# Social Monitoring Report

# 1 Semestral Report July 2015

ARM: Sustainable Urban Development Investment Program — Tranches 1 and 2

Prepared by the Yerevan Municipality, Yerevan Project Implementation Unit for the Government of Armenia and the Asian Development Bank.

This social monitoring report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

# Semi-annual Social Safeguards Monitoring Report

(January to June 2015)

Armenia: Sustainable Urban Development Investment Program

Tranche 1 and Tranche 2

Project Number: 42417

Loan Number: L2752 (T1)

Prepared: July 2015

Prepared by the Yerevan Municipality

Yerevan Project Implementation Unit

This social monitoring report is a document of the borrower. The views expressed herein do not necessarily represent those of ADB's Board of Directors, Management, or staff, and may be preliminary in nature.

In preparing any country program or strategy, financing any project, or by making any designation of or reference to a particular territory or geographic area in this document, the Asian Development Bank does not intend to make any judgments as to the legal or other status of any territory or area.

#### **ABBREVIATIONS**

ADB - Asian Development Bank

AH - affected households AP - affected persons

DESC - detailed engineering and construction supervision consultant

EA - executing agency

FFA - Framework Financing Agreement

IA - implementing agency

EMA - external monitoring agency

LAR - land acquisition and resettlement

LARF - land acquisition and resettlement framework

LARP - land acquisition and resettlement plan

MOE - Ministry of Economy

MFF - Multi-tranche financing facility
PIU - project implementation unit
PGC - Project Governing Council

PMIC - project management and institutional strengthening consultant

PPTA - project preparatory technical assistance

RS - resettlement specialist

SUDIP - Sustainable Urban Development Investment Program

YM - Yerevan Municipality

## **Table of Contents**

1	Intro	duction	2
	1.1	Objective of the report	2
	1.2	Background Information	2
	1.3	LARF	2
2	Tran	che 1	4
	2.1	Background	4
	2.2	Land Acquisition and Resettlement Plans	5
	2.3 2.3.1 2.3.2	LARP Preparation and Implementation	6
	2.4	Grievance Redress	11
	2.5	Compliance of Loan Covenants Related to Resettlement	12
3	Tran	che 21	15
	3.1	Background1	15
	3.2	Land Acquisition and Resettlement Plans	16
	3.3 3.3.1	LARP Preparation and Implementation	
	3.3.2	LARP for Davtashen-Ashtarak Road Link1	19
	3.3.3	LARPs for Babajanyan-Old Silikyan and Old Silikyan - Ashtarak Road Links2	20
4	Cond	clusion. Lessons Learned and Recommendations for next period	21

#### 1 Introduction

#### 1.1 Objective of the report

1. This Semi-Annual Social Safeguards Monitoring Report for the Sustainable Urban Development Investment Program (SUDIP) of Yerevan Municipality (YM) of the Republic of Armenia (RA) covers the period from January to June 2015. The objective of the report is to provide an overview of the progress made in the implementation of the Land Acquisition and Resettlement (LAR) tasks in the first half of 2015. It provides information on social safeguards activities related to the preparation and implementation of the LARPs. It describes the project's performance in dealing with community consultation and stakeholders' participation, impacted asset registration/records and compensation processes, and grievances received and redressed. The report concerns road development and the social impact mitigation measures of Tranche/Project 1 and LARP preparation of Tranche/Project 2. Lessons learned and the recommendations for the implementation of LAR related activities in the next stage of the program are summarized at the end of the report.

## 1.2 Background Information

- 2. By the Framework Financing Agreement (FFA) dated 24 March 2011 between the RA and Asian Development Bank (ADB), ADB has agreed to provide a multitranche financing facility (MFF) to the RA for the purposes of financing projects and subprojects under the SUDIP. The investment program targets a range of urban connectivity and mobility improvements in all parts of Armenia, aiming to improve transport efficiency, reliability, and safety, and reduce congestion. The program consists of several financial tranches/projects; each of them will include different subprojects. These are rehabilitation or construction of roads, transportation means, urban infrastructures, as well as institutional reforms of Yerevan urban transport and secondary cities of RA.
- 3. The impact of the Program will be the improved urban environment, local economy and enhanced private sector within the urban areas. The outcome will be efficient, reliable and affordable urban infrastructures and urban transport services provided in Armenian cities.
- 4. The loan agreement between the RA and ADB for SUDIP- Tranche/Project 1 was signed on 19 May 2011 for a loan amount of \$48.64 million from ADB's Special Funds resources. Date of Loan Effectiveness is 19 July 2011 and the date of loan closing is 30 June 2016.
- 5. The Government submitted on 16 April 2015 the periodic financing request for Tranche/Project 2, requesting a loan of \$112.97 million from ADB's ordinary capital resources. ADB Management Review Meeting was held on 25 June 2015. ADB provided its initial commitment to provide the loan. Figure 1 below represents the map of Tranche/Project 1 and Tranche/Project 2 locations.
- 6. For the implementation of the MFF the Ministry of Economy (MOE) is designated as the executing agency (EA), and the Yerevan Municipality (YM) as the implementing agency (IA), which will act through "Investing Projects Implementation Unit Building Up of Yerevan" (PIU).

#### 1.3 LARF

7. The LARF for the MFF approved in 2010 was revised and approved on 7 March 2012 (Government decree N 273). The revision accounted for an addendum on methodology for the

compensation of business losses, employment losses and allowances for the vulnerable people. The final LARF and addendum were approved by the Government of Armenia (GoA) in November 2012 (Government decree N 1432).

Dodowy Mister

Address Address

Tranche 2

Tranche 1

Roundabout/ Road junction

Figure 1: Map of Tranche 1 and Tranche 2 locations

8. In order to facilitate LARP preparation and implementation, the area of Tranche/Project1 and Tranche/Project 2 was divided into several sections numbered from S1 to S9 shown in the Table1 and the Figure 2 below.

Table1: Tranche1 and Tranche2 sections

Tranche/Project	Section	Name	Length
	S1	Arshakunyats	1 280 m
Tranche/Project1	S2	New Shirak	
Tranche/Projecti	S3	Artashat	3 200 m
	S4	North South Corridor Interchange	
	S5	Argavand	1 350 m
	S6	Babajanyan-Tichina	2 220 m
Tranche/Project2	S7	Tichina-Old Silikyan	2 060 m
	S8	Old Silikyan - Ashtarak Highway	2 570 m
	S9	Davitashen - Ashtarak Highway	2 400 m

