



United Nations Office for Project Services

**Blueing the Caspian Sea: Building Capacities
for Pollution MONITORING and Biodiversity
Planning (P181526)**

DRAFT

Stakeholder Engagement Plan (SEP)

01 August 2025

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ABBREVIATIONS AND ACRONYMS

AUMCO	Austria Multi-Country Office
BCSP	Blueing the Caspian Sea Project
BMP	Biodiversity Management Plan
CSO	Civil Society Organization
E&S	Environmental & Social
EIA	Environmental Impact Assessment
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standard
FGD	Focus Group Discussion
FM	Financial Management
GBV	Gender Based Violence
GEF	Global Environment Facility
GRC	Grievance Redress Committee
GRM	Grievance Redress Mechanism
IDA	International Development Association
M&E	Monitoring & Evaluation
MENR	Ministry of Ecology and Natural Resources
MEP	Ministry of Environment Protection
MFA	Ministry of Foreign Affairs
NGO	Non-Governmental Organization
OIP	Other Interested Party
O&M	Operations & Maintenance
PA	Protected Area
PAD	Project Appraisal Document

PAP	Project Affected Person
PDO	Program Development Objective
PCU	Project Coordination
PIU	Project Implementation Unit
POM	Project Operations Manual
RPF	Resettlement Policy Framework
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment
TA	Technical Assistance
TCIS	Tehran Convention Interim Secretariat
UNEP	United Nations Environmental Program
UNEP TCIS	United Nations Environmental Program Tehran Convention Interim Secretariat
UNOPS	United Nations Office for Project Services
WB	World Bank

1. INTRODUCTION

1.1 Background

The World Bank project aims to assist Azerbaijan, Kazakhstan, and Turkmenistan to monitor pollution and improve biodiversity monitoring and planning in the Caspian Sea, which will be complementing ongoing national efforts to meet Tehran Convention obligations. The proposed PDO is to strengthen pollution monitoring and biodiversity planning in targeted sites within the Caspian Sea in Azerbaijan, Kazakhstan, and Turkmenistan.

The Global Environment Facility (GEF) will finance the World Bank to implement the national window of the Blueing the Caspian Sea: Building Capacities for Pollution monitoring and Biodiversity Planning Project. The United Nations Office for Project Services (UNOPS) will execute the project for the World Bank. UNEP will receive direct financing through the GEF to implement the regional window of the Project with the Tehran Convention Interim Secretariat (TCIS) as the executing body.

The Caspian Sea region is rapidly developing primarily due to its vast natural resources. Key resources include oil and natural gas reserves, making it a major global energy hub, with Azerbaijan, Kazakhstan, Russia, Iran, and Turkmenistan actively extracting and exporting these resources; however, complex political dynamics and disputes over resource division remain significant challenges to the region's full development potential. The development challenge is that the Caspian Sea has come under greater climatic, environmental and human pressures with increasing sources and quantities of pollution and negative impacts on biodiversity. The proposed project will benefit three riparian countries of the Caspian Sea: Azerbaijan, Kazakhstan and Turkmenistan.

The World Bank's Environmental and Social Standard (ESS) 10¹ recognizes the importance of open and transparent engagement with all Project stakeholders, based on the recognition that effective stakeholder engagement can improve E&S sustainability of Project activities, enhance Project acceptance, and implementation, and allow stakeholders to contribute to Project design. The key objectives of stakeholder engagement include a) an assessment of the level of interest and support of the Project by stakeholders to promote effective and inclusive engagement with all project-affected parties and b) to ensure that Project information on E&S risks and impacts is disclosed in a timely and understandable way.

This Stakeholder Engagement Plan (SEP) outlines all stakeholder engagements for the Project activities in a systematic way. It defines legal and policy requirements in regard to stakeholder engagements, lists stakeholder engagements that have already been undertaken, provides a stakeholder analysis of all relevant project-affected parties, including members of vulnerable groups, and lays out the means of dissemination of information to different parties as well as means and ways to continue to consult different stakeholder groups throughout the Project. It also includes a Grievance Redress Mechanism (GRM), by which people affected by project-related activities can bring their grievances and concerns to project management's attention, and which describes how those grievances and concerns will be considered and addressed. Furthermore, it contains a monitoring plan for the implementation of the SEP.

¹ The World Bank, Environmental and Social Framework (ESF), 2018.

1.2 Program Development Objective

The Project Development Objective (PDO) is to strengthen pollution monitoring and biodiversity planning in targeted sites within the Caspian Sea in Azerbaijan, Kazakhstan, and Turkmenistan.

1.3 Project Description

Component 1: Strengthening Pollution Monitoring

Comparability. Given the multiple sources, kinds, and varying impacts of pollutants affecting the Caspian Sea, the project will focus on developing systematic approaches and comparable monitoring, assessment, and action across the three countries in several dimensions of critical impact of pollution on biodiversity, ecosystem health, and water quality. The generation of comparable parameters and formats for pollution monitoring will enable countries to establish the state of pollution at regional level.

Caspian Sea focus. Each country has documented and addressed pollution challenges in different ways over time, with discontinuous investment in capacity and data collection and sharing of information and analysis on the common resources. Activities will focus on common areas at the national level with maximum impact on the Caspian Sea ecosystem and waters including (a) monitoring pollution from freshwater inputs (watersheds and runoffs), (b) enhancing coastal and marine pollution monitoring within the MPAs and nature reserves, and (c) addressing pollution originating from oil and gas exploration and production.

Scale-Up. The project will provide technical assistance to establish a national-level consultative and collaborative mechanisms for private and public sectors in the oil and gas industry with other sectors—notably regarding environment and marine resources—active in the Caspian Sea. The intent is to engage on the application of best practices to monitor and improve control of pollution and explore leveraging of companies' compliance monitoring of oil and gas industry operations. During project implementation, each country will convene at one national roundtable, followed by participation in one regional roundtable.

Subcomponent 1.1: Multi-country technical assistance to strengthen pollution monitoring.

Multi-country activities. A set of activities benefiting the three countries simultaneously will develop national programs of action consistent with the common and comparable approach mentioned above. The assistance aims to improve policy harmonization, share knowledge, and make comparable data available. Finance will be provided for a balance of technical assistance for policy, training, knowledge exchange, methods, and equipment. Multi-country activities also offer economies of scale such as for provision of guidebooks/approaches and training.

Marine pollution roundtables. The roundtables will be the main multi-country activity as it will allow economies of scale in the technical assistance and provide an opportunity for cross-learning among the three countries (Azerbaijan, Kazakhstan, and Turkmenistan). Three linked activities will be undertaken: (a) assist the three countries with organizing national pollution roundtable discussions to engage stakeholders (government, private sector, academia, civil society, and international experts) on opportunities for better pollution monitoring and identify needs for scale-up; (b) convene a multi-country (Azerbaijan, Kazakhstan, and Turkmenistan) roundtable to present findings of instruments

and policy/regulations needed to capitalize on opportunities for pollution monitoring; and (c) develop with each country one or more concrete prefeasibility studies of finance and policy instrument for pollution monitoring and reporting.

Subcomponent 1.2: Pollution monitoring in Azerbaijan.

The Environment Policy Department of the MENR will be the recipient of technical support in the following areas:

- a) **Development of a marine pollution monitoring scheme.**
 - A gap review of pollution monitoring with recommendations for a proposed MENR coordinated scheme for Azerbaijan.
 - National validation workshop with government approving institutional arrangements and adopting scheme.
 - Technical assistance, per the scheme, to the Environment Policy Department to adopt the scheme (e.g., support to drafting policies/laws, institutional arrangements, coordination, execution, and reporting & monitoring).
- b) **Capacity building in the pollution monitoring scheme**
 - Development of a MENR capacity building plan for marine pollution with emphasis on pollutants affecting MPA areas and river estuaries.
 - Implementation of the institutional arrangements and capacity building plan (incl. MENR arrangements decreed, training manuals developed, training conducted, including training on pollution monitoring system and equipment procured, its operations and maintenance).
- c) **Equipment for implementing the pollution monitoring scheme**
 - Selected equipment procured based on the key pollutants to collect and analyze as identified in the scheme affecting MPAs and river estuaries (with focus on seal rookeries and fish spawning areas).
 - Equipment operationalized.
- d) **Awareness raising, education and outreach, incl. monitoring report**
 - Develop awareness raising and outreach campaigns on marine pollution highlighting valuation of Absheron National Park MPA area in Baku metropolitan area and sturgeon regeneration in river estuaries.
 - Implement awareness raising and outreach campaign for affected stakeholders with focus on urban audiences and ecotourism.
 - Support MENR in developing an annual pollution monitoring report in collaboration with its partners including SOCAR and AGSC.

Subcomponent 1.3: Pollution monitoring in Kazakhstan.

The Kazakh Scientific and Research Institute of the Caspian Sea (KSRICS) of the MENR located in Aktau on the Caspian coast will be the recipient of support on pollution monitoring. A Presidential Decree created the institute on January 25, 2024, with a mission to coordinate national actions and regional engagement to address the multiple, diverse challenges to the Caspian Sea and its resources.

Specific pollution activities to be supported by the project include the following:

- a) **Marine pollution monitoring scheme.**

- Kazakhstan gap review with recommendations for a proposed scheme including inception KSRICS (MENR) staffing, capacity building and equipping needs.
- National validation workshop with government adopting final scheme for institutional arrangements, staffing and operations.
- Technical assistance KSRICS and its partners to adopt the scheme (draft policies/laws and take administrative measures for systemic monitoring and reporting).

b) Capacity building in pollution monitoring scheme incl. key pollutants

- Development of a KSRICS staffing and capacity building plan for marine pollution with emphasis on pollutants affecting MPA areas.
- Implementation of the institutional establishment and capacity building plan (incl. KSRICS statutes and governing arrangements established, training manuals developed, trainings conducted, including training on mandate, operations and logistics, and equipment procured, its operations and maintenance).

c) Equipment for pollution monitoring scheme

- Specific equipment procured based on the key pollutants to collect and analyze as identified in the scheme affecting MPAs (with focus on seal birthing areas).
- Equipment operationalized.

d) Awareness raising, education and outreach, including monitoring reporting

- Develop awareness raising and outreach campaigns on marine pollution and biodiversity impacts.
- Implement awareness raising and outreach campaign for affected stakeholders: coastal communities and actors, polluting sources, decision makers.
- Develop KSRICS annual monitoring report on pollution in collaboration with KazHydroMet (MENR) and KazMunyGaz.

Subcomponent 1.4: Pollution monitoring in Turkmenistan.

The CaspEcoControl of the MEP located in Turkmenbashi on the Caspian coast will be the recipient of support on pollution monitoring. The project will reinforce monitoring through targeted purchase of equipment vital to monitoring key pollutant inputs from rivers and runoff areas, with particular focus on biodiversity impacts and protected areas.

Specific pollution activities to be supported by the project include the following:

a) Marine pollution monitoring scheme.

- Turkmenistan gap review with recommendations for a proposed scheme.
- National validation workshop with government adopting final scheme.
- Technical assistance to CaspEcoControl (MEP) and its partners to adopt the scheme (draft policies/laws including monitoring and reporting plan).

b) Capacity building in pollution monitoring scheme incl. key pollutants (i.e. hydrocarbon sources)

- Development of a CaspEcoControl capacity building plan for key sedimentary, seawater and atmospheric pollutants focusing on MPA areas including river estuaries.
- Implementation of the capacity building plan (incl. training manuals developed, training conducted incl. training on equipment procured, its operations and maintenance).

c) Equipment for pollution monitoring scheme

- Target equipment for key pollutant sources to collect and analyze, procured based on identified gaps in availability or operational ability.
- Equipment operationalized.

d) Awareness raising, education and outreach, including monitoring reporting

- Develop awareness raising and outreach campaigns for identified pollution sources (i.e., oil and gas sectors), decision makers and the public nationally and specifically Turkmenbashi and the Caspian coast.
- Implement awareness raising and outreach campaigns.
- Develop annual CaspEcoControl monitoring report in association with oil and gas industry and other partners.

Component 2: Strengthening Biodiversity Planning

A keystone species approach. The project will focus on visible and well-known keystone species, Caspian seal and sturgeons, as beacons for advocacy and rationale for protected areas management with the aim of bringing demonstrated successes to scale post-project. Each country has documented and addressed biodiversity challenges in different ways over time, with discontinuous investment and coordination in data collection and sharing of information and analysis on the common resources. For example, the population of Caspian seal today is a rough estimate, and without a functioning protocol for monitoring seals and keystone species, the population cannot be effectively managed at the national or regional level. The project will go beyond recommendation for monitoring to actual reporting on the status of seal populations in the three countries.

Biodiversity finance for scale-up. To raise the ambition and scale of results beyond project life, the project will engage the government and partners on innovative financing instruments. Specifically, the project will explore the opportunity to leverage the World Bank's bond issuance platform and seek non-government contributions. Innovative finance has been demonstrated successfully, for example with the Bank's "Rhino Bond."²

Subcomponent 2.1: Multi-country technical assistance to strengthen biodiversity planning.

