

Environmental and Social Monitoring Report

Project Number: 52224-001
Annual Report 2021
February 2022

Kazakhstan: Total Eren Access M-KAT Solar Power Project

Prepared by M-KAT Green Limited Liability Partnership for the Asian Development Bank.

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M-KAT SOLAR POWER PLANT

ANNUAL ENVIRONMENTAL & SOCIAL REPORT

This report includes the required answers to the questionnaire and the Environmental and Social Action Plan implementation status with the supporting documents numbered according to the action they support.

1. COMPANY DETAILS

Client Name:	M-KAT Green
Client Address:	Kabanbay Batyr Avenue, 15A, Nur-Sultan city, 010000
Country:	The Republic of Kazakhstan
Client authorized representative:	I certify that, to the best of my knowledge and belief, the information contained in this report is true, complete and correct in all material respects and does not omit any material fact necessary.
Signature:	Thierry Plaisant, General Director
Date:	25/02/2022
Contact Details:	Telephone: +7 771 110 8239 Mobile: +7 771 110 8239 E-mail: thierry.plaisant@total-eren.com
Reporting Period:	2021
Unless otherwise stated, the information provided below is for this reporting period only.	

PART A. CORE QUESTIONS

2. PROJECT UPDATE

Project Name (As given in the Project Legal Documentation):	M-KAT Solar Power Plant
Project OP ID (As given in the Project Legal Documentation):	50025
Please provide a summary update on the project implementation. If the project includes production or manufacturing please also include :	The project is in operation phase

3. ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP) STATUS UPDATE

Using the guidance provided below, please provide an ESAP status update as an attachment to the Annual Environmental & Social Report. Please use the template provided under Annex 1 for the update. The ESAP for the Project is included in the Legal Documentation.

For each ESAP action item, please complete the two steps below and note under the ESAP Status column:

1. Interpret your implementation status using the below guidance:

Exceeding Target (ET):

The project has gone beyond the requirements of the defined ESAP target and evaluation criteria within the defined timeframe.

Achieved Target (AT):

The project has achieved the ESAP action targets and fulfilled the evaluation criteria within the defined timeframe.

On Target (OT):

The project is on target for achieving ESAP action targets and fulfilling the evaluation criteria within the defined timeframe.

Minor Delay (MD):

The project has not achieved the ESAP action targets within the defined timetable but has put systems, processes, or mitigation measure in place, which are working towards addressing the deficiencies within a reasonable timeframe. In such case, please specify the new target date.

Significant Delay (SD):

No significant progress has been made towards achieving the ESAP action targets within the defined timeframe. In such case, please specify the new target date.

Not Applicable yet (NA):

The defined ESAP action is not applicable yet, e.g., if the project is currently at design stage and the defined ESAP action will be applicable only during the operational stage.

2. Comment on implementation status: Provide a brief commentary on the chosen status. For actions with delays or changes, explain the reasons for the delay or changes, actions planned to meet the requirements and estimated completion date for the action. Please note that any material change to the action plan(s) or deadlines agreed with the Bank must be satisfactory to the Bank.

4. GENERAL

4.1. Have any new environmental, social or gender ¹ issues been identified which were not foreseen by or contemplated in the Environmental and Social Action Plan?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.2. Have there been any accidents or incidents that have caused damage to the environment, affected cultural property, or created liabilities for the Client?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.3. Have there been any suspensions, closures, penalties, fines and/or corrective action plans imposed by environmental, health and safety, labour authorities on the Company or the Contractors?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.4. Have there been any exceedances of the emission and discharge standards that apply to the project (either by regulation or as defined under the ESAP / ESMP/ EU Directives)?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
4.5. Have there been any court cases filed or determined against the Client in the reporting period that are related to labour, health and safety, environment, land acquisition, damage to third party assets, etc.?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

¹ Within the Bank's Environmental and Social Policy, "social" refers to those issues which pertain to project-affected people and their communities and workers and related to socioeconomic status, vulnerability, gender identity, human rights, sexual orientation, cultural heritage, labour and working conditions, health and safety and participation in decision making.