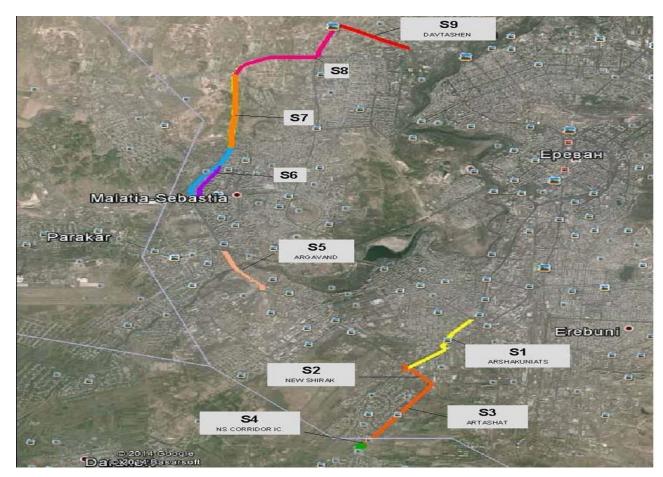


Figure 2: Google map of Tranche1 and Tranche2 sections

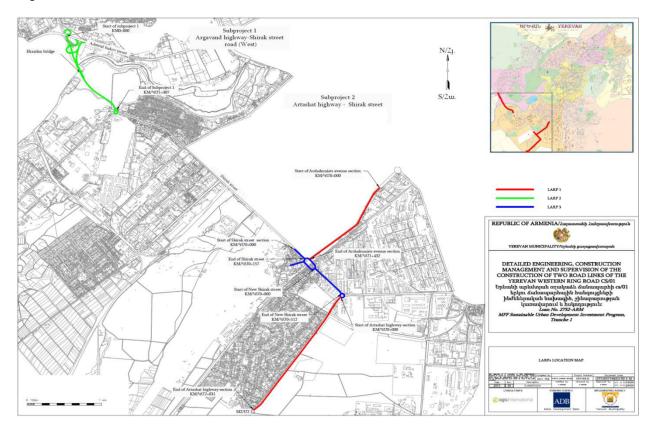
#### 2 Tranche 1

#### 2.1 Background

- 9. The project aims at improvement of urban transport in Yerevan aligned with the urban master plan of Yerevan city and promoting a sustainable, integrated, socially affordable and cost efficient urban transport system.
- 10. Tranche/Project 1 comprises the following components:
  - i. Urban Transport Infrastructure Improvement, including
    - Subproject1 Argawand highway-Shirak street road (West)
    - Subproject2 Artashat highway-Shirak street and Arshakunyats avenue section road (South-West).

- ii. Institutional Strengthening to strengthen institutional framework and urban transport organization, increase coordination, monitoring and financing of urban transport subsector;
- iii. Program Management and Capacity Building: consulting services for subproject preparation, construction supervision, audit, social and environmental assessments, and institutional capacity development in the urban transport sector.
- 11. The Project area is in South-West Yerevan (Shengavit district) about 6 km of the City center. (Figure 3)
- 12. Tranche/Project 1 includes the widening of two main roads, namely Arshakunyats Avenue (1.3km) and Artashat highway (1.5km), and will result in the existing two-lane alignment being widened and converted into a 4-6 lane divided road with a central reservation. A new roundabout connecting Artashat highway to Arshakunyats avenue and Shirak street will be constructed on 8-9m height. The design total length is about 500m. The roundabout will be constructed on the embankment. As the roundabout will be over railway and Noragavit 1st street, two tunnels will be constructed within the embankment in order to allow passing railway and Noragavit 1st street.
- 13. The section that will link Argavand highway and Shirak street West, running a length of approximately 1.3km, has been moved to Tranche/Project 2.
- 2.2 Land Acquisition and Resettlement Plans
- 14. Tranche 1 has been classified as Category A for the involuntary resettlement safeguard of ADB, as the implementation of the Project requires substantial land acquisition and resettlement (LAR) with more than 200 significantly affected persons (AP), losing more than 10% of their income generated assets or being physically displaced from their houses.
- 15. To facilitate the implementation of the LARP for the entire Tranche 1, the Tranche area was divided into the following two parts for which seperate LARPs were prepared.
  - i. LARP1 Arshakunyats avenue section and Artashat highway section
  - ii. LARP3 New Shirak street section
- 16. LARP 1 covers the part of Subproject 2, with the remainder being covered by LARP3.

Figure 3: Tranche1



#### 2.3 LARP Preparation and Implementation

#### 2.3.1 LARP1

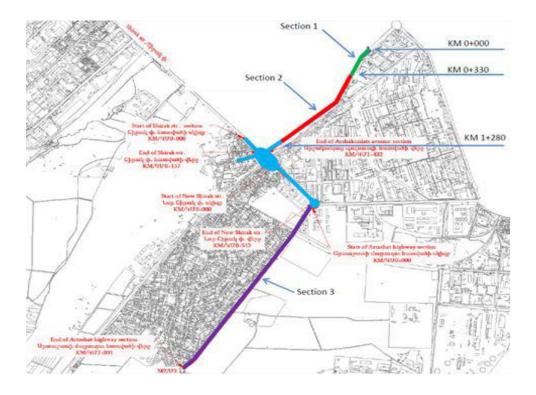
### 2.3.1.1 Preparation

17. LARP1 was approved by ADB on 30 August 2013 and by the Government on 14 November 2013 (Government Decree N 1253). Afterwards, on November 30 the ADB approved the changes to the LARP1 which were done based on the GoA comments on Armenian version of the LARP1.

## 2.3.1.2 Implementation

18. To facilitate the construction team to commence their work according to the agreed schedule, the implementation of LARP 1 was divided into three main sections (Figure 4). Section 1 and section 2 are covered in Tender 1 and section 3 is covered in Tender 2 for the construction package.

Figure 4: LARP1 split into sections



- 19. Construction works in Sections 1 and 2 of LARP 1 completed on 15 December 2014 . On 25 December 2014 Yerevan Mayor officially opened the newly reconstructed Arshakunyats avenue.
- 20. The commencement of construction works for Section 3 was granted in January 2015. During the construction due to some changes in design needed for the relocation of utilities additional impacts emerged at the Artashat Highway Section covered by LARP 1. Trees were cut in the LARP1 area by the contractor without payment of compensation. Based on ADB requierment a Corective action plan on unanticipated impacts under LARP1 and LARP3¹ was prepared and implemented by PIU. In addition, following ADB's suggestion to have in place a step-by-step procedure for engineers to follow in situations when unanticipated impacts emerge, PIU prepared a respective document (see Annex 1) which was revised and approved by ADB.

#### 2.3.2 LARP3

#### 2.3.2.1 Preparation

21. The AH/AP Census and impacts surveys for LARP3 were carried out in March-August 2013 by DESC. LARP3 was approved by ADB on 12 May 2014 and by the Government on 11 September 2014.

<sup>&</sup>lt;sup>1</sup> The CAP also includes new impacts under LARP3 and is presented seperately in clause 2.3.3.3.

