

Combined Safeguard Plan

Environmental Impact Assessment – Environmental Management Plan
Process Framework on Involuntary Restrictions on Access to Resources
Project Participant Health and Safety
Animal Welfare

CEPF Grant 112609

Tabigat Non-Profit Association

Sustainable Tourism in the Dzungaria Corridor

Kazakhstan

1. **Grantee organization:** Tabigat Non-Profit Association
2. **Grant title:** Sustainable Tourism in the Dzungaria Corridor of Kazakhstan
3. **Grant number:** 112609
4. **Grant amount (US dollars):** approximately \$150,000
5. **Proposed dates of grant:** April 2022 – March 2024
6. **Location (country):** Kazakhstan
7. **Date of preparation of this document:** 1 March 2022

8. Project background

The Dzungaria Corridor, CEPF Priority Corridor 22, crosses the southeastern corner of Kazakhstan into China, near Kazakhstan's Alakol Lake. West of the lake, the land immediately rises to high mountains that form what CEPF calls non-priority KBA 23, Zhongar-Alatau. In Kazakhstan, this area is formally recognized as three contiguous protected areas:

- Zhongar-Alatau National Park
- Lepsinsky State Nature Reserve
- Tokta State Nature Reserve

What CEPF calls Zhongar-Alatau, locally is referred to as Dzungaria Alatau.

All three of these protected areas fall under the control of the Ministry of Ecology, Geology, and Natural Resources / Committee for Forestry and Wildlife; however, only the National Park has meaningful human and financial resources.

This KBA and these mountains are home to snow leopard (CEPF priority species) and the ungulates which it hunts. The ungulates, plus other notable wild species (Turkestan lynx, gray wolf, Tien Shown brown bear, Dzungar argali) draw nature lovers and hunters from Almaty and abroad.

This is a mountainous and relatively unpopulated area. It falls within the Alakol District, which is part of the Almaty region. (The city of Almaty, itself, is 600 kilometers away by road.) Alakol Lake, itself, is a tourist destination for people from Almaty. The road is poor, but improvements are expected by the end of 2022, which will increase the number of visitors. Also, the government is promoting Alakol is one of its "10 Key Tourist Destinations," which will lead to more investment in the area. In the last five years, the number of tourists coming to the region has increased by ten times.

Along the road near these mountains are the small villages of Kokzar, Kabanbay, Dzerzhinskoye, and Glinovka (also called Ush Bulak), each with less than 1,000 inhabitants, or even as few as 50 inhabitants. The Alakol District center is Usharal, about 60 kilometers north of these villages. The people of the four small villages make their living from livestock and small farms. They also hunt, without licenses, in the mountains for meat and hides, both for sale and for personal consumption. Some also work in the hunting-outdoor tourism industry, which is expected to grow with improvement of the road.

There are two hunting reserves within the KBA, wedged between the state nature reserves.

- Zhasylkol
- Tastau

Per laws and regulations, it is illegal to hunt in the nature reserves, and it is only possible to hunt in the hunting reserves with a permit. The state nature reserves and hunting reserves act to limit over-hunting and poaching, but it is not enough.

Snow leopards and overall biodiversity in the region are threatened by overhunting of ungulates. Hunting by local people is driven by poverty and lack of livelihoods, and hunting by people from outside the region is because they see no control on the land and see free opportunity.

The Tabigat Association promotes sustainable tourism and hunting across all of Kazakhstan. We work closely with the managers of Zhasylkol and Tastau, and individual members of the association live in this region. Our project approach is to help the people living in the region by profiting from its natural beauty in a sustainable way, instead of degrading it. The core of our approach solves the problems of low incomes and poaching by promoting horse-based and guided tourism and photo safaris, helping local people to become invested in protecting the environment.

In fact, many local people have already built small cabins and places to stay overnight in these mountains. It is legal to bring people by foot, horse, and ski into these reserves. It is legal to have small cabins and places to keep horses, if built with permission.