5. HUMAN RESOURCES MANAGEMENT

Unless otherwise noted, the questions in this section apply to both direct employees and non-employee workers (e.g. contractors and other 3 rd party employees working on the project site or performing work directly related to the core functions of the project).			
	Total	Recruited in the reporting period	Dismissed in the reporting period
Number of direct employees:	Men: 5 Women: 5	Men: 0 Women: 2	Men: 0 Women: 0
Number of contracted workers:	Men: 78 Women: 5	Men: 0 Women: 0	Men: 0 Women: 0
Number of seasonal / temporary workers:	Direct Employees: Men: 0 Women: 0	Contracted Workers: Men: 31 Women: 6	Men: 0 Women: 0
Number of employees:	International (%) 2	National (%) 98	Local (%) ² 42
5.1. Were there any collective dismissals as defined in article 1 of EU Directive 98/59 ³ and/or as defined in the national labour code affecting the directly employed workforce during the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.2. Are any collective dismissals planned for the directly employed workforce in the next year?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.3. Were there any changes to: <ul style="list-style-type: none"> worker representation at Client facilities? status of collective agreements? 			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.4. Have workers raised any grievances concerning the project, Client, or contractors including working conditions or any type of discrimination, harassment or bullying during the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
5.5. Have there been any strikes or other collective disputes related to working conditions at the Client in the reporting period?			Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

6. HEALTH AND SAFETY (H&S) DATA

6.1	<p>Please provide information on any accidents / incidents that have happened to employees, contractors or other third parties during the reporting period? Please confirm circumstances, severity of the accident (fatal, serious, minor etc.), status of investigation and remedial action taken.</p> <p>No incident has been recorded during 2021.</p>
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² From directly affected/neighbouring communities

³ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0059&from=EN>

6.2	<p>Please provide information on the H&S training provided to employees or contactors during the reporting period? Please provide the training topics and the numbers of workers that have been trained.</p>																								
<table border="1"> <thead> <tr> <th data-bbox="289 247 678 310">Trainings</th> <th data-bbox="678 247 1393 310">Number of workers trained</th> </tr> </thead> <tbody> <tr> <td data-bbox="289 310 678 373">1. Electrical Safety</td> <td data-bbox="678 310 1393 373">16</td> </tr> <tr> <td data-bbox="289 373 678 436">2. Fire Safety</td> <td data-bbox="678 373 1393 436">81</td> </tr> <tr> <td data-bbox="289 436 678 499">3. OHS</td> <td data-bbox="678 436 1393 499">16</td> </tr> <tr> <td data-bbox="289 499 678 562">4. Industrial Safety</td> <td data-bbox="678 499 1393 562">6</td> </tr> <tr> <td data-bbox="289 562 678 625">5. First Aid</td> <td data-bbox="678 562 1393 625">8</td> </tr> <tr> <td data-bbox="289 625 678 688">6. Anti-terror</td> <td data-bbox="678 625 1393 688">15</td> </tr> <tr> <td colspan="2" data-bbox="289 699 1393 741"> </td> </tr> <tr> <th data-bbox="289 741 678 804">Drills</th> <th data-bbox="678 741 1393 804">Number of workers involved</th> </tr> <tr> <td data-bbox="289 804 678 867">1. Evacuation</td> <td data-bbox="678 804 1393 867">15</td> </tr> <tr> <td data-bbox="289 867 678 930">2. Fire Fighting</td> <td data-bbox="678 867 1393 930">15</td> </tr> <tr> <td data-bbox="289 930 678 993">3. Security</td> <td data-bbox="678 930 1393 993">62</td> </tr> </tbody> </table>		Trainings	Number of workers trained	1. Electrical Safety	16	2. Fire Safety	81	3. OHS	16	4. Industrial Safety	6	5. First Aid	8	6. Anti-terror	15			Drills	Number of workers involved	1. Evacuation	15	2. Fire Fighting	15	3. Security	62
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6.3	<p>Please provide information on the number of H&S inspections / audits which have been carried out during the reporting period? Please confirm if these were carried out by the Client or by an independent OSH expert and if any actions are outstanding.</p> <p>Some H&S inspections were carried out in 2021 :</p> <ul style="list-style-type: none"> - Regular audits carried out by the HSE manager of the Maintenance Contractor (TESK) : PV & HV sections of the plant on 27/08/2021, PV section on 30/04/2021 and HV section & Security company on 30/09/2021 - An independent expert organization conducted a Risk Assessment in the field of labour legislation of the Republic of Kazakhstan in October 2021. 																								
6.4	<p>Major developments and achievements related to H&S management during the reporting period: new safety measures, safety awards / initiatives.</p> <p>In 2021, the O&M subcontractor, Metka hired a local HSE manager for the 2 O&M contracts in Kazakhstan. This reinforcement in the operational organization allowed to introduce new procedures in relation with H&S topics and aims to conduct some actions as :</p> <ul style="list-style-type: none"> - E&S Management Plans and technical documentation have been revised in accordance with local legislation - A risk assessment in the field of labour legislation for PV & HV contractors was conducted - The workplaces for PV & HV were certified - Some repair works were carried out mainly for the central road of the Plant - Mandatory training against terrorism were developed with support of the local competent authorities. 																								
6.5	<p>Please provide information on the road traffic collisions that have happened to employees or contactors during the reporting period including the number of accidents, fatalities, major injuries, minor injuries, damage only and the investigative process undertaken. Summarise remedial action taken.</p> <p>No road traffic incidents have been recorded in 2021.</p>																								

