## **Quarterly Environmental Monitoring Report**

Project Number: IRRIP/OCB/CW/01 Loan Number: ADB Loan 4485-KGZ

Grant Number: 0965-KGZ

Quarterly Environmental Monitoring Report July to September 2025

Kyrgyz Republic:

# Issyk-Kul Ring Road Improvement Project (Barskoon-Karakol section, 75.2 km)

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Prepared for:

Ministry of Transport and Communications of the Kyrgyz Republic

Approved by: [Name and signature of Executive Agency staff]

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## **Abbreviations**

ADB - Asian Development Bank

ACP - Asphalt Concrete Plant

CAREC - Central Asia Regional Economic Cooperation

CSC - Construction Supervision Consultant

EMP - Environmental Management Plan

SSEMP - Site Specific Environmental Management Plan

PIU - Projects Implementation Unit

m - Meter

km - Kilometer

KR - Kyrgyz Republic

MPC - Maximum permissible concentration

MAC - Maximum Allowable Concentration

MoTC KR - Ministry of Transport and Communication of KR

MF KR - Ministry of Finance of the Kyrgyz Republic

MoCT KR - Ministry of Culture and Tourism of the Kyrgyz Republic

MNRETS KR - Ministry of Natural Resources, Environment and Technical Supervision of the Kyrgyz

Republic

DPSSESD - Disease Prevention and State Sanitary and Epidemiological Surveillance Department

of the Ministry of Health of the Kyrgyz Republic

TR - Terms of Reference

SR - Safety Rules

FS - Feasibility Study

CBP Concrete Batching Plant

CSP - Crushing and Screening Plant
RME - Road Maintenance Enterprise

HCHS - Historical and Cultural Heritage Site;

EIA - Environmental Impact Assessment

LP - Labor Protection

HS - Health Safety

OHS - Occupational Health and Safety

LLC - Limited Liability Company

HCHSPP - Historical and Cultural Heritage Site Protection Project

PPE - Personal Protective Equipment

SCIESU under - State Committee for Industry, Energy, and Subsoil Use under the Government of the

GKR Kyrgyz Republic

RCP Reinforced concrete products manufacturing facility

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#### 1. INTRODUCTION.

#### 1.1 Preamble.

- 1. This Report presents the Quarterly Environmental Monitoring Review for the Issyk-Kul Ring Road Improvement Project (Barskoon-Karakol section, 75.2 km).
- 2. This report is the 1<sup>st</sup> EMR for the project, covering the three months of project work conducted from July to September 2025.

#### 1.2 Headline Information.

- During the reporting period, work was underway to obtain permits, set up and complete construction camps, and install office and residential facilities for staff. Construction of the production facility, including the installation of an asphalt concrete plant (ACP), Crushing and screening plant (CSP), Concrete batching plant (CBP), as well as supporting infrastructure, continued. The contractor also developed quarries and cleared trees along the road. More detailed information is provided below.
  - 2. This Report contains information on the status of activities related to preventing adverse environmental impacts. The observations, corrective actions, and mitigation measures presented in this report are based on a monthly visit inspection conducted by the consultant's specialists on the project road and living and production facilities for the reporting period. Additionally, in September 2025, visual monitoring was conducted using Environmental Checklists of Project facility.
- 3. All observed non-compliances are listed in section 3.3. (Issues Tracking); inspection reports and environmental checklists with a Corrective Action Plan, submitted to the contractor by official letter for corrective actions are presented in Appendices 1 and 2.
- 4. During the reporting quarter, initial instrumental noise and vibration measurements were conducted. Initial instrumental surface water and air quality measurements have been postponed until October 2025.
- 5. The Contractor's environmental management system has been established, namely:
  - personnel responsible for environmental protection, occupational health and safety have been recruited.
  - Site-Specific Environmental Management Plan (SSEMP) was prepared in July 2025, establishing procedures and measures to minimize negative environmental impacts within the specific site. The SSEMP includes environmental policy, objectives and tasks, personnel responsibilities, monitoring plans, waste management, dust, spills, emissions, road safety, emergency response, training, and documentation. The SSEMP developed by the Contractor was approved by the PIU of the MoTC KR on July 21, 2025 (No. 14-9/67 dated July 21, 2025).
  - the daily presence of the Contractor's environmental protection and occupational health and safety personnel on site has been ensured.
- 6. These measures contributed to timely risk response, rapid corrective action, and effective communication with the Engineer.
- 7. The Contractor must understand and consistently comply with environmental protection requirements. Preventive control measures must be applied to prevent non-compliance before

it occurs. Therefore, the Contractor is strongly advised to pay greater attention to environmental performance on an ongoing basis.

## 2. PROJECT DESCRIPTION AND CURRENT ACTIVITIES.

## 2.1 Project Description.

1. The project is in the Issyk-Kul Biosphere Reserve (BRIK), which covers all administrative borders of Issyk-Kul region. The BRIK, which covers an area of 43.1 square kilometers (4,310 ha), is a specially protected natural area included in the World Biosphere Network within the framework of the UNESCO "Man and the Biosphere" program. The BRIK consists of four zones: the core zone: the buffer zone: the transition zone: and the rehabilitation zone. The Karakol-Barskoon road section runs within 1 km from one of the core zones of the Issyk-Kul State Nature Reserve, Ala-Too core zone, and within 10 km from another core zone, Kokui-Kol core zone (Fig. 3). The lake is a Ramsar wetland with biodiversity of global importance and is part of Issyk-Kul Biosphere Reserve. The facility is of primary importance as a wintering place for migratory aquatic birds (up to 70 thousand individuals registered annually). Notable species of aquatic birds include the endangered white-headed duck (Oxyura leucocephala). The lake is the habitat to 28 species of fish, 7 of which are found nowhere else in the world. There are 14 (fourteen) sites of historical and cultural heritage located in a 50-meter zone from the road. Thus, the project belongs to the category "A" for environmental protection in accordance with the ADB Safeguard Policy Statement (SPS).

## 2.1.1 Project Section Location and Basic Design.

- 1. The Kyrgyz Republic is a landlocked mountainous country, and regional trade is heavily dependent on road transport, which dominates the Kyrgyz transport system and heavily relies on road transport. The government of the Kyrgyz Republic asked the Asian Development Bank (ADB) to assist in financing the implementation of the Issyk-Kul Ring Road Improvement Project (Barskoon-Karakol section, 75.2 km).
- 2. Central Asia Regional Economic Cooperation (CAREC) Corridors 1 and 3 provide regional connectivity with neighboring Central Asian countries, including Kazakhstan and the People's Republic of China. The Bishkek-Torugart road (part of CAREC Corridor 1) and the Bishkek-Osh road (part of CAREC Corridor 3) also link the north and south of the country. Furthermore, the Almaty-Bishkek Economic Corridor stimulates economic growth and creates jobs through increased private investment, trade, and the agglomeration of economic activity. The development of the Issyk-Kul Lake region, the country's most popular tourist destination, is an integral part of the Almaty-Bishkek Economic Corridor. The Issyk-Kul Ring Road is also of strategic importance for the local population's livelihoods, including women and vulnerable groups, as it expands employment opportunities and facilitates access to markets for agricultural products and livestock. The Issyk-Kul Ring Road Improvement Project will contribute to these initiatives by addressing the internal connectivity issue between the Issyk-Kul Ring Road and CAREC Corridor 1.
- 3. The entire Issyk-Kul Ring Road has been severely damaged. The road is in poor condition, with low capacity and inadequate traffic volumes during the tourist and harvest seasons, posing a safety risk. Roadside public services, such as visitor centers, public restrooms, and street lighting, are often insufficient, which reduces tourist satisfaction. The government is reconstructing the ring road at its own expense, with the assistance of other development partners, including the Arab Coordination Group and the European Bank for Reconstruction and Development. The project aims to reconstruct the remaining section of the road and support the implementation of an action plan jointly developed by the Ministry of Transport and Communications (MoTC KR) and the Ministry of Culture, Information, Sports, and Youth Policy for the development of tourism infrastructure in the Issyk-Kul region by providing services along the project road.
- 4. The Project aims to improve transport communication and market access in the Kyrgyz Republic. The Project will result in efficient freight and passenger traffic movement along the

Issyk-Kul Ring Road, improving the safety of both road users and pedestrians and minimizing the road's environmental impact in terms of noise from passing traffic by reconstructing the asphalt pavement.

- 5. The Project will improve the following socio-economic indicators of the regions of the Kyrgyz Republic:
- Reduction of transport costs due to improved road conditions.
- Increased local and international traffic.
- Additional income opportunities for residents.
- Creation of new jobs.
- Good condition of vehicles /Reduced operating costs.
- 6. The Issyk-Kul Ring Road Improvement Project, which envisages the reconstruction of the existing 75.2-km ring road from the village of Barskoon (km 141+600) to the city of Karakol (km 220+000) in the Issyk-Kul region of the Kyrgyz Republic. As a result of the reconstruction, the existing two-lane road will be widened to four lanes. The project also includes the construction of a new bridge, culverts, rest areas, bus stops, and pedestrian paths, as well as the installation of street lighting, traffic islands, and other elements that will improve road safety. The project road map is shown in Figure 1 and 2. The villages located along this section of the road are listed in Table 1 and shown in Figure 3.

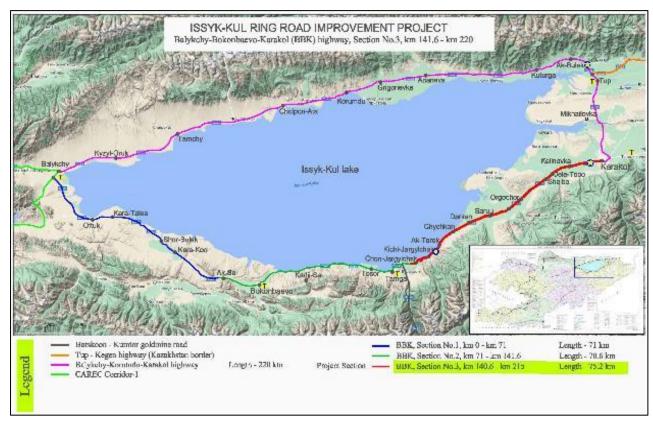




Figure 1: Map of the Issyk-Kul Ring Road (Barskoon-Karakol section, 75.2 km).

Figure 2: Map of the location of the Barskoon-Karakol section, km 141+600 - km 220+000.

7. The project road is located in the Jeti-Oguz and Ak-Suu districts. In the Jeti-Oguz district, the project road (km 141+600 – km 210+000) passes through the settlements/villages of Chon-Zhargylchak, Kichi-Jargylchak, Ak-Terek, Chychkan, Darkhan, Saruu, Kyzyl-Suu, Orgochor, Shalba, Chirak, Dzhele-Tobe, Kytai, Kyzyl-Dyikan, and Kalinovka. In the Ak-Suu district (km 210+000 – km 220+000), it crosses a small part of the city of Karakol (Figure 3). For most of its length, the existing section of the ring road from Barskoon to the city of Karakol crosses agricultural lands planted with vegetables, grain, and forage grasses.



Figure 3: Location of settlements on the Barskoon-Karakol section, km 141+600 – km 220+000.

Table 1: Names of Settlements along the Project Road Section.

Nº	Settlement	Nº	Settlement	Nº	Settlement	Nº	Settlement
1	Barskoon	7	Saruu	13	Ak-Dobo	19	Kytai
2	Chon Zhargylchak	8	Zhalgyz-Oruk	14	Munduz/Ak-Usten	20	Kyzyl Dyikan/Baltabay
3	Kichi-Jargylchak	9	Kyzyl-Suu	15	Chirak	21	Kalinovka/Konkina
4	Ak-Terek	10	Ozgochor Ozgochor	16	Jele-Toboi	22	Yrdyk
5	Jenish/Chychkan	11	Svetlaya Polyana	17	Jeti-Oguzv	23	Karakol
6	Darkhan	12	Shalba/Tilekmat	18	Kyzyl-Suu	23	Naiakui

8. The project passes inside about total 32 km length of settlement areas.

Features will be provided for settlement areas:

- Lighting (80 km length)
- Signalization (141 set)
- Pedestrian ways (47 km)
- Pedestrian Safety Fences
- Service ducts (reserve channels)
- New bus stops (104 bus stops)

## 2.1.2 Work Scope under Contract.

1. Details of the designed project road section:

To restore and lay the project road to Technical Category I from Barskoon (km 141+600) to Karakol (km 220+000) in accordance with the National Standard of Kyrgyzstan with geometric and structural requirements with an estimated speed of 120 km/h outside settlements and 60 km/h in villages.

- 2. The road was designed in accordance with the geometric design standards of the Kyrgyz Republic and, accordingly, must effectively withstand traffic loads over the projected service life. The road has four lanes, consisting of the carriageway width (the sum of the lane widths) and the shoulder width. The design elements for the project road cross-section are as follows:
  - Number of lanes: 4
  - Lane width: 3.5 m
  - Carriageway width: 14.00 m
  - Shoulder width: 2.5 m (of which 0.50 m asphalted)
  - Total road width: 22.6 m (in populated areas up to 28.8 m)
- 3. The project will improve connectivity and safety along the route with a climate-resilient four-lane, HMA, 75.2 km highway.
- Culverts On the main road-175 pcs, (5 275 m).
- Culverts On the ramps-241 pcs (5 062 m).
- Ditches 61 344 m<sup>3</sup>.
- Parapet barriers "Sapozhok" (24 998 m).

- Parapet fence "New Jersey" (71 352 m).
- Parking places with rest area- 6 pcs.
- Bus stops 104 pcs.
- Asphalt (9+6=15 cm) 204 000 m<sup>3</sup>.
- 4. The project includes nine (9) Underpasses.
- One (1) Underpass is Box Culvert 4.0x2.5 m.
- Eight (8) Underpasses are Box Culvert 3.0x2.5 m.

Total length of underpasses is 249 m.

- 5. There are a total of five (5) bridges along the project road which consist of precast beams and R/C slab
- Construction of four (4) new bridges, and
- Rehabilitation of one (1) existing bridge.

Total length of the bridges is 107 m.

Additionally, one (1) Aqueduct (64 m).

- 6. The project provides for the construction and repair of the following engineering structures and communications, as well as the parameters of the scope of work.
- Asphalt pavement 103 963 m<sup>3</sup>;
- Binder with 9 cm thickness 62 225 m<sup>3</sup>;
- Wearing layer with 6 cm thickness 41 738 m<sup>3</sup>;
- Base, with 20 cm thickness 148 771 m<sup>3</sup>;
- Lower shoulder with 20 cm thickness 70 648 m<sup>3</sup>;
- Upper shoulder with 15 cm thickness 61 301 m<sup>3</sup>;
- Subbase with 25 cm thickness 361 612 m<sup>3</sup>.

## 2.2 Project Contracts and Management.

1. Figure 4 shows a scheme of project activities' organizational structure and management. Table 2 lists representatives of the main organizations involved in the project and related to environmental protection. A list of the representatives currently involved in the organization and implementation of the project work has been updated and shown in Tables 3 and 4.

