



Kemin-Balykchy OHTL

Environmental & Social Impact Assessment (ESIA):

Volume V – Land Acquisition and Livelihood Restoration Framework

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Abbreviations

AH	Affected Households
CoM	Cabinet of Ministers
CC	Civil Code
EBRD	European Bank for Reconstruction and Development
E&S	Environmental and Social
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
GIP	Good International Practice
GoU	Government of Kyrgyzstan
GRM	Grievance Redress Mechanism
SG	Sanitary Gap
IFI	International Financial Institutions
PJSC	Public Joint Stock Company
LARF	Land Acquisition and Livelihood Restoration Framework
LC	Land Code
LRP	Livelihood Restoration Plan
LLC	Limited Liability Company
MoM	Minutes of Meeting
NEGK	National Electric Grids of Kyrgyzstan
OHTL	Overhead Transmission Line
O&M	Operations and Maintenance
PAP	Project Affected Person
PR	Performance Requirement
RAP	Resettlement Action Plan
RoW	Right of Way
SEP	Stakeholder Engagement Plan
K-B	Kemin-Balykchy
SS	Substation
SwS	Switching Station

1 Introduction

1.1 Overview and Project background

The European Bank for Reconstruction and Development (“EBRD”) is considering providing a sovereign loan to the Public Joint-Stock Company National Electric Grid of Kyrgyz Republic (“PJSC NEGK”) to finance the construction of a 500 kV overhead transmission line (OHTL) in Kyrgyz Republic between the Kemin substation in Chui region and the new Balykchy in Issyk-Kul region (see Figure 1).

The Project's primary purpose is to facilitate the evacuation of electricity generated by renewable energy power plants under development to the national power grid. Implementing the Project will also significantly improve the transmission networks’ reliability, efficiency, stability, quality and security of the electricity supply.

NEGK will be responsible for construction and implementation of the Project. EBRD has appointed Juru Ltd. as the Environmental and Social Impact Assessment (ESIA) Consultant for the Project following EBRD Environmental and Social Policy 2019 (ESP 2019) and supporting Performance Requirements (PRs), and specifically PR5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement.

Juru is currently undertaking the ESIA study. Initial categorizations have been identified under EBRD and Kyrgyz law. The Project is considered to require a full Environmental Impact Assessment under the national legislation and Category A under EBRD requirements.

This Land Acquisition and Livelihood Restoration Framework (“LARF”) has been prepared as part of the ESIA study, on behalf of NEGK to guide and implement resettlement planning. The aim of this LARF is to identify resettlement principles and organizational arrangements and to provide a guide to the provision of livelihood restoration, should any impacts be identified in the future.

At the time of writing this LARF the Project final design and development schedule are still being finalised. However, based on preliminary design no structures or assets are expected to be impacted by the Project. **A Livelihood Restoration Plan (LRP) will need to be prepared based on this LARF once the final design has been completed¹.**

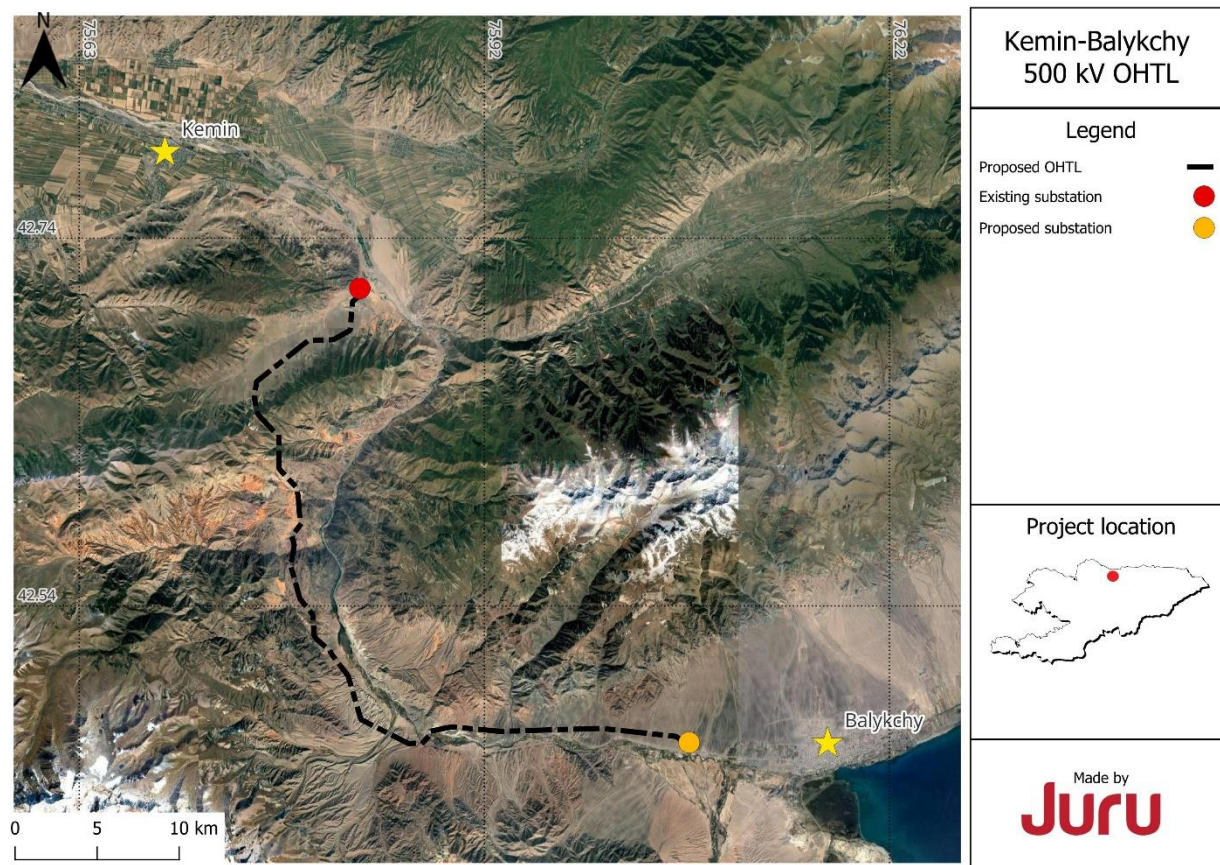
This LARF is organised by chapters that cover:

- Project description including the different components of the Project;
- Project impacts and alternatives identified;
- Description of the process for preparing and approving resettlement and livelihood restoration plans;
- Legal framework and international requirements;

¹ The requirement to prepare a LRP and discharge obligations prior to site mobilisation has been included in the Project Environmental and Social Action Plan (ESAP) which will form a condition of the financing process.

- Description of the methodology for carrying out census, asset inventory, socio-economic surveys that will be undertaken;
- Socioeconomic Baseline;
- Identification of affected people and assets;
- Key compensation and assistance principles;
- Eligibility;
- Entitlements;
- Description of the compensation and assistance
- LRP Implementation schedule;
- Livelihood restoration activities;
- Organizational arrangements;
- Time frame;
- Disclosure of information and consultations;
- Grievance mechanism;
- Implementation costs;
- Monitoring and reporting.

Figure 1: Project location



1.2 Project description

The Project involves the construction of a 500 kV overhead transmission line (OHTL) to improve the high-voltage power transmission network in the Kyrgyz Republic. This new infrastructure will connect the existing Kemin Substation to the new Balykchy Substation, covering approximately 52.9 km and traversing both mountainous and valley terrain.

The primary components of the K-B OHTL Project are:

- Approximately 50 km of 500 kV OHTL between the Kemin substation (SS) (Chui region) and new Balykchy SS (Issuk-Kul region);
- Construction of the new Balykchy SS.

Related activities in support of the OHTL works will include:

- end-user works at the Kemin SS (within a newly expanded area to be constructed under separate project);
- establish a 78 m ROW under the OHTL (including provision of any related livelihood compensation);
- upgrade existing track or new access track suitable to provide access to the OHTL ROW from the existing road that runs parallel to the OHTL;
- access road to the new Balykchy SS.

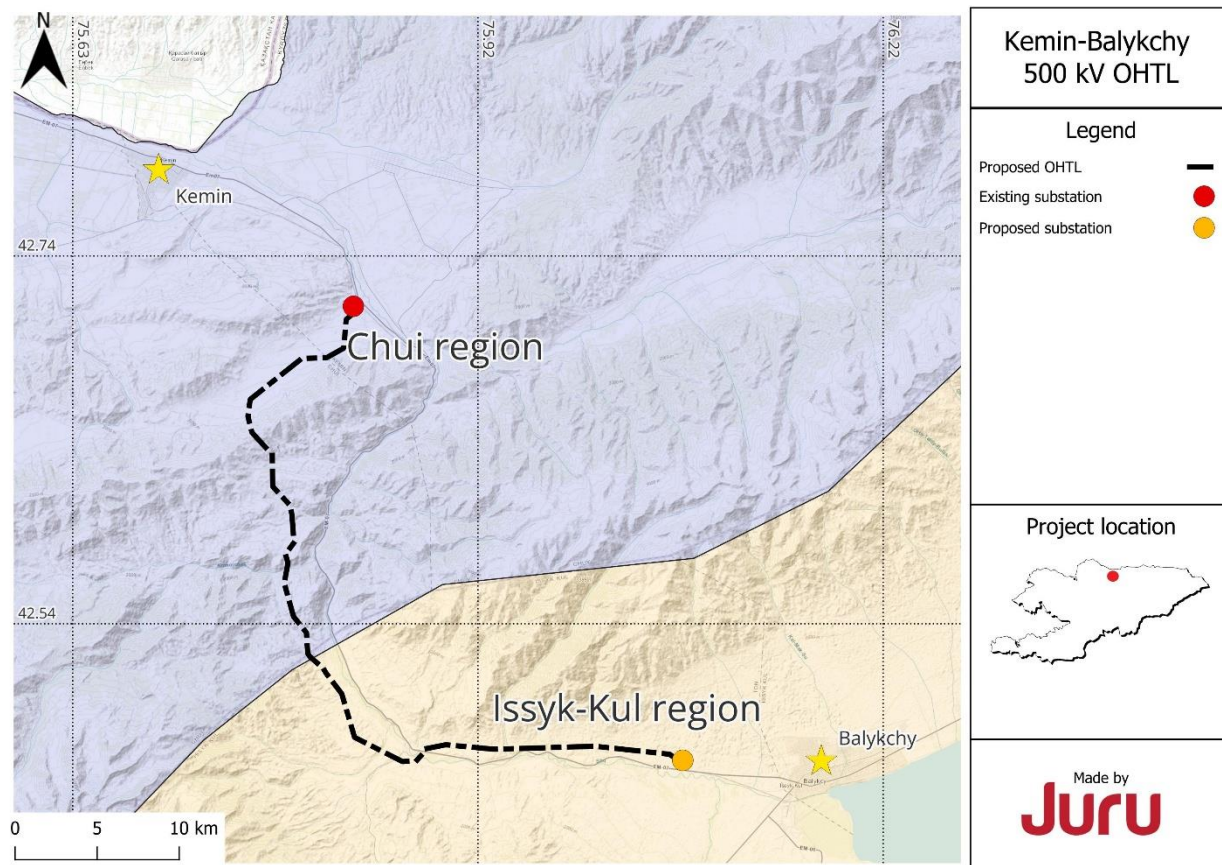
The routing of the line in the wider region is illustrated in Figure 2.

The Kemin substation (SS) is an existing 220/500 kV substation, which will be expanded to include a new 500 kV bay within its current boundaries. This expansion is necessary to facilitate the connection of the new OHTL. Implementation of this project will be carried out by PJSC NEGK.

A new Balykchy 220/500 kV substation will also be constructed on a 14.3-hectare site near Balykchy city. This substation is a key element of the project and is required to receive power from the Kemin-Balykchy 500 kV OHTL. The substation will be constructed under the project's scope, and upon completion, its operation and maintenance will be handled by PJSC NEGK.

The Kemin SS expansion and the construction of the Balykchy SS are both integral components of this project. No additional associated facilities have been identified at this stage.

Figure 2: Overview of the location of the Project in the wider region (source: Juru)

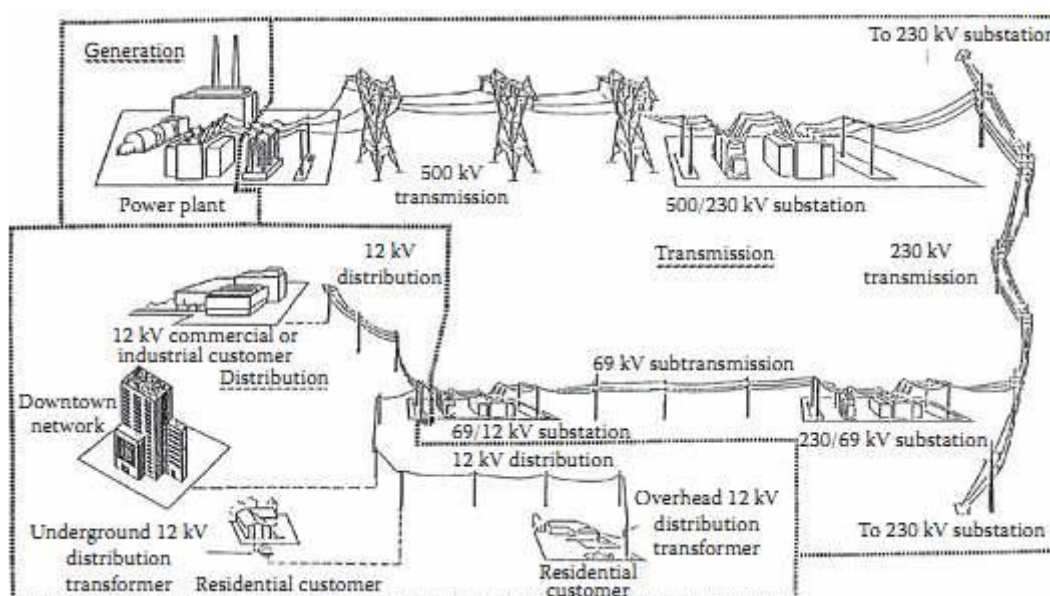


1.3 Project components

1.3.1 Main components

The main components of an OHTL are the towers, foundations, insulators, conductors (wires), and earth wire. In addition to the permanent tower footprints, the Project requires a defined Right of Way (ROW) corridor for both operational and construction purposes. Figure 3 shows the key features of a typical energy transmission and distribution system.

Figure 3: Concept of electric energy transmission²



The total ROW width for the OHTL is 78 m, comprising 39 m on each side from the centre line. During the construction phase, this area will be temporarily cleared to ensure the safe installation of towers and conductors, construction access, and stringing activities.

Within this corridor, a "sanitary gap" of 30 m on each side of the outermost conductors must be maintained in accordance with national health and safety regulations. The presence of trees, structures, or other physical obstructions is strictly prohibited within the sanitary gap. These restrictions are required for safety and maintenance purposes and will remain in place throughout the operational life of the OHTL.

The OHTL will operate at 500 kV and is designed to handle either single or double circuit configurations with two or three phases. The line includes the installation of approximately 130-170 towers, depending on final routing and design. A summary of the key characteristics of the OHTL is provided in Table 1.

Table 1: Summary of OHTL characteristics

Feature	Description
Voltage	500 kV
Approximate length of OHTL	52.9 km
Length of new access road	Estimated between 50km to 70km (worst case estimate)
Tower height	24.3 to 38 m

² http://www.industrial-electronics.com/elec_pwr_3e_9.html

Typical Span / Maximum span	250 m to 350 m / 1000m
Optical Ground Wire (OPGW)	Yes

1.3.2 Tower Types and Foundations

Towers will be either self-supporting steel lattice or guyed towers (**Error! Reference source not found.**), depending on terrain and technical requirements:

- Suspension towers (intermediate towers) — used to support the conductors on straight line stretches (type R2+5).
- Angle or deviation towers — used at points where the route changes directions (types U1 or U2k).
- H-guyed towers - can be used in areas with limited space or in challenging locations, such as mountainous regions (types PB4 or PB5).
- Terminal towers — used at substation entry.

Each tower requires foundations with a footprint between ~37.5–353.28 m² (*Table 2*). Self-supporting towers are preferred in agricultural areas to minimize land use interference, while guyed towers, though requiring more space, may be used in non-productive land areas.

Figure 4: Components of an OHTL (source: Juru)

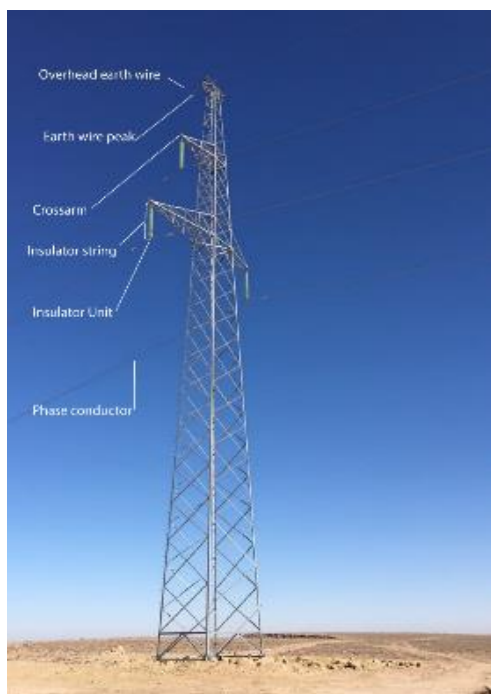


Figure 5: Self-supporting 500 kV R2+5 Steel Lattice Suspension Tower (single circuit) (source: Juru K-B FS)

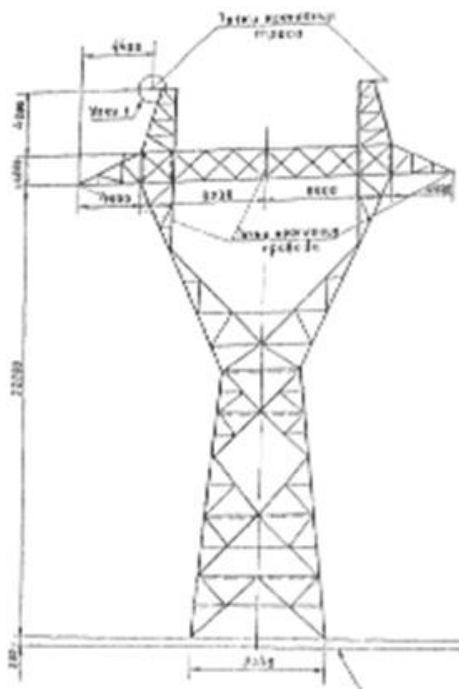


Figure 6: 500 kV H-Guyed PB4 suspension (intermediate) tower (single circuit) (source: Juru K-B FS)

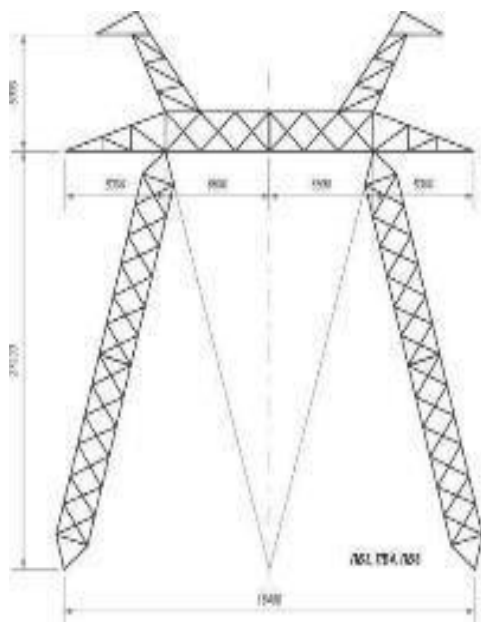


Figure 7: U2k 500 kV angle tower (single circuit) (source: Juru K-B FS)

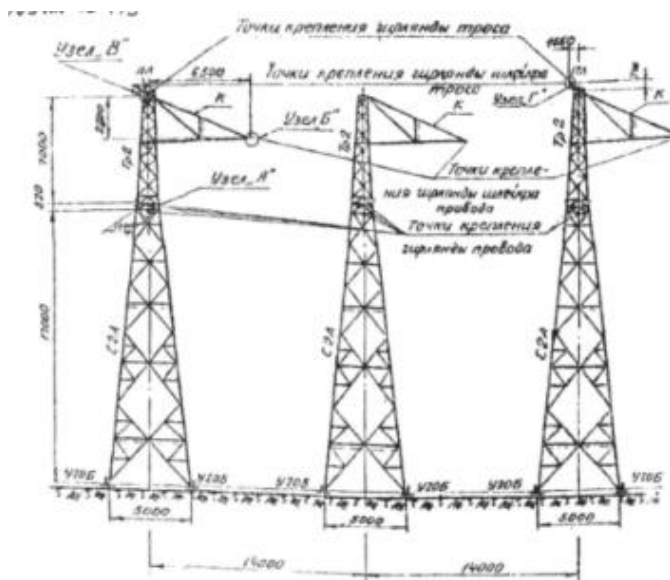


Table 2: Foundation characteristics (source: Juru and NEGK)

Tower Requirement	R2+5 500 kV (self-supporting)	PB 4 500kV (guyed)	U2k 500 kV (angle)
Number of foundations	Four foundation columns at ground level	Two foundation columns at ground level	Four foundation columns at ground level
Average footprint	9.048m x 6.272m (56.75 m ²) (the footprint is defined as the outer of the foundation columns at ground level).	18.4m x 19.2m (353.28 m ²) (total) (b) (the footprint is defined as the outer border of the guy wires).	7.5m x 5m (37.5 m ²) (the footprint is defined as the outer of the foundation columns at ground level).
Foundation type	Actual size and type will depend on the type of tower and the sub-soil conditions. The main types are "piled", "pad and chimney", and "anchors". Angle towers will require more extensive foundations.		
Notes	Area inside the footprint can return to natural	The area inside the footprint can be used,	Area inside the footprint can return to natural

Tower Requirement	R2+5 500 kV (self-supporting)	PB 4 500kV (guyed)	U2k 500 kV (angle)
	habitat, but not easily used for grazing.	although may restrict the movement of machinery – not preferred in agricultural areas due to guy wires.	habitat, but not easily used for grazing.