7. STAKEHOLDER ENGAGEMENT

7.1 Please provide information on the implementation of the stakeholder engagement plan agreed with the Lenders and summarise interaction with stakeholders during the reporting period, including:

- meeting or other initiatives to engage with members of the public or public organisations, civil society, communities, including vulnerable groups during the report period. Please describe how you have made such meetings and interactions accessible to both men and women of all ages, all social groups, and those who speak minority languages.
- Summarise any coverage in media on environmental, health and safety and social issues related to the project, and,
- interaction with any environmental or other community groups.

Regular meetings and consultations have been held with representatives of the local administration, both in the Shu city and the nearest settlement of Alga to maintain constant contact with local communities.

Please describe any changes to the Stakeholder Engagement Plan:

No changes were made in the Stakeholder Engagement Plan during 2021.

7.2 How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group and by issues and provide status update on % of resolved and unresolved complaints. Summarise main issues raised in the complaints or grievances and explain how they were resolved:

During the watering season of private gardens, a verbal grievance was received from villagers about the lack of water pressure in the nearby village caused by a site water pump sucking directly from the public water network. The Maintenance Operator took immediate corrective measures to eliminate the problem:

- Modification of the connection to the municipal water network by supplying an internal tank by gravity.
- Water saving measures in the Northern camp for accommodation of the security company which achieved to divide by more than 3 the water consumption of the camp.

No new complaint from local villagers has not been received after implementation of the below measures.

7.3 What information on environmental and social issues was put in the public domain during the reporting period? Please attach a copy or the link.

No information on environmental and social issues was put in the public domain during the reporting period. The project NTS, SEP, SEP and ESAP are still present on the Total Eren's website.

<https://www.total-eren.com/en/m-kat-solar-plant/>

Is the project Categorised A by the EBRD?

No:

PART B

QUESTIONS FOR PROJECTS WITH SPECIFIC CONDITIONS

8. WATER USE AND EFFICIENCY

Does the project involve production or manufacturing with a high-water demand (greater than 5,000 m ³ /day)?		Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Total volume of water drawn from water source(s) in m ³ during the reporting period	1,560 m ³	
Total volume of potable water drawn from water source(s) in m ³ during the reporting period (if available)	1,400 m ³	
Total units of production/manufacturing (please define the units in the response)	No production	
Water source (well, water network, etc.)	Potable water is supplied from the municipal network. Additional water is transported from another source mainly for panels cleaning.	

9. GREENHOUSE GAS (GHG) EMISSIONS

Are the direct and indirect ⁴ GHG emissions of the project more than 25,000 tonnes/year CO ₂ -equivalent?	No: <input checked="" type="checkbox"/>
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10. LAND ACQUISITION

Was there any land acquisition associated with the project during the reporting period?

For the construction of a major motorway along the Plant site, the state enterprise KazAvtoZhol JSC received 5 hectares of land from the Northeast side of the facility, in exchange for which a similar plot of land from the Western side was received. The exchange has been registered with the local department of land cadastral registration.

2 land leases for a period of 3 years were issued for the land plots of the Northern Camp (1.6 hectares) and for the communication cable between the site and the local Kazakhtelecom center .