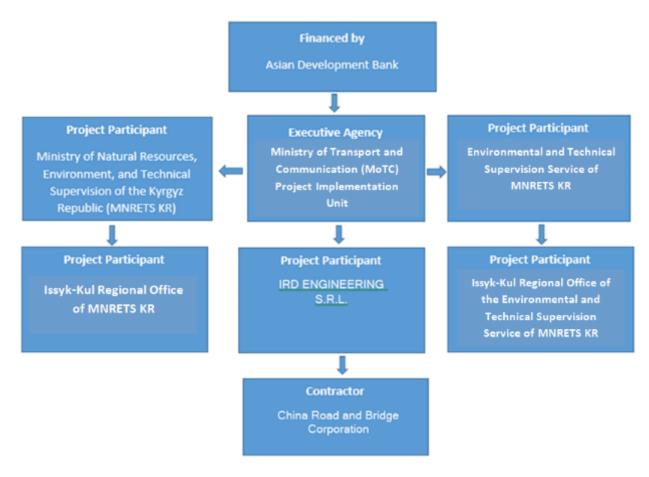


Figure 4: Project Organizational Structure and Management.

Table 2: Main organizations involved in the project.

Nº	Name of company	Activities in the project	Responsible persons for environmental protection	Contact details
1	ADB	Country Environmental Focal	Mr. Lizandro Racoma	lracoma@adb.org
2	ADB	Environmental Specialist (Consultant)	Sultan Bakirov	sbakirov.consultant@adb.org
3	PIU MOTC KR	Environmental Officer	Asylbek Abdygulov	asylbeka@piuMOTC.kg
4	Consulting Company: IRD ENGINEERING S.R.L.	International Environmental Specialist	Olga Syzonenko	olga.syzonenko82@gmail.com
5	Consulting Company: IRD ENGINEERING S.R.L.	National Environmental Specialist	Nasiba Akhmetova	ahmatovanm@gmail.com
6	Contracting company: China Road and Bridge Corporation	Environmental Specialist, Section 1	Isake Beisheev	bejseevisake@gmail.com
7	Contracting company: China Road and Bridge Corporation	Environmental Specialist, Section 2	Daniyar Kaiduev	daniar.kaiduev@mail.ru

Table 3: List of Key Consultant's Employees.

International Employees	International Employees				
Team Leader/Chief Resident Engineer	Selcuk Mutlu				
Structures/Bridges Engineer	Sabir Mehrabov				
Pavement/Materials Engineer	Seyfettin Akinci				
Environmental Specialist	Olga Syzonenko				
Social and Resettlement Specialist	Irakli Kaviladze				
Road Safety Audit Specialist	Egidijus Skrodenis				
Contract Specialist	Mehman Huseynov				
Project Management Software Specialist	Baki Kuran				
National Employees					
Deputy Team Leader	Ibragim Oserov				
Structures/Bridge Engineer	Sherikbek Turdubaev				
Pavement/Materials Engineer	Kerim Kaparov				
Environmental Specialist	Nasiba Akhmatova				
Social/Resettlement Specialist	Azamat Omorbekov				
Road Safety Specialist	Ruslanbek Kasymov				
Health and Safety Specialist	Ainagul Isakova				
Biodiversity Specialist	Sergei Krivoruchko				
Vibration Specialist	Iskender Bulanbekov				
Quality Control Engineer	Nurlan Sadykov				
Quantity Engineer	Saadalbek Kaparov				
Topographic Surveyor	Nurlan Nuraliev				
Inspector - Structures	Kylych Adylbek uulu				
Inspector - Roads, Drainage, Electrical	Temirlan Nurkalykov				
Laboratory Technician	Uraimov Nurbek				
Laboratory Technician	Aibek Sagymbaev				
Laboratory Technician	Talgarbek Ibraev				
Topographic Technician	Nurmamat Baimyrzaev				
Topographic Technician	Temirlan lusupov				
Quantity Surveyor	Maksat Satindiev				
CAD Operator	Atai Shekeev				
Design Engineer	Edil Shabdanov				
Office Manager/Accountant	Ulugbek Kadyrbekov				
Translator/Secretary	Nursultan Suiunbekov				

Table 4: List of Key Contractor's Employees.

		Personnel				
Nº	Position	Section 1	Section 2			
	International Employees					
1	Project Manager	Sun He	Xie lei			
2	Deputy Project Manager	Guo Xiangchun	Chu Chunlin			
3	Project Chief Economist	Shang Guofu	Li Tuo			
4	Chief Engineer of the Project	Li Shanpu	Hu Yingming			
5	Head of the Engineering Department	Li Xin	Sun Haonan			
6	Head of the Technology Department	Zhao Hongshuai	Sun Shuai			
7	Technician	Wang Jiaxiang	-			
8	Measurement team leader	Yu Si				
9	Laboratory Director	Jiao Yunshuai	-			
10	Laboratory Engineer	-	Cui Chuanshui			
11	Laboratory Engineer	-	Zheng Yunchang			
12	Head of Materials Department	Sun Enzhong	Wang Ruiming			
13	Procurement Specialist	-	Wang Chun			
14	Contract Department Officer	Li Liang	-			
15	General Affairs Specialist	-	Yang Jing			
16	Working District Director	Han Jianping	-			
17	Head of the vehicle fleet	-	Liu Wenguo			
18	Head of the vehicle fleet	-	Li Meng			
19	Chef	Zhao Yongxian	-			
		Local Employees				
20	Translator	Kazybek kyzy Eliza	Zakaria Khakimov			
21	Translator	Aizhamal Zamirova	Kamilbek Kenzhevaev			
22	Translator	Mederbek Mambetov	Anvar Ismaev			
23	Translator	-	Beishen uulu Rysbek			
24	Designer	-	Tilek Myktar-al Seravan			
25	Environmental protection officer	Isake Beisheev	Daniyar Kaiduev			
26	Driver	Muhamed Guzirov	-			
27	Cleaner	Asyl Akmatova	-			
28	Safety officer	Omurbek Zhamanakov	Mairambek Kurmanaliev			
29	Greening staff	Akylbek Ormonov	-			

<sup>2.</sup> Table 5 below shows the details of the contract of the contracting company responsible for the road construction work.

Table 5: Project Administrative & Contractual Details (Project Key Data).

Formal Project Name	Reconstruction of 75.2 km to 4 lanes of the Barskoon-Karakol road Section of the Issyk Kul Ring Road
Project No	IRRIP/OCB/CW/01
Project Summary	Reconstruction of 75.2 km of existing 2-lane road into a 4-lane, climate-resilient highway. Aims: boost connectivity, safety, tourism, and economy. Outputs: road upgrades, safety features, maintenance. Project incorporates ADB safeguards for environmental protection, involuntary resettlement, and indigenous peoples; promotes gender equality through inclusive designs and workforce participation.
Contract Number	OCB No. IRRIP/OCB/CW/01
Contract Scope	Widening to four 3.5 m lanes (total asphalted width 17.6 m, with median and paved shoulders); design speeds of 120 km/h (rural) and 60 km/h (urban); replacement/repair of 5 bridges and 1 bridge deck; construction of 8 pedestrian, cattle underpasses, retaining walls, shoulders, sidewalks, and drainage systems. Climate-Resilient Safety Features: Includes rest areas, vehicle charging stations, 104 bus stops, 47 km walkways, 40 km streetlights; \$12.5M for safety (high-visibility signs, audio-tactile markings, barriers, raised crossings, inclusive designs for elderly, women, children, and persons with disabilities); \$19.15M adaptation measures (e.g., flood-resistant drainage); \$3.05M mitigation (e.g., emissions reduction).
Contract Type	Building works designed by the Employer (FIDIC Red Book 2017)
Employer	Ministry of Transport and Communications of the Kyrgyz Republic (MoTC KR)
Consultant (Engineer)	IRD ENGINEERING S.R.L.
Contractor	CRBC - China Road and Bridge Corporation
Contract Amount	\$ 119,639,323.75
Date of Bid & Letter of Accept.	BID: 01 November 2024 - LOA: 10 April 2025
Commencement Date	1 September 2025
Planned Completion Date	1 September 2028
Contract Signing Date	28 April 2025
Time for Completion	1,095 days (36-months)
Defects Liability Period	1,825 days (60-months)
ADB Loan No and Date	4485-KGZ(COL), dated November 04, 2024
ADB Grant No and Date	0965-KGZ(SF), dated November 04, 2024
ADB Loan Effectiveness Date	24 Apr 2025
ADB Loan Closing Date	31 Dec 2033

## 2.2.1 Project Management.

- 1. Relevant institutions working with the project include:
- Ministry of Finance of the Kyrgyz Republic (MOF);
- Ministry of Transport and Communication of the Kyrgyz Republic (MOTC);
- Project Implementation Unit (PIU) under MOTC;
- Ministry of Energy and Industry of the Kyrgyz Republic (MOEI);
- Ministry of Natural Resources, Environment and Technical Supervision of the Kyrgyz Republic (MNRETS);
- Department of Disease Prevention and State Sanitary and Epidemiological Surveillance of the Ministry of Health of the Kyrgyz Republic (DDPSSES).
- 2. MOTC is responsible for developing the transport sector and is the project's Execution Agency (EA). It has overall responsibility for planning, design, implementation, and monitoring. PIU works under MOTC and performs tasks assigned by MOTC.
- 3. MOF KR is the authorized government body responsible for coordinating with ADB and other donors regarding foreign aid issues.
- 4. MNRETS is the leading environmental state agency responsible for state policy in this area and coordinating the actions of other government agencies in these matters. Its functions include:
- development of environmental policy and its implementation;
- carrying out state ecological expertise;
- issuance of environmental licenses;
- environmental monitoring:
- provision of environmental information services.
- 5. MOEI monitors compliance with:
- environmental legislation, established rules, limits, and norms for the use of natural resources, standards for emissions and discharges of pollutants, and disposal of waste in the environment;
- II. industrial safety requirements for construction, expansion, reconstruction, technical reequipment, operation, conservation, and liquidation of hazardous production facilities;
- III. requirements of land legislation;
- IV. safety requirements for equipment and facilities for storing and dispensing oil products and gases, lifting cranes;
- V. requirements for the rules of safe operation during construction, installation, and adjustment of electrical networks and electrical equipment.
- 6. DDPSSES supervises the sanitary and epidemiological welfare of the population, the safety of goods, products, environmental objects, and conditions, and the prevention of the harmful effects of environmental factors on human health.

## 2.3 Project Activities during the Current Reporting Period.

## 2.3.1 Contractor's Permitting Documentation.

- 1. In accordance with the SSEMP, the Contractor is obliged to comply with all legislative and regulatory requirements of the Kyrgyz Republic applicable to the project activities.
- 2. The table below lists the documents that the Contractor must have before starting construction work.

Table 6: The status of obtaining the contractor's permitting documentation.

No.	Legal obligation	Correspondence (No/Yes/partially)	Comments					
	General							
1	Agreement for environmental monitoring	Partially	In the process of signing (until end of September 2025)					
2	Ecological passport	No						
3	Draft waste generation standards	No						
	Lot 1 (km 140	, 6 – km 182+8	860).					
	Camp at	km 150+610						
4	Permission to use the site from the local authorities	Yes	Resolution of the aiyl okmotu village aimak Zhargylchak No. 93 dated July 14, 2025					
5	Coordination of the selection of a site for the construction of a camp by the Issyk-Kul Regional Office of the Ministry of Natural Resources, Environment and Technical Supervision of the Kyrgyz Republic	Yes	Conclusion of the IKRO MNRETS No. 221–1/2025 dated August 26, 2025					
6	Coordination of the camp construction project with the IKRO MNRETS	No	The commencement of construction of the camp is unacceptable without the approval of the camp construction project (Conclusion of the IKRO MNRETS No. 221–1/2025 dated August 26, 2025).					
7	Agreement with a utility company for the removal of solid waste and wastewater	Partially	In the process of signing (until end of September 2025)					
	duction site, asphalt plant, concrete batching pla +580	int, reinforced con	crete products, construction camp km					
8	Permission to use the site from the local authorities	Yes	Resolution of the aiyl okmotu village aimak Zhargylchak No. 92 dated July 14, 2025 Resolution No. 64 of June 26, 2025 of the local Kenesh village aimak Zhargylchak 1st convocation					
9	Coordination of the site for the construction of the base by the Issyk-Kul Regional Office of the Ministry of Natural Resources, Environment and Technical Supervision of the KR (IKRO MNRETS)	Yes	Conclusion of the IKRO MNRETS No. 183–1/2025 dated July 2, 2025					
10	Coordination of the construction project of asphalt concrete plants, concrete batching plants, and reinforced concrete products with the IKRO MNRETS	No	The commencement of construction of the asphalt plant and crash plant base is unacceptable without the approval of the camp construction project (Conclusion of the IKRO MNRETS No. 183–1/2025 dated July 2, 2025)					

No.	Legal obligation	Correspondence (No/Yes/partially)	Comments				
11	Agreement with the Municipal Utility for the Removal of Solid Waste and Wastewater	Partially	In the process				
	Quarries						
12	Permission from the Ministry of Natural Resources and Technical Supervision of the Kyrgyz Republic for the extraction of materials	Yes	Permit from the MNRETS for the development of 5 quarries No. 05-6/5723 dated July 28, 2025 (km. 163+000, 167+580, 142+580, 174+400, 178+800).				
13	Permission to use sites for quarries from local authorities (km 138+000, 142+580, 148+820, 151+280, 152+400, 152+820, 163+000, 167+580, 174+400, 174+680, km. 178+800, 174+860)	Yes	Resolution of the aiyl okmotu Barskoonsky Aiyl aimak No. 76 of June 30, 2025 on the allocation of a site for quarry development (km. 138+000, km. 142+580).  Resolution No. 64 of June 26, 2025, of the local Kenesh village aimak Zhargylchak 1st convocation, for the development of quarries (km. 148+820, 151+280, 152+400, 152+820, 163+000, 167+580)  Resolution of the local Kenesh Kyzyl-Suu Aiyl Aimak No. 68 of June 27, 2025 (quarries km 174+400, 174+680, km 178+800, 174+860)				
14	Coordination of sites for quarries by IKRO MNRETS.	Yes	No. 182–1/2025 of July 2, 2025				
	Constr	uction work					
15	Permission from the IKRO MNRETS for the placement of unsuitable soil in the environment	Yes	No. 001535 dated July 22, 2025				
16	Allocation of land for dumping unsuitable soil from aiyl okmotu	Yes	The sites for waste dumps have been agreed upon with aiyl okmotu				
17	Coordination of sites for the placement of spoil areas by the IKRO MNRETS: km 142+850, 152+450, 167+780, 171+340, 172+300, 178+420, 177+280, 179+670, 180+400.	Yes	The sites for waste dumps have been agreed upon with with IKRO MNRETS				
18	Permission to cut down trees	Yes	Tree inspection Act compiled by the commission on June 25, 2025 (the commission included representatives of the contractor, consultant and representative of the IKRO MNRETS) 2,832 trees cut down. In fact, 2,646 trees were cut down. 186 trees were saved. The act confirming the felling of 2,646 trees was drawn up on September 10, 2025.				
19	Permit for emissions of pollutants into the atmosphere	No					
20	Waste management log	No					
21	Dust suppression log	No					
	Lot 2 (km 182+860 – km 220).						
Car	np, office in the village of Chyrak km 199+460						
22	Allocation of a site by local authorities	Yes	Resolution of the aiyl okmotu Jeti-Oguz Aiyl aimak No. 130 of April 29, 2025				