Foundation designs will depend on soil conditions and include piled, pad-and-chimney, or anchor types. All foundations will be grounded to reduce risks of electrical fault and lightning.

1.3.3 Conductors, Insulators, and Safety Elements

The line will use Aluminium Conductor Steel Reinforced (ACSR) type, often in bundled configurations. Clearance heights and sag will comply with national safety standards, considering temperature, ice loading, and wind.

- Insulators made of glass, ceramic, or composite will isolate the live wires from the tower structure.
- Shield wires (earth wires) and OPGW will provide lightning protection and enable system control and communication.
- Bird protection measures (e.g., bird guards) will be applied where necessary to reduce avian electrocution risk.

1.3.4 Balykchy SS

A new 220 kV/500 kV substation will be constructed on a 14.3-hectare plot located ~ 6.5 km west of Balykchy city and 1.5 km from Kok-Moynok-2. The Balykchy SS will include an operational area of approximately 492 m x 290 m. The site lies within an arid to semi-arid desert landscape with sparse shrub and grass cover.

Scope includes:

- Site levelling and civil works;
- Installation of transformers and electrical systems;
- Establishment of permanent operational infrastructure;
- Land acquisition;
- Connection for the new 500 kV OHTL; and
- New access from the EM11 highway of approximately one kilometre.

Construction materials will be sourced locally where possible. All civil and electrical works will follow good international practice standards for safety, noise, and dust control.

The main component of the new Balykchy SS is summarised in Table 3.

Table 3. Main components of Balykchy SS

No.	Equipment	Description and Key Specifications
1	Autotransformers	500/220/35 kV, 167 MVA, 7 pcs (1 reserve), oil-immersed, OLTC, forced oil circulation, air cooling
2	Shunt Reactors	500 kV, 120 MVar, 3 pcs, oil-filled, air cooling
3	Circuit Breakers and Disconnectors	500 and 220 kV, various types, including with one or two earthing blades
4	Instrument Transformers	Current and voltage transformers (CTs and VTs) with support structures for 500 and 220 kV
5	Relay Protection and Automation (RPA)	Main and backup protection cabinets for transformers and lines (500/220 kV), breaker control cabinets, bus differential protection, central alarm cabinet
6	Automated Metering System (AMI)	Includes three-phase meters, data acquisition and transmission devices, power supply, and communication interface
7	Telemetry System	Measuring transducers, switching and power supply equipment
8	Communication System	High-frequency and optical communication cabinets, fixed/vehicle radio stations, antennas
9	Insulator Strings and Bus Conductors	Sets of suspension and tension insulator strings, 500/220 kV bus conductors
10	Supporting Structures and Surge Protection	Support insulators, bay/busbar gantries, surge arresters

1.3.5 End user works at Kemin SS

The existing 220 kV/500 kV Kemin Substation began operations in 2017. The new works include installation of a 500 kV transformer and associated civil and electrical infrastructure within the current substation footprint.

Key notes:

- No major site preparation required;
- Equipment delivery via existing access;
- No new raw material sourcing or on-site batching expected; and
- All works contained within secured, fenced area.

1.3.6 Access Roads and Right of Way

Gravel tracks (Figure 8) and the existing main road (EM11) will act as the main access route to the OHTL ROW. Gravel access roads were established during the construction of the existing 500kV and

220 kV lines in the area and these will be used for easier transportation of crews and materials to access the proposed route ROW. Only 3 km of new unpaved access road is expected to be required.

The OHTL will be accessed via:

- Existing roads, including gravel tracks established for other nearby 220 kV and 500 kV lines; and
- Up to 70 km of new access roads, primarily unpaved and constructed to avoid key environmental and social receptors.

Temporary tracks within the right-of-way (ROW) will be used during construction, with efforts to minimize disturbance to biodiversity and agricultural land.

Figure 8: Examples of access road conditions near Balykchy



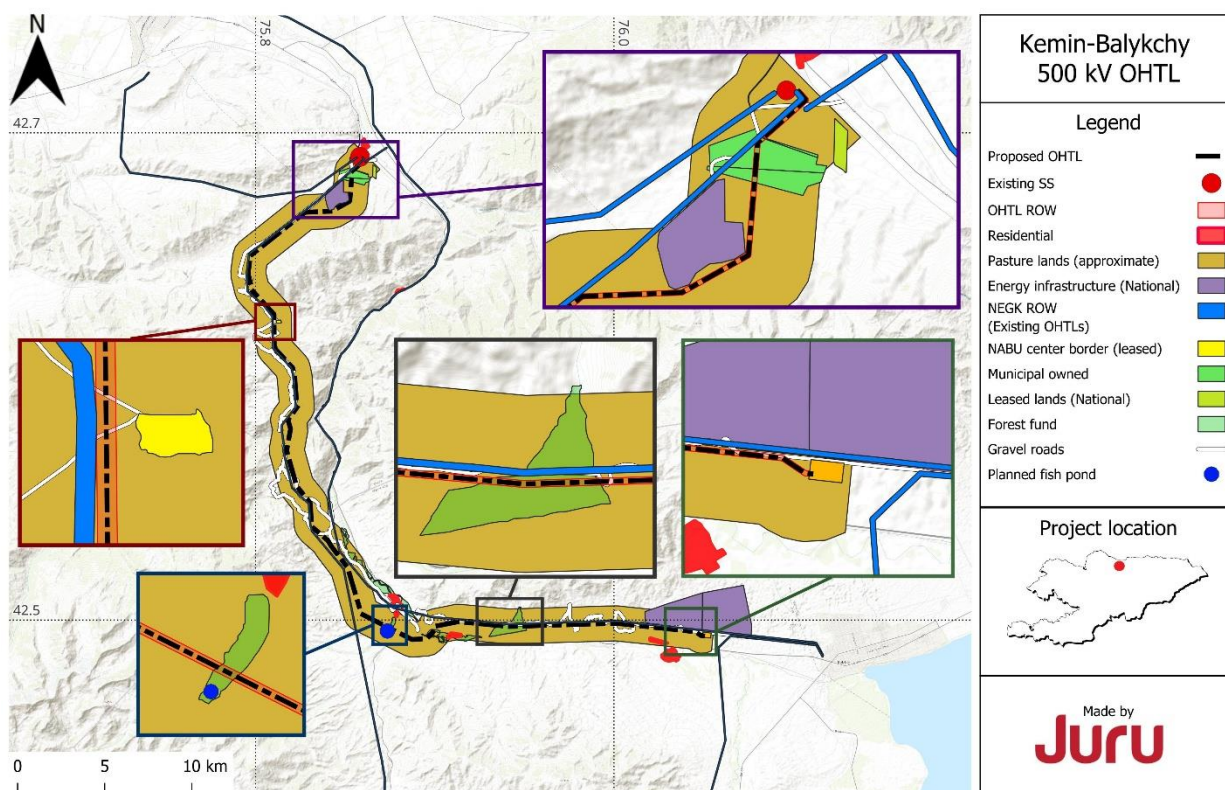
2 Project impacts

The Project route traverses a diverse landscape consisting primarily of pasturelands within the administrative boundaries of Balykchy City and Kemin District in the Issyk-Kul and Chui regions.

Based on consultations and field data, no physical displacement is expected. The OHTL route passes through (Figure 9):

- Municipally regulated pastureland, used by seasonal and year-round herders.
- Forestry land, managed by the Forest Service, Ministry of Emergency Situations.
- Two natural canyons—Konorchek and Kok-Moynok—which are popular recreational areas.
- Major infrastructure, including the EM11 highway, Kyrgyz Railway land, and Chu River.

Figure 9: Land use along the planned OHTL route



There are five structures that are close to the Project RoW, including three stables with herder's houses (68m, 457m and 510m from the OHTL), a planned fishpond (175m) and a household (330m) of Kok-Moynok 2 ayil along the OHTL in the Balykchy city. With regard to the Kemin district, there are several structures in the area, including the NABU Kyrgyzstan rehabilitation centre (135m), the household (220m) of Cholok Ayil and approximately 20 stables with herder's houses. The nearest stable is 51m from the OHTL, while the furthest is between 1,630 and 1,640m. None of these structures are expected to be impacted by the Project in its current alignment. However, it is likely that the owners of these structures, particularly the stables located in Balykchy and Kemin, graze their livestock on the land under the ROW.

To-date it has been identified that the Project will lead to economic displacement of herder households due to temporary and/or permanent restrictions on access to pastureland. Based on Pastureland Management Department (PMD) records and field discussions, 92 herder households (both official (18) and unofficial (74)) are reported to use pasturelands crossed by the OHTL route. This number may increase as more detailed surveys are completed. Following the transition of the Kok-Moynok Ayil Okmotu to the city of Balykchy, a new pastureland management department is being established, offering herders the opportunity to utilise pastures without the need for a contract for a designated period. However, it is possible that these 74 unofficial herders will conclude contracts with the new pastureland management department of the Balykchy city administration before the Project is implemented.

An additional 24 households were identified as using a communal agricultural plot, which is located in the Deu-10 area of Kok-Moynok 2 village. This land plot is used jointly by for haymaking (May to October) and livestock grazing during the rest of the year.

Additional PAPs may be identified during the completion of the LRP, as the upgrades to existing access routes (gravel) or new access routes (gravel) suitable to provide access to the OHTL ROW and new substation have not yet been determined. In addition, there are possible, but not expected impacts on tourism businesses in the region, from visual impacts to the two natural canyons, and the use of medicinal plants, which was identified in the ESIA consultations, but was not noted by PAH that were included in the survey. These and other unexpected additional impacts may be identified once the Project design has been finalized.

2.1.1 Alternatives/Minimization of Impacts

Alternative route options have been considered, including the “do-nothing option”. Not constructing the Project will avoid any potential environmental and social (E&S) impacts; however, this will hinder the objectives of the country’s Energy Sector Strategy and renewable energy transition goals. There is no viable alternative strategic option available for the wider grid strengthening in the North-East. The K-B OHTL plays a key role in connecting the North-Eastern region to the 500 kV network of economically active North.

The K-B OHTL options analysis considers alternatives for both the OHTL route and the location of the Balykchy 500 kV substation. The feasibility study has considered three alternative routes and two location options for the Balykchy 500 kV substation.

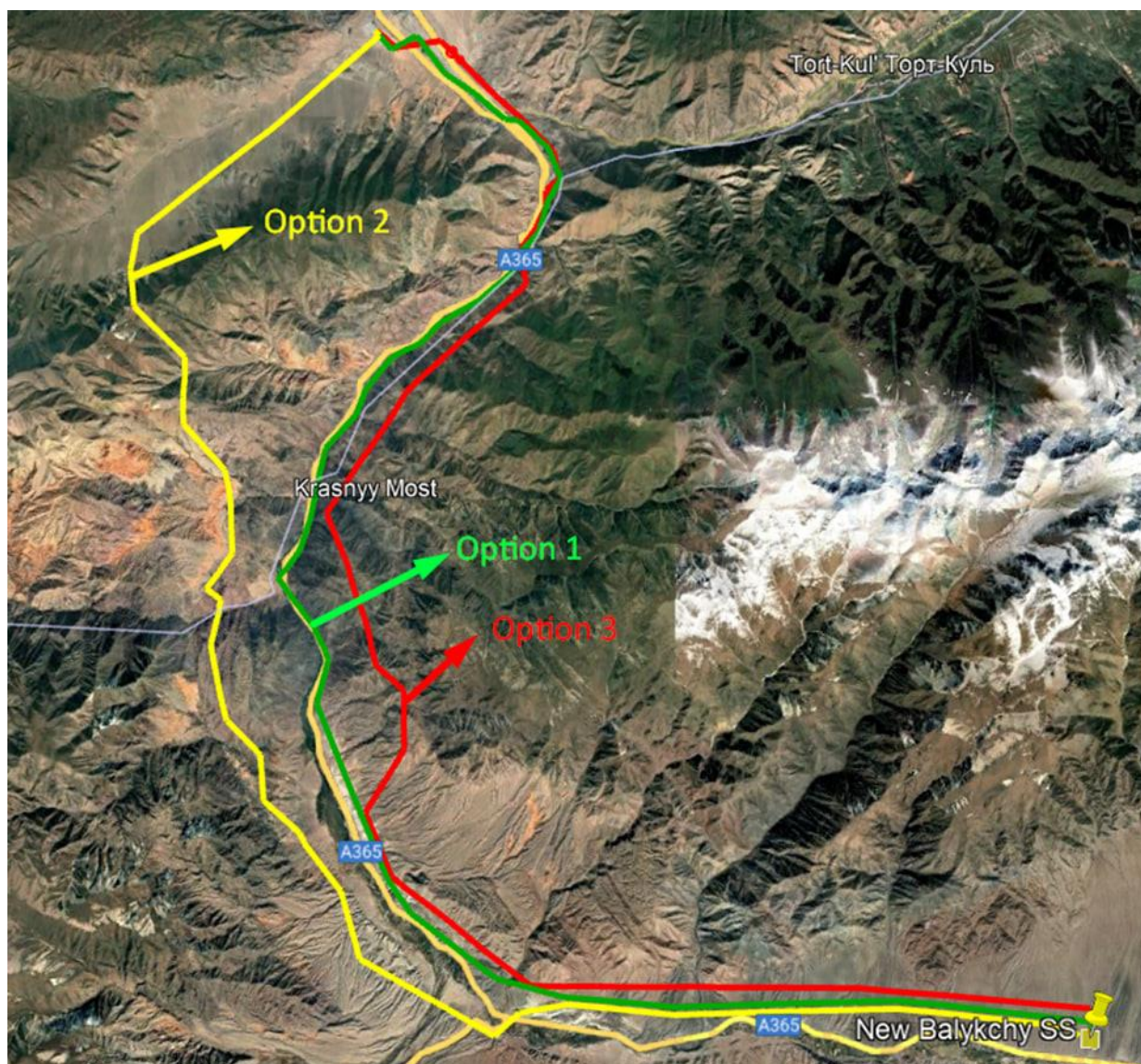
The final selection of the OHTL route was carried out during the feasibility study (FS) stage of the Project, based on the technical, economic, and E&S (Environmental and Social) characteristics of each option (as identified during the scoping phase). The route and substation options are shown in Figure 10 and Figure 11.

All three routes considered for the OHTL traverse the Kemin District (Chui Region) and the city of Balykchy (Issyk-Kul Region) - differing in length and alignment. From the new Balykchy substation, the routes diverge after approximately 15 kilometres:

- **Option 1 (51.2 km)** and **Option 3 (50.7 km)** closely follow the EM11 road corridor and adjacent slopes. Both alignments pass in close proximity to residential properties (18 m and 8 m respectively to the closest residence), necessitating physical resettlement and other mitigation measures. Additionally, these options intersect gardens, commercial enterprises, and pastoral land. From a technical perspective, they also present challenges including multiple crossings with existing infrastructure and the requirement to construct access roads across difficult terrain (approximately 10 km for Option 1 and 26 km for Option 3). Option 3 further requires the installation of long-span towers spanning 1,000 to 2,000 m.
- **Option 2 (updated length: 52.9 km)** is routed southeast of the EM11 road, predominantly following an existing 220–500 kV transmission corridor. This option avoids direct impacts on residential structures (the nearest building is 38 m away – outside of the OHTL sanitary gap) and reduces proximity to commercial receptors. Although it crosses agricultural land and designated hiking areas, these impacts are deemed manageable. Technically, this alignment offers cost savings and operational efficiencies by minimizing the need for new access roads and enabling joint patrol inspections with existing lines. A short section (approximately 5 km) traverses geologically challenging terrain above 2,000 m, although this is considered more feasible than the terrain obstacles associated with the other options.

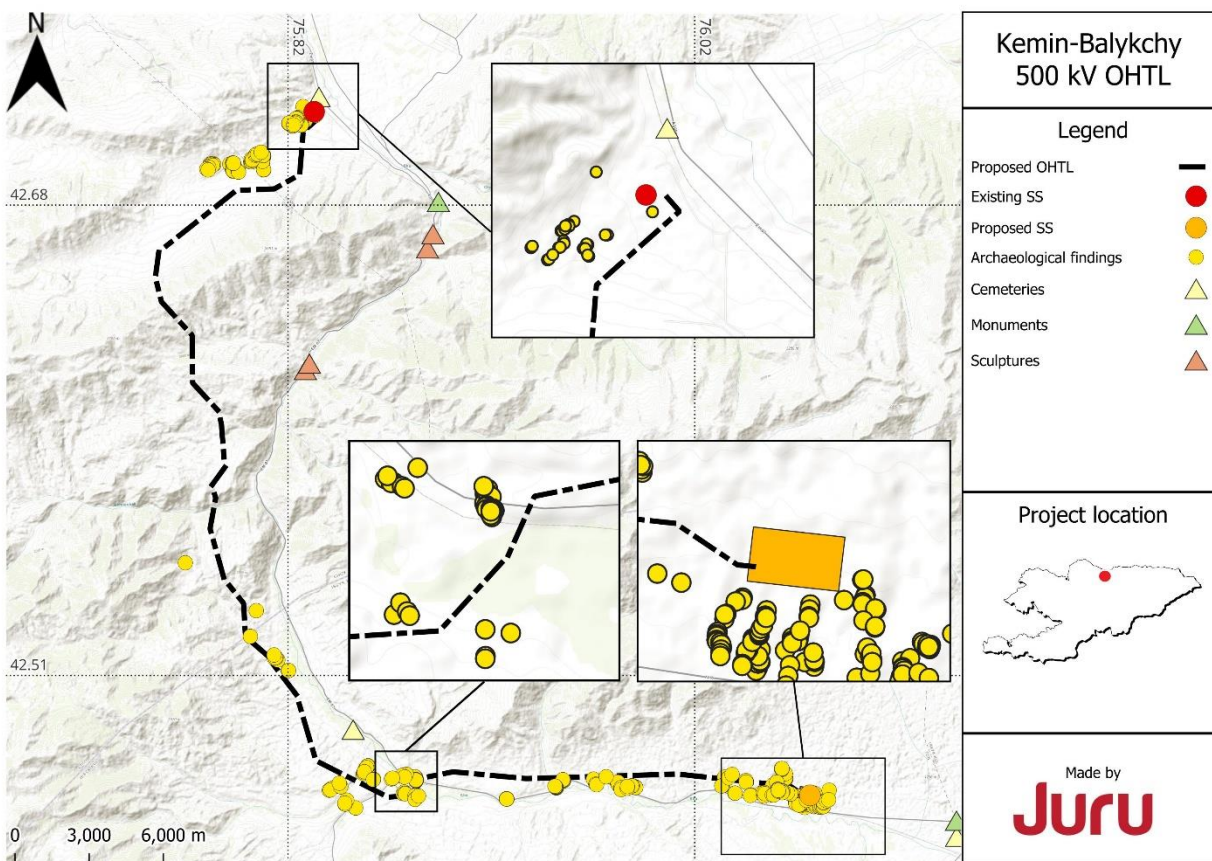
Following a comprehensive multi-criteria assessment, Option 2 has been selected as the preferred route, representing the best balance of technical feasibility, cost-effectiveness, and reduced environmental and social impacts. Figure 10 provides an overview of the three proposed options for the OHTL route.

Figure 10: Proposed options of the OHTL route



During the ESIA phase, Option 2 was further refined. These refinements extended the route length to 52.9 km but allowed the project to avoid sensitive cultural heritage sites and lessen potential impacts on surrounding communities. The alignment was iteratively adjusted at several key locations to avoid sensitive receptors. For example, micro-routing changes were made to bypass an existing fish farm, ponds, and areas with cultural heritage importance near Kok-Moynok-2. To reduce encroachment on rural land use, the changes were made to provide more distance from the outskirts of Kok-Moynok-2 village. The route was also refined to avoid recently identified archaeological features, including ancient burial mounds (kurgans), (Figure 11).