Yes: No: If yes, please provide answer to the following:

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Number of communities affected:	None
Number of people affected:	landowners: None land users: None
Have any persons been physically displaced? If yes how many?	None
Permanent land use:	
Temporary land use:	
Overall Status of land acquisition:	
Is there a Resettlement Framework/ Resettlement Action and/or Livelihood Restoration Plan (RAP/LRP) developed for the Project?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>

11. GENDER

Is there a Gender Action Plan (GAP) developed for the Project?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
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12. COMMUNITY DEVELOPMENT

Please summarise the social or community development initiatives undertaken by the Client during the reporting period, and associated expenditure: Comment on whether the community has input into the selection of initiatives to be supported.

The Client held several discussions with the local administration at the district level (Shu district) as at the local level (Alga village) for the selection of projects financed by the Client as of its commitments in term of for the social or community development. Unfortunately, none of the proposed projects met the minimum requirements of the project company. In January 2022, a preliminary agreement was reached with the Alga village administration for exploring the development of a local green park in the village centre as a multiannual social project to be financed by the Project Company. If this project will be finally agreed between the parties, a first phase of the project will benefit of budget allocations for 2021 (not spent) & 2022 (10 k\$/year).

⁴ Indirect emissions from the grid electricity

M-KAT SOLAR POWER PLANT ENVIRONMENTAL AND SOCIAL ACTION PLAN IMPLEMENTATION STATUS

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
PR 1. Environmental and Social Appraisal and Management (ADB SR 1. Environment and Social Protection Strategy)								
1.1	Appoint designated Community Liaison Officer and provide to the EHS manager sufficient training in ISO 14001 and 45001 standards to enable her to develop the EHS and Stakeholder Management System and plans for the Project and implement them. Ensure full compliance with national legislation.	Delays in project implementation due to noncompliance with ESAP	EBRD PR1, par.15, best practice ADB SPS SR1	Staff time, training cost/ Top management, Site Manager	a.b. After start of Bank financing or before construction (whichever comes first) c. for the loan duration	a. CLO appointed. Training undertaken b. EHS documentation found adequate by a qualified consultant c. Full compliance with national legislation	AT	a. CLO appointed and trained in 2019 b. HSES manager appointed in December 2020. c. Full compliance with national legislation.
1.2	Include into tender documentation and Contractor's contract a provision on compliance with EBRD and ADB's EHS social and labour protection requirements, and ADB Social Protection Strategy including full compliance with national labour legislation and take measures to comply with ILO's core labour standards. Select contractors that demonstrate adequate capability in EHS and labour management including managing subcontractors. Ask contractors to develop an EHS plan agreeable to the Company before starting any activities. Audit the contractor adherence to the EHS aspects of the contract, ensure timely correction of deviations. Include in Contractor's contract a provision on compliance with national and local labor laws and measures to comply with the core labor standards.	Work delays / Good relations with authorities	EBRD PR1, par.20, ISO 14001, ISO 45001 Kazakh norms (SNiP, SanPiN, GOST), sectoral guidelines, EBRD policy. ADB SPS Prohibited Investment List, ADB SPS,; ADB Social Protection Strategy	-*EPC contractor time/ Legal and procurement dept., EHS manager	During tender packages preparation and construction	EPC Contractor HR policy aligned with the national labour legislation. Tender documents include ESAP requirements. Criteria for assessing contractors EHS and labour management capabilities established. Contractor EHS plan approved by the Company	NA	Compliance with EBRD ESP and national requirements is requested in EPC contract. HSE Plan has been developed. No longer applicable after construction completed

