

JANUARY 2022
THE STATE COMMITTEE OF THE REPUBLIC OF UZBEKISTAN ON ECOLOGY AND
ENVIRONMENTAL PROTECTION
EUROPEAN BANK FOR RECONSTRUCTION AND DEVELOPMENT

UZBEKISTAN: KARAKALPAKSTAN AND HOREZM SOLID WASTE MANAGEMENT - FEASIBILITY STUDY

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR
REPUBLIC OF KARAKALPAKSTAN

Contract ID No. C43176/11619/71786



ADDRESS CECT Consulting, inženiring
in svetovanje d.o.o.
7b Ankaranska str.
6000 Koper, Slovenia

TEL +386 59 052 423

FAX +386 59 052 424

WWW cect.eu

UZBEKISTAN: KARAKALPAKSTAN SOLID WASTE MANAGEMENT - FEASIBILITY STUDY

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR REPUBLIC OF KARAKALPAKSTAN

Contract ID No. C43176/11619/71786



In association with:



Disclaimer

The content of this Report is the sole responsibility of the Consultant and can in no way be taken to reflect the views of the European Bank of Reconstruction and Development (EBRD).

Notice of CECT Consulting, inženiring in svetovanje d.o.o.

This document has been prepared by Subconsultant Ecoline International Ltd (Sofia, Bulgaria) in line with the Terms of Reference "Uzbekistan: Karakalpakstan and Horezm Solid Waste Management Project: Feasibility Study". It is intended solely for the EBRD and the State Committee of the Republic of Uzbekistan on Ecology and Environmental Protection. CECT Consulting, inženiring in svetovanje d.o.o. assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

Document History

Project ID No.: 79084			Document Ref.: 0010			
Version	Purpose /Name	Originated	Checked	Quality Control Certified *	Authorized Representative (Project Director)	Date
1	SEP (Republic of Karakalpakstan) (draft for discussion with EBRD, GosKomEcologiya and Toza Hudud SUE in the RK)	Ecoline International Ltd	SES	SES	SES	26/04 /21
2	SEP (Republic of Karakalpakstan) (draft revised based on EBRD comments)	Ecoline International Ltd	SES	SES	SES	08/10/21
3	SEP (Republic of Karakalpakstan) revised per GosKomEcologiya's comments	Ecoline International Ltd	SES	SES	SES	31/01/22

* signed as below

Report Quality Control Certification

As per the CECT Consulting, inženiring in svetovanje d.o.o. procedures, this report and its content has been proofread and controlled for quality against the Terms of Reference, and its subsequent possible modifications.

Signature:

Name: Sergei Stepanishev, Project Director

Company: CECT Consulting, inženiring in svetovanje d.o.o.

Date: 31 January 2022



EBRD signoff:



Ecoline
International

LIST OF ABBREVIATIONS

E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
ESA	Environmental and Social Assessment
ESAA	Environmental and Social Audit and Assessment
FS	Feasibility Study
GosKomEkologiya	State Committee on Ecology and Environmental Protection
ha	Hectare
LLC	Limited liability company
Ltd	Limited company
m ³	cubic metre
MCA	Mahalla citizens assembly
MSW	Municipal solid waste
NGO	Non-governmental organisation
NTS	Non-technical Summary
OHL	Overhead transmission line
RK CEEP	Committee of Ecology and Environmental Protection of the Republic of Karakalpakstan
PR	Performance Requirement of EBRD
RK	Republic of Karakalpakstan
RoU	Republic of Uzbekistan
RTA	Road Traffic Accident
SEC	Statement of Environmental Consequences
SEP	Stakeholder Engagement Plan
SER	State Environmental Review
SMS	Short Message Service
SPZ	Sanitary Protection Zone
SUE	State Unitary Enterprise
USD	US dollar
WCS	Waste collection station
WSP	Waste sorting plant
TS	Transfer station
VCA	village citizens assembly

TABLE OF CONTENTS

1. INTRODUCTION	6
2. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE REQUIREMENTS ...	7
2.1. RoU legislation requirements.....	7
2.2. EBRD requirements.....	8
3. PROJECT DESCRIPTION	9
4. COMPANY'S STAKEHOLDER ENGAGEMENT EXPERIENCE	12
4.1. Company's stakeholder engagement organisation practice	12
4.2. Company's stakeholder engagement experience in the framework of the Project development.....	13
5. STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	14
5.1. Stakeholder identification methodology	14
5.2. Key stakeholder categories and groups.....	14
5.3. Stakeholder analysis	16
6. STAKEHOLDER ENGAGEMENT PROGRAMME	23
7. GRIEVANCE MECHANISM	33
8. MONITORING, ASSESSMENT, AND REPORTING	34
APPENDIX 1. SAMPLE GRIEVANCE FORM	35

LIST OF TABLES AND FIGURES

Table 1. Potentially affected stakeholders and analysis of their interests / attitudes towards the Project	17
Table 2. Other stakeholders and analysis of their interests in / attitudes to the Project	20
Table 3. Stakeholder Engagement Programme	25
Figure 1. Location of the Project's facilities in the RK and the proposed scheme of the collected MSW transportation.....	11

1. INTRODUCTION

The Republic of Uzbekistan (RoU) has approached the European Bank for Reconstruction and Development ("EBRD" or "the Bank") with a request to participate in financing the modernization of the municipal solid waste (MSW) management infrastructure in the Republic of Karakalpakstan (RK) ("the Project"). The volume of the proposed investments is 66.3 million USD in the form of sovereign loans.

These funds are planned to be spent on (i) the reconstruction (up to sanitary standard) of the three existing MSW landfills and construction of one new MSW sanitary landfill, each compliant with EU standards and complemented by waste sorting plants (WSP), (ii) construction of the eight waste transfer stations (TSS), (iii) purchase of the necessary equipment, specialized vehicles and machinery for these facilities, as well as (iv) upgrade of the access road to one of the MSW landfills. The mentioned Project components will be designed in line with the national legislation and EU requirements.

The Project will be implemented by the State Committee of the RoU for Ecology and Environmental Protection (GosKomEkologiya). Toza Hudud State Unitary Enterprise (SUE) in the RK (Toza Hudud SUE or "the Company"), under the Committee of Ecology and Environmental Protection of the Republic of Karakalpakstan (RK CEEP), being responsible for MSW collection, transportation and disposal in almost the whole region, will provide local technical support to GosKomEkologiya and will be the owner of the Project facilities.

The feasibility study (FS) for the Project is being developed by CECT Consulting, inženiring in svetovanje d.o.o. (Slovenia). Ecoline International Ltd. (Bulgaria) ("the Consultant") addresses environmental and social (E&S) issues within the FS development.

The Consultant has completed the E&S classification of the Project components in accordance with the EBRD's E&S Policy (2014). As agreed with the Bank, all proposed facilities were categorised 'B'. In this regard, the E&S Audit of the current Company's operations, as well as the E&S Assessment (ESA) of the Project were conducted. This **Stakeholder Engagement Plan (SEP)** has been developed as part of the ESA.

This SEP has been prepared in accordance with the applicable requirements of the EBRD and the national legislation. It represents the Company's systematic approach to organising stakeholder engagement during both the Project design development and the Project implementation.

The SEP is a 'living' document and should be regularly reviewed, supplemented, and / or amended as the Project evolves. This SEP as well as its subsequent editions will be disclosed so that all the stakeholders can get familiar with this document.

Restrictions impacting the Company's stakeholder engagement due to the COVID-19 pandemic

Restrictions related to the COVID-19 pandemic, primarily social distancing measures, may force not to use some approaches to stakeholder engagement and consultations. This may lead to the exclusion of certain groups from the engagement process, for example, those who do not have access to the Internet or mobile communications. GosKomEkologiya should consult with the Ministry of Health of the RoU and its territorial divisions regarding the implementation of stakeholder engagement (in accordance with the requirements of national legislation and the EBRD). This SEP proposes some alternative methods for stakeholder engagement in the context of the COVID-19 pandemic (**Table 3**).

2. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE REQUIREMENTS

The Project-related stakeholder engagement will be carried out in accordance with the applicable requirements of the Bank and the RoU legislation. These requirements are briefly described below.

2.1. RoU Legislation Requirements

At present, the main regulatory legal acts of the RoU governing stakeholder engagement during the development of project design documentation are:

- The Law of the RoU on Environmental Expertise of 25 May 2000 No. 73-II¹;
- The Resolution of the Cabinet of Ministers of the RoU on Further Improvement of the Mechanism for Environmental Impact Assessment of 7 September 2020 No. 541².

The Law of the RoU on Environmental Expertise defines environmental expertise as establishing the compliance of the planned activity with environmental requirements and the admissibility of the implementation of the object of environmental expertise. Environmental expertise is carried out in the form of state and public environmental expertise, as well as environmental audit (Article 4). The objects of the state environmental review (SER) are pre-project and project documentation justifying economic activity. Based on the results of the SER, a conclusion is drawn up regarding the admissibility of the implementation of the SER object. Implementation of the project without SER approval is prohibited.

Article 6 of the law establishes requirements for the information disclosure on planned activities as part of the environmental expertise procedure: *“Customers of environmental expertise can publish an announcement in the media about its implementation. In this case, information on its results is published within a month from the date of completion of the environmental expertise”*. The list of objects for which the announcement of the SER and the publication of information about its results in mass media is mandatory is currently not defined in the legislation. Thus, when conducting an SER, the decision to disclose information about the planned activity remains at the discretion of the customer.