Multi-country activities. The focus will be on addressing biodiversity monitoring and planning through three key areas: (a) studies to understand the ecosystem in specific areas; (b) analyses of institutions and regulatory frameworks; (c) technical assistance to prepare protected areas management plans; (d) supporting evaluation of and conservation measures for flagship species indicative of Caspian Sea viability: the Caspian seal and sturgeon populations.

Economies of scale. The project will include activities that guide national implementation for biodiversity monitoring and planning. This includes (a) technical studies and how-to guidebook on biodiversity conservation; (b) learning and exchanges among regional experts and with international scientists; (c) regional workshop on innovative finance instruments to be followed by national level pre-feasibility.

Subcomponent 2.2: Biodiversity planning in Azerbaijan.

²

<https://thedocs.worldbank.org/en/doc/7039bd837e60e484fb3a93ea63951306-0340022022/original/CaseStudy-WildlifeConservationBond.pdf>

The project will contribute to biodiversity monitoring and planning through an increase in and improvements to its MPAs system and evaluation of the status of flagship species. Through the Biological Diversity Protection Service in the MENR, the project will add a marine protected area to the existing Absheron National Park, which located in central Azerbaijan adjacent to the Baku metropolitan area.

Specific biodiversity activities to be supported by the project include the following:

a) Priority setting

- Stocktaking of lead species, with particular attention to status Caspian seals, fish and waterfowl in Absheron MPA.
- Technical study and recommendations for the overall protected areas system enhancement, including application of the GEF Management Effectiveness Tracking Tool (METT) approach.
- Preparation of site-specific environmental and social instruments.

b) Validation of recommendations for MPAs and for Absheron NP as pilot MPA

- Support to the consultation process for the proposed expansion of the Absheron NP with participation of government, research, tourism, oil companies, fish companies, and civil society on MPAs and use of GEF promoted METT approach for Absheron MPA

c) Technical assistance to develop the protected areas management system

- Drafting of the MPA management plan, specifically for Absheron National Park.

d) Technical assistance to adopt policies/laws required to expand Absheron as MPA

- Technical assistance MENR to draft policies, charter, and laws to update legal status and management Absheron MPA.

e) Capacity building in managing the Absheron MPA

- Capacity building of government, academia, NGOs and private sectors (including tourism) on MPA management with the Absheron NP pilot (incl. training plans, training/workshop and training on public communications, stakeholder consultations, and equipment)

f) Equipment for PA management in Absheron National Park

- Selected equipment as per identified needs for METT approach including support to specifying the type of equipment.

g) Awareness raising/outreach for protected areas management

- Develop overall awareness/outreach strategy on MPAs and biodiversity conservation highlighting Caspian seals and sturgeon regeneration.
- Awareness/outreach strategy implementation for private sector (including tourism) for awareness on conservation, on Baku metropolitan area MPA expansion of Absheron, on importance islands for seals and river estuaries for fish, at both local and national level.

h) Innovative finance

- Pre-feasibility study on one selected instrument.

Subcomponent 2.3: Biodiversity planning in Kazakhstan.

The project will contribute to Kazakhstan biodiversity monitoring and planning through support to a recently created Caspian ItbalygyState Nature Reserve in the Mangistau Region that serves as an important habitat for the migratory Caspian seal.

Specific biodiversity activities to be supported by the project include the following:

- a) **Priority Setting**
 - Stocktaking of lead species with particular attention to status Caspian seal birthing areas in Mangistau marine area.
 - Technical study on management on MPAs incl. recommendations for overall protected areas system, including application of the GEF METT approach for improved conservation.
 - Preparation of site-specific environmental and social instruments.
- b) **Validation of recommendations for MPAs and for Mangistau region as pilot MPA**
 - Validation workshop led by KSRICS and Forestry and Wildlife Committee with other government, research, ecotourism actors and civil society on MPAs and use of GEF METT approach for the Caspian Itbalygy State Nature Reserve in the Mangistau Region
- c) **Technical assistance to develop KZ PA management system**
 - Technical assistance KSRICS and its partners to draft the MPA management system/plan, specifically for the recently created Caspian Itbalygy State Nature Reserve in the Mangistau Region.
- d) **Technical assistance to implementing policies/laws of the Caspian Itbalygy State Nature Reserve**
 - Support to KSRICS and Forestry and Wildlife Committee to draft policies and laws to update legal status and management Mangistau Region MPA pilot.
- e) **Capacity building in managing the Caspian Itbalygy MPA**
 - Capacity building to the government, academia, NGOs and ecotourism actors on the management of the Mangistau Region Caspian Itbalygy MPA pilot (incl. trainings plans, trainings/workshop and training on public communications, stakeholder consultations, and equipment)
- f) **Equipment for PA management in "State Nature Reserve Caspian Itbalygy"**
 - Selected equipment as per identified needs for METT approach including support to specifying the type of equipment.
- g) **Innovative finance**
 - Pre-feasibility study on one selected instrument

Subcomponent 2.4: Biodiversity planning in Turkmenistan.

The project will contribute to biodiversity monitoring and planning through an increase in marine protected areas with the proposed Garabogaz Wildlife Sanctuary to be part of the overall Hazar State Nature Reserve (HSNR), and improvements to MPAs system and evaluation of the status of flagship species.

- a) **Priority Setting**

- Stocktaking on lead species with particular attention to status Caspian seal, sturgeon and other faunal areas in Hazar State Nature Reserve (HSNR).
- Technical study on MPAs including recommendations for overall protected areas system (incl. application of METT approach for improved conservation).
- Preparation of site-specific environmental and social instruments.

b) Validation of recommendations for MPAs and for the creation of Garabogaz Wildlife Sanctuary. Validation workshop led by MEP HSNR office in Turkmenbashi with other government office, research, ecotourism sector and civil society on MPAs to agree and confirm on selected PA and use of GEF promoted METT approach for the Garabogaz Wildlife Sanctuary.

c) Technical assistance to develop TK PA management system

- Technical assistance to MEP (responsible MPA department) to draft the MPA management system/plan, specifically for HSNR MPA expansion.

d) Technical assistance to adopt policies/laws required to expand HSNR area as MPA

- Technical assistance to MEP to draft policies and laws to update legal status and management HSNR to include the proposed Garabogaz Wildlife Sanctuary.

e) Capacity building in managing the expanded KSNR MPA

- f) Capacity building for government, academia, NGOs and ecotourism sector on the management of the pilot expanded HSNR MPA area with Garabogaz Wildlife Sanctuary (incl. trainings plans, trainings/workshop and training on public communications, stakeholder consultations, and equipment).

g) Equipment for PA management of HSNR MPA extension

- Selected equipment as per identified needs for METT approach including support to specifying the type of equipment.

h) Awareness raising/outreach for protected areas management

- Awareness/outreach strategy on MPAs and biodiversity conservation (highlighting Caspian seals and other flagship fauna).
- Awareness/outreach strategy implementation incl. ecotourism (awareness on conservation, on expansion of the HSNR MPA incl. Garabogaz Wildlife Sanctuary, on importance of the islands and marine area for Caspian seals and other fauna, at both local and national level).

Component 3: Project Coordination, Monitoring and Evaluation

This component will coordinate the technical implementation of the project activities. Coordination functions include project activity planning, procurement of technical assistance, M&E of project results, production of progress reports, management of ESF compliance including the establishment of the GRM. The PIU will be housed at UNOPS offices in Vienna, Austria, and will comprise professional, administrative, and support staff, and in each of the three countries a Focal Point will be on retainer contract to facilitate and support the acts required by the government. The PIU will be responsible for the overall coordination of the project and will, among others, (a) oversee the preparation of annual implementation/operating plans, (b) support the organization of the biannual project steering committee meetings, and (c) prepare progress and other reports, as required by the GEF and the World Bank.

1.4 Project Geographical Location

The Project will be implemented in Azerbaijan, Kazakhstan and Turkmenistan at the respective national levels as well as in project locations in the three countries, where Marine Protected Areas (MPAs) are to be established or expanded. These include the Caspian Itbalygy State Nature Reserve in Kazakhstan; the Absheron National Park in Azerbaijan and the Ogurjaly Island Nature Reserve in Turkmenistan. The UNOPS Project Implementation Unit (PIU) will be based in Vienna, Austria.

1.5 Project Beneficiaries

The primary target group is the three Caspian Sea riparian countries — Azerbaijan, Kazakhstan, and Turkmenistan— which will benefit from the Project through direct GEF support for the implementation of the project activities that will help them meet the obligations under the Tehran Convention and its protocols. In addition, relevant ministries from the three Project Focus Countries identified as key stakeholders in each country will benefit from capacity building in biodiversity monitoring and planning and pollution monitoring under this project.

1.6 Potential Environmental and Social Risks

The environment and social risk of the project has been rated as *Substantial*. The creation and expansion of MPAs may restrict access to natural resources for communities and businesses, which may lead to economic pressure on local communities and to illegal activities, such as poaching and fishing. There could also be negative impacts on vulnerable groups through land appropriation for the expansion or creation of MPAs. Once the MPAs are created, conflict between law enforcement and communities could arise around the MPAs.

The project is proposed to work in three specific areas, and the potential risks of the expansions in terms of number of people displaced, number of people whose livelihoods may be affected, and estimated area of land to be expropriated is characterized as follows:

- **Azerbaijan, Absheron National Park.** The boundaries for the expansion of the existing national park to include marine areas will be determined in year 1 of the project. It is not anticipated that people will need to be displaced. Livelihoods are unlikely to be affected negatively as recreational fishing is likely to continue to be allowed. No land is expected to be expropriated.
- **Kazakhstan, Caspian Itbalygy State Nature Reserve:** The boundaries of the marine reserve, which includes the “Seal Island” site and the “Prorva” site, were established by the government in 2024. No communities live in the area that was declared, and no people are expected to be displaced. Livelihoods are unlikely to be affected negatively as fishing with permits will likely continue to be allowed. There could be changes needed to shipping routes. No land is expected to be expropriated.
- **Turkmenistan, Garabogaz Wildlife Sanctuary.** The boundaries of the sanctuary have been proposed and will be confirmed in year 1 of the project. There are no settlements, farms, or villages located within or adjacent to the proposed sanctuary. As a result, there is currently no

significant local human impact on the area's ecosystems through agriculture, fishing, or other resource-based activities. No land is expected to be expropriated.

Further risks and impacts through the creation of MPAs in regard to biodiversity include (i) alterations of ecosystem through predatory-prey disruptions, (ii) invasive fish species may take advantage or protected spawning zones competing with sturgeon for habitat, (iii) increased populations of invasive marine species, and (iv) overfishing and harming of marine life in other areas. Other social risks include lack of stakeholder inclusion and access to Grievance Redress Mechanisms especially where activities under Component 2 inflict the expansion or new creation of PAs, affecting people's access to resources in the new PA areas; and (v) during the operational period there may be use of force by enforcement agencies to protect the MPAs. No enforcement agency will be funded by the Project, but the countries will need to enforce the relevant restrictions using only the procedures set in the MPAs. Other social risks include the potential loss of jobs through restrictions on the polluter industry.

These risks will be managed and mitigated through the application of generic risk mitigation measures as listed in the generic Environmental and Social Management Plan (ESMP) included in the Environmental and Social Management Framework (ESMF), as well as site-specific Environmental and Social Management Plans (ESMPs), the Resettlement Policy Framework (RPF); a Process Framework, as well as this Stakeholder Engagement Plan (SEP) and Grievance Redress Mechanism that have been prepared for this Project.

1.7 Institutional Arrangements

Regional Steering Committee (RSC). The project is proposed to have an RSC that would approve the annual work program and budget, identify links to relevant sectoral policies and programs in the region, and assist in resolution of any implementation issues. The RSC will be co-chaired on a rotating basis by one senior representative of the three countries designated by their respective focal point ministry and one representative of UNOPS. Members will include representatives of national institutions related to the themes of the project (biodiversity and pollution) and a civil society representative from each country. The World Bank and UNEP will be invited as observers. The RSC will be set up during the first six months of implementation of the project and will meet at least once a year. A detailed terms of reference for the RSC will be developed ahead of the first RSC meeting as part of the Project Operations Manual (POM).

Ad hoc Technical Advisory Committee (TAC) will be established to advise on specific technical issues and guidance on coordinating technical matters with other ongoing activities. Members of the TAC would include representatives of academia, technical agencies, private sector, civil society organizations, and fisheries committee(s), including existing committees that are part of the Tehran Convention. It is envisioned that the TAC will convene at least once a year or at the frequency needed for technical questions that may arise.