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
1.3	To the extent practicably possible obtain from the monocrystalline modules suppliers available information on their suppliers EHS impacts like occurrence of silicosis in quartz miners, silicon furnaces operators working condition, forced labour and worst forms of child labour as well as silicone tetrachloride recycling or disposing practices that prevent hydrochloric acid leachate escape	Risk of exposure to public criticism/Good company image	EBRD PR1 International Labour Organisation conventions 29 and 105 and 182, ADB SPS SR1	None/Site manager	Prior to procurement	Available with the supplier information is obtained	NA	The solar panels supplier EHS report obtained but it described only the plant itself and did not include its suppliers of raw material. As little leverage is available to demand further information, it was considered that no more action was possible. No longer applicable after installation completed
PR 2. Labour and working conditions (ADB SR 1. Environment and ADB Social Protection Strategy)								
2.1	Ensure that contractor and its subcontractors have a worker representative and a human resource policy which is disclosed to workers. Provide one grievance mechanism accessible to all project related workers with the ability to complain anonymously, and include in each answer a roadmap for an unsatisfied worker to take the grievance further.	Risk of work related conflicts and damage to assets / Better worker relations and company image among the local community	EBRD PR2 , par.20, ADB SPS SR1, Best practice	None / EHS manager	Prior to construction	Human resource policies of all involved in the project entities have provision for worker representation and are disclosed. Provision for anonymous complaints have been made and answers contain a roadmap for further complaints.	NA	A worker representative was elected. The grievance handling mechanism was disclosed. All workers have the ability to complain anonymously. No longer applicable after construction completed

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
2.2	Produce annual report on implementation of grievance mechanism, types of grievances and resolutions, and compliance with national labor laws and core labor standards. Request the contractor to monitor subcontractors working conditions and timely disbursement of wages by addressing related complaints through grievance handling mechanism		ADB Social Protection Strategy		During construction	Annual report on compliance with labor regulations and standards and grievance mechanism effectiveness in place. Complaints on working conditions and delays in disbursement of wages resolved timely.	NA	Information on implementation of grievance mechanism is provided in this annual report. No separate report prepared because no grievances there have been recorded. No longer applicable after construction completed
2.3	Develop Contractor and Suppliers Management Plan applicable to all subcontractors and core suppliers. If temporary accommodation is used, the plan should follow the IFC/EBRD Worker Accommodation Guidelines (Appendix 1) and national sanitary standards.	Good company image	EBRD PR2 IFC/EBRD Worker Accommodation Guidelines ADB SPS SR1		Before EPC contractor is mobilised.	Plan considers the need for worker accommodation and is applied to subcontractors and core suppliers.	AT	The employees of the O&M Contractor, the O&M Subcontractor and the HV substation subcontractor are not accommodated on the site. The security company contracted by the O&M Contractor accommodates up to 60 people (guards, management). The Project Company has financed the refurbishment and improvements of the accommodation, the canteen and the sanitary facilities made available to the Security Company.
PR 3. Resource Efficiency and Pollution Prevention and Control (ADB SR 1. Environment)								
3.1	Include control of the equipment exhaust excessive smoke in the internal audit checklist	Good company image	EBRD PR 3 RoK legislation,	None/Site Manager	Prior to construction	Control inserted in audit checklist	NA	Control of the equipment exhaust excessive smoke was

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
			ADB SPS SR1					included into the HSE inspection checklist. No longer applicable after construction completed
3.2	Develop a waste management plan to include broken solar panels utilization. Request the contractor to provide waste memos to ensure appropriate disposal location and methods, and to include this requirement in the agreement with its subcontractors.	Risk of contamination removed. Valuable components of broken panels utilised	EBRD PR 3, ADB SPS SR1	HSE Manager	1. Prior to construction 2. Continuously from start of construction	1. Plan uses the reuse-reduce-recycle-recover-safe disposal hierarchy 2. Waste memos available	AT	The EPC Contractor contracted a specialized company in utilization of solar panels. Damaged PV Modules were removed from the site by this company after construction.
3.3	Request and control that oil drums are stored on a sheltered and bunded pad. Ensure that contractor controls fuel tank drivers use of trays under refuelling couplings and that places of small repairs of machinery have leakage containment and swapping material	Ground contamination, fines, cost of cleanup.	Best practice	Construction supervisor	During construction	Oil drums containment eliminates leakage risk. Refuelling tank trucks checks and vehicle parking areas checks available.	AT	All fuel tanks have been removed. Mobile machinery is instructed to refuel at the Helios petrol station in Shu. Contract drafted with the Helios to provide a tank truck to refuel heavy machinery on site on request. Waste oil is given to the local shop for regeneration.
3.4	If water is used for panels washing, develop water use reduction plan WURP	Good company image	EBRD PR3	None/Site Manager	Before operation	Water use reduction plan in place and implemented	AT	WURP was developed based in 2021
PR 4. Health and Safety (ADB SR 1. Environment)								
4.1	Request the contractor to develop site specific HS plan with identification of risks and to transfer its OHS policy and system requirements to subcontractors through regular HS audits	Work site specifics and risk of rare accidents with severe consequences may be overlooked	ISO 45001, ADB SPS SR1	EHS Manager	Plan before construction, audit records during construction	OHS documentation shows that subcontractors HS performance effectively controlled	AT	All the staff and employees are taken to the HS induction and orientation training. Quarterly and monthly inspection documented with required mitigation measures and deadlines for completion.