The list of planned economic activities subject to SER comprising four categories (by environmental impact of the proposed production facilities) is provided in **Annex 1** to the **Resolution of the Cabinet of Ministers of the RoU of 7 September 2020 No. 541**. **Annex 2** to the Resolution includes requirements to the environmental impact assessment (EIA) materials, which should be prepared for proposed facilities of Category I, II and III from Annex 1. This annex also defines stages of the EIA procedure including development of the 1) Draft Environmental Impact Statement (Draft EIS); 2) Environmental Impact Statement (EIS), and 3) Statement of Environmental Consequences (SEC). An EIS and SEC are developed when the SER of the Draft EIS have identified the need for conducting additional surveys, special laboratory analyses, and the developing reasoned environmental protection measures (para. 24b). According to Annex 2, the EIS should include “positive conclusion of public hearings, information on how suggestions and objections on the Project received during the public hearings are addressed” (para. 24b). The SEC should report on revisions to the Project solutions and actions taken to address suggestions on the Project received during the public hearings (para. 25). **Annex 3** to the Resolution defines the order for public hearings for the proposed activities subject to SER. Public hearings to discuss the feasibility of any planned economic activity is compulsory for proposed activities classified as Category I and II activities³. District (city) executive authorities (khokimiyats) are the organisers of public hearings, and the costs associated with public hearings should be financed by the Project

¹ <https://www.lex.uz/acts/9760>.

² <https://lex.uz/docs/4984501>.

³ The proposed MSW landfills belong to Category I by environmental impact (high-risk facilities), and TSs and constructed/reconstructed roads belong to Category III (low-risk facilities).

developer or from other sources not prohibited by law. The procedure for holding public hearings, as well as the participants of the hearings and their responsibilities are described in Annex 3. The Resolution does not provide any additional instructions for public consultations on proposed Category III and IV activities.

2.2. **EBRD Requirements**

All projects financed by EBRD shall be structured to meet the requirements of the EBRD [E&S Policy](#), which includes ten Performance Requirements (PRs) for key areas of E&S sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. This particular Project complies with the [EBRD E&S Policy of 2014](#). In addition, EBRD's [Independent Project Accountability Mechanism](#), 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 organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its E&S Policy 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 Bank. In order to ensure the most effective contact with all stakeholders, the engagement process should be initiated at the initial stages of the development of a Category B project and continue throughout the entire project life cycle. Stakeholder engagement should include the following elements:

- Identification and analysis of stakeholders, including those that may be particularly or disproportionately affected due to their disadvantageous or vulnerable position, and the compilation of a stakeholder register;
- Planning for stakeholder engagement and the development of an SEP that provides for an ongoing process of stakeholder engagement throughout the project life-cycle;
- Disclosure of relevant information about the project in the language(s) of the local population in an accessible and culturally appropriate form;
- Creation and maintenance of a grievance mechanism that allows stakeholders to voice their concerns related to the project's activities, especially in the E&S sphere;
- Conducting meaningful consultations with stakeholders.

For the COVID-19 pandemic, the EBRD issued a briefing note to PR10 recommending the use of "*alternative methods of disclosure and stakeholder engagement*"⁴; in particular: more informative content on project websites, the use of brochures, newsletter distribution via e-mail and messaging applications (e.g. WhatsApp, Telegram), sharing information and receiving feedback on social networks (e.g. Facebook, Instagram), sharing information through mass media, and posting announcements on local information stands. Recommended stakeholder engagement methods include telephone and online surveys and questionnaires, online engagement through social media, engagement through employees living in the locations of the Project sites, and through television and radio broadcasts. This SEP takes into account the EBRD's recommendations and proposes alternative engagement methods (**Table 3**).

⁴ Stakeholder engagement (PR10) COVID-19 EBRD briefing note (in English). <https://www.ebrd.com/documents/environment/ebd-covid19-briefing-note-stakeholder-engagement.pdf?blobnocache=true>.



3. PROJECT DESCRIPTION

Regional Toza Hudud SUE in the RK and its district / city branches are in charge of the collection, transportation, and disposal of MSW in the RK. To date, the Company's balance sheet includes 15 MSW landfills; 709 waste collection stations (WCSs) with containers for MSW collection; garages and workshops at the Company's district branches, where special vehicles and specialized equipment⁵ are serviced and repaired.

The Preliminary E&S Assessment of the Project⁶ identified that the activities of all existing MSW landfills in the region do not comply with the national rules and requirements for the arrangement and operation of MSW landfills, nor do they comply with a number of EBRD's E&S requirements.

The Project implementation is planned in accordance with the principles, goals and relevant activities included to the national **Strategy for MSW management in the RoU**⁷ (2019). In accordance with the Priority Investment Program and Project Implementation Plan (PIP), the Project includes the following components⁸:

- **construction of one MSW landfill in Nukus City and reconstruction of the three existing MSW landfills** in Turtkul, Kungrad, and Karauzyak districts with their expansion; each MSW landfill will include, in addition to a residual waste disposal area, a waste sorting plant (WSP), a composting site for biodegradable waste, and a number of ancillary facilities; a low-capacity medical waste incinerator is planned at the Nukus City Landfill (700 tonnes/year);
- **construction of eight waste transfer stations (TSs)** in Amudarya, Khodjeyli, Beruniy, Ellikkala, Kanlykul, Muynak, Chimbay, Takhtakupyr districts (to be located within the territory of the existing district MSW landfills);
- **construction/reconstruction of the entrance roads** to the above MSW landfills;
- **reconstruction of the access road** to the Kungrad District Landfill (including two bridges across the irrigation/drainage channels).

The Project also provides for the purchase of the necessary and specialized equipment and vehicles for these facilities, and the institutional development activities.

The closure and remediation of the existing MSW landfills, construction / reconstruction of other roads connecting the Project facilities (not covered by the Project investments), site preparation for the TSs to be located at the existing landfills⁹, and construction of new overhead transmission lines (OHLs) to certain Project facilities are considered as **associated projects**. They are not part of the Project and will be financed from the state budget and coordinated by GosKomEkologiya. However, they are subject to the EBRD's E&S requirements.

The locations of the Project facilities and the proposed scheme for MSW transportation are presented below (

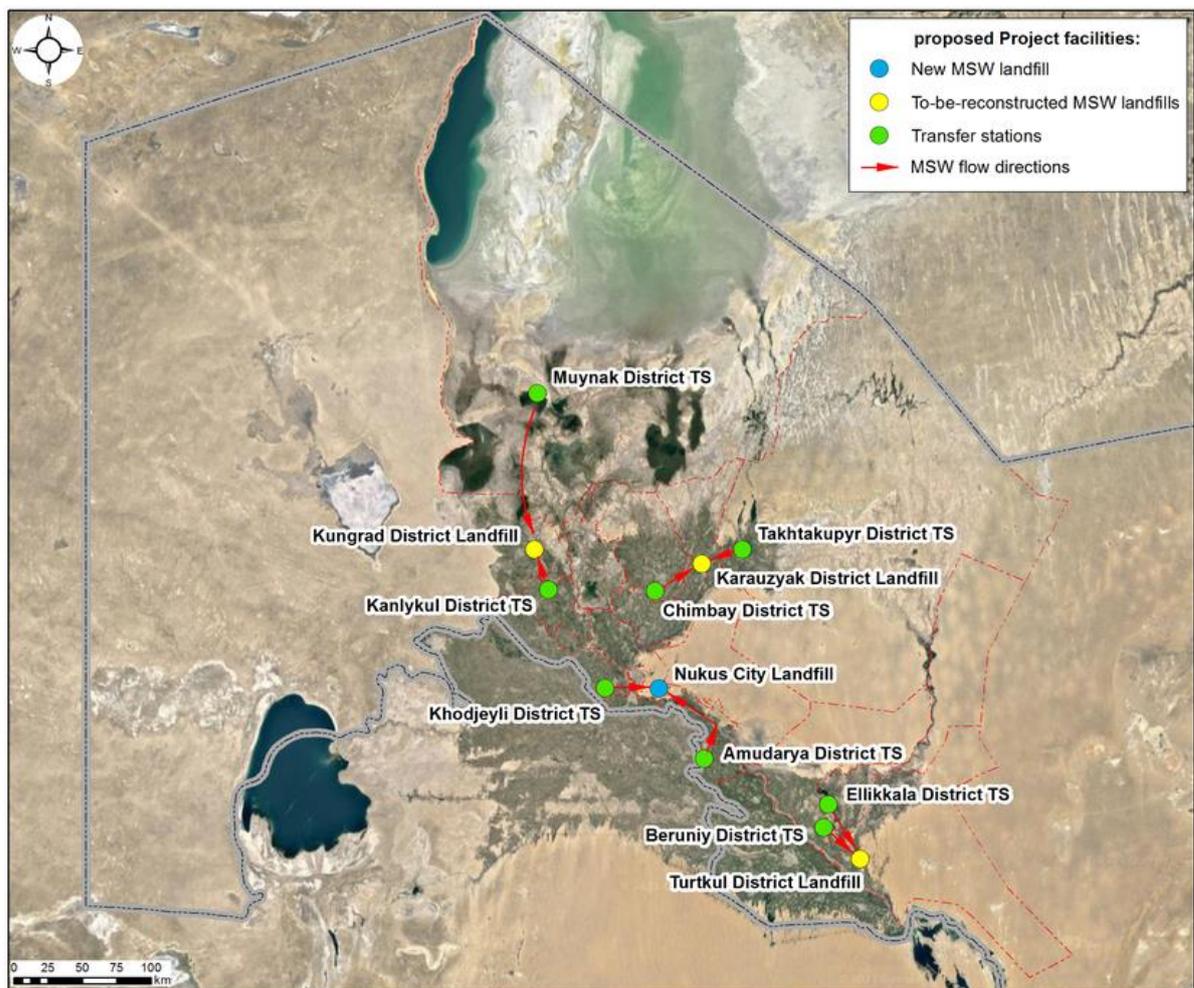
⁵ Waste trucks, bulldozers, loaders, etc.

⁶ Ecoline International Ltd. 2019. Solid Waste Management Infrastructure Modernisation Project, the Republic of Karakalpakstan and Khorezm Region (Uzbekistan). Environmental and Social Scoping Study. Final report.