#### 2.3.2.2 Implementation

- 22. The implementation started in Q4 2014. By the end of June 2015, 46 contracts and 109 agreements were signed with 81 AP's (110 ID<sup>2</sup>s out of 115 in LARP3). The total amount of the contracts and agreements signed from the begining of LARP implementation was 1.732,7 million drams compared to 2.243,8 million drams envisaged by Yerevan Mayors decree N4809 made on 19 December 2014, which defines the compensation amount of each AH based on valuation reports provided by DESC. Tables 3 and 4 present a record of the LARP3 implementation progress made during the period covered by the report.
- 23. In order to finalize LARP 3 implementation there are still 7 pending issues left;
  - 4 cases out of 7 are in the court. One of the APs applied to the court requesting to aquire the whole property, meanwhile the AP had a disagreement with the compensation amount. In one case the AP refused to sign the contract/agreement because of disagreement with the amount of compensation In the remaining two cases PIU applied to the court as it was not possible to sign the contract due to problems not related to LARP. The court cases in more details are presented in Annex 2.
  - In 2 cases (see Annex 2) the contract/agreement signing delayed due to problems related to reregistration of the legal properties. By the end of June the problems have been solved and the respective contracts/agreements will be signed in July 2015.
  - 1 case is a newly identified legal property. Due to some changes in design 6 newly affected AP's, were identified. Compensation agreements with 5 AP's, who were illegal users, were signed in June 2015. Due to legal procedures a contract with a legal owner of the private land plot will be signed in July 2015.

#### 2.3.2.3 Corrective action plan (CAP)

- 24. Due to some changes in design needed for the relocation of utilities and for providing accesses to the not-directly-affected properties, some additional land acquisition cases emerged at the Artashat Highway Section covered by LARP 1 and the New Shirak Street Section, covered by LARP 3. 6 newly affected AP's were identified. A Corrective action plan (CAP) was prepared by PIU and submitted to ADB on 25 June. ADB approved the CAP on 29 June 2015.
- 25. Compensation agreements with 5 out of 6 newly affected AP's were signed and the compensation amounts were transferred to the bank amounts opened by the PIU for those AP's. A contract with the owner of the private land plot will be signed in July 2015, after the GoA Decree on eminent domain approved on 25.06.2015 comes into force.<sup>3</sup>
- 26. Due to abovementioned design changes in LARP 3 5 AP's (6 ID's) property will not be affected and the AP's were removed from LARP3. Total amounts of the compensations to be paid to the AP's removed from LARP3 and the total amount of the compensation to be paid for unanticipated impacts under LARP1 and LARP3 is presented in the Table2 below.

<sup>&</sup>lt;sup>2</sup> IDs are used for identification of separate units of affected units and one AP may have several ID's. For instance if the part of the land plot is used by AP illegally it will have a different ID then the legal part of the land, or if two different land plots belong to the same AP they have different ID's.

<sup>&</sup>lt;sup>3</sup> A 10 day period is fixed for GoA Decree on eminent decree (681-\u00cc) to come into force after approval by the Government.

Table 2: Total amount of the compensations of the APs removed and added to the LARP

Type of compensation	Total (AMD)	Total (USD)
Total compensation to be paid to APs removed from LARP 3	172,608,538.70	364,922.91
Total compensation to be paid for unanticipated impact under LARP 1 and LARP 3	23,743,779.19	50,198.26

Table 3: LARP3 Implementation Milestone Achievements

To als/A attivities	Pla	ned	Achie	Achieved	
Task/Activity	Start	Finish	Start	Finish	
Submission of draft LARP3 to ADB for	10.11	.2013	30.11.	.2013	
comments					
Submission of finalised LARP3 to ADB for	07.02	.2014	05.02.	.2014	
approval					
ADB approves LARP 3		.2014	12.05.		
RA Government approves LARP3		.2014	11.09.		
RA Government approves LAR budget		.2014	11.09.		
Posting approved LARP document on ADB website	25.05	.2014	Pos	ted	
Posting approved LARP document on YM website	25.05	.2014	11.09.	.2014	
Distribution of the final information pamphlet to APs	15.05.2014	18.05.2014	09.07.	.2014	
Agreement with commercial bank with best conditions for AP's			04.12.	2013	
Bank acounts for AP's opened			11.12.	.2014	
GoA Decree on eminent domain approved			11.09.	.2014	
by the government					
Draft contracts sent to APs	25.05.2014	03.06.2014	08.12.2014	Ongoing	
Signing contracts/agreement	03.06.2014	03.09.2014	19.12.2014	Ongoing	
Distribution of compensation	13.06.2014	13.09.2014	20.12.2014	Ongoing	
Finalization of expropriation, provision of expropriation injunctions	15.07.2014	15.10.2014		Ongoing	
Preparation of LARP Compliance Report	December 2014	07.08.2015	December 2014	Ongoing	
Revision of the LARP Compliance Report					
by ADB	11.08.2015	22.08.2015			
Submission of the revised Compliance report to ADB	25.08.2015	25.08.2015			
Approval of Compliance report by ADB	26.08.2015	27.08.2015			
Hanging over the site to the Contractor	28.08.2015	28.08.2015			
Commencement of civil works	29.08.2015	29.08.2015			

Table 4. LARP 3 implementation output indicators<sup>4</sup>

NO of row	Definition	Unit	Targeted	Achieved	Comment
1	No of AH signed contracts/agreements	N	90	81	
2	No of AH received compensation	N	90	81	Including 5new APs(row11)
3	Componentian amount diskumand	AMD	2,243,766,423	1,732,654,78 6	
4	Compensation amount disbursed	% of total planed <sup>5</sup>		77.2%	
5	No of contracts signed	N of contracts	56	46	
6	Compensation based on contracts	AMD		1,217,506,24 4	
7	No of agreements signed	N of agreements	115	109	Including 5 new APs
8	Compensation based on agreements	AMD		515,148,542	
9	No of cases in court	N		4	
10	No of identified new AHs	N		6	
11	No of identified new AHs received compensation	N		5	
12	No of AHs removed from LARP 3	N		5	

#### 2.3.2.4 Public consultations and documents disclosure

- 27. No public consultations were held in January-June 2015.
- 28. PIU conducted working discussion with 6 new APs on 12th and 15th of June 2015. The aim of the meetings was to inform affected persons about unforeseen impacts which were the result of the design changes. During the working discussions property description protocols, valuation reports were submitted to the AP's and entitlements for compensation were explained. The meeting was attended by the representatives of DESC and EMA.
- 29. In addition to LARP3, the CAP for LARP3 both in English and Armenian versions will be posted on SUDIP's website in July 2015.

<sup>5</sup> Calculations are based on Yerevan Mayors decree N4809 made on 19 December 2014.

<sup>&</sup>lt;sup>4</sup> Numbers presented in the table are cumulative.