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
4.2	For all high-risk works, add site specific risk assessments in the local permit-to-work system and enforce register of near misses with their in depth internal analysis For operation stage develop safety provisions for an individual electrician working alone	Risk generated by unusual conditions could be missed by HS instructions Electrocution without quick aid may lead to death or permanent disability	Legislative requirements	EHS Manager	Before operation starts	Permit to work has site specific risk assessment Near misses registered IWA provisions are in place	AT	Due to changes in local legislation in 2020, the procedure for carrying out hazardous work on work permits has been adapted by O&M Contractor. The forms of the PTW have been brought into line with the requirements of the Republic of Kazakhstan. Electrical works are carried out by team of at least 2 people.
4.3	Ensure that the fire protection belt width is at least 4m at the northern part of the site and 5m at the southern end where grass is thicker and higher. Plough the belt before each summer	Unusually strong ground fire with strong wind may surpass a standard fire protection belt around the site and damage panels	Best practice	Site Manager	Before each summer	No records of ground fire damage to the plant assets	AT	Fire protective grass cutting was carried out in July - August 2021 on whole site area including HV substation.
4.4	If security guards use firearms, ensure that they know and have on site the instruction for firearms secure storage, handing over and use against vulnerable groups of population	Public unrest, injuries, company image damage, complaints	PR 4 par.17/ Legislative requirements/ EU regulations, ADB SPS SR1	Site Manager	Construction and operation	Instruction available on site and covers all vulnerable groups	AT	The presence of firearms at the Security Service is not provided for in the Contract, there are no firearms on the site. The guards are armed only with batons for self-defence.

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
PR 5 Land Acquisition, Involuntary Resettlement and Economic Displacement (ADB SR 2)								
5.1	Prepare Land Acquisition Closure Report including: a. Project summary b. Socio-economic and vulnerability status of 5 displaced persons (DPs) c. Minutes of the meetings/consultations held with DPs d. Entitlement matrix as per PR5 (including legislative requirements) e. Evidence and timing of the payment; f. Conclusions and recommendations: It needs to confirm or otherwise that payments were made in line with PR5 requirements/national laws.	Good company image	PR5 practice Best	None/CLO	Within 2 months after the investment	Closure Report in place and its recommendations followed	NA	LACR has been approved by the Lenders.
5.2	If panels cleaning is required, consider employing local women and Alga village families which in the course of the CLO monitoring are identified as having been affected by displacement of their cattle from the SPP area	Good company image	PR5 practice Best	Training time/Site manager	During operation	At least 25% of total staff during operations are women. Out of cleaners at least 50% will be women and from Alga village	AT	In 2021, 50% of women from local communities were involved in panels washing, and 33% of women were involved in snow cleaning panels. The acquisition of a mechanical and motorized brushing system for panel cleaning mid-2021 led to avoid hand washing

