strategically leading crisis communications efforts</li> <li>▪ To record all external stakeholder consultations and meetings<sup>5</sup></li> <li>▪ To record all internal and external grievances / requests (by whom, date, status, open, pending, closed etc.) in the Grievance Log/Database<sup>6</sup></li> <li>▪ To communicate with Environmental Department, Legal Department and other relevant departments for evaluation of the grievances/requests</li> <li>▪ To provide feedbacks to stakeholders in max. 30 days after receiving grievance/request</li> </ul>

<sup>5</sup> See Appendix 1

<sup>6</sup> See Appendix 2

Roles of Project Company Team	Responsibilities
	<ul style="list-style-type: none"> <li>▪ To coordinate Media Relations to ensure transparent communication with local and national press and other media institutions through appropriate means as such press statements, meetings</li> <li>▪ To prepare annual communication strategy</li> <li>▪ To ensure that this Management Plan is implemented effectively by the employees of the Project Company, EPC-contractor and sub-contractors</li> </ul>
Community Liaison Officer	<ul style="list-style-type: none"> <li>▪ To ensure that SEP is up to date and appropriate to the nature and scale of the Project</li> <li>▪ To communicate with Corporate Communication Department for evaluation of the complaints / suggestions</li> <li>▪ To make SEP available to all stakeholders, employees of the Project Company, EPC-contractor and sub-contractors</li> <li>▪ To ensure that SEP meets requirements of applicable legal requirements, commitments and standards</li> <li>▪ To act as a community liaison officer as the focal point for community concerns and will be conducting reach out activities</li> <li>▪ To ensure that action/measures related to stakeholder engagement directly under Project Company's responsibilities are carried out timely and adequately</li> <li>▪ To control effectiveness of SEP and performance of the sub-contractors through monitoring activities and external audits at the construction site</li> <li>▪ To collect, organize and review monitoring data and performance monitoring reports provided by the Project Company, EPC-contractor and sub-contractors</li> <li>▪ To report all non-compliances and accidents/incidents related to SEP and implementation of approved corrective actions</li> <li>▪ To ensure grievance mechanism trainings is provided by HSES department to the EPC-contractor and sub-contractors, collect training record provided by the EPC-contractor and sub-contractors and review them</li> <li>▪ To present the progress in terms of KPIs to the Project Manager along with monthly reports</li> <li>▪ To monitor the Project Company, EPC contractor and subcontractors to ensure their proper use of the grievance mechanism</li> <li>▪ Community insight and community stakeholder mapping</li> <li>▪ To ensure maximization of local hiring and procurement working with relevant human resources and other departments of the Project Company, EPC Contractor and th sub-contractors in accordance with the Local Employment and Proecurement Plan.</li> <li>▪ To ensure Gender Action Plan is implemented properly</li> <li>▪ To ensure GBVH Policy and Procedure is implemented properly with required due diligence.</li> </ul>
EPC-Contractor and Subcontractors	<ul style="list-style-type: none"> <li>▪ They are not allowed to implement engagement activities directly but have to collaborate with Project Company and within the Plan and liaise regularly with Communication Officer to discuss status of activities and on emerging issues that should be included in engagement activities.</li> </ul>

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Roles of Project Company Team	Responsibilities
	<ul style="list-style-type: none"><li>▪ If they receive complaints related to the construction or operation, they should let the Corporate Communications Department know so that complaints can be added to the log and investigated in a timely manner.</li></ul>

## 10.0 Grievance Mechanism

To prevent and/or resolve any grievances in a timely and effective manner, EBRD PR10 require establishing and maintaining a permanent mechanism for receiving and handling citizens' grievances, concerns and requests. Main principles of the Grievance Mechanism are:

- Project Company will encourage the use of grievance mechanism by making the grievance mechanisms (by the grievance box at the entrance of the Project Area open to public access, by the grievance boxes to be installed at the Akimat buildings belonging to the Project, by website form, e-mail, phone, WhatsApp, Telegram and other preferred online communication applications in the region, and in written form) visible in different platforms such as social media, billboards, etc. to ensure an open-communication policy.
- Any grievance or request can be submitted verbally (face-to-face or by telephone) or in written form by post, e-mail or by filling a grievance form<sup>7</sup> by any external or internal stakeholders.
- Stakeholders can raise their grievances and requests during any stakeholder engagement activity. All grievances will be recorded in the grievance log<sup>8</sup>.
- The stakeholders will be informed on the grievance mechanism during the stakeholder engagement activities.
- If the person filing a grievance would like to receive a written reply, the reliable contact details should be provided by that person.
- Both signed and anonymous grievances will be accepted. In both cases, any information on the grievance owner's personal details will not be shared with third parties and will be kept as strictly confidential.
- An investigation will be performed for each grievance and results will be recorded in grievance register. The issuer of the grievance will be informed on the findings of the assessment; whether the grievance is classified as appropriate or inappropriate.
- All project related grievances will be forwarded to Corporate Communication Department for preparing a reply and identifying mitigation measures, if appropriate. The registration of complaints will be completed within 7 days and the applicant will be informed along with the complaint registration number (all communication methods for grievance delivery defined in the first bullet above). The proposed mitigation measures will be discussed in advance with the complainant as far as practical. The maximum period of grievance processing is 30 days. The prepared reply will be approved by the EPC-contractor and sent to the grievance owner in 30 days after the receipt of the grievance.
- If the grievance holder has contact information, he/she will be notified when the grievance is received, answered and resolved. If it is necessary to contact with the contractors/subcontractors for problem resolution or mitigation measures, Project Company and contractors will act together.

<sup>7</sup> See Appendix 3

<sup>8</sup> See Appendix 2



- A register of grievances will be kept by the Corporate Communication Department. This register will include grievance status details.
- The news in press and social media will also be followed and recorded in a media news log. Negative news and concerns raised through media channels/platforms will be analyzed by Corporate Communication Department and will be processed through the grievance mechanism.
- Court cases and protests will be followed through grievance mechanism by including them into the grievance log. Corporate Communication department will be working with Legal Affairs and Security departments to include previous court cases and protests into the grievance mechanism.
- The grievances will be submitted to the CLO of the Project.
- The relevant contact information is given below.

**Kymbat Algozhina (Community Liaison Officer)**  
Telephone/Whatsapp :+7 701 320 4624  
e-mail: [infokokshetau@renell.kz](mailto:infokokshetau@renell.kz)

**Aynur Yessenbek (Document Control Manager)**  
Telephone/Whatsapp: +7 702 290 3957

Please note that during operation the Industry Operator shall assign a competent Community Liaison Officer for the effective management of the grievance mechanism. The information will be updated whenever there will be changes in contact numbers or focal persons.

- Stakeholders can submit individual complaints to the EBRD's grievance mechanism IPAM: <https://www.ebrd.com/ipam>.

## 11.0 Monitoring

The Project Company will monitor the implementation and effectiveness of the stakeholder engagement process by analyzing the feedback received from dialogue and engagement activities during construction period. The same will be valid for the Industry Operator during operation period. The key monitoring measures presented below referring to the Operation period will be monitored by the Industry operator's appointed CLO or a Project's CLO in general within the organizational structure of the Industry Operator. Monitoring results will be reported to the senior management through internal monthly reports, to the external stakeholders through sustainability disclosure, annual report, external monitoring reports, and to the Lenders through internal and external monitoring reports.

**Table 5: Key Monitoring Measures**

ID	Measure	Methods	Responsible Parties	Frequency
SEP-MON-01	Community and Employee Grievances	<p><i>separately for internal and external complaints;</i></p> <ul style="list-style-type: none"> <li>▪ number of open complaints and grievances in the month</li> <li>▪ number of complaints and grievances recorded in the month and from Project start</li> <li>▪ number of complaints and grievances resolved in the month</li> </ul>	CLO of the Project	Continuously

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ID	Measure	Methods	Responsible Parties	Frequency
		<ul style="list-style-type: none"> <li>▪ type of grievances</li> <li>▪ repeated grievances</li> </ul>		
SEP-MON-02	Community engagement activities	Records of formal and informal engagements with stakeholders.	CLO of the Project	Every 3 months during construction, Every 6 months during operation
SEP-MON-03	Disclosure materials disseminated	Records of the types and numbers of engagement material such as leaflets, brochures, newsletters prepared and distributed.	Corporate Communication Officer of the Project	Every 3 months during construction, Every 6 months during operation
SEP -MON-04	Training	Records of trainings	Human Resources Department of the Project	Continuous
SEP-MON-05	Media Monitoring	Any media output that makes reference to the Project	Corporate Communication Department of the Project	Weekly during construction, Monthly during operation

## 11.1 Key Performance Indicators

The table below summarizes the key performance indicators and associated key monitoring actions that can be used to assess the progress and effectiveness of proposed mitigation strategies.