#### 2.4 Grievance Redress

- 30. Several parties are involved in grievance redress mechanism: (i) PIU, (ii) YM, and (iii) PGC. To make the process accessible to APs, the GRM was presented during public consultations and was disseminated through the PIU field office and the SUDIP/PIU website.
- 31. The GRM process involves three main steps (Figure 4), whereby the APs firstly have to lodge their complaints to the PIU. Within a period of maximum 30 days the PIU staff must formally inform the APs of the results. If the APs are still not satisfied with the outcome, they can officially lodge their complaint with the Yerevan municipality authorities. The AP must lodge the complaint within one month<sup>6</sup> after receiving response from the PIU. At this higher level the investigation and negotiation process with the APs and related stakeholders must be completed within a period of 15 days. Thereafter they can file a complaint with the Program Governing Council (PGC) if the APs still not satisfied with the outcomes. As a final resort, but at any step of the mechanism, the APs are free to lodge their complaint with the Courts if their grievances have still not been resolved.
- 32. Regardless of the set grievance mechanism and procedures, the APs have the right to submit their cases to the court of law at any point in time during the grievance process.
- 33. In the first half of 2015 PIU received 21 complaints from the AP's. PIU answered to all the 21 complaints received in the reporting period as well as to 13 complaints which were received in December 2014 (see Annex 3) In 30 cases (out of 34 answered by PIU in the reporting period) APs have expressed their disagreement with impact assessment and/or valuation. 13 complaints have been satisfied in favor of AP's, new description protocols and valuations have been prepared by DESC. In all 13 cases there were technical errors<sup>7</sup> done during impact assessment or valuation. It's worth mentioning that in 5 cases in parallel with their disagreement with impact assessment and valuation the AP's were demanding revaluation of the properties due to exchange rate fluctuations. There was also a complaint from a group of Noragavit 20 APs regarding exchange rate flutuations. In 4 cases (one in parallel with disagreement with impact assessment and valuation) the APs were requesting alienation of the whole property. All the complaints regarding revaluation due to exchange rate fluctuations and requests for the alienation of the whole property were rejected by PIU. Compared to the second half of 2014 the number of complaints in the reporting period has been reduced due to the fact that PIU has almost completed implementation of LARP3.

<sup>6</sup> Actually this time limitation for the AP's doesn't work as the YM and the PIU are adressing the AP's complains regardless of the set timeframe.

<sup>&</sup>lt;sup>7</sup> For instance in the DESC's database the land is fixed 115 sqm while in the description protocols 11.5, or in the description protocols it is 115 sqm while in the valuation report it is 11.5. There were also missing trees, not proper measurements of land and structures etc.

AP has a complain PIU AP does AP lodges grievance to PIU field or not accept PIU responses within 30 main office days response AP lodges 2<sup>nd</sup> AP does ΥM not accept YM responses grievance in within 15 30 days to days response AP does not accept PGC PGC YM transfers the respons grievance to PGC response es AP applies to the court  $\mathbf{\Psi}$ Court decision

Figure 5: Grievance Resolution Process Scheme

- 2.5 Compliance of Loan Covenants Related to Resettlement
- 34. Compliance status related to loan covenants concerning resettlement/social issues for the reporting period is provided in Table 5 below:

Table 5: Project Compliance status to Loan Resettlement/Social Covenants

#### Land Acquisition and Involuntary Resettlement

The Borrower shall ensure that all land and all rights-of-way required for each Subproject are made available to the Works contractor in accordance with the schedule agreed under the related Works contract and all land acquisition and resettlement activities are implemented in compliance with (a) all applicable laws and regulations of the Borrower relating to land acquisition and involuntary resettlement; (b) the involuntary resettlement safeguards; (c) the LARF; and (d) all measures and requirements set forth in the respective LARP, and any corrective or preventative actions set forth in a safeguards monitoring report.

#### Being complied with:

The LARF and the addendum were revised and approved by ADB in March 2012 and by the government in November 2012.

LARP 1 was approved by ADB on 30 August 2013 and by RA government on 14 November 2013. LARP 2(Argavand-Shirak road link) was approved by ADB on 9 January 2014. Due to design changes the LARP for Argavand-Shirak road link was updated. The updated LARP was approved by ADB on 09 June 2015.

The LARP 3 was approved by ADB on 12 may 2014 and by RA government on 11 September 2014.

A detailed grievance redress mechanism was established through the LARPs to receive and facilitate the resolution of affected persons' concerns and grievances.

Implementation of LARP1 Arshakunyats section started in the end of December 2013, and was completed in May 2014. The implementation of LARP1 Artashat section started in July and was finalized in October 2014. The implementation of LARP 3 started in Q4 2014 in will be finalized in July 2015.

Without limiting the application of the involuntary resettlement safeguards, the LARF or the LARPs, the Borrower shall ensure that no physical or economic displacement takes place in connection with the Subprojects until:

Compensation and other entitlements have been provided to affected people in accordance with the LARPs; and

A comprehensive income and livelihood restoration program has been established in accordance with LARPs.

Human and Financial Resources to Implement Safeguards Requirements

The Borrower shall make available necessary budgetary and human resources to fully implement the EMP, the LARPs and IPP.

#### Being complied with:

All AHs from Arshakunyats and Artashat sections signed the agreements/contracts and were compensated before physical or economic displacement was made.

#### Being complied with:

For the proper implementation of the resettlement and environmental arrangements a resettlement specialist and an environmental specialist have been involved in the new project unit. DESC also has environment and resettlement specialists in their staff composition. Constructor's staff also

included environmental and social specialists.

LARP implementation team consisting of team leader, two social specialists and two lawyers was hired on 19 November 2014 to assist the PIU during LARP3 implementation.

Budgetary resources are being available in accordance with the financing plan described in periodic financing request.

#### Safeguards Monitoring and Reporting

#### The borrower shall do the following

(a) submit semi-annual Safeguards
 Monitoring Reports to ADB and disclose
 relevant information from such reports to
 affected persons promptly upon
 submission;

- (b) If any unanticipated environmental and/or social risks and impacts arise during construction, implementation or operation of the project that were not considered in the EIA, the EMP, and the LARP, promptly inform ADB of the occurrence of such risks or impacts, with detailed description of the event and proposed corrective action plan;
- (c) No later than [6 months], engage qualified and experienced external experts or qualified NGO under a selection process and terms of reference acceptable to ADB, to verify information produced through the Project monitoring process, and facilitate the carrying out of any verification activities by such external experts; and
- (d) Report any actual or potential breach of compliance with the measures and

#### Being complied with:

- (a) All Semi-annual Social Safeguards Monitoring Reports have been submitted to ADB on semi-annual basis. The Semi-annual Social Safeguards Monitoring report for the first half of 2014 was submitted to ADB in Q3 2014 and after receiving ADB comments the report was delayed by PIU. It was agreed with ADB to submit the report for the whole 2014 in 2015. The Semi-annual Social Monitoring Reports for 2014 (Jan-Jun and Jul-Dec) in one volume was submitted to ADB in Aprill 2015. Starting from 2015 the reports will be again submitted on semi-annual bases.
- (b) A corrective action plan for unanticipated impacts under LARP1 and LARP3 was submitted to ADB on 25 June 2015 and was approved by ADB on 29 June 2015.

(c) An external monitoring agency (EMA) was recruited in the second quarter (Q2) of 2012 under a selection process and terms of reference acceptable to ADB. The EMA monitors and verifies LARP preparation and implementation to determine whether resettlement goals have been achieved, livelihood and living standards have restored and provide recommendation for

requirements set forth in the EMP or the LARP promptly after becoming aware of the breach.