Figure 11: Archaeological findings



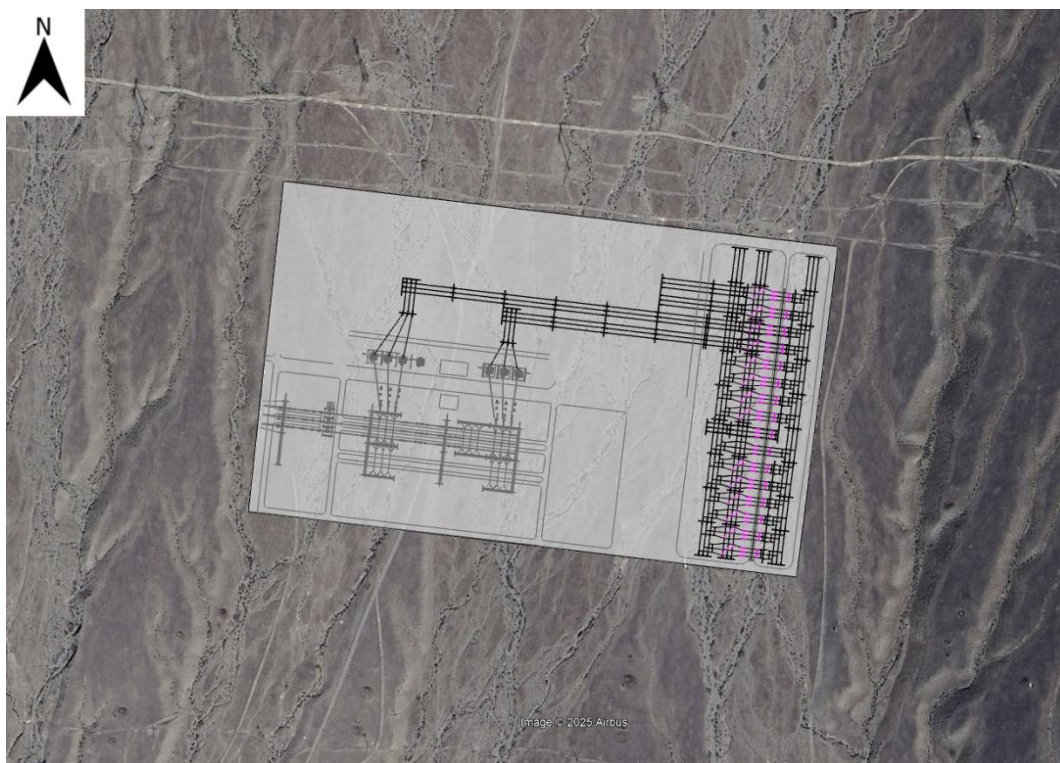
Each of these micro-adjustments was based on a detailed technical and social review to minimise impacts on farms, pastures, residential assets, and biodiversity. By aligning as much as possible with existing rights-of-way and using established access tracks, the Project has avoided the need for additional land take in sensitive areas. These design decisions were informed by site visits, consultations with local stakeholders, and specialist input from environmental and social teams.

As a result of this proactive and detailed alignment work, the final route significantly reduces the potential for involuntary resettlement, physical displacement, and economic displacement.

The final location of the Balykchy Substation was selected following a detailed technical and environmental screening process to identify the most appropriate and least impactful site. Three site alternatives were considered, as shown in the figure below. Option 1 (yellow boundary marked by points A, B, C, and D) was not selected due to the presence of archaeological objects within its footprint, which would have required significant protection or relocation measures. Option 2 (outlined in blue) was also excluded because part of the site overlaps with an identified earthquake epicentre zone, raising concerns about seismic risk. As a result, the preferred location was moved further towards Balykchy city - Option 3 (green boundary marked by points 1, 2, 3, and 4). This site avoids

both cultural heritage sensitivities and seismic constraints and provides a technically viable and accessible area for the substation. Figure 12 below presents the three considered options for the Balykchy Substation. The access road to the selected substation site (Option 3) is still under evaluation and has not yet been finalised.

Figure 12: Proposed options for the Balykchy substation



The designs will continue to be developed in coordination with relevant stakeholders, including cultural heritage authorities and land users, throughout the permitting and land acquisition processes.

3 Legal framework

The Project will need to comply with the legal requirements of the Kyrgyz Republic as well as the EBRD Performance Requirements, in regard to land acquisition and involuntary resettlement. These requirements are summarized in the following sections.

3.1 National regulations

Land acquisition is regulated by various legal acts in the Kyrgyz Republic. Construction of OHTLs requires obtaining permanent land acquisition as well as the servitude (user rights) for both the land under the OHTL towers and the necessary ROW. The following text provides a summary of the legal acts that regulate land acquisition and rights of way in the Kyrgyz Republic.

3.1.1 Constitution of the Republic of Kyrgyzstan (1993, as amended in 2021)

The Constitution of the Kyrgyz Republic, recognizes various forms of ownership, including state, municipal, private, and other forms (Article 15 of the Constitution)

Clause 2 of the Article 15 affirms the inviolability of property and states that no one may be arbitrarily deprived of their property. Property may only be seized against the will of the owner by a court decision, in accordance with the procedure established by law. Property may be seized for public or state purposes as defined by law, provided that fair and preliminary compensation is paid for the property's value and any losses caused by its transfer.

Furthermore, according to the Constitution, everyone has the right to own, use and dispose of their property and the results of their activities (Article 40).

3.1.2 Land Code (1999, as amended in 2022)

Land relations in the Kyrgyz Republic are governed primarily by the **Land Code of June 2, 1999**, which regulates all aspects related to the ownership, use, acquisition, transfer, and acquisition of land plots.

Article 20 of the Land Code defines the Cabinet of Ministers of the government of the Kyrgyz Republic as a central role player in land management. The Cabinet of Ministers is responsible for implementing national land policy, approving land use programs, and establishing rules for land monitoring, valuation and cadastral documentation. It is also responsible for defining the process for expropriating land for state and public needs, and for approving changes in land categories, such as converting agricultural or forest land into industrial or residential use. Through authorized agencies, the Cabinet of Ministers also oversees the development and land planning documentation and controls how land is used and protected (Article 19).

At the local level, responsibilities are divided between several government bodies. The District State Administrations (Article 15) have the authority to allocate land; issue permits for land surveys and monitor land use within their respective territories.

Local self-governments (**Article 13-14**), such as ayil okmotus and city mayors, are responsible for the management of pasture lands, the granting of land use rights, and the control of construction based on urban planning documents. In addition, they spearhead local land reforms and approve local land schemes. As outlined in Article 17, Regional State Administrations are responsible for approving regional land-use plans, issuing survey permits for valuable lands and establishing livestock routes between districts.

According to **Article 27**, land may be allocated for power transmission lines and other linear infrastructure, primarily from non-agricultural or low-value land. When allocating land from the State Forest Fund, priority should be given to areas without forest cover or with low-value vegetation. For

OHTLs and similar linear structures, land should be allocated alongside existing roads, irrigation canals and land parcel boundaries, in order to minimize disruption and optimize land use. In addition, certain categories of land—such as protected natural areas, forests, water bodies, and high-value agricultural lands—are subject to strict regulation or prohibition of acquisition or conversion, as specified in Articles 12 and 20 of the Land Code.

In addition, the Land Code and related legislation establish a number of prohibitions and restrictions on land expropriation for state, municipal or public needs. Specifically the following are not subject to expropriation under any circumstances.

- land plots intended for servicing residential buildings and personal subsidiary farming (Article 32)
- land held in shared ownership by owners of residential and/or non-residential premises in apartment buildings (Article 45)

Moreover, certain land categories can only be expropriated for state and public purposes after specific legal conditions have been met. This includes particularly valuable agricultural land, such as irrigated and rain-fed arable land, perennial fruit plantations, vineyards, fallow land, hayfields and improved pastures. Such land may only be expropriated after it has been formally converted into land for industry, transport, energy or other public infrastructure needs by a decision of the Cabinet of Ministers (Article 74).

Based on Article 66 of the Land Code, legal grounds for expropriation of land plots are the following:

- Use of land plots in violation of their intended purpose;
- Acquisition (purchase) of land plots for state and public needs;
- Non-use of the land plot provided for agricultural production or part of it, for three years;
- Non-use of land plots for non-agricultural production for five years, or for the construction of facilities using renewable energy sources for three years;
- Failure to pay land tax within the time limits established by tax legislation;
- Failure to pay insurance contributions within the time limits established by the Law of the Kyrgyz Republic “On Insurance Contribution Rates for State Social Insurance”;
- Termination (Cancellation) of subsoil use rights by a state body for subsoil use in cases provided for by the law of the Kyrgyz Republic “On Subsoil”;
- Failure to pay rent for a land plot provided from state or municipal property within six months, or within the time established by the contract;
- Misuse of state or municipal land allocated to a fully state-owned mortgage housing body for implementing government programs.

Chapter 11 of the Land Code sets out the rules for expropriating land for public and state needs. Acquisition can only occur following full compensation to the landowner or user, including the cost of

the land rights and reimbursement for any damages or lost income. This includes losses from the early termination of third-party obligations (Article 66, Article 68). acquisition must be carried out in accordance with judicial procedures and only on the basis of law.

According to Article 68, clause 1, the acquisition of land for state or public needs may be executed on the basis of an agreement between the authorized body and the landowner or land user. Should the landowner or land user object to the acquisition (purchase) of the property or its terms, the competent authority is entitled to initiate legal proceedings within two months of receiving the objection to claim compensation for the acquisition (purchase) of the land plot.

- **Clause 2** of Article 68: until court makes a decision on the acquisition (purchase) of the land plot, the landowner or land user has the right to exercise their rights to the land plot and incur necessary expenses to ensure its use in accordance with its designated purpose. However, the landowner or land user bears the risk of covering costs and losses related to new construction, expansion, or reconstruction of buildings and structures during this period.
- **Clause 3:** When determining the purchase price of the land plot, it must include the market value of the land rights and any buildings and structures located on it, as well as the losses incurred by the landowner or land user due to termination of rights to the land plot. This also includes losses related to the early termination of obligations with third parties.
- **Clause 4:** In cases where the land is expropriated for state and public needs with the consent of the landowner or land user, they may be provided with another land plot, with the value of the new land rights offset against the purchase price.

Article 111 outlines that land valuation that normative (standard) pricing of land is determined using a system of natural and monetary indicators. These valuations are used for calculating land tax, determining the value of compensation, and assessing land use efficiency. The methodology for valuation is defined by separate legislation and executive decisions.

It should be noted that the new Land Code of the Kyrgyz Republic is being prepared and will be published in the near future.

3.1.3 Civil Code (1996, as amended in 2024)

The Civil Code of the Kyrgyz Republic serves to complement the Land Code by establishing overall legal principles for the protection of ownership rights and regulating the management of immovable property. According to Article 25, the official registration of land and other real estate in the unified state register is a prerequisite for the legal recognition of these rights, including in the context of compensation claims.

Article 14 of the Civil Code defines those recoverable losses include both actual losses (expenses incurred to remedy a violation or restore property) and lost profits (the income the person would have earned under normal conditions). These may be claimed in full. Article 15, stipulates those losses

caused by unlawful actions or inaction of the state or local government bodies – including unlawful acts or decisions – are subject to compensation by respective bodies.

The Civil Code also stipulates two ways of acquiring the land for public needs. Through expropriation and purchasing. Article 233-17 reinforces that the acquisition of land for state or public needs is only permitted by court decision and must be accompanied by full compensation. Article 233-18 specifies that purchasing the land for state and public needs may be executed through an agreement or, in the event that no agreement is reached, through legal proceedings initiated within two months, from the date of receipt of the refusal. Article 284 stipulates that expropriation is only permissible if the state can demonstrate that no other option exists to achieve the intended public purpose.

3.1.4 Forest Code of the Kyrgyz Republic (1999, as amended in February 2024)

Article 32 of the Forest Codes states that, land from the State Forest Fund may solely be expropriated for public and state needs only in accordance with the Land Code of the Kyrgyz Republic. Such expropriation is permitted only if a positive conclusion is provided by the Republican state forestry authority confirming the land withdrawal is appropriate.

Article 33 emphasizes that the conversion of forest land for use in activities unrelated to forestry shall only be permitted in exceptional cases, following a state environmental review and approval from the republican state forestry management authority, as determined by the Cabinet of Ministers of the Kyrgyz Republic. The procedure for converting forest land into non-forest land shall be established by the Cabinet of Ministers of the Kyrgyz Republic.

Article 100 requires that forestry losses and damages caused by individuals or legal entities on lands of the State Forest Fund or other protected lands must be fully compensated. The compensation is calculated based on the normative (standard) land value, following a methodology set by the Cabinet of Ministers. Any disputes regarding compensation will be resolved through the appropriate judicial procedures.

3.1.5 The Law of the Kyrgyz Republic “On the Procedure for Considering Citizens’ Appeals” No. 67 (May 25, 2011, as amended February 12, 2025)

In the Kyrgyz Republic, people's grievances are accepted in electronic and written form. According to the Law on the Procedure for Considering Citizen's Appeals, they may also apply in person. Appeals must be registered by the relevant state or local government body as soon as they are received and answered within 14 working days of registration (Article 8.2). (Article 8.2). If special checks or additional documents are required, the review period may be extended by up to 30 calendar days, provided the applicant is notified in writing. If the appeal concerns multiple agencies, it must be forwarded to the relevant bodies within five working days. The law states that anonymous and repeated appeals with no supporting evidence will not be reviewed. If a citizen disagrees with the outcome, they can challenge the decision in court.

3.1.6 Other relevant laws, Presidential Decrees and Resolutions of Cabinet of Ministers

Additional national laws and legislations related to land acquisition and compensation in Kyrgyz Republic are provided in Table 4 below.

Table 4: Summary of other relevant legislation

Legal Requirement	Summary
Law “On Valuation Activity” (dated December 22, 2025, № 150)	In cases where land is acquired for public or state needs, it is essential to conduct cadastral valuation. This process is carried out by independent certified appraisers or by valuation organizations that are licensed for this purpose. As outlined in Article 13, the valuation may be based on market value or other types depending on the applicable standards and the valuation's specific purpose. Factors such as land use, profitability, condition and market demand must be considered in the valuation.
Decree of the President of the Kyrgyz Republic “On National Projects of Strategic Importance to the Country” №63 from March 23, 2023 (as amended May 28, 2025, with Decree of the President № 166)	According to the recent amendments, the decree requires the Cabinet of Ministers to develop a procedure for transferring state-owned lands for such projects. It also states that when land plots are auctioned, the starting price must reflect market value, determined by independent appraisers, in line with international and national valuation standards. This involves applying best-use analysis and income-based approach, taking into account project -related benefits and infrastructure.
“Rules on State Registration and Restrictions on Real Estate and Transactions Therewith” approved by the” Resolution of the Cabinet of Ministers #49, from February 15, 2011 (as amended March 18, 2025)	It stipulates that protective zones must be established on utility land (i.e., land used for power and communication infrastructure, including supports, cables, antenna systems and service roads) to ensure safety and maintenance. Ownership rights to such infrastructure are registered based on land allocation decisions, transfer to operational management and supporting technical documentation. Local authorities must formally register any acquisition, requisition or nationalization of immovable property, and this must be based on a decision by a court or authorized body.
Resolution of the Cabinet of Ministers “On Approval of the Procedure for Forest	This resolution sets out the process for carrying out forest management activities when forest land is requisitioned for state and public purposes in the Kyrgyz Republic. It stipulates that land users must

<p>Management in the Kyrgyz Republic” № 43 from January 29, 2025.</p>	<p>cover the cost of forest management in cases such as the construction of infrastructure (e.g., roads, hydroelectric stations and power lines). Forest management reports must include detailed data on forest resources, calculations of loss and damage, planned mitigation measures and maps. These reports are mandatory when land is withdrawn from the state forest fund or protected areas.</p>
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3.1.7 Right of Way

Right of Way (ROW) is defined as “servitude” in the legislation of the Kyrgyz Republic. The required size of the ROW for an OHTL is determined under Sanitary and Epidemiological Rules and Standards (SanPiN), approved by the Resolution of the Government of the Kyrgyz Republic dated April 11, 2016, No. 201, which also establishes guidelines for the placement, design, construction, and operation of newly constructed, reconstructed, and existing industrial and energy facilities.

To protect the population from the electric fields generated by OHTLs, a sanitary gap is established along the high-voltage OHTLs routes, ensuring that the electric field intensity does not exceed 1 kV/m outside these zones. For newly designed OHTLs, as well as buildings and structures, the boundaries of the sanitary gaps along the OHTL routes, with horizontally arranged conductors and without electric field intensity reduction measures, are as follows (measured from the projection of the outer phase conductors onto the ground, perpendicular to the OHTL):

- 20 meters for OHTL with a voltage of 330 kV;
- 30 meters for OHTL with a voltage of 500 kV;
- 40 meters for OHTL with a voltage of 750 kV;
- 55 meters for OHTL with a voltage of 1150 kV.

Thus, for the Project OHTL a sanitary gap of 30 m on either side of the outermost conductor will be established. At the commissioning and operation stages, the sanitary gap can be adjusted based on the results of instrumental measurements. When commissioning a facility and during its operation, the sanitary gap must be adjusted based on the results of instrumental measurements. The sanitary gap prohibits permanent residential properties within this area and the routing will be designed to maintain at least 30 m at all times.

The main regulations for obtaining ROW are the Land Code of the Kyrgyz Republic (Chapter 8 (Articles 53-59), the Civil Code (Articles from 233-11 to 233-15) and the law of the Kyrgyz Republic “On State Registration of Rights to Real Estate and Transactions Therewith” No. 153, dated December 22, 1998.

According to Article 59 of the Land Code and Article 233-11 of the Civil Code, there are two kinds of ROW: Voluntary and Compulsory.

Articles 233-11 – 233-12 defines the voluntary ROW, which can be established through mutual agreement between landowners. The agreement must include a description of the land, purpose, duration and a map showing the location of the ROW. It does not deprive the landowner of ownership rights and can be indefinite and time bound.

Article 233-13: compulsory ROW can be imposed by a state or local authority if access or infrastructure (e.g., power lines, pipelines) cannot be ensured otherwise. A landowner whose property is encumbered by such a ROW is entitled to compensation or a proportional payment from the party benefiting from the servitude.

ROW should be legally registered and contain all conditions that were agreed between the parties. It remains valid even if the land or property is sold or transferred. They cannot be traded separately from the land (**Article 233-14**). ROW may be terminated if the need for it no longer exists or if it prevents the property from being used as intended.

3.2 EBRD Performance Requirements

EBRD's resettlement and livelihood restoration requirements are primarily found in PR5 – Land Acquisition, Restrictions on Land Use and Involuntary Resettlement and PR 10 – Information Disclosure and Stakeholder Engagement.

PR5 “recognises that involuntary resettlement can result in long-term hardship and impoverishment for affected persons and communities in areas to which they have been displaced. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or resources, and/or loss of access to assets or resources that leads to loss of income sources or means of livelihood) as a result of project-related land acquisition and/or restrictions on land use”³.

Requirements of PR5 are as follows:

- Avoid or when unavoidable, minimise, involuntary resettlement by exploring alternative project design;
- Mitigate adverse social and economic impacts from land acquisition or restrictions on affected persons' use of and access to assets and land by: (i) providing compensation for loss of assets at replacement cost; and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation and the informed participation of those affected;
- Restore or, where possible, improve the livelihoods and standards of living of displaced persons to pre-displacement levels; and
- Improve living conditions among physically displaced persons through the provision of adequate housing, including security of tenure at resettlement sites.

³ EBRD, Performance Requirement 5 (in EBRD ESP 2019).

PR5 applies to physical and/or economic displacement resulting from the following types of land-related transactions:

- Land rights or land use rights acquired through expropriation or other compulsory procedures in accordance with the legal system of the host country;
- Land rights or land use rights acquired through negotiated resettlements with property owners or those with legal rights to the land including customary or traditional rights recognised or recognisable under the laws of the country, if expropriation or other compulsory process would have resulted upon the failure of negotiation; and
- Imposition of restrictions that result in people experiencing loss of access to physical assets or natural resources irrespective of whether such rights of restriction are acquired through negotiation, expropriation, compulsory purchase, or by means of government regulation⁴

PR10 requires developers to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, particularly the directly affected communities;
- Provide means for effective engagement with the project's stakeholders (including land users) throughout the project lifecycle;
- Ensure that appropriate environmental and social information is disclosed, and meaningful consultation is held with the project's stakeholders and where appropriate, feedback provided through the consultation is taken into consideration; and
- Ensure that grievances from affected communities and other stakeholders are responded to and managed appropriately.

Specific stakeholder engagement related requirements for the land acquisition process include the need to ensure affected persons will be given the opportunity to participate in determining the eligibility requirements, in negotiations of the compensation packages, selecting resettlement assistance and proposed timing for land acquisition and livelihood restoration activities. Consultation must continue during the implementation, monitoring and evaluation of the land acquisition process so as to achieve outcomes that are consistent with the objectives of EBRD PR10.

3.3 Gap analysis between EBRD Performance Requirements 5 and 10 and national regulations

Differences and gaps between Kyrgyz legislation and EBRD requirements are summarised in Table 5 below.

⁴ This includes those with no recognisable legal right or claim to the land they occupy.

