

Closure Report OSPF Complaint 04/2013 L2755

Project Number: 42399-02
Loan Number: 2755

September 2015

CAREC Transport Corridor -1 (Bishkek – Torugart road) Project 3 km 479-539. Complaint 4/2013 - L2755

This Closure Report for Complaint 4/2013 L2755 is based on the data and information available in September 2015 and the responses to the complaint made during 2013, 2014 and 2015; reports disclosed on ABD and MOTC websites up to September 2015.

ABBREVIATIONS

ADB	–	Asian Development Bank
CSC	–	construction supervision consultant
EcolRP		ecological response plan
EIA	–	environmental impact assessment (January 2014)
EMP	–	environmental management plan
ESO	–	Environmental and Safety Officer (Contractor staff)
ERP		emergency response plan (spill response)
NSC		National Environmental Supervision Consultant (in CSC)
NES	–	National Environment Specialist Officer (in IPIG)
GRG	–	grievance redress group
GOKR	–	Government of the Kyrgyz Republic
IES	–	International Environmental Specialist (in IPIG)
ISC		International Environmental Supervision Consultant (ISC)
KJSNR		Karatal-Japyryk State Reserve & administration officials
NGO	–	non – government organization
OSPF	–	Office of the Special Project Facilitator
PIU	–	Project Implementation Unit in IPIG
SPS	–	ADB’s Safeguard Policy Statement (2009)

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I. INTRODUCTION

1. This document is the Closure Report for Complaint 4/2013 for L2755 Project Number 42399-02 (Appendix A). The Complaint was registered by the ADB Office of the Special Project Facilitator (OSPF) 12th July 2013. The Complaint focused on environmental and disclosure considerations for CAREC Transport Corridor -1 (Bishkek – Torugart road) Project 3 km 479-539.
2. In a memorandum to the President on 30th July 2015, OSPF clarified, after verification with the complainants and consultation with the Central and West Asian Department (CWRD) that the Complaint was not eligible for problem solving under the Accountability Mechanism. OSPF noted that CWRD was aware of the concerns of the complainants and was working to address them and was also following recommendations from OSPF.
3. In a letter to the complainants on 30th July the OSPF explained the process of establishing eligibility and also explained the actions that the Project had progressed in order to address the complainants' concerns. The letter recommended the complainants to collaborate closer with the ADB Project Team and also explained the methods available to the complainants to bring any further complaints to the notice of the Project and OSPF; should all complaints not be addressed. The memorandum and letter are appended to this report as Attachment B.
4. In tandem with the OSPF response the Project Officer and Project Team also developed an Action Plan in July 2013 for the Environmental Impact Assessment and Environmental Monitoring Report. The actions have largely been completed and the action plan has been amended as the project has rolled out in 2014 and 2015.
5. The MOTC – IPIG responded to each of the complaints individually in a summary document presented to ADB in 2013 which is presented in Attachment C. The central focus of the Complaint was lack of disclosure of information and lack of consultation with the authority of the Karatal-Japyryk State National Reserve (KJSNR). In addition there were several items concerning the baseline data on ecology and some on particular species. MOTC IPIG responded in detail to the complaints in Attachment C.
6. The responses of MOTC were made in 2013 when the environmental management structure of the Project was in development. Subsequently a number of actions have been taken as a result of the Action Plan that are generally summarized in Attachment C. A key matter was the establishment of the environmental management team for the project. As the environmental management team has been consolidated the environmental management plans have been amended and updated in line with SPS and best international practice. The table of responses (Attachment C) has been updated in this report to reflect further actions taken up to September 2015 to address the complaints.

II. ENVIRONMENTAL MANAGEMENT TEAM

7. The Environmental Management Team consists of several environmentally qualified persons who have worked to implement the environmental management of the project and responded to address the complaint 04/2013 – L2755.
8. The project is constructed under a design-build modality. The international Contractor is responsible for the design and building the road to a Category 3 standard. The Contractor must follow the environmental management requirements of the EIA and environmental management plan (EMP) as approved by Government and as endorsed by ADB. The Contractor has established environmental credentials from previous projects and holds an ISO 14000 accreditation.
9. The Contractor has two national environmental and safety officers (ESO) who monitor the construction work force activities on a daily basis in line with the requirements of the Contract and the EMP. The EMP has been in place since 2013 and has been updated as necessary in line with best international practice and ADB requirements in the two subsequent construction seasons.
10. The Contractor's activities, implementation of environmental mitigation measures, environmental monitoring and compliance with the requirements of the EIA and EMP are monitored by international construction supervision consultant (CSC-TERA). TERA has a national supervision consultant (NSC) on site throughout the construction period who monitors the day to day activities on site. TERA also has an international supervision consultant (ISC) who is onsite intermittently for several months every year. The ISC provides training and capacity building for the Contractor and the NEC, makes reconfirmation of the environmental monitoring, provides oversight for the implementation of the

Environmental Management Plan (as amended) and guides local engineering and construction staff in their environmental obligations. The ISC guides the systematic approach to all environmental monitoring and liaises with the MOTC IPIG safeguards personnel and ADB offices as necessary.

11. Due to the highly sensitive nature of the work area, another senior international environmental consultant (International Environmental Specialist IES) is engaged by the MOTC – IPIG. Together the ISC and IES have more than 50 years of experience in the implementation of environmental management of large scale infrastructure projects. The IES acts as external independent monitor of compliance with the environmental management plan and to monitor data during the construction phase. The IES also provides specialist input for the ecological response plan, designing ecological monitoring as part of the EMP and provides high level advisory role on all other matters concerning environmental management. The IES has provided input in KGZ over seven months to date and has made six visits to the site in 2013 (1) 2014 (3) and 2015 (2) and conducted several liaison and training meetings with KJSNR. The IES has, amongst other tasks, designed the ecological response plan, including ecological monitoring, borrow pit management, spill response plan and emergency response plan and conducted training for MOTC, IPIG, KJSNR and the Contractor.

12. There is a robust environmental team and a detailed system of environmental management and monitoring that is well staffed and well implemented in line with the requirements of the Contract and ADB safeguards. This system has recently been held up to further international scrutiny by ADB as an example of managing safeguard compliance. The Project has shown off the learned experience of environmental performance during project implementation for CAREC 1.3 by including the Project lessons and a visit to the site as the field example in RETA 7548¹.