The Tabigat project will address these issues with four components:

1. Establish tourism capacity by training local residents in hospitality, creating a cooperative structure that leads to an increase in equestrian tourism, providing basic improvements to mountain huts, and most significantly, providing ten horses suitable for visitors.
2. Raising awareness of the ecological value of the region, raising awareness on laws on hunting, and promoting a “community watch” system that reduces poaching.
3. Collection of baseline data on snow leopards and ungulates.
4. Promotion of this methodology to other Tabigat branches around Kazakhstan.

This approach creates the possibility of negative outcomes that this safeguard plan is designed to mitigate against.

1. Negative environmental consequences of equestrian tourism

- Increased use of trails by horses. In theory, this could lead to the degradation of natural areas.
- Introduction of increased solid and biotic waste from tourists and horses / improper disposal of solid and biotic waste.

2. Negative social consequences from enforcement of existing laws on hunting

- The project will raise awareness on existing laws on hunting and encourage reporting of violations to local law enforcement authorities. In theory, this could lead to people losing sources of livelihoods.

3. Worker health and safety

- Project participants will guide tourists on mountain-based equestrian trips and will assist in wildlife monitoring. In theory, guides, tourists, and wildlife monitors could be injured in the wilderness.

4. Animal welfare

- The project will purchase ten horses for participants to provide to tourists. The animals require proper care and feeding, and they must only be used for project purposes in a humane manner.

9. (EIA-EMP) Status of the area affected

The Dzungaria-Alatau region where the project will take place is uninhabited and mountainous. It is a key biodiversity area for the presence of snow leopards and many other animal species. The project area is 124,000 hectares and goes over parts of three state reserves and two hunting areas. The area is already used by hunters, nature tourists, and local people for cattle grazing. Entering the area on foot or on horseback is legal. Maintaining small cabins or huts for overnight use is legal. There are regulations on hunting: the type of animals, the number of animals that may be taken, the size of the animal taken, the season, the method. The national Committee on Forestry and Wildlife formally oversees the reserves.

10. (EIA-EMP) Approach

We will promote adherence to hunting regulations.

We will encourage residents to lead equestrian tourism and participate in this enterprise as an alternative to over-hunting and illegal hunting.

We will promote the use of horses by tourists and we will promote an increase in the number of tourist visits to existing mountain huts and cabins.

11. (EIA-EMP) Anticipated impact

Promotion of existing hunting regulations and the reduction of illegal hunting will have a **positive** impact on the environment.

It is possible that an increase in the number of horses could cause degradation of trails.

It is possible that humans visiting the area will generate solid and biological waste that is not properly disposed or removed.

It is possible that horses in the area could lead to over-grazing (competing with other animals), more biological waste, and solid waste related to their care and feeding.

12. (EIA-EMP) Mitigation measures

While we are optimistic about the number of visitors, we do not anticipate such a dramatic increase in traffic that there will be significant negative environmental impacts. The people of the region already ride horses on established trails for hunting and to graze livestock. The number of additional “horse trips” over any trail will be marginal. Still, as we establish hut-to-hut routes, we will ensure that particular areas of trail are properly graded to prevent erosion. We will also train the guides to only lead equestrian tourists in areas that are not particularly sensitive for plants and wildlife.

In the locations of the camps/huts/cabins, we will ensure there are proper pit latrines for human biological waste. We will equip the camps with waste containers that are resistant to wildlife and will promote a “leave no trace” approach of “pack it in, pack it out.”

The additional horses in the camps will graze and drink water, but we do not anticipate a noticeable impact beyond what is already present from livestock and horses. Still, we will design the camps to ensure that horses do not go into sensitive areas and we will train the camp hosts to ensure that animal waste is not near streams.

13. (EIA-EMP) Monitoring and evaluation

Andrey Kulagin, Talgat Musin, and Maxim Vaitikhovich will be responsible for ensuring good that the project follows the mitigation plan.

14. (EIA-EMP) Permissions

The authorities of Zhongar-Alatau National Park, under the Committee on Forest and Wildlife, and the managers of the Zhasylkol and Tastau hunting reserves, will be presented with the tourism plan as it is developed and will provide formal permission for the tourism routes and lodging plans.