**Table 6: Key Performance Indicators**

ID	KPI	Target	Monitoring Measure	Reporting
SEP-PER-01	Number of community and employee grievances separately	Total number reduced each reporting period	Complaints Log	Monthly reporting to management
	Number of grievances resolved/responded /closed in 30 days	Target of 100%		
SEP-PER-02	Stakeholder engagement activities performed No. responses issued to stakeholders within 30 days of any questions or comments raised	Target of 100% in accordance with the programme	Stakeholder engagement records	Monthly reporting to management
SEP-PER-03	Efficient use of disclosure materials	Use of disclosure materials at all engagement activities	Stakeholder engagement records	Monthly reporting to management

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		Number of people reached		
SEP - PER-04	% of visitors who have received relevant and adequate grievance mechanism training	100% compliance with training plan	Training records	Monthly reporting to management

A KPI report (or an excel format) will be prepared allowing the Project Manager to quickly and easily review and analyze KPIs and thereby know how their organization is performing against SEP targets. This report will be submitted to the Project Manager by the Corporate Communication Officer along with the monthly reports. This report will show the changes of each determined KPI. If the Project Manager sees a problem with the objectives, he/she will contact Corporate Communication Officer in order to eliminate each problem.

## 12.0 Audit and Reporting

### 12.1 Internal Auditing

The correct implementation of this Plan is verified through internal Management System audits. The internal audit about grievance mechanism will be conducted by the Project Company, EPC-contractor and subcontractors weekly and by Corporate Communication Officer monthly for the construction period. Preventive/Corrective actions will be identified after each audit. Top management review audit results and the Preventive/Corrective actions and defines additional measures if necessary. The similar management of the grievance mechanism will be executed by the Industry Operator during operation period.

### 12.2 External Auditing

Conformance with this plan will be subject to periodic assessment by the Lenders.

### 12.3 Record Keeping

The following records will be kept in accordance with Project's record keeping procedures in line with ESMS;

- Trainings records
- Community meetings records and material (e.g., leaflets, brochures) with gender disaggregated as committed, including minutes and list of participants
- Stakeholder engagement activities date, type and location
- Internal and external grievances and associated records (for sample template, please refer to Annex – 1).
- Opinions/suggestions provided by community members during stakeholder engagement activities
- Press releases and interviews
- Media surveys
- Audit results
- Routine ESMS performance reports

### 12.4 Internal and External Reporting

1. Internal Reporting: the Project Company and Industry Operator will prepare internal monthly reports on SEP activities, internal and external grievances, requests for construction and operation periods, respectively.

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2. External Reporting: the Project Company will include the following as a minimum to the annual Environmental and Social Performance report to be produced quarterly during construction; and the Industry Operator annually during operation:
  - Summary of grievances
  - Summary of consultation and engagement activities together with the raised concerns regarding SEP

An annual review and summary of SEP reporting will be disclosed in the website.

## 13.0 Training

All relevant employees of the Project Company, EPC-contractor and subcontractors will have a stakeholder engagement and grievance mechanism training as part of site induction program. All staff personnel will receive as part of their worksite induction information on the grievance mechanism and how to access it, including the need to direct complaints from third parties to the mechanism.

A training on SEP will be provided to Project Company, EPC-contractor and subcontractors by ESMS Officer at the beginning of the construction works. The trained staff will be able to provide grievance mechanism trainings to their own workforce.

The training subjects at least includes:

- Requirements of SEP
- Legal requirements
- Grievance mechanism

The same training requirements will be valid for the Industry Operator to implement before and during the Operation period.



## **APPENDICES**

**Appendix 1: Template for Stakeholder Consultation Log**

**Appendix 2: Template for Grievance Log**

**Appendix 3: Template for Grievance Form**

**Appendix 4: Stakeholder Engagements and Events**

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## APPENDIX 1

# Template for Stakeholder Consultation Log

No	Date	Organized/Conducted by	Name Surname	Position /Title (if the stakeholder is a representative of an institution)	Stakeholder Category	Number of Female Stakeholders Consulted	Number of Male Stakeholders Consulted	Reason for meeting	Meeting Place and Time	Subject	Decisions Taken
		EPC-contractor Corporate Communication Dept.			Local community members			Visiting			
		EPC-contractor Legal Dept.			Akimat			Grievance			
		EPC-contractor Environment Dept. Manager			Municipality			Regular information sharing			
					NGO			Request for meeting			
					Media						