III. ACTIONS TO RESPOND TO COMPLAINTS

13. Overall, the matters raised in the complaint have been carefully considered and addressed in detail. The complainants' concerns have been recognized and responded to by the Project Team in Central and West Asian Department (CWRD) and MOTC IPIG and the CS TERA. CWRD has followed the recommendations from OSPF and the environmental team have monitored the project closely, in line with the EMP (updated as necessary).

14. The Ecological Response Plan (EcolRP) was prepared in 2014. Several meetings and training sessions have been successfully completed with staff of Karatal-Japyryk State National Reserve (KJSNR) and an Ecological Monitoring Plan (as updated) has addressed the need for training of KJSNR to monitor the natural and critical habitats.

15. The ecological monitoring proposed in the EcolRP in 2014 has generally been completed with a high degree of success. A substantial ecological data set has been gathered in both preconstruction and construction phases. The ecological monitoring was conducted by ecologists in five specialist areas (to monitor vegetation, birds, mammals, insects and hydrobiology). The numbers of species present before the project was implemented has been maintained during the construction phase.

16. In addition to conducting ecological surveys in their respective fields of expertise, each of the five ecological surveyors were required to work alongside one nominated KJSNR staff specialist to build capacity of KJSNR to perform the scope of work. Essentially the brief was to train staff of the staff of KJSNR in order that they would be able to take over the monitoring in 2015 and in future years to bolster the management planning for KJSNR. This training process is ongoing in 2015.

¹ RETA 7548: Improving Implementation of Environmental Safeguards in Central and West Asia Regional: Workshop on Regional Exchange on Good Practice of Environmental Safeguards Management, *Issykkul, Kyrgyzstan, 3-7 Aug 2015*.

Appendix A: Complaint L2755 4/2013

To: Office of Special Project Facilitator
Date: June 21, 2013

We, Zhandyraliev Bolot, Ulan Naamatbekov and Umutbek Ismailov, whose names and addresses are attached, live in Naryn town, the Kyrgyz Republic; present this complaint to the Special Project Facilitator.

We are, or are likely to be, directly affected materially and adversely by the ADB- assisted project Bishkek-Naryn-Torugart (CAREC Transport Corridor 1, 42399-023, project number 3) in the Kyrgyz Republic.

The direct and material harm is, or will be, the result of an act or omission of ADB in the course of the formulation, processing or implementation of this project. The acts or omissions that we believe are the responsibility of ADB include the following:

- The project is classified as category A project, because, the 501-531 km section of the road passes nearby to the Karatal-Japyryk protected area and there are concerns about contamination of nearby territory. Karatal-Japyryk protected area is Ramsar Convention site, and all work carried out in this area shall be discussed, consulted and agreed with the reserve staff (Convention requirement). Based on the agreement with MoTC and ADB, one staff member of the reserve scientific department was supposed to be included by company "TERA" (contracted organization to make baseline survey) in conducting baseline environmental monitoring, but they ignored this suggestion. Non-compliance with the Convention is a violation of both national and international law.
- EIA report dated by November 2010 is without a baseline environmental monitoring results. EIA report states that there is no fish in Chatyr-Kul Lake. But there is a protocol of experts establishing the fact of fish presence in the lake. Unfortunately our arguments were not heard by experts who prepared the EIA, which will affect spawning period of the fish during the construction of the road.
- There is also a document from Mr. A. Ostaschenko, scientific specialist, Biology and Soil Institute of the National Academy of Science, dated by July 5, 2011, which states about nesting place of the bird «serpoklyuv» (included in the Red Book - <http://birds-kg.narod.ru/bekasy/serpokluv.htm> and [http://www.wildlife.kg/Ibidorhyncha% 20struthersi / index.html](http://www.wildlife.kg/Ibidorhyncha%20struthersi/index.html)) along the At-Bashi river, but as a result of the project, this area has been given for the development of quarry rubble. Today, this area is not restored and serpokluv's nesting place is destroyed.
- As a result of communication with Ms. Maureen Grewe in 2011, we came to know that baseline environmental monitoring to be conducted at the project site. The report was prepared in December 2012 (according to the date of the report), but not received by us.
- Environmental baseline monitoring was carried out with the beginning of the formation of the group from July 2011 to August 2012. The results are not available officially. The oral and written request to disclose the report is ignored by the PIU with excuse that it's not ready.
- As a result of baseline monitoring, soil samples were taken around the perimeter of the road from Tuz-Bel to Torugart 31km.
- However, we've got the two reports (not from ADB and not from PIU, but from other sources): a separate report of soil scientist and the second - Baseline Environmental monitoring report dated by December 2012. The report states that there were two methods of soil analysis – determination of mobile forms of heavy metals by the inversion-volt-ammeter method (method MU 31-03/04) and the determination of gross forms of heavy metals with spectrometry (method OMG 6 - 01). Laboratory analysis is done on October 4, 2011. Overall, the result from this analysis was not changed in both reports - the content of heavy metals is same, but MPC were changed. (In the report, soil scientist refers to MPC by Obukhov and Clark, and the second report, the second report doesn't specify MPC source).

- Kyrgyzstan does not have MPC, but uses the USSR MPC and according to the methodological guidelines for assessing a dangerous degree of chemicals contamination in soil (approved by the Deputy Chief Medical Officer of the USSR mr. E.M.SAAKYANTS March 13, 1987 N 4266-87), the found harmful chemicals exceed the MPC not only 2-3 times, and sometimes it exceeds hundreds time.
- Or, Kyrgyzstan also uses Russian MPC. In this case, we still can not receive an answer, which MPCs were used (specify source) to assess negative impact of heavy metals and determination of their safety in the second report. Our request to provide a final version of the report to PIU since February 2013, has remained unanswered.
- We understand that these heavy metals were already present before the ADB project, but since there will be the construction of the road under ADB financing, we would like to see an adequate environmental management plan.
- Environmental Management Plan is also not available to the general public. Public consultation, which took place in March 2013 with the presentation of the report, does not give a complete picture of the situation of the project area (the date is specified in the presentation). Thus, there was no informed consultation.
- There is no openness and transparency in decision-making. Several times we sent out requests to disclose baseline monitoring report and inform about MPC used, but have not received the document. At the moment it is not clear at what stage the report of baseline environmental monitoring results, there is also no information on the EMP, although environmental monitoring group members has said that it exists.
- The presence of heavy metals may adversely affect the health not only of nearby villages, but other users of the project site.
- In 2012, the director of the state reserve has sent the results of soil analysis to State Agency for Environment Protection and Forest (SAEPF), but the State agency has not reacted properly (letter is attached).
- The new request of Karatal-Zhapyrykskogo Reserve to SAEPP in 2013, SAEPP said that there is plans to monitor the project site only in the third quarter of this year (letter is attached), while construction works are started at Tuz-Bel and will be completed by the specified period.