No.	Legal obligation	Correspondence (No/Yes/partially)	Comments			
23	Coordination of design documentation in the IKRO MNRETS	No				
	Production site, asphalt plant, concrete batching plant, reinforced concrete products, construction camp k 202+220					
24	Permission to use the site from the local authorities	Yes	Resolution of the aiyl okmotu Jeti-Oguz Aiyl aimak No. 202 of July 21, 2025 Resolution No. 40 of July 11, 2025 of the local Kenesh aiyl aimak Jeti -Oguz XXIX convocation of the 5th session			
25	Coordination of the site by the Issyk-Kul Regional Office of the Ministry of Natural Resources, Environment and Technical Supervision of the KR (IKRO MNRETS)	Yes	Conclusion of the IKRO MNRETS No. 206 -1/2025 dated July 25, 2025			
26	Agreement with a utility company for the removal of solid waste and wastewater	Partially	In progress			
	Qı	uarries				
27	Permission from the Ministry of Natural Resources, Environment and Technical Supervision of the KR for the extraction of materials	No				
28	Permission from local authorities for the use of sites for quarries: km 186+100, 191+500, 193+760, 199+460, 199+660, 202+220, 208+940	Yes	Resolutions of the relevant local authorities provide for the allocation of sites for quarry development. These sites are indicated only as outlines with defined areas. The contractor suggests quarries in relation to the project road (PR). Currently, there is no precise identification of which outlines belong to which quarry, making it difficult to compare them and determine the availability of permits.			
29	Coordination of sites for quarries by the IKRO MNRETS	Yes	The conclusion of the IKRO MNRETS No. 189–1/2025 dated July 14, 2025, does not provide information on the number of quarries, their contours, or location relative to the designed road.			
	Cons	truction work				
30	Permission from the IKRO MNRETS for the placement of unsuitable soil in the environment	No				
31	Allocation of land for dumping unsuitable soil from aiyl okmotu	Yes	Resolution of the aiyl okmotu Jeti-Oguz Aiyl aimak July 21, 2025 Resolution of July 11, 2025 of the local Kenesh aiyl aimak Jeti -Oguz XXIX convocation of the 5th session			
32	Coordination of spoil areas for the placement of waste soil dumps by the IKRO MNRETS: km 185+822, 186+100, 199+119, 199+700, 199+760, 199+984, 201+350, 202+920	No				
33	Permission to cut down trees	Yes	Tree inspection Akt compiled by the commission on July 6, June 7, June 14 2025 (the commission included representatives of the contractor, consultant and representative of the IKRO MNRETS) 2,740 trees cut down. The act confirming the felling of 2,740			

No.	Legal obligation	Correspondence (No/Yes/partially)	Comments
			trees was drawn up on September 10, 2025.
34	Permit for emissions of pollutants into the atmosphere	No	

3. The process of obtaining permits is currently ongoing.

#### 2.3.2 Road Construction Works.

- 1. During the reporting period, work was underway to obtain permits, set up and complete construction camps, and install office and residential facilities for staff. Construction of the production facility, including the installation of an asphalt concrete plant (ACP), Crushing and screening plant (CSP), Concrete batching plant (CBP), as well as supporting infrastructure, continued. The contractor also developed quarries and cleared trees along the road. More detailed information is provided below.
- 2. During the reporting period, the following work has been carried out throughout the project area:

### Surveying:

- Surveying of natural ground levels fully completed.
- Surveying of road cross-sections fully completed.

## **Camps and Production Sites:**

Kichi-Jargylchak Camp (km 150+610 LHS):

- Modular residential units constructed.
- Septic system installed.

Ak-Terek Camp (km 152+700 LHS):

- Construction of residential blocks and office facilities is ongoing.

Darkan village camp (km 167+360 RHS):

- Constructed: offices, living quarters, restrooms, showers, waste disposal areas, laboratory, septic tank.

Chyrak Camp (km 199+460 LHS):

- Offices, residential units, sanitary facilities, showers, and waste storage areas completed.
- Chyrak Camp (km 202+220 RHS):
- Offices, residential units, sanitary facilities, showers, waste storage areas and septic tank completed.

Production sites (km 167+360 and 202+200):

- Asphalt concrete plant (ACP) installed.
- Crushing and screening plant (CSP), Concrete batching plant (CBP), and Reinforced concrete products manufacturing facility (RCP) established.
- Administrative and residential blocks completed.

#### **Construction and Production Works**

Quarry Development:

- Extraction of inert materials at multiple sites: Section 1: km 142+580, km 152+820, km 163+000, km 167+580; Section 2: km 199+660

#### **Earthworks:**

- Topsoil stripping completed.
- Excavation of water-saturated soils.
- Replacement of substandard materials in embankments.
- Formation and stockpiling of unsuitable soils.

## Site Clearance (Tree Removal):

- Section 1: 2,646 trees removed.
- Section 2: in process.

## **Environmental and Support Measures:**

Permits and approvals obtained.

#### **Dust Control:**

- Watering of access and operational roads implemented.

## **Environmental Monitoring:**

- Noise and vibration measurements conducted.
- Air and water monitoring not yet performed.
- 3. The Contractor's work plan was not provided during the reporting period.
- 4. Statistics of the main construction works planned and completed at the site from 01.07.2025 to 30.09.2025 are presented in Table 6.

Table 7: Planned & actual main work item quantities.

Work Item	Unit	Total Quantity	Planned %	Actual %	Var.	Status
Cut Excavation	М3	482 503				
Embankment	M3	1 755 266		9.1		Ongoing
Subgrade Layer (Working layer)	М3	603 761				
Preparation of existing subgrade	M2	2 055 600				
Subbase Layer (Main Road, shoulders, and ramps)	М3	607 968				
Upper Shoulder with milled asphalt material	М3	54 463				
Base Layer	М3	312 461				
Binder Layer	M3	122 718				
Wearing (SMA) Layer	M3	81 812				
Binder Layer on ramps	M3	6 640				
Pipe Culverts (Main Road)	pcs	87				
Box Culverts (Main Road)	pcs	88				
Pipe Culverts (Ramps)	pcs	69				
Box Culverts (Ramps)	pcs	172				
Underpass	pcs	9				

Bridges (Reconstruction)	pcs	4
Bridges (Rehabilitation)	pcs	1
Aqueduct	pcs	1
New – Jersey type parapets	no	22 075
Sapozhok type parapets	no	9 259
Bus stops	no	104
Lighting	km	80.38
Traffic Lights	set	141
Implementation of safety measure	%	100

5. Below are the photo materials of the work being carried out.



Figure 5: Construction of a Camp in the village of Kichi-Jargylchak, km 150+610 (LHS).



Figure 6: Camp in the village of Kichi-Jargylchak, km 150+610 (RHS), construction of a septic tank.



Figure 7: Production site at km 167+360 (RHS), preparatory work: topsoil has been removed, and the site has been leveled.



Figure 8: Topsoil's spoil areas km 167+780 (RHS).



Figure 9: Measuring the diameter of trees.



Figure 10: Tree felling.



Figure 11: Removal of waterlogged material at km 188+800 (LHS).



Figure 12: Quarry development km 163+000 (RHS).

- 6. Below are the most significant challenges encountered by the Contractor during the period from 01.07.2025 to 30.09.2025.
- 7. In accordance with Resolution No. 191 of the Jeti-Oguz Aiyl Aimak Aiyl Okmotu dated July 9, 2025, and Resolution No. 37 of the Jeti-Oguz Aiyl Aimak Local Council dated June 27, 2025, land pSections are planned to be allocated for a Production site, a construction camp and quarries. Currently, the pSections are only marked with outlines indicating their area without specifying their intended purpose, making it difficult to assign them to specific sites. The contractor has provided a list of quarries assigned to a grid along the project road, but no comparison with these outlines has been made, complicating the identification of their compliance with the allocated pSections and delaying the issuance of permits.
- 8. High dust formations due to dry weather heavily impact air quality and increase traffic risks. Therefore, dust suppression is carried out to mitigate impact and risks in the areas where construction works are being carried out and on the roads near the settlements along the project site. There is no approved dust suppression schedule.
- 9. The following watering machines were used daily from 7:30 to 19:00 for dust suppression: Section 1 four Dong Feng units (two units 12-ton and two units 10-ton); Section 2 three water tankers were used, including two DE LONG brand with a 15-ton capacity and one KAMAZ water tanker with a 10-ton capacity.
- 10. Water used for dust suppression is taken from the river Kichi-Jargylchak (km 149+680), the river Ak-Terek (km 152+760), the river Dzhuku (Darkhan village, km 170+220), the river Dzhuku (Saruu village, km 172+200), the river Chon Kyzyl-Suu (km 181+980). The contractor implements sufficient dust suppression measures at the site.



Figure 13: Km 152+580 dust suppression on access roads to the quarry is ensured.



Figure 14: Dust suppression along the road is provided.

### 2.3.3 Quarries.

- 1. On the project road (Barskoon Karakol section, km 141+600 km 220), 19 pSections have been allocated for quarries since the beginning of the project: 12 pSections on Section 1 and 7 pSections on Section 2.
- 2. For 19 quarries, the Contractor received permitting documents from local authorities (Permission from local authorities for the use of the allocated land pSection) and the Ministry of Natural Resources, Ecology and Technical Supervision of the Kyrgyz Republic (permission selection of the site by ecologists, Temporary permit for quarry development). For 10 quarries (8 quarries of Section 1 and 2 quarries of Section 2), the Contractor received Permissions for the extraction of materials from the Kyrgyz Geological Service (KGS) under the Ministry of Natural Resources, Ecology and Technical Supervision (MNRETS) of the Kyrgyz Republic. The main characteristics of the quarries are presented in Table 8.

**Table 8: Characteristics of the quarries.** 

Place - position, km	L = left side of the road; R = right side	Distance from the road, m	S, ga	V, m <sup>3</sup>	Conclusion IKRO MNRETS	Permission KGS MNRETS	Development Yes/No			
Lot 1										
142+580	R	401	1.98	180,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5723 dated 07/28/25	Yes			
142+580	R	1269	14.95	200,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5871 of August 1, 2025	Yes			
148+820	R	1745	14.29	600,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5871 of August 1, 2025				
152+280/820	R		50.68	10,136,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5871 of August 1, 2025	Yes			
163+000	R		24.5		No. 182–1/2025 dated 02.07.25	No. 05- 6/5723 dated 07/28/25	Yes			
167+580	R	756	67.49	1,200,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5723 dated 07/28/25	Yes			
174+400	R	3764	34.83	400,000	No. 182–1/2025 dated 02.07.25	No. 05- 6/5723 dated 07/28/25	Yes			
178+800	R		20.50		No. 182–1/2025 dated 02.07.25	No. 05- 6/5723 dated 07/28/25				
Lot 2										

191+500	R	482	15.3	450,000	No. 189–1/2025 dated July 14, 2025	No. 05- 6/5871 of August 1, 2025	
199+660	R	16.31	6.6	100,000	No. 189–1/2025 dated July 14, 2025	No. 05- 6/5871 of August 1, 2025	Yes

- 3. The quarries' areas are in suitable condition. During the reporting period, the following quarries were operated:
- six quarries on Section 1: km 142+580 (401 m from the road), km 142+580 (1269 m from the road), km 152+820, km 163+000, km 167+580, km 174+400.
- one quarry on Section 2 (km 199+660).
- 4. For the remaining 9 quarries, the Contractor is awaiting permission to extract materials from the Kyrgyz Geological Service (KGS) under the Ministry of Natural Resources, Ecology and Technical Supervision (MNRETS) of the Kyrgyz Republic.
- 5. GIS locations of quarry sites will be presented in the next quarterly report.

## 2.3.4 Storage Areas (Spoil Areas).

- 1. On the project road (Barskoon Karakol section, km 141+600 km 220), since the beginning of the project, 17 areas have been allocated for spoil areas: 9 areas on Section 1 and 8 areas on Section 2.
- 2. The Contractor has obtained permits from local authorities for 17 spoil areas (Local Authority Permit for the Allocation of Sites for the Disposal of Unsuitable Soil).
- 3. The Contractor has also obtained Permit from the IKRO MNRETS for the Disposal of Unsuitable Soil in the Environment and Approval of Sites for the Disposal of Unsuitable Soil Dumps from the IKRO MNRETS for all nine spoil areas in Section 1, namely: km 142+850, 152+450, 167+780, 171+340, 172+300, 178+420, 177+280, 179+670, and 180+400.
- 4. For the spoil areas of Section 2, namely: km 185+822, km 186+100, km 199+119, km 199+700, km 199+760, km 199+984, km 201+350, km 202+920 Permission from the IKRO MNRETS for the placement of unsuitable soil in the environment and Approval of sites for the placement of spoil areas of unsuitable soil from the IKRO MNRETS is in the process of being obtained.
- 5. During the rest of the reporting period of the project, the storage areas were not used.
- 6. The Contractor has concluded/received all necessary permits from aiyl okmotum, IK MNRETS for the disposal of unsuitable material (areas for waste dumps). In the future, these land sections will be suitable for commercial use.

## 2.3.5 Production Sites Territory.

1. It is planned to organize production sites with the placement of an asphalt concrete plant (ACP), a crushing and screening plant (CSP), a concrete batching plant (CBP), and the production of reinforced concrete products (RCP) on sections km 167+360 RHS (Section 1) and km 202+220 RHS (Section 2).

- 2. The Contractor has received permits for the use of sites for production facilities from local authorities, namely:
- for Production site Section 1, km 167+360 RHS:
  - - Resolution of the aiyl okmotu of the aiyl aimak of Zhargylchak No. 92 dated July 14, 2025
  - - Resolution No. 64 dated June 26, 2025, of the local Kenesh of the aiyl aimak of Zhargylchak of the 1st convocation.
- for Production site Section 2, km 202+220 RHS:
  - - Resolution of the aiyl okmotu of the Jeti-Oguz aiyl aimak No. 202 of July 21, 2025
  - - Resolution No. 40 of the local Kenesh of the aiyl aimak of the Jeti-Oguz XXIX convocation, V-th session of July 11, 2025.
- 3. The Contractor received approvals for Production site sites from the Issyk-Kul Regional Office of the Ministry of Natural Resources, Ecology and Technical Supervision (IKRO MNRETS), namely:
- for Production site Section 1, km 167+360 RHS:
  - - Conclusion of the IKRO MNRETS No. 183-1/2025 dated July 2, 2025.
- for Production site Section 2. km 202+220 RHS:
  - - Conclusion of the IKRO MNRETS No. 206-1/2025 dated July 25, 2025.
- 4. Construction of production sites is not complete and will continue into the next quarter. During the reporting period, the topsoil was removed, and development of the production facilities began (Figures 15-18).



Figure 15: Removal of the topsoil on the territory designated for the development of the Production site of Section 1, km 167+360 RHS.



Figure 16: Development of the Production site of Section 1, km 167+360 RHS.

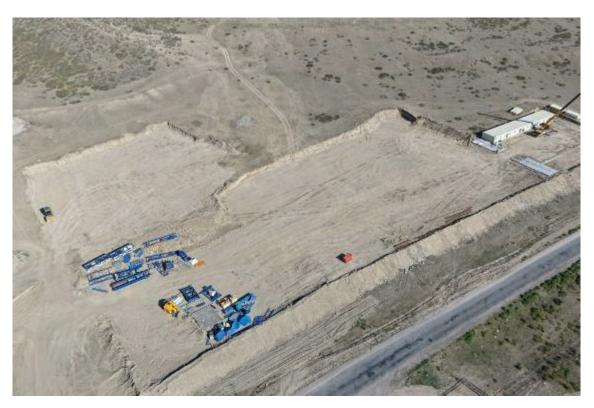


Figure 17: Removal of the topsoil on the territory designated for the development of the Production site of Section 2, km 202+220 RHS.