Table 5: Main gaps between national legislation and EBRD PR5 and PR 10

Element	EBRD PR5	Kyrgyzstan Legislation	Measures to bridge the gap
Avoid or minimise displacement	Project developer should avoid, and if it is not possible, to minimize physical and/or economic displacement.	The Kyrgyz legislation allows land acquisition if justified for public/state needs, with compensation.	The Project has incorporated project-level planning to identify alternatives to avoid displacement where feasible and document justification where unavoidable.
Planning process	The Project Developer should develop a resettlement/livelihood restoration plan to avoid risk and impact associated with the project.	According to legislation, only compensation and court-based resolution are required; no legal requirement to prepare a Resettlement Action Plan (RAP)	The Project will develop an LRP (or update this LARF) in accordance with PR5 requirements.
Eligibility for compensation	The Project developer should carefully examine potentially impacted people/ all land users and set up an entitlement matrix of those who are eligible for compensation	Only landowners and legal land users are eligible for compensation according to Land Code Art. 66. No recognition of informal and seasonal users.	The Project will extend eligibility to include informal users, tenants and seasonal users with livelihoods tied to the land as per EBRD PR5.
Compensation and benefits for displaced people	The Project Developer will offer economically displaced communities and people compensation for loss of assets at full replacement cost and compensate for any loss of income during relocation.	Under Art.66 of the Land Code, land acquisition shall be made with payment to the owner of the right minus the costs associated with the land acquisition implementation costs,	The market value (at replacement cost, as determined by a registered valuator) including transaction costs, will be provided to displaced PAPs, without deducting the costs for land acquisition.
Compensation for loss of livelihood	Where livelihoods are displaced the Project Developer will offer the PAPs land-based compensation/non - monetary compensation	With the owner's or land user's consent, the owner may receive another land plot with the deduction of the value of the right to it in	The Project will provide livelihood restoration, compensation for loss of livelihoods.

Element	EBRD PR5	Kyrgyzstan Legislation	Measures to bridge the gap
		the redemption price (Art. 68 of the LC)	
Compensation payment timing	The Project Developer must only take possession of land once all compensation has been made available	Land can be acquired only after compensation is completed.	No gaps.
Inventory of affected assets & establishment of a cut-off date	The Project Developer should announce cut off dates for all identified PAPs and conduct an inventory survey	A valuation should be completed under national law to prepare the Land Acquisition Plan. However, no specific requirement for a cut-off-date.	NEGK will conduct negotiations with all identified land users, agree on cut-off date and publicly disclose it. Inventory survey will be performed by NEGK in the presence of the property owner.
Vulnerable groups	Vulnerable groups should be identified and special assistances shall be provided to restore/ improve their pre-project level of livelihoods	No additional support for vulnerable groups is stipulated.	Vulnerable groups, if identified, will be provided assistance per EBRD requirements
Information disclosure	Resettlement-related documents to be timely disclosed, on the EBRD website	No disclosure requirement exists.	Disclosure will be completed per EBRD requirements
Stakeholder consultations	The Project Developer must hold meaningful public consultations PAPs through all stages of LRP implementation	PAPs and relevant stakeholder must be consulted from the early stage of the project planning.	The same principle applies, however additional consultations are required by EBRD, these will be undertaken per EBRD requirements.
Grievance mechanism	The Project Developer should establish a mechanism for receiving grievances from PAPs. All grievances received through the grievance mechanism should be	In accordance with the Law on Citizens' Appeals" PAPs have the right to submit complaints to any relevant state authority. However, there is no	The project will set up a separate GRM for PAPs (a temporary GRM is currently in place). NEGK will take over full responsibility for the GRM when it takes over

Element	EBRD PR5	Kyrgyzstan Legislation	Measures to bridge the gap
	addressed in a timely manner.	specific mechanism for addressing grievances related to loss of livelihoods.	this LARF. This will enable PAPs to communicate directly with NEGK or its EPC Contractor.
Monitoring of LRP/RAP Implementation	Implementation of LRP is subject to monitoring, and monitoring reports shall be disclosed.	Legislation does not require a monitoring and evaluation mechanism.	The Project will establish monitoring and evaluation of the LRP based on the monitoring requirements included in this LARF.

4 Preparation of resettlement and livelihood restoration plans

Once the Project design is completed, a Livelihood Restoration Plan will need to be prepared⁵. This requirement will fall to NEGK, who may hire a third party consultant to complete this task. The Livelihood Restoration Plan will be based on the information provided in this LARF. In addition, it will include final land acquisition requirements and provide specific information on and compensation to be provided to the PAPs.

In order to determine the amount of land which is required for land acquisition (for the tower footprints) and servitude (for the ROW) NEGK will need to:

- Confirm the final Right of Way (RoW) and Sanitary Gap for the OHTL, based on the design alignment. The RoW is 39 metres from each side of the centreline; the Sanitary Gap is 30 metres on each side.
- Confirm the tower placement and spacing along the 52.9 km route, based on the engineering design.
- Determine the footprint size of each tower, to assess the permanent loss of pastureland at foundation locations.
- Confirm the final location of the Balykchy SS and the access road to the substation and the amount of land that will need to be acquired for this infrastructure and the RoW for the road.
- Identify temporary land use needs, including access roads, material laydown areas, and construction zones that may limit grazing access.
- Coordinate with local governments and pastureland management departments to estimate the total area affected across the three jurisdictions: Balykchy City, Orlovka City, and Kyzyl-Oktyabr Ayil Okmotu.
- Identify any land use changes required by law and start the national regulatory process to make the land use changes.

Once this information is determined, the Project will need to:

- Conduct a census and socioeconomic survey of all PAPs—both registered and unregistered—who use the land, including farming, haymaking and grazing livestock within the RoW and Sanitary Gap, to confirm:
 - Total number of Project Affected People (PAPs);
 - Type and intensity of land use (seasonal or year-round grazing);
 - Socioeconomic vulnerability and dependency on affected areas;
- Set up a cut-off date for compensation; and
- Prepare the Livelihood Restoration Plan, in consultation with PAPs.

⁵ Given that no physical displacement has been identified, it is unlikely that a resettlement plan will be required. However, should there be a significant change to the layout (unexpected), then a resettlement plan may be required.

The processes required to prepare and write the LRP are discussed further, in the sections below.

4.1 Methodology for the census and socio-economic surveys

When land is expropriated under Kyrgyz law there is a requirement for the preparation of a Land Acquisition Plan, which includes the creation of a database containing information on landowners and land users, as well as on land plots and real estate objects located on land plots subject to acquisition. However, this information will only cover legal landowners and land users and therefore will not be sufficient to identify all impacts, and vulnerabilities of PAPs, as required by EBRD.

As part of the LRP preparation a comprehensive census survey and socio-economic survey will be conducted covering all land required for the Project in order to identify Project Affected Persons (PAPs) and assess the full extent of their losses (see Section 8). These surveys will serve as the foundation for entitlement planning, compensation calculations, and monitoring of livelihood restoration outcomes. The two surveys will likely be carried out simultaneously to optimise efficiency and ensure consistent data collection.

Prior to survey implementation, PAPs and local communities will be informed of the objectives of the surveys and the rationale behind the process. This will include public disclosure of the cut-off date, beyond which no further claims to entitlements will be considered (details below).

4.1.1 Census Survey

The census will establish the number, location, and identity of PAPs and record the nature of impacts on each household. It will include a full inventory of affected assets, such as:

- Size and type of affected land (agricultural, residential, etc.),
- Structures (permanent, temporary and the materials from which they are made),
- Crops and trees,
- Income sources and employment status.

This survey will ensure that all impacts to PAPs—whether landowners, tenants, or informal users—are properly identified, recorded and included in the entitlement matrix.

4.1.2 Socio-Economic Survey

The socio-economic survey will generate a baseline profile of the affected population, which will be used to:

- Inform compensation and livelihood restoration strategies,
- Identify vulnerable groups (e.g., female-headed households, elderly, people with disabilities),
- Monitor post-resettlement outcomes.

The survey will collect disaggregated data on:

- Household composition and demographics,
- Education and health status,
- Income sources and expenditure patterns,
- Access to services and infrastructure.

Where possible, data will be gender-disaggregated to support gender-sensitive planning and monitoring.

4.1.3 Cut-Off Date

A clearly defined cut-off date will be established to mark the end of eligibility for inclusion in the compensation process. It is expected to coincide with the final day of the census and socio-economic surveys. The date will be widely publicised in affected areas through:

- Letters sent to each identified PAP;
- Community meetings;
- Letters sent to local government offices (ayil okmotus, akimiyats); and
- Posted notices in public locations.

Any individuals or assets settled or developed after the cut-off date will not be eligible for compensation.

4.1.4 Valuation and Compensation

Upon identification of PAPs and affected assets, an independent, certified valuer—contracted by NEGK—will determine compensation at full replacement cost in line with national legislation and international standards (e.g., EBRD PR5), see Section 10 for further details). The valuation process will be transparent and participatory. PAPs will have the opportunity to review and provide feedback on the proposed compensation offers.

Where appropriate, compensation agreements will be formalised through negotiated contracts between NEGK and the PAPs. All records will be maintained in a dedicated database for tracking and audit purposes.

4.1.5 Livelihood Restoration Plan (LRP)

A Livelihood Restoration Plan (LRP) will be prepared in consultation with affected individuals and households. The basic principles for the LRP are included in this LARF, and therefore this document will be used as a basis for the LRP. Additional activities required will be to include the baseline information (identified through the socioeconomic surveys), identify the number of vulnerable PAPs,

and calculate the compensation requirements, and allowances, for each PAP based on the valuation completed and any PAPs that require additional assistance.

The LRP will also outline feasible activities to restore or enhance livelihoods, which will be tailored to the needs of different groups. Potential activities may include:

- Skills training and employment support,
- Agricultural inputs or extension services, and
- Microenterprise support or financial assistance.

Where feasible, livelihood support activities will commence early in the land acquisition process and may continue during the construction phase to ensure a smooth transition.

4.1.6 Responsibilities and Grievance Redress

NEGK will be responsible for the delivery of compensation payments, which will be made through accessible and transparent channels. The payment methods, timelines, and points of contact will be disclosed in the LRP.

Consultations will be maintained throughout the process with all relevant stakeholders, including:

- Project Affected Persons (PAPs),
- Mayor's Offices,
- District akimiyats,
- Ayil okmotus and community leaders (head of ayils),
- The Pasturelands Management Department under local municipalities, among others.

PAPs will also have access to Grievance Redress Mechanism (GRM) throughout the land acquisition and resettlement process, as outlined in Section 16.

5 Socioeconomic Baseline

This section summarises key social and economic characteristics of the Project Area of Influence (Aoi). A socio-economic profile of the communities in the AOI was developed through a socioeconomic survey of the AOI communities that was undertaken in April 2025. A total of 131 surveys were undertaken from 12 ayils, Balykchy city and other households along the OHTL, from a total population of 7,384 households of the Aoi communities. The following table provides an overview of the Aoi surveys.

Table 6 Distribution of Aoi respondents by ayils

Settlement/village/Micro district/Ayil	Total number of households	Number of surveyed households	Percentage of the total households surveyed	Percentage of the surveyed population
Balykchy	n/a	18	n/a	13.7%
Boroldoy	517	6	1%	4.6%
Cholok	15	7	46.6%	5.3%
Dorozhniy	32	6	18%	4.6%
Jil-Aryk	69	6	8%	4.6%
Kemin	2,728	9	0.3%	6.9%
Kichi-Kemin	602	6	0.9%	4.6%
Kok-Moynok 1	164	24	14.6%	18.3%
Kok-Moynok 2	116	14	12%	10.7%
Kyz-Kiya	22	5	22.7%	3.8%
Kyzyl-Oktabr	304	15	4.9%	11.5%
Orlovka	2,623	3	0.1%	2.3%
Other (households along the OHTL)	n/a	9	n/a	6.9%
Sovetskoye	192	3	1.5%	2.3%
Total	7,384	131	1.7%	100%

In addition to the household survey, focus group discussions (FGDs) were held in four ayils Kok-Moynok 1, Kok-Moynok 2, Kyz-Kiya and Cholok to support this baseline assessment. When the statics below discuss the full survey, it will be described as the “Aoi” respondents or the “Aoi” population etc.

Where possible surveys were completed with PAPs. A total of 42 of the 131 surveyed households were PAPs. Where possible, this information has been specifically selected in the sections below. When discussed in the sections below, these will be specified as “PAP” respondents, or “PAH” members etc.

A summary of the information found in the surveys and consultations within Aoi and with PAH families has been included in the following sections.

5.1 Demographics

The total population across the four ayils that will be most impacted by the Project is 1,847, with a nearly equal gender split – 50.8% male and 49.1% female. The gender balance varies slightly by community. In Kok-Moynok 1 and Kyz Kiya, the number of men is higher than women, while in Kok-Moynok 2 and Cholok women slightly outnumber men as shown in the Table 7 below.

Table 7: Population and gender distribution of the Aol

Name of Ayil	Population	Male		Female	
Kok-Moynok 1	1,035	548	52.9%	487	47%
Kok-Moynok 2	663	313	47.2%	350	52.7%
Kyz-Kiya	87	50	57.4%	37	42.5%
Cholok	62	28	45.1%	34	54.8%
Total	1,847	939	50.8%	908	49.1%

Source: Minutes of meeting with the head of ayils and Passports of Kyzyl-Oktyabr and Kok-Moynok Ayil Okmotus

The Aol surveyed population consisted of 582 people across 131 households. The gender distribution was 313 men (53.8%) and 269 women (46.2%). The average household size ranged between two and six members with the biggest household reaching 10 people. The population structure was relatively young, with 23.2% of household members aged 7–17 years and 14.4% under 6 years. However, only 47% of residents were of working age (18–60), reflecting a pattern of labour migration from the area.

Project-Affected Households (PAHs) members are comprised of 197 individuals, including 114 men (57.9%) and 83 women (42.1%). The largest household size of the PAH households is 10 people. The demographic profile of the PAH reveals a population largely composed of children and young people. Individuals aged 0 to 17 years represent 32.5% of the total PAH population, highlighting a youthful community with significant dependency needs. The working-age population (18 to 60 years) accounts for 49.2%. Meanwhile, 15.2% of PAH members are aged 61 and above. Therefore more than half (50.8%) of the PAH population is made up of either young or elderly dependents. The following table provides the age ranges of the PAPs.

Table 8: Age ranges of PAH members

Aol community	0-6	7-17	18-20	21-25	26-30	31-40	41-50	51-60	61-70	above 70	Total
Number	28	36	8	17	7	26	18	27	25	5	197
Percentage	14.2%	18.3%	4.1%	8.6%	3.6%	13.2%	9.1%	13.7%	12.7%	2.5%	100%

5.2 Ethnicity and religion

In Kemin district, 91% identify as Kyrgyz, 6.2% as Russian, and 1% as Kazakh, with the remainder composed of smaller minorities. Showing that the Aol population is predominantly ethnic Kyrgyz. Although religion was not a primary focus of the socio-economic survey, the Aol population—like the broader Kyrgyz population—is predominantly Muslim, with a small number of Christian or non-practising individuals likely among minority ethnic groups.

Among the 42 probable PAH, 196 are Kyrgyz. The remaining one person, a household head's spouse, belongs to a minority Central Asian group (e.g., Kazakh, Tajik, Turkmen, or Uzbek). This reflects the broader ethnic homogeneity of the affected population. Most residents speak Kyrgyz as their first language, while Russian and Uzbek are also commonly understood. No Indigenous Peoples were identified in the Aol or the PAH group per EBRD PR7.

5.3 Education

Basic education attainment in Issyk Kul Oblast was lower than the national average in 2023, with 91.1% of the population completing basic education. Boys had a higher basic education attainment rate in the oblast (91.7%) than girls (90.4%). Secondary education attainment is also lower in Issyk-kul oblast, with a total of 85.1% (84.4% for boys and 85.8% for girls)⁶.

Basic education attainment in Chui Oblast was higher than the national average in 2023, with a total of 105.1%. Boys and girls had almost the same attainment levels with boys at 105.1% and girls at 105%. Secondary education in Chui oblast is also slightly higher than the national average at 95.6%. Boys levels of secondary education are lower than girls as 94.3% compared to 96.9%⁷.

School attendance among children from Aol households is uneven. Although 67% of Aol households had school-aged children, only 78% of them attended school. Attendance was highest in Dorozhniy, Sovetskoye, and Jil-Aryk communities. Kindergarten attendance was especially low, only 19% of children attended kindergarten, although rates were higher in some ayils such as Sovetskoye and Cholok.

Table 9: School attendance rate of children in the Aol households

Settlement/village/Micro district/Ayil	Do not attend school	Attend school	Total
Balykchy	17%	83%	100%
Boroldoy	40%	60%	100%
Cholok	40%	60%	100%
Dorozhniy	0%	100%	100%
Jil-Aryk	0%	100%	100%

⁶ Ibid.

⁷ [Education - Statistics of the Kyrgyz Republic](#)

Settlement/village/Micro district/Ayil	Do not attend school	Attend school	Total
Kemin	14%	86%	100%
Kichi-Kemin	0%	100%	100%
Kok-Moynok 1	16%	84%	100%
Kok-Moynok 2	29%	71%	100%
Kyz-Kiya	20%	80%	100%
Kyzyl-Oktabr	27%	73%	100%
Orlovka	50%	50%	100%
Other (households along the OHTL)	67%	33%	100%
Sovetskoye	0%	100%	100%
Total	22%	78%	100%

The overall education level in the Aol is relatively high. Nearly 30% of surveyed individuals had completed high school, 17.2% had attended college or a lyceum, and 15% held a bachelor's or master's degree. Women had a slightly higher rate of tertiary education attainment than men.

A similar pattern was reflected in the PAP survey groups, where 32.5% of individuals had graduated from high school, 19.8% had completed secondary special education, and 13.7% held higher education degrees. Additionally, 30.5% were children still in education, one individual (0.5% of the population) was identified as illiterate.

Table 10: Education levels of PAH members

Education level	Number of Individuals	% of Total (197)
Illiterate	1	0.5 %
Can read and write, but didn't graduate from secondary school	0	0 %
Child (still completing education)	60	30.5 %
Graduated from high school (grades 10–11)	64	32.5 %
Graduated secondary school	6	3 %
Secondary special (vocational, lyceum, technical school)	39	19.8 %
Higher education (Bachelor's, Master's, PhD)	27	13.7 %
Total	197	100 %

5.4 Health

Access to healthcare services across the Project Area of Influence (Aol) is generally adequate, although coverage and quality vary between settlements. Most communities are served by paramedic and midwife stations (PMS), and some have family doctors available. For example, Kok-Moynok 1 benefits from a newly built, well-equipped health post, while Kok-Moynok 2 operates an older, partially

renovated facility. In contrast, Kyz-Kiya and Orlovka have more limited healthcare access and depend on nearby towns such as Kemin or Balykchy for more advanced services.

Most surveyed AOI residents reported that healthcare facilities were located within walking distance: 57.6% of respondents live within 1 km of a clinic, and 62% stated they could reach healthcare services in under 10 minutes. About 54% of all surveyed AOI households rated local healthcare services as good or very good.

Among the 42 probable PAP households, specific information was gathered regarding disability status. Eight households (19%) reported having at least one household member with a disability, totaling nine individuals. Of these, eight people have a physical disability, and one person has a mental disability. The ages of the affected individuals range from 7 to 72 years, indicating that both children and elderly household members are affected. In four of the eight households, the person with a disability receives a disability pension from the local government.

When asked about common health issues affecting their households or communities, PAPs most frequently reported acute respiratory diseases (e.g., influenza, colds), followed by cardiovascular diseases, endocrine conditions such as diabetes, and gastrointestinal disorders. Other conditions mentioned included anemia, nervous system and gynecological diseases, and cancers. A small number of PAPs also mentioned asthma, eye pain, high blood pressure, and opisthorchiasis (a parasitic disease caused by liver flukes) under the “other” category.

These findings are consistent with regional trends, where non-communicable diseases remain prevalent due to diet, stress, and limited preventative care. A summary is provided in Table 11 below.

Table 11: Common diseases as reported by PAPs

Category of common diseases	Frequency of observation
Acute respiratory diseases (influenza, colds)	27%
Cardiovascular diseases (heart disease)	21%
Endocrine diseases	14%
Gastrointestinal diseases (gastritis, cirrhosis, peptic ulcer)	10%
Anemia	7%
Nervous system disorders	5%
Genitourinary/gynecological diseases	5%
Oncological diseases/cancers	3%
Infectious diseases (jaundice, tuberculosis)	0%
Other (e.g., asthma, eye pain, etc.)	8%

Note: PAPs were able to select more than one option.

5.5 Accommodation and living conditions

Most households in the AOI survey respondents own their homes and associated plots of land. Homes are typically single-family houses with access to a yard or garden. Basic infrastructure such as water, electricity, and gas are generally available, although the reliability and quality vary by location.

The data shows that 90.5% of PAP households live in privately owned accommodation, 7.1% occupy homes provided by their workplaces, and 2.4% rent their housing. This mirrors the general trend seen in the full Aol survey (where 88.5% own their homes) but shows slightly higher private ownership rates among PAPs.

Table 12: Housing ownership among PAP households by ayil

Surveyed zone	Allocated by Work	Private house	Rented house	Total
Balykchy	1 (100%)	0	0	1 (100%)
Cholok	1 (20%)	4 (80%)	0	5 (100%)
Jil-Aryk	0	1 (100%)	0	1 (100%)
Kok-Moynok 1	1 (8.3%)	11 (91.7%)	0	12 (100%)
Kok-Moynok 2	0	6 (100%)	0	6 (100%)
Kyz-Kiya	0	1 (100%)	0	1 (100%)
Kyzyl-Oktabr	0	4 (100%)	0	4 (100%)
Orlovka	0	3 (100%)	0	3 (100%)
Other (households along OHTL)	0	8 (88.9%)	1 (11.1%)	9 (100%)
Total	3 (7.1%)	38 (90.5%)	1 (2.4%)	42 (100%)

In 88.1% of cases, PAP houses are owned by men, only 11.9% of houses are owned by women. A total of 90.5% of households reported that they live in their houses all year-around. However, in Orlovka (66.7% of PAP households in the ayil) and some 'households along the OHTL' (22.2% of PAP households) reported living in their current houses only for several months. They said that they own other houses in Bishkek, Kemin district, Orlovka cities.