We seek the following outcome and remedies through the help of the Special Project Facilitator:

- As it is written in ADB Environment policy, there is need to strengthen the positive impact of the project through environmental management plan.
- The policy principle #6, to provide EIA and EMP in timely manner. Final draft version of the EIA report is not presented. EIA should be prepared with the direct participation of the scientific department of the reserve. MOTC and TERA do not even show draft of the EIA and EMP. They

do not even discuss and agree a single question with the state reserve. Before construction works of the road started, we would like to make a lot of conservation proposals such as during spawning period of fish in rivers, in the season of migratory birds, establishment of road signs, panels and notices, etc.

- After the road construction completed, the flow of cars will increase, there is need to prepare mitigation plan to reduce negative impact over protected area (noise, vibration, pollution, waste, heavy metals, etc.)
- There is important of continuous coordination with the reserve staff, while doing changes of EIA and EMP.
- MoTC and TERA must cooperate and assist in every possible way to state reserve when it comes to certain decisions related to state reserve.
- In accordance with the policy principle #9, there is need to prevent contamination and to control it, and apply international practices, in accordance with internationally recognized standards.
- Chatyr-Kul is a unique undrained alpine lake in the world, and it can be lost due to negative impacts during construction works. For better implementation of this project, we need to work together to avoid any harm to Chatyr-Kul basin..
- There is need to restore the habitat of serpoklyuv bird along the At-Bashi river.
- According to the Environmental Policy principle #8, please support additional programs to promote and enhance the objectives of state reserve.
- There is need to save the rich gene pool of flora and fauna and a unique mountain-lake ecosystem.
- Restore natural ecosystems of the territories exposed to the economic effects.
- To promote awareness and education of the population on biodiversity, in order to provide the support and participation of local communities in the implementation of state reserve objectives.

We have tried to resolve the issues by referring to the PIU MOTC, SAEPF and ADB, and made a good faith effort to resolve our problems. Our requests remain unanswered.

We present the following facts with supporting documents:

- Report of soil expert
- Baseline environmental monitoring report dated by 2012
- Correspondence with PIU MOTC and representatives of the bank (the correspondence was conducted through M.Eralieva).
- Letters from SAEPF
- Report of mr. B. Zhandyraliev
- Documentation of the nesting place pf serpoklyuv bird by Specialist of Kyrgyz National Academy of Sciences
- The act of commission on fish in Chatyr-Kul lake.

We allow publicly release information in the complaint and did not request that our identities were kept confidential.

Signatures:



Bolot Zhandyraliev
Ulan Naamatbekov
Umutbek Ismailov

Bolot Zhandyraliev, Naryn town, 101-B str. Lenin, apt. 3, tel. 0772142119, m.eralieva@gmail.com (we request to keep correspondence via this email)

Ulan Naamatbekov, Naryn, 11-B str. Togolok-Moldo, tel. 0771140208, narynulan@rambler.ru

Umutbek Ismailov Naryn town, 97-B 26 str. Lenin, apt. 3, tel. 0778716888,

Appendix B: Responses of OSPF to Complaint L2755 4/2013 in July 2013



Asian Development Bank

Director, CWTC
Head, CWRD-PSS

Memorandum *please work jointly to address the complainants promptly*
Office of the Special Project Facilitator

30 July 2013 *King Wang 31/07*

To: President

From: Preben Nielsen
Special Project Facilitator *Preben Nielsen*

cc: DG, CWRD (o/r)

Subject: **Complaint on Loan 2755 KGZ: CAREC Corridor 1 (Bishkek-Torugart Road) Project 3 —Eligibility of Complaint**

1. The Office of the Special Project Facilitator (OSPF) received a complaint from people affected by this project. The complaint is related to environment and information sharing.
2. After discussing the complaint with the Central and West Asia Department (CWRD) and also after verifying the complaint with the complainants themselves, OSPF has concluded that the complaint is not eligible for the problem solving function of the Accountability Mechanism at this time.
3. CWRD is aware of the complainants concerns and are working to address them with recommendations from OSPF. We, therefore, do not think OSPF's involvement would be useful at this stage. The complainants, however, are being informed that they are free to bring their complaint back to OSPF should they find the collaboration with the project parties unsatisfactory.

cc: Chief Advisor to the President, OPR
Vice President X. Zhao
Director General, CWRD (with attachment)
CWTC Director (with attachment)
Complaint Receiving Officer

ASIAN DEVELOPMENT BANK
RECEIVED
31 JUL 2013
[Signature]
Director General
Central and West Asia Department



Asian Development Bank
Office of the Special Project Facilitator

30 July 2013

Mr. Zhandyraliev Bolot
Mr. Ulan Naamatbekov
Mr. Umutbek Ismailov

Subject: **Complaint on Loan 2755 CAREC Corridor 1 (Bishkek-Torugart Road) Project 3—**
Eligibility of Complaint

Greetings:

We refer to your letter dated 21 June 2013 and your confirmation received on 2 July submitting a complaint to OSPF, and which we acknowledged on 12 July 2013.

In order to determine eligibility of this complaint, OSPF has undertaken an initial assessment to gather information regarding your complaint. We would like to inform you of our findings as follows:

- The ADB Project Team has been taking your comments on the potential impacts of the project very seriously. They have expressed the validity of your comments and suggestions, and have taken them into account. These comments are particularly in relation to heavy metals in the soil, the nesting place of the Serpokluy bird, the fish and the timely disclosure of the Environment Impact Assessment (EIA) and Environment Management Plan (EMP).
- From June 2012 to June 2013, the project has undertaken several additional surveys to ensure the quality and accuracy of the baseline information. The baseline environmental monitoring results are now made available and included in the updated draft EIA, which was disclosed on ADB and IPIG MOTC websites on 22 July 2013, in accordance with ADB's Public Communication Policy (PCP). A public consultation to discuss this updated draft EIA was held in the Oblast administration office of Naryn city on 26 July 2013, to which you were invited.
- The draft EIA, including EMP, was first updated on 7 June 2012 by an ADB staff consultant based on the first additional baseline monitoring data but was not acceptable to ADB for disclosure due to lacking of sufficient baseline monitoring data. At that time, ADB requested two more sets of additional baseline data to be collected for seasonal variations. Based on the new baseline monitoring results, an updated draft EIA was submitted to ADB on 22 April 2013, followed by a public consultation on 30 April 2013 to discuss the findings presented in this draft. Several revised versions were later submitted on 30 June, 17 July and 19 July 2013 to address ADB's further comments. All these draft EIA versions were considered as work-in-progress documents, and therefore were not disclosed in ADB and IPIG MOTC websites.