Figure 18: Development of the Production site of Section 2, km 202+220 RHS.

5. Both the first Production site (km 167+360 and km 202+220) are located in accordance with the requirements of the SSEMP, namely at a distance of at least 500 m from nearby

residential buildings and, to avoid possible contamination, at a distance of at least 50 m from water sources.

## 2.3.6 Camps.

- 1. During the reporting period, the Contractor organized five worker accommodation camps and offices:
- a. Kichi-Jargylchak village, km 150+610 LHS, 30 m from the road worker accommodation camp (for 80 people);
- b. Ak-Terek village, km 152+700 LHS, 10 m from the road worker accommodation camp, office (for 60 people);
- c. Darkan village, km 167+360 RHS, 750 m from the road Camp for workers' accommodation, office (for 30 people);
- d. Chyrak village, km 199+460 LHS, 220 m from the road worker accommodation camp, office (for 96 people);
- e. Chyrak village, km 202+220 RHS, 6 512 m from the road worker accommodation camp (for 30 people) and a laboratory.
- 2. The Contractor has received Permits for the use of sites for Production sites from local authorities, namely:
- for the Camp in the village of Kichi-Jargylchak, km 150+610 LHS (Section 1):
  - a. Resolution of the aiyl okmotu of the aiyl aimak of Zhargylchak No. 93 dated July 14, 2025
- for the Camp in the village of Darkan, km 167+360 RHS (Section 1):
  - b. Resolution of the aiyl okmotu of the aiyl aimak of Zhargylchak No. 92 dated July 14, 2025
  - c.Resolution No. 64 dated June 26, 2025 of the local Kenesh of the aiyl aimak of Zhargylchak of the 1st convocation.
- for the Camp in the village. Chyrak, km 199+460 RHS (Section 2):
  - d. Resolution of the aiyl okmotu of the Jeti-Oguz aiyl aimak No. 130 dated April 29, 2025.
- for the Camp in the village. Chyrak, km 202+220 RHS (Section 2):
  - e. Resolution of the aiyl okmotu of the Jeti-Oguz aiyl aimak No. 202 dated July 21, 2025.
  - f. Resolution No. 40 of July 11, 2025 of the local Kenesh of the aiyl aimak of Jeti-Oguz of the XXIX convocation of the V-th session.
- 3. The Contractor has received approvals for Production site sites from the Issyk-Kul Regional Office of the Ministry of Natural Resources and Technology (IKRO MNRETS), namely:
- for the Camp in the village of Kichi-Jargylchak, km 150+610 LHS (Section 1):
  - a. Conclusion of the IKRO MNRETS No. 221–1/2025 dated August 26, 2025
- for the Camp in the village of Darkan, km 167+360 RHS (Section 1):
  - b. Conclusion of the IKRO MNRETS No. 183–1/2025 dated July 2, 2025
- for the Camp in the village of Chyrak, km 199+460 LHS (Section 2):

- c.Conclusion in the process of being received;
- for the Camp in the village. Chyrak, km 202+220 RHS (Section 2):
  - d. Conclusion of the IKRO MNRETS No. 206-1/2025 dated July 25, 2025;
- 4. Camp in the village of Kichi-Jargylchak, km 150+610 LHS (Section 1): the camp is temporary and constructed of modular prefabricated structures. Construction is complete. The camp site includes a dormitory for the Contractor's workers, a parking Section for cars, a security room, a transformer, temporary garbage bins, a septic tank, a toilet, and showers.



Figure 19: Aerial view of the Camp area in the village of Kichi-Jargylchak, km 150+610 LHS (Section 1).





Figure 20: Dormitory for the Contractor's workers of the camp in the village of Kichi-Jargylchak, km 150+610 LHS (Section 1).

5. Camp in the village of Ak-Terek, km 152+700 LHS (Section 1): the camp and office in the village of Ak-Terek are located on the territory of the Road Maintenance Department (RMD), which has all the necessary permits.

6. Existing buildings of the RMD were used to house the office. Residential quarters were constructed from modular prefabricated structures for the staff. Each room is equipped with a shower and a toilet with a drainage system into a septic tank. The camp also has a dormitory, a laboratory, a contractor's office, an equipment maintenance workshop, a parking Section for cars and trucks, a vehicle repair hangar, a security room, a transformer, temporary trash bins, a septic tank, a toilet, and showers.



Figure 21: Aerial view of the Camp area in the village of Ak-Terek, km 152+700 LHS (Section 1).



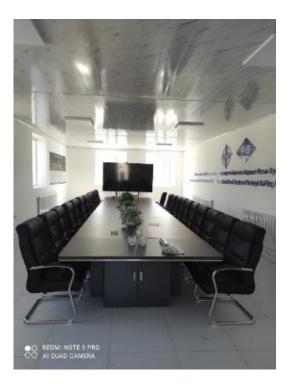


Figure 22: Campground and Conference Hall in the village of Ak-Terek, km 152+700 LHS (Section 1).





Figure 23: Cooking and eating area of the Camp in the village of Ak-Terek, km 152+700 LHS (Section 1).

7. Camp in the village of Darkan, km 167+360 RHS (Section 1): the camp territory includes: a laboratory, a dormitory for the Contractor's workers, a kitchen, a canteen, a parking Section for cars, a security room, a transformer, temporary garbage bins, a septic tank, a toilet, and showers.



Figure 24: Aerial view of the camp area in the village of Darkan, km 167+360 RHS (Section 1).

8. Camp in the village of Chyrak, km 199+460 LHS (Section 2): the camp territory includes: offices, a kitchen, a canteen, a dormitory for the Contractor's workers (each living room is equipped with a shower and a toilet with a water drainage system into a septic tank), a laboratory, a dormitory for the Contractor's workers, the Contractor's office, a workshop for

equipment maintenance, a parking Section for cars and trucks; a hangar for vehicle repairs, a security room, a transformer, temporary garbage bins, a septic tank, a toilet and showers.



Figure 25: Aerial view of the Camp area in the village of Chyrak, km 199+460 LHS (Section 2).



Figure 26: Aerial view of the Camp office premises in the village of Chyrak, km 199+460 LHS (Section 2).





Figure 27: Dormitory for the Contractor's workers of the camp in the village of Chyrak, km 199+460 LHS (Section 2).





Figure 28: Showers in the camp in the village of Chyrak, km 199+460 LHS (Section 2).

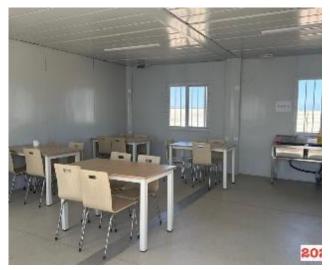




Figure 29: Cooking and eating block of the Camp in the village of Chyrak, km 199+460 LHS (Section 2).

9. Camp in the village of Chyrak, km 202+220 RHS (Section 2): the camp territory includes: a laboratory, a dormitory for the Contractor's workers, a kitchen, a canteen, a parking Section for cars, a security room, a transformer, temporary garbage bins, a septic tank, a toilet and showers.



Figure 30: Camp area in the village of Chyrak, km 202+220 substation (Section 2).





Figure 31: The cooking and eating area, as well as living quarters, of the Camp in the village of Chyrak, km 202+220 RHS (Section 2).

- 10. The sanitary condition of the territory of all four camps during the reporting month was assessed as satisfactory.
- 11. Drinking water for all camps is supplied in 18-liter bottles from nearby towns.

- 12. In all camps, wastewater is collected in permanent septic tanks. As the septic tank fills, the wastewater will be transported to a treatment facility for further treatment and disposal. During the reporting period, a wastewater removal contract has not been signed.
- 13. Garbage bins that meet sanitary requirements are located for the collection of solid municipal waste.
- 14. Solid waste from the Section 2 camps is transported to the Yntymak settlement landfill under Contract No. 10 dated August 14, 2025, with the municipal enterprise ME "Yntymak Service". A waste removal contract for the Section 1 camps is being finalized for signature (until end of September 2025).

## 2.4 Description of Any Changes to Project Design.

1. There were no design changes in the project within the reporting period.

## 2.5 Description of Any Changes to Agreed Construction Methods.

1. No changes were made in the agreed construction methods within the reporting period.

#### 3 ENVIRONMENTAL SAFEGUARD ACTIVITIES.

## 3.1 General Description of Environmental Safeguard Activities

- 1. The Contractor has appointed environmental protection specialists at each site: Isake Beisheev at Section 1, and Daniyar Kaiduev at Section 2, who are responsible for implementing environmental protection measures and monitoring compliance with requirements..
- 2. The Contractor developed the SSEMP, which was approved by the PIU of the Ministry of Transport and Communications on July 21, 2025 (Letter No. 14-9/67 dated July 21, 2025). The SSEMP covers two Sections, the placement of camps, quarries, spoil areas, and production sites.
- 3. During the current quarter, the Contractor processed permitting documentation, including approvals for water intake from rivers for dust suppression, permits for quarry development and waste disposal, and the siting of production sites while maintaining sanitary and environmental distances from residential areas and water sources. Additionally, the construction and operation of camps, equipped with infrastructure for accommodation, food, equipment storage, and waste management, were ensured.
- 4. Quarries and spoil areas: Inert material extraction sites have been approved by authorized bodies. Site surveys have been conducted, and work boundaries, access roads, and storage areas have been defined. Documentation for temporary and permanent spoil areas has been prepared, specifying reclamation methods to be implemented upon completion of the work.
- 5. Camps and production sites: The Contractor constructed camps, residential modules, offices, and bases in compliance with sanitary, environmental, and fire safety regulations. The locations were designed with consideration of distances to water bodies, residential areas, pastures, and agricultural land. The infrastructure includes fuel storage areas, equipment, kitchen facilities, sanitary facilities, and waste management systems.
- 6. Water Use and Water Protection Measures: For technical water supply, permits have been issued for water intake from rivers located along the construction route. Measures are in place to prevent turbidity and bank erosion at water intake points. Septic tanks are used for domestic wastewater.
- 7. Waste Management: Temporary storage areas for household and construction waste have been established, with subsequent transfer to licensed organization. Hazardous waste (oils, filters, batteries, etc.) is stored in specially equipped areas with a hard surface and cover.
- 8. Monitoring and Compliance Control: Specialists conduct regular inspections of construction sites, camps, production sites, quarries, and spoil areas. This includes:
- instrumental environmental monitoring (noise, vibration);
- maintaining environmental supervision logs;
- documenting measures to prevent and eliminate violations;
- interaction with the Engineer and government agencies.
- 9. During the reporting period, monthly monitoring of the project area was conducted by the Consultant's local environmental specialist. Visual monitoring was conducted at the road site, quarry, spoil areas, sampling points for measurements, as well as the contractor's production sites and camps.
- 10. To prevent the recurrence of violations and non-conformities, based on the results of environmental monitoring and environmental checklists, the CSC prepared a Corrective Action

Plan, which set out the measures to be implemented (see Appendix 2. Corrective action plan) and was submitted to the Contractor for implementation by official letter.

- 11. During the reporting period, there were no problems with dust on the road site, and no complaints about dust were received from residents of populated areas or road users.
- 12. During the reporting period, tree felling work was carried out on Section 1 and Section 2. Tree felling will continue in the next reporting period.
- 13. During the project's implementation, 5 386 trees were felled along the project road during the reporting period (2,646 pieces were cut down in section 1; 2,740 pieces were cut down in section 2.). Before the contractor's tree felling, a tree felling permit was obtained from the Issyk-Kul Regional Office of the Ministry of Natural Resources, Environment and Technical Supervision of the KR.

## 3.2 Biodiversity

- 1. During the reporting period, the Contractor developed and implemented the Biodiversity Management Plan (BMP), which forms an integral part of the SSEMP. In accordance with the BMP, all vegetation clearance activities are carried out in stages and under the supervision of the competent state authorities.
- 2. To enable construction works, the Contractor obtained an official Permit from the Issyk-Kul Regional Office of the Ministry of Natural Resources, Ecology and Technical Supervision of the Kyrgyz Republic for the removal of 5,572 trees along the project road. Prior to the commencement of clearance, a joint commission with representatives of the said Office conducted a visual inspection, individual counting and marking of all trees subject to removal. In addition, the commission verified the absence of nests of rare or endangered bird species. Based on the inspection results, no nesting of Red List species was identified.





Figure 32: The commission for counting and inspecting trees is at work.

- 3. By the end of the reporting period, tree cutting on Section 1 had been fully completed, while works on Section 2 were still in progress. Completion of the clearance is planned for October of the current year. All activities are being carried out in strict accordance with the BMP requirements, including limitation of vehicle movement, avoidance of encroachment into riparian zones, and maintenance of the Wildlife Observation and Mortality Register.
- 4. No cases of wildlife mortality or other biodiversity-related incidents were recorded during the reporting period. The Contractor further plans to implement vegetation restoration and

compensatory planting measures in line with the conditions of the Permit and the Biodiversity Management Plan.

## 3.3 Archaeological Objects of Historical and Cultural Heritage.

1. The project site is part of the Silk Road (Sections of Southern Issyk-Kul). Fourteen (14) historical and cultural heritage sites are in a 50-meter area from the road: (i) Five (5) burial grounds of the Early Iron Age and/or the Middle Ages, including 15 burial mounds; (ii) Seven (7) Modern Muslim cemeteries and sculptural monuments; and (iii) Two (2) ethnographic Muslim cemeteries (See the table below).

Table 9: Historical and cultural heritage sites located within 50 m from the road.

LOC	CATION	Distance from road	Description
Station points	UTM Coordinates	Distance from road	Description
142+920	42°10.822'N; 77°37.807'E	46 m south	Flat mound of stone and earth
143+245	42°11.004'N; 77°37.874'E	7 m south	A human femur and a fragment of a ceramic vessel
144+520	42°11.509'N; 77°38.251'E	20 m south	Flat mound of stone and earth
148+840	42°12.137'N; 77°40.667'E	35 m south	Modern Muslim Cemetery
153+020 - 153+120	42°13.576'N; 77°42.825'E	13 m south	Modern Muslim Cemetery
157+600	42° 5.547'N; 77°44.685'E	20 m south	A flat mound of stone and earth. One-room adobe building.
162+660 - 162+780	42°16.926'N; 77°47.882'E	24 m south	Modern Muslim Cemetery
165+290 - 165+330	42°17.583'N; 77°49.530'E	16 m north	Seven (7) mounds
166+840 -166+940	42°17.967'N; 77°50.551'E	30-73 m north	Ethnographic Muslim cemetery and burial mounds
172+600 - 178+680	42°19.215'N; 77°54.393'E	18 m north	Modern Muslim Cemetery
175+620 - 176+150	42°19.567'N; 77°56.711'E	16 m north	Modern Muslim Cemetery
183+130 -183+190	42°21.198'N; 78°1.400'E	9-24 m north	Ethnographic Muslim Cemetery
185+810	42°22.074'N; 78°2.934'E	10-46 m south	Sart-Ake and Tilekmat-Ake Memorial Monument
201+420 -201+540	42°27.249'N; 78°11.908'E	10-12 m south	Modern Muslim Cemetery

- 2. During the reporting period, the Contractor did not commence the mandatory archaeological investigations required under the Contract, the regulations of the Ministry of Culture of the Kyrgyz Republic, and the written Instruction issued by the Engineer on 12.09.2025 (Ref. KYR003\_CRBC\_54\_SM).
- 3. According to the Instruction, prior to starting any construction works within the 50-metre buffer zone of identified cultural heritage sites, the Contractor is obliged to:
- engage a qualified archaeological team;
- obtain an Open Sheet permit from the Ministry of Culture for excavation works:
- prepare and agree an excavation schedule;
- ensure archaeological supervision and follow the "stop-work protocol" in case of any findings.