The most widely available assets owned by PAH are mobile phones (100%), washing machines (85.7%), and televisions (81%), which suggests widespread access to basic utilities and information. However, ownership of cars (21.4%), greenhouses (2.4%), and motorbikes (2.4%) is low. Notably, no PAH reported having air conditioning.

Table 13: Main household assets of PAPs

Asset	% of PAH that own assets
Car	21.4%
TV	81.0%
Satellite dish	35.7%
Washing machine	85.7%
Refrigerator	76.2%
Air conditioner	0.0%
Greenhouse	2.4%
Personal computer	19.0%
Mobile phone	100.0%
Motorbike	2.4%
Internet connection	59.5%

Access to utilities

Access to electricity and drinking water is generally available in Aol households. However, 0.2% of monthly household expenses are still spent on the purchase and delivery of water, indicating that direct access remains a challenge in some areas. Most Aol households use wood, coal, or electricity for heating and cooking. Only households from Orlovka have access to centralized heating and centralized sewage and none of the Aol households have access to centralized gas.

Table 14: Percentage of Aol households that have access to centralized water supply

Settlement	Centralized Water Supply
Balykchy	0.0%
Cholok	20.0%
Jil-Aryk	0.0%
Kok-Moynok 1	50.0%
Kok-Moynok 2	66.7%
Kyz-Kiya	0.0%
Kyzyl-Oktabr	75.0%
Orlovka	66.7%
Other (OHTL vicinity)	0.0%

The majority of PAH get their water from centralized water supply (38%), followed by their own groundwater well in their yard. Table 15 provides the different ways that PAPs receive water.

Table 15: PAH water supply

Source	Percent
Centralized water supply	38.0%
Own groundwater well in the yard	19.0%

Water from a spring	16.7%
Pump in own/neighbouring yard	11.9%
From a ditch	4.8%
Water from drainage/collector	2.4%
Water collected from reservoir	2.4%
Water from the Chu River	2.4%
Hand pump	2.4%

Only 38.1% of PAP households have access to state waste collection services, while others burn waste or bury it in pits. In Jil-Aryk, waste is fully taken by the State waste disposal company (100%), as well as in Kyzyl-Oktabr (75%), Orlovka (33.3%), Kok-Moynok 1 (50%) and Kok-Moynok 2 (33.3%). Cholok also partially uses this service (60%). Overall, 38.1% of the PAH rely on State disposal services. In Kok-Moynok 1 (50%) and Kok-Moynok 2 (66.7%), many PAP households manage waste by disposing of it in special pits in their yards. Public waste containers are used in Cholok (20%) and Orlovka (33.3%) - accounting for 7.1% overall. Waste burning is practiced in other households along the OHTL (33.3% each), totalling 7.1% of surveyed PAPs households. Less common methods include transporting waste by car to collection points or partial burning and bin use (2.4% each).

Heating in PAH is almost entirely dependent on solid fuels such as coal (76.2%) and dry manure (21.4%), with very limited access to centralized heating (2.4%). The majority of PAP households use gas in cylinders (47.6%) or electricity (35.7%) for cooking, with a smaller number relying on dry biomass (Table 16).

Table 16: Primary cooking sources

Source	Percent
Gas in cylinders	47.6%
Electricity	35.7%
Dry manure	11.9%
Coal	2.4%
Wood/plant materials	2.4%

While the majority of PAP households reported stable electricity supply year-round, 38.1% face seasonal or continuous instability, and one household (2.4%) lacks electricity entirely. In most cases, electricity is unstable due to wind or accidents. Some households reported they use solar panels for electricity.

5.6 Land use and land tenure

Land in the Aol is used primarily for grazing and small-scale agriculture. Of the PAH surveyed population 69% of households own farms or land plots, typically under 5 hectares. These are used to grow forage crops, potatoes, vegetables, fruits, and grapes. In line with national land tenure practices

in Kyrgyz Republic, most agricultural and pasture lands — including those accessed by non-landowning PAH — are formally state-owned and may be accessed under temporary lease arrangements, often administered through the Pasture Management Departments (PMDs) of local municipalities. The table below presents the PAH ownership of land for agricultural use.

Table 17: PAH ownership of farm or additional land plot

Response	Number of PAH	Percent
Yes	29	69%
No	13	31%
Total	42	100%

Several PAH grow mixed crops, while others rent out their land. One respondent noted that his brother manages the land, so he was unsure of the crops grown. The following table provides an overview of the crops grown by PAH in 2024.

Table 18: Crop combinations cultivated by PAH in 2024

Crop Combination	Number of PAH	Percent
Forage crops	15	35.7%
Fruit trees/grape	3	7.1%
Potato and other vegetables	2	4.8%
Potato and other vegetables/fruit trees/grapes	2	4.8%
Potato and other vegetables/forage crops	1	2.4%
Potato/fruit trees/grape/forage crops/berries	1	2.4%
Fruit trees/forage crops/potato/vegetables/berries	1	2.4%
Rents out land	2	4.8%
No agricultural crops grown	1	2.4%
Land used by brother	1	2.4%
Households that do not own farm or agricultural land plots	13	31.0%
Total	42	100.0%

5.7 Activities undertaken on the Project land

A total of 51% of AOI households reported using land within the OHTL Right of Way (RoW), primarily for grazing (61%), with smaller portions using it for as transit routes. Usage is mostly seasonal. The Project is expected to have temporary impacts on land access, particularly during construction phases.

All PAPs reported that they use the land located under the ROW of the OHTL.

The vast majority of households (95.2%) use the land informally for grazing livestock. A small number of respondents reported using the land for farming (2.4%), and another 2.4% stated that they use it simply to pass through.

PAH primarily own sheep and goats, followed by poultry, cattle and a small number of horses. Livestock ownership among PAP households is summarised below (Table 19):

Table 19: Livestock owned by PAP households

Livestock Type	Number of Animals Owned by PAP Households
Cows and bulls	396
Lambs and goats	3967
Horses	82
Poultry	466

In addition to the livestock owned by the PAP households, broader community-level data shows the importance of grazing across the Aol. The following grazing patterns were identified across the Project area:

- In Kok-Moynok-1, grazing routes are utilised on a year-round basis through a rotational system.
- In Kok-Moynok-2, grazing is typically seasonal, taking place from May to November.
- In Cholok, grazing is also seasonal, with use generally from April to November.

In addition to individual land use, a communal agricultural plot is located in the Deu-10 area of Kok-Moynok 2 village. This land plot is used jointly by 24 households for haymaking (May to October) and livestock grazing during the rest of the year. The majority of these households hold a Certificate of Right to Use Land Share, although in practice the land is used communally and boundaries are flexible.

5.8 Gender

Most households in the Aol (90.8%) are male headed. In agricultural activities, men are primarily responsible (54%), although 33% of households reported shared responsibilities between men and women. Women were more likely to have received higher education than men in the surveyed population.

When AOI respondents were asked about the main problems that women in their household face, they responded strong stigma and gossip that prevent women from speaking openly about personal issues in society, limited job opportunities, and limited options for well-paid employment in the workplace.

There is one female headed households in the PAP survey group. For those households that are male headed, the majority of the spouses are home makers (27.8%) and pensioners (36%). In the case of the female headed household the spouse of the household head is employed by the government.

A total of 94 members of the PAH are considered to be dependents, either under the age of 18 or over the age of 60. These people are more likely to be looked after by female members of the PAH.

5.9 Poverty and vulnerability

The Aol includes significant numbers of vulnerable individuals. In Kok-Moynok and Kyzyl-Oktyabr ayil okmotus, over 300 individuals were identified as living with disabilities. Around 13.7% of households receive poverty benefits. Vulnerable households include the elderly, single-parent families, the unemployed, and those living in difficult conditions. These groups may be disproportionately affected by land acquisition and construction impacts.

Among the 42 probable PAP households, the following distinct vulnerabilities were identified:

- 9 individuals (across 8 households) were reported to have disabilities (8 physical, 1 mental). Four of those 8 households receive disability pensions from the state.
- 6 PAP households receive state poverty benefits, of which:
 - 4 households include a member with a disability, 3 of those households also receive a disability pension.

In addition, 15.2% of all PAP household members (30 individuals out of 197) are aged 61 and above, indicating age-related vulnerability within the affected population.

Each of these categories is considered independently, as overlapping vulnerabilities may compound the level of risk but should not obscure the presence of individual vulnerabilities. These groups will be prioritised in the development of entitlements and support measures in accordance with EBRD PR 5.

6 Affected people and assets

The following entities have been identified as potentially impacted by the Project:

- The Municipalities (ayil okmotu) (for land that is not pastureland and the rights of way of the EM11 highway and Chu River);
- Pastureland Management Departments of the Municipality (that manage pastureland)
- State Forest Fund (SFF) owned by Balykchy Forestry Enterprise
- Local communities and communal land users
- Herders (under land use contracts with PMDs and also those using the land unofficially)
- Herb and plant collectors.

The following sections provide additional information on which of these impacts are expected to occur as a result of the Project.

6.1 The Municipality

The three municipalities are the official landowners of the majority of the impacted land, however, as they are government entities, there is not expected to be significant negative impact on the municipalities as a result of the Project. The land under the OHTL towers will need to be acquired (or transferred) and compensated for the construction of the Project. For the land of the RoW the Project will require access rights, permits, and compensation for any restrictions on use of state or municipal land, including pastureland. Compensation for these restrictions will be completed per national legislation (pastureland and State forestry land is discussed separately in the sections below).

6.1.1 Local infrastructure

The OHTL route will cross and interact with several types of local infrastructure, which may be temporarily or permanently affected during construction. These include:

Roads: The alignment will cross unsealed local roads and pasture access routes used by herders and farmers, as well as the EM11 international road (Bishkek–Balykchy–Naryn–Torugart, Technical Category II). According to the Ministry of Transport and Communications, the EM11 road has a right of way of 16m from the road axis, with an additional 40m roadside protection zone on each side. Oversized or overweight transport will require a special permit from the relevant territorial office of the Ministry of Transport and Communications.

In addition, the alignment crosses the EM23 regional road, which provides access to Kok-Moynok-2 village.

Chu River: The OHTL crosses the Chu River. No towers will be placed directly within the riverbed; however, the alignment passes through the designated 150 m health protection zone of the river. The Kemin District Water Management Department has confirmed that construction is permitted provided that works do not disturb the riverbed or affect its hydraulic capacity, and that all relevant national legislation is followed. This includes compliance with the Law of the Kyrgyz Republic on Water, the Water Code of the Kyrgyz Republic, and Government Resolution No. 271 of 7 July 1995. Required permits and approvals will be obtained prior to construction, and mitigation measures will be implemented.

Potential other infrastructure: Additional local infrastructure, such as irrigation channels, water supply systems, or underground utilities, may be present within the Right of Way. These will be identified through detailed field surveys prior to construction, and any necessary mitigation will be implemented in line with national legislation and EBRD Performance Requirements.

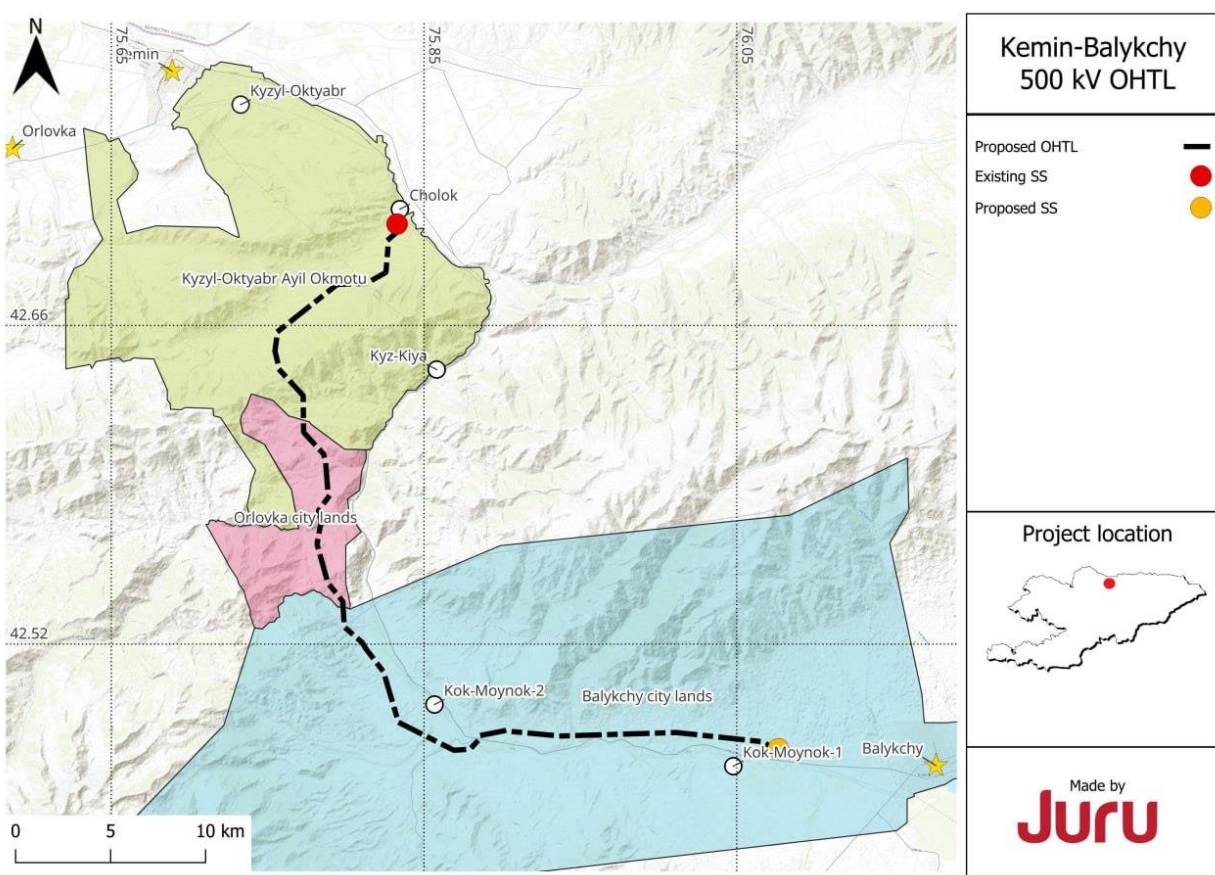
6.2 Pastureland Management Departments (PMD)

The route passes through areas regulated by the pastureland management departments of three local municipalities (Figure 13):

- Balykchy City
- Orlovka City
- Kyzyl-Oktyabr Ayil Okmotu

These departments are the responsible authorities under local governments for overseeing the allocation, planning, and seasonal regulation of pastureland use.

Figure 13: Administrative Boundaries of Pastureland Management Departments



In the Kyrgyz Republic, all pasturelands are state-owned and administered under a decentralized system of community-based pasture management. Each municipality or ayil okmotu has a pastureland management department, which allocates seasonal access, coordinates rotational use, collects pasture fees, and supports sustainable grazing practices.

The PMDs of all three affected municipalities are responsible for:

- Allocating grazing quotas to local livestock owners;
- Coordinating seasonal use and pasture rotation to prevent overgrazing;
- Collecting pasture use fees, which are set independently by each municipality, based on local conditions, animal type, and seasonal demand; and
- Representing pasture users in engagement with external projects and resolving disputes over access and boundaries.

The PMDs receive money from the herders based on the number and type of livestock that they have, not the size of pastures they use. Therefore, if the Project does not result in herders reducing the number of livestock, they herd, there will be no loss of income from the department.

NEGK, Local municipalities and their Pastureland Management Departments are all government organizations, and therefore the land acquisition process between these entities will necessarily follow the applicable national legislation. NEGK will undertake a review of the legal requirements for payments to the PMDs to make sure they are in compliance with EBDR PR5.

6.3 State Forest Fund (SFF)

A portion of the Project alignment crosses land belonging to the State Forest Fund (SFF), specifically under the management of the Balykchy Forestry Enterprise, as confirmed by the official response from the Forestry Service of the Ministry of Emergency Situations of the Kyrgyz Republic.

According to the Forestry Service, there is no public infrastructure located within the affected SFF lands. Part of this land is subject to a long-term lease agreement with a private company for landscaping activities, covering an area of approximately 20 hectares. At this stage, it is not yet confirmed whether the OHTL alignment will directly cross this leased land. Further consultations with the Balykchy Forestry Enterprise will be required to determine the exact boundaries of the lease area in relation to the Project alignment.

Compensation for any temporary loss of use or restrictions on SFF land, and any impacts on the lessee, are expected to follow the provisions of the Forestry Code of the Kyrgyz Republic and applicable national legal procedures (see section 3.1.4).

6.4 Kyrgyz Railways (Kyrgyz Temir Jolu)

The alignment crosses the railway line once, near Kok-Moynok-2 village. The State Enterprise Kyrgyz Temir Jolu has confirmed that a joint site inspection must be organised between the railway company and the Project representatives, with appropriate documentation prepared to formalise agreements for safe construction and operation at this crossing. The railway authority has expressed readiness to cooperate with the Project. It is expected that one tower will be constructed on Kyrgyz Railway land, for which the land will need to be acquired (or transferred) and

compensated. There may also be temporary impacts as a result of the clearing of the RoW and stringing of the OHTL.

6.5 Herders

The following information has been identified on the herders that use the land along the Project alignment:

- Most herders are year-round users, maintaining flocks throughout the winter and summer seasons.
- A portion are seasonal herders, practice transhumance between higher summer pastures and lower winter zones.
- Approximately 72 herders have verified contact details available for further engagement.
- A small number of unofficial or unregistered herders also graze in these areas and will need to be identified during the following studies.

Livestock primarily includes sheep, cattle, and goats. Grazing is typically done on a rotational basis and follows annual quotas determined by the pasture committee based on rangeland conditions.

Although these individuals are commonly referred to as herders, under local administrative and legal classification, all pasture users are considered farmers within the *ayil aimak*. These pasture-user farmers typically sign lease agreements with the Municipal Pasture Management Department (PMD). Lease terms are usually for 1 to 3 years, consistent with national legislation and local pasture governance practices. The variation in pasture tariffs between the different PMDs means that economic impacts may differ slightly across jurisdictions, depending on how herders are charged and the degree of access loss they experience.

Some vulnerable groups are likely present among the herders and pasture-user farmers, including households with elderly members, people with disabilities, and those receiving poverty benefits. In addition, some unofficial or unregistered herders may face greater economic vulnerability. Detailed socio-economic surveys during the next stage will confirm the number and profile of vulnerable households.

6.6 Local communities and communal land users

Some areas of land are used communally by local communities. Herders take turns to graze animals that belong to the different members of the community. Project activities could impact the area available for grazing (if impacted by the construction of an OHTL tower, and also may restrict access to grazing lands, during construction).

Some areas along the Project alignment consist of privately owned land plots, where individual land users hold formal Certificates of Right to Use Land Share. These land plots are legally designated for haymaking, with grazing prohibited during the haymaking season (from May to October).

In practice, however, land users manage the area communally — using the land jointly for hay production and sharing access for livestock grazing outside of the haymaking season. While individual land plot boundaries exist on paper, in reality, land is used flexibly and without strict respect for individual plot lines.

Project activities may impact these lands in three ways:

- Permanent loss of land area — where a transmission tower is built on such land;
- Temporary restriction of access — during construction activities; and
- Loss of crops and trees on the land – during clearing of the RoW.

These impacts may reduce the availability of both hay and pasture for local users.

A small amount of use of medicinal plants was identified from households in Kok-Moynok 1, it is unlikely that the Project RoW will significantly impact the collection of medicinal plants. However, this may be identified once the Project design has been finalized.

6.7 Scope of economic displacement

The Project is expected to result in economic displacement due to both permanent and temporary restrictions on access to pasturelands. No physical displacement or loss of residential structures is anticipated. The extent of economic displacement will depend on the final placement of OHTL towers, the Balykchy SS and its access road and temporary access needs, and construction activities within community-managed pasturelands.

At present, 92 herder households have been identified as using the affected pasturelands. This figure will be refined and verified through the census and socioeconomic surveys. The final number of PAPs and the scale of displacement will be used to develop eligibility criteria and entitlements under the Livelihood Restoration Plan (LRP), in accordance with EBRD Performance Requirement 5.

7 Key compensation and assistance principles

Compensation principles should be based on rules prescribed by local legislation as well as requirements indicated in PR5. The following sections provide an overview of the process by which, compensation will be paid for this Project.

7.1 Land acquisition process

NEGK, local municipalities, and their respective Pastureland Management Departments are all government entities. The land affected by the Project is predominantly state-owned or municipally managed land (including pastureland and State Forest Fund land).

The Project is not expected to require formal "acquisition" of land from state entities or municipalities. It is expected that these lands will remain state property, but usage rights (including lease rights or pasture use) may be temporarily or permanently restricted by the Project. In such cases, appropriate compensation or mitigation measures will be applied — in line with both national legislation and EBRD Performance Requirement 5.

As the Project Developer, NEGK will be responsible for overseeing and coordinating the land acquisition process through the establishment of an Interagency Commission. This initiative will be pursued in close collaboration with the relevant state and local authorities, including the Mayor's Offices of Balykchy and Orlovka cities, the Kyzyl-Oktyabr Ayil Okmotu, and the Pastureland Management Departments operating under these jurisdictions.

There are impacts, particularly impacts on PAPs without leases/contracts, or with impacts that are not compensated under national legislation, which will exclusively follow the EBRD requirements. No land will be handed over to the contractors for commencement of construction until the land acquisition process has been completed and all compensation payments have been made. Contractors will not be able to start work until EBRD has certified that the LRP implementation has been undertaken in line with PR5.

7.1.1 Government requirements

Kyrgyz national legislation provides the legal basis for land acquisition and compensation. Key principles include:

- Land may be acquired for state or public purposes only through a court decision or voluntary agreement, with prior and full compensation (Land Code Art. 68; Civil Code Art. 233-17).
- Compensation must reflect the market value of land and any associated losses, including early termination of leases, relocation costs, and lost income (Civil Code Art. 14–15).
- Where feasible, land-for-land replacement may be offered as an alternative to cash compensation.
- All legal landowners and registered leaseholders are entitled to compensation. However, informal or unregistered users are generally not covered by national legislation and may require support under international safeguards.
- Servitude rights may be established voluntarily or imposed by competent authorities, with compensation based on reduced land use, productivity loss, or other impacts.

As part of the land acquisition process, NEGK will compile and present a comprehensive documentation package to the relevant local authorities — including Mayor's Offices, Ayil Okmotus, and Pastureland Management Departments. This package will include:

- Verified maps of affected land plots
- Ownership and land-use information
- Asset valuation summaries
- Draft compensation entitlements

The purpose of this presentation is to ensure transparency, institutional coordination, and compliance with both national and EBRD standards. It will also allow local stakeholders to confirm the legal and factual basis of land acquisition and help coordinate compensation agreements with affected persons.

In cases where privately owned land is required for the Project (for example, privately held hayfields used communally — see Section 6.6), it is essential to conduct a cadastral valuation to determine compensation. In accordance with Article 68 of the Land Code of the Kyrgyz Republic⁸, compensation must reflect the market value of the affected land. Valuation is conducted by independent certified appraisers or licensed valuation organisations, in line with the Law on Valuation Activities⁹ and the relevant valuation regulations approved by the State Property Management Fund of the Kyrgyz Republic. The valuation methodology includes best-use analysis and an income-based approach, considering project-related factors and the characteristics of the land.

In the case of municipally managed pastureland or State Forest Fund (SFF) land, formal cadastral valuation is not typically required. Compensation in these cases will be based on the applicable national legal provisions and administrative practice, taking into account loss of use or loss of municipal revenue from land leases or pasture fees. This principle was confirmed through consultations with the relevant municipal and sectoral authorities.

Table 20 provides a description of the Kyrgyz national process for land expropriation.

⁸ Land Code of the Kyrgyz Republic, No. 45, adopted on 2 June 1999 (as amended), Article 68 — "Acquisition of land for state or municipal needs."

⁹ Law of the Kyrgyz Republic "On Valuation Activities", No. 162, adopted on 17 July 2017.

Table 20: Kyrgyz land expropriation process

Stage I. Establishment of the Interagency Commission for Implementation of Land Acquisition Procedures		
Steps	Actions	Expected results and documents
1.	<p>In accordance with the project obligations, the Land Acquisition Initiator¹ makes a decision to approve the "Regulation on the Procedure and Conditions for Acquisition (Buyout) of Land Plots for the Construction of the Balykchy-Kemin High-Voltage Transmission Line", determines the composition of the Interagency Commission for implementation of the land acquisition procedure (hereinafter — the Commission), and instructs the development of a draft Land Acquisition Plan.</p> <p><i>¹Note: The right of state ownership of land is exercised by the Cabinet of Ministers of the Kyrgyz Republic across the entire territory of the republic, and by local state administrations (i.e., district state administrations — akimiats, hereinafter district state administrations) within the competence established by the Land Code of the Kyrgyz Republic (Article 4 of the Land Code). Therefore, the district state administration is entitled to initiate the provision and acquisition of land plots for the Project construction (hereinafter Land Acquisition Initiator). Project implementation will take place within the territories of two district state administrations: Ton District of Issyk-Kul Region and Kemin District of Chuy Region. Therefore, it is advisable to establish two Interagency Commissions for implementation of the land acquisition procedure in the respective territories</i></p>	<ul style="list-style-type: none"> • Order approving the "Regulation on the Procedure and Conditions for Acquisition (Buyout) of Land Plots for the Construction of the Balykchy-Kemin High-Voltage Transmission Line"² (hereinafter — Land Acquisition Regulation) • Approved composition of the Interagency Commission³ • Instruction for the development of the Land Acquisition Plan <p><i>²Note: EBRD Resettlement and Land Acquisition Policy, and Grievance Mechanism, may be approved by this order or the principles of the EBRD policies may be incorporated into the above-mentioned Regulation.</i></p> <p><i>³Note: If there is a Land Commission under the district state administration, it may, if necessary, be granted authority to consider land acquisition matters.</i></p>
2.	<p>Meetings of the Commission aimed at discussing and adopting:</p> <ul style="list-style-type: none"> • the rules of procedure for handling issues related to allocation and acquisition of land plots for the Project construction. 	<p>Rules of procedure of the Commission</p> <p>Defined functions of Commission members</p>

	<ul style="list-style-type: none"> the functions of Commission members within the scope of their authority 	
Stage II. Information Gathering and Development of the Land Acquisition Plan		
3	The Commission sends requests to the relevant territorial authorized state bodies for information on landowners and land users, as well as the legal status of land plots planned for the construction of the Project.	<p>Official information requested:</p> <ul style="list-style-type: none"> on landowners and land users (certificate/information from local registration authorities on land rights holders); on the legal status of land plots along the OHTL route; on the legal status of land plots along the substation; on restrictions for the construction of the Project; on existing violations and potential site-specific risks.
4	<p>For the development of the Land Acquisition Plan, all state bodies and local self-government bodies (hereinafter - LSG bodies) that are members of the Commission:</p> <ul style="list-style-type: none"> provide the Commission with information within their areas of responsibility; participate in the inspection of real estate objects planned for acquisition, and other related activities. 	A database is created containing information on landowners and land users, as well as on land plots and real estate objects located on land plots subject to acquisition.
5	Meetings of the Commission are held to coordinate the scheme and route of the Project construction with interested legal entities and individuals for individual sections, for inclusion in the Land Acquisition Plan.	The sequence of construction of individual facilities is determined, taking into account potential judicial procedures for land acquisition and the need for a decision by the Cabinet of Ministers of the Kyrgyz Republic.
6	Meetings of the Commission are held to discuss and adopt the draft Land Acquisition Plan for the construction of the Project.	<p>Outputs:</p> <ul style="list-style-type: none"> Minutes of the Commission meeting Draft Land Acquisition Plan
Stage III. Disclosure and Public Hearings		
7	Upon completion of the draft Land Acquisition Plan, the Commission approves it and submits it for public consultation by publishing it at the location of the property (local radio, TV, the official website of the Land Acquisition Initiator), and by placing it on information boards in	The draft Land Acquisition Plan is disclosed through local media to inform land rights holders and the local population residing within the area of the land subject to acquisition.

	public places within the settlement where the property subject to acquisition is located.	
8	The Land Acquisition Initiator organizes public hearings on the draft Land Acquisition Plan approved by the Commission; with the mandatory participation of potential individuals whose property is planned to be acquired for public needs.	Minutes of the Public Hearings on the draft Land Acquisition Plan approved by the Commission
9	The Land Acquisition Initiator sends a written Notification of the upcoming acquisition to land rights holders. This notification is delivered to them personally or sent by registered mail with delivery confirmation on paper.	Distribution/delivery of notifications of the upcoming acquisition to land rights holders
Stage IV. Agreement on the Scheme/Route of Construction with Interested Legal Entities and Individuals		
10	The Commission considers the submitted proposals and, if appropriate, makes amendments to the Land Acquisition Plan. The revised draft Land Acquisition Plan is approved at a Commission meeting and submitted to the Land Acquisition Initiator.	Revised draft Land Acquisition Plan approved at the Commission meeting
11	The Land Acquisition Initiator makes a decision to conduct a valuation of the land plots to be acquired, taking into account losses associated with the early termination of land rights.	Independent appraisers are engaged.
12	A valuation of the land plots to be acquired is conducted, taking into account losses associated with the early termination of land rights.	Calculation of the buyout price of land plots ⁴ <i>⁴Note: The calculation of the buyout price of a land plot includes the market value of the right to the land plot and of any buildings and structures located on it, as well as losses incurred by the owner or land user due to termination of land rights, including losses related to early termination of obligations to third parties and evidence of compensation payment to the landowner or transfer of the amount to their bank account.</i>
Stage V. Approval of the Land Acquisition Plan Considering Negotiations with Project-Affected Persons		

13	The Land Acquisition Initiator has the right, based on the results of the public hearings, to make amendments to the Land Acquisition Regulation and Land Acquisition Plan, and to approve an alternative version of the land and property location scheme planned for acquisition. This may be done on the basis of proposals submitted by rights holders of alternative designs (plans, schemes) for the location of the property, with the aim of ensuring the protection of public interests and minimizing damage to the livelihood sources of all potentially affected persons.	Approved Land Acquisition Regulation Approved Land Acquisition Plan
Stage VI-I. Conclusion of the Agreement on Land Acquisition through Buyout or Land Exchange.		
14	Authorized representatives conduct negotiations with landowners and land users of the land plots planned for the construction of the Project regarding the buyout price, timing, and other terms of the buyout or land exchange.	Minutes of negotiations with landowners and land users
15	If the landowner or land user agrees with the compensation price determined by the appraiser and/or the buyout terms, the authorized body concludes a Land Buyout Agreement with them. The agreement specifies the payment for the land plot acquired for state and municipal needs (buyout price), the immovable property located on it, the timing, and other conditions of the buyout.	Concluded Agreement on Land Acquisition through Buyout Payment of the established compensation to the landowner
16	The demolition of immovable property located on the land plot is carried out on the basis of the land buyout agreement after payment for the land plot, or on the basis of a court decision that has entered into legal force.	Acts of demolition of immovable property located on the land plot
Stage VI-II. Court Consideration of a Claim for Compensated Land/Property Acquisition for State and Public Needs and/or for Establishing the Buyout Price		
17	If the landowner or land user does not agree with the decision on land acquisition, or if no agreement is reached on the buyout price	Court claim for compensated acquisition of property for state and public needs or for establishing the buyout price

	and other terms of the buyout and compensation payment, the Land Acquisition Initiator has the right, within two months, to file a claim in court for compensated acquisition of the property for public needs or for determining the buyout price.	
18	In this case, the buyout price is determined by the court based on a claim filed by the Land Acquisition Initiator for the court to establish the buyout price for the acquired property.	Final and binding court decision on the acquisition of the land plot and property
Stage VII. State Registration of Termination of Ownership Rights and Transfer of Rights to Property in Connection with Its Acquisition for State and Public Needs		
19	<p>The Land Acquisition Initiator, authorized state bodies, and local self-government bodies responsible for processing and issuing title documents for land plots and real estate must, within 5 working days, submit applications and copies of the relevant documents to the local registration authorities at the location of the real estate unit⁵ in both electronic form and hard copy. Hard copies of the documents must be delivered to the local registration authorities either in person or by mail.</p> <p><i>⁵Note: A real estate unit means a land plot, building, structure, apartment, or other property that has established boundaries and is owned or used by individuals, legal entities, or is in state or municipal ownership in accordance with the legislation of the Kyrgyz Republic.</i></p>	<p>Application</p> <p>Title documents (agreement or court decision)</p> <p>Receipt for payment of registration authority services</p> <p>Document containing technical specifications of the real estate unit for entering information on the change of owner.</p>
20	<p>State registration of the termination of ownership rights and transfer of rights to the property in connection with its acquisition for state and public needs</p> <p><i>⁶Note: Lands of power transmission facilities include lands occupied by overhead line towers, underground cables, and service roads intended for their maintenance as provided for in the construction</i></p>	State acts on the right of ownership or use of land plots from the moment the registration enters into legal force, the state recognizes and ensures the protection of registered rights and transactions in accordance with the legislation of the Kyrgyz Republic.

	<i>project of these facilities. Along power lines, protection zones are established for their preservation, maintenance, and safety.</i>	
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7.1.2 EBRD requirements

While national legislation in the Kyrgyz Republic provides a legal framework for the acquisition of land and the provision of compensation to formal landowners and users, it does not fully address all categories of project-affected persons (PAPs) or all types of impacts that may result from involuntary resettlement or restrictions on land use. To ensure that all individuals and communities impacted by the Project are treated equitably, the requirements of the European Bank for Reconstruction and Development (EBRD) Performance Requirement 5 (PR5) will be applied in full.

PR5 establishes the objective of avoiding or minimizing involuntary resettlement wherever possible and requires that, where displacement is unavoidable, affected persons receive compensation and assistance that restores — or improves — their pre-project standard of living and livelihood.

In the context of this Project, the following key provisions of PR5 will be applied in addition to national legal requirements:

- **Compensation for Informal and Unregistered Land Users:** Individuals or households who occupy or use land without legal title or formal lease agreements — including seasonal herders and informal pasture users — are not recognized under national law. However, under PR5, such users are eligible for compensation for lost access and economic displacement, provided they were using the land prior to the cut-off date.
- **Livelihood Restoration:** For PAPs whose income or livelihood is adversely affected by the Project, targeted livelihood restoration assistance will be provided. This may include temporary allowances, fodder support, facilitation of access to alternative grazing lands, or employment opportunities within the Project, depending on the nature and severity of impacts.
- **Support for Vulnerable Groups:** PR5 requires that vulnerable individuals and households — including but not limited to those headed by women, elderly persons, people with disabilities, or those living below the national poverty line — be identified during the resettlement planning process. These groups will receive additional assistance to ensure that they are not disproportionately affected and are able to access their entitlements in full.
- **Compensation Timing and Conditions:** All compensation and assistance must be delivered prior to the commencement of any physical displacement, access restrictions, or construction activity. No land will be transferred to the contractor until compliance with this requirement is verified.
- **Grievance Management and Consultation:** In accordance with PR10, a functioning and accessible grievance mechanism will be established for use by all affected persons. PAPs will be consulted throughout the land acquisition and compensation process and provided with clear information about their entitlements, valuation outcomes, and grievance options.

Through the integration of these safeguards, the Project will ensure that all affected persons — including those not covered under national legislation — are compensated fairly and supported in

restoring their livelihoods in a manner that is socially equitable and consistent with good industry practices.

7.2 Servitude process

For the implementation of the Project, certain land areas will not be permanently acquired but will instead be subject to servitude — the legal right to use land for specific, limited purposes without transferring ownership. This applies primarily to the Sanitary Gap, which extends 30 meters on either side of the OHTL, as well as access roads and areas where ongoing maintenance and operational activities are required.

The establishment of servitude in the Kyrgyz Republic is governed by the Civil Code (Articles 233–237) and the Land Code (Articles 59 and 68). Servitude may be created through mutual agreement with the affected landowner or user, or in the absence of such an agreement, through a decision by a competent court. In both cases, the legal process must be followed, and affected parties are entitled to compensation for any restrictions or losses incurred as a result of the servitude.

NEGK will identify all land plots affected by servitude in coordination with local authorities, including municipal governments, PMDs, and other relevant land administration bodies. This process will include both formal landowners and legal land users, as well as informal users such as herders and seasonal grazers who may not have registered land use rights but rely on the land for livelihood purposes. All identified users will be formally notified and consulted in accordance with EBRD PR5.

Servitude agreements will be negotiated where possible, with terms clearly outlining the purpose and extent of land use restrictions, the duration of the servitude, and the compensation to be provided. These agreements will be legally documented and registered with the appropriate authorities to ensure enforceability and continuity in the event of land ownership transfer. In cases where a voluntary agreement cannot be reached, NEGK may pursue the establishment of servitude through judicial means, in compliance with the provisions of national legislation.

The implementation of servitude arrangements will be monitored and documented, and affected persons will have access to the Project's grievance redress mechanism throughout the process. The Project will ensure that the servitude process is transparent, legally compliant, and aligned with both national law and EBRD standards for fair and inclusive land use practices.

8 Eligibility

Any person or company, whose assets and/or income is affected by the Project, whether permanently or temporarily, and regardless of whether or not they have legal title to the affected land or asset, is eligible to receive compensation and other entitlements. If people or households reside in, occupy or use land needed for the Project prior to a determined cut-off date (that will be

disclosed to all PAPs) then they will be considered resettlement affected and eligible for compensation and entitlements.

The census survey will identify and establish the households that own assets or earn income on land required by the Project. The cut-of-date will be clearly disclosed to PAPs during consultation meetings and during one-on-one interviews for the census survey. Any persons moving into the Project area after the cut-off date will not be entitled for compensation.

The expected Project affected organizations or people are summarized in Table 21 below:

Table 21: Eligibility for compensation for PAPs

Project Affected People/organizations	Eligibility	Notes
K-B OHTL		
The following landowners: <ul style="list-style-type: none"> • Balykchy city • Orlovka city • Kyzyl-Oktyabr ayil okmotu 	These organizations will be affected by the proposed route as it passes through their land, leading to a reduction in the size of their land holdings.	Non-pastureland owned by these entities, as well as the rights of way of local infrastructure will be impacted. They are also in charge of the PMDs.
PMDs of the three local municipalities		Grazing activities are being held by herders of those organizations in the Project areas
State Forest Fund under the Balykchy Forestry Enterprise		
Kyrgyz Railway - State Enterprise Kyrgyz Temir Jolu		Rights of way of railway infrastructure may be impacted.
Local communities and communal land users.	They may be impacted by loss of employment, income or loss of livelihood (this could be as a result of loss of grazing land or livestock).	These impacts may be felt by the entire community, not just the livestock owners
All herders and their employees (if any)		This includes also their families and employees.
Hayfield owners and their employees (if any)	They may be impacted by loss of employment, income or loss of livelihood (this could be as a result of loss of hayfield).	This includes also their families and employees.

9 Entitlement matrix

Table 22 provides an entitlement matrix for different types of Project losses¹⁰. The entitlement matrix also includes provisions for any unanticipated impacts arising during Project implementation. Entitlements have been stated in relation to losses as an affected household (AH) or PAP may be impacted by a number of different types of losses. NEGK will be the responsible party for compensating Project losses. Entitlement matrix should be revised and amended (if necessary) during the LRP preparation.

Table 22: Entitlement matrix (predicted losses and possible unforeseen losses)

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
Land	Agricultural/grazing land	Permanent for placing towers, substation, access road	Landowner (Individual, Municipal or Pastureland, excluding forest fund land and railway land which are covered below)	Monetary compensation based on the full replacement cost for the land OR provision of another land plot of equal size, value and productivity in a comparable location on the basis of "land-for land" compensation Transaction cost, registration fee, related to new plot allotted, will be borne by the Project.
			Leaseholders/ land users with a user permit	Lease of a new land plot for the remaining term of lease term, if this is not possible, then compensation for the loss of lease rights according to the requirements of the national valuation standards.
		Temporary (laydown areas used during construction)	Landowner/ leaseholder	Monthly rent for the use of the land based on a negotiated agreement with the landowner/leaseholder and the Project. The land will be restored to its pre-project condition

¹⁰ Note: This matrix is subject to NEGK's revision.

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
		Either permanent or temporary	Unofficial land users (herders and herder employees)	Compensation for loss of land in terms of loss of income, structures or crops (see sections below)
	Residential land	Permanent for placing towers, substation and access road	Landowner	Another plot of equal size, value and productivity in a comparable location on the basis of "land-for land" compensation, OR if not possible, monetary compensation based on the full replacement cost for the land, or Transaction cost, registration fee, related to new plot allotted, will be borne by the Project.
		Permanent for placing towers, substation and access road	Leaseholders	Lease of a new land plot for the remaining term of lease term, if this is not possible, then compensation for the loss of lease rights according to the requirements of the national valuation standards.
		Temporary (laydown areas used during construction)	Landowner/ leaseholder	Monthly rent for the use of the land based on a negotiated agreement with the land user and the Project.
		Either permanent or temporary	Unofficial land users (herders and herder employees)	See below - Compensation for loss of land in terms of loss of income, structures or crops
	State Forestry Fund Land	Either permanent or temporary	SFF	Compensation in the form of land plot replacement
	Kyrgyz Railway Land	Either permanent or temporary	Kyrgyz Railway	Compensation will be calculated based on the normative (standard) land value, following a methodology set by the Cabinet of Ministers.