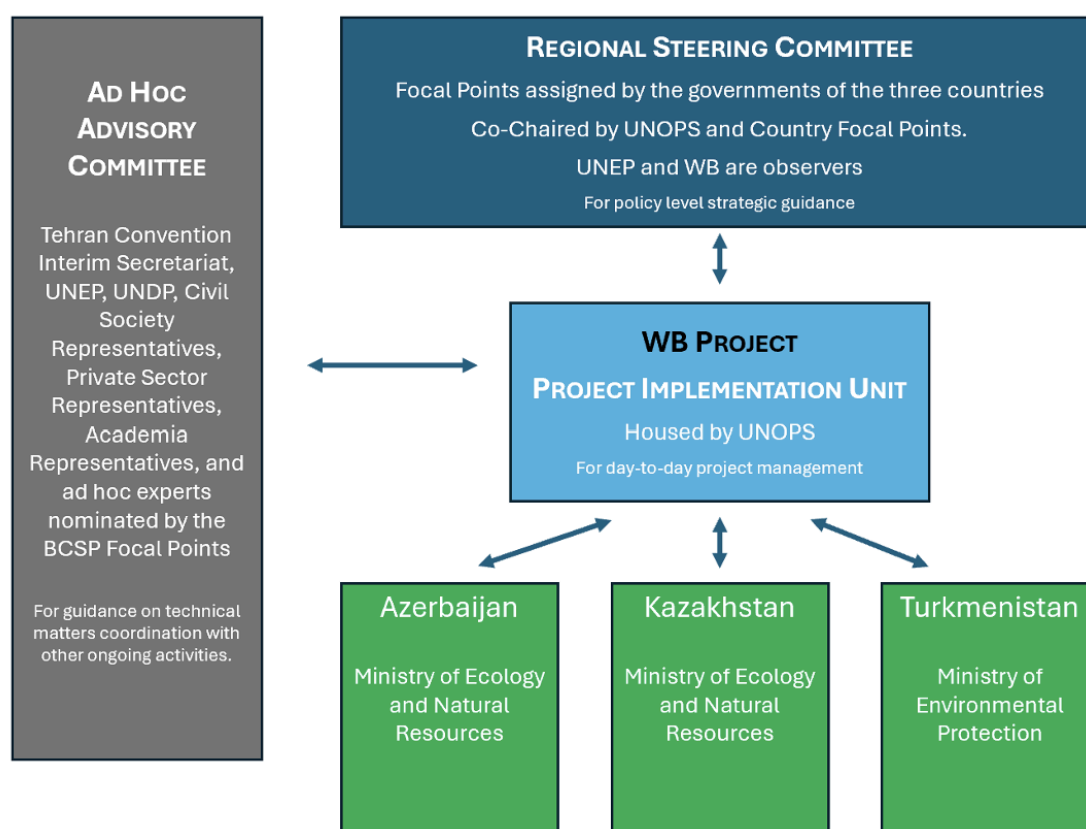


Figure 1 Organizational Chart

The project will further engage personnel to manage the requirements of the relevant Environmental and Social Standards (ESS) as well as consultants and, or contractors to support the implementation of the project in each country as required in the agreed implementation plan. The UNOPS BCSP PIU will be responsible for coordination, implementation, and monitoring and evaluation (M&E) of the project, as well as procurement, FM, and ESF compliance, including approving and tracking the distribution of funds and environmental and social management and monitoring. The PIU will include an Environmental and Social Specialist that will mainly be responsible for the implementation of this SEP.

The UNOPS BCSP PIU will be responsible for coordinating with each national BCSP Focal Point assigned by the respective Government for the execution of national-level activities in Azerbaijan, Kazakhstan and Turkmenistan. The national agencies include the Ministry of Ecology and Natural Resources of the Republic of Azerbaijan, Ministry of Ecology and Natural Resources of the Republic of Kazakhstan and the Ministry of Environment Protection of Turkmenistan. The UNOPS BCSP PIU will mobilise/contract national expertise as needed to implement the SEP and GRM including regular reporting. The national agencies will provide technical guidance for the overall implementation of the project in consideration of the RSC observation and in support of the PIU.

1.8 Objectives of the SEP

This Stakeholder Engagement Plan (SEP) will apply to all UNOPS executed activities of the Project. It aims at facilitating stakeholder engagement throughout the Project's life cycle and across the Project components.

The objectives of this SEP are to:

- Identify Project stakeholders, including members of vulnerable groups, their priorities, and concerns.
- Identify strategies for information sharing and communication to stakeholders as well as consultation of stakeholders in ways that are meaningful and accessible throughout the Project cycle.
- Specify procedures and methodologies for stakeholder consultations, documentation of the proceedings and strategies for feedback.
- Establish an effective, operational, transparent and responsive grievance mechanism for the Program.
- Develop a strategy for inclusive and meaningful stakeholder participation in the monitoring of project impacts, documenting, reporting and dissemination of results among the different stakeholders.

2. Regulations and Requirements

Stakeholder engagement is an inclusive process conducted throughout the Project life cycle to support the development of strong, constructive, and responsive relationships that are important for successful management of a Project's environmental and social risks. The World Bank's Environmental and Social Framework (ESF) includes ESS10 on "Stakeholder Engagement and Information Disclosure", which recognizes "the importance of open and transparent engagement with the Program stakeholders as an essential element of good international practice". ESS10 also provides that effective stakeholder engagement can significantly improve the environmental and social sustainability of Projects, enhance Project acceptance, and make a significant contribution to successful Project design and implementation.

The application of these standards, by focusing on the identification and management of environmental and social risks, will support recipients in their goal to reduce poverty and increase prosperity in a sustainable manner for the benefit of the environment and their citizens. The standards will:

- a. support recipients in achieving good international practice relating to environmental and social sustainability;
- b. assist recipients in fulfilling their national and international environmental and social obligations;
- c. enhance non-discrimination, transparency, participation, accountability, and governance; and
- d. enhance the sustainable development outcomes of projects through ongoing stakeholder engagement.

Stakeholder engagement is also provided for in the various forms of national legislations, including legislation on environmental and social impact assessments and audits. The instruments advocate for meaningful involvement of project stakeholders in decisions that affect them, participatory planning, and transparent grievance mechanisms.

In Turkmenistan the Law of Turkmenistan 'On Environmental Assessment' establishes a framework for environmental evaluations including provisions for public consultations. The Law 'On Environmental

Protection' outlines the rights of citizens in environmental protection, including the right to participate in environmental protection activities, access relevant information, and engage in public environmental assessments. This legal framework empowers the public to be actively involved in environmental decision-making.

In Azerbaijan the Law on Environmental Impact Assessment (EIA) (2018) includes the requirement for public consultations for the preparation of environmental impact assessments. The Law on Protection of the Environment (1999) further includes emphasis on the importance of public participation.

In Kazakhstan, the Environmental Code from 2021 emphasises the importance of public participation in environmental decision-making processes. It mandates that for environmental impact assessments (EIA) for proposed projects, public consultations must be held to ensure that citizens have the opportunity to provide inputs on potential impacts.

3. Stakeholder Identification and Analysis

The stakeholders of the Project activities are individuals or groups (parties) that can be affected by the Project outcomes, either directly or indirectly and both positively or negatively (Project-Affected Parties (PAP) or have an interest in the project (other interested parties - OIP). Analysis of stakeholders therefore encompasses identification of the stakeholder groups that are likely to influence or be affected by the proposed components either positively or negatively and organizing them according to the potential impacts of the activities on them.

Stakeholders can be classified based on: a) their roles and responsibilities in the Project; b) the influence/interest in the Project; c) whether they are direct or indirect beneficiaries; and d) whether they are vulnerable groups.

Overall stakeholder groups at different stages of the Program, (i.e. preparation, implementation and closure) are presented in Table 1. Considering that stakeholders are likely to change in the course of the Project, the stakeholder list will be revised and updated continuously to include new stakeholders with access to additional information.

Table 1 Summary of Stakeholders Identification

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
Regional/National level								
UNEP	UN agency	Implementer	High	PAP		English	Meetings, email, phone, virtual meetings	• none
World Bank	International Organization	Implementer	High	PAP		English	Meetings, email, phone, virtual meetings	• none
Project Regional Steering Committee(s)	International Organizations	Implementer	High	PAP		English and local languages (Turkmen, Azerbaijani, Kazakh, Russian)	Meetings, email, phone, virtual meetings	• None
Project Technical Advisory Committee	International and national organizations	Implementer	High	PAP		English and local languages	Meetings, email, phone, virtual meetings	• None
National BCSP Focal Points (govt): Republic of Azerbaijan Ministry of Ecology and Natural Resources	Governmental	Will be monitoring the activities on the ground and coordinating capacity building on	High	PAP		Local languages	Meetings, email, phone, virtual meetings, website	• none

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meeting s)
Republic of Kazakhstan Ministry of Ecology and Natural Resources Turkmenistan Ministry of Environment Protection		natural resources management						
Members of the academia	Academic institutions	Conduct research on pollution control and biodiversity management	Medium	PAP / OIP		English and local languages	Meetings, email, phone, virtual meetings, website, social media	None
Staff of Technical Agencies	Professionals	Working on issues related to pollution control and biodiversity management	Medium	PAP		Local languages	Meetings, email, phone, virtual meetings, website, social media	none
Private sector companies	businesses	Supporting pollution control and biodiversity management	Medium	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	none
CSOs/NGOs	Non-govt organizations	Supporting pollution control and biodiversity management	Medium	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	none
Fishery Committees	Regional and national organizations	Affected by measures	High	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	none

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meeting s)
Existing committees of the Tehran Convention Tehran Convention Interim Secretariat (TCIS)	International entities	Supporting pollution control and biodiversity management	High	PAP		English	Meetings, email, phone, virtual meetings, website, social media	none
Relevant national institutions	Governmental	Supporting pollution control and biodiversity management	Medium	OIP		Local languages	Meetings, Formal letter, email, phone	none
Local Level								
Local Government Entities	Governmental	Supporting pollution control and biodiversity management	High	PAP		Local languages	Meetings, Formal letter, email, phone	none
NGOs/CSOs	Local organizations	Supporting pollution control and biodiversity management	Medium	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	None
Private sector entities	Local businesses	Supporting pollution control and biodiversity management	Medium	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	None
Local fishermen associations	Local association	Affected by measures	High	OIP		Local languages	Meetings, email, phone, virtual meetings, website, social media	None

Stakeholder	Category Department	Mandate/Role	Interest	Stakeholder group PAP/ OIP		Language needs	Preferred notification means (Emails, Phone, Letters)	Specific needs (accessibility, large print, daytime meetings)
Landholders affected by expansion or establishment of Protected Areas	Individuals	Affected by measures	High	PAP		Local Languages	Meetings, email, phone, virtual meetings, website, social media	None
Households whose livelihoods mainly depend on sea-related activities such as fishing, Households whose access to resources is limited due to the expansion or creation of PAs Women-headed households, Migrant workers, Persons with disabilities, Elderly people, Youth and children Workers from affected industries	Vulnerable groups	Affected measures by	High	PAP / OIP		Local Languages	Meetings, email, phone, virtual meetings, website, social media	Potential physical limits to access meetings

4. Stakeholder Engagement Program

Stakeholder engagement refers to the process of interacting and working with stakeholders identified as relevant to the Project to come up with new concepts, identify challenges and discrepancies and how to address issues that may rise. All this helps in the recognition and actions in favor of stakeholder needs and expectations for effective implementation of Program components.

This SEP is used to formulate schedules, strategies and general plans to ensure there is effective, meaningful and inclusive participation of project affected persons, including members of vulnerable groups, and other interested parties, throughout the entire Project life cycle. It consists of planning on how consultations will take place, developing the layout and how issues raised will be addressed and responded to in a transparent, meaningful, timely and inclusive manner. The importance of this is to provide an effective outline of activities to be undertaken within a given timeframe to ensure effective stakeholder involvement and improve the Project's sustainability and development benefits. The SEP outlines how consultations are to be carried out and the scope of work to be achieved. The SEP will be updated on a regular basis to promptly include new developments and issues that may arise. This may include the techniques to be used in the engagement of stakeholders to address stakeholder concerns.

The SEP describes the timing and methods of engagement with stakeholders throughout the life cycle of the Project as agreed between Bank and UNOPS, distinguishing between PAPs OIPs. The SEP also describes the range and timing of information to be communicated to PAPs and OIPs, as well as the type of information to be sought from them.

The SEP should be considered together with the Process Framework, which lays out additional stakeholder engagement processes and requirements specifically around the extension or establishment of MPAs.

4.1 Preparation Stage: Summary of Stakeholder Engagement Activities

During the Project preparation phase a variety of stakeholder engagements have been undertaken in the three Project countries between April 2024 and May 2025 (see Annex 1 for more details).