- Zhongar-Alatau National Park
- Zhasylkol
- Tastau

15. (Process Framework) Participatory implementation

The project area is used by the people of the small villages of Kokzar, Kabanbay, Dzerzhinskoye, and Glinovka (also called Ush Bulak), each with less than 1,000 inhabitants, or even as few as 50 inhabitants. These villages are part of the Alakol District, which is part of the Almaty region. Tabigat has a branch in the Alakol capital of Usharol, about 60 kilometers north of the villages, and there are several individual members of the Tabigat association who live and hunt in the region and who live in these villages. In this sense, Tabigat is a “local” organization.

The project is about establishing an informal, or possibly formal, cooperative of tourist operators that provides an alternative income in place of over-hunting and illegal hunting. The project will involve extensive consultation with the community members. The first task will be to identify 25-30 participants from the villages. The method of selection will be transparent and guided by local village councils. Participants will know from the start that Tabigat will be establishing a form of contract with each person and that each person will be establishing a form of contract with each other. Tabigat, with CEPF resources, will be providing these individuals with inputs (horses, improvements to lodging, equipment)

and they, in turn, must make commitments to Tabigat and the group: care for the horses, data collection from nature observation, reporting instances of poaching, adherence to their own compliance with sustainable hunting, adherence to good tourism practices, and sharing in the costs and benefits of being part of the collective tourism program. Only those willing to agree to these terms will be considered.

During design of this project, we had consultations with the communities, the district authorities, and the managers of the hunting reserve and national park. We received formal endorsement of this proposal from:

- State Administration of the Lepsinsky District, Mayor Kopchikbaev S.Z. 05/01/2022.
- State Administration of Uygenta Forestry, director Bekbaev E.Z. 05/01/22
- Zhongar-Alatau National Park, General Director Kabiev M. 30/12/2021
- Tastau S LLP hunting reserve Tastau, director Kikimov N.N. 30/12/2021
- Hunting and fishing industry Tabigat LLP Deputy Director Taukeeva A . 30/12/2021
- Safari KZ LLP Zhasylkol hunting reserve , director Musin T. 30/12/2021

As the work proceeds, we will engage the people of the villages to design a program that shares in the benefits of the equestrian tourism program, and also the costs of caring for the horses and camps. One commitment will by the people will be to reduce their own illegal hunting and to report poaching violations to local authorities. Reporting, and possible prosecution of fines, can cause tension in a community. Thus, this will only be introduced with complete agreement by the community members. Tabigat will facilitate these discussions in public settings with community leaders.

We will emphasize that we are only promoting adherence to existing laws and regulations on hunting and land use. We will propose to the communities that we follow a plan, described in our full proposal, that follows a model we currently use in the Karakastek hunting reserve that encourages reporting of illegal hunting to state authorized agencies. If a state law enforcement agency makes an arrest based on a citizen report, we will pay cash award based on the severity of the violation.

We will only put this plan into place after community consultation and advance review by CEPF.

16. (Process Framework) Criteria for eligibility of affected persons

Eligible “affected” persons include the people in Kokzar, Kabanbay, Dzerzhinskoye, and Glinovka who use the area for personal hunting, to guide paying hunters and nature tourists, and for the grazing of livestock. The total number of people in these villages is less than 400 households.

17. (Process Framework) Measures to assist the affected persons

Anticipated “effects” are largely about limiting the ability of people to do things they are already not supposed to be doing: hunting in a way that violates existing regulations. People will either voluntarily reduce their illegal hunting, or will stop illegal hunting due to increased enforcement.

Measures to assist the affected people will be:

- Awareness raising about the laws. We will explain the laws to people and provide explanatory pamphlets and signs.
- We will engage the communities, including as many as 30 people from different households in an equestrian tourism business cooperative that creates an alternative income source as opposed to illegal hunting.

The goal will be to make the communities feel like “owners” of the area, where they all benefit from better management of the environment.