## APPENDIX 2

### Template for Grievance Log

No	Date	Type	Name-Surname	Received through	Gender (For real persons)	Received by	Stakeholder Category	Grievance Category	Approval Status	Actions Taken	Notification Date (in 7 seven days after received date)	Closing Date	Closing Duration (day)	Closing Explanation	Status
		Grievance		Face-to-face			Public institution	Damage to building/structure/land	Not approved						Open
				Petition			Akimat	Payments	Under evaluation						
				E-mail			Local community	Working conditions							
				Phone			Contractor firm	Environmental impact (dust, noise etc.)							
				Media			Contractor employee	Request for donation by individuals							
				Social Media			NGO	Request for employment							
				Website			Media	Dismissal							
								Request for support/sponsorship by institutions							
								Request for support by local communities							
								Traffic risks							

## APPENDIX 3

# Template for Grievance Form

A – General Information		
Received by:		
Registration Form No:		
Registration Date:		
Registration Location:	<input type="checkbox"/> Field <input type="checkbox"/> Office	
Registry Type:	<input type="checkbox"/> Grievance <input type="checkbox"/> Request	
B- Received Through		
<input type="checkbox"/> Phone <input type="checkbox"/> Petition <b>(Copy of the petition must be added to this form)</b>	<input type="checkbox"/> Face-to-face <input type="checkbox"/> Meeting or focus group <input type="checkbox"/> E-mail <input type="checkbox"/> Other	
C.1- About Grievance Holder	C.2- Stakeholder Category	
Name Surname	Anonymous (when requested)	<input type="checkbox"/> Public Institution/Local Government <input type="checkbox"/> Local community (Individual) <input type="checkbox"/> Local community (Community) (number of community members.....) <input type="checkbox"/> NGO <input type="checkbox"/> Subcontractor firm <input type="checkbox"/> EPC-contractor employee <input type="checkbox"/> Contractor/subcontractor employee <input type="checkbox"/> Media
Contact Information	Tel: E-mail:	
Address		
Province/District		
Signature of the Grievance Holder <i>Only for grievances/requests received face-to-face, during meetings or office visits</i>		



D.1- About Grievance/Request	D.2- Grievance/Request Type
<i>Detailed description of the grievance/request</i>	<ul style="list-style-type: none"><li><input type="checkbox"/> Damage to building/land/structure</li><li><input type="checkbox"/> Environmental impact (pollution, dust, noise etc.)</li><li><input type="checkbox"/> Traffic risks</li><li><input type="checkbox"/> Request for employment</li><li><input type="checkbox"/> Working conditions</li><li><input type="checkbox"/> Dismissal</li><li><input type="checkbox"/> Payments of employee wages</li><li><input type="checkbox"/> Request for donation (individual)</li><li><input type="checkbox"/> Request for support/sponsorship (institutions)</li><li><input type="checkbox"/> Request for local community</li></ul>
E- Actions to be Taken	

## APPENDIX 4

# Stakeholder Engagements and Events

### Stakeholders That Were Interviewed During the Assessment Site Visit

No	Stakeholder Group	Stakeholders	Date
1	Local executive authorities	Akimat of the city of Kokshetau (Daulet Kurmetovich Zhunusov - Deputy Akim of Kokshetau for Housing and Communal Services and Landscaping)	26-28.05.2023
2		State Institution "Department of Housing and Communal Services, Passenger Transport and Roads of Kokshetau" (Adlet Boltayevich Rakhimzhanov - Head of Department)	26-28.05.2023
3		State Institution "Department of Land Relations, Architecture and Urban Planning of Kokshetau" (Akan Dumanovich Ayashev - Acting Head of Department Diana Orymbayevna Mukhambetkhaliyeva - Head of the Architecture Sector)	26-28.05.2023
4		State Institution "Department of Employment, Social Programmes and Civil Registration of Kokshetau" (Radimkhan Zhanbulatovna Tokisheva - Head of Department)	26-28.05.2023
5	Health care facilities	State Communal Enterprise on the Right of Economic Management "Multidisciplinary regional hospital" under the Health Department of Akmola region (Dmitry Petrovich Chaykov- Inspector of the Division of Customs Procedures of the Department of Organization of Customs Control; Aigul Amantaevna Vazirova - Head of Nursing Staff Management; Assel Dauletovna Beisenova - Head of Human Resources Department)	26-28.05.2023
6	NGOs	Association of Legal Entities "Union of Persons with Disabilities of Akmola region "Birlik" (Ramazan Saparovich Mukataev – Chairman)	26-28.05.2023