⁷ Resolution of the President of the RoU of 17 April 2019 No. PP-4291 on Approval of the Strategy for MSW management in the RoU for the period 2019-2028. <https://lex.uz/docs/4291733?query=%D0%BF%D0%BB%D0%B0%D1%81%D1%82%D0%B8%D0%BA>

⁸ CECT Consulting. 2020. Uzbekistan: Solid Waste Management in Horezm Region and the Republic of Karakalpakstan: Feasibility Study. Priority Investment Programme and Project Implementation Plan. The Republic of Karakalpakstan, December, 2020.

⁹ Site preparation works for these TSs will include: 1) dismantling of redundant buildings and structures, 2) removal of accumulated waste, and 3) earth works for levelling the sites.



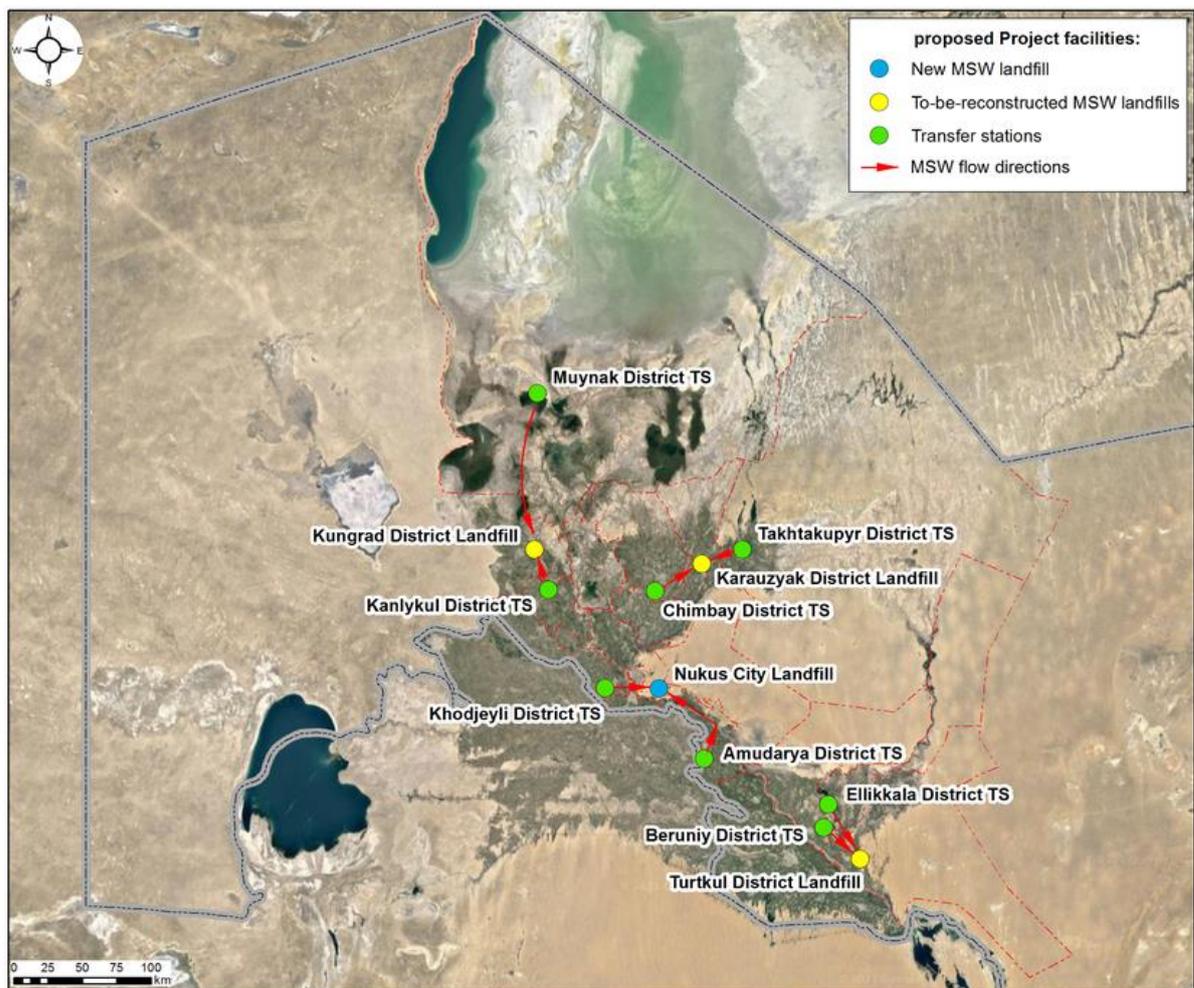
Note: TS – (waste) transfer station

Figure 1).

A distinctive feature of the proposed MSW landfills is their design as an integrated facility: a WSP, a composting site, and a residual waste disposal area will be located within one site.

The PIP provides for the construction and commissioning of eight TSs in parallel with the MSW landfills. Each TS will have four 60 m³ MSW containers and two container trucks. It is proposed that unsorted MSW accumulated at TSs and in the nearest residential areas will be delivered to the waste reception area of the MSW landfills. From there waste will be directed to the MSP sorting lines with automated and manual sorting. The MSW will be sorted to separate waste into: **recyclable materials** that can be processed into commercial products; **biodegradable waste**, from which stabilat, compost-like output and / or agricultural compost will be produced at the composting site; **waste with energy value**, which can become raw material for the production of alternative refuse-derived fuel; **waste that is not subject to further processing** (residual waste) will be disposed at the residual waste disposal area. Hazardous medical waste intended for incineration will be delivered to the Nukus City MSW Landfill.

Auxiliary facilities for the proposed MSW landfills will include an administrative building for personnel, a weight bridge, a wheel washing and disinfection station, a water well (for service water supply), a shed for special vehicles, workshops, and an electrical substation. The sites will be also equipped with systems to manage landfill leachate, to collect and treat surface runoff, and control fires. Quality of surface and groundwater in the vicinity of landfill sites' will be monitored.



Note: TS – (waste) transfer station

Figure 1. Location of the Project’s facilities in the RK and the proposed scheme of the collected MSW transportation

The selection of site for the new proposed landfill in the RK and the selection of the landfills to be modernized and extended were carried out in several stages and included analysis of siting alternatives. The presence of sensitive receptors (residential areas/houses, water bodies and water courses, and protected natural areas) within the proposed sites and their surroundings were considered when analysing the alternatives. As a result, the landfills were selected to be located so that their normative (maximally assumed) sanitary-protection zones (SPZs) would not contain any residential dwellings. The land allocation materials were reviewed and approved by the competent authorities including those responsible for environmental protection and sanitary and epidemiological welfare.

According to the preliminary estimates, the Project’s land needs include a) 15-16 ha for each of the MSW landfills located in the Karauzyak, Turtkul and Kungrad districts, and around 24 ha for the MSW landfill in Nukus, b) from 0.5 to 1.0 ha for the TSs (depending on their capacity and the number of used waste containers). Minor land allocation and easements might be required for the (re)construction of the entrance roads and the access road to the Kungrad District Landfill.

For the construction of the MSW landfills, land plots were allocated by the decisions of the khokims of the respective districts. The allocated land plots are sufficient for accommodating two cells for residual waste disposal at each landfill that are proposed to be financed via the EBRD loan. In order to construct third cells at the landfills and thus to provide for a 15-year

estimated service life, about 12 ha should be added in total to the landfill sites in the nearest future. This would help avoid economic and physical displacement impacts on the local population later on. All proposed TSs will be sited within the existing MSW landfills operated by the Company, and their construction would not require new land acquisition.

The tender process for design and build contracts is expected to commence in late 2022 – early 2023; construction works will indicatively start in the second half of 2023 subject to successful procurement of the above contracts and following completion of detailed design. The duration of the construction stage to last 2-3 years. The estimated service life of the MSW landfills will be 15 years.

The estimated need for **labour resources at the construction stage** is as follows (no inflow of labour force from abroad or other regions of the country is expected): a) around 80 jobs, including 16 drivers of special vehicles and 56 construction workers, in 2023, when the construction of the MSW landfills commences, b) a total of around 160 jobs, including 40 drivers of special vehicles and about 110 construction workers, and about 50 people involved in road construction, in 2024, when the construction of MSW landfills continues and transfer stations would also be built, entrance roads would be constructed / reconstructed, and a public access road to the Kungrad District Landfill would be reconstructed. The number of construction staff will be precised at the stage of technical design and selection of construction contractor(s).

During operations, the Project implementation would result in creation of ca. 350 new jobs for men and women with different educational levels, including 310-320 positions at the four MSW landfills, and about 30 positions at the TSs. The remaining 30-40 positions will be open for the drivers of specialized vehicles and equipment. To the maximum extent possible, it is planned to employ the staff from district branches of Toza Hudud SUE in the RK whose jobs will be lost due to the closure of the existing Company's MSW landfills. Measures will be taken to provide employment opportunities for residents of nearby settlements. The local population will be informed about the open vacancies in due course.

4. COMPANY'S STAKEHOLDER ENGAGEMENT EXPERIENCE

4.1. Company's Stakeholder Engagement Practice

Toza Hudud SUE in the RK has not previously carried out the formal identification of stakeholders, i.e. all groups that the Company interacts with in the course of its activities or that may be influenced by its activities. The Company engages with stakeholders within the framework of the current legislation, namely, it engages with regulatory authorities, contractors, suppliers, and subscribers.

The Company has a permanent channel of communication for the public to address waste collection issues. Each waste truck displays the telephone number of the regional branch that serves the specific area. Any resident can call this number with complaints or questions about the work of the Company. A complaint can also be sent in writing. Citizens can also call the hotline of the President of the RoU.