Key issues raised during the stakeholder consultations in the project preparation phase included the following:

Country	Key Issues Raised
Azerbaijan	- interest in the funding of international expertise to help bring respective ongoing initiatives in Azerbaijan to scale, including the understanding of integrated coastal management and maritime spatial planning tools
	- interest in the expansion of the marine part of the Samur-Yalama National Park, located in the north of the country, or possibly another national park such as Absheron;

	<ul style="list-style-type: none"> - interest in the elaboration of management plans for selected PAs, application of more effective PA management practices through the promotion of sustainable ecotourism practices; and the development of exchange platforms for national parks managers from the three participating countries with dedicated capacity-building sessions.
	<ul style="list-style-type: none"> - interest in improving pollution monitoring in the Caspian Sea, specifically: i) identifying the most suitable locations for monitoring stations, ii) supporting offshore monitoring by purchasing equipment for a monitoring vessel, iii) developing a legal framework for pollution monitoring following international standards, iv) developing guidance/methodology on coastal clean-up from oil exploration activities, v) supporting cross-learning among the participating countries and other regions on the monitoring of the marine environment, and vi) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment.
	<ul style="list-style-type: none"> - Confirmation that a new MPA in the marine area surrounding “Absheron National Park” would be created for a focus on biodiversity, including knowledge/studies to better understand how the habitat for migratory birds, Sturgeon, and Caspian seal.
	<ul style="list-style-type: none"> - inadequate coordination among countries and insufficient data sharing, as well as a low interest from stakeholders to cooperate with government institutions. The role of local communities in decision-making should be increased.
	<ul style="list-style-type: none"> - Anticipated social impacts: potential closures of polluting industries, unemployment may occur. Recommendation for diversity income sources and rely more on sustainable incomes, like environmental tourism
	<ul style="list-style-type: none"> - In case there are reduced fishing opportunities for local populations due to PAs, designated fishing grounds should be established in alternative areas with sustainable fishing opportunities, for example an increase of fish farms. Furthermore, awareness raising of local communities is very important. Recommended to organize an inception meeting. This meeting can ensure the participation of all interested parties. For example, such meetings can be organized in Absheron National Park and on the islands included in the territory of the National Park to be expanded, with local population, fishermen and industrial workers, as well as civil society institutions.
	<ul style="list-style-type: none"> - the most vulnerable stakeholders are local communities, some traditional tourism stakeholders, and women. Key stakeholders named are NGOs, government, fishermen, oil industry representative, tourism actors. Vulnerable stakeholders are women, local stakeholders, local families with low income.
	<ul style="list-style-type: none"> - Research institutions indicate that one of the key challenges to pollution and biodiversity is the lack of infrastructure, informal settlements in areas close to the sea, lack of sewage systems, needs arising from low awareness levels of the local populations, and a lack of good coordination between countries. Strengthen cooperation

	between scientific institutions of the coastal countries and develop various scientific programs related to pollution and biodiversity.
	- investigate how pollution and biodiversity problems affect the situation of Caspian coastal communities.
	- Include "polluter pays" scheme.
	- representatives of the private sector and some industries located on the Caspian coast are concerned that their activities may be suspended. A number of job closures could increase unemployment. This is mostly related to polluter industries.
Kazakhstan	- The government expressed interest in improving Caspian Sea pollution monitoring, specifically i) increasing the monitoring potential of the Kazhydromet, which is responsible for the state monitoring of the Caspian Sea environment; ii) supporting the monitoring of sea-based pollution (from offshore oil and gas exploitation and maritime transport) by purchasing satellite images and integrating them with the national monitoring structure and procedures; iii) developing a legal framework for pollution monitoring that follows international standards; iv) supporting cross-learning among the participating countries; and v) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment. The Caspian Sea Institute in Aktau is expected to also carry out relevant scientific research on the drivers, pressures, and measures related to pollution of the marine environment of the Caspian Sea.
	- Key challenge: The need to develop a state system of monitoring of pollution and biodiversity of the marine environment of the Caspian Sea
	- inform the population about the relevance of the problem of protecting these territories, their importance for the natural environment and the population, as well as awareness the population with the protection measures that the state is taking for conservation of these nature reserves
	- social risks connected to the Project in terms of aquatic biological resources are not envisaged
	- Key stakeholders on biodiversity conservation activities include local governments, specialized scientific organizations, as well as environmental and law enforcement agencies
Turkmenistan	- The government is considering the expansion of existing PAs and to this end, more scientific research is required to identify the rationale for the expansion of the PAs from ecological and biological perspectives
	- The government expressed interest in improving Caspian Sea pollution monitoring, specifically i) increasing the monitoring potential of the CaspEcoControl Service by improving the capacity and providing measuring methodologies of the laboratory facilities which would be aligned with ones of other Caspian countries; ii) supporting the monitoring of sea bottom sediments; iii) developing a

	legal framework for pollution monitoring that follows international standards; iv) supporting cross-learning among the participating countries; and v) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment.
	- pollution monitoring capacity needs to be strengthened in pollution surveyance, including revision of the pollution monitoring and reporting scheme, and equipment provided to the Caspian Environmental Control Service in Turkmenbashi
	- The government has decided to create a new protected area named “Garabogaz Wildlife Sanctuary” as protected habitat for Caspian seal and migratory birds, and for which the project will support the preparation of the management plan.
	- Participants expressed a desire for more meetings and discussion

4.2 Proposed Strategy for Information Disclosure and Consultation

Information disclosure to all stakeholders will rely on the following key methods: correspondence by phone/mail; in person meetings; virtual meetings; email; website, and social media. Information will be disclosed in English as well as the local languages. Contact details will be updated during project implementation.

Table 2 Strategy for Information Disclosure and consultation

Information to be disclosed or consulted on	Target Stakeholders	Messages/ Agenda	Methods of Communication and Consultation	Timetable: locations / dates	Responsibility
PROJECT PREPARATION					
<p>Project information</p> <p>Stakeholder Engagement Plan (SEP)</p> <p>Environmental and Social Commitment Plan (ESCP)</p> <p>Environmental and Social Management Framework (ESMF)</p> <p>Resettlement Policy Framework (RPF)</p> <p>Process Framework</p>	<p>UNEP</p> <p>World Bank</p> <p>Project Regional Steering Committee(s)</p> <p>Project Technical Advisory Committee</p> <p>National BCSP Focal Points (govt):</p> <p>Republic of Azerbaijan Ministry of Ecology and Natural Resources</p> <p>Republic of Kazakhstan Ministry of Ecology and Natural Resources</p> <p>Turkmenistan Ministry of Environment Protection</p> <p>Members of the academia</p> <p>Staff of Technical Agencies</p> <p>Private sector companies</p> <p>CSOs/NGOs</p> <p>Fishery Committees</p> <p>Existing committees of the Tehran Convention</p> <p>Tehran Convention Interim Secretariat (TCIS)</p> <p>Relevant national institutions</p>	<p>Present the Program – objectives, rationale, components, benefits and beneficiaries, Implementation arrangements.</p> <p>Indicative implementation schedule and period, project contacts.</p> <p>Present stakeholders identified and description of the approach to stakeholder engagement.</p> <p>Present Project-level E&S instruments</p>	<p>Phone/mail; in person meetings; virtual meetings; email; website, and social media</p>	<p>During project preparation</p> <p>In three project countries</p>	UNOPS
General Project information	<p>UNEP</p> <p>World Bank</p> <p>Project Regional Steering Committee(s)</p> <p>Project Technical Advisory Committee</p> <p>National BCSP Focal Points (govt):</p> <p>Republic of Azerbaijan Ministry of Ecology and Natural Resources</p>	Disclosure of Project documentation	Phone/mail; in person meetings; virtual meetings; email; website, and social media	<p>During project preparation and throughout implementation</p> <p>In three Project countries</p>	PIU

Information to be disclosed or consulted on	Target Stakeholders	Messages/ Agenda	Methods of Communication and Consultation	Timetable: locations / dates	Responsibility
	Republic of Kazakhstan Ministry of Ecology and Natural Resources Turkmenistan Ministry of Environment Protection Members of the academia Staff of Technical Agencies Private sector companies CSOs/NGOs Fishery Committees Existing committees of the Tehran Convention Tehran Convention Interim Secretariat (TCIS) Relevant national institutions Affected landholders Community members/vulnerable groups				
THROUGHOUT THE PROJECT					
Project progress reports	UNEP World Bank Project Regional Steering Committee(s) Project Technical Advisory Committee National BCSP Focal Points (govt): Republic of Azerbaijan Ministry of Ecology and Natural Resources Republic of Kazakhstan Ministry of Ecology and Natural Resources Turkmenistan Ministry of Environment Protection Members of the academia Staff of Technical Agencies Private sector companies CSOs/NGOs Fishery Committees Workers of affected industries	Quarterly reports General information on Project activities and Project performance Updates to Project instruments	Phone/mail; in person meetings; virtual meetings; email; website, and social media	Throughout Project implementation In three project countries	PIU

Information to be disclosed or consulted on	Target Stakeholders	Messages/ Agenda	Methods of Communication and Consultation	Timetable: locations / dates	Responsibility
	Existing committees of the Tehran Convention Tehran Convention Interim Secretariat (TCIS) Relevant national institutions				
Information on GRM	Members of the academia Staff of Technical Agencies Private sector companies CSOs/NGOs Fishery Committees Existing committees of the Tehran Convention Tehran Convention Interim Secretariat (TCIS) Relevant national institutions Local Government entities Affected landholders Community members/vulnerable groups	Access information for GRM	Phone/mail; in person meetings; website, and social media	Throughout Project implementation In three Project countries At sites of implementation	PIU
Project activities ESMPs and Resettlement Action Plans (RAPs)	Members of the academia Staff of Technical Agencies Private sector companies CSOs/NGOs Fishery Committees Existing committees of the Tehran Convention Tehran Convention Interim Secretariat (TCIS) Relevant national institutions Local Government entities Affected landholders Community members/vulnerable groups	Planned local activities Potential site-specific E&S plans	Phone/mail; in person meetings; website, and social media	Throughout Project implementation In three Project countries At sites of implementation	PIU

4.4 Engagement with Disadvantaged and Vulnerable Groups

Disadvantaged or vulnerable refers to individuals and groups that are more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of the project benefits. Such an individual/group are also more likely to be excluded from/unable to participate fully in the consultation processes and as such may require specific measures and/ or assistance to do so.

Considering the regionality of the Project and its policy-related activities, local stakeholders, such as local NGOs and local communities shall be considered among vulnerable groups. This may include - but not be limited to - the following: households whose livelihoods mainly depend on sea-related activities such as fishing, households affected in their access to resources through expansion or creation of PA, workers of affected industries, fishing communities, women-headed households, persons with disabilities, elderly people, youth, children, etc.

The Project will adopt a pro-active approach in involving vulnerable groups in project activities, which starts with careful screening of stakeholders from the local level. The PIU will ensure that local business associations and local NGOs are included in country-specific activities, and additional engagement tools such as focus group meetings, face-to-face interviews are described for the individuals who are not represented via these organizations.

4.5 Timelines

Information disclosure and consultations are especially relevant throughout the early stages of the Project, but also throughout the project cycle. The Project design has therefore been based on in-depth consultations. Site-specific or individual activities under Component 2 will include further consultations prior to their commencement to ensure transparency and accountability on project modalities, and to allow stakeholder voices to form the basis of the concrete design of every intervention and consultations will continue throughout the Project cycle.

4.6 Review of Comments

The PIU will compile all stakeholder comments and inputs originating from the different consultations to ensure that the Project has general information on the perception of stakeholders and their concerns, and for the Project to remain on target. It will be the responsibility of all implementers to respond to comments and inputs, and to keep open a feedback line to the stakeholders.

Training on ESS facilitated by WB will be provided soon after the Project becomes effective to ensure that all implementing staff are equipped with the necessary skills.

5. Estimated Costs for SEP Implementation

UNOPS will be managing and implementing the SEP. Adequate resources for the implementation of stakeholder engagements, including the GRM, will be covered by the budget assigned under the Project management activities. UNOPS will as part of the annual workplans allocate adequate budget to undertake the required stakeholder engagement and implement the GRM noting the need for human and material resources will be required to implement the plan at all levels.

Table 3 Indicative Budget for implementation of SEP

Stakeholder Engagement Activity	Total Cost (USD)
Social experts	
E&S Specialist (30% of time for implementation of SEP for 4 years)	115,000
Consultation and disclosure	
Consultation sessions and outreach activities 20 events (1,000 USD/event) including field travel per year (= 40,000 USD) x 3 countries (120,000 USD) x 4 years	240,000
IEC and project information material and social media campaign	5,000
Project launch meetings 5,000 USD x 3 countries	15,000
Grievance redress mechanism	
GRM Costs	40,000
Dissemination of information on GRM / awareness raising sessions 5 x 2,000 USD in 3 countries	30,000
TOTAL	445,000

6. Grievance Redress Mechanism (GRM)

6.1 Objectives

The objective of the GRM is to allow an avenue for project stakeholders to comment on or express concern on matters relating to project implementation as well as PA implementation. In addition, it is intended to allow various stakeholders to pass important information to higher levels of project oversight and management in a neutral and, if necessary, anonymous way.

The GRM is based on six core principles:

Fairness: Grievances are treated confidentially, assessed impartially, and handled transparently.

Objectiveness and independence: The GRM operates independently of all interested parties to guarantee fair, objective, and impartial treatment in each case. GRM officials have adequate means and powers to investigate grievances (e.g., interview witnesses, and access records).

Simplicity and accessibility: The GRM does not use complex processes that create confusion or anxiety.

Responsiveness and efficiency: The GRM is designed to respond to all complainants' needs. Accordingly, staff handling grievances are trained to take effective action and respond quickly to grievances and suggestions.

Speed and proportionality: All grievances, simple or complex, are addressed and resolved quickly. The action taken is swift, decisive, and constructive.