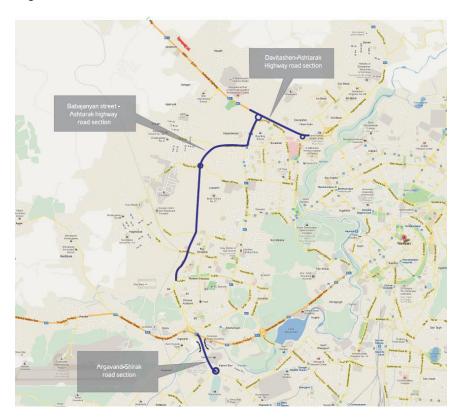
improvement. The EMA scope of work also includes site conditions; compensation, disbursement and grievance redress procedures. ADB approved IMA's compliance reports for LARP1 sections 2 and 3 on 17 June 2014 and 21 November accordingly.

#### 3 Tranche 2

#### 3.1 Background

- 35. Tranche 2 will improve the access to efficient, reliable, and sustainable urban infrastructures and services as a continuation of Tranche 1, and comprises four components:
- (i) the first component will implement the missing links of Yerevan Western Ring Road;
- (ii) the second component will improve the project institutional capacity;
- (iii) the third component will improve the project management facility and will finance consulting services; and
- (iv) the preparation of Tranche 3.
- 36. Tranche/Project 2 subprojects of the first component are focused on three road missing links (Figure 6) to complete the Yerevan Western Ring Road. These three links are divided into five sections(Figure 2, Table 1)
  - Argavand-Shirak road link; (section 5) the construction of a link between Argavand highway and Shirak street West of length approximately 1.3km. The section is covered by LARP 2, originally prepared under Tranche 1 projects.
  - 2. Davitashen Ashtarak highway; (Section 9) of 2.4 km.
  - 3. Babajanyan-Ashtarak highway -6.9 km long divided into three sections:
    - 3.1 Section 6 of 2.2 km, Babajanyan street to Tichina street
    - 3.2 Section 7 of 2.1km, Tichina street to Silikyan old highway
    - 3.3 Section 8 of around 2.6 km, Silikyan old highway to Ashtarak highway;
- 37. Each section will provide dual two or dual three lane carriageways.

Figure 6: Tranche 2



## 3.2 Land Acquisition and Resettlement Plans

- 38. Tranche/Project 2 is categorized by ADB as A for the involuntary resettlement safeguard. To facilitate the implementation of the LARP for Tranche/Project 2, Tranche/Project 2 area is divided into the following 4 parts for which separate LARPs will be prepared.
- (i) LARP for Argavand-Shirak Road Link (Section5)
- (ii) LARP for Davitashen-Ashtarak Road Link (Section 9)
- (iii) LARP for Babajanyan-Old Silikyan (Sections 6, 7)
- (iv) LARP for Old Silikyan Ashtarak Road Link (Section 8)

- 3.3 LARP Preparation and Implementation
- 3.3.1 LARP for Argavand-Shirak Road Link

#### 3.3.1.1 LARP preparation

- 39. LARP for Argavand-Shirak road link addresses the LAR impact of Section 5 (Figure2, Table1), which foresees construction of a link between Argavand highway and Shirak street West of length approximately 1.3km. The alignment passes through the archaeological site known locally as Karmir Blur. This LARP was prepared under Tranche/Project 1 and was approved by ADB on 09 January 2014. The LARP was not sent to the GoA for approval, as Argavand-Shirak section was removed from Tranche/Project1 to Tranche/Project 2 because of shortage of funds. ADB and the PGC gave their no objection on removing this section to Tranche/Project 2 on 14 March 2014 and on 20 June 2014 accordingly.
- 40. Due to minor changes in design, the LARP was updated in April and May 2015. Because of adding right turn in detailed design of Argavand part, 2 new AP's were additionally affected and impact size of 5 AP's were changed. New DMS and census for 2 new AP's were conducted and the impacts of 5 AP's were updated accordingly. 3 AP's from Shirak street were removed from the LARP due to narrowing of the sidewalk.
- 41. In total the LARP for Argavand-Shirak road link identifies 26 families, including owners, renters and users of the lands/buildings, business owners and employees with a total of 105 members. Land plots of 22 families, buildings and structures of 12 AHs, trees/crops of 6, businesses of 5, and employment of 3 persons from 3 AHs will be affected. Out of 26 AH 3 AHs are severely affected losing 10% or more of agricultural income and 2 are vulnerable AHs. Information on different categories of AHs and APs by impact type, as well as net figures without double counting are provided in Table 6.
- 42. On 13 May 2015 PIU submitted the updated LARP for Argavand-Shirak road link to ADB. After receiving ADB comments on 21 May, PIU revised the LARP and resubmitted to ADB on 01 June. LARP for Argavand-Shirak road link was approved by ADB on 09 June 2015. The Armenian version of the LARP was sent to concerned ministies by the end of June.

#### 3.3.1.2 LARP implementation

- 43. Implementation of the LARP for Argavand-Shirak road link will begin after approval of the LARP by the Government.
- 3.3.1.3 Public consultations and documents disclosure
- 44. The first round of public consultations was held in 2010 and 2012 PPTA stage. LARP further consultations were held in May 2013 for affected persons. The consultations included presentations of the entitlements matrix, redress mechanisms, valuation methodology, and measurement survey, project map with actual measurement and AP's names, as well as various specific cases, discussed with APs.
- 45. In the reporting period PIU conducted consultation with 2 new APs from Argavand on 30 March 2015, and informed them about the project, entitlements, grievance redress mechanism and gave other project related information.

- 46. On May 6, 2015 PIU organised a working discussion with the AP's from Shirak street, including the 3 AP's that were removed from the LARP. The aim of the meeting was to present APs the procedure of LARP implementation, especially contract signing process informing them about their legal rights. Once more AP's were informed about the right to present the complaints within 10 days after notification of signed protocol.
- 47. Based on LARP3 experience when many technical mistakes in the description protocols were found out at LARP implementation stage, when the protocols were submitted to the AP's, PIU changed its aproach and submitted the description protocols to the AP's at the stage of LARP preparation. It must be noted that PIU hasn't received any complaints regarding description protocols, though the AP's were informed about the legal requirement to present their complaints within 10 days after notification (see paragraph above). PIU sent the notification of signed description protocols to the AP's from Shirak street on 30 April 2015. The description protocols of the AP's from Argavand were send on 08 June 2016, after getting an authorisation letter from the administrative leader of Ararat marz. Description protocols of 5 AP's from Argavand were not submitted because of descrepancies beetwen the size of the land according to the owners sertificates and the actual sizes.
- 48. The final updated implementation-ready LARP in Armenian will be disclosed on YM and SUDIP official websites after GoA approval. The summary LARP information Pamphlet in Armenian will be disclosed to the APs after LARP approval by GoA.