18. (Process Framework) Conflict resolution and complaint mechanism

Tabigat will ensure that local stakeholders are aware of the work and understand how to voice complaints if any. We will:

- Post information via 120 x 240 cm banners in Kazakh and Russian in the villages, in district offices in Usharol, in the homes/locations of our field staff, and at the trails/entry points passing through the hunting reserves and state nature reserves.
- Explain our activities at all stakeholder meetings.
- Create fliers about the project’s objectives and planned activities. These fliers will include contact information for Tabigat staff. We will distribute these fliers at all stakeholder meetings.
- Advertise the grievance mechanism on our website and social media.

During all meetings and in general interactions with the public, Tabigat personnel will inform local people and other stakeholders that they have the right to raise a grievance at any time with Tabigat, local authorities, nature reserve personnel, or CEPF about any issue relating to the project. Before starting the project implementation, local communities will be informed of the objectives of the grant. They will be given telephone numbers and e-mails of contact persons at Tabigat, the district government, and CEPF. This information will also be put on all education materials that will be produced during this project implementation including posters, brochures, and booklets. Contact information of the Regional Implementation Team and CEPF will be made publicly available in Kazakh, Russian or Uighyr, as appropriate. If Tabigat receives a grievance, it will communicate the grievance, together with a proposed response, to CEPF and the RIT within 15 days.

We will inform stakeholders that grievances should proceed in the order below. If the stakeholder is unsatisfied with the response at any step, they may proceed further.

- Kazhym Jumaliyev, Project Manager, Tabigat, dkm73@mail.ru, + 77015000404 , 19164295235
- Lina Valdshmit, RIT country coordinator, v.lina78@mail.ru
- Lizza Protas, RIT Team Leader, WWF-Russia, lprotas@wwf.ru
- Conservation International Ethics Hotline: +1-866-294-8674 / secure web portal: <https://secure.ethicspoint.com/domain/media/en/gui/10680/index.html>

19. (Process Framework) Implementation Arrangements

The project will be coordinated from the field site villages in Alakol district. The primary field-facing personnel will be:

- Team Leader: Kazhym Jumaliyev (based in Almaty City)
- Project staff: Andrey Kulagin (based in Alakol District)
- Project staff: Talgat Musin (based in Alakol District)
- Project staff: Maxim Vaitikhovich (based in Alakol District)

20. (Health and Safety) Activities that might cause concern about health and safety

Project participants will be traveling to mountain environments on horseback to guide tourists and to support wildlife monitoring activities. The tourists themselves will be traveling to the mountains. Injuries can occur in remote environments.

21. (Health and Safety) Actions to ensure health and safety

As part of hospitality training – on behalf of the tourists – all guides and lodge hosts will be trained in basic first aid.

As part of the conduct of the project, the managers will ensure that all participants are capable of outdoor work and, for relevant people, the ability to ride and manage horses. There will be first aid kits and cell phones, satellite phones, and two-way radios in case of emergencies.

22. (Animal Welfare) Activities that might cause concern about animal welfare

The project will provide up to ten horses to project participants. The horses will be in the ownership of Tabigat. The horses will be used for tourists to ride into the mountains. These animals need proper care, feeding, veterinarian attention, and proper use.

23. (Animal Welfare) Activities to ensure animal welfare

The people who receive the horses will commit to (1) care and feeding of the horses, (2) humane use of the horses at all times, (3) proper and humane stables, and (4) only using the horses for the purposes of this project -- tourism, guiding, and biological observation. (The horses are not to be used for farm work or personal use.) If the participant violates any of these terms, Tabigat will reassign the horse to a different household and may also seek a financial penalty. Tabigat will ensure that veterinary care is provided.

DISCLAIMER: CI/CEPF review of the health and safety plan and recommended revisions/additions to the actions, budget or monitoring and evaluation do not supersede applicable requirements in occupational and health standards and CI/CEPF does not assume, and specifically disclaims, any duty of care with respect to Grantee and Grantee personnel. Grantee must consult all applicable occupational and health standards when developing this health and safety plan for the Project.