Participation and social inclusion: A wide range of stakeholders is encouraged to bring grievances and comments to the attention of the Project staff. Special attention is given to ensuring that marginalized groups are able to access the GRM.

6.2 Approach to address grievances

This section guides the management of complaints and grievances under the Project. The purpose of this GRM is twofold: on the one hand it is to provide a centralized Project GRM where stakeholders of the Project can lodge their feedback, complaints, and grievances in regard to the general Project and have these resolved. World Bank-supported projects are required to facilitate mechanisms that address concerns and grievances arising from a Project. One of the key objectives of ESS10 (Stakeholder Engagement and Information Disclosure) is 'to provide project-affected parties with accessible and inclusive means to raise issues and grievances and allow borrowers to respond and manage such grievances'.³ On the other hand, it includes a GRM level that handles PA-related grievances, and that can assist in building a GRM for the PA, beyond the duration of the Project.

A 'PA GRM' shall initiate a local level mechanism that caters for grievances related to specific PAs that are established or expanded under the Project. The aim of the Project is that these PA GRM will become part of the PA management function and will be taken over by the respective Government as part of the current and future PA management. While during the Project implementation, both GRM are included as part of the Project, it is anticipated that the PA-level GRM will go beyond the duration of the Project.

A centralized Project GRM, where stakeholders of the Project can lodge their feedback, complaints, and grievances in regard to the general Project and have these resolved.

As per World Bank ESS, both GRM make the following distinctions:

- a) Project-related grievances: it focuses on project-related complaints and grievances and defines the different steps of handling such.
- b) Sexual Exploitation and Abuse (SEA) / Sexual Harassment (SH) related grievances: grievances related to SEA/SH, given their sensitivities and special considerations, are reported to the Project GRM, but the grievances follow a different process. This counts for grievances from stakeholders and workers deployed by the project, other than those working in the PIU.
- c) Labor-related grievances: Grievances from project workers raising workplace concerns, terms of employment, and other related concerns shall be reported through the respective institutional channels or shall be filed through the GRM.
- d) 2nd Tier / Appeals mechanism: Grievances that cannot be solved by the first tier or have been escalated by complainants dissatisfied with the responses from the GRM. The Project GRM describes procedures addressing these grievances through an appeals mechanism.

This section outlines clear processes and procedures (including resolution processes and timelines), defines the grievance uptake, sorting and processing, acknowledgment and follow-up, categorization, verification, and investigation, monitoring & evaluation, and feedback for both GRM.

6.3 Grievance Redress Procedures

The PIU will ensure the information about the GRM is disseminated among all project stakeholders, including government entities, academia, CSOs/NGOs, private sector entities, etc. Means of communication are defined in the information dissemination strategy in the SEP. In addition, the PA-level GRM will be disseminated based on the needs of the specific stakeholders around each PA, as further defined in the Process Framework.

Step 1: Grievance Uptake

- a) Project GRM

The Project GRM provides the following means for people to file a grievance:

Online mechanism: An online mechanism will allow people to leave a message and request a call back from the Project. The mechanism will be clearly visible on the website. The PIU E&S Specialist will respond to the request for the call back via the online form. The Specialist will also register the grievance in a grievance log. After providing appropriate responses to the complainant and registering the

grievance, the Specialist will transfer the grievance to the relevant entity responsible for the grievance-related activity.

Email address - an email address will be set up by the PIU and posted on the Project website, and/or the website must provide a way to file a grievance. The online mechanism will be administered by the PIU E&S Specialist. Grievances can be filed in writing through this method. The Specialist will register grievances in the grievance log.

b) PA GRM

On site suggestion box – There will be suggestion boxes installed at relevant locations, such as community centers or government offices. This will allow the direct local submission of grievances or feedback for community members, especially members of vulnerable groups that may not have other means to communicate.

Local phone number – The authority responsible for the PA will be encouraged to set up a local phone number in order to receive grievances through phone calls in relation to the PA.

c) General

Details of Grievance logged: While grievances can be submitted anonymously, the more information is made available, the better the Project or the PA administrative authority can respond to the grievances, investigate the matter where necessary, or provide feedback to the aggrieved party. The minimum information that should be made available is the following (except for SEA/SH cases, which follow a different process as described below):

Table 4 Details of Grievance log

1) Name of complainant	
2) Decision and consent of complainant on whether the identity of the complainant should remain confidential or can be made available where necessary	
3) Contact details: physical address, telephone number, email address	
4) Details of the grievance: <ul style="list-style-type: none">- What happened- Where did it happen- Parties involved- Time when it happened- Description of the case- Supporting documents if available.	

Submission of incomplete information for a grievance may not allow a case to be investigated or may delay investigations.

GBV/SEA/SH-related Grievance: Given the sensitive nature of GBV-related complaints, the GRM provides different ways to submit grievances and applies the survivor-centered approach. All grievance uptake channels can be used to report on SEA/SH-related grievances. The PIU or PA Officer receiving grievances

will be trained in the handling and processing of SEA/SH-related grievances. Information on relevant legislation will be delivered to survivors before disclosing case details.

Confidentiality: The grievance recipients and anyone handling the SEA/SH-related grievances must maintain absolute confidentiality in regard to the case. Maintaining confidentiality means not disclosing any information at any time to any party without the informed consent of the person concerned. There are exceptions under distinct circumstances, for example, a) if the survivor is an adult who threatens his or her own life or who is directly threatening the safety of others.

Informed Consent: The survivor can only approve a case's processing when he or she has been fully informed about all relevant facts. The survivor must fully understand the consequences of actions when providing informed consent for a case to be taken up. Asking for consent means requesting the permission of the survivor to share information about him/her with others (for instance, with referral services), and/or to undertake any action (for instance, investigation of the case). Under no circumstances should the survivor be pressured to consent to any conversation, assessment, investigation, or other intervention with which she/he feels comfortable. A survivor can also at any time decide to stop consent. Where possible, the consent form can be used (in cases of direct person-to-person reporting). By signing this form, the survivor can formally agree (or disagree) with further processing the case. The form will clearly state how the information will be used, stored and disseminated. If a survivor does not consent to share information, then only non-identifying information can be released or reported on.

Step 2: Sort and Process

a) Project GRM

The grievances registered online and through the email mechanism will be sorted and processed by the E&S Specialist at the PIU. After the E&S Specialist has received and registered the complaint, he/she will categorize the complaint.

For grievances handled under the general Project GRM, the project will establish a Project Grievance Redress Committee (GRC) at the PIU level, consisting of the E&S Specialist, the Project Manager and one other selected Officer or any other relevant unit or officer or a national Focal Point where applicable. The E&S Specialist will share all necessary information with the Project GRC. Grievances handled elsewhere (e.g., at the court) will be excluded, records for the same will be maintained by PIU.

The E&S Specialist will transfer the grievance information into a more comprehensive grievance register. It will maintain a central grievance register for logging, managing, monitoring, and reporting grievances. All cases will be treated confidentially.

b) PA-level GRM

For grievances registered at the PA level in the respective countries, through suggestion boxes or other appropriate means, a GRM Focal Point will be appointed in the local authority that is responsible for the PA management. The GRM Focal Point will register the grievances and will assist in the formation of a PA Grievance Redress Committee (local GRC). The PA GRC should consist of relevant staff or government

counterparts responsible for PA management, as well as representatives of the local communities and civil society organizations. The constitution of the PA GRC will be decided at the PA level prior to the commencement of project activities. The GRM Focal Point will share the registered grievances with the PA GRC during the sorting and processing step.

c) General

SEA/SH Cases: Under both GRM, all reporting will limit information in accordance with the survivor's wishes regarding confidentiality and in case the survivor agrees on further reporting, information will be shared only on a need-to-know-base, avoiding all information that may lead to the identification of the survivor and any potential risk of retribution.

Referrals are a process through which the survivor gets in touch with professionals and institutions regarding her or his case. Services can include health, psycho-social, security and protection, legal/justice, and economic reintegration support. The E&S Specialist will provide the survivor with contacts of the available referral services in the respective area. If the survivor wishes for any assistance with transport or payment for services, the grievance recipient will provide allowances. Referral services are provided even in cases where the survivor opts to not pursue the case through the GRM or through legal channels.

Step 3: Acknowledgement and Follow-Up

a) Project GRM

The E&S Specialist will carry out an initial screening review and confirm that the grievance is (i) a matter related to the Project; and (ii) a substantive issue that can be investigated. Any grievances that do not relate to the Project will be passed to the relevant institution. The E&S Specialist will prepare a response (i) acknowledging that the grievance has been received; (ii) notifying the complainant of what action will be taken; and (iii) stating the rights of the complainant.

At all times, the E&S Specialist will provide a response/acknowledgement of reception of the grievance promptly to the aggrieved party (unless the case was filed anonymously), within a maximum of five working days after the grievance is filed. A response can be provided over the phone, in writing or through the community facilitators. A response / acknowledgement can also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given

to the concerned persons bilaterally.

All responses are documented and categorized for reporting and follow-up if necessary.

b) PA GRM

At the PA level, the GRM Focal Point will carry out an initial screening review and confirm that the grievance is (i) a matter related to the Project or to the PA or both; and (ii) a substantive issue that can be

investigated. Any grievances that do not relate to the Project will be handled at the PA level. Grievances related to activities funded by the Project will also be handled at this level, but they will be recorded and shared with the PIU. The GRM Focal Point will prepare a response acknowledging that the grievance has been received, notifying the complainant of what action will be taken and stating the rights of the complainant.

At all times, the GRM Focal Point will provide a response/acknowledgement of reception of the grievance promptly to the aggrieved party (unless the case was filed anonymously), within a maximum of five working days after the grievance is filed. A response can be provided over the phone, in writing or through the community facilitators. A response can also be communicated through stakeholder meetings and beneficiary meetings during Project activities. For sensitive issues, feedback is given to the concerned persons bilaterally .

Step 4: Verify, Investigate and Act

a) Project GRM

The E&S Specialist will verify the case, as appropriate. Verification includes:

- Check for the complaint's eligibility (objectively based on set standards and criteria) regarding its relevance to the project. Refer to the PAD, POM, ESMF, sub-project agreements, or other documentation to determine the validity of the grievance.
- Escalate outright grievances that require specific interventions, such as SEA/SH cases.
- Refer grievances outside of the Project's jurisdiction (e.g., refer to relevant external institution), for example where a grievance relates to a different project.

The PIU GRC, where applicable, will investigate the grievance. The investigation may include interviewing the complainant(s), project staff, and other stakeholders; and inspecting physical evidence and documents. All project staff must cooperate with the investigation, including sharing documents where necessary. If the complainant has requested to remain anonymous, the investigator(s) must not do anything that results in the disclosure of the complainant's name. Independent investigator(s) make no recommendation other than reporting the facts.

b) PA GRM

The PA GRC will investigate the grievance where necessary. The investigation may include interviewing the complainant(s), project staff, and other stakeholders; and inspecting physical evidence and documents. All project and PA staff must cooperate with the investigation, including sharing documents where necessary. If the complainant has requested to remain anonymous, the GRC must not do anything that results in the disclosure of the complainant's name. The PA GRC review the results and make final decisions for a resolution of the case, which is then communicated to the aggrieved party.

c) General

The investigation includes the following steps:

- Collect basic information (reports, interviews with other stakeholders while ensuring triangulation of information, photos, and videos).
- Collect and preserve evidence.
- Analyze to establish facts and compile a report.

The responses will include the following elements and will be based on the following timelines

Table 5 Typed of GRM actions and timelines as per type of case

Type of Case	Actions Required	Response Required
Straight-forward cases with little anticipated complications	Minimal checks and consultations by GRM Focal Point or E&S Specialist	<ul style="list-style-type: none"> - GRM Focal Point or PIU E&S Specialist to acknowledge reception of the grievance, detail follow-up steps and set timelines (number of days) for follow-up activities: verify, and communicate outcomes and next steps based on outcomes - 1-3 days
Cases that require some minimal processes of verification and clarification	Analyze existing information and request clarification if necessary - GRM Focal Point or PIU E&S Specialist	<ul style="list-style-type: none"> - GRM Focal Point or PIU E&S Specialist to acknowledge reception of the grievance, detail the steps to follow, communicate outcomes - 7 -14 days
Cases that require investigation	Access and review of relevant documentation (reports, policy documentation), field-based fact findings missions (visits and interviews), analysis and preparation of reports, consultative sessions to rectify or adjust the implementation approaches – by PA GRC or PIU GRC.	<ul style="list-style-type: none"> - GRM Focal Point or PIU E&S Specialist to acknowledge reception of the grievance, provide follow-up steps and set timelines for a comprehensive response, initiate investigations, communicate response - 14 to 21 days
Cases that require escalation	GRM Focal Point to transfer case to the PA management; E&S Specialist to transfer case to Project Manager.	<ul style="list-style-type: none"> - GRM Focal Point or E&S Specialist to acknowledge reception of the grievance, provide the need for escalation of the grievance to the next level, and set timelines for a comprehensive response - 7-14 days
Cases that require referral to other institutions	PIU or PA authority to transfer case to relevant institution (National Police Service, Judiciary)	<ul style="list-style-type: none"> - GRM Focal Point or E&S Specialist to acknowledge reception of the grievance, provide the need for

		referral of the grievance to an appropriate institution, and set timelines for a comprehensive response on referral progress - 7 – 21 days
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SEA/SH Cases: If a project worker allegedly committed the SEA/SH grievance, the grievance will be reported to the UNOPS Internal Investigation and Audit Group (IAIG) for further processing.