Table 6: Categories of AHs and APs by impact type

		То	tal		
Impact Category	No of units	No of AHs	No of AHs (without double counting)	No of APs	Remarks
		,	A. Impact on	Land	
A1. Agriculture	3	3	3	12	
A2. Commercial	18	15	15	58	2 AHs have 5 commercial lands
A3. Other land	6	4	4	17	3 land plots are directly used by community. Two AHs have 1 land plot.
A4. Special land (river, channel, other Government land)	2	0	0	0	
		В.	Impact on Bu	ıildings	
B1. Commercial	16	9	0	0	All AHs (40 APs) are included in A2
		C. Imp	act on Trees	and Crops	
C1. Fruit Trees	53	3	0	0	1 AHs is included in A1 (7 APs) and 2 AHs are included in A2 (11 APs)
C2. Wood/ decorative trees	56	2	0	0	All AHs are included in A1 (6 APs)
C3. Crops	25	1	0	0	1 AH is included in A2 (6 APs)
D. Impact on Business					
D1. Loss of business	5	5	1	3	4 AHs (19 APs) are included in A2
D2. Loss of employment	3	3	3	15	
Total	-	-	26	105	

Table 7: LARP for Argavand-Shirak road link. Implementation Milestone Achievements

To al./A aki dike	Pla	ıned	Achi	eved
Task/Activity	Start	Finish	Start	Finish
ADB approves LARP for Argavand- Shirak road link	09.01	1.2014	09.01.2014	
Submission of the Updated LARP to ADB for comments	13.05	5.2015	13.05.2015	
ADB review and comments	01.06	6.2015	21.05.2015	
Subbmission of revised Updated LARP to ADB for approval		5.2015	01.06.2016	
ADB approves Updated LARP		6.2015	09.06.2016	
GoA approves Updated LARP	23.07	7.2015		
Posting approved LARP document on ADB and YM websites	23.07	7.2015		
Distribution of the final information pamphlet		7.2014		
Agreement with commercial bank with best conditions for AP's	N	I/A	04.12	2.2013
Bank acounts for AP's opened	25.07.2015	02.08.2015		
Draft contracts sent to APs	02.08.2015	12.08.2015		
Signing contracts/agreement	03.08.2015	10.11.2015		
Distribution of compensation	13.08.2015	20.11.2015		
Finalization of expropriation, provision of expropriation injunctions	17.11.2015	16.01.2015		
Preparation of LARP Compliance Report	02.08.2015	30.11.2015		
Submission of LARP draft Compliance Report to ADB	_	2.2015		
ADB approves the LARP final Compliance Report	01.01	1.2016		
Relevant informtion from Compliance report is disclosed	05.01.2016			
Hanging over the site to the Contractor		1.2016		
Commencement of civil works	03.01	1.2016		

#### 3.3.2 LARP for Davtashen-Ashtarak Road Link

## 3.3.2.1 LARP preparation<sup>8</sup>

49. In the reporting period PIU obtained information about affected properties from Cadaster Committee based on draft detailed design and initiated GoA Decree on preliminary study of properties located in Davtashen-Ashtarak road link section, which is a precondition for

<sup>&</sup>lt;sup>8</sup> The schedule of LARP preparation is presented in Table 8.

commencement of field work, measurements and surveys. The GoA Decree (589-5) was approved by the Government on 26 May 2015, and came into force on 27 June 2015. Field works in this section began on 27 June 2015.

#### 3.3.2.2 LARP implementation

- 50. Implementation of the LARP for Argavand-Shirak road link will begin after approval of the LARP by ADB and the Government.
- 3.3.2.3 Public consultations and documents disclosure
- 51. A public consultation with the AP's from Davtashen-Ashtarak road link was held on 25.06.2015, prior to commencement of field works based on GoA Decree (589-t) on preliminary study of properties. 21 APs (out of 110) and a representative of "Hayastany Hanrapetutiun" armenian daily participated in the public consultation. AP's were introduced the Project, the phases of the project implementaion, design of the road the GoA Decree on preliminary study and the works to be initiated in their communities and properties. The entitlements matrix and the GRM will be presented duringanother public consultation which will be held after approval of the GoA Decree on eminent domain based on the results of the preliminary study.
- 3.3.3 LARPs for Babajanyan-Old Silikyan and Old Silikyan Ashtarak Road Links
- 3.3.3.1 LARP preparation
- 52. There will be 2 LARPs under subproject Babajanyan-Ashtarak Road Link which is divided into 3 sections:
  - i. Section 6 of 1.9 km, Babajanyan street to Tichina street
  - ii. Section 7 of 2.0km, Tichina street to Silikyan old highway
  - iii. Section 8 of around 2.6 km, Silikyan old highway to Ashtarak highway:
- 53. LARP for Babajanyan-Old Silikyan includes sections 6 and 7 and the LARP for Old Silikyan-Ashtarak includes section 8.
- 54. In the reporting period PIU received from the Cadaster Committee information about affected properties based on draft detailed design. PIU will initiate a GoA Decree on preliminary study of properties in Babajanyan-Ashtarak Road Link in the next reporting period<sup>9</sup>.

-

<sup>&</sup>lt;sup>9</sup> A tentative schedule for LARP preparation is presented in Table 8.

## 4 Conclusion, Lessons Learned and Recommendations for next period<sup>10</sup>

- 55. Problems occured in the reporting period can be grouped into two groups
  - 1. technical mistakes in the description protocols and certificates of ownership and
  - 2. unanticipated impacts.
- 56. <u>Technical mistakes in the description protocols and certificates of ownership</u>. In addition to problems related to technical mistakes in description protocols and valuations, many mistakes and discrepancies in certificates of ownership of legal properties came out during the reporting period, which in turn caused several problems;
  - delays in LARP implementation schedule
  - problems related to the LARP planed budget
  - need to redo the detailed measurement, valuation and calculation of compensations
  - need for re-registration of legal properties
  - AP's were becoming doubtful which resulted on further contract/agreement signing
- 57. While the problems related to certificates of ownership are out of PIU's control mistakes in description protocols were because of inaccurate approach from the side of DESC representatives as well as the AP's themselves. Many AP's noted that they have signed the description protocols without going into the details, as it was not the first time that they were signing description protocols without any further actions.

In this regard the PIU recommends to

- enhance staff capacity of survey team
- hold public consultation related to signing of description protocols
- submit the copy of description protocols to the AP's immediately after preparation
- revise the tools for surveys, namely description protocols.
- 58. <u>Unanticipated impacts.</u> Unanticipated impacts under LARP3 in Artashat highway were caused by design changes needed for providing accesses to the adjacent not-directly-affected properties. This caused the following problems
  - delays in LARP implementation schedule
  - problems related to the LARP planed budget
  - need to redo the detailed measurement, valuation and calculation of compensations

<sup>&</sup>lt;sup>10</sup> Due to the fact that during the reporting period PIU was mainly engaged in finalization of LARP3 implementation, conclusions, lessons learned and recomendations sometimes coincide with those of the previous report.

- need for corective action plan approved by ADB
- need for changes in GoA decree on eminent domain
- trees were cut prior to providing compensation to new AP's
- dissatisfaction of the new AP's

#### 59. In this regard it's recomended to

- scrutinize the availability of accesses for all adjacent properties during the periods of detailed design and LARP preparation,
- hold a public consultation and to show the design indicating accesses to all adjacent propeties
- establish a step-by-step safeguard procedure to be followed by the constructor/engineers in situations when unforseen design changes are necessary.