- We now urge the complainants to read the disclosed updated draft EIA and make written comments and suggestions, if any. In addition, all future public consultations' locations and dates will be posted on IPIG MOTC website in advance for public information.
- The project has assured us that there are conservation activities planned to further mitigate negative impacts. These plans are outlined in the EMP. The general public, NGOs and relevant local administrations can participate in the activities. We therefore urge you to take careful note of these upcoming programs and participate actively to ensure that your concerns are noted.
- With regard to your communications with the project team, including those of MOTC and the PIU, OSPF agrees that this can be improved. The project has established a grievance redress mechanism which we believe you have tried to contact. However, we have no written record of these communications. We strongly believe that the project grievance redress mechanism is the first place for concerns to be resolved and encourage you to continue to use this mechanism. OSPF will strongly recommend that this mechanism is strengthened as it may not be functioning to its full potential.

To strengthen communications between yourselves and the project, we wish to recommend the following:

- All future correspondence with ADB pertaining to this case should go through the project team leader, Ms. Susan Lim, Transport Specialist (slim@adb.org Tel: +63 632-5530) and alternate focal Mr. Mirdin Eshenaliev, Senior Project Officer, KYRM (meshenaliev@adb.org; Tel +996 312 6241956). Anyone can make a request to the project team leader to meet and discuss related issues when she is on mission in KGZ, or via teleconference or videoconference when she is in HQ, Manila.
- With regard to communications with the MOTC and the IPIG, all correspondence and telephone contact related to this case should be addressed to Mr. Kubanychbek Mamaev, Director, Investment Projects Implementation Group (IPIG) (+996 312 900 970, bishkekoshroad@infotel.kg).
- As for the project GRM, we recommend that the complainants send their concerns in writing addressed to the local contact point who is Mr. Oserovlbragim, Resident Deputy Engineer, TERA (+996 772 559 503 and +996 555 559 503, ibragim1959@rambler.ru) and alternate focal Mr. Mirlan Beksultanov, Assistant to Mr. Oserovlbragim (+996 778 714 474, mirlan_beksultanov@mail.ru). The Central Focal Point from IPIG is Ms. Svetlana Keldibaeva, Safeguard Specialist, IPIG (+996 555 714789, skeldibaeva@piumotc.kg). OSPF will offer support to the grievance redress mechanism on a country wide level if accepted by the government and the project. Our plan is to strengthen the GRM of all ADB projects.

Based on our preliminary investigation, OSPF strongly believes that you should collaborate more closely with the ADB project team to ensure successful implementation of this project. We have instructed the project team, MOTC and PIU to further extend their collaboration as well, and we are confident that future communications and sharing of ideas, concerns and advise will be respected and responded to more efficiently. The ADB operations department (CWRD) will monitor these arrangements to ensure better collaboration and communication, with the guidance of OSPF. You are also welcome to keep us informed of your collaboration.

With this, OSPF finds your complaint ineligible at this time. However, if after a period of time, you find the collaboration with the project team, MOTC or PIU unsatisfactory you are free to bring your complaint back to OSPF.

Yours sincerely,



Preben Nielsen
Special Project Facilitator

Appendix C: Master List of Responses to Complaint L2755 4/2013

№	Complainant L2755 4/2013	MOTC response
During implementation of the project, ADB's any actions or inactions - are or will result of direct or material damages, which include following:		
1	<p>The project is classified as category A project, because, the 501 -531 km section of the road passes nearby to the Karatal-Japyryk protected area and there are concerns about contamination of nearby territory. Karatal-Japyryk protected area is Ramsar Convention site, and all work carried out in this area shall be discussed, consulted and agreed with the reserve staff (Convention requirement). Based on the agreement with MoTC and ADB, one staff member of the reserve scientific department was supposed to be included by company "TERA" (contracted organization to make baseline survey) in conducting baseline environmental monitoring, but they ignored this suggestion. Non-compliance with the Convention is a violation of both national and international law.</p>	<p>In the scope of pre-design stage in 2011, TERA has employed scientists group for preparation of monitoring baseline and Environmental Management Plan, Mr. Jandyraliev B. was in this group as Karatal Djaparyk [KJSNR] special protected zone representative. However Mr. Jandyraliev B. failed in his duties having provided the report not corresponding to its specification. IPIG has Technical Specifications and two reports from Mr. Jandyraliev B. As well as minutes of meeting, where he did not understand the task and therefore requested to relieve him from his position.</p> <p style="text-align: center;"><i>[KJSNR have been consulted on numerous occasions during the implementation of the project].</i></p>
2	<p>EIA report dated by November 2010 is without a baseline environmental monitoring results. EIA report states that there is no fish in Chatyr-Kul Lake. But there is a protocol of experts establishing the fact of fish presence in the lake. Unfortunately our arguments were not heard by experts who prepared the EIA, which will affect spawning period of the fish during the construction of the road.</p>	<p>Two researches of Chatyr Kul lake zooplankton found that in the lake there are 34 types of the following groups: rotifers, copepods and Cladocera or cladocerans. Data collection on phytoplankton was carried out in total at 21 points. Besides, on one of this points it was caught some species of fish. In this lake fish is absent, because this lake ecosystem is not vital for the typical sorts of fish, in particular, for Scaleless Osman, because of the chemical composition of lake water and poor oxygen saturation. However, during the warm season in the lake can meet some rare specimens, become from mountain rivers flowing into the lake. Quantitative characteristics of aquatic organisms, especially aquatic bottom, allow us to classify the lake as a water basin with a high trophic level.</p> <p style="text-align: center;"><i>[The EIA (including Ecological Baseline Monitoring) was updated and approved by the authority and disclosed on the ADB website].</i></p>
3	<p>There is also a document from Mr. A. Ostaschenko, scientific specialist, Biology and Soil Institute of the National Academy of Science, dated by July 5, 2011, which states about nesting place of the bird <serpoklyuv> (included in the Red Book - http://birds-kg.narodiru/bekasy/serpoklo http://www.wildlife.kg/lbidorhvncha%20struthersi/index.html).</p> <p>along the At-Bashi river, but as a result of the project, this area has been given for the development of quarry rubble. Today, this area is not restored and serpoklyuv's nesting place is destroyed.</p>	<p>At Bashy village, Naryn oblast, St Bashy region, is located on km. 94 at the beginning of project area (project area BNT-3 km. 479-539). At Bashy river flows in At-Bashi valley, At-Bashi valley closes with Ak-Beyit Pass in Southwest. The At Bashy river crosses the road, rehabilitated in the scope of BNT-1 project. Currently, the major works at the site are completed, the contractor will carry out works on recultivation of pits to the end of 2013.</p> <p style="text-align: center;"><i>[The internet links do not provide a connection to any page on the world wide web.</i></p> <p style="text-align: center;"><i>Serpoklyuv bird is also known as Ibisbill - <u>Ibidorhyncha struthersi</u> The recultivation of the quarry site and the clean-up of the area post production of materials is progressing. Certain heavy plant remains on-site but is not a source of contamination or environmental disturbance any longer. The plant has been prepared for transportation off-site. The delay is because the plant is scheduled for re-use by the contractor on another project for MOTC and the site is not yet available. The breeding habitat for the river bed is no longer disturbed and two seasons of flood water have reinstated the rocky substrate of the river bed.</i></p> <p style="text-align: center;"><i>Additional bird surveys have been carried out in the post-operational phase and bird populations are as diverse as before the construction].</i></p>