Where the survivor has opted to take a formal legal route with the case, the PIU will ensure that the survivor has all the support required to file a lawsuit in court. The GRM process will still proceed with the survivors' consent. Ensuring due process is a matter of the formal justice system and not the grievance handlers. Unlike other types of issues, it is not part of the GRM's remit to conduct investigations, make any announcements, or judge the veracity of an allegation. The GRM should refer the case to the domestic regulatory framework to process the claim if the consent of the survivor is received.

Case closure requires a) the case has been referred to GBV service providers (if the survivor consented) for support and appropriate actions, and appropriate actions have been taken against the perpetrator according to SEA mechanisms; b) the service provider has initiated accountability proceedings with the survivor's consent.

Step 5: 2nd Tier / Appeals Mechanism

a) Project GRM

If a complainant is dissatisfied with the response and solution provided by the Project GRC, he or she has the right to appeal. The appeal must be made in writing within 20 days of receipt of the decision. The purpose of the request is to provide an independent view of the complaint and to review the decision through an appeals body. the complainant can appeal to the UNOPS Multi Country Director, who will be engaged at critical points and will identify a representative who will be involved and follow the process. In both cases, appeals processes should be completed withing 21 days.

b) PA GRM

If a complainant is dissatisfied with the response and solution provided by the PA GRC, he or she has the right to appeal to the Project GRC. The appeal must be made in writing within 20 days of receipt of the decision. The purpose of the request is to provide an independent view of the complaint and to review the decision through the Project GRC. The PIU E&S Specialist shall receive the written appeal to decide on the request, and advise the complainant in writing on the outcome of the appeal.

If a complainant is dissatisfied with the response and solution provided by the Project GRC, the complainant can appeal to the UNOPS Multi Country Director, who will be engaged at critical points and will identify a representative who will be involved and follow the process. In both cases, appeals processes should be completed within 21 days.

Step 6: Monitor, Evaluate and Provide Feedback

a) Project GRM

The PA GRM will report all Project-related cases to the Project GRM. The Project GRM will include those cases in its Project monitoring and reporting mechanisms.

Recording: The PIU will record all complaints and ensure their status is updated in internal recordings. Public records will be provided on the status, timeframe, feedback, resolution of complaints, and summary reports. The information on complaints will be used for the project to improve its effectiveness.

Monitoring: The PIU has developed indicators and a methodology for monitoring the steps of the GRM value chain, tracking grievances, and assessing the extent to which progress is made to resolve them. The PIU may amend indicators as necessary. The following indicators will be applied:

Table 6 Indicators and targets

Indicator
IR3.1 Number of GRM awareness campaigns conducted (Number)
IR3.2 Percentage of grievances responded to within the stipulated timeline (Percentage)
IR3.3 Percentage of grievances resolved within the stipulated timeline (Percentage)
IR3.4 Percentage of grievances referred/ escalated timely (Percentage)

Reporting: The PIU will report on the status of all GRM cases and on the above indicators, as well as provide a trend analysis to the Bank every quarter – as part of the regular Project Progress report.

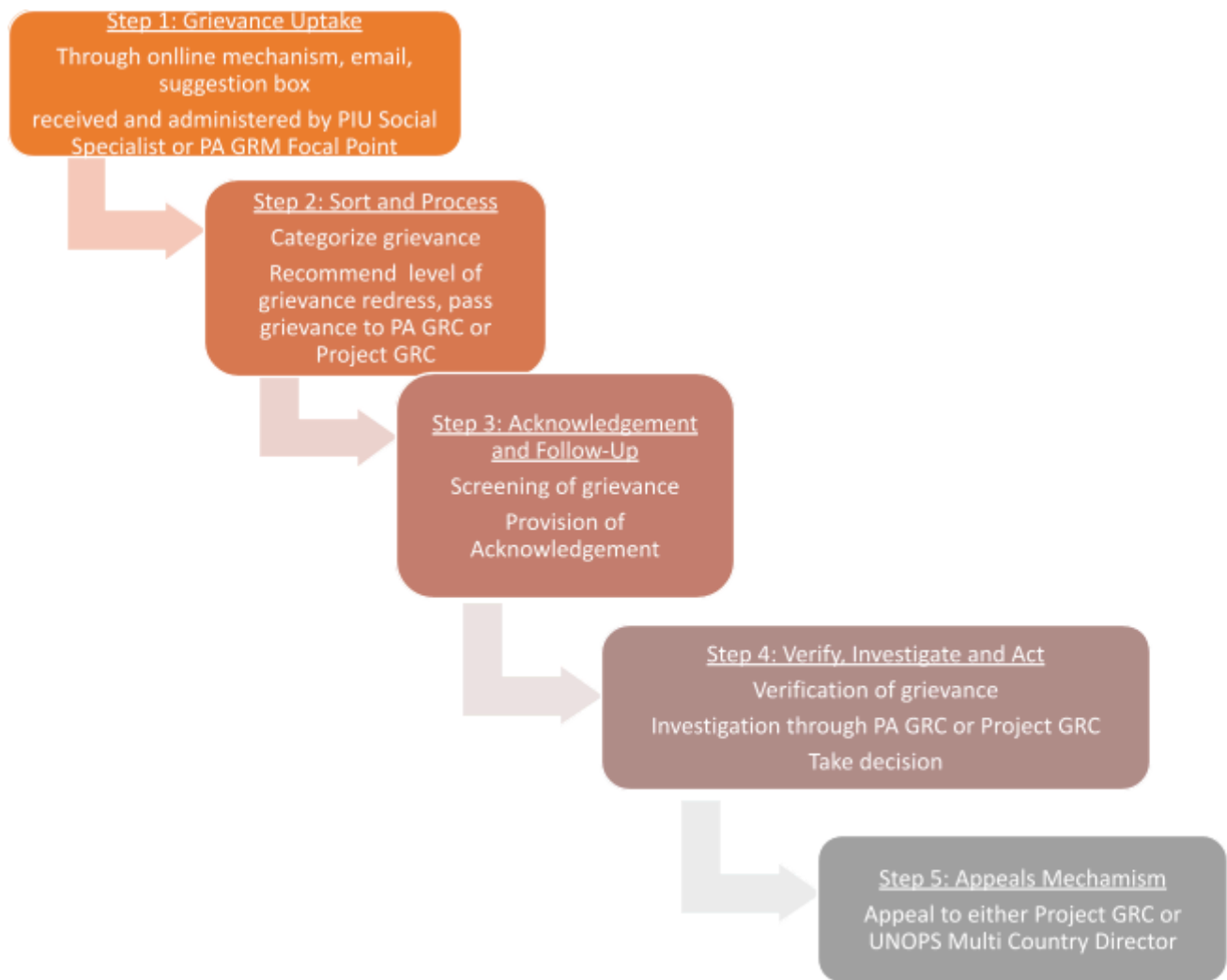


Figure 2 Flowchart GRM

7. MONITORING AND REPORTING

Inclusive and participatory monitoring minimizes misconceptions and misunderstandings about the Project and maintain a positive perception about the Project. The SEP will be monitored based on both qualitative reporting and quantitative reporting linked to results indicators on stakeholder engagement and grievance performance. Monitoring will verify compliance and effectiveness of the SEP and application of the recommended standards, stakeholder engagement and implementation of the GRM.

SEP reporting will include the following:

- Progress reporting on the SEP commitments under the Environmental and Social Commitment Plan (ESCP)
- Cumulative qualitative reporting on the feedback received during SEP-related events, in particular
 - a. issues that have been raised that can be addressed through changes in project scope and design, and reflected in the basic documentation such as the PAD or E&S instruments if needed;
 - b. issues that have been raised and can be addressed during project implementation;
 - c. issues that have been raised that are beyond the scope of the project and are better addressed through alternative projects, programs or initiatives; and
 - d. issues that cannot be addressed by the project due to technical, jurisdictional or excessive cost-associated reasons.
- Quantitative reporting based on the indicators included in this SEP.

As evidence, minutes of meetings can be used that summarize the views of the attendees can be annexed to the monitoring reports.

The E&S Specialist in the PIU, jointly with the M&E Specialist will conduct monitoring activities and will prepare reports for E&S implementation as part of the Project Progress Report prepared by the PIU. In the review process, the PIU and the collaborating governments will play the lead role in coordinating the process with key stakeholders. These quarterly reports will further be shared with all stakeholders, as defined in the SEP.

Results of stakeholder engagements will be regularly reported back to the stakeholders. It will be the responsibility of the PIU to ensure that all relevant reporting is shared through the above defined public means.

Adequate institutional arrangements, systems and resources will be put in place to monitor the implementation of the SEP. The main monitoring responsibilities will be with the PIU. They will be led by the PIU E&S Specialist. The PIU Project Manager will be overall responsible for the implementation of the SEP, as well as for monitoring and inspections for compliance with the SEP.

Indicators for the monitoring of the SEP implementation will be as follows:

Table 7 SEP Indicators

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GRM. To what extent have project-affected parties been provided with accessible and inclusive means to raise issues and grievances? Has UNOPS responded to and managed the grievances?	<ul style="list-style-type: none"> • Are project affected parties raising issues and grievances? • How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> • Usage of GRM • Requests for information from relevant entities. • Use of suggestion boxes placed in the communities. • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	Records from the implementing entities
Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected 	Stakeholder Consultation Attendance Sheets/Minutes Social media/traditional media entries on the project results

		<p>in project design and implementation.</p> <ul style="list-style-type: none"> • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	
<p>Implementation effectiveness.</p> <p>Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Face-to-face meetings discussions with Vulnerable Groups or their representatives</p>

Annex 1: Details of Stakeholder Consultations and Participants List

Stakeholder Consultation details:

A joint scoping mission was conducted by the World Bank and the United Nations Environmental Program Tehran Convention Interim Secretariat (UNEP TCIS) in Azerbaijan from 16-18 May 2024 in order to discuss the utilization of the GEF for the Project with key governmental stakeholders. The stakeholder consultations were targeted to define the Project's interventions and identify focus areas. An orientation meeting was held with the Ministry of Ecology and Natural Resources (MENR). As well as a one-day stakeholder workshop, which was facilitated by MENR. The workshop included government agencies, civil society, academia, and members of the private sector (see SEP for details of stakeholders). A field trip was undertaken to the Samur-Yalama National Park, and to a trout fishery farm located next to the park.

Key issues discussed during the consultations were the application of the Bank's Environmental and Social Framework (ESF), which will include the preparation of an ESMF, LMP, RPF and ESCP to mitigate the Project's E&S risks and impacts. The government further expressed its interest in the funding of international expertise to help bring respective ongoing initiatives in Azerbaijan to scale, including the understanding of integrated coastal management and maritime spatial planning tools. The government further stated that it is working to expand four of its protected areas, namely Samur-Yalama National Park, Gizilaghaj National Park, Absheron National Park, and Hirkan National Park. The Bank team and the Government discussed several options for the project to support these ongoing efforts on biodiversity conservation, which can potentially include assistance with: the expansion of the marine part of the Samur-Yalama National Park, located in the north of the country, or possibly another national park such as Absheron; the elaboration of management plans for selected protected areas, applying more effective protected area management practices through the promotion of sustainable ecotourism practices; and the development of exchange platforms for national parks managers from the three participating countries with dedicated capacity-building sessions. The government further expressed interest in improving pollution monitoring in the Caspian Sea, specifically: i) identifying the most suitable locations for monitoring stations, ii) supporting offshore monitoring by purchasing equipment for a monitoring vessel, iii) developing a legal framework for pollution monitoring following international standards, iv) developing guidance/methodology on coastal clean-up from oil exploration activities, v) supporting cross-learning among the participating countries and other regions on the monitoring of the marine environment, and vi) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment.

Another joint scoping mission was conducted by the World Bank and the UNEP TCIS in Kazakhstan, from 20-24 May 2024. Key issues discussed during the consultations were also the application of the Bank's Environmental and Social Framework (ESF), including the preparation of an ESMF, LMP, RPF and ESCP to mitigate the Project's E&S risks and impacts. Furthermore, the team visited the Karagiye-Karakol'skiy Gosudarstvennyy Zakaznik, as well as the Port of Aktau to assess the potential inclusion of the former into the project and consult with the Port. Subsequently, a meeting was convened by the Oblast Akimat (governor of the province) with the participation of the respective local stakeholders to discuss their role in the project preparation. Following the meeting, the team visited Kendirli Bay, which is a natural reserve of the Oblast, located close to the border of Turkmenistan, to assess a potential inclusion of the work on this reserve in the project. On the last day of the visit to Aktau, the team met with representatives of the local fishery association to discuss their role in the conservation of marine

resources. In Astana, a one-day workshop was held with stakeholders from the government, civil society, and academia to present and discuss the project's objectives and timeline, the WB ESF and the proposed institutional arrangements for the project.