The Company has developed a job description for a public relations specialist, which outlines the procedure for receiving appeals from the public. The dispatcher functions as a public relations specialist. The dispatcher records each appeal in a special logbook and opens a registered card. If a written complaint is received, it is kept in a special folder. According to a representative of Toza Hudud SUE in the RK, the majority of complaints received from the public are related to the untimely removal of MSW and construction waste. The Head of the branch or the Chief Engineer reviews the complaint, assigns the responsible person and issues an order to eliminate violations (e.g. to send a waste truck to collect construction waste). The Company's employees address the complaint and send a photo report on the

completed work through the Telegram messenger to the Company management. The dispatcher then calls back to the number from which the complaint was received to report on the elimination of the violation and confirm that works were performed accordingly.

The official procedure for handling complaints and appeals has not been developed. According to the Company, no complaints were received regarding the operation of its existing landfills.

4.2. Company's Stakeholder Engagement Experience in the Framework of the Project Development

According to the current RoU environmental legislation (**Section 2.1**), all projects entailing the construction/expansion of the MSW landfills, construction of TSs, and access roads require an EIA and subject to the SER procedure.

To date, Toza Hudud SUE in the RK has organised preparation of the first stage of an EIA (Draft EISs) for the construction of the four landfills in Nukus City and Turtkul, Kungrad, and Karauzyak districts. All four received positive SER Conclusions.

During the EIA development, the information disclosure and stakeholders' consultations did not take place (at that time this was in line with the acting legislation¹⁰). However, due to the need to update Draft EISs for the construction of all four MSW landfills in the RK to bring them in line with the considered technical solutions and the requirements of national legislation, for all four MSW landfills as Category I projects, it will be necessary to conduct public consultations within the framework of the EIA¹¹.

It should be noted that the **design solutions described in the Draft EISs for the proposed landfills significantly differ from those included in the bankable document – “Uzbekistan: Solid Waste Management in Horezm Region and the Republic of Karakalpakstan: Feasibility Study. Priority Investment Programme and Project Implementation Plan (The Republic of Karakalpakstan)”**. For example, the Draft EISs do not include composting sites, waste sorting lines, and a medical waste incinerator planned at the Nukus City Landfill.

As of early January 2022, Draft EISs for the Project's TSs and the access road to the Kungrad District Landfill have not been developed.

In general, the Company engages with stakeholders as part of its operations in line with the current RoU legislative requirements; however, the EBRD requires a more systematic approach to stakeholder engagement. The Company intends to implement this SEP to achieve compliance with the EBRD's PR10 and PR1.

¹⁰ The SER Decisions for the construction of MSW landfills in Nukus City, Kungrad, and Karauzyak districts were received in April 2020, for the Turtkul District Landfill – in September 2018. At that time, the Regulation on the State Environmental Expertise (introduced by the Resolution of the Cabinet of Ministers of the RoU of 22 November 2018 No. 949) was in force. According to the Regulation, public hearings on the planned activities should be conducted when necessary. The decision on the need for public hearings for a particular project was made by SER authorities, and this decision was expressed in instructions included in the SER Conclusion on a Draft EIS. In this case, the EIS prepared at the next stage of the EIA procedure should comprise “results of the public hearings”. However, the Regulation did not provide additional details on how and when public hearings and other public consultations should be carried out.

¹¹ Resolution of the Cabinet of Ministers of the RoU 7 September 2020 No. 541 On Further Improvement of the Mechanism of the Environmental Impact Assessment, <https://lex.uz/docs/4984499>.

5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

EBRD PR10 requires the Company to identify and document all stakeholders, namely the various individuals or groups who are more or less likely to be affected (directly or indirectly) by the Project or may have an interest in the Project.

Stakeholder identification and analysis are essential for effective stakeholder engagement, and they are both a prerequisite for EBRD financing and a recommendation of international best practice. Stakeholder identification and analysis should be carried out by the Company on an ongoing basis including based on the results of public discussions and targeted consultations.

5.1. Stakeholder Identification Methodology

The identification of stakeholders in relation to the Project was carried out based on the following criteria:

- **Impact:** the implementation of the Project may significantly affect a certain social group (stakeholders);
- **Influence:** the social group is able to significantly influence the process of Project implementation;
- **Partnership:** there are opportunities for building partnerships between the Company and the given social group; and
- **Expressed Interest:** a social group or individuals not necessarily directly affected by the Project may (or may not) show interest in it.

There are **external and internal stakeholders** of the Project. Internal stakeholders include the Project proponent, investors, management of the Project beneficiary and its staff, and contractors and suppliers for the Project and its associated facilities. External stakeholders include all other groups and individuals who are affected by the Project and / or its associated facilities or who demonstrate interest to the Project. Special attention should be paid to the organisation of external stakeholder engagement as interaction between internal stakeholders regarding the Project is carried out on a routine basis in the course of Project implementation.

5.2. Key Stakeholder Categories and Groups

This section provides a preliminary identification of the Project stakeholders for design, construction and operation stages. It should be noted that the process of stakeholder identification and analysis, as well as engagement, should continue throughout the entire lifecycle of the Project. Therefore, the list below is open and will be supplemented during the Project implementation.

The **potentially affected external stakeholders** are those on whom the Project implementation may have a direct impact; the following groups of external stakeholders are:

- A. residents of rural settlements located within the areas of direct impact of:
1. Project facilities (MSW landfills, TSs, reconstructed access road to the Kungrad District Landfill, and (re)constructed entrance roads to the MSW landfills) (settlements in the vicinity of these Project facilities) – relevant to Yengish community (Pakhtachi VCA, Turtkul District) and Karamoyin community (Berdakh VCA, Karauzyak District)¹²;

¹² There is no residential development within the areas of direct impact under standard weather conditions for proposed MSW landfills and TSs.

2. roads used for Project-related transportation (settlements crossed by the roads used to transport construction materials, structures and machinery to the Project sites (during the construction stage), and MSW between the proposed MSW management facilities (during the operation stage) - the settlements are to be determined as the construction and operation routes have not been confirmed yet;
 3. associated facilities including a) roads and OHLs to be built / reconstructed to address the Project needs (their locations are yet to be determined), and b), existing MSW landfills to be closed and remediated: according to the available information, several detached structures or houses are in 150-260 m from the sites of the existing Company's landfills in the Amudarya, Khodjeyli, Chimbay and Muynak districts;
- B. potentially affected neighbouring land users: farmers whose agricultural land (arable land and pastures) falls into the SPZs of a) *the Project facilities*¹³ (Nukus City Landfill (Bestobe MCA), Turtkul District Landfill (Pakhtachi VCA), Kungrad District Landfill (Kanly VCA), Karauzyak District Landfill (Berdakh VCA), Amudarya District TS (Urta-Kala VCA), Khodjeyli District TS (Zhana Zhap VCA), Muynak District TS (Ush Soj VCA), Kanlykul District TS (Navruz VCA), Takhtakupyr District TS (Koratereng VCA), and Chimbay District TS (Kamysaryk VCA), Beruni District TS (Sarkop VCA), Ellikkala District TS (Sarabiy Village, Dumankala VCA), and b) *associated facilities* (the existing Company's landfills that are to be fully closed (Shumanay District Landfill (Momiy VCA), Kegeyli District Landfill (Aktuba VCA) and Nukus District Landfill (Kutankul VCA)) and eight existing landfills on which the TSs are to be located);
- C. local self-government bodies: mahalla citizens assemblies (MCA) or village citizens assemblies (VCA), within the boundaries of which there are land plots allocated for the Project facilities (same administrative units as listed in point B above') and associated facilities (undefined yet);
- D. Toza Hudud SUE in the in the RK's customers in the region: residents of settlements within the Company's service area, including vulnerable groups of population: the retired, disabled people, single women, families and people with low per capita income, and other socially vulnerable groups.
- E. waste pickers / sorters:
1. at some MSW landfills, the practice of waste collection for the purpose of selection of valuable recyclable components by 'independent' waste pickers was noted; at one landfill, an organized group was observed sorting waste and collecting recyclable materials.
 2. employees of Toza Hudud SUE practicing picking recyclable materials at Company's landfills and during MSW collection by a signal method (in rural areas)¹⁴.

The following are identified among the **potentially affected internal parties**:

- Project owners:
 - GosKomEkologiya as Proponent and Project co-investor;

¹³ According to SanPiN No. 0350-17 "Sanitary Norms and Rules for the Protection of Atmospheric Air in Populated Areas of the RoU", the size of the normative SPZ of the Project facilities is 500 m for the proposed landfills and 100 m for the TSs.

¹⁴ According to a recent legal act on improvements in the waste management practices (Resolution of President of the RoU of 29 September 2020 No. PP-4845 available at <https://www.lex.uz/docs/5023690RUz>), since 1st January 2021 picking recyclables from MSW during MSW collection becomes illegal if conducted without the permission of the MSW management organisations. Therefore, picking recyclables by official and informal Company's WCS workers, by Toza Hudud SUE's staff engaged in waste collection by the signal method and, potentially, by Company's landfill workers may be classified as illegal by law since early 2021.

- Toza Hudud SUE in the RK as Project beneficiary;
- Investors:
 - EBRD as a potential investor in the Project
- Toza Hudud SUE in the RK's staff;
- potential contractors and suppliers for the Project and associated projects:
 - international consultants, national designers, and surveyors contracted to develop bankable documents, pre-design and Project documentation, as well as to conduct the necessary field studies,
 - construction firms that can be contracted for construction and installation works;
 - suppliers of materials and equipment for construction of the Project facilities and for the implementation of associated projects, etc.