Table 8: Implementation Schedule for the next Reporting Period

TASK	Planned	Achieved
Tranche1, LARP3		
Sending of draft contracts/agreements to APs	July 2015	Ongoing
Signing contracts/agreements	July 2015	Ongoing
Distribution of compensations	July 2015	Ongoing
Finalization of expropriation, provision of expropriation injunctions	August 2015	Ongoing
Preparation of LARP Compliance Report	August 2015	Ongoing
ADB approves the LARP Compliance Report	August 2015	
Handing over the site to the Contractor	August- September 2015	
Tranche2	Planned	Achieved
LARP(2) Argavand-Shirak road link		
Sending of description protocols to APs	April 2015	Ongoing
Submission of updated LARP to ADB	April 2015	Completed
LARP Approval by ADB	April 2015	Completed
LARP Approval by Government	August 2015	Ongoing
Sending of draft agreements/contracts to APs	October 2015	
Signing of agreements/contracts	October – December 2015	
Disbursement of compensations	October 2015- January 2016	
LARP for Davitashen-Ashtarak road link		
Receiving information about affected properties from Cadaster Committee based on draft detailed design	January 2015	Completed
Preliminary study Government decree	June 2015	Completed
Public Consultation (prior to preliminary study field works)	June 2015	Completed
Detail Measurement and Socio Economic Survey	June-July 2015	Ongoing

Government Decree on eminent domain	September 2015	
Public consultation (valuation methodology, GRM,	September 2015	
signing of description protocols, design)		
Collection of required information from different	September-	
ministies	October 2015	
Submission of maps to APs for notification about	September-	
affected/not affected part	October 2015	
Submission of Description protocols to APs	November 2015	
APs request on acquiring the non-affected part of	September-	
their property	December 2015	
APs complaints on Description protocols	November-	
	December 2015	
LARPs forBabajanyan-Old Silikyan and Old S	Silikyan - Ashtarak F	Road Links
Receiving information about affected properties	May 2015	Completed
from Cadaster Committee based on draft detailed		
design		
Preliminary study Government decree	September-	
	October 2015	
Public Consultation (prior to preliminary study field	September-	
works)	October 2015	
Detail Measurement and Socio Economic Survey	October-	
	November 2015	
Government Decree on eminent domain	December 2015	

# Annex 1: SAFEGUARD PROCEDURE TO BE FOLLOWED BY ENGINEERS IN CASE OF UNANTICIPATED IMPACTS

Steps	Responsibility	Activity	Conditions
Step 1	Contractor	Send an official letter (in written form) to the DESC (Supervision team) and PIU regarding an unanticipated LAR impact, arising during construction which was not considered in the respective LARP. This should include  Name/surname and contact numbers of the user/owner of the property  Location (the chainage) of the affected area on the map and address if any  Photos of impacted area  Type and quantity of impact: land, structures, trees, etc.  Detailed description of the reason that caused the unanticipated impact and justification of its necessity.	Construction on the newly impacted lands can start only after PIU's official concurrence.
Step 2	DESC (Supervision team)	Observe the case based on the Contractor's official letter and send a notification to the PIU. The notification should include  Technical (engineering) justification on the permanent or temporary impact Approval of Contractor's justification for the necessity of the unanticipated impact	3 days
Step 3	PIU	<ul> <li>Involve the PIU resettlement specialist in any matter of unanticipated impacts.</li> <li>Confirm the necessity of the unanticipated impact.</li> <li>Initiate government decree on eminent domain upon confirmation of the necessity.</li> <li>Conduct a public consultation with the new APs to present LARP implementation procedure, entitlement matrix and GRM.</li> <li>Send an official letter (in written form) to the DESC (LARP team) to conduct DMS and Census in the unanticipated impacts area.</li> </ul>	3 days after receiving the notification from the DESC(Supervision team)
Step 4	DESC(LARP team)	To conduct DMS, Census and impact assessment based on the methodology used in the respective LARP and the LARF.	i) 5 days after receiving the the official letter from PIU if GD on eminent domain is not requiered or ii) 5 days after GD on eminent domain

		<ul> <li>To prepare and submit the Description Protocols (4 copies) to PIU</li> <li>To prepare and submit the Valuation Reports to PIU</li> </ul>	comes into force
Step 5	PIU	<ul> <li>Signing of Description         Protocols with APs     </li> <li>Submission of signed         Description Protocols to the APs     </li> </ul>	2 days after receiving the description protocols from the DESC (LARP team)
Step 6	DESC (Supervision team)	To prepare a Corrective Action Plan (CAP) on unanticipated impacts according to the format approved by ADB.	12 days after submission of description protocols to the AP's (including a 10 day period for the AP's to lodge their complaints regarding description protocols)  Preparation of CAP can start when all Description Protocols are signed by APs.
Step 7	DESC (Supervision team)	Submission of CAP to PIU for review	
Step 8	PIU	Submission of CAP to ADB	2 days CAP should be submitted to ADB after PIU's review and approval.
Step 9	ADB	Approval of CAP	5 days
Step 10	PIU	To Post the Armenian and English version of CAP on SUDIP's website	1 day after approval of CAP by ADB
Step 11	PIU	<ul> <li>Submission of draft contracts/agreements to the APs</li> <li>Signing the contracts/agreements with APs</li> <li>Payment of compensations</li> <li>Commencement of construction on the newly affected lands</li> </ul>	5 days after approval of the CAP by ADB
Step 12	PIU	The CAP shall be reflected in respective Semi-annual Social Safeguards Monitoring reports.	
Step 13	ЕМА	The process shall be reviewed by the External Monitoring Agency and included in respective compliance report.	

#### Annex 2:

#### LARP3 COURT CASES

- According to LARP 3 only part of the AP's property must be acquired. The AP has applied to the court demanding to acquire the whole property. In the meantime the AP doesn't agree with the compensation amount. Conditioned with the failure to sign a contract within three months after sending the draft contract to the AP according to the RA legislation, on 18 April 2015 PIU transferred the compensation amount to the court's deposit account, and applied to the court. The court hearing is appointed on July 9th, 2015.
- 2 Due to a dispute between the co-owners regarding the proportions of their shares, it was not possible to sign the contract within three months after PIU submitted the draft contract to the AP's. On 28 April 2015 PIU transferred the compensation amount to the court's deposit account, and applied to the court. The court hearing is appointed on July 9th, 2015.
- 3 The AP doesn't agree with the compensation amount. Conditioned with a failure to conclude a contract within three months after sending the draft contract to the AP according to the RA legislation, on 01 April 2015 PIU transferred the compensation amount to the court's deposit account and applied to the court. The court hearing is appointed on July 9th, 2015.
- 4 Conditioned with a failure to conclude a contract in three months period after sending the draft contract to the AP according to the RA legislation, on 30 June 2015 PIU transferred the compensation amount to the court's deposit account. The Company was noticed accordingly.