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PR 6. Biodiversity Conservation and Sustainable Natural Resource Management (ADB SR 1. Environment)								
6.1	Enforce driving along surfaced with chip rock passages and make vehicle parking area as small as possible.	Soil structure damage alters vegetation for long time / Good housekeeping	Best practice	None/Site Manager	During construction	Design and order of construction minimise risk of damage. Subcontractors contracts and performance audit checklist include this requirement.	AT	All the project roads have been surfaced with 8cm chip rock and compacted. Local roadbed repair of the Central Road was carried out in 2021 by an O&M contractor. For vehicle parking, two parking lots for 10 parking spaces were organized.
6.2	Monitor vegetation reinstatement at damaged areas and soil for sign of wind erosion. If noted, apply effective erosion abatement measures.	Opportunity to minimise impact missed / good housekeeping	EBRD PR 6/ Best practice, ADB SPS SR1	Recultivation cost/Site Manager	Two vegetative seasons of operation	Monitoring information is inserted in Annual ES Report to EBRD and ADB	OT	No signs of wind erosion are observed after mowing the grass.
6.3	Prohibit staff and contractor contact with dead animal corpses, poaching and chasing of animals	Opportunity to minimise impact	Best practice	Site Manager	Prior to and during construction and operations	Prohibition is in the Code of behaviour	OT	Included in site induction. No finding during 2021.
PR 8. Cultural Heritage (ADB SR 1. Environment)								
8.1	a. Check that powerline, ORU and access road construction contractors conduct archaeological surveys b. If archaeological sites are found, consider the line relocation from the sites protection zone. Fence and mark the sites. Inform locals about the sites and their protection status c. If impact on sites is unavoidable exclude sites from the State Protection List, conducting the full detailed archaeological survey and excavation.	Fines and delays due to law violations. Negative public image.	Legislation EBRD PR 6, ADB SPS SR1	None/Site Manager	Before powerline and access road construction starts	a) Archaeological survey by licensed contractor in place b) Design avoids the sites protection zones. Letters to local councils with information on sites available. c) Authorities approve actions for the sites that will be under the project's impact	NA	No longer applicable after construction completed

No	Action	Environmental and Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources/Responsibility	Time-frame	Target and Evaluation Criteria for Successful Completion	Implementation status (ET, AT, OT, MD, SD, NA)	Comments on Implementation Status
	d. Develop and require the earthwork conducting subcontractors to follow the chance find procedures					d) Chance find procedure is in place and adhered to by the subcontractors		
PR 10. Information Disclosure and Stakeholder Engagement (ADB SR 1, SR 2, and SR3)								
10.1	Implement the Stakeholder Engagement Plan with the grievance mechanism and update it annually. Conduct information dissemination and meeting with surrounding stakeholders to increase awareness on the future construction in their area and potential impacts, and availability of grievance procedure if they have any issues/concerns.	Community issues identified and expectations managed	PR 10. – meaningful consultation ADB SPS	Top management / CLO	Before and during construction and operation.	SEP is up to date and implemented in full Grievance records properly maintained.	OT	Regular contacts have been maintained with the Alga Mayor and the Shu district administration. No registered grievances throughout 2021 except the villagers' complaint for lack of water pressure due to incorrect use of water pump on site. The situation was immediately corrected.
10.2	Provide general public access to information on the E&S performance of the Project and the Company	Large discrepancy between actual and perceived impact / Good company image	Best practice	CLO	During construction and operation.	Information disclosed according to SEP	MD	No information on environmental and social issues was put in the public domain during the reporting period. The project NTS, SEP and ESAP are still present on the Total Eren's website.
10.3	With Alga Public Governance Council develop and implement a Corporate Social Responsibility Program (CSR) for the Project and disclose it as per SEP. Allocate and disclose to the Public Governance Council the CSR budgets (on commissioning and annual). Use the following CSR actions selection criteria: 1. Action cost fits the allocated to the CSR budget and accounts for other needs; 2. Action does not overlap with the State programs;	Attain Community support and some community benefits from the project.	Best practice EBRD	Top management, CLO	Develop CSR during construction and implement after operation starts. After commissioning then on-going	Program agreed with stakeholders, disclosed as per SEP and implemented according to schedule	MD	The Client held several discussions with the local administration at the district level (Shu district) as at the local level (Alga village) for the selection of projects financed by the Client as of its commitments in term of for the social or community development. Unfortunately, none of the proposed projects met the minimum requirements of the project company. In

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	3. Action benefit is sustainable; 4. Action benefits the local community and is not biased to a particular group or person.				annual summary of CSR related actions in annual report			January 2022, a preliminary agreement was reached with the Alga village administration for exploring the development of a local green park in the village centre as a multiannual social project to be financed by the Project Company. If this project will be finally agreed between the parties, a first phase of the project will benefit of budget allocations for 2021 (not spent) & 2022 (10 k\$/year).
10.4	Report annually on project E&S issues and benefits and implementation of action plans to Lenders and other stakeholders	Ensure transparency on E&S issues	PR 10 – Information disclosure ADB SPS	CLO	Annually throughout Project implementation	Reports provided in time and fully completed. Monitoring reports disclosed	AT	The reports were provided on time.