4. As of the date of this Report, none of the above actions have been implemented by the Contractor. The Contractor plans to begin mandatory archaeological surveys on October 6, 2025.

## 3.4 Site Audits.

1. Table 10 shows on-site inspections/audits carried out by the Consultant and Contractor's environmental specialists at the project site during the reporting period.

Table 10: Inspections/Audits of the project area.

Nº	Date of Visit	Auditor name	Purpose of Inspection/Audit	Summary of any Significant Findings		
1	01.07.2025 – 03.07.2025	Abdygulov A. Syzonenko O. Akhmatova N. Beysheev I. Kaiduev D.	A visit to the K. Zh. Zhumayev Forestry Enterprise of the Forest Service under the Ministry of Emergency of the Kyrgyz Republic; Identification of sites for initial instrumental monitoring of environmental quality; An initial visit to construction sites, quarries, spoil areas, camps, and production sites. The visit was conducted jointly with the Contractor's environmental specialist.	<ol> <li>Meeting with the Director of the K. Zh. Zhumayev Forestry Enterprise to discuss the enterprise's ability to provide the project with the required quantity of seedlings. A discussion was also held on tree species with high survival rates in this region of the country and their care requirements.</li> <li>During the inspection, sites for initial instrumental environmental monitoring of environmental quality were identified, tables with the exact locations of the sites were compiled, and maps were presented. This information was reflected in the SSEMP.</li> <li>Introduction to the Contractor's team and those responsible for environmental issues;</li> <li>Visits to construction sites, quarries, spoil areas, camps, and production sites.</li> </ol>		
2	22.07.2025 - 25.07.2025	Akhmatova N. Beysheev I. Kaiduev D.	Visual inspection to ensure compliance with environmental requirements at construction sites, quarries, spoil areas, camps, and production sites. The visit was conducted jointly with the Contractor's environmental specialist.	<ol> <li>Ensure the availability of copies of the SSEMP at all camps and production sites.</li> <li>Organize instrumental monitoring of the quality of environmental components as soon as possible in accordance with the Environmental Monitoring Plan.</li> <li>Conclude contracts with specialized organizations for the removal and disposal of solid waste and wastewater.</li> <li>Survey the areas planned for use (quarries, spoil areas, production sites) and obtain an archaeological report on the presence or absence of historical and cultural heritage sites before their operation.</li> <li>For Section 1, provide a permit from the IKRO MNRETS for the placement of the camp in the village of Kichi-Jargylchak, km 150+610 LHS.</li> <li>For Section 2, expedite the receipt of permits for the waste dumps, provide information on the contours and their</li> </ol>		

			compliance with specific sites, tied to the project road grid.
3 23.08.202	Akhmatova N. Beysheev I. Kaiduev D.	Visual inspection to ensure compliance with environmental requirements at construction sites, quarries, spoil areas, camps, and production sites. The visit was conducted jointly with the Contractor's environmental specialist.	1. Conduct training for the Contractor's personnel on the SSEMP and provide copies of the SSEMP to all production areas and bases.  2. Ensure a full range of instrumental environmental monitoring in accordance with the Environmental Monitoring Plan.  3. Introduce dust suppression and waste logs.  4. Obtain official permits for water abstraction from surface water bodies.  5. Ensure separate storage of unusable soil and waste management materials.  6. Ensure implementation of the Waste Management Plan and all its sub-plans (Waste Management Plan, Biodiversity Management Plan).  7. Ensure compliance with the requirements of the Conclusions issued by the IKRO MNRETS No. 221-1/2025 dated August 26, 2025, and No. 183-1/2025 dated July 2, 2025, regarding the selection of sites for camps and production sites for asphalt concrete plants and concrete batching plants.  8. Ensure archaeological excavations of the HCHS in accordance with the archaeological report of the Ministry of Culture, Information, Sports, and Youth Policy No. 09/6/2829 dated April 28, 2023. The Contractor is obligated to engage a qualified local archaeologist to conduct excavations of historical and cultural heritage sites within 50 meters of the road.  9. Ensure the boundaries of temporary roads to the quarries.  10. Mark the boundaries of the spoil areas.

				<ul><li>11. Ensure the full implementation of the Engineer's Instruction No. KYR003 CRBC23_ SM dated August 5, 2025.</li><li>12. Ensure the timely drainage of surface water from the construction site.</li></ul>
4	10.09.2025 – 23.09.2025	Syzonenko O. Akhmatova N. Beisheev I. Kaiduev D.	Visual monitoring using Environmental Checklists to ensure environmental compliance at construction sites, quarries, spoil areas, camps, and production sites. The visit was conducted jointly with the Contractor's environmental specialist.v	<ol> <li>The Contractor for Section 1 and Section 2 received training on the SSEMP and compliance with the ADB Safeguards Policy Statement.</li> <li>Following the visual monitoring, the Contractor was provided with a Corrective Action Plan (Appendix 2) by official letter.</li> </ol>

- 2. The Consultant's environmental specialist is full-time and located on the construction site.
- 3. Findings observed during the Consultant's audit were communicated to the contractor for corrective actions. Twelve nonconformities were identified, 11 of which remain open/ongoing.
- 4. The status of non-compliance and corrective actions is also shown in Table 11 and Figure 32.
- 5. Table 12 summarizes the findings observed during the formal audits conducted by the Consultant and Contractor's environmental specialists and the status at the end of September 2025.

## 3.5 ADB Mission.

1. ADB mission will be carried out in October 2025.

## 3.6 Issues Tracking (Based on Non-Compliance Notices).

1 12 findings were identified, 11 of which remain open/ongoing. The Table 11, below provides a summary overview of Non-compliances and Corrective Actions.

Table 11: Overview of findings observed during July - September 2025.

Nº	Non-compliance	SSEMP Number and date	Best Practice Guidelines	Particular issues and	Contractor's actions	Results of	Status for July -
142	identified	of notification	Applicable	location	(specify)	Inspection	September 2025
1	Environmental management system	Section 6 SSEMP  IRD Ref.: September 16, 2025 / KYR003_CRBC_59_SM	ISO 14001 "Environmental Management System"; ADB Safeguard Policy Statement	Baseline environmental monitoring hasn`t been carried out.	A comprehensive baseline instrumental monitoring of environmental conditions shall be conducted, and the results shall be submitted to the Engineer for review and approval before the commencement of construction work.	-	Ongoing issue: Instrumental monitoring of noise and vibration levels was conducted in August 2025.  Instrumental monitoring of air and surface water quality will be carried out in October 2025.  This violation will be monitored during future inspections.
2	Environmental management system	Paragraph 92 of the SSEMP and Appendix 1 of the SSEMP; IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ISO 14001 "Environmental Management System"; ADB Safeguard Policy Statement	The SSEMP does not include a Road Safety Plan. Appendix 1, "Waste Management Plan," of the SSEMP should be supplemented with a clause prohibiting the burning of any waste within the Project area.	The SSEMP must be supplemented with the Plan mentioned above, after receiving its approval from the territorial directorate of the Main Directorate for Road Safety of the Ministry of Internal Affairs of the Kyrgyz Republic (MDRS of the Ministry of Internal Affairs of the Kyrgyz Republic).  Add a clause to Appendix 1 "Waste Management	-	The violations haven`t been rectified. These issues will be monitored during future audits.

Ne	Non-compliance	SSEMP Number and date	Best Practice Guidelines	Particular issues and	Contractor's actions	Results of	Status for July -
Nº	identified	of notification	Applicable	location	(specify)	Inspection	September 2025
					Plan" of the SSEMP to	•	-
					prevent the burning of any		
					waste on the Project site.		
	HCHS	Section 5 of the SSEMP;	ADB Safeguard Policy	Archaeological excavations	Provide archaeological	-	Ongoing issue:
			Statement;	of the objects of historical	excavations of the HCHS		The contractor
		IRD Ref.: September 12,		and cultural heritage	in accordance with the		plans to begin
		2025	Law on the Protection and	(HCHS) in the area where	archaeological report of		archaeological
		/KYR003_CRBC_54_SM	Use of Historical and	construction work is being	the Ministry of Culture,		excavations in
			Cultural Heritage.	carried out have not been	Information, Sports, and		October 2025.
			Conclusion of the Ministry	carried out, reports on the	Youth Policy No.		
			of Culture, Information,	results of archaeological	09/6/2829 dated April 28,		These issues will
			Sports, and Youth Policy	excavations in the Project	2023. The Contractor is		be monitored
			No. 09/6/2829 dated April	area have not been	obligated to:		during future
			28, 2023.	submitted, written approval	- engage a qualified local		audits.
				has not been provided	archaeologist to conduct		
				before the start of	excavations of historical		
				construction in the affected areas from the Ministry of	and cultural heritage sites within 50 meters of the		
				Culture, Information,	road;		
				Sports and Youth Policy	- conduct archaeological		
3				has not been received.	inspection of all areas		
				nas not been received.	planned for quarries,		
					production bases, asphalt		
					plants, crushing plants,		
					and other auxiliary		
					facilities;		
					- provide reports on the		
					results of archaeological		
					excavations in the Project		
					area;		
					- Provide written approval		
					from the Ministry of		
					Culture, Information,		
					Sports, and Youth Policy		
					before commencement of		
					construction on the		
					affected sites.		
	Permitting documentation	Section 5 of the SSEMP;	ADB Safeguard Policy	There is no permit from the	Avoid irrational use of	-	Ongoing issue: The
4			Statement.	Ministry of Natural	natural resources, namely		contractor re-
		IRD Ref.: October 6, 2025	Law of the Kyrgyz	Resources and Technical	mixing topsoil with		submitted
		/KYR003_CRBC_85_SM	Republic "On Subsoil" No.	Supervision of the Kyrgyz	unsuitable soil and/or		documents for

Nº	Non-compliance	SSEMP Number and date	Best Practice Guidelines	Particular issues and	Contractor's actions	Results of	Status for July -
Nº	identified	of notification	Applicable	location	(specify)	Inspection	September 2025
			49 of May 19, 2018	Republic for the extraction of materials from the quarries of Section 2, specifically the quarries at km 186+100, 191+500, 193+760, 199+660, 202+220, and 208+940, as well as the spoil areas.	building materials.		obtaining permits from the IKRO MNRETS. These issues will be monitored during future audits.
5	Vibration	Appendix 9 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement	A primary inspection for cracks in residential buildings located on the first line from the road was not carried out.	Create a commission of representatives of local government bodies, the Contractor, and the Consultant, and conduct a primary inspection for cracks in residential buildings on the first line from the road.	-	The violations haven't been rectified. These issues will be monitored during future audits.
6	Occupational health and safety	Appendix 3 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ISO 45001 "Occupational health and safety management system"; ADB Safeguard Policy Statement	Not all camps have medical offices and first aid kits.	Provide all Camps with medical offices and first aid kits	-	Ongoing issue: first aid kits have been purchased for Camp Section 1 (km 152+700) and Camp Section 2 (km 199+460), and medical offices are planned for the next quarter.  These violations will be monitored during future inspections.
7	Waste management	Appendix 1 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement; Law of the Kyrgyz Republic of August 15, 2023 No. 181 "On Production and Consumption Waste"	Signs of burning of household waste behind the Camp (km 199+460, LHS), which is contrary to national legislation;     No waste removal contract has been provided for Section 1, Waste Log is maintained.	Prevent the burning of any waste on the Project site. Ensure proper waste storage until it is transferred to organizations with which a waste removal contract has been concluded;     Provide a waste	<del>-</del>	Ongoing issue.  These issues will be monitored during future audits.

No	Non-compliance	SSEMP Number and date	Best Practice Guidelines	Particular issues and	Contractor's actions	Results of	Status for July -
Nº	identified	of notification	Applicable	location	(specify)	Inspection	September 2025
				Temporary waste storage facilities do not comply with SSEMP requirements. Waste is not separated.	removal contract for Section 1 and complete the Waste Log in a timely manner. 3. Ensure separate waste collection. Establish temporary waste storage facilities in accordance with the requirements of Appendix 1 of the SSEMP.	·	
8	Road site	Appendix 6 of the SSEMP; Appendix 10 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement.	1. Dust suppression is carried out continuously, but the Engineer is not provided with a weekly roadway moistening schedule.  2. Stagnant water in the road right-of-way (km 144+050, LHS, km 153+200 RHS);  3. Mixing topsoil with other soil, km 203-km 204 LHS.	1. In accordance with Appendix 6, "Dust Management Plan" of the SSEMP, the Contractor shall prepare a Roadway Moistening Schedule and submit it to the Engineer weekly, every Monday.  2. Ensure timely drainage of water from the construction site.  3. Avoid irrational use of natural resources, namely mixing topsoil with unsuitable soil and/or building materials.		Ongoing issue.  These issues will be monitored during future audits.
9	Quarries and Spoil Areas	Section 5 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement. Law of the Kyrgyz Republic "On Subsoil" No. 49 of May 19, 2018	1. Quarry km 199+660 (Section 2) does not have clearly defined boundaries. 2. Eight spoil areas of Section 2 (km 185+822, km 186+100, km 199+760, km 199+700, km 201+350, km 199+984) do not have clearly defined boundaries.	It is necessary to clearly mark the boundaries of all quarries and spoil areas in accordance with the permitting documents.	-	Ongoing issue.  These issues will be monitored during future audits.
10	Production Sites	Section 5 of the SSEMP;  IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement.	On the slope adjacent to Section 1 of the Production Plan, at km 167+580 of the RHS, erosion furrows, soil subsidence, and surface	Organize a drainage ditch to divert runoff along the base of the slope near Section 1 Production Plant, km 167+580 RHS,	-	Ongoing issue.  These issues will be monitored during future

Nº	Non-compliance identified	SSEMP Number and date of notification	Best Practice Guidelines Applicable	Particular issues and location	Contractor's actions (specify)	Results of Inspection	Status for July – September 2025
			••	layer cementation are observed. The hill may become unstable during heavy precipitation events, posing a threat to the production facility.	and install a barrier of stone materials along the weakest areas of the hill.	·	audits.
11	Camps	Appendices 3 and 4 SSEMP IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement.	1. Parking Sections for construction equipment and vehicles in Section 1 Camp (km 150+610, LHS) and Section 2 Camp (km 199+460, LHS) do not have a hard surface, which can lead to soil contamination with fuels and lubricants, and in rainy weather contributes to the removal of dirt onto the public road.  2. In the parking Section of Camp Section 2, km 199+460 LHS, small spots of fuel and lubricants are observed on the dirt surface.	1. Provide a solid foundation for parking for equipment and vehicles in the Camp, km 199+460, LHS.      2. Ensure the availability of absorbent materials for spill management and designate a responsible person for managing fuel and lubricant spills at each camp and production facility. Familiarize the responsible person with Appendix 4 of the SSEMP "Spill Control and Containment Plan."	-	Ongoing issue.  These issues will be monitored during future audits.
12	Biodiversity	Appendix 12 of the SSEMP; IRD Ref.: October 6, 2025 /KYR003_CRBC_85_SM	ADB Safeguard Policy Statement.	1. At km 202+200 LHS, damage to 4 trees was detected, and, in addition, the trunks of the first row of trees were covered with soil to a height of 30 cm or more.      2. The Log of observations and cases of fauna mortality is not maintained.	Inspect damaged trees at km 202+200 LHS, cut off damaged branches and move piles of soil away from the trees.     Timely completion of the Log of observations and cases of fauna mortality.	-	Ongoing issue.  These issues will be monitored during future audits.