№	Complainant L2755 4/2013	MOTC response
4	<p>As a result of communication with Ms. Maureen Grewe in 2011, we came to know that baseline environmental monitoring to be conducted at the project site. The report was prepared in December 2012 (according to the date of the report), but not received by us.</p>	<p>17 January 2013 MOTC send Eco-Baseline Monitoring Report for examination and obtaining the conclusion (review) in Forestry and Environmental Protection State Agency under the KR Government (MOTC letter №14-3/257 from 17.01.13).</p> <p>28 January 2013. MOTC received the letter from Forestry and Environmental Protection State Agency (№08-01-28/233 from 28.01.13 г.) with conclusion according to the Eco-Baseline Monitoring Report. Excerpt from the letter:</p> <p>- Throughout the text of the submitted letter, the Agency has no fundamental remarks and offers. Together with it the Agency notes the need to provide, for coordination with our agency, the final version of the draft EIA to develop environmental management plan.</p> <p>MOTC KR as State Regulatory Agency has fulfilled its obligations on necessary to provide information and coordination (Отче Eco-Baseline Monitoring Report) to the Forestry and Environmental Protection State Agency under the KR Government. Currently the Eco-Baseline Monitoring Report will be updated, as results of soil analyses on the content of heavy metals are expected.</p>
5	<p>Environmental baseline monitoring was carried out with the beginning of the formation of the Group from July 2011 to August 2012. The results are not available officially. The oral and written request to disclose the report is ignored by the PIU with excuse that it is not ready.</p>	<p>The updating works of Eco-Baseline Monitoring Report are not finished yet, the results of soil analyses on the content of heavy metals are expected. Officially MOTC had received only one letter from Forestry and Environmental Protection State Agency, Department of Issyk Kul, Naryn Environmental Protection (№97 from 08.05.13.) with a request for clarification of heavy metals maximum permissible concentration. 22 May 2013 MOTC provides letter (MOTC letter №14-3/3044) to Department of Issyk Kul, Naryn Environmental Protection with clarifications that Eco-Baseline Monitoring Report will be provided after it will update data on heavy metals.</p> <p>[Ecological Baseline Monitoring was completed in 2013 and further Ecological Monitoring was conducted (vegetation, birds, mammals, insects, hydrobiology) in 2014 with bird surveys repeated in 2015. Additional bird surveys have also been conducted for BNT-123 outside the KJSNR in 2014. Environmental parameters for air, noise, vibration and water quality have been conducted (monthly in construction season) in 2014 and 2015. No significant exceedances above background have been recorded. Environmental monitoring reports are available. Ecological monitoring has been presented to KJSNR (Sept 2014) and the data for 2014 and 2015 are in press and will be presented after the final bird monitoring for 2015. KJSNR were invited to participate in the monitoring in 2014 and are included in the bird monitoring for 2015 as a training exercise.]</p>
6	<p>As a result of baseline monitoring, soil samples were taken around the perimeter of the road from Tuz-Bel to Torugart 31 km.</p>	<p>During research and evaluation of soil content and pollution of soil cover with heavy metals, it was taken into account wind direction and speed along the road (at road transport influence zone) and selected 34 soil samples on 9 points. For studying natural fertility it was mortgaged 6 points, and for heavy metals 40 points from which soil samples were taken. The selection of soil samples for soil types were provided by using tape method from the genetic horizons, and on heavy metals – along the road, each 5 km.</p>