Other stakeholders (those who are not directly affected by the Project but who may have an impact on or have expressed an interest in the Project) include:

- state authorities at the regional and district levels:
 - executive authorities (khokimiyats) of the districts / cities hosting Project and associated facilities;
 - Kengashes (councils) of people's deputies (of the district and city level);
- competent authorities (regional and local divisions) supervising the Company's compliance with the national legislation requirements during development and approval of the Project documentation and during Project implementation;
- local businesses including small and medium-sized enterprises working on of MSW management and recycling:
 - private recycling companies;
 - private enterprises engaged in the collection, transportation, and / or disposal of MSW in the RK¹⁵.
- Kungrad airport, located 4.78 km from the reconstructed Kungrad District MWS Landfill;
- scientific, research, and educational organisations;
- national and regional non-governmental organisations (NGOs) of environmental and social orientation;
- national, regional, and local mass media.

5.3. **Stakeholder Analysis**

The interests and / or attitudes towards the Project of the abovementioned stakeholder groups are analysed in this section.

Any stakeholder that is not included in the lists below (Table 1, Table 2) but wishes to receive information about the Project and E&S aspects of Toza Hudud SUE in the RK's operations can approach the Company (see Contacts in Section 7) with a request to be included in the stakeholders register.

¹⁵ Currently, there are also two private landfills in Nukus City: one is part of the regional waste processing cluster and is managed by ROODELL RECOVERY LLC, the second, located near Nukus is managed by Nokis Tazalik Trans LLC.

5.3.1. Potentially Affected Stakeholders

According to the EBRD requirements, the greatest attention should be paid to the **potentially affected stakeholders**. Potentially affected stakeholders include both internal and external stakeholders of the Project, and an analysis of their interests / attitudes towards the Project is presented in the table below (**Table 1**).

Table 1. Potentially Affected Stakeholders and Analysis of Their Interests / Attitudes to the Project

Stakeholders	Interests / attitudes
Residents of settlements within areas of direct impact of the Project facilities	
Residents of the settlements crossed or by-passed by the roads connecting to the Project sites/routes (during the construction stage), and the roads connecting the TSs with the proposed MSW landfills (during the operation stage) including vulnerable groups: a) families with children especially schoolchildren, the elderly and people with disabilities living in settlements crossed or bypassed by the roads; b) the elderly and people with chronic diseases whose houses are next to the roads	<ul style="list-style-type: none"> • May be affected by noise, vibration, emissions from internal combustion engines, lighting (during hours of darkness) from vehicles, an increase in the risk of road traffic accidents (RTAs) involving the transport of the Company or contractors, increased frequency of congestion on the roads leading to settlements or the roads passing through settlements (during the Project's construction and operation stages); • May be interested in: <ul style="list-style-type: none"> ○ employment opportunities¹⁶ at the Project MSW management facilities during the operation stage (applicable only to residents of the settlements located relatively close to the Project facilities); ○ receiving information about the Project and associated projects as well as their E&S impacts.
Residents of the outskirts of villages located around the MSW landfills in Turtkul District (located at ca 650 m), Kungrad District (located at ca 1230 m), and Karauzyak District (located at ca 530 m and 920 m)	<ul style="list-style-type: none"> • May be affected by visual impacts associated with the formation of embankments in waste storage areas after 5 years of landfill operation; • May be interested in: <ul style="list-style-type: none"> ○ obtaining information about the Project and its E&S impacts; ○ employment opportunities at the remediated MSW landfills.
Residents of settlements within areas of direct influence of associated facilities	
Inhabitants of suburban houses in the four villages closest to the TSs in Amudarya, Khodjeyli, Chimbay and Muynak districts, located along the access roads and / or in the construction works impacts zones	<ul style="list-style-type: none"> • May be affected by noise from vehicles and construction equipment, emissions from specialized equipment and vehicles; • May be interested in: <ul style="list-style-type: none"> ○ obtaining information about the Project and associated projects, as well as their E&S impacts; ○ employment opportunities at the Project facilities at the construction and operation stages.
Residents of settlements crossed or by-passed by i) roads and ii) OHLs to be (re)constructed to ensure Project needs, including vulnerable groups: a) families with children especially schoolchildren, the elderly and people with disabilities living in settlements crossed or bypassed by the roads;	<p>May be affected by:</p> <ul style="list-style-type: none"> ○ noise, vibration, lighting, and emissions from vehicles and construction machinery (during the construction stage); ○ visual effects related to the construction of industrial facilities and land allocation (mainly applies to the OHLs);

¹⁶ It is assumed that residents of settlements of up to 10 km from the MSW landfills and up to 5 km from the TSs may be interested in employment at the Company's facilities (during the operation phase). The area of interest can be expanded if there is a stable operation of public transport. Presumably, during the construction phase, local labor requirements will be limited.

Stakeholders	Interests / attitudes
<p>b) the elderly and people with chronic diseases whose houses are next to the roads</p> <p><u>Note: the locations of i) and ii) are yet to be determined.</u></p>	<ul style="list-style-type: none"> ○ increased risks of RTAs and frequency of congestion on the roads leading to settlements or bypass roads (during the construction and operation stages); <p>May be interested in:</p> <ul style="list-style-type: none"> ○ employment as construction workers at the roads and OHLs (re)construction sites; ○ receiving information about the Project and associated projects, as well as their E&S impacts.
Potentially affected neighbouring enterprises and land users	
<p>An enterprise with several non-residential buildings, the nearest of which are located 60 m and 80 m from the reconstructed access road to the Kungrad District Landfill, as well as users of a facility with a possible enclosure for animals.</p>	<p>May be affected by:</p> <ul style="list-style-type: none"> ○ noise, vibration, emissions from internal combustion engines, lighting (at night) from vehicles, increased risk of accidents involving the transport of the Company or contractors, temporary restrictions on the use of the road during its reconstruction; ○ visual impacts associated with the formation of a waste embankment (after the 5th year of operation of the MSW landfill). <p>May be interested in:</p> <ul style="list-style-type: none"> ○ employment opportunities at the Project facilities at the construction and operation stages; ○ obtaining information about the Project and associated projects, and their E&S impacts.
<p>Farmers whose agricultural lands are located within the areas of direct impact of Project facilities and associated facilities including facilities' SPZs.</p> <p><i>Note: The SPZs of the proposed Kungrad and Karauzyak MSW landfills and existing MSW landfills (including those that will host some of the transfer stations) comprise cultivated / arable land.</i></p>	<p>May be affected by:</p> <ul style="list-style-type: none"> ○ the restrictions imposed by the SPZ regime on the range of agricultural products (ban on cultivation of food crops); ○ reduction of the area where cultivation of food crops is prohibited (applicable to farmers whose land plots are within the SPZs of the existing MSW landfills); ○ Dust contamination of soil and noise related to construction/remediation works (applicable to farmers whose land plots are close to the Project and associated facilities) and operational works. <ul style="list-style-type: none"> ● May be interested in receiving information about the Project and associated projects, as well as their E&S impacts; ● Can be engaged during development of the Livelihood Restoration Framework and, if necessary, the Livelihood Restoration Plan.
Local government bodies	
<p>MCA and VCAs where the plots allocated for the MSW landfills: Bestobe MCA in the Nukus City, Pakhtachi VCA in the Turtkul District, Kanly VCA in the Kungrad District, and Berdakh VCA in the Karauzyak District; and the sites of associated facilities.</p> <p>Note: Heads of the MCAs, VCAs are the key source of information about the attitude of local residents towards the Project, their expectations and concerns,</p>	<ul style="list-style-type: none"> ● Assist in organising public consultations within the EIA process and act as key participants during the public consultations; ● Expect improvements of the sanitary and ecological situation; ● Awaiting the closure of the MSW management facilities that do not meet sanitary requirements; ● Potentially concerned about the permanent and / or temporary land acquisition for the purposes of the Project; additional load on the existing infrastructure (primarily on the road network) during the construction stage and, possibly, during the operation stage;

Stakeholders	Interests / attitudes
about possible proposals for the Project solutions, as well as statistical information on socially vulnerable groups and people living in potentially affected settlements.	<ul style="list-style-type: none"> Interested in timely information about the Project, its stages, and needs; Expect that when planning the Project activities, the interests of other road and infrastructure users will be considered and that the Project will provide for the local road infrastructure's upgrade and rehabilitation.
Toza Hudud SUE in the RK's customers	
Residents of the settlements within the territories covered by the Company's service, including vulnerable groups: retirees, disabled people, single mothers, large families, families / people with low income and other socially vulnerable groups	<ul style="list-style-type: none"> May be affected by the increase in tariffs for the collection and transportation of MSW, associated with the need to repay the bank loan for the construction of the Project facilities; Benefit from improving the environmental situation in the region (as a result of the closure of existing MSW landfills that do not meet sanitary requirements); Interested in receiving information about the Project and E&S impacts from its facilities.
Independent waste pickers / sorters	
Independent waste pickers / sorters engaged in extracting valuable materials from mixed MSW and selling them. Employees of the landfills of Toza Hudud SUE who extract valuable materials at the existing MSW landfills	<ul style="list-style-type: none"> Will lose income after the closure of some of the Company's existing landfills (it is assumed that this practice will not be possible at the new Company's landfills). Interested in information about the Project, stages of its implementation, employment opportunities at the new Project facilities.
Project owners	
GosKomEkologiya	Project Initiator and co-investor – interested in the effective implementation of the Project in accordance with the requirements of the national legislation and the EBRD.
Project Investor	
EBRD	<ul style="list-style-type: none"> Interested in the effective implementation of the Project in accordance with the requirements of the national legislation and the EBRD.
Management of Toza Hudud SUE in the RK	<ul style="list-style-type: none"> Interested in the Project implementation to raise funds for the modernization of the Company's landfills, as well as to increase the Company's profitability; Interested in receiving in-depth information about the Project and its stages, performance indicators.
Toza Hudud SUE's employees	
Staff of Toza Hudud SUE in the RK, in general	<ul style="list-style-type: none"> May expect salary increase, improvement of working conditions at the MSW management facilities, and improved image of work at the Company; Interested in receiving information about the Project, its stages, and decisions on ensuring safe on-site working conditions; May fear staff reductions as a result of the closure of the existing MSW landfills.
Municipal owner and personnel of the Takhiatash District Landfill	
Takhiatash District Improvement Department, in charge of the Takhiatash District Landfill	Possible loss of income source due to the municipal MSW landfill closure
Takhiatash District Landfill staff	<ul style="list-style-type: none"> Interested in obtaining information about the Project, its stages, decisions in terms of ensuring safe working conditions;

Stakeholders	Interests / attitudes
	<ul style="list-style-type: none"> May fear reductions as a result of the closure of the MSW landfill.
Contractors and suppliers for the Project and associated projects	
Potential contractors and suppliers for the Project and associated projects	<ul style="list-style-type: none"> Interested in providing consulting, field research, construction and installation works; the supply of equipment and construction materials for the needs of the Project and associated facilities; and, as a result, in receiving income; May decide to hire additional employees in connection with the conclusion of work / service contracts.