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
Servitude	Loss of servitude rights	Permanent	Landowners	<p>A one-off payment for the servitude rights to the land, as per determined through negotiated agreement between the landowner and the Project.</p> <p>Assets/structures that are subject to damage or demolition will be compensated (included as structural losses in unexpected costs below)</p>
Structures	Residential or business structures (not expected at this time)	Permanent	Owners of the structure (irrespective of whether they own the land or have title to the structure)	<p>Replacement cost of structures will be paid at present market value, free of depreciation and including all taxes and transfer fees.</p> <p>Owner will be allowed to take away all salvageable materials free of cost before start of construction.</p> <p>Infrastructure relocation cost will be borne by the Project, or a transportation allowance will be paid.</p> <p>Preferential selection for Project related employment.</p>
	Other structures (potential impacts to the fish farm)	Permanent	Owners of the structure (irrespective of whether they own the land or have title to the structure)	<p>Full replacement cost of structures will be paid at i) fair market value (ii) transaction costs (iii) interest accrued (iv) renovation costs and (v) other payments as applicable., free of depreciation and including all taxes and transfer fees.</p> <p>Owner will be allowed to take away all salvageable materials free of cost before start of construction.</p>

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
Income	Business disruption	Permanent	PMDs for Project Municipalities	Compensation will be required in accordance with national legislation.
		Permanent (if OHTL is rerouted)	Business owners (along the E11 highway and tourism businesses).	Cash compensation equal to net profit for the period of business restoration up to one year.
		Temporary loss or reduction of income as a result of the Project activities (if OHTL is rerouted)	Business owners (along the E11 highway and tourism businesses) and the fish farmer.	The amount of lost profit will be calculated based on the deficit shown with the average monthly income in the past 3 years. The amount of deficit will be multiplied by the number of months of business interruption (up to one year) and provided as cash compensation.
	Loss of grazing land and increased costs to feed animals	Permanent loss or reduction of income as a result of a reduction of usable land	Herders	Compensation of the PAPs salary or minimum wage (whichever is highest) for 6 months or more to be determined by NEGK depending on the level of impact. Preferential selection for Project related employment.
		Temporary loss or reduction of income as a result of the Project activities.		Compensation of the PAPs salary or minimum wage (whichever is highest) for 3 months. Preferential selection for Project related employment.
	Loss of employment/reduced employment	Permanent loss or reduction of income (if OHTL is rerouted)	Herder/farmer employees	Compensation of the PAPs salary (based on official documents or tax returns) or minimum wage (whichever is highest) for 6 months or

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
				more to be determined by NEGK depending on the level of impact. Preferential selection for Project related employment.
		Temporary loss or reduction of income as a result of the Project activities.		Compensation of the PAPs salary (based on official documents or tax returns) or minimum wage (whichever is highest) for 3 months. Preferential selection for Project related employment.
Crops and trees	Crops	Permanent loss	Owner of crops (irrespective of land use rights)	Compensation equivalent to one-year's average net income based on the market value and seeds to replace any lost crops. Owner of the crops will be allowed to harvest free of cost prior to construction.
	Trees	Permanent loss	Owner of productive trees (irrespective of land use rights)	Replacement cost of productive tree sapling and annual cost of production the time it takes for new productive tree to grow (up to 5 years). Owner of the tree will be allowed to cut the tree and keep the wood free of cost prior to construction.
			Owner of non-productive trees (irrespective of land use rights)	Replacement cost of timber tree sapling and compensation for the market rate of the dried wood volume. Owner of the tree will be allowed to cut the tree and keep the wood free of cost prior to construction.

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
	Wild medicinal plants/ herbs	Temporary loss	Persons that collect medicinal plants and herbs (if identified).	Access to livelihood restoration activities.
Community structures and assets	Loss or damage to public (Municipal/State) infrastructure or utilities (i.e., roads, railway, pipelines, transmission lines)	Either permanent or temporary	Municipality/State, and affected communities	No compensation for land. Rehabilitation/replacement of affected structures/utilities to pre-Project state.
	Loss of access to communal grazing land	Either permanent or temporary	Affected communities	Livelihood restoration activities identified that benefit all community members or are made available to all members of the impacted group.
Severely affected	Loss of all income from affected plots/business, physical relocation or loss of 10% or more income generating assets	Permanent loss	All affected people. that are severely affected	A rehabilitation allowance of 6 months at national minimum wage.
Vulnerable Households	Additional losses or impacts as a result of vulnerable status.	Either permanent or temporary	Any affected persons found to be vulnerable	A cash allowance equivalent to 6 months per household of the national minimum wage Preferential selection for Project related employment.

Type of Loss	Type of asset	Specifications	Displaced Persons/organisations Entitled Persons	Basis for Compensation Entitlement
Temporary impacts on access	Temporary impact on access to shops, houses and grazing land	Temporary	All affected persons	The contractor will have to ensure access to shops and residences. Access to pastures must be maintained during grazing seasons. Entry to land and houses will be allowed during specific times of construction period through mutual agreement and schedule.
Unanticipated losses	Any other losses	Either permanent or temporary	All affected persons	As per the LRP principles and similar provisions in this entitlement matrix

10 Compensation and assistance

10.1 Compensation for land acquisition

In the Kyrgyz Republic, land may be acquired for state or public purposes only through a court decision or voluntary agreement, with prior and full compensation (Land Code Art. 68; Civil Code Art. 233-17). Compensation must reflect the market value of land and any associated losses, including early termination of leases, relocation costs, and lost income (Civil Code Art. 14–15). Where feasible, land-for-land replacement may be offered as an alternative to cash compensation.

While Kyrgyz legislation covers key aspects of land expropriation, it does not comprehensively address issues such as informal land use, transitional assistance, or livelihood restoration.

The main Project impact will be on permanent land loss while placing towers, substation and access roads, as well as temporary land loss during construction works. EBRD requires that the replacement cost is paid for all Project losses. The replacement cost of land or structures is considered to include (i) fair market value (ii) transaction costs (iii) interest accrued (iv) renovation costs and (v) other payments as applicable. The replacement cost does not take into account the depreciation value of an item, or the salvage of any materials.

NEGK will ensure the applicability of proposed methods for valuing affected land against EBRD requirements. The Project will bridge the difference between compensations calculations provided by government entities and replacement cost of the land by including a “top up” so that compensation reaches replacement rates.

10.2 Methods of valuing affected assets

It is not expected that assets will be affected by construction of the Project, as per the proposed route. However, should they be identified, an independent, licensed valuer will determine the compensation rate for the lost asset. As with land impacts EBRD requires that the replacement cost is paid for lost assets. Asset ownership will be acknowledged, and losses to assets compensation provided, whether the asset owner is the landowner/legal land user, or not.

NEGK will ensure the applicability of proposed methods for valuing affected assets against EBRD requirements. The Project will bridge the difference between compensations calculations provided by government entities and replacement cost of the asset by including a “top up” so that compensation reaches replacement rates.

10.3 Compensation for servitude

Compensation will be provided for any loss of use, loss of income, or inconvenience resulting from the servitude. The compensation amount will be determined by an independent, licensed valuer and will reflect the market value of the loss. In accordance with EBRD requirements, additional support may be provided to informal users or vulnerable groups to ensure that their livelihoods are not adversely affected.

Any losses/damages while obtaining rights for land whether it will be for permanent or temporary land loss will be compensated. Some crops and trees may be impacted within the Sanitary Gap. Those losses are discussed below.

10.4 Crops and trees

There were a small number of crops and trees identified as being impacted by the proposed Project. Impacts on crops and trees will be paid to the owners, whether or not they own the land on which the plants are growing. They will be compensated as follows:

Crops – PAPs will be provided with seeds to replace any lost crops and an allowance equivalent to one-year average net income obtained from the crops, based on the market rate. The market rate will be determined by the independent valuer. The owner of the crops will also be allowed to harvest the crops free of cost prior to construction.

Wood trees – A replacement sapling or the cost of a timber tree sapling will be provided and compensation for the market rate of the dried volume of wood, which will be identified by the valuer. The owner of the tree will be allowed to cut the tree and keep the wood prior to construction.

Productive trees – Replacement sapling or the cost of a productive tree sapling and annual cost of production for the time it takes for new productive tree to grow (up to 5 years), as determined by the valuer. As with wood trees, the owner of the tree will be allowed to cut the tree and keep the wood prior to construction.

10.5 Incomes

Should impacts to PAP incomes be identified during the preparation of the LRP, incomes will be compensated differently depending on the type of PAP. The following information provides income compensation per type of PAP.

PMD – the amount of lost profit will be identified based on the estimated average monthly income in the past three years multiplied by the number of months of business interruption and provided as cash compensation.

Business owners (permanent impacts) – While this impact is not expected at this stage, should impacts to businesses be identified, cash compensation will be provided equal to net profit for the period of business restoration (based on official documents or tax returns) up to one year

Business owners (temporary impacts) – This impact has not been identified at this stage but could potentially be identified for tourism businesses in the area. Should the impact be identified during the LRP preparation, the amount of lost profit will be calculated based on the deficit shown with the average monthly income (based on official documents or tax returns) in the past 3 years. The amount of deficit will be multiplied by the number of months of business interruption (up to one year) and provided as cash compensation.

Herders (permanent impacts) – The amount of compensation paid will be equivalent to the PAPs salary (based on official documents or tax returns) or the Kyrgyz minimum wage (whichever is

highest) for six months or more to be determined by NEGK depending on the level of impact. They will be included in the livelihood restoration activities (as relevant).

Herders (temporary impacts) – Compensation will be provided at the rate of the PAPs salary/income (based on official documents or tax returns) or Kyrgyz minimum wage (whichever is highest) for three months. They will also be included in the livelihood restoration activities (as relevant)

Herder employees (permanent impacts) – This impact is not expected, but should such an impact be identified, the amount of compensation paid will be equivalent to the PAPs salary (based on official documents or tax returns) or Kyrgyz minimum wage (whichever is highest) for six months or more to be determined by NEGK depending on the level of impact. They will also be included in the livelihood restoration activities (as relevant).

Herder employees (temporary impacts) – The amount of compensation paid will be equivalent to the PAPs salary (based on official documents or tax returns) or minimum wage (whichever is highest) for three months. They will also be included in the livelihood restoration activities (as relevant).

10.6 Vulnerable groups and allowances

At the LRP stage it will be necessary to determine (through conducting a socioeconomic survey) if the PAH have any vulnerabilities. Additional support will be provided to vulnerable households. They will receive an additional 6 months' compensation at the rate of the Kyrgyz minimum wage. There may also be some additional in-kind assistance that can be provided to vulnerable PAPs if they are interested, such as assistance in receiving employment opportunities, CV preparation, and/or interview techniques.

Vulnerable PAPs should also receive preferential selection for Project related employment (where relevant). At this stage, of the 42 PAHs interviewed, it was identified that nine PAPs from eight PAH have disabilities, and there are a large number of dependents in the PAH (most of them under the age of 17, but 15.2% of PAH members are aged 61 and above), which could make them vulnerable to land acquisition impacts.

As no physical displacement, or impact to assets has been identified at this stage, it is not expected that transition allowances or transportation allowances will be required for the Project.

11 LRP Implementation schedule

An implementation schedule will be included in the LRP. It will be detailed and time bound and include all key resettlement activities. The Interagency Commission will coordinate the land acquisition process, including public disclosure of the Land Acquisition Plan and public hearings, in accordance with national procedures and EBRD requirements. In addition to the activities described in Section 7.1, the following content should be included in the implementation schedule:

- Community consultations
- LRP disclosure
- Set up and ongoing use of the grievance mechanism
- Detailed design completion
- Inventory of affected land (and assets)
- Compensation assessment by independent valuer
- Preparation of the Land Acquisition Plan
- Public disclosure of the Land Acquisition Plan and public hearings,
- Completion of LRP
- Approval of LRP by EBRD
- Financial close
- Compilation and presentation of comprehensive documentation package to the relevant local authorities
- Disclosure of compensation packages to PAPs
- Payment of compensation and provision of entitlements
- Livelihood restoration activities
- Site demarcation of affected lands
- Start of preliminary works
- Start of main construction works
- Internal and external monitoring

No implementation activities have been started at the time of preparing this LARF, as physical and economic displacement impacts have not yet been confirmed through the completion of Project designs.

12 Livelihood restoration activities

Livelihood restoration activities will be identified to assist PAPs to restore, if not improve their livelihoods to pre-Project levels. The details of the activities will be identified following confirmation of the Project impacts and will be commensurate with the identified impacts. The activities will be developed in consultation with the PAPs. Specific measures will be identified for vulnerable households, as these households may find it more difficult to recover their livelihoods following the implementation of the Project.

One possible method of livelihood restoration is to identify training courses. Interviewed PAPs discussed the potential advantages of participating in Russian or English language training courses, tailoring skills, cooking classes, computer skills and driving courses. Training courses would be identified during the implementation of the LRP through a needs assessment of the participants. Some other potential activities include assistance to access to affordable loans or grants and employment opportunities for local community members, which could be supported by offering vocational training programmes beforehand to help locals meet skill requirements.

For the communities or groups of people impacted through communal land impacts, the Project will identify activities that will benefit all, or most of the community members, such as the construction of an access road or upgrades to a local school, and/or all community members will be eligible to access livelihood restoration activities (in the case of training).

An overall budget for compensation, assistance will be prepared and included in the LRP. The budget will be the responsibility of NEGK.

13 Organizational arrangements

To ensure the effective functioning of the LRP it is important to determine responsible parties and allocate responsibilities between them. As of the writing of this LARF, there are 13 main parties:

- The ESIA Consultant team – Juru;
- Project Implementing Team – NEGK;
- The Lender – EBRD;
- Independent valuer;
- The Mayor's Office of Balykchy city – Landowner;
- The Mayor's Office of Orlovka city – Landowner;
- Kyzyl-Oktyabr Ayil Okmutu – Landowner;
- The Pasturelands Management Department under the Mayor's Office of Balykchy city;
- The Pasturelands Management Department under the Mayor's Office of Orlovka city;
- The Pasturelands Management Department under the Kyzyl-Oktyabr Ayil Okmutu;
- The Cadastral Department of Balykchy city;
- The Cadastral Department of Kemin district; and
- Interagency Commission for Land Acquisition

The responsibilities for each key party are discussed in the sections below.

13.1 Key responsible parties

13.1.1 Juru

Juru will be responsible for the preparation of the LARF (this document) on behalf of NEGK. Juru's responsibilities include:

- assess the current situation;
- identify main PAPs as per suggested route for the OHTL;
- identify main legislation principles for land acquisition and compensation process; and
- identify key stakeholders that should be consulted during the LRP stage.

13.1.2 Project Implementation Team - NEGK

NEGK will take over realisation of land acquisition and livelihood restoration process following the completion of the ESIA phase (some of the responsibilities listed below may be passed on to the EPC Contractor). It will be ultimately responsible for resettlement planning and overseeing the preparation of the LRP or update of this LARF (by a competent third-party consultant). NEGK's responsibilities are outlined below:

- oversee the development of the LRP (using a qualified third-party consultant, if needed);
- conduct meaningful consultations with PAPs and determine their needs and requirements for additional support;
- negotiate with landowners and agree on lease conditions for temporary land acquisition;
- negotiate with PAPs and agree on compensation amounts and arrangements;
- arrange hiring an independent valuer to evaluate the land and other impact to PAPs;

- compile and present a comprehensive documentation package to the relevant local authorities — including Mayor's Offices, Ayil Okmotus, and Pastureland Management Departments
- implement the LRP within the set timelines;
- disclose the compensation calculation with PAPs;
- support the grievance mechanism throughout the LRP process;
- provide payment to PAPs before the commencement of constructional works;
- restore surrounding land after placing towers and completion of construction works; and
- monitor the LRP implementation and provide quarterly monitoring reports to EBRD.

13.1.3 EBRD

EBRD has specific requirements for involuntary resettlement under its loan modalities. It also has disclosure requirements that a Project must comply with. EBRD will also monitor the implementation of involuntary resettlement per its requirements. EBRD's responsibilities are as follows.

- review and approval of provided reports;
- disclosure of final reports on EBRD's website (as relevant); and
- periodically review implementation of the Project.

13.1.4 Independent Valuer

An independent valuer will be engaged by NEGK to conduct land and assets valuation for the Project. This will need to be done to national requirements for the Land Acquisition Plan, and to international requirements for the 'top up' required in the LRP.

13.1.5 The Mayor's Offices of Balykchy city and Orlovka city and Kyzyl-Oktyabr Ayil Okmutu

As the main landowners and government entities that allocate pasture lands with the assistance of its subordinate department, the Pastureland Management Department (PMD), to temporary users (mainly herders), the Mayor's Office will take on the following responsibilities:

- provide alternative land/re-define land lease agreement for affected temporary users if required;
- support NEGK in providing information on activities of the Mayor's Office and its subordinate structures as required to assess the level of impact from Project construction and land acquisition;
- complete all legislative actions and approvals per the requirements of national law; and
- support NEGK in communicating with the PMD and local temporary land users.

13.1.6 The Pasturelands Management Department under the Mayor's Offices of Balykchy city and Orlovka city and the Kyzyl-Oktyabr Ayil Okmutu

These departments play a key role in concluding contracts and interact directly with temporary users of pasture lands. They will take on the following responsibilities:

- provide alternative land/re-define land lease agreement for affected temporary users if required;
- support NEGK in providing information on activities of the PMD as required to assess the level of impact from Project construction and land acquisition; and
- support NEGK in communicating with the local temporary users.

13.1.7 Cadastral Departments of Balykchy City and Kemin District

The Cadastral Departments are responsible for maintaining land records, verifying ownership and land use status, and supporting land mapping activities. Their responsibilities in the Project include:

- verify the legal status of land plots affected by the Project;
- provide official data on landowners, leaseholders, and users to the Interagency Commission;
- support boundary identification and parcel demarcation; and
- collaborate with NEGK, local governments, and the Interagency Commission to update land records where required.

13.1.8 Interagency Commission for Land Acquisition

An Interagency Commission will be established by the relevant local authorities, in line with national legal procedures, to manage the land acquisition process for the Project. The Interagency Commission will take on the following responsibilities:

- coordinate the preparation and disclosure of the Land Acquisition Plan;
- organise and conduct public hearings with affected persons and stakeholders;
- coordinate data collection from local cadastral departments and other relevant bodies;
- coordinate with relevant ministries and local authorities on land acquisition approvals;
- ensure compliance with national legal requirements related to land acquisition and public consultations; and
- oversee formal notifications to affected landowners and users.

14 Time frame

Table 23 provides an overview of the Project timeframes. The preparation and implementation of the LARF and the subsequent LRP is expected to occur during the Pre-mobilization phase, following financial close, but prior to the commencement of construction. Therefore, it is expected that this work will be undertaken in 2026.

Table 23: Current anticipated development schedule (June 2025)

Activity	Date
Project Categorisation	September 2024 (completed)
Scoping	January 2025 (completed)
Consultation on draft ESIA	June 2025 (completed)

Activity	Date
Finalization of the Submission of the draft ESIA	June 2025
EBRD 120-day disclosure period	Mid- July to Mid-October 2025
Finalise ESIA (including public consultation comments and ongoing studies)	October 2025
Financial close	Q4 2025 (immediately after signing)
Pre-mobilisation (finalisation of route corridor, tower micro-siting, planning and design)	Q1 2026
Construction Start	Q1 2026
Construction End	Q1 2027
Expected Lifetime	Approximately 50 years or more

As per requirements of EBRD PR5, as well as national legislation, all PAPs will be compensated before commencement of any site mobilisation works at each Project location.

15 Disclosure of information and consultations

Stakeholder engagement up to the writing of this LARF has been undertaken for the scoping report and the preparation of the ESIA report (see the Stakeholder Engagement Plan (SEP) Volume V for further details). During these meetings and discussions, the potential land acquisition impacts have been discussed as described in the sections below. Consultation on affected land cannot be completed until the final design of the Project has been determined and will be updated in the SEP and elaborated in an LRP at the appropriate time.

15.1 Consultations

As a part of the ESIA preparation for the OHTL, Juru interviewed herders and business owners along proposed OHTL route. Initial identification and interviews with herders and business owners were conducted on 12-14 November 2024 (at the Scoping stage), on 3-11 April 2025 (during the preparation of the ESIA) and again from June 16, 2025 to June 17, 2025 (for the disclosure of the draft ESIA). The aim of consultations was to determine the type of land use and gain a preliminary understanding of the PAPs and the Project's impacts on them.

To date, 92 herder households (both official and unofficial) are reported to use pasturelands crossed by the OHTL route. All identified herders graze livestock close to the proposed OHTL route. A total of 42 PAH were interviewed during the socioeconomic survey for the ESIA (also completed in April 2025), in order to get a better understanding of potential impacts on PAPs.

15.2 Stakeholders

Key stakeholders for the land acquisition and livelihood restoration impacts include:

- Balykchy city ayil okmotu;
- Orlovka city ayil okmotu;
- Kyzyl-Oktyabr ayil okmotu;
- The Pasturelands Management Department under the local municipalities;
- State Forestry Fund
- Kyrgyz Railway
- Cadastral departments;
- Local community leaders;
- Businesses along the Project route, including tourism companies;
- Herders;
- Interested legal entities (if relevant); and
- NGOs or other interested parties (if relevant).

15.3 LRP Disclosure

Consultations will be undertaken to disclose the draft and final LRP to PAPs (see the future engagements in section 15.6 below). They will include meeting with both institutional stakeholders and PAPs (the key institutional stakeholders are listed in the section above).

Compensation packages will be disclosed and discussed with PAPs. During the final disclosure of the compensation packages, both male and female members of the household will be consulted. PAPs will be provided two weeks to review their individual packages. The full LRP will be disclosed on the EBRD and NEGK websites.

15.4 Gender Inclusion

Inclusion of women in consultations, particularly in relation to livelihood restoration impacts will be encouraged. Female facilitators have been available at all events, and will continue to be for future consultations, so that women feel comfortable raising their comments and concerns.

In future consultations, both male and female members of the household will be included. If it is identified that women are not equally participating in these events, further action will be taken, such as female only consultations. Following that, discussions with local governments and household visits can be facilitated if necessary.

15.5 Vulnerable and Marginalised People

Vulnerable peoples have been identified as PAHs with chronic illnesses or disabilities, the elderly, female headed households, and poor households. Attempts have and will continue to be made to include these vulnerable or marginalized groups in LRP discussions.