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7	<p>However, we've got the two reports (not from ADB and not from PIU, but from other sources): a separate report of soil scientist and the second- Baseline Environmental monitoring report dated by December 2012. The reports states that there were two methods of soil analysis – determination of mobile forms of heavy metals by the inversion-volt-ammeter method(method MU 31-03/04) and the determination of gross forms of heavy metals with spectrometry (method OMG 6 - 01). Laboratory analysis is done on October 4, 2011. Overall ,the result from this analysis was not changed in both reports - the content of heavy metals is same, but MPC were changed. (In the report soil scientist refers to MPC by Obukhov and Clark, and the second report, the second report doesn't specify MPC source.</p>	<p>An important factor influencing the behavior of heavy metals in soil is pH (soil environment) and carbonate (CO₂), so at alkaline reaction it is appear soluble forms of heavy metals. At increase of acidity there is the backward process - soluble form go to a more mobile (Alekseev Yu. In 1987). Therefore, the Obuhov and Klark method which determine Maximum Permissible Concentration (the first inception report), where limits of maximum permissible concentration are suitable for non-calcareous soils with acidic soil solution. As it is already studied, the soils of the project zone are carbonate, and reaction of the soil environment is alkaline. Therefore to definition of maximum permissible concentration of total forms of heavy metals at project region it was used Ilyin V.A. technique. Scientists of Czechoslovakia (Chuldzhiyan H. 1988) prepared Maximum Permissible Concentration of heavy metals mobile forms (ekstrogen 1,0 n HCL) to ensure hygiene standards of received productions (vegetable): mercury (Hg)-; cadmium - 1,0; cobalt - 12,0; chrome - 15,0; arsenic - 15,0; nickel - 36,0; copper - 50,0; lead - 60,0; zinc - 60,0; tungsten - 80,0; manganese - 600 mg on 1 kg of the soil.</p> <p><i>[Further analysis of the data presented in several analyses taken up to the end of 2013 were reviewed by the IES in 2013. The concentrations found in all soils indicate "No Ecological Concern". The data collected on soils and water for the EIA do not indicate any "soil contamination". Any suggestion that soil in the vicinity of borrow pits would not be in alignment with the data.</i></p> <p><i>The water quality test results are contained in Annex 11 of the EIA. No heavy metals (e.g. Pb, Cd, Zn or As) were detected in any of the water samples.</i></p> <p><i>The sampling points in the Chatyr-Kul lake indicate high sulphates and chlorides, which is typical of high altitude lakes. This is a natural phenomenon. The water sampling at the Lesser Lake (Kosh Kul) and "Narzan" Spring are within MPC. The natural processes do not show any signs of contamination.</i></p> <p><i>The soil test results in the EIA are summarized in the attached table A3 T1. The MPC levels are stricter than the internationally accepted EHS levels for most parameters.</i></p> <p><i>No heavy metals were above the MPC or EHS levels. Based on this interpretation of the data the soil concentrations of all metals tested were below the MPC and EHS limits, except for strontium. Strontium is a common component of soil and the EIA itself states that this in no cause for concern. Based on the EHS levels the conclusion is "No Ecological Concern"]</i></p>
8	<p>Kyrgyzstan does not have MPC, but uses the USSR MPC and according to the methodological guidelines for assessing a dangerous degree of chemicals contamination in soil(approved by the deputy Chief Medical Officer of the USSR mr. E.M.SAAKYANTS March 13, 1987 N 4266-87), the found harmful chemicals exceed the MPC not only 2-3 times, and sometimes it exceeds hundreds time.</p>	<p>As it is shown above, this methodical instruction isn't suitable for Kyrgyzstan soils, because here, the soils are carbonate and has alkaline reaction of soil solution. In carbonate soils with sour reaction of soil solution some heavy elements are in a mobile condition and their small amount negatively influences to environment (There are absent soils with sour reaction of soil solution in Kyrgyzstan).</p> <p><i>[See above No heavy metals were above the MPC or EHS levels and the conclusion is "No Ecological Concern"]</i></p>
9	<p>Or, Kyrgyzstan also uses Russian MPC. In this case, we still cannot receive an answer' which MPCs were used (specify source) to assess negative impact of heavy metals and determination of their safety in the second report. Our request to provide a final version of the report to PIU since February 2013, has remained unanswered.</p>	<ol style="list-style-type: none"> 1. At researched are it is used method of Ilyin V.A. - maximum permissible Concentrate of gross forms of heavy metals. 2. maximum permissible Concentrate of a mobile form of heavy metals according to Chuldzhiyan H. <p><i>[The EIA has been amended reissued and approved by the authority and disclosed on the ADB website].</i></p>
10	<p>We understand that these heavy metals were already present before the ADB project, but since there will be the construction of the road under ADB financing, we would like to see an adequate Environmental Management Plan.</p>	<p>At the project Special Protected Zone, Chatyr kul lake area and the surrounding area, it is necessary to create an environmental checkpoint for the control of vehicle emissions, fuel spills and other hazardous materials, as well as introduce the developed system of the monitoring which major task is control of local pollution of soils by heavy metals at transport influence zone.</p> <p><i>[See above No heavy metals were above the MPC or EHS levels and the conclusion is "No Ecological Concern"]</i></p>

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11	Environmental Management Plan is also not available to the general public. Public consultation, which took place in March 2013 with the presentation of the report, does not give a complete picture of the situation of the project area (the date is specified in the presentation) Thus' there was no informed consultation.	<p>Currently, it is carried out updating works of the Eco-Baseline Monitoring Report, because results of soil analyses on the content of heavy metals are expected. EIA is finished in July, 2013 and directed to ADB for approval. After receiving approval from ADB, the EIA will be directed to Forestry and Environmental Protection State Agency under the KR Government for examination and, to Contractor for development of detailed EMP. The Final EIA will be officially submitted to Forestry and Environmental Protection State Agency under the KR Government, uploaded on web-site of ADB and IPIG MOTC KR.</p> <p><i>[The EIA (including consultation) has been amended reissued and approved by the authority and disclosed on the ADB website. The earlier versions were disclosed in August 2013 and subsequently updated].</i></p>
12	There is no openness and transparency in decision-making. Several times we sent out requests to disclose baseline monitoring report and inform about MPC used, but have not received the Document. At the moment it is not clear at what stage the report of baseline environmental monitoring results, there is also no information on the EMP, although environmental monitoring Group members has said that it exists.	<p>IPIG MOTC KR can't provide documents while they are in completions period since information is updated and specified. IPIG received only one letter: From: Maya Eralieva mailto:m.eralieva@gmail.com Sent: Wednesday, June 19, 2013 1:45 PM To: IPIG MOTC KG Subject: Re: Maximum permissible concentration of heavy metals. Dear S. Ibraimov, I knew that at the beginning of June, Project ecologist and coordinator came from ADB headquarters. They asked me to contact you on the latest news of the project. According to our recent correspondence, could you clarify whether the report consultation was already tale lace? could you send me the final Eco-Baseline Monitoring Report? Or clarification on an earlier question? On 20.06.13. the report was sanded with following information: Public hearings on Eco-Baseline Monitoring Report for the BNT-3 Project were provided on 30.04.13 in Naryn town. Currently the report is on a stage of finalizing and updating, therefore, at this time the report can't be provided. As soon as it will be finalized and updated it will be uploaded on web-site of ADB and IPIG MOTC KR.</p> <p><i>[The EIA (including Ecological Baseline Monitoring) has been amended reissued and approved by the authority and disclosed on the ADB website. The earlier versions were disclosed in August 2013 and subsequently updated].</i></p>
13	The presence of heavy metals may adversely affect the health not only of nearby villages, but other users of the Projects site.	<p>Within the BNT-3 project it was provided researches by scientists group (Eco-Baseline Monitoring Report), and if not this researches, nobody will knew about this heavy metals at project zone.</p> <p>The content of total and mobile forms of heavy metals are lower then Maximum permissible concentration, for a more complete picture and explain the situation, IPIG were initiated conduct additional analyzes on the contents of heavy metals. The the results will be enclosed to Eco-Baseline Monitoring Report.</p> <p><i>[No heavy metals were above the MPC or EHS levels and the conclusion is "No Ecological Concern"]</i></p>
14	In 2012,the director of the state reserve has sent the results of soil analysis to State Agency for Environment Protection and Forest (SAEPF), but the State agency has not reacted properly (letter is attached).	<p>MOTC KR doesn't control the correspondence of Special Protected Zone with Forestry and Environmental Protection State Agency under the KR Government, because Karatal-Djaparyk Special Protected Zone, as well as Issyk kul, Naryn Department of Territorial Environmental Protection are the part of Forestry and Environmental Protection State Agency under the KR Government.</p> <p><i>[No heavy metals were above the MPC or EHS levels and the conclusion is "No Ecological Concern"]</i></p>
15	The new request of Karata I-Zhaparykskogo Reserve to SAEPF in 2013,SAEPF said that there is plans to monitor the project site only in the third quarter of this year(letter is attached), while construction works are started at Tuz-Bel and will be completed by the specified period.	<p>MOTC KR has no right to interfere in the work of the Special Protected Zone and Forestry and Environmental Protection State Agency under the KR Government, because Karatal-Djaparyk Special Protected Zone, as well as Issyk kul, Naryn Department of Territorial Environmental Protection are the part of Forestry and Environmental Protection State Agency under the KR Government.</p> <p><i>[EMP implementation is in three phases, (i) before construction; (ii) during construction; and (iii) during operation and maintenance of the road. The EMP has been implemented since the works commenced and throughout 2013].</i></p>