5.3.2. Other Stakeholders

Table 2 below characterizes the interests / attitudes towards the Project of *other stakeholders* of the Project who are not directly affected by the Project but are able to influence it. These interests / attitudes are all related to *external stakeholders*.

Table 2. Other Stakeholders and Analysis of their Interests in / Attitudes to the Project

Stakeholders	Interests / attitudes
National State authorities	
Centre for Comprehensive Review of Projects and Import Contracts under the Ministry of Economy and Industry of the RoU	Conducts state review of pre-project and project documentation of the investment and infrastructure projects included to the state regional development programs.
Centre for State Environmental Review of the RoU	<ul style="list-style-type: none"> Conduct SER of projects for the construction of the MSW landfills (Category I projects) (SER Centre of the RoU); determine the scope of work on the EIA of the planned activity; Interested in receiving information about the Project, its E&S performance, the impacts and risks of the Project, and the current and planned activities of the Company.
Investment Promotion Agency and the Centre for Development of Investment Projects under the Ministry of Investments and Foreign Trade	<ul style="list-style-type: none"> Interested in attracting foreign investment in the field of MSW recycling and creating joint ventures, possibly in the format of public-private partnerships with the involvement of local partners¹⁷.
State authorities of the Republic of Kazakhstan	
Karakalpak Centre for Testing and Certification SE of UzStandard Agency	<ul style="list-style-type: none"> Determines the requirements for equipment and materials that will be supplied for the needs of the Project and issues certificates of compliance.
Executive authorities: Khokimiyat of Nukus City, districts and cities' khokimiyats of the territories where Project facilities and associated facilities are located	<ul style="list-style-type: none"> Responsible for the execution of orders of the President of the RoU, approved strategic initiatives¹⁸ and any requests of the GosKomEkologiya in connection with the Project; Manage properties of RK, district, and city;

¹⁷ Agency for Attracting Foreign Investments under the Ministry of Investments and Foreign Trade. 2020. News. The President ordered to create 31 clusters for the collection and processing of waste in the regions and in the Republic of Karakalpakstan, <https://invest.gov.uz/ru/mediacenter/news/the-second-stage-of-negotiations-with-the-japanese-company-gaina-pro/> (in Russian).

¹⁸ The project is being implemented within the framework of the two strategic initiatives approved by the Resolutions of the President of the RoU: a) the State Programme for the Development of the Aral Sea Region for 2017-2021 and b) the Strategy for the Management of MSW in the RoU and the Action Plan for the Implementation of the Strategy for 2019-2020.

Stakeholders	Interests / attitudes
	<ul style="list-style-type: none"> • Expect existing problems to be resolved in the field of MSW management in the RK; • Interested in increasing the investment attractiveness of the RK as a whole and its districts; • Expect an improvement in the ecological situation in the RK and its districts due to the elimination of old landfills and the construction of modern landfills with minimal environmental impacts, as well as a reduction in the diseases incidence among the population of RK; • Agree on various permits required for the implementation of the activities of Toza Hudud SUE in the RK and the implementation of the Project¹⁹, incl. making decisions on the allotment of land plots for the construction of new facilities in the district (district / city khokimiyat), holding tenders for the provision of sanitary cleaning services in the district / city (district / city khokimiyat); • Interested in receiving information about the Project and understanding the E&S indicators of the Project, and the current and planned Company's activities.
Kengashes ²⁰ of People's Deputies (district, city) of the territories where the Project facilities and associated facilities are located	<ul style="list-style-type: none"> • Together with the khokims of the district / city, they resolve issues of planning, budgeting, property management of the district / city, use of land and other natural resources, nature protection, construction, etc.; • Interested in receiving information about the Project, its impact on the E&S indicators of settlements, the impacts and risks of the Project, and the current and planned activities of the Company.
Government authorities, incl. supervision and control authorities (regional and their district / city divisions)	
<p>Committee on Ecology and Environmental Protection of the RK (RK CEEP) and district/city Departments of Ecology and Environmental Protection;</p> <p>RK Emergency Services Department, district/city Emergency Services Departments;</p> <p>RK Centre for Sanitary and Epidemiological Welfare, district/city Centres for Sanitary and Epidemiological Welfare;</p> <p>RK Forestry Committee;</p> <p>RK Department of Public Health, district Divisions of Public Health;</p> <p>RK Ministry of Water Resources</p> <p>RK Main Employment Department, district/city</p>	<ul style="list-style-type: none"> • Conduct monitoring over Toza Hudud SUE in the RK's activities and compliance of its facilities with the requirements of the national legislation; • Issue various permits required for the implementation of the activities of Toza Hudud SUE in the RK and the Project implementation (including land allocation); • Interested in Toza Hudud SUE in the RK compliance with the E&S requirements of the RoU legislation; in the elimination or minimization of inconsistencies between the MSW management system and national legislation; • Expect improvements of the ecological situation in the RK and districts due to the closure of the old

¹⁹ The competence of a district / city Khokim includes issues of planning, budgeting, property management of the district / city, use of land and other natural resources, nature protection, construction, etc. (article 25 of the Law of the RoU No. 913-XII of 2 September 1993 on Local Government Authority, <https://lex.uz/ru/docs/112168>).

²⁰ The Kengash of People's Deputies and the Khokim ensure the implementation of the tasks of social and economic development common for the district and the city; the implementation of laws, decisions of the chambers of the Oliy Majlis, and acts adopted by the President and the Cabinet of Ministers, RK state authorities etc. (Law of the RoU No. 913-XII of 2 September 1993 on Local Government Authority, <https://lex.uz/ru/docs/112168>).

Stakeholders	Interests / attitudes
<p>Centres for Population Employment Assistance (including State Labour Inspectors and district/city Centres for Population Employment Assistance);</p> <p>RK Ministry for Support of Mahallas and Families, district/city Divisions for Support of Mahallas and Families;</p> <p>Department for Cultural Heritage of the RK Ministry of Culture, regional division of the Agency of Cultural Heritage under the RoU Ministry of Tourism and Sports, district/city Divisions of Culture</p>	<p>landfills and (re)construction of modern landfills with minimized environmental impacts, as well as a diseases reduction among the RK's population;</p> <ul style="list-style-type: none"> • Expect improvements in the medical waste management situation in the RK; • Interested in receiving information about the Project and its E&S performance, impacts and risks of the Project, and the current and planned Company's activities.
<p>RK Centre for State Environmental Review</p>	<ul style="list-style-type: none"> • Conducts SER for the Category III-IV projects (planned TSs), determines the scope of work on the EIA of the planned activity; • Interested in receiving information about the Project, its E&S performance, the impacts and risks of the Project, and current and planned Company's activities.
<p>Kungrad Airport</p>	<p>Interested in receiving information about the Kungrad District Landfill and its E&S impacts.</p>
Local businesses incl. small and medium businesses in the field of MSW management	
<p>Private recycling companies²¹, including the regional waste processing cluster ROODELL RECOVERY LLC</p>	<ul style="list-style-type: none"> • Are potential consumers of the products of the proposed WSPs; • May be interested in organising waste collection at WCSs to increase the share of recycled waste; • Interested in receiving information about the Project, its stages, capacities of the proposed facilities, etc.
<p>Private enterprises engaged in the collection, transportation, and / or disposal of MSW in the RK, including:</p> <ul style="list-style-type: none"> • Nukus Tozalasch LLC, • MYNBAY NUKUS SERVICE LLC, • KURBANBAY COMMUNAL SERVICE • ROODELL RECOVERY LLC (regional waste processing cluster), • Nokis Tazalik Trans LLC, which manages the landfill near Nukus City 	<ul style="list-style-type: none"> • Can supply waste to the Company's MSW landfills; • Compete with the Company for contracts on sanitary cleaning of the territories of districts/cities, and for the waste volumes of collected waste for subsequent sorting; • Interested in receiving information about the Project, its stages, the capacities of the proposed facilities, cooperation opportunities etc.
Non-profit organisations	
<p>Scientific, research, and educational organisations (universities and schools)</p>	<p>May be interested in:</p> <ul style="list-style-type: none"> • receiving objective information about the state of the natural and social environment in the Project area and its changes during the Project implementation; • the opportunities provided by the Project for environmental education of schoolchildren and students, e.g. the Project may demonstrate approaches to MSW management in line with good international practice (for example, through

²¹ In the RK, as well as in other regions, it is planned to create clusters for the collection and processing of waste. <https://invest.gov.uz/ru/mediacenter/news/the-president-instructed-to-create-31-clusters-for-the-collection-and-processing-of-waste-in-the-regions-and-the-republic-of-karakalpakstan/>.