# Status of NCRs raised to Project Area, September 2025



Figure 33: Status of Non-compliances and Corrective Actions.

**Table 12: Summary of Issues Tracking Activity for the Current Period.** 

Total Number of Issues for Project	12
Open/ongoing issues in this Reporting Period	11
Closed Issues in this Reporting Period	1
Percentage of Closed Issues	8 %

#### Overview and Description of the Problems Observed during the Current Period.

- 2 During the reporting period, the Contractor continued establishing the environmental and social management system across the Project. As the works are still at an early stage, several procedures are not yet fully implemented and require further refinement.
- 3 The key areas that would benefit from additional attention are:
- 4 **Finalisation of preliminary approvals and procedures:** Archaeological investigations and baseline environmental monitoring have been initiated but still require formal documentation and confirmation from the competent authorities. Obtain missing permits for quarries and spoil areas.
- 5 **Completion of thematic management plans:** In particular, the Traffic Safety Management Plan and Construction Vibration Management Plan remain under development.
- 6 **Strengthening control measures at production bases and temporary sites:** Additional improvements are needed in terms of boundary marking, surfacing of parking/storage areas and ensuring proper drainage and water management.
- 7 Progressive implementation of waste management and pollution prevention practices: Waste segregation should be further systematised, open burning must be fully excluded, and designated spill response personnel are to be confirmed.
- 8 **Development of regular reporting and record-keeping:** It is recommended to activate the use of observation logs, weekly activity reports and photo records to document progress and ensure traceability of compliance measures.

#### 3.7 Trends.

Although the reporting period covers the initial mobilisation phase, a generally positive trend can be observed in terms of organisational development. The Contractor has already appointed responsible environmental and OHS personnel, maintains communication with the Engineer and is gradually establishing the required procedures. At the same time, the transition from reactive responses to a more structured, preventive approach is still in progress. As construction activities expand, the workload on the environmental and social management system will naturally increase, therefore it is advisable to further strengthen it at this early stage while flexibility for improvements remains.

## 3.8 Unanticipated Environmental Impacts or Risks.

- 1 The risks were identified and covered in the SSEMP document.
- 2 There were no unanticipated environmental impacts or risks during the reporting period.

## 3.9 Summary of Appeals and Grievances

- 1 A Grievance Redress Group (GRG) within the framework of the Grievance Redress Mechanism (GRM) at the project site is established before the commencement of construction work. The GRG includes representatives of local government bodies, Contractor, Consultant, and PIU.
- 2 No appeals or grievances regarding environmental protection issues were registered during the reporting period.
- 3 The Semi-Annual Social Monitoring Report will give a more detailed analysis of public appeals.

#### 4 RESULTS OF ENVIRONMENTAL MONITORING.

- 1 Baseline instrumental environmental monitoring is a prerequisite for establishing reference values of key environmental parameters (air quality, water quality, noise and vibration levels) before the start of construction. In accordance with:
- Requirements of Appendix 1, ADB Safeguard Policy Statement (2009);
- Requirements of Section G, ESS1, ADB's Environmental and Social Framework (2024);
- National environmental regulations and the requirements of Section D (Table 125) of the EIA;
- SSEMP Section 6 "Instrumental Environmental Monitoring Plan";
- Requirements of clause 701.3 of the Technical Specifications.
- 2 The objectives of Baseline Instrumental Environmental Monitoring are to describe existing concentrations of pollutants before the start of construction work for subsequent control.

## 4.1 Overview of Instrumental Environmental Monitoring Conducted During the Current Period.

- 1 The sampling locations for instrumental monitoring of air quality, noise, and vibration levels were determined during a visit to the Project site from 1.07.2025 to 03.07.2025 by a commission consisting of:
- PIU MOTC KR Environmental Officer Asylbek Abdygulov;
- International Environmental Specialist of IRD ENGINEERING S.R. L. Olga Syzonenko;
- National Environmental Specialist of IRD ENGINEERING S.R.L. Nasiba Akhmetova;
- Environmental Specialist, Section 1 of China Road and Bridge Corporation Isake Beisheev;
- Environmental Specialist, Section 2 of China Road and Bridge Corporation Daniyar Kaiduev
- 2 The sampling locations for conducting instrumental studies on the quality of surface waters were selected in accordance with the EIA to ensure complete spatial coverage of all potentially water quality-sensitive receptors along the road section from km 141.6 to km 220, and taking into account the environmental and economic feasibility of measuring water quality indicators.
- 3 Based on the results of the site visit and the EIA, environmental protection specialists from China Road and Bridge Corporation developed an Instrumental Environmental Monitoring Plan as part of the SSEMP.
- 4 Instrumental studies of surface water and air quality are planned for October 2025.
- 5 The commercial laboratory of ProfiLab LLC carried out environmental instrumental monitoring of noise and vibration levels in August 2025.
- 6 Below are photographs of the conducted baseline instrumental monitoring of noise and vibration levels.

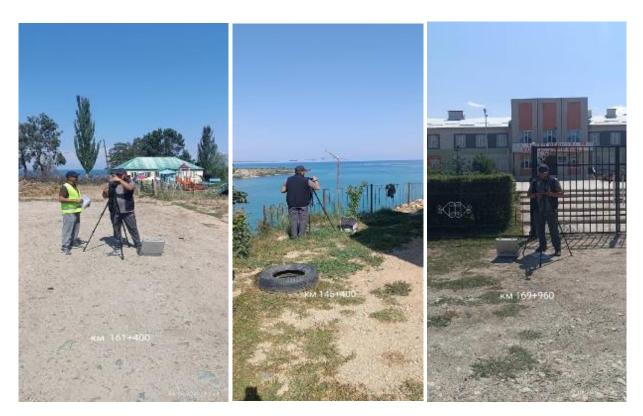


Figure 34: Instrumental monitoring of noise and vibration levels.

## 4.1.1 Noise and Vibration Impact Monitoring.

- 1 The specialists of the ProfiLab LLC laboratory implemented the noise and vibration instrumental tests.
- 2 Vibration and noise levels were measured at 22 points along the road in the vicinity of populated areas, as presented in the table below.

Table 13: Locations of air quality, noise and vibration level measurement points.

No.	Sensitive recipients impact	Address	Distance to roads (m)
1	Residential house	Chong-Jargylchak 900/2 Issyk-Kul st.	17
2	Chong-Jargylchak Mosque	Chong-Jargylchak 1 Jashtyk st.	48
3	Sports school	Kichi-Jargylchak	25
4	Hospital	Ak-Terek, 40 Baytik Kydyraliev st.	33
5	Jengish Mosque, children's garden	Jengish, 46 Kenenbay st.	25
6	Residential house	Jengish, 86 I. Baisanov st.	22
7	Darkhan Mosque	Darkhan, 126 Konokkazy Daniyarov st.	24
8	Abylay Satylganov educational school	Darkhan, 81 Konokkazy Daniyarov st.	46
9	Kudaibergen Saaliev educational school	Darkhan, 45 Konokkazy. Daniyarov st.	57
10	S. Sydykov educational school	Saruu, 63A Jeenbaev Aji st.	31
11	V. Lenin educational school	Kyzyl-Suu, 155 Manas st.	33
12	S. Abdrakmanov educational school	Kyzyl-Suu, 158 Manas st.	62
13	Kut Bilim Isyk-Kul educational and training Complex »	Kyzyl-Suu, 72/1 Manas st.	37
14	Sanjyra Museum	Orgochor, 1 Togolok-Moldo st.	18
15	Tilekmat Mosque	Tilekmat, 46 Salyk Torgoev st.	20
16	Residential house	Tilekmat, 34 Salyk Torgoev st	44
17	Residential house	Jele-Dobo, 1 Cossack Usekov st.	19
18	Residential house	Kytai, 1 Tekebaev st.	20
19	Residential house	Baltabay, 6 Abdyldaev Osmon st	49
20	Residential house	Konkino, 2 Allapaev Abalbek st.	11
21	Residential house	Karakol, 1/1 Toktogul st.	23
22	Bosogo Guests House	Karakol, 218A. Toktogul st.	20

- 3 Noise and vibration measurements were carried out with the Ecophysics 110A digital vibrometer calibrated according to the standard. Three measurements were taken at each point, with an interval of approximately 2 hours between measurements.
- 4 Noise measurements were carried out by GOST 23337-2014 "Noise. Methods for measuring noise in the residential area and the premises of residential and public buildings." GOST 20444-2014 "Traffic flows. Methods for determining the noise characteristic."
- 5 Vibration measurements were carried out following GOST 31319 "Vibration. Measurement and evaluation of human exposure to whole-body vibration."
- 6 The results of instrumental noise measurements showed that at the time of the measurements, noise levels in populated areas ranged from 49 dBA to 67 dBA. The average values of equivalent noise levels do not exceed sanitary standards (Table 3 of Appendix 14 of Resolution No. 201 of the Government of the Kyrgyz Republic dated April 11, 2016).
- 7 The results of instrumental vibration measurements showed that at the time of measurement, vibration levels were in settlements ranging from 65 dBA to 97 dBA, which don't exceed sanitary standards (GOST 12.1.001 standard).

8	The detailed noise and vibration impact monitoring results are presented in Appendix 4, as well as in Tables 14 and 15.

Table 14: Results of noise level monitoring.

Indicator	Units								Mor	nitorii	ng da	ta by	samp	ling l	locati	ons								Standard noise level, dBA
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	
Equivalent noise level, Leq 22 - 23/08/2025	dBA	66	58	60	63	56	63	59	67	52	51	55	53	54	66	62	50	49	53	56	58	60	60	65
Equivalent noise level, Leq 22 – 24/08/2025	dBA	61	58	56	63	58	64	60	64	56	65	55	52	60	58	55	65	55	65	58	61	58	66	65
Equivalent noise level, Leq 23 – 24/08/2025	dBA	58	56	60	63	58	66	62	65	58	66	56	55	60	63	57	67	59	63	56	63	62	61	65
Average Leq	dBA	62	57	59	63	57	64	60	65	55	61	55	53	58	62	58	61	54	60	57	61	60	62	65

Table 15: Results of vibration level monitoring.

Indicator	Units		monitoring data by sampling locations															Standard vibration						
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	level, dB
Equivalent noise vibration, Leq 22 - 23/08/2025	dB	86	86	93	95	92	95	91	93	92	86	85	92	87	91	93	93	86	88	86	80	74	81	108
Equivalent noise vibration, Leq 22 - 24/08/2025	dB	91	93	93	86	90	86	82	79	80	80	79	81	86	65	76	71	78	75	78	67	78	79	108
Equivalent noise vibration, Leq 23 - 24/08/2025	dB	89	91	90	91	97	84	84	87	84	80	79	81	77	85	80	78	79	81	80	82	88	90	108
Average Leq	dB	87	90	92	91	93	88	86	86	85	82	81	85	83	80	83	81	81	81	81	76	80	83	

Noise and vibration measurement protocols are presented in Appendix 4.

## 4.1.2 Surface Water Quality Monitoring.

- 1 Sampling and testing of surface water quality will carry out in October 2025 by specialists from the laboratory of chemical-analytical studies of the Department of Disease Prevention and the State Sanitary and Epidemiological Surveillance under the Ministry of Health of the Kyrgyz Republic.
- 2 In the next quarter, measurements of water transparency, pH, biochemical oxygen demand (BOD5), oil product content, and suspended solids will be taken at 16 points (see Table below).

Table 16: Locations of sampling points from surface water bodies.

Nº	Place	Description places	UTM coor	dinates	
1	River Kichi-Jargylchak	50 m up by the current from the bridge, left shore	42.20787	77.68498	
2	River Kichi-Jargylchak	45 m down by the current from the bridge	42.20817	77.68435	
3	River Ak-Terek	50 m up by the current from the bridge, right shore concrete fencing	42.22310	77.71325	
4	River Ak-Terek	40 m below by the current from the bridge, under the concrete fencing on the right bank	42.224069	77.71153	
5	River Juuku, Darkhan village	60 m up by the current from the bridge, left shore (in the garden near the house)	42.31101	77.88013	
6	River Juuku, Darkhan village	40 m below by the current from the bridge, across the yard near the house	42.31123	77.87931	
7	River Juuku, Saruu village	60 m up by the current from the bridge, left shore	42.31746	77.90234	
8	River Juuku, Saruu village	40 m below by the current from the bridge, under concrete fencing channel (water after the bridge entirely goes into the irrigation channel)	42.31950	77.9022	
9	River Chong-Kyzyl- Suu	60 m up by the current from the bridge, left shore	42.35018	78.0266	
10	River Chong-Kyzyl- Suu	40 m below by the current from the bridge, under the concrete fence (at the end of the vegetable garden, first Houses from the road)	42.352199	78.019894	
11	Issyk-Kul Lake	District confluences rivers Kichi-Jargylchak to the Issyk-Kul Lake	42.208512	77.683884	
12	Issyk-Kul Lake	The closest to the road zone on Issyk-Kul Lake	42.189691	77.644888	
13	Issyk-Kul Lake	The district confluences the rivers Ak-Terek and Issyk-Kul Lake	42.225823	77.709615	
14	Issyk-Kul Lake	The district confluences the Juuku River in Issyk-Kul Lake	42.362268	77.866073	
15	Issyk-Kul Lake	Zone kernels biosphere reserve around Darkhan village	42.302401	77807944	
16	Issyk-Kul Lake	Support the quality of water in Issyk-Kul Lake	42.37125	77.61691	

- 3 Laboratory tests were carried out under the "Rules for the Protection of Surface Waters of the Kyrgyz Republic" of the Government of the Kyrgyz Republic dated March 14, 2016, No. 128, and the hygienic standards "Maximum allowable concentration limits (MAC) for chemicals in the water of water bodies for household-drinking and domestic-utility needs of the public", dated April 11, 2016, No. 201.
- 4 The results and protocols of the baseline instrumental monitoring of surface water quality will be presented in the following quarterly environmental monitoring report.

#### 4.1.3 Air Quality Monitoring.

- 1 Sampling and analysis of atmospheric air quality is planned for October 2025 and will be conducted by specialists from the laboratory of chemical-analytical studies of the Department of Disease Prevention and the State Sanitary and Epidemiological Surveillance under the Ministry of Health of the Kyrgyz Republic.
- 2 Instrumental air quality studies will include analysis for the presence of the following pollutants:
- nitrogen dioxide (NO<sub>x</sub>);
- sulfur dioxide (SO<sub>2</sub>);
- carbon monoxide (CO);
- particulate matter (PM<sub>10</sub>, PM<sub>2.5</sub>).
- 3 Samples will be collected at 22 points along the road in the vicinity of the settlements presented in Table 13.
- 4 The results and protocols of the baseline instrumental air quality monitoring will be presented in the next Quarterly Environmental Monitoring Report.