We seek the following outcome and remedies through the help of the Special Project Facilitator:

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1	As it is written in ADB Environment policy, there is need to strengthen the positive impact of the project through environmental management plan.	<p>In the frames of BNT-3 implemented project the works on Environmental Impact Assessment were started in 2009. By results of conducted works the public consultations were conducted:</p> <ul style="list-style-type: none"> - the first public consultations on EIA were conducted on September 18, 2009 in Naryn city by JOC Consulting Company; - the second public consultations on EIA were conducted on December 11, 2009 in Naryn city by JOC Consulting; - the third public consultations on EIA were conducted on September 24, 2010 in Naryn city by JOC Consulting; - the fourth public consultations on EIA were conducted on April 30, 2013 in Naryn city by TERA Consulting Company. <p><i>[EMP is implemented since the works commenced in 2013].</i></p>
2	The policy principle #6, to provide EIA and EMP in timely manner. Final draft version of the EIA report is not presented. EIA should be prepared with the direct participation of the scientific department of the reserve. MOTC and TERA do not even show draft of the EIA and EMP. They do not even discuss and agree a single question with the state reserve. Before construction works of the road started, we would like to make a lot of conservation proposals such as during spawning period of fish in river, in the season of migratory birds, establishment of road signs, panels and notices, etc.	<p>At present time, specialists of TERA company together with IPIG, MoTC KR are carried out finalizing of EIA. At the end of June, 2013, final version of EIA will be send to ADB approval. After receiving of approval from ADB, EIA will be send to the government expertise to SAEPF under Government of KR. IPIG, MoTC KR is open for suggestions of citizens on environment protection (environmental suggestions) at project site, but we have no official request. The process of coordination and approval with Karatal-Japaryk Reserve is conducted by officially way through correspondence in the case of any questions.</p> <p><i>[The EIA (including EMP, Ecological Baseline Monitoring) has been disclosed on the ADB website since August 2013. KJSNR have subsequently been consulted throughout 2014 and 2015. Roadsigns have been included as part of the Ecological Response Plan].</i></p>
3	After the road construction completed, the flow of cars will increase ,there is need to prepare mitigation plan to reduce negative impact over protected area (noise, vibration, pollution, waste, Heavy metals, etc.)	<p>In frame of BNT implementing project BNT3, main purpose of conducted researches (Baseline Environmental monitoring report) is development and introduction environmental monitoring system at mentioned project site on base of basic environmental indicators. Monitoring of environmental indicators will let to follow the dynamic of separate segments evolution and nature environment at whole; and identify factors, which have influence to environmental condition during construction period and period of further using of road.</p> <p>From the practical point of view, these steps are necessary for introduction of environmental monitoring system before starting construction works at this BNT road section and timely react to negative tendencies in nature. In this case, after completion of construction works this monitoring system will be transferred to Karatal-Japaryk Reserve's Direction for further maintenance and service. The staff of Karatal-Japaryk reserve will be educated to the work with monitoring system and exploitation of equipment and instruments, which will be specially purchased in frame of this project.</p> <p><i>The EIA (including EMP) covers operational monitoring].</i></p>
4	There is important of continuous coordination with the reserve staff, while doing changes of EIA and EMP.	<p>IPIG under MoTC closely cooperates and discusses issues with SAEPF under the Government of the KR, with Karatal-Japaryk reserve (we know it perfectly).</p> <p><i>[KJSNR have been consulted on numerous occasions during the implementation of the project].</i></p>
5	MoTC and TERA must cooperate and assist in every possible way to state reserve when it comes to certain decisions related to state reserve.	<p>Cooperation with Karatal-Japaryk reserve is a result of circumspect policy of MoTC and SAEPF under Government of the KR. In frame of BNT-3 implementing project, the capacity building of Karatal-Japaryk reserve is planning:</p> <ul style="list-style-type: none"> - conduction of Baseline environmental condition studies; - development and introduction of environmental monitoring system; - equipment purchase (laboratory and office equipment); - Karatal-Japaryk reserve's staff training; - purchase automobile for staff of Chatyr-Kul area of karatal-Japaryk reserve. <p><i>[KJSNR have been consulted on numerous occasions during the implementation of the project].</i></p>
6	In accordance with the policy principle #9, there is need to prevent contamination and to control it, and apply international practices, in accordance with internationally recognized standards.	<p>This principle is performed under project implementation.</p> <p><i>[The Ecological Response Plan has two phase strategy one of which is pollution control. This is being imlemented].</i></p>