7	Business	"Arsha" LLP (grocery shop and pharmacy) (Orynzhamal Eslyambekovna Kaskarova – Head)	26-28.05.2023
8		"Berket" grocery shop (Zara – Seller)	26-28.05.2023
9	Residents of the city	Passerby (Alina - Medical college student Askar)	26-28.05.2023
10		A visitor to the "Berket" grocery shop (Ivan, Tatyana)	26-28.05.2023
11		People living in the neighbourhood of the existing regional hospital (Dauren)	26-28.05.2023
12		People living in the neighbourhood of the existing regional hospital (Mikhail)	26-28.05.2023
13		Saryarka microdistrict, 14/3 (Aliya Kazikanovna Albekova)	26-28.05.2023
14		Kokshe Su, 1a (Dana)	26-28.05.2023
15		Kokshe Su, 1 (Hassen Ramazanovich Duysenov)	26-28.05.2023
16		Saryarka microdistrict, 32 (Bakhytzhan Amanzholovna Zhanaeva - House Leader Raisa Anatolievna Tisova)	26-28.05.2023
17		Saryarka microdistrict, 32a (Zhanargul Sairanbekovna Kunshuakova - House Manager Tursynay Nigmatovna NURGOZHINA)	26-28.05.2023
18		Saryarka microdistrict, 8/4 (Tolemis Shaikenovich Karabayev - House Leader Turar Kosymovich Sharipov)	26-28.05.2023

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19		Saryarka microdistrict,8/3 (Zhumabek Sharip - House Leader)	26-28.05.2023
20		Saryarka microdistrict,9/8 (Aliya Samatovna Akylbekova - House Leader)	26-28.05.2023
21		Saryarka microdistrict, 6/3 (Madina Kayrzhhanovna Mardusheva - House Leader Irina Aleksandrovna PROTOSENYA Almagul Esilbayevna Rakhmetzhanova)	26-28.05.2023
22		Saryarka microdistrict, 32 (Ekaterina Sergeevna Maslova)	26-28.05.2023
23		Saryarka microdistrict, 14/4 (Assemgul - House Leader)	26-28.05.2023

**List of participants of public hearings held in accordance with national legislation**

No	Stakeholders
1	State Agency "Akmola Region Natural Resources and Environmental Management Regulatory Department" Chief Expert of the Environmental Regulation Department
2	RGU "Department of Ecology in Akmola Oblast" Chief Specialist of the State Environmental Control Department
3	State institution "Department of architecture of the city of Kokshetau" Chief specialist of the department
4	RenEII Kokshetau LLP General Director

5	Private company "RENELL" director of legal affairs
6	RENELL Private Company Director of Medical Services and Equipment
7	Private company "RENELL" project coordinator
8	LLP "RenAll Kokshetau" member of the Board of Directors
9	Creative Project KZ LLP (Creative Project KZ) translator
10	Creative Project KZ LLP (Creative Project KZ) medical consultant
11	Creative Project KZ LLP (Creative Project KZ) lead architect
12	Creative Project KZ LLP (Creative Project KZ) head project coordinator
13	Creative Project KZ LLP (Creative Project KZ) lead architect
14	IP "Tabys" ecologist
15	IP "Tabys" ecologist
16	GKP on REM "Multiprofile regional hospital under the Health Department of the Akmola region" specialist of the scientific department
17	GKP on REM "Multiprofile regional hospital under the Health Department of the Akmola region" workshop therapist
18	GKP on REM "Multiprofile Regional Hospital under the Health Department of Akmola Region" Deputy Director for Oncology



19	GKP on REM "Multiprofile regional hospital under the Health Department of the Akmola region" head of the dermatovenerological service
20	GKP on REM "Multiprofile regional hospital under the Health Department of the Akmola region" head of the department of neurology
21	Local Resident (name not included)
22	Local Resident (name not included)
23	Local Resident (name not included)
24	Local Resident (name not included)
25	Local Resident (name not included)
26	Local Resident (name not included)
27	Local Resident (name not included)



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