#### 4.2 Trends.

- 1 It should be noted that the baseline instrumental monitoring of surface water and ambient air quality has not yet been conducted, although this activity is mandatory prior to the commencement of main construction works. At the same time, the Contractor has already carried out noise and vibration measurements, demonstrating progress in implementing the monitoring programme.
- 2 Given the extensive workload and the number of concurrent organisational tasks during the mobilisation phase, the Contractor has committed to completing the full baseline instrumental environmental monitoring in October 2025. This will provide reference data for future comparison and ensure compliance with the SSEMP's requirements.

#### 4.3 Material Resources Utilisation.

- 1 China Road and Bridge Corporation uses water for dust suppression from previously agreed-upon and approved water sources (Kichi-Jargylchak River, km 149+680; Ak-Terek River, km 152+760; Dzhuku River, Darkhan Village, km 170+220; Dzhuku River, Saruu Village, km 172+200; Chon Kyzyl-Suu River, km 181+980).
- 2 Approval for water intake was received from the State Institution under the Water Resources Service under the Ministry of Water Resources, Agriculture and Processing Industry of the Kyrgyz Republic, the Issyk-Kul Main Water Management Directorate, dated September 10, 2025, No. 01 11/133.
- 3 The use of electricity, water and other materials is not subject to monitoring in the SSEMP.

#### 4.4 Waste Management.

- 1 The Contractor has developed a Waste Management Plan under the SSEMP, which describes the waste management activities for the project.
- 2 During the reporting period, the Contractor continued establishing the waste management system at production bases and workers' camps. At this stage, the main focus has been on the collection of solid and liquid domestic waste generated from workers' daily activities. Waste is collected in sealed containers with lids, while liquid waste is accumulated in watertight septic tanks in line with sanitary requirements.
- 3 The Contractor has indicated that the removal and disposal of waste and wastewater will be performed by specialised municipal service providers ("Karakol-Tazalyk", "Kyzyl-Suu-Tazalyk" "Yntymak", and local water utilities). Currently, only one Agreement has been signed with MP "Yntymak Service" No. 10, dated August 14, 2025. The remaining Agreements are at the signing stage.
- 4 However, the waste accounting system has not yet been fully implemented: a waste register has not been established, and reporting is currently carried out in a simplified format. There were also isolated cases of excessive soil waste generation due to waterlogging of embankment materials. The Contractor has confirmed that in the next period these materials will be stored separately and reused where feasible.
- 5 Overall, the waste management system is in the process of being established. The Contractor is advised to finalise the service agreements, introduce proper record-keeping, and progressively implement all requirements of the Waste Management Plan under the SSEMP.

## 4.5 Health and Safety.

## 4.5.1 Community Health and Safety.

- 1 The Contractor hired full-time:
  - Section 1 Safety officer Omurbek Zhamanakov, and
  - Section 2 Safety officer Mairambek Kurmanaliev.
- 2 No permanent medical staff is involved in the project; in case of emergency or whether medical treatment is required, the local medical facility in the vicinity of the camps have been contracted to provide healthcare services.
- 3 There were no road traffic accidents during the reporting period.
- The Consultant's road safety specialist, Ruslanbek Kasymov, regularly visits of the project road and construction sites to ensure safety measures were followed. Urgent actions were closed immediately, and actions requiring longer to fulfill were formally communicated to the Contractor.
- 5 The contractor carries out maintenance work on the road section from km 141.6 to km 220.

#### 4.5.2 Worker Safety and Health.

1 The Contractor prepared and submitted "The Occupational Health and Safety Plan in July 2025.

- 2 During the reporting period, there were no accidents, incidents that led to problems with employee health and safety, or incidents related to downtime.
- 3 The Contractor conducts initial safety briefings and mandatory training.
- 4 All workers at the facilities are provided with a complete set of PPE (overalls, helmets, boots, welding shields, aprons, gloves, headphones, and safety glasses), but some neglect to wear the entire set.
- 5 The HSE engineer daily checks critical safety equipment (fire extinguishers, sandboxes, other fire-fighting equipment, first aid kits, etc.).





Figure 35: Equipped fire safety boards.

6 Project workers undergo regular medical examinations, including testing for HIV and other related diseases.

#### 4.6 Training.

- 1 During the Project site visit, which took place from September 8, 2025, to September 25, 2025, the Consultant conducted two training sessions:
  - Date: September 22, 2025, Time: 2:00 PM 4:00 PM, Location: Section 1, Camp/Office, km 152+700 LHS;
  - Date: September 23, 2025, Time: 10:00 AM 12:00 PM, Location: Section 2, Camp/Office, km 199+460 LHS.
- 2 The training consisted of two parts:
  - ADB's Safeguard Policy Statement, ADB's Environmental and Social Framework, and the Site-Specific Environmental Management Plan (SSEMP) presented by Olga Syzonenko;
  - National environmental legislation requirements related to the Project speaker Nasiba Akhmatova.
- 3 Topics raised during the training:

- ADB's Safeguard Policy Statement (2009) and ADB's Environmental and Social Framework (2024)
- ADB's Environmental and Social Standards;
- Site-specific Environmental and Social Management Plan (SSEMP);
- Issues related to baseline environmental instrumental monitoring;
- Issues related to archaeological excavations;
- Inspection of houses in the first line of settlements along the road regarding cracks and damage (to prevent further complaints about damage to houses from construction vibration);
- Waste management;
- Occupational health and safety;
- Topsoil removal in the coastal zones of Issyk-Kul and near historical and cultural heritage sites (HCHS);
- Preparation of an Environmental Passport for the Project, Maximum Permissible Emissions (MPE), and Maximum Permissible Quantity of Waste (MPW);
- Timely payment of regulatory fees for environmental pollution and surface water use;
- Consequences of non-compliance/violation of the provisions of the Site-Specific Environmental and Social Management Plan (SSEMP) and regulatory payment deadlines.
- 4 Below are photographs from the training sessions. The protocols are provided in the Appendix 3.





Figure 36: Training, Section 1, Camp/Office, km 152+700 LHS.





Figure 37: Training, Section 2, Camp/Office, km 199+460 LHS.

- 5 Conducting these trainings at the early stage of the project is of particular importance. During the mobilisation and commencement phase, the practical understanding of environmental and social requirements is established, and responsibilities among project participants are defined. The trainings enabled the Contractor's staff to gain a clear understanding of the Site-Specific Environmental and Social Management Plan (SSEMP), the ADB Safeguard Policy, and national environmental regulations. This forms a strong foundation for a systematic approach to risk management, prevention of non-compliance, and ensuring adherence to both Bank and national requirements from the very beginning of project implementation.
- 6 The Contractor's occupational health and safety (OHS) training program consists of the following components:
  - Initial orientation to familiarize all workers and staff with OHS is conducted within the first week of their assignment.
  - Short daily thematic briefings (toolbox talks);
  - Periodic OHS training sessions are held at least once every six months.
  - · Monthly regular meetings to discuss OHS matters.
  - Regular inspections to test, maintain, and inspect safety equipment, such as fire shields, fire extinguishers, barriers, work platforms, winches, ladders, lighting, road signs, personal protective equipment (PPE), and other safety devices.
- 7 Below are photos of daily technical briefings.







Figure 38: Conducting daily thematic briefings (toolbox talks).

- 8 Daily thematic briefings (toolbox talks) are essential for maintaining awareness of risks, fostering a safety culture, and quickly communicating important information directly on the job site. Short, focused discussions help prevent injuries, adapt to changes in technology and processes, and provide documented evidence of compliance and audit preparation.
- 9 They promote employee engagement, experience sharing, and near-miss problem identification, which reduces downtime and incident response costs.

#### 5 SSEMP FUNCTIONING.

#### 5.1 SSEMP Review.

- 1 The SSEMP was reviewed and approved in July 2025. The document outlines the measures proposed under the Project to prevent, minimize, or mitigate adverse environmental impacts arising from the Project.
- 2 The SSEMP is the Contractor's (China Road & Bridge Corporation CRBC) primary working document for environmental management and monitoring during the construction phase. The plan was developed based on the Environmental Impact Assessment (EIA), the ADB Safeguards Policy, and the laws and regulations of the Kyrgyz Republic.

## 5.1.1 Structure and scope.

- 1 The SSEMP has a clearly defined structure, including:
- Introduction (site information, purpose, and structure of the Plan);
- Compliance obligations (recognition of laws, compliance with requirements);
- Organization and personnel;
- Communication and reporting;
- Environmental monitoring: Environmental Management and Monitoring Plan.
- 2 The SSEMP is supplemented by 13 separate plans (sub-plans), which detail the necessary mitigation measures aimed at minimizing negative impacts. These include: Waste Management Plan, Occupational Health and Safety Plan, Biodiversity Management Plan, Asbestos-Containing Materials (ACM) Management Plan, Construction Vibration Management Plan, and others.

#### 5.1.2 Organization and Responsibility.

- 1 The Contractor (CRBC) has undertaken to perform the Works in accordance with Kyrgyz legislation and the SSEMP. Key personnel have been appointed: Project Manager (Tou Ailun), Environmental Specialists (Beisheev Isake and Daniyar Kaiduev), and Safety Officers (Omurbek Dzhamanakov and Mairambek Kurmanaliev).
- 2 The responsibilities of the Environmental Specialists include ensuring compliance with the SSEMP, implementing daily environmental measures, conducting weekly audits, conducting surveys (e.g., vibration), maintaining a daily Field Diary, and coordinating monitoring with an accredited laboratory.

#### 5.1.3 Environmental Management Plan.

- 1 The Environmental Management Plan (Table 5.1 of the SSEMP) describes mitigation measures for various types of work and potential impacts, indicating locations, timing, and responsible persons.
- 2 **Air Quality and Noise:** Air and noise monitoring is provided in highly sensitive areas. Measures include wetting the road surface every two hours, speed restrictions, suspension of work during strong winds, and a ban on construction activities near sensitive areas (hospitals, schools, mosques) from 10:00 PM to 6:00 AM.
- Water Resources: The discharge of materials, wastewater, and chemicals onto the soil is prohibited. Watertight concrete septic tanks are provided in camps and production sites. Work near watercourses should be carried out during low-flow periods to minimize impacts (siltation).

- 4 **Erosion and Reclamation:** To prevent erosion, slope reinforcement with gabions, storm drain lining, and immediate protection of long-term topsoil piles with fast-growing vegetation are provided.
- 5 **Cultural Heritage:** Work will be carried out strictly in accordance with the "Project for the Protection Zones of Historical and Cultural Heritage Sites." If artifacts are discovered, work must be stopped immediately, and the archaeologist and relevant authorities must be informed.
- 6 **Tree Felling:** Trees felled must be replaced by new trees at a ratio of 1 to 2.

## 5.1.4 Environmental Monitoring Plan (EMP).

- 1 Instrumental monitoring (water quality, air quality, noise, and vibration) will be conducted by an accredited laboratory.
- 2 **Water Monitoring:** Samples will be taken at 16 points on rivers (50 m upstream and 40 m downstream from the bridges) and in Lake Issyk-Kul to determine suspended solids and total petroleum hydrocarbons.
- 3 **Noise/Vibration/Air Monitoring:** Measurements will be taken at 22 points, including areas near residential buildings, mosques, schools, and hospitals, which are sensitive receptors. Vibration monitoring will include remote alerting for exceeding the maximum vibration velocity (ppv) threshold.
- 4 **Frequency:** Baseline monitoring (before the commencement of construction work). During construction, measurements will be taken quarterly in the work zones, as well as unscheduled at the request of the population or authorities.
- 5 **Environmental monitoring:** Conducted by the Engineer's environmental specialist every week (visual inspection) and by the Engineer's international environmental specialist quarterly, using an Environmental Checklist.

#### 5.1.5 Sub-plans of the SSEMP.

1 The SSEMP for the Issyk-Kul Ring Road Improvement Project is supplemented by 13 individual sub-plans, which aim to mitigate specific environmental and social impacts in more detail. A brief description of these sub-plans is provided below.

#### Waste Management Plan (WMP).

- 1 The purpose of the WMP is to manage all types of waste generated during construction, including debris, demolition waste, and residues, as well as small amounts of hazardous materials (such as fuels, chemicals, and contaminated soil). The plan's key principles include waste minimization, maximum reuse (e.g., old asphalt, scrap metal, pallets), and a strict prohibition on the disposal of pollutants on land or in water.
- Waste is classified as non-hazardous (waste rock, old asphalt, concrete) and hazardous (Classes I, II, and III). Hazardous Class III waste includes sludge, wastewater, and asbestos. Waste collection areas (bins, temporary waste pits) must have a concrete base and be protected from precipitation.
- 3 Specialized local companies dispose of solid municipal and liquid waste via approved landfills or treatment facilities under a signed contract. The environmental specialist is responsible for implementing the WMP, training workers, monitoring, and maintaining the Waste Log.

## Occupational Health and Safety Plan (OHS).

1 The plan is designed to ensure the health, safety, and hygiene of personnel at the construction site. The contractor appoints qualified personnel to coordinate occupational health and safety issues and ensures the availability of a dedicated medical center. The

- contractor is obligated to enter into agreements with medical facilities in Karakol and the Jeti-Oguz district to provide emergency medical care.
- 2 Key safety measures include providing workers with personal protective equipment (PPE) (helmets, goggles, earmuffs), first aid kits, fire extinguishers, and fire shields. Personnel also undergo safety training.
- 3 To increase awareness, monthly briefings are held to discuss specific cases, complaints, and suggestions for improving the construction process. The Contractor will also take necessary measures to protect the health of personnel, including information on sexually transmitted diseases (STDs/HIV/AIDS), with mandatory observance of confidentiality of records.

## **Camp Development and Management Plan.**

- 1 This plan regulates the safe and environmentally friendly operation of construction camps and production facilities. Camps include residential and office space, a dining hall, a medical center, a laundry, a workshop, and equipment maintenance areas.
- 2 Wastewater is collected in special waterproof concrete septic tanks and periodically removed by sewage trucks. Direct discharge of sanitary and wastewater onto the ground is prohibited.
- 3 To prevent spills, fuel and chemical storage areas must be located on a waterproof foundation with a roof, fenced, and removed from water sources. A vehicle wash area at the camp exit must be equipped with a three-section dirt and oil trap. The contractor will provide waste bins and maintain a waste log.

## Spill Control and Containment Plan.

- 1 This plan serves as a simplified guide for controlling and containing potential spills of fuels, lubricants, and bitumen, which is particularly important for the Issyk-Kul Biosphere Reserve. The primary measures focus on strict monitoring of refueling and the technical condition of all equipment.
- 2 To prevent fuel leaks when refueling large equipment (excavators, rollers), the use of special containers installed under the fuel tank is mandatory. All flammable substances must be stored in watertight and serviceable tanks in fenced areas.
- If a spill is detected, work is immediately suspended. The Contractor immediately begins collecting contaminated material in sealed containers and notifies the Engineer/ABR GRU. In the event of a spill of large quantities of hazardous materials, the local Sanitary and Epidemiological Surveillance Services are notified. The construction office must have up-to-date contact information for all emergency services.