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7	Chatyr-Kul is a unique undrained alpine lake in the world, and it can be lost due to negative impacts during construction works. For better implementation of this project we need to work together to avoid any harm to Chafyt-Kul basin.	<p>The number of alternative variants was considered, including variant of “refuse from activity”, alternative roads and alternative type of transportation, considered below. If judge by only economic and financial factors, there are no acceptable alternatives for proposed project. Alternative "doing nothing" is not attractive because of environmental and economic factors. The decision of alternative modes of transport is not viable in view of the objectives of economic and social development. Given the economic, environmental, financial and social factors, preference is given to the proposed Project.</p> <p>Doing nothing. Variant “doing nothing” is not recommended on the basis of environmental and economic considerations. Despite the fact, that in this case will be no direct costs, disadvantages of “doing nothing” variant are following:</p> <ul style="list-style-type: none"> - Economic factors including: increasing of transportation time from China and increasing of transport costs as far as further deterioration existing road conditions. - ecosystem of protected area of Chatyr-Kul lake will be under threat of increased risk of traffic accidents. - Water of Chatyr-Kul lake might be polluted because of filling of fuel and other harmful substances, what will lead to damage for fragile flora and fauna. <p>[The effective implementation of the EMP has ensured that there is no pollution of the environs of Chatyr-kul basin. This has been monitored frequently throughout the construction period].</p>
8	There is need to restore the habitat of serpoklyuv bird along the At-Bashi river.	<p>In frame of BNT-1 projects was planning barrow excavation on km. 400+60 (100 m. Left, bridge through at-Bashy river). All necessary authorization documents from local authorities, Issyk-Kul, Naryn territorial authorities of environment protection are included to the structure of SAEPF under Government of the KR. Works on barrow excavation were started, but during this was identified, that volume of inert matters reserves is small. Barrow was reclaimed.</p> <p>[The breeding habitat for the river bed is no longer disturbed and two seasons of flood water have reinstated the rocky substrate of the river bed.</p> <p>Additional bird surveys have been carried out in the post-operational phase and bird populations are as diverse as before the construction]</p>
9	According to the Environmental Policy principle #8, please support additional programs to promote and enhance the objectives of state reserve.	<p>MoTC support position of applicant.</p> <p>[KJSNR have been consulted on numerous occasions during the implementation of the project and proposals include</p> <ul style="list-style-type: none"> - conducting baseline environmental studies; - development and introduction of environmental monitoring system; - equipment purchase (laboratory and office equipment); - Karatal-Japaryk reserve’s staff training; - purchase automobile for staff of Chatyr-Kul area of KJSNR. <p>KJSNR have participated where applicable].</p>
10	There is need to save the rich gene pool of flora and fauna and a unique mountain-lake ecosystem.	<p>These are emotions, scientific view is described in detail in the Baseline Environmental Monitoring Report in the EIA.</p> <p>[Further studies have been carried out in 2014 and 2015 to support the management of the gene pool]</p>

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11	Restore natural ecosystem so of the territories exposed to the economic effects.	<p>Chaytr-Kul lake and Son-Kul are part and are the responsibility of Karatal-Japaryk state reserve with staff of 30 persons. Its office is located in Naryn city. Office include 2 divisions: (i) division of scientific researches and (ii) division of protection and control.</p> <p>Tasks of division of protection and control include protection of Chatyr-Kul ecosystem from illegal hunting. Three teams consisted from 3-4 persons, each carried out patrolling around the lake from April to October, using tent as shelter. They main task is don't let enter of persons, which have no permit to protected area of Chatyr-Kul lake. Reservation of natural ecosystem in Chatyr-Kul lake basin is responsibility of Karatal-Japaryk reserve.</p> <p><i>[Further studies on vegetation have indicated that the single most important impact on the reserve is the overgrazing of the sparse grasses in the summer months. Control of this impact or removal of cattle grazing altogether is likely to be a key issue to restoring the natural ecosystem]</i></p>
12	To promote awareness and education of the population on biodiversity, in order to provide the support and participation of local communities in the implementation of state reserve objectives.	<p>According to regulation of ADB policy about on disclosure of information to public in the preparation of the EIA was conducted public hearings and meetings with interested sides:</p> <ul style="list-style-type: none"> - the first public consultations on EIA were conducted on September 18, 2009 in Naryn city by JOC Consulting Company; - the second public consultations on EIA were conducted on December 11, 2009 in Naryn city by JOC Consulting Company; - also the meetings with SAEPF were conducted on September 15, 2009 and October 13, 2009 (with representatives of Department of environmental impact assessment; Department of biodiversity support of specially protected nature areas, ecological education and press service); - On September 17, 2009 and October 14- 15, 2009 r. The meeting with representatives of Karatal-Japaryk state reserve and State oblast administration of Naryn; - On 18 September 2009, the meeting with scientific-research department of Karatal-Japaryk state reserve; - On 13 October, 2009, 5 November, 2009 the meeting with representatives of National Academy of Sciences of the KR, Institute of Biology. - On 13 October, 2009, the meeting with representatives of Department of water resources of the KR - On 15 October, 2009, the meeting of representatives of Customs service; - the third public consultations on EIA were conducted on September 24, 2010 in Bishkek city by JOC Consulting Company; - the fourth public consultations on EIA were conducted on April 30, 2013 in Naryn city by TERA Consulting Company. <p><i>[The public have been made aware of the importance of the reserve through the Project implementation. KJSNR can follow up on this start].</i></p>
13	We have tried to resolve the issues by referring to the PIU MOTC, SAEPF and ADB, and made a good faith effort to resolve our problems. Our requests remain unanswered.	<p>Efforts on the part of the applicant during work as a team of experts, attracted by TERA consulting company were not bona fide.</p> <p><i>[KJSNR have been consulted on numerous occasions during the implementation of the project].</i></p>
14	Bolot Zhandyraliev Naryn town, 101-B str. Lenin, apt.3, tel.0712142119 m.eralieva@gmail.co (we request to keep correspondence via this email)	<p>This letter was received from Mr. Bolot Jandyraliev living in Naryn city, Lenin street, number 101 b, ap.3, but email address is of Ms. M.Eralieva.</p> <p><i>[KJSNR have been consulted during the implementation of the project].</i></p>
		Responses to comments by MOTC IPIG.
		<i>[Responses in bold italics are summary of events by IES September 2015]</i>