#### LARP3 PROBLEMATIC CASES DUE TO REREGISTRATION

- 1 The AP's property had problems regarding discrepancies in actual size and registred size. The problem was solved and the property was registered in Cadastre on 19 June 2015. After final valuation of the property the draft contract will be prepared and sent to the AP. The AP has agreed with the initial compansation amout and the contract will be signed July 2015.
- The property has 5 owners and all the owners, except one, have passed away. The only owner alive was abroad and there were no means of communication with her. During the reporting period PIU managed to connect with the owner living abroad and she is in Armenia now. There was also a judicial dispute between possible heirs of the co-owners. The LARP implementation team has discussed with the AP's possible options to settle the issue. Finally a mutual agreement was riched and the heirs of the dead co-owners, after succesful registration of rights of inheritance with mutually acceptable conditions, will have the opportunity to obtain right to ownership and alienate the property. On 25 June the property was registrered in the Cadastre. After final valuation of the property the draft contract will be prepared and sent to the APs. It is expected that the contract with the co-owners will be signed in July 2015.

Annex 3: TABLE OF COMPLAINTS ADRESSED BY PIU IN JANUARY-JUNE 2015

No	ID	Date received by PIU	Type of complaint	Answered by PIU on	PIU's a	ınswer
1	214, 245	09.12.2014	a. Disagreement with impact assessment and/or valuation b. Demand for new access	14.01.2015 REF: 38/02-પ્-8	a. Not justified b. The issu will be resolved after receiving engineer's expert opinion	a.Rejected
2	230-2	10.12.2014	Disagreement with impact assessment and/or valuation	19.01.2015 REF: 38/02- <i>\(\zeta\)</i> -12	Technical error	Corrected
3	177	10.12.2014	Disagreement with impact assessment and/or valuation	16.01.2015 REF: 38/02-य्-11	Technical error	Corrected
4	177-3	12.12.2014	Disagreement with impact assessment and/or valuation	20.01.2015 REF:38/02-प्-12	Not justified	Rejected
5	177	12.12.2014	Disagreement with impact assessment and/or valuation	16.01.2015 REF: 38/02-પ્-11	Technical error	Corrected
6	233	15.12.2014	Disagreement with impact assessment and/or valuation	19.01.201538/02-U-10	Technical error	Corrected
7	195 251	15.12.2014	a.Disagreement with impact assessment and/or valuation b.Request of revaluation due to exchange rate fluctuation	15.01.2015 REF: 38/02-Ч-3	Technical error	a.Impact assessmen t and valuation corrected b.Revaluati on due to exchange rate fluctuation- rejected

8	272	15.12.2014	Disagreement with impact assessment and/or valuation	19.01.2015 REF: 38/02-U-10	Technical error	Corrected
9	230-2	15.12.2014	a.Disagreement with impact assessment and valuation b.Request of revaluation due to exchange rate fluctuation	19.01.2015 REF: 38/02- <i>2</i> -14	Technical error	a.Impact assessmen t and valuation corrected b.Revaluati on due to exchange rate fluctuation- rejected
10	191	17.12.2014	Disagreement with impact assessment and/or valuation	13.01.2015 REF:38/02-Ư-14	Technical error	Corrected
11	214, 245	17.12.2014	Disagreement with impact assessment and/or valuation	14.01.2015 REF: 38/02-પ્-14	Not justified	Rejected
12	235	26.12.2014	Disagreement with impact assessment and/or valuation	29.12.2014 REF:38/02-2-16 30.01.2015 REF: 38/02-2-16	Not justified	Rejected
13	197266	26.12.2014	a.Disagreement with impact assessment and/or valuation b.Request of revaluation due to exchange rate fluctuation	21.01.2015REF:38/02- 20ել	Technical error	a.Impact assessmen t and valuation corrected b.Revaluati on due to exchange rate fluctuation- rejected
14	231	09.01.2015	Disagreement with impact assessment and/or valuation	02.02.2015 sent to ADB via e-mail	Not justified	Rejected
15	A group of Noragavit 20 APS	12.01.2015	Request of revaluation due to exchange rate fluctuation	21.01.2015 REF:38/02-Կ-1	The request is not within PIU's competence. Government and ADB are studying the issue	

16	200	12.01.2015	a.Disagreement with impact assessment and/or valuation b.Request of revaluation due to exchange rate fluctuation	22.01.2015 REF:38/02-Ն-1	Not justified	Rejected
17	255	13.01.2015	Disagreement with impact assessment and/or valuation	21.01.2015 REF:38/02-U-1	Not justified	Rejected
18	241 254	14.01.2015	a.Request of alienation oh the whole property b.Disagreement with impact assessment and/or valuation	01/38-1974h 02.02.2015 38/02-16 26.01.2015	Not justified	Rejected
19	176	14.01.2015	Disagreement with impact assessment and/or valuation	02.02.2015 sent to ADB via e-mail	Not justified	Rejected
20	189,216	15.01.2015	Disagreement with impact assessment and/or valuation	21.01.2015REF:38/02- ¶-1	Technical error	Corrected
21	231	19.01.2015	Disagreement with impact assessment and/or valuation	26.01.2015 38/02-Գ-1	Not justified	Rejected
22	177	19.01.2015	Disagreement with impact assessment and/or valuation	22.01.2015 REF:38/02-प्-1	Not justified	Rejected
23	195	20.01.2015	a.Disagreement with impact assessment and/or valuation b.Request of revaluation due to exchange rate fluctuation	29.01.2015 REF:38/02-Թ-1	Not justified	Rejected

24	177	20.01.2015	Disagreement with impact assessment and/or valuation	22.01.2015 REF:38/02-પ્-2	Not justified	Rejected
25	230-2	29.01.2015	Disagreement with impact assessment and/or valuation	06.02.2015 REF: 38/02-54ել	Technical error	Corrected
26	231	09.02.2015 PIU- 03.03.2015	Disagreement with impact assessment and/or valuation	12.03.2015 REF: 38/02-100	Not justified	Rejected
27	269	17.02.2015 PIU- 25.02.2015	Request of alienation of the whole property	09.03.2015 REF: 38/02-93	Not justified	Rejected
	219,264	27.02.2015	Disagreement with impact assessment and/or valuation	09.02.2015sent to ADB via e-mail.Via REF:38/02-78ել the desc.prot was submitted to the AP	Technical error	Corrected
28	189, 216	02.02.2015	Disagreement with impact assessment and/or valuation	03.02.2015 REF:38/02-Պ-2	Not justified	Rejected
30	244, 239	11.03.2015	Request of alienation of the whole property	18.03.2015 REF: 38/02-117	Not justified	Rejected
31		13.03.2015	Disagreement with impact assessment	09.04.2015	Not justified	Rejected

32	269	RA president 18.03.15 PIU 01.04.2015	Request of alienation of the whole property	02.04.2015 REF:38/02-U-4	Not justified	Rejected
33	196	08.04.2015	Disagreement with impact assessment and/or valuation	09.04.2015 REF: 38/02-U-1	Not justified	Rejected
34	222	15.04.2015	Disagreement with impact assessment and/or valuation	29.04.2015 REF: 38/02-9-2	Technical error	Corrected