## Traffic Management Plan (TMP).

- The plan is aimed at ensuring the safety and unimpeded access of vehicles and pedestrians within the work area. The Contractor undertakes to prepare a Traffic Management Plan (TMP) and submit it for approval. The whole plan will be forwarded to the Consultant after receiving approval from the Main Directorate for Road Safety of the Ministry of Internal Affairs of the Kyrgyz Republic.
- 2 The TMP will include a description of traffic control equipment, signage, the location of signalers, and traffic control devices during non-working/night periods. Before the commencement of construction, road signs, barriers, and temporary barriers must be installed to create a visual barrier between the work area and traffic.
- 3 The Contractor undertakes to construct the site at half the width to ensure uninterrupted traffic flow. Additionally, before commencing work, transportation routes and access roads to the construction site must be discussed and approved by local authorities.

#### **Dust Management Plan (DMP).**

- 1 Dust generated by work with sand, crushed stone, soil, and old asphalt is a significant source of pollution, impacting populations, crop yields, and water quality. Mitigation measures include speed limits in populated areas and the mandatory use of protective covers (tarpaulins) on trucks transporting materials that generate dust.
- 2 The primary measure is regular irrigation of unpaved roads with sprinklers. Around sensitive sites (schools, hospitals), water should be sprayed every two hours during dry and windy conditions. Construction work is suspended during strong winds if dust levels are high.
- 3 Sanitary Protection Zones (500 m for asphalt concrete plants) are established for production sites. An environmental specialist maintains a daily Dust Suppression Log.

## Asbestos-Containing Materials (ACM) Management Plan.

1 The plan contains detailed instructions for dealing with the discovery of ACM, which is essential because asbestos is classified as a Class III hazardous waste. Procedures include immediately stopping work within a 5-meter radius, wetting the ACM with water to prevent dust formation, using personal protective equipment (disposable coveralls, respirators with a filter), double-packing in plastic bags, placing in sealed containers (metal drums marked "contains asbestos"), and disposal at a landfill in a specially prepared cell covered with a clay layer of at least 250 mm.

#### **Construction Logistics Plan.**

- 1 The plan is designed to organize the storage of materials, spare parts, and equipment while ensuring environmental safety. Storage areas for fuels and lubricants must have a concrete foundation and be protected from precipitation to prevent contamination. Similar requirements apply to temporary storage areas for used oil and unusable parts.
- 2 Maintenance and refueling of equipment at the construction site must be carried out only at designated sites (gas stations). Oil changes are prohibited within the quarry; these must be performed at the main camp.
- 3 All storage areas for flammable materials must be equipped with fire extinguishers or fire shields. The contractor shall contract with specialized local companies for the removal of used oil, tires, and other unusable equipment.

#### Vibration Management Plan.

- 1 The plan aims to reduce and control vibration exposure from construction equipment, particularly near sensitive sites (residential buildings, schools, and hospitals). Baseline vibration levels in buildings along the road, before the commencement of work, were less than 1 mm/s.
- 2 To ensure monitoring, a qualified consultant will be hired to continuously monitor the maximum vibration velocity (ppv) in vibration-sensitive buildings closest to the road.
- 3 The selected equipment must provide remote notification of threshold exceedances via the GPRS network. This allows for prompt restriction or termination of work to prevent cosmetic or structural damage to buildings. Monitoring is conducted before construction (baseline monitoring) and every two months in the work areas.

#### Water Supply, Wastewater, and Drainage Management Plan.

1 The plan regulates the construction and repair of artificial structures (bridges, culverts) and aims to protect water resources, including eight major rivers and Lake Issyk-Kul. Due to seasonal watercourse flows, bridge and culvert reconstruction work must coincide with periods of low or no flow (from mid-May to mid-September).

- To prevent pollution, the discharge of wastewater into water bodies is prohibited, and fuels and chemicals must be stored in safe, watertight containers. The number of culverts has been increased from 148 to 175 to ensure adequate drainage. New culverts must have a sufficient diameter and slope to prevent blockages and ensure natural water flow. To prevent erosion, the spillways will be lined with rock riprap.
- Water quality monitoring (oils, fats, suspended solids) will be conducted by an accredited laboratory upstream and downstream of the work site (up to 50 m), if water is present in the watercourses. The contractor will also maintain close contact with farmers to determine the timing of work that will not disrupt irrigation.

#### Stakeholder Engagement Plan.

- 1 The plan ensures effective communication and cooperation between the Contractor, local communities, and local governments. For this purpose, the Contractor will designate a local specialist/contact person who will be permanently present at the work sites.
- 2 This specialist will maintain contact with the local population, inform them of the work schedule, and potential utility outages (including power lines and water lines). Upon request, they will also communicate with the Contractor's responsible officials.
- 3 The contact person will also facilitate the work of the Grievance Redress Group (GRG) within the Grievance Redress Mechanism (GRM). Discussion and approval of transport routes and access roads to the construction site with local government representatives is also envisaged to minimize conflicts.

#### Tree Planting Management Plan (TPM).

- 1 The TPM aims to minimize tree loss and implement compensatory measures to mitigate the impact of this loss. The primary impact is the inevitable felling of trees.
- 2 Compensatory planting is adopted at a ratio of 1:2 (two new trees for every one felled). Planting should be carried out after completion of technical work, during the most favorable seasons: spring (March to April) and/or fall (September to October). Saplings should be reserved from local forestry.
- 3 When constructing embankments, the maximum height of fill near tree trunks should not exceed 30 cm, and organic soil should be used for the fill. The survival rate of newly planted trees, as well as the regularity of irrigation, is constantly monitored and controlled.

#### **Biodiversity Management Plan (BMP).**

- 1 The BMP is designed to minimize impacts on flora and fauna. The project's zone of interest (100 m) is classified as predominantly anthropogenically modified environments (arable land, settlements, pastures), but also includes forested lands and permanent water bodies.
- 2 Measures include introductory training on biodiversity, minimizing disturbance to the land surface, especially in coastal zones, limiting noise during the day, waste management to control pests, and enforcing speed limits. To prevent uncontrolled clearing, a Permit System for Disturbance of Vegetation Integrity has been introduced.

#### 6 GOOD PRACTICE AND OPPORTUNITY FOR IMPROVEMENT.

#### 6.1 Good practice.

- 1 The best practice for improving the SSEMP is to constantly update it (at least once a year) and adapt all sub-plans to the project's changing circumstances and conditions. The main directions are outlined below.
- 2 Clear structure and division of responsibilities:
- Appointment of dedicated personnel (environmental and social specialists) at project sites;
- Regular monitoring and reporting on environmental and social aspects.
- 3 Staff training and public awareness:
- Regular training sessions for staff on environmental protection, occupational safety, and traffic rules:
- Public awareness campaigns about project impacts and available grievance mechanisms for the local population.
- 4 Preventive control measures:
- Development and implementation of SSEMP sub-plans;
- Conducting environmental inspections and corrective actions in case of identified non-conformities.
- 5 Stakeholder engagement:
- Public consultations with local communities, ensuring open communication and addressing social concerns;
- Collaboration with government bodies, such as local forestry departments, for monitoring compensatory planting efforts.

## 6.2 Opportunities for Improvement.

- 1 The Contractor is responsible for ensuring compliance with environmental standards, occupational health, and workplace safety, and it is in their interest to continually improve their environmental and social system. Key areas for improvement are listed below.
- 2 Strengthening monitoring and reporting:
- Implementation of digital tools to automate the monitoring of environmental and social indicators;
- Regular updates of online registers for grievances, incidents, and inspection results;
- Quarterly inspections using environmental checklists and preparation of Corrective Action Plans based on the findings.
- 3 Optimizing the training program:
- Expanding the content of training sessions to address identified deficiencies;
- Engaging external specialists to conduct training events.
- 4 Enhancing community engagement:

- Regular surveys and consultations with local communities to identify and resolve potential issues;
- Expanding programs to support local initiatives, such as access to clean water or road improvements.
- 5 Improving the effectiveness of compensatory measures:
- Selecting suitable tree species resilient to future climatic conditions (changes in ombroregime and continentality) to ensure high survival rates and long-term ecosystem stability;
- Developing long-term care plans for compensatory trees considering climatic and local characteristics, involving specialized experts;
- Involvement of specialists for diagnostics and prevention of tree diseases on an ongoing basis during the defect liability period.
- 6 These measures will help strengthen the system's resilience and efficiency, minimize environmental impact, and improve social engagement with the local population.

#### 7 SUMMARY AND RECOMMENDATIONS

## 7.1 Summary

1 This Conclusions section presents a summary of the key achievements, challenges, and current status of environmental and social management of the Project during the reporting period (July–September 2025), based on the results of monitoring and audit.

### 7.1.1 Institutional Development and Compliance with ADB Policy

- 1 The Project, categorized as Category A due to its location within the Issyk-Kul Biosphere Reserve, its proximity to the Ala-Too core zone, and the presence of 14 historical and cultural heritage sites (HCHS) within 50 meters of the road, is in the early stages of mobilization and preparatory work.
- 2 The Contractor (CRBC) has successfully developed and implemented a Site-Specific Environmental Management Plan (SSEMP), which the PIU formally approved on 21 July 2025.
- 3 Qualified environmental protection and safety (EHS) personnel have been appointed for both Sections and are present on-site daily, facilitating timely responses to risks.

## 7.1.2 Work Execution and Permitting Documentation

- 1 During the reporting period, active work was underway to establish five residential camps and two production sites (asphalt concrete plant, concrete batching plant).
- 2 The locations of the production sites (km 167+360 and km 202+220) comply with the requirements of the SSEMP, as they are situated at least 500 m from residential buildings and at least 50 m from water sources.
- 3 Approval was successfully obtained for water abstraction from five rivers for dust suppression purposes. Additionally, permits were issued for the felling of trees and for the development of 10 of the 19 planned guarries.
- 4 As part of the OHS, regular staff training is conducted, including an introductory briefing on the SMP and ADB's Safeguards Policy.

## 7.1.3 Key Issues and Non-Conformities

- 1 Despite positive progress, 12 non-conformities were recorded, of which 11 remain open at the end of the reporting period (a closure rate of only 8%).
- 2 The most critical issues include:
- 3 Archaeological Surveys: Contract requirements and the Engineer's written instructions were violated, as mandatory archaeological excavations within the 50-meter zone of 14 HCHSs were not conducted. Scheduled for October 2025.
- 4 Environmental Monitoring: Mandatory baseline instrumental monitoring of surface water and atmospheric air quality was not completed during the reporting period and was postponed until October 2025, which is a violation of ADB requirements and national regulations requiring it to be conducted before the start of main construction work.
- 5 Documentation and Waste Management: Several mandatory documents are missing, including the Environmental Passport, Waste Log, and Dust Suppression Log.
- 6 Infrastructure: The parking Sections for equipment in the Section 1 (km 150+610) and Section 2 (km 199+460) camps are unpaved, posing a risk of soil contamination from fuel

- and lubricants, as well as the transfer of dirt onto the road. Cases of mixing topsoil with unsuitable soil were also identified.
- 7 Overall, an organizational framework for environmental management was established during the reporting period. Still, significant strengthening of systemic control is required, particularly concerning completing permitting documentation, fulfilling archaeological obligations, and implementing all procedures stipulated by the SSEMP to ensure full compliance with ADB standards and Kyrgyz legislation.
- 8 No environmental complaints or traffic accidents were registered.

#### 7.2 Recommendations

1 To further enhance the effectiveness of the environmental and social management of the Project and address the identified non-compliances, the Contractor is advised to prioritize the following actions:

#### 7.2.1 Critical Outstanding Procedures (Before the Start of Main Works)

- 1 It is imperative to promptly complete the following activities, which are mandatory conditions for the start of main construction:
- 2 Archaeological Surveys (HCHS): Mandatory archaeological surveys within a 50-meter zone of 14 Historical and Cultural Heritage Sites (HCHS), as determined by the Ministry of Culture, must be expedited. The Contractor is required to engage a qualified archaeological team, obtain an open sheet permit from the Ministry of Culture to conduct excavations, and provide the Engineer with excavation reports and written approval before commencing construction on the affected areas.
- 3 Baseline Instrumental Monitoring: Given that instrumental studies of surface water and atmospheric air quality have been postponed until October 2025, it is necessary to ensure that comprehensive baseline monitoring is conducted immediately before the commencement of construction work. Records of previously conducted noise and vibration measurements should also be provided to the Engineer.
- 4 Initial Inspection of Residential Buildings: A committee (including local authorities, the Contractor, and the Consultant) must be established, and an initial inspection of residential buildings located near the road must be conducted to identify cracks and damage. This measure is preventative to prevent further complaints about damage from construction vibration.

#### 7.2.2 Permitting and Internal Documentation

- 1 It is necessary to complete the process of obtaining all necessary documentation and standardize internal document flow:
- 2 Permitting Documentation (Sections 1 and 2): Accelerate the process of obtaining missing permits from the Ministry of Natural Resources and Transport of the Kyrgyz Republic for the extraction of materials from the quarries of Section 2 (including km 186+100, 191+500, 193+760, 199+660, 202+220, 208+940) and for the use of the unsuitable soil dumps of Section 2.
- 3 Traffic Management Plan (TMP): Supplement the SSEMP with a TMP, having first agreed upon it with the Main Directorate for Road Safety of the Ministry of Internal Affairs of the Kyrgyz Republic.
- 4 Internal Reporting: Implement a standardized format for the Waste Log, Dust Suppression Log, and Wildlife Observation and Mortality Log. Internal document flow should also be

standardized by implementing a standardized format for logs, weekly photo reports, and registries of completed activities.

#### 7.2.3 Infrastructure Improvement and Waste Management

- 1 Discrepancies related to the development of production bases and camps should be addressed:
- 2 Camp Infrastructure: Provide a designated surface parking area for equipment and vehicles in Section 1 Camp (km 150+610) and Section 2 Camp (km 199+460, LHS) to prevent fuel and lubricant contamination of the soil and the transfer of dirt onto public roads. Adsorbent materials should be purchased and made available to contain fuel and lubricant spills.
- 3 Waste Management: Strictly prevent the burning of any waste on the Project site, as this is contrary to national legislation. Waste removal contracts for Section 1 Camps must be completed.
- 4 Topsoil and Soil Management: Prevent the mixing of topsoil with unsuitable soil or construction materials.

## 7.2.4 Risk Management and Long-Term Improvements

- 1 To improve the sustainability and effectiveness of the Project management system, it is recommended to:
- 2 Strengthen Control and Coordination: Enhance the coordination of environmental activities at the project management level, providing administrative support to ensure the timely receipt of approvals and resources. Gradually implement a preventative approach, focusing on the prevention of violations (e.g., through briefings and the appointment of responsible duty officers).
- 3 Erosion Control: Create a drainage ditch to divert runoff along the base of the unstable slope adjacent to Section 1 Production Base (km 167+580 RHS) and install a rock barrier along the weakest areas. Ensure timely drainage of surface and irrigation water away from the construction site.
- 4 Biodiversity and Landscaping: Inspect damaged trees at km 202+200 LHS, prune damaged branches, and remove topsoil that has buried tree trunks by more than 30 cm. As part of compensatory measures, long-term care plans for compensatory trees should be developed, taking into account climatic and local conditions.
- 5 Monitoring and Reporting: Implement digital tools to automate the monitoring of environmental and social indicators. Conduct quarterly inspections using environmental checklists and prepare a Corrective Action Plan based on them.