Stakeholders	Interests / attitudes
	excursions to the proposed facilities), <ul style="list-style-type: none"> • organising training programs for Company employees, incl. those related to the Project implementation; • potential job opportunities for their graduates during construction and / or operation of the proposed facilities
National NGOs of environmental and public orientation, incl. <ul style="list-style-type: none"> • Aral-Dialogue Association - collection and dissemination of information, biodiversity, ecological education, legislative initiatives; • Karakalpakstan Environmental Union – environmental policy; • Atamakan Charitable Foundation - environmental education; • Kvat NGO - ecological, social and economic improvement; • Shagala Karakalpak Centre for Environmental Education - environmental education; other²². <i>Note:</i> the list of NGOs that may express interest in the Project, incl. those that represent the interests of ethnic minorities and socially vulnerable groups will be updated as needed at the later stages of the Project implementation	May be interested in: <ul style="list-style-type: none"> • monitoring the progress of Project implementation and tracking if their opinions / suggestions on the Project are taken into account; • positive environmental and social changes associated with the Project implementation.
National, regional, and local mass media	May be interested in cooperating with the Company on coverage of the Company's activities in the media as well as in informing the general public and other Project stakeholders.

6. STAKEHOLDER ENGAGEMENT PROGRAMME

The Stakeholder Engagement Programme (**Table 3**) is designed to ensure the most effective engagement with all identified stakeholders, to create and maintain respectful relations between the Company and stakeholders, and to prevent possible conflicts.

The Programme covers the design and construction stages of the proposed facilities (2022 – 2025) and should be revised and updated at least within one year after beginning of the construction stage and then prior to commissioning the Project facilities. It provides a specific action plan with the distribution of responsibilities and a timeline for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should also be updated.

In case of adverse circumstances (epidemic or pandemic), all events requiring gatherings / major meetings should, if possible, be conducted online using alternative engagement

²² RECCA. 2003. Directory. Environmental NGOs in Central Asia. NGOs of Uzbekistan, p.81. <https://carececo.org/upload/1.pdf>.

methods (see **Section 2.2** and the Stakeholder Engagement Programme below). The overall responsibility for the delivery of the Programme and the entire SEP rests with the Company²³.

²³ To ensure effective implementation of the SEP it is recommended to assign a person within the Company's management with a responsibility to manage SEP implementation. This responsible person should be supported by two assistants from the Company staff working on stakeholder engagement issues parttime. As the Company has limited experience in terms of stakeholder engagement, the staff that will be responsible for the SEP delivery and maintenance of the grievance mechanism should be trained on Bank's requirements on and approaches to stakeholder engagement.



Table 3. Stakeholder Engagement Programme

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
1.	Stakeholder engagement activities within the Project Development					
1.1.	<p>Prepare and disclose the required EIA materials for each Project facility:</p> <ul style="list-style-type: none"> for the MSW landfills (Category I) for the TSs (Category III) for the access road to the Kungrad District Landfill (presumably Category III) <p><i>Note:</i> By national legislation, the disclosure of EIA materials is compulsory only for Category I facilities. However, the Company will disclose some EIA materials for Category III facilities as well</p>	All stakeholders	<p>EIA Materials</p> <p>EISs, non-technical summaries (NTSs)</p> <p>Draft EISs, NTSs</p> <p>Draft EIS, NTS (to be confirmed after assigning the impact category to the access road)</p>	Design stage	Toza Hudud SUE in the RK	<p>Electronic versions of the EIA materials – to be disclosed at the official website of GosKomEkologiya / the RK CEPP (http://www.uznature.uz/yz/invest/51#2 and http://www.uznature.uz/yz/legislation/ondata?legislationCategoryId=9),</p> <p>Paper versions of the EIA materials for each landfill – to be placed at the republican office of Toza Hudud SUE and its district branches in Nukus City, and Turtkul, Kungrad, and Karauzyak districts, and at offices of heads of Bestobe MCA in Nukus City, Pakhtachi VCA in Turtkul District, Kanly VCA in the Kungrad District, and Berdakh VCA in Karauzyak District</p> <p>Notification on disclosure of EIA Materials – to be published at district/city/republican newspapers, TV news broadcasts, news web portals, at the GosKomEkologiya’s website, and at the official webpages of district khokimiyats</p>

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
1.2.	Collect and analyse comments and suggestions received from stakeholders on the disclosed EIA materials	All stakeholders	Logs of received comments / suggestions Minutes of public hearings on proposed landfills Minutes of meetings with heads of MCAs and VCAs	Within the framework of the EIA procedures for the Project facilities The findings of the analysis to be included into the regular reports for EBRD	Toza Hudud SUE in the RK	Comments and suggestions on the EIA Materials – to be collected via: a) logs of received comments / suggestions at the places where paper versions of EIA Materials are disclosed, b) from dedicated email, c) 'Ask Question' form at the GosKomEkologiya's website
1.3.	Hold public hearings on the proposed construction of MSW landfills: the Nukus City and Turtkul, Kungrad, and Karauzyak District landfills	All stakeholders with focus on residents of the affected settlements	EISs, NTSSs, notifications on the public hearings, Company's presentations for the public hearings based on NTSSs (with a section on review of public comments and suggestions on the disclosed EIA Materials)	Design stage	Toza Hudud SUE in the RK, district khokimiyats	Notifications on public consultations – to be posted on the official webpages of district khokimiyats, in district / city newspapers, on TV news channels, news web portals, on the GosKomEkologiya official websites Date – no later than 20 days before the hearings date
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>In agreement with the GosKomEkologiya and taking into account the instructions of the Ministry of Health of the RoU / RK Ministry of Health determine an alternative to hearings, for example, an electronic survey or an electronic discussion supported by paper copies of survey to allow stakeholders to submit comments</i>				
1.4.	Take into account comments and suggestions on EISs of MSW landfills projects received from stakeholders	Stakeholders	EISs, NTSSs, Protocols of the Public Hearings (on EIA Materials for MSW landfill projects)	During the discussion of the EISs and revision of EISs before submission to SER	Toza Hudud SUE in the RK, SER Centre at GosKomEkologiya	

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
2.	Disclose information about the planned activities within the framework of the Project in the mass media, indicate contacts for feedback	Potentially affected and other stakeholders	Notifications, mass media information, press releases / bulletins as news become available	Within 1 month of the Loan Agreement becoming effective	Toza Hudud SUE in the RK	Information boards in offices of heads of MCAs/ VCAs of potentially affected settlements (per lists A and B, Section 5.2), mass media (city and district newspapers, news web portals, webpage of GosKomEkologiya
3.	Disclose the package of documents prepared as part of the bankable ESA	All stakeholders	SEP, NTS of the ESA Report, Livelihood Restoration Framework Livelihood Restoration Plan	Prior to the Loan Agreement signing Livelihood Restoration Plan is to be developed and disclosed prior to the construction at those Project sites that are covered in this Plan	Toza Hudud SUE in the RK	Electronic versions of the documents – to be disclosed on the website of the GosKomEkologiya. Paper versions of the documents – to be placed at the regional office of Toza Hudud SUE in the RK and its district branches, offices of heads of MCAs/VCAs per lists A1 and B, Section 5.2 , and in other potentially affected settlements due to construction and operation traffic (list A2 in Section 5.2) that will be determined as the Project progresses in consultations with RK CEEP and district khokimiyats
4.	Within 30-60 days of disclosure of the above documents, undertake the following: <ul style="list-style-type: none"> for MSW landfills – public meeting and distribution of questionnaire to gather feedback from residents of affected settlements for TSs - conduct meetings with the "street heads" in the mahallas hosting the TSs and present project information 	All stakeholders with focus on residents of the affected settlements	SEP and NTS of the ESA Report, Livelihood Restoration Framework	As noted to the left	Toza Hudud SUE	Personal meetings

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
5.	Develop a set of Frequently Asked Questions and Answers regarding the Project	All stakeholders	FAQ documents	Prior to the Loan Agreement signing	Toza Hudud SUE	Paper versions of the document – to be placed at the offices of Toza Hudud SUE and its district branches, offices of heads of MCAs/VCAs of potentially affected settlements (lists A1 and B in Section 5.2)
6.	Ensure the availability of/access to sample grievance and suggestion forms	Local residents and any stakeholders	Sample forms for filing grievances	With disclosure of the SEP	Toza Hudud SUE, contractors	Public Visitor Centres at the offices of Toza Hudud SUE and its district branches Offices of the heads of MCAs/VCAs of potentially affected settlements (lists A1 and B in Section 5.2)
7.	Open Public Visitor Centres for the implementation of the Project in each district and publish information about their opening	Stakeholders	SEP, NTS of the ESAA Report, Livelihood Restoration Framework, maps / information about the Project	Within 1 month of the Loan Agreement becoming effective – for the construction period	Toza Hudud SUE in the RK	Offices of Toza Hudud SUE in the RK and its district branches where the Project facilities are located (lists A1 and B in Section 5.2)
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>It is possible to launch a hotline and provide any requested information via WhatsApp / Telegram chat, Facebook / Twitter, posting on the GosKomEkologiya website</i>				
8.	Hold meetings with heads of MCAs, VCAs potentially affected by the transportation of construction materials and MSW	Heads of MCAs, VCAs of potentially affected settlements	NTSs of EISs for the proposed MSW landfills, NTSs of Draft EISs for the TSs, and presentations developed on their basis	Upon development of goods transportation schemes for the Project	Toza Hudud SUE in the RK	Offices of heads of MCAs/VCAs of potentially affected settlements (the list – to be clarified) (list A2 in Section 5.2)