The PAP's vulnerability status could make it more difficult for PAPs to attend group stakeholder meetings, due to mobility difficulties. Therefore, more personalized forms of engagement (such as individual consultations in-person and by telephone) or using technology (such as via WhatsApp groups) will be required, and/or engagement at specific times. Methods of engagement with vulnerable people will be assessed against risks and consulted with the vulnerable people themselves.

15.6 Future engagement with PAPs

Preparation of the LRP will require consultation with all of the identified stakeholders. It will also require a socioeconomic and census survey (which can be undertaken simultaneously), and disclosure to the PAPs of a cut-off date for compensation and disclosure of the grievance mechanism. This future engagement will be defined in the LRP.

Consultation methodology includes: focus group discussions, public meetings, community discussions, letters and one-on-one interviews with key informants. Consultations have included and will continue to include proactive measures to ensure women are informed about the impacts and their views are incorporated into the preparation of the LRP to the extent possible.

PAPs will continue to be consulted throughout the Project, at key stages, and at a minimum on a monthly basis throughout construction. The following is provided as an example of future engagements, relevant to livelihood restoration (to be confirmed in the LRP).

Table 24: Proposed engagements for livelihood restoration

No	Type of engagement	Stakeholder Group	Planned date
1	Notification of the implementation of the socio-economic survey and census survey	All stakeholder groups, focusing on PAPs, community leaders, and local community members	Q4-2025/Q1 2026
2	Socio economic and census survey	Designated household heads/point of contact (if possible, at least one female family member to attend)	Q4-2025/Q1 2026
3	Notification letter on the census completion and the cut-off date	Designated household heads/point of contact	Q4-2025/Q1 2026
4	Focus group with PAPs to identify the types of livelihood support and opportunities the need.	All PAH, at least one female family member to attend.	Q4-2025/Q1 2026
6	Disclosure of the draft LRP	All PAH, at least one female family member to attend.	Q4-2025/Q1 2026
7	LRP compensation packages disclosure– via face to face consultations.	All PAH, at least one female family member to attend.	Q1 2026
8	LRP compensation packages disclosure, vulnerable groups– as determined by vulnerable PAH	Vulnerable PAH at least one female family member to attend.	Q1 2026
9	LRP compensation focus group meeting - female PAPs	Female PAPs	Q1 2026
10	Consultations with Mayors - face to face meetings to inform them of the upcoming Project activities	Mayors/local government leaders of affected communities,	Q1 2026
11	LRP disclosure – via EBRD and NEGK websites.	All stakeholder groups, focusing on community leaders, and local community members	Q1 2026
12	Notification of upcoming consultation – via phone call, social media or WhatsApp	Designated household heads/point of contact	Two weeks before the payment of compensation
13	Payment of compensation – in person meetings	Designated household heads, and at least one female family member.	Q1 2026

No	Type of engagement	Stakeholder Group	Planned date
14	Notification and implementation of the livelihood restoration training – via phone call or WhatsApp group	Designated household heads, or members of household selected for training.	Two weeks before each training is implemented – expected Q1/Q2 2026
15	Notification of the -start of construction – via phone call or WhatsApp group	Designated household heads/point of contact	Two weeks before the start of construction - expected to be Q1 2026
15	Disclosure of commencement of construction - Public meetings	All stakeholders with specific attention to PAPs, community leaders, and local community members	Prior to commencement of construction (expected to be Q1 2026)
17	Disclosure of commencement of construction – as determined by vulnerable PAH	Vulnerable groups	Prior to commencement of construction (expected to be Q1 2026)
18	Information disclosure – telephone, WhatsApp group, or in-person	All PAPs	At key milestones during construction, but at least monthly
19	Quarterly monitoring – face-to-face meetings with PAPs and local community leaders	All PAH and local government leaders	Quarterly
20	Completion audit – in person consultations.	All PAH and Mahalla/local government leaders	Following the completion of livelihood restoration activities (expected 2027)
21	Disclosure of completion of livelihood restoration activities - Public meetings/in-person consultations	All stakeholders with specific attention to PAPs, community leaders, and local community members	Following the completion of activities and conclusion of the completion audit (expected to be 2027)
22	Disclosure of completion of livelihood restoration activities – as determined by vulnerable PAH	Vulnerable groups	Following the completion of activities and conclusion of the completion audit (expected to be 2027)

For further information on future stakeholder engagement for the entire Project, please see the Stakeholder Engagement Plan (2025).

16 Grievance mechanism

EBRD PR10 requires its Clients to establish an effective grievance mechanism in order to keep communication with stakeholders, i.e., be aware of their concerns, and provide responses to their inquiries. At the Scoping and ESIA stages of the Project, Juru will be responsible of receipt of grievances with assistance from NEGK. However, following the ESIA phase the responsibility for grievance receipt and redress will be entirely the responsibility of NEGK. This includes general community grievances and grievances related to involuntary resettlement activities.

16.1 Grievance reporting and resolution

Grievances can be raised through the following methods:

- directly to Project staff during meetings, or Project site visits;
- via phone calls;
- in written form (text messages via email, mobile applications, written requests etc).

Contact details for each of these methods are included in Section 16.3.

Juru has prepared a grievance form to be used when a grievance is received. The grievance form is provided in Annex B: Project grievance form. The grievance form was prepared based on location, language preferences as well as communication opportunities of identified stakeholders.

16.2 Responsibilities

16.2.1 Juru

During the scoping and ESIA phase, stakeholder engagement is being undertaken by Juru. Therefore, Juru is acting as the main focus point for PAPs to raise grievances from local communities. Any grievances raised will be recorded in the grievance form and logged in the grievance log. NEGK will assist in the resolution of grievances and Juru and/or NEGK will provide a response to the grievance.

Juru will hand over the grievance manager role to NEGK at the end of the ESIA phase.

16.2.2 NEGK

NEGK will identify sufficient staff members to undertake land acquisition and livelihood restoration engagement activities as required in this LARF. These staff members will start once identified and assist Juru in engagement activities. They will then take over engagement activities following the ESIA phase. It is expected that a Community Liaison Officer will be identified by NEGK. This person will be the main point of contact between the Project, PAPs and the local communities.

16.3 Contact details

Contact details of Juru representatives that will be responsible for receipt of grievances during the ESIA stage are provided in Table 25.

Table 25: Juru contact details

Company	Contact Details
Juru	Email: d.avdulov@juru.org Phone: +998 (90) 015-71-92 Email: g.nematullaeva@juru.org Phone: +998 (97) 445-95-04
Juru (Presented by Evidence CA)	Email: Bermet.alieva@gmail.com Phone: +996 551 99 99 84

The current point of contact for NEGK is included in Table 26.

Table 26: NEGK contact details

Company	Contact Details
NEGK – Project Company	Email: 1piunegk@gmail.com Phone: +996 312 67 03 19

16.4 Confidentiality and anonymity

The grievance mechanism will keep strict confidentiality of data, including the personal information of all applicants. At the stage of grievance receipt/registration the complainant will be informed that they can submit a grievance anonymously. Complainants will be informed that some grievances may not be able to be responded to if they are made anonymously.

16.5 Grievance resolution options and response

The approach taken to resolve grievances will depend on the nature, frequency of occurrence and the number of grievances. Upon the receipt of a grievance, by any means of communication, it will be entered into the grievance log to ensure that all raised concerns/inquiries are investigated and addressed. The grievance log is provided in Annex C: Project grievance log.

After receipt and registration of a grievance, an applicant will receive written notification that includes a proposed timeline for the investigation depending on the request and preliminary time of receipt of a response.

Responses will be provided in a language that is suitable for the complainant, i.e., Kyrgyz, or Russian. Juru will be responsible for the receipt and monitoring of grievances during the ESIA phase of the Project and NEGK will be responsible following the ESIA phase. Resolution of the grievance will be communicated to the applicant in written form. In cases where the complainant cannot receive a written response, the complainant will be contacted via phone call and informed of the results of their grievance. Table 27 provides the timeframes for response to grievances.

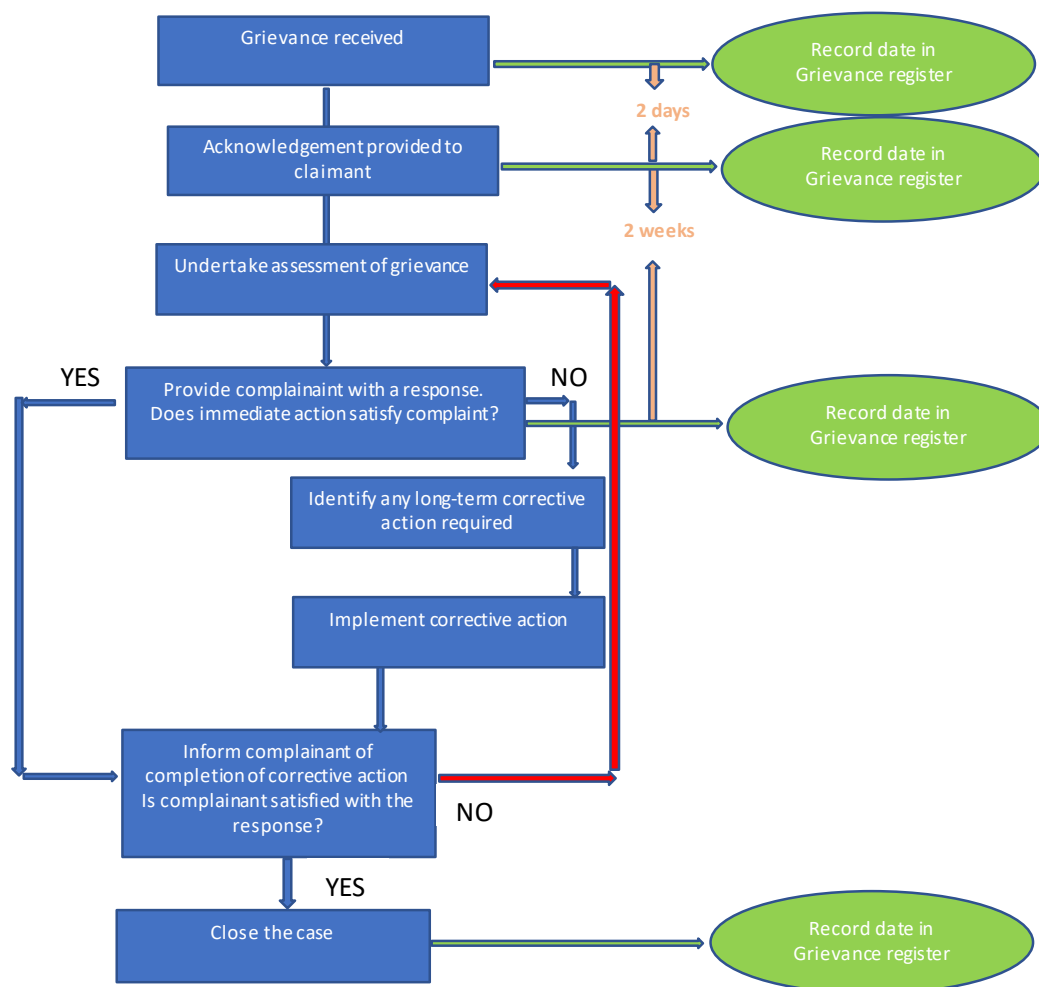
Table 27: Grievance Process and Timeline

Receipt and registration of grievance	-
Receipt and registration of grievance	Day 0-
Providing acknowledgement of grievance receipt to complainant	Maximum three working days after submission of grievance
Assessment/investigation of received grievance	Maximum 30 calendar days after acknowledgement of grievance provided.
Providing complainant with a response	Maximum three working days after assessment has been completed
Reassessment of grievance in case if complainant is not satisfied with previous provide response	Maximum 30 calendar days after notification of dissatisfaction by the complainant

Where complex grievances, or other factors are extending the investigation time, the complainant will be informed of this delay and advised of an updated expected timeline for a response. Figure 14 provides a flow chart of how a grievance can be filed by a PAP.

In cases, when a complainant is not satisfied with proposed solution/response to the grievance, they have the right to take other legal action to resolve the grievance.

Figure 14: Grievance mechanism flow chart



17 Implementation costs

The final budget intended for compensation, monitoring as well as the type of additional support to be provided to PAPs will be included in LRP.

18 Monitoring and reporting

Monitoring will enable the Project to establish continuous communication with PAPs through the grievance mechanism, assess the process of LRP implementation, and ensure the implementation of actions required under national law and EBRD requirements while land acquisition and restoration of livelihoods are being achieved.

The livelihood restoration process will be monitored by NEGK (or the EPC Contractor). There are various activities that require monitoring and reporting as part of this LARF. They are discussed in the following sections.

18.1 Resettlement reporting

Current LARF will be disclosed as part of the ESIA documentation. Following preparation of the LRP, regular monthly internal reporting will be prepared during LRP implementation to disclose livelihood restoration progress. Main indicators will include, but will be not limited to, the following:

- consultations with stakeholders and PAPs. Outcomes of consultations (response letters, MoMs etc);
- compensation paid;
- livelihood restoration activities undertaken; and
- grievances received.

In the following (Table 28) are some examples of key performance indicators (KPIs) that can be provided in the LRP in for tracking livelihood restoration activity on an ongoing basis. These will be refined and updated as part of the LRP preparation.

Table 28: KPIs and targets for livelihood restoration activities

KPI reference	KPI	Target	Data Collection Frequency	Monitoring measure
LRP-01	Funds have been disbursed according to the LRP	100% of funds disbursed	Quarterly	Payment schedules / evidence of payments
LRP-02	All PAPs have received entitlements according to numbers and categories of losses in the entitlement matrix	100% of PAPs have received entitlements	Quarterly	Payment schedules / evidence of payments
LRP-03	Herders are able to herd the same number of animals or more	All herders are able to herd the same number of animals	Quarterly	Socio-economic survey results minutes of meetings/ photos/ attendance sheets
LRP-04	Number of participants in livelihood restoration activities.	At least 70% of eligible PAPs attend activities At least half of these are women	Quarterly	Training logs/ photographs / attendance sheets
LRP-05	Vulnerable households are included in consultation, and livelihood restoration activities.	100% of PAH with vulnerable PAPs have been involved in LRP activities	Quarterly	Attendance sheets, meeting minutes, photos.
LRP-06	Women participate in livelihood restoration activities.	100% of PAH have at least one female member participate in the livelihood restoration activities.	Quarterly	Attendance sheets, meeting minutes, photos.
LRP-07	Number of PAPs know how to use the grievance mechanism	All PAPs report they know how to use grievance mechanism	Semi-annual	Minutes of meetings
LRP-08	Number of grievances that have been satisfactorily resolved.	100% of grievances resolved within timeframe stipulated in grievance mechanism	Quarterly	Grievance log
LRP-09	Grievances and resolutions have been documented	100% of grievances documented	Quarterly	Grievance log
LRP-10	Number of cases that have been taken to court	No cases taken to court	Semi-annual	Legal documents received

KPI reference	KPI	Target	Data Collection Frequency	Monitoring measure
LRP-11	Number of consultations undertaken with PAPs as part of the LRP implementation	Consultations held at least monthly until completion audit.	Quarterly	Meeting minutes, attendance sheets, photos.
LRP-12	Women participate in LRP consultation	At least one female family member per PAH is present during LRP consultations	Quarterly	Meeting minutes, attendance sheets, photos.
LRP-13	Vulnerable households incomes have improved.	100% of vulnerable households incomes have improved.	Quarterly	Survey results, meeting minutes, consultations with vulnerable PAPs.
LRP-14	Vulnerable households have received additional assistance	100% of vulnerable PAPs have received additional assistance.	Quarterly	Meeting minutes, stakeholder engagement logs, photos.
LRP-15	Monitoring reports are completed	100% of reports required in the LRP are undertaken	Annually	Monitoring reports

18.2 Resettlement completion report

Following the completion of LRP implementation an LRP completion report will be prepared which will disclose the process undertaken, any lessons learned and the final outcomes of the livelihood restoration activities. As the level of impact is not significant, it is expected that an external completion audit will not be necessary.

18.3 Grievance logging

Tracking and logging for each grievance should be recorded in a grievance log (Annex C: Project grievance log). Each grievance will be given an individual identification number and followed through by recording details and timing of its resolution and close-out.

Annex A: Resettlement Plan Table of Contents

Introduction	<ul style="list-style-type: none"> • Purpose, scope and content of the plan. • How the plan was prepared and approved and by whom.
Project description	<ul style="list-style-type: none"> • General description of the project and description of the project components and activities that will require land acquisition and cause physical/economic displacement.
Project impacts	<ul style="list-style-type: none"> • Expected project impacts/losses associated with the project components/phases covered by the plan. • Explanation of all activities and alternatives considered to avoid or minimise displacement.
Legal framework	<ul style="list-style-type: none"> ▪ National legal framework (expropriation, land tenure) and provision of resettlement/livelihood restoration assistance). • EBRD requirements. • Gap analysis between national legislation and EBRD requirements and measures to bridge any gaps between them. • If necessary, a more detailed gap analysis addressing the specific legal requirements that pertain to the displacement caused by project components in question.
Affected people and assets	<ul style="list-style-type: none"> • Results of the socio-economic survey and any other tools used, such as focus groups, covering, for example: <ul style="list-style-type: none"> ○ people/households who will be physically displaced and their land ownership status; ○ people/households/businesses who will be economically displaced and their land ownership status; ○ standard characteristics of displaced people/households businesses and baseline information; ○ information on vulnerable groups; ○ social networks and social support systems, and how they will be affected by the project. • Description of affected assets, including natural resources, public infrastructure and services.
Eligibility	<ul style="list-style-type: none"> • Description and results of the census. • Cut-off date for eligibility. • Eligibility of categories of displaced persons for compensation and other resettlement assistance.

Entitlements matrix	<ul style="list-style-type: none"> Entitlements matrix addressing categories of losses and entitlements pertaining to the project components/phases in question.
Compensation and assistance	<ul style="list-style-type: none"> Description of the methodology for valuing losses to determine their replacement cost. Description of compensation and assistance measures. Description of process for executing compensation and assistance. Description of organised resettlement programme (selection of locations, design of housing, planned infrastructure, improvements for host community), if applicable.
Organisational arrangements	<ul style="list-style-type: none"> Procedures for the delivery of entitlements and the roles and responsibilities of all involved agencies/organisations (client, authorities, various service providers), including coordination arrangements.
Time frame	<ul style="list-style-type: none"> Implementation time frame covering all activities from preparation of the plan through implementation, including monitoring and evaluation.
Disclosure of information and consultations	<ul style="list-style-type: none"> Description of engagement activities undertaken as part of developing the plan, its finalisation and approval. Summary of the views expressed and how these were taken into account in preparing the plan. Description of planned stakeholder engagement during implementation.
Grievance mechanism	<ul style="list-style-type: none"> Description of grievance mechanism with contact details of those responsible for grievances for the project component/phase in question.
Monitoring and reporting	<ul style="list-style-type: none"> Description of the internal and external monitoring and evaluation arrangements. Monitoring indicators to measure inputs, outputs, and outcomes for resettlement/livelihood restoration activities. Reporting on implementation of the plan.
Implementation costs	<ul style="list-style-type: none"> Tables presenting expected costs for all resettlement activities and sources of funds.

Annex B: Project grievance form

a) English version

Ref № 1		
1	Name (indicate if compliant preferred to be anonymous)	Full name (if applicable): Gender: Age: Address: Occupation: I wish my identity not to be disclosed:
2	Contact information (Need to specify the way to get back to compliant)	Mob phone: Fax: Email: Other (specify):
3	How compliance/feedback/request was received and by whom	Phone call: Verbal communication: Email: Receiver:
4	Purpose of contact	Make a compliance: Give feedback: Request an information: Other (specify):
	Date of application receipt	Date:
5	Text of message	

6	1st Response message	
7	2nd Response	

b) Kyrgyz version

Ref №1		
1	Аты-жөнү (эгерде шайкеш келүүчү анонимдүү болууну кааласа)	<p>Толук аталышы (эгерде колдонулса):</p> <p>Жынысы:</p> <p>Жашы:</p> <p>Дареги:</p> <p>Кесиптик:</p> <p>Мен өзүмдүн ким экенимди ачыкка чыгарбашымды каалайм:</p>
2	Байланыш маалыматтары (Референдум өткөрүүнүн жолун тактоо зарыл)	<p>Мобилдик телефон:</p> <p>Факс:</p> <p>Электрондук почта:</p> <p>Башка (көрсөтүү):</p>
3	Шайкештик/пикир/өтүнүч кандайча кабыл алынды жана ким тарабынан	<p>Телефон чалуу:</p> <p>Оозеки байланыш:</p> <p>Электрондук почта:</p> <p>Алуучу:</p>
4	Байланыш максаты	<p>Шайкештикти орнотуу:</p> <p>Пикир берүү:</p> <p>Маалымат сураңыз:</p> <p>Башка (көрсөтүү):</p>

	Өтүнмө алуу датасы	Датасы:
5	Билдирүүнүн тексти	
6	1-жооп билдирүү	
7	2-жооп	

Annex C: Project grievance log

ID	Date	Name of Grievant	Contact Details	Preferred Language	Requested Anonymity?	Description of the problem	Responsible Person	Actions to be undertaken	Due date	Results of the Actions	Closing date	Evidence (if applicable)