In view of biodiversity protection, the Government of Kazakhstan is working to expand Kazakhstan's PA surface. A new marine PA is to be established next to Port Shevchenko to enhance the conservation of the Caspian Seal. The government is also considering the expansion of existing protected areas and to this end, more scientific research is required to identify the rationale for new protected areas from ecological and biological perspectives. The government is also working on applying more effective PA management practices while promoting sustainable ecotourism practices. It expressed that the project could provide assistance in elaborating the management plans of selected existing or new PAs.

The government expressed interest in improving Caspian Sea pollution monitoring, specifically i) increasing the monitoring potential of the Kazhydromet, which is responsible for the state monitoring of the Caspian Sea environment; ii) supporting the monitoring of sea-based pollution (from offshore oil and gas exploitation and maritime transport) by purchasing satellite images and integrating them with the national monitoring structure and procedures; iii) developing a legal framework for pollution monitoring that follows international standards; iv) supporting cross-learning among the participating countries; and v) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment. The Caspian Sea Institute in Aktau is expected to also carry out relevant scientific research on the drivers, pressures, and measures related to pollution of the marine environment of the Caspian Sea.

The joint WB and UNEP TCIS team further undertook consultations in Turkmenistan from 11-15 August 2024. The objective was to discuss with key government stakeholders the scope of the Turkmenistan part of the proposed Project.

At the invitation of the Ministry of Environment Protection (MEP) and Ministry of Foreign Affairs (MFA) of Turkmenistan, the team attended the International Caspian Day held in the city of Turkmenbashi. In Turkmenbashi, the mission attended a round table facilitated by the MEP to discuss the project's potential interventions and identify areas of focus with related government agencies, academia, civil society and fish production units. Beyond the project's interventions the mission presented and discussed the ESF requirements. Together with MEP, the team visited the Khazar State Reserve and the laboratory of the Caspian Ecological Control Service under MEP.

The government expressed that it is working to expand Turkmenistan's PA surface. The government is considering the expansion of existing PAs and to this end, more scientific research is required to identify the rationale for the expansion of the PAs from ecological and biological perspectives. The government is also working on applying more effective protected area management practices while promoting sustainable ecotourism practices. The government also indicated the need for assistance in developing National Convention Action plan under the Tehran Convention as well as law enforcement and harmonization activities.

The government expressed interest in improving Caspian Sea pollution monitoring, specifically i) increasing the monitoring potential of the CaspEcoControl Service by improving the capacity and providing measuring methodologies of the laboratory facilities which would be aligned with ones of other Caspian countries; ii) supporting the monitoring of sea bottom sediments; iii) developing a legal

framework for pollution monitoring that follows international standards; iv) supporting cross-learning among the participating countries; and v) supporting the activities of the Working Group of the Tehran Convention on Monitoring and Assessment.

From 15 – 30 April 2025, the World Bank and UNOPS undertook a Technical Mission to all three countries with the objective to confirm all elements of project design, including the prepared draft E&S instruments. The team met with the Ministry of Ecology and Natural Resources (MENR) in Baku, Azerbaijan; the Ministry of Ecology and Natural Resources (MENR) in Aktau, Kazakhstan; and the Turkmenistan Ministry of Environmental Protection (MEP). The mission included site visits to Absheron National Park in Azerbaijan and to Fort Shevchenko, Kazakhstan, for visual inspection of the sites and discussions on stakeholder risks associated with protected areas management.

The mission confirmed the following the countries: Project PDO, indicators, components and activities; Budget allocation; Implementation and governance arrangements (incl. implementation arrangements between UNOPS and the three countries); Provisions, content, and consultation requirements for the Project's ESF Instruments; Location and areas of Marine Protected Areas (MPA) to be supported by countries and related risks. Based on mission meetings, site visits, and Google Earth views, the Bank engagement in these MPAs is assessed as Low to Moderate risk and will be reviewed when the MPA Profiles have been completed.

The Government of Azerbaijan confirmed the priority activities to strengthen the pollution monitoring capacity at the Caspian Environmental Monitoring Unit under the Ministry of Ecology and Natural Resources. Biodiversity: The Government confirmed that a new MPA in the marine area surrounding "Absheron National Park" would be created for a focus on biodiversity, including knowledge/studies to better understand how the habitat for migratory birds, Sturgeon, and Caspian seal.

he government of Kazakhstan expressed interest in improving Caspian Sea pollution monitoring by supporting the recently created Kazakh Scientific and Research Institute of the Caspian Sea (KSRICS) located in Aktau. The mission visited the building provided by the government for the institute. On October 24, 2024, Kazakhstan adopted a resolution to create the "Caspian Itbalygy State Nature Reserve". The project would support the development of the management plan of the MPA in which studies would clarify what management measures are needed to benefit the Caspian seal which is an endemic, migratory and a transboundary bioresource.

Turkmenistan requested the Caspian Environmental Control, which is responsible for monitoring that associated laws are respected in practice. For this, the pollution monitoring capacity needs to be strengthened in pollution surveyance, including revision of the pollution monitoring and reporting scheme, and equipment provided to the Caspian Environmental Control Service in Turkmenbashi. The government has decided to create a new protected area named "Garabogaz Wildlife Sanctuary" as protected habitat for Caspian seal and migratory birds, and for which the project will support the preparation of the management plan.

Furthermore, UNOPS undertook stakeholder consultations from March-April 2025. In Turkmenistan a stakeholder consultation meeting was held 28-29 April in Turkmenbashi City. More than 40 participants attended the workshop, including representatives of State enterprises in Turkmenbashi: Turkmenbashi Oil Refinery Plant (TORP), departments of the ministry in the Balkan velayat, "Turkmenchemistry" State Corporation, representatives of the Khyakimlik (city administration), representatives of public associations, NGOs, the Nature Conservation Society of the Balkan velayat (region), fishermen, local

citizens, etc. The audience was very interested in environmental issues and solutions to these issues. Participants expressed a desire to have more such meetings and discussions.

Stakeholder meetings in Azerbaijan were held between 2-8 April 2025, including with the Ministry of Ecology and Natural Resources, State Agency on Water Resources, the Institute of Geography, Ekolife Public Union, Public Council under the MENR, Nardaran Community, the 'My Beach' Hotel in Novkhani, and the Amuran Resort. During the consultations, the Ministry pointed out that there is inadequate coordination among countries and insufficient data sharing, as well as a low interest from stakeholders to cooperate with government institutions. It recommended that the role of local communities in decision-making should be increased.

In terms of social risks, the Ministry anticipates that due to potential closures of polluting industries, unemployment may occur. There is a need to diversify income sources and rely more on sustainable incomes, like environmental tourism. In case there are reduced fishing opportunities for local populations due to PAs, designated fishing grounds should be established in alternative areas with sustainable fishing opportunities, for example an increase of fish farms. Furthermore, awareness raising of local communities is very important. The most effective way is to organize an inception meeting. This meeting can ensure the participation of all interested parties. For example, such meetings can be organized in Absheron National Park and on the islands included in the territory of the National Park to be expanded, with local population, fishermen and industrial workers, as well as civil society institutions. The Ministry further named the most vulnerable stakeholders: local communities, some traditional tourism stakeholders, and women.

Research institutions were consulted as part of civil society. They indicated that one of the key challenges to pollution and biodiversity is the lack of infrastructure, informal settlements in areas close to the sea, lack of sewage systems, needs arising from low awareness levels of the local populations, and a lack of good coordination between countries. It is necessary to strengthen cooperation between scientific institutions of the coastal countries and develop various scientific programs related to pollution and biodiversity. Participatory governance should be strengthened in all areas. They recommended that the connection of local communities with the Caspian Sea should be studied. In addition, it should be investigated how pollution and biodiversity problems affect the situation of Caspian coastal communities. For this, it is necessary to conduct surveys or field interviews. Key stakeholders named are NGOs, government, fishermen, oil industry representative, tourism actors. Vulnerable stakeholders are women, local stakeholders, local families with low income.

Private sector entities, including from the tourism sector, were consulted and listed challenges and potential solutions to pollution, including that certain activities can be included through the "polluter pays" scheme. On the other hand, collecting wastewater and treating it through the private sector should also be considered as a solution. Asked to list the E&S risks of the project, they responded that representatives of the private sector and some industries located on the Caspian coast may be concerned that their activities may be suspended. Many tourism facilities need to be renovated, but this must be done in a way that does not cause financial losses to the private sector. A number of job closures could increase unemployment. This is mostly related to polluter industries.

Stakeholder consultations in Kazakhstan were held on 2 April 2025. The meeting included government entities, private sector entities, NGOs, civil society and academia. Government representatives named as

the key challenge: The need to develop a state system of monitoring of pollution and biodiversity of the marine environment of the Caspian Sea. However, it should be mentioned that some measures are already being taken. In particular, on the instructions of the President of Kazakhstan, the Kazakh State Research Institute of the Caspian Sea is being created. Furthermore, there is need to provide appropriate state agencies with specialized sea vessels that would allow them to monitor the state of the Caspian Sea environment. One sea vessel is being built at the expense of the state budget, which will be ready for operation in 2027. There is a lack of modern devices and equipment to control pollution of the marine environment and biological resources of the Caspian Sea

All participants thought there were no E&S risks that would come from the project. All participants noted that the main activities to raise public awareness are related to informing the population about the relevance of the problem of protecting these territories, their importance for the natural environment and the population, as well as awareness the population with the protection measures that the state is taking for conservation of these nature reserves.

Consultations with the Fisheries Committee in Kazakhstan were held on 3 April 2025. The Committee responded that social risks connected to the Project in terms of aquatic biological resources are not envisaged. The main activities to raise awareness among the population include holding regular meetings and public hearings on draft regulations concerning the conservation of biodiversity. Key stakeholders on biodiversity conservation activities include local governments, specialized scientific organizations, as well as environmental and law enforcement agencies. The Committee believes that the best way to consult with stakeholders is to hold joint meetings both offline and online.

The following stakeholders were met during the mission from 15-30 April 2025:

#	Name/surname	Position
1	Mr. Allanazar Kajarov	Leading specialist of the Division of State Environmental Expertise, Licensing, Environmental Certification and Permits of the Ministry of Env. Protection. <i>Focal Point for the project</i>
2	Mr. Jumamyrat Saparmyratov	Institute of Deserts, Flora & Fauna; Academic Secretary; <i>Contact person of the project.</i>
3	Mr. Abdyrakhman Baimuhammedov	Officer of the Department of Coordination of International Environmental Cooperation and Projects; <i>Contact person of the project.</i>
4	Mrs .Gozel Orazdurdyeva	National Consultant
5	Mr.Merdan Mammedov	Hazar State Reserve
6	Mr.Mergen Yusupov	Deputy Head, Department of Coordination of International Environmental Cooperation and Projects, Ministry of Environmental Protection of Turkmenistan
7	Nuryyev Rustem	Head of Flora & Fauna Department Protection
8	Mr Dovran Yagmurov	Head of Environment Protection Department
9	Mr. Alexandr Sherbina	Freelance Consultant for the Hazar State Reserve
10	Mr. Nury Jumashov	Deputy Minister
11	Mr.Nurmyrat Mammedov	Head of the Service, CasEcoControl
12	Ms.Amangul Mammedova	Head of the Service laboratory, CasEcoControl

13	Representatives of the Ministry of Economy and Finance	Names are still identified by the ministry, but you can already send the link.
14	World Bank local Office	VC room number in Ashgabat: Ashgabat WB 08-04 or as a link below Ashgabat_8_304_14_VC_internal_use_only@worldbank.org
15	Mr. Meret Bairamov	Officer of the International projects' coordination Department
16	Mrs. Elena Romantseva	Head of a laboratory of CaspEcoControl

Stakeholders met in Azerbaijan, 16-18 May 2024:

Ministry of Economy of the Republic of Azerbaijan

2. Ministry of Foreign Affairs of the Republic of Azerbaijan

3. Ministry of Ecology and Natural Resources (National Hydrometeorology Service, Caspian Complex Ecological Monitoring Department, State Environmental Security Service Biological Diversity Protection Service)

4. Ministry of Agriculture of the Republic of Azerbaijan

5. Ministry of Digital Development and Transport of the Republic of Azerbaijan

6. Ministry of Science and Education of the Republic of Azerbaijan to the Institute of Geography named after Academician Hasan Aliyev

7. Institute of Zoology of the Ministry of Science and Education of the Republic of Azerbaijan

8. State Border Service of the Republic of Azerbaijan

9. Food Safety Agency of the Republic of Azerbaijan

10. Azerbaijan State Water Resources Agency

11. State Tourism Agency of the Republic of Azerbaijan

12. Azerbaijan Caspian Sea Shipping Closed Joint Stock Company

13. Baku International Sea Trade Port Closed Joint Stock Company

14. State Oil Company of the Republic of Azerbaijan

15. ADA University

16. Baku City Executive Authority

17. Sumgayit City Executive Authority

18. FAO representatives

19. UNDP representatives

20. Samur Yalama National Park

Stakeholders met in Turkmenistan, 20-24 May 2025:

Aigerim Kuat

Director of the Department of International Cooperation, MENR

1. Natalia Ivanovna Dauletiyarova

Acting Director of the Department of Environmental Policy, MENR

1.	Alena Nikolaevna Sakabaeva	Head of the Department of Environmental Policy, MENR
1.	Nurman Nurtasuly Tanatov	Head of the Department of Green Technologies and Projects, Department of Climate Policy and Green Technologies, MENR
1.	Aliya Altaevna Sadvokasova	Chief Expert of the Department of Environmental Policy, MENR
1.	Kuat Khazievich Chumakaev	Chief Expert of the Department of Specially Protected Natural Areas, Committee of Forestry and Wildlife, MENR
1.	Danabek Bakitgereyevich Jangunisov	Head of the Department of State Environmental Control, Committee of Environmental Regulation and Control, MENR
1.	Asem Orazbayevna Bagdauletova	Lead Engineer of the Department of Surface Water Data Analysis, Department of Environmental Monitoring, RSE 'Kazhydromet', MENR
1.	Didar Nurlubekovich Karimssakov	Chairman of the Board, NAO 'International Center for Green Technologies and Investment Projects'
1.	Erlan Edgeevich Tasbaev	Deputy Chairman of the Board, NAO 'International Center for Green Technologies and Investment Projects'
1.	Temirlan Muratkhanovich Atarbayev	Director of the Department of Project Management, NAO 'ICGTIP'
1.	Syrim Seilbekovich Nurgaliyev	Project Manager of the Department of Project Management, NAO 'ICGTIP'
1.	Nurgazy Seilbekovich Abdulmanov	Head of the Digitalization Service, NAO 'ICGTIP'
1.	Aliya Bauyrzhanovna Abdildina	Director of the Department of International Cooperation, NAO 'ICGTIP'
1.	Aidar Maratovich Yesembaev	Chief Expert of the Department of International Cooperation, NAO 'ICGTIP'
1.	Muslim Rysmakhanovich Zhiembaev	Director of the Department of Science and Innovative Technologies
1.	Edil Abraimov	Head of the Department of Innovation Policy
1.	Ayan Kairatovich Bakhiyanov	Deputy Chairman of the Committee of Fisheries

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| 1. | Askhat Zhubayev | Head of the Department of Fish Resources
Reproduction and Scientific Support |
| 1. | Serik Kabdualiyevich Akhmetov | National Liaison Officer with the Tehran Convention |
| 1. | Kanat Kulyzhanov | Deputy Akim of Mangystau Region |
| 1. | Assel Balmanova | Head of the Department of Natural Resources and
Environmental Regulation of Mangystau Region |
| 1. | Arman Muldashev | Head of the Fisheries Department of Mangystau
Region |

1.	Armat Zhussupkaliev	Head of the 'Department of Ecology for Mangystau Region' State Institution
1.	Akzhanis Imanbaeva	Director of the 'Mangystau Experimental Botanical Garden' RSE under the Committee of Science and Higher Education of the Republic of Kazakhstan
1.	Gabas Dosatov	Head of the Mangystau Regional Forestry and Wildlife Inspection
1.	Zhalgas Ustadov	Head of the Science, Information and Monitoring Department, Ustyurt State Nature Reserve
1.	Adilbek Kozybakov	Head of the Human Capital Development Department of the Mangystau Region Chamber of Entrepreneurs, Member of the Public Council of the Ministry of Ecology, Geology and Natural Resources of the Republic of Kazakhstan
1.	Samal Syrlybekkyzy	Caspian University of Technologies and Engineering named after Sh. Esenov
2.	Orinbasar Tokzhanov	Chairman of the Environmental Council under the 'AMANAT' Party Mangystau Regional Branch

Stakeholders met in Turkmenistan 11-15 August 2024:

No	Names/surname	Job title
1	Mr. Nury Jumashov	Deputy Minister, Ministry of Environment Protection
2	Mr. Begench Meminov	Deputy Minister, Ministry of Environment Protection
3	Mr. Berdy Berdyev	Head of the International Department, Ministry of Environment Protection
4	Mr. Mahtumkuli Akmyradov	Advisor, Department of International Cooperation, Ministry of Foreign Affairs
5	Mr. Murad Atajanov	Director of the Caspian Sea Institute
Mr. Rustem Nuryyev		Department of Flora and Fauna Conservation, Ministry of Environment Protection
6	Mr. Juma Saparmuradov	Officer of the Institute of Deserts, Flora and Fauna
7	Ms. Joragul Halbaeva	Chief Lawyer, Ministry of Environmental Protection

8	Mr. Mergen Yusupov	Deputy Head of the International Department, Ministry of Environment Protection
9	Mr. Dovran Yagmurov	Head of the Environmental Protection Department, Ministry of Environment Protection
10	Mr. Rustem Nuryev	Head of the Flora and Fauna Department, Ministry of Environment Protection
11	Ms. Gozel Orazdurdyeva	National Tehran Convention Liaison Officer
12	Ms. Jemal Durdykova	UNDP "Sustainable Cities" Project
14	Mrs. Victoria Akopova	UNDP "Sustainable Cities" Project
15	Mr. Mekan Akmuradov	Turkmenbashi International Port
16	Mr. Nuryagdy Orazgulyev	Turkmenizenyollary Agency
17	Mr. Muhammet Komekov	Turkmenbashi International Port
18	Mr. Nurmyrat Esengulyev	Turkmenizenyollary Agency
19	Mr. Dayanch Aydogdyev	Director of the Hazar State Reserve
20	Mr. Merdan Mammedov	Head of the Scientific Department of the Hazar State Reserve.
21	Mr. Kemal Akhmedov	Ecological service "Caspecocontrol"
22	Ms. Yazgul Khankelova	JSC "Hazarbalyk", Financial specialist
23	Mr. Parahat Shadurdyev	JSC "Hazarbalyk", Safety engineer
24	Mr. Merdan Arazmedov	Nature Protection Society of Turkmenistan
25	Mr. Ovlyakulyev O	Nature Conservation Society of Turkmenistan of the Balkan Velayat
26	Mr. Guvanch Garadzhaev	State Administration for the Protection of Fish Resources and Control of Aquatic Bioresources (Gosrybokhrana) Acting Director of the Balkan Velayat Branch
27	Mr. Bayramgeldy Gylyjov	State Administration for the Protection of Fish Resources and Control of Aquatic Bioresources (Gosrybokhrana), Inspector for small-sized vessels
28	Mr. Nurmyrat Mammedov	Head of the "Caspecocontrol" Service
29	Mr. Ata Chapaev	Head of the Department of Finance and Development of Economic Sectors, Ministry of Finance and Economy
30	Ms. Galina Romanova	Head of the Consolidated Department of Public finance and economic policy, Ministry of Finance and Economy

30	Mr. Maksat Ovezov	Head of Financial Analysis Division of Agro-Industrial Complex, Department of Finance and Development of Economic Sectors, Ministry of Finance and Economy
31	Mr. Jumamuhammet Geldiev	Chief Specialist of the Division of Agro-Industrial Complex, Department of Finance and Development of Economic Sectors, Ministry of Finance and Economy
32	Mr. Khydirmuhammet Orazmuhammedov	Head of the Department of Fishery Facilities, Agency for Economy Risk Mitigation, Ministry of Finance and Economy

UNOPS Stakeholder Consultations in 28-29 April 2025 in Turkmenistan:

List of participants of the meeting for 28-29April 2025 Turkmenbashi:

№	Name/surname	Position
1	Yakhmammedov Balakhmet	Specialist Department of Finance and Economy of the Balkan Velayat, Ministry of Finance and Economy of Turkmenistan
2	Nazarov Guychgylych	Head of Fisheries Protection of the Balkan Velayat
3	Guvadzhayev Sahetgylych	Senior Fisheries Protection Specialist of the Balkan Velayat
4	Begench Tagangeldiyev	Executive Environment Petronas Carigali Sdn. Bhd
5	Kurbanov Ovlyakuli	Chairman of the Nature Conservation Society of the Balkan Velayat
6	Kurbanov Mekan	Specialist of the Nature Conservation Society of the Balkan Velayat
7	Musaev Ashirgeldi	Head of the Hunters and Fishermen Society
8	Shiriev Vepamammed	Chief Specialist of Nature Conservation of the Turkmenbashi Oil Refinery
9	Bagdasaryan Evelina	
10	Arjиков Tuvakdurdy	Chief Specialist of Special Works of the Public Association "Senagat Plastik"
11	Аманклычева Алия	Power Engineer of the Public Association "Senagat Plastik"
12	Mammedov Amanshih	Manager of the Turkmenbashi City Administration
13	Shadzhanov Tachnazar	Specialist of the Turkmenbashi City Administration
14	Ataeva Nurjemal	Chief specialist of the safety department of the state concern "Turkmenhimiya"
15	Kurbanaliev Ashyr	Public Association "Toverek"
16	Tochilina Elena	Head of Laboratory
17	Mammedova Amangul	Head of Laboratory
18	Dosmetov M.	Deputy Director of Individual Enterprise "Deniz Yelkeni"
19	Kakyshova G.	State Inspector "Kaspiekokontrol"
20	Keriyev R.	Hotel Charlak Controller
21	Gylyjov P.	Hotel Charlak Controller
22	Saryev D.	Citizen of Turkmenbashi city
23	Ovezgeldiev G.	Citizen of Turkmenbashi city

24	Markizov Serdar	Citizen of Turkmenbashi city
25	Mammedov Sahetmurad	Khazar State Reserve, Had of the Scientific Department
26	Sherbina Alexander Alekseevich	Freelance Ecologist
27	Kabitov Hummet	Fisherman
28	Geldimammedov K.	Fisherman
29	Nobatov N.	Fisherman
30	Kurbanov K.	Fisherman
31	Orazova G.	Microbiologist
32	Bashimova J.	Accountant
33	Fatellaev V.	
34	Griko Elena	Public Assosiation
35	Zakharova Victoria	
36	Vepaeva Alarm	Public association "Yash tebigatchi"
37	Shikhmadova Leili	
38	Nurmukhammedova Guldzhemal	Director
39	Kupraev Rakhman	Public Association "Ynanch Vepa"
40	Gylyjova Maral	Khazar Balyk
41	Saryguliev Annaberdi	"Gundogar" Public Association
42	Aydogdiev Dayanch	Manager Environment Petronas Carigali Sdn Turkmenistan
43	Orazgeldiev N.	Director of the Khazar State Reserve
44	Bagshieva Zeynep	Specialist of the Balkan Hydrogeological Expedition
45	Komekova Gunchagul	Specialist of the Khazar State Reserve

List of the participants: stakeholder consultations in
Aktau, Kazakhstan 2-3 April 2025

- Akimat of Mangystau oblast (local authorities)
- Mangystau Department of the Ministry of Environment and National Protection
- Mangistau Regional Territorial Inspectorate of Forestry and Wildlife
- Fisheries Department of Mangistau Region
- Mangystau Department of Hygrometeorology
- Center of Caspian Seals Protection
- University named in honor of Essenov
- The Enterprise “Морской порт” (Sea Port)
- Mangystau MynaiGaz (Oil Company)
- NGO “Eco Mangystau”

List of participants in the meeting in Aktau on April 2, 2025

Name of participants	Title of the Institution	Position
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Dzhusupkaliev A.Zh.	Department of Ecology of Mangistau Oblast	Head of the Department of Ecology of Mangistau Oblast
Galymov M.H.	Department of Ecology of Mangistau Oblast	Head of the Division of State Environmental Regulation
Adilbaev E.E.	Department of Ecology of Mangistau Oblast	Head of the State Environmental Control Division
Nadirkbek K. N.	Department of Ecology of Mangistau Oblast	Head of the Laboratory and Analytical Division
Dzhanalieva N. Sh.	Caspian University of Technology and Engineering named after Sh. Yessenov	Senior Lecturer, Department of Ecology and Geology
Akhmetov S.K.	International Water Assessment Centre	Deputy Director, National Expert UNOPS
Алиев Д.	Неправительственное учреждение «Эко Мангистау»	Менеджер по проектам
Bisikenov A. O.	The Party "Baitak"	Acting Chairman of the Party
Shapagatov T.Zh.	Mangistau Regional Territorial Administration of Forestry and Wildlife	Head of Division
Sarsenbaev N.S.	Hydrometeorological center in Mangistau Oblast	Deputy Head
Markina O. V.	Mangistau Nuclear Power Plant	Head of the Division of Environmental Protection
Tuleushov H. M.	Department of Natural Resources and Nature Management of the Mangistau Oblast	Deputy Head of the Division of Natural Resources and Nature Management
Kushakbaeva E.K.	North Caspian Operating Company (NCOC)	Permit Coordinator
Igilmanova N. B.	Aktau International Sea Trade Port	Main Environmental Officer

Photos of the stakeholder consultations in Kazakhstan:



Figure 3 Stakeholder Consultations in Kazakhstan in April 2025