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
9.	Disclose and implement the grievance mechanism (see Section 7) and publish the contact details of the person responsible for its implementation on the Company's official website	Potentially affected groups Stakeholders	Notification, information bulletins	Disclose and start implementing at the design stage and maintain throughout the Project	Toza Hudud SUE in the RK	GosKomEkologiya's website, offices of Toza Hudud SUE and its district branches, offices of heads of MCAs/VCA of potentially affected settlements (per lists A and B in Section 5.2)
10.	Appoint a person at the regional office and assistants at the district branches who will be responsible for the implementation of the SEP and grievance mechanism	Stakeholders	Notification, information announcement	Within 1 month of the Loan Agreement becoming effective	Toza Hudud SUE in the RK	GosKomEkologiya's website, offices of Toza Hudud SUE in the RK and its district branches
11.	Organisation of round tables, briefings, on-line conferences, and presentations with the participation of representatives of the EBRD, GosKomEkologiya, and District Khokimiyats (where necessary and where interest is demonstrated)	Stakeholders	A package of documents on bankable ESA, and national design documents, Draft EISs, EISs and their NTSS, SECs, (developed as part of the EIA process)	Before the start of construction work and, as necessary, before the operation stage	GosKom-Ekologiya Toza Hudud SUE in the RK	Offices of the City and District Khokimiyats, The RK CEEP office
12.	Conduct focused consultations with affected parties and / or individuals (e.g. potentially affected farmers)	Potentially affected stakeholders	Information about the planned activity	Identification of affected individuals – as early as possible as part of Livelihood Restoration Plan development; basic consultations – before the start of construction work, then when necessary (for example, as part of the implementation of livelihood restoration measures)	Toza Hudud SUE in the RK	Potentially affected land or assets users (per list B in Section 5.2), offices of Toza Hudud SUE in the RK and its district branches

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
13.	Notify about the start of construction work in the framework of the Project	Affected and other stakeholders	Notification, information bulletins	At least one month before the start of construction work	Toza Hudud SUE in the RK, contractors	GosKomEkologiya's website, information boards in potentially affected settlements (lists A1 and B in Section 5.2), at construction sites of the Project facilities and / or in the offices of heads of MCAs/ VCAs of potentially affected settlements (lists A1 and B in Section 5.2)
14.	Conduct information presentations / trainings on MSW management	Local residents, schools	Presentation materials	For the first time – within 12 months of the Loan Agreement becoming effective, then once a year	Toza Hudud SUE in the RK, Centre for sanitary treatment	Potentially affected settlements (lists A1 and B in Section 5.2), public visitor centres at the offices of Toza Hudud SUE in the RK and its district branches, GosKomEkologiya's website
15.	Inform the population beforehand about the transportation routes and train them on road safety requirements for the period of construction and operations works	Local residents, school-children	Presentation materials	At least one month before the start of construction works; prior to operations	Toza Hudud SUE in the RK, Traffic Safety Authorities	Offices of the heads of MCAs/VCAs of potentially affected settlements, Schools (list A2 in Section 5.2), GosKomEkologiya's website
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>Distribute training materials via e-mail, phone calls, social networks: WhatsApp / Telegram chat, Facebook / Twitter, GosKomEkologiya website</i>				
16.	Place information boards at construction sites and in settlements with the contact details for communication regarding issues related to the Project	Local residents	Information boards	At least one month before the start of construction works	Toza Hudud SUE in the RK, contractors	Potentially affected settlements (lists A1 and B in Section 5.2)

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
17.	Ensure the availability of/access to sample grievance and suggestion forms	Local residents and any stakeholders	Sample forms for filing grievances	Before the start of construction works	Toza Hudud SUE in the RK, contractors	Construction sites of the Project facilities Public Visitor Centres at the offices of Toza Hudud SUE in the RK and its district branches Offices of the heads of MCAs/VCA's of potentially affected settlements (lists A and B in Section 5.2)
18.	Keep a record of the received proposals and grievances in special logs, providing feedback on each appeal	Affected and other stakeholders	Log (register) of grievances and proposals	During the entire Project lifecycle	Toza Hudud SUE in the RK, contractors	Grievance and Proposal Register kept at Toza Hudud SUE in the RK's office
19.	Conduct thematic meetings with the public on issues of interest to them related to the Project (changes in tariffs and benefits, schedule and rules for the collection and transportation of MSW, scheme for transportation of construction materials, scheme for MSW transportation, on bypass routes during construction and peak loads during operation)	Local residents, potentially affected stakeholders	Information leaflets, maps, specific information depending on the information needs of potentially affected stakeholders	During the entire life cycle of the Project, as necessary and as the Project is developed	Toza Hudud SUE in the RK and its district branches	The location of the meetings depends on the nature of the issue and the location of the specific stakeholders
	Proposed alternative activities taking into account COVID-19 restrictions:	<i>Conduct thematic meetings in a remote / online format (video and chat conferences, live broadcasts, etc.)</i>				
20.	Review and update the SEP based on the assessment of its effectiveness, information needs of stakeholders, and other changes that require revision of methods / frequency of stakeholder engagement	All stakeholders	Updated SEP	Regularly throughout the entire Project life cycle	Toza Hudud SUE in the RK	GosKomEkologiya's website

No.	Activity	Target Group	Information Materials	Timeframe	Responsible side	Location
21.	Prepare annual reports on the E&S performance of the Project	EBRD	Report as per the Bank's format	Once a year during the entire Project life cycle	GosKomEkologiya, Project Implementation Unit, Toza Hudud SUE in the RK	

7. GRIEVANCE MECHANISM

The proposed grievance mechanism, introduced by Toza Hudud SUE in the RK, will meet both the requirements of the legislation of the RoU²⁴ as well as the requirements of the EBRD. It will allow affected and other stakeholders to submit a proposal or grievance regarding the Project, including related E&S issues. This mechanism will ensure the prompt and effective resolution of problematic issues, taking into account the principles of transparency and respect for the cultural traditions of the territory of the Project implementation.

Prior to commencement of construction work on the Project, the Company will inform all stakeholders about the grievance mechanism. Grievances and suggestions can be addressed to the representative of the Company who is responsible for their consideration and resolution. The contact details of the representative are listed below:

Name: Saparov Abdirakhman Danabaevich
Position: Chairman of the Committee for Environmental Protection and Ecology of the Republic of Karakalpakstan
Address: 230100, Nukus, Berdakh highway w / n
E-mail: rktabiat@exat.uz nukus@uznature.uz
Phone: +(361) 224-19-51, +(361) 224-08-77

Grievances and proposals can be submitted to the Company in writing using the Sample Grievance Form provided in **Appendix 1**. Such forms will be published in electronic format on the Company's website after it has been created, and they will also be available in printed form near the boxes for grievances and appeals located in the offices of the heads of MCAs, VCAs, district branches of Toza Hudud SUE in the RK, at the Project construction sites, etc.

Grievances received by phone, e-mail, mail, text messages (SMS), or messages in instant messengers will also be registered and considered. Grievances can also be submitted anonymously; however, it is recommended that contact details be provided so that the Company can provide a written response to the sender of the grievance.

According to the legislation of the RoU, appeals and grievances are considered within 15 days from the date of their receipt; however, if necessary, this period can be extended to one month provided that the sender of the appeal / grievance is informed of the extension²⁵. The prepared response is approved by the head of the Company and sent to the sender of the appeal / grievance.

The Company will maintain a Grievance (and Proposals) Log, which will record all grievances regarding the Project throughout the entire life cycle. The following information should be recorded in the Log:

- The essence of the received grievance / proposal / appeal;
- Date of application;
- Contact information of the sender (if the complaint was not submitted anonymously);
- Description of the actions taken (investigation, corrective action, preventive action, etc.);
- Date of decision making and closing / providing a response to the sender;
- Details of the sender's consent / disagreement with the decision and measures taken.

²⁴ The Law of the RoU of 11 September 2017 No. ZRU-445 On Amendments and Additions to the Law of the RoU on Appeals of Individuals and Legal Entities, <https://lex.uz/docs/3336171>

²⁵ See above.

8. MONITORING, ASSESSMENT, AND REPORTING

The successful implementation of the SEP depends on the continuous monitoring, assessment, and reporting of its implementation.

The Company will appoint personnel responsible for organising, implementing, monitoring, assessing, and reporting on stakeholder engagement activities.

To ensure the monitoring and effectiveness assessment of stakeholder engagement, the following set of key indicators has been identified:

- SEP has been developed and published for review and comments;
- SEP is updated as comments and suggestions are received;
- All planned activities envisaged by the Stakeholder Engagement Programme have been completed in full and on schedule;
- Minutes of public hearings / discussions are drawn up and disclosed;
- Grievances and proposals from stakeholders regarding the Project received by the Company (and contractors) are recorded (disaggregated by gender of the sender) and tracked until they are resolved;
- The main categories of grievances received and how they were received;
- Contracts with contractors include clauses providing for the fulfilment of the relevant requirements of the SEP;
- The number of grievances resolved within the acceptable time frame and the number of grievances remaining unresolved;
- Annual reports on the implementation of the SEP and handling of grievances.

In order to improve the effectiveness of the SEP, it is necessary to periodically assess and adjust the SEP in accordance with the changed circumstances and information needs of stakeholders. The SEP will be updated at least one year after the start of construction and before the Project facilities are put into operation; each updated version will determine the future frequency of SEP updates. If changes and additions are made to the SEP, the updated version will be disclosed.

The results of the stakeholder engagement process will be analysed monthly and quarterly, and a summary of the analysis will be included in the annual E&S reports submitted to the EBRD.

APPENDIX 1. SAMPLE GRIEVANCE FORM

Reference No. (for internal purpose only)

Full name: Name _____

Surname _____

I wish to submit my grievance anonymously

I request not to disclose my identity and contact details without my consent

Contact Details
Please mark how you wish to be contacted (mail, telephone, Telegram, e-mail)

By Post: Please provide mailing address:

By telephone: _____

By e-mail: _____

Preferred Language for Communication

Uzbek
 Russian
 Other, please specify _____

Grievance Description

Date of Incident / Grievance

One-time incident / grievance (date _____)
 Happened more than once (how many times?) _____)

Ongoing (currently experiencing the problem)

What measures would you like to propose to solve your problem?

Signature:

Date:
