



Ecoline  
International

# ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA) SISIAN-KAJARAN (NORTH-SOUTH CORRIDOR) ROAD PROJECT, ARMENIA

## STAKEHOLDER ENGAGEMENT PLAN



*Source: projections of the proposed road collated from the '3D description of the Sisian-Kajaran Road', Armenian Road Department, 2022 [<https://www.youtube.com/watch?v=fu-dgAwjSsU>]*

**March 2024**

ENVIRONMENTAL AND SOCIAL IMPACT  
ASSESSMENT (ESIA)  
SISIAN-KAJARAN  
(NORTH-SOUTH CORRIDOR)  
ROAD PROJECT,  
ARMENIA

STAKEHOLDER ENGAGEMENT PLAN

Prepared by:



Ecoline  
International

**Ecoline International Ltd.**  
(Sofia, Bulgaria)

Director: Dr. Maia  
Gachechiladze-Bozhesku  
Mobile: +380 951 100 727 /  
+ 359 876 63 0522  
E-mail:  
[mgachechiladze@ecoline-  
int.org](mailto:mgachechiladze@ecoline-int.org)



SE SOLUTIONS  
Advancing Environmental Sustainability

**SE Solutions (Pty) Ltd.**  
(South Africa)

Director: Sean O'Beirne  
Tel: +27 (0)12 643 0190  
Mobile: +27 (0)82 903 9751  
E-mail:  
[sobeirne@tiscali.co.za](mailto:sobeirne@tiscali.co.za)



ATMS Solutions

**ATMS Solutions Ltd.**  
(Yerevan, Armenia)

Director: Artak Ter-Torosyan  
Tel.: +37410 58 36 43  
Mobile: +37499 10 94 95  
E-mail:  
[artak.ter-torosyan@atms.am](mailto:artak.ter-torosyan@atms.am)

Prepared for:

The "Road Department" Fund under the Ministry of Territorial Administration  
and Infrastructure of the Republic of Armenia

© Ecoline International Ltd., 2024

All rights reserved.  
Any use of the full text or any part thereof requires  
acknowledgement of document as a source.

## DETAILS OF DOCUMENT PREPARATION AND ISSUE:

Version	Prepared by	Reviewed by	Authorised for issue	Issue Date	Description
1	Ecoline International Ltd. with ATMS Solutions Ltd.	Ecoline International Ltd. and ATMS Solutions Ltd.	Maia Gachechiladze-Bozhesku (Ecoline International Ltd.)	3 July 2022	Draft version for the EBRD's review
2				2 November 2022	Draft for the EBRD's and the Client's review
3				18 November 2022	Final draft for the EBRD's and the Client's review, translation into Armenian and public disclosure
4				26 April 2023	Updated final draft to include a new Project schedule, recent engagement activities, new stakeholders, and EIB and ADB's requirements
5				16 May 2023	Version updated per the EBRD and EIB comments and prepared for public disclosure
6				25.03.2024	Final report updated after disclosure

## LIST OF ABBREVIATIONS

ADB	Asian Development Bank
BAP	Biodiversity Action Plan
E&S	Environmental and social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EIEEC	Environmental Impact Expert Examination Centre (also referred to as 'State Environmental Review' body)
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESS	Environmental and social standards (of the EIB)
GIP	Good international practice
MTAI	Ministry of Territorial Administration and Infrastructure of the Republic of Armenia
NGO	non-governmental organization
NTS	Non-Technical Summary
NSRC	North-South Road Corridor
RF	Resettlement Framework
PR	Performance Requirement (of the EBRD)
RA	Republic of Armenia
RD	Road Department Fund (the Client)
SDA	Spoil disposal area
SEP	Stakeholder Engagement Plan
SR	Safeguard Requirement (of ADB)

## TABLE OF CONTENTS

1. Introduction.....	6
2. Project Description.....	7
3. Stakeholder Engagement and Information Disclosure Requirements.....	10
3.1. National Requirements of Armenia .....	10
3.2. EBRD Requirements.....	10
3.3. EIB Requirements.....	11
3.4. ADB Requirements .....	12
4. Existing Stakeholder Engagement Practices and Previous Project Engagement .....	13
4.1. Summary of Stakeholder Engagement Completed during the Project Feasibility Study in 2016-2018.....	13
4.2. Summary of the ESIA Inception Stage Stakeholder Engagement (2021) .....	14
4.3. Summary of the Project Presentation for Procurement Purposes.....	15
4.4. Summary of the ESIA Scoping Stage Stakeholder Engagement.....	15
4.5. Summary of the Stakeholder Engagement Completed during the ESIA Socio-Economic Study .....	22
4.6. Summary of the Stakeholder Engagement Ongoing during the Resettlement Plan Preparation .....	22
4.7. Summary of the ESIA Disclosure Stage Stakeholder Engagement (2023) .....	23
5. Stakeholder Identification and Analysis.....	25
5.1. Stakeholder Identification Methodology.....	25
5.2. Key Stakeholder Categories and Groups .....	25
5.3. Stakeholder Analysis .....	26
5.4. Stakeholder Engagement Programme .....	30
6. Grievance Mechanism .....	37
7. Monitoring, Evaluation and Reporting .....	39
Annex 1. Summary of Stakeholder Engagement Events (April 2021 to late May 2023) .....	41
Annex 2. Scoping Leaflet disseminated in the Project area and posted online in April 2022.....	43
Annex 3. Land Acquisition and Restoration Plan Grievance Mechanism Logbook .....	46
Annex 4. Sample Grievance Form.....	47
Annex 5. Template of a Stakeholder Engagement Log.....	48

## LIST OF TABLES AND FIGURES

Table 1. Summary of questions raised and responses provided during the ESIA scoping consultation meetings .....	18
Table 2. ESIA Consultation Meetings held between 21 July and 1 December 2023 .....	24
Table 3. External Stakeholders, their Relation to / Interests in the Project and Engagement Methods .....	26
Table 4. Stakeholder Engagement Programme .....	32

Figure 1. Location of the Sisian-Kajaran Road Project (Syunik Region, Armenia) ..... 6

Figure 2. The Proposed Sisian-Kajaran Road together with the Positions of Tunnels and Bridges.. 9

Figure 3. Photos of some ESIA scoping consultation meetings (first four photos) and Resettlement Plan pre-survey meetings (last two photos)..... 17

Figure 4. Project Grievance Mechanism Flowchart ..... 38

## 1. INTRODUCTION

The Road Department Fund (the RD) under the Ministry of Territorial Administration and Infrastructure of Armenia (the MTAI or the Promoter) is the Implementing agency for the construction of the 60 km Sisian-Kajaran road section (the Project) of Armenia's strategic North-South Road Corridor (NRSC) (**Figure 1**).

The Sisian-Kajaran road will be divided into three construction packages<sup>1</sup>:

- Lot 1: 27.1 km Northern road section (from 0+000 km to 27+130 km);
- Lot 2: 8.64 km Bargushat tunnel (from 27+130 km to 35+770 km); and
- Lot 3: 24.2 km Southern road section (from 35+770 km to 60+022 km).

The European Bank for Reconstruction and Development (EBRD) is considering providing a sovereign loan to the Republic of Armenia (the Borrower or the RA) to finance Lot 3: 24.2 km Southern road section (the EBRD Project). The European Investment Bank (EIB) is expected to co-finance the Southern road section (Lot 3). Lot 1: the Northern road section and Lot 2: Bargushat tunnel are expected to be financed by the EIB, the Asian Development Bank (ADB), and the Government of Armenia.



Source: prepared by Ecoline International Ltd. and ATMS Solutions Ltd.

**Figure 1. Location of the Sisian-Kajaran Road Project (Syunik Region, Armenia)**

The Sisian-Kajaran section is one of several sections of the Armenian part of the NRSC in the southern part of the country. The current road H45 connecting Sisian and Kajaran via Tatev and Kapan is approximately 130 km long (**Figure 1**). Despite the maximum speed of 90 km/hour, the travel time takes about 3-4 hours due to difficult mountain terrain. In the

<sup>1</sup> The indicated lengths are preliminary. The final lengths of the sections will be determined after the detailed design is split into three sections; it is anticipated that while the length of the Bargushat tunnel remains the same, several kilometres will be added to it at the portals, thus reducing the lengths of the Northern and Southern sections.

aftermath of the 2020 war between Armenia and Azerbaijan the previously used connection via the M2 road between Goris and Kajaran is not usable for Armenia citizens. To this end, it is proposed to construct a ~60 km greenfield Sisian-Kajaran section of the NSRC (**Figure 1**). The development of the NSRC is a key infrastructure priority for the Government of Armenia.

The EBRD has categorised the Project as “A” in line with its Environmental and Social Policy (2019) as the Project is a greenfield road, over 10 km long, that may cause significant environmental and/or social impacts. Thus, it is required to conduct a formalised and participatory Environmental and Social Impact Assessment (ESIA) of the proposed Project and associated infrastructure. In line with the ADB Environmental Safeguards Policy (2009), the Project falls under ADB’s project Category A as it is likely to have significant adverse environmental impacts that are irreversible, diverse, or unprecedented, and that may affect an area larger than the sites or facilities subject to physical works. According to the EIB Group Environmental and Social Policy (2022), the Project is likely to have significant environmental, climate and/or social impacts and thus is subject to ESIA. A consortium of environmental and social (E&S) consulting companies (the Consultant)<sup>2</sup> has been commissioned to prepare the ESIA and associated documents, followed by their public disclosure for a minimum period of 120 days. **This Stakeholder Engagement Plan (SEP) has been developed as part of the ESIA package.**

The SEP, together with other Project’s E&S documents, was disclosed for over 120 days according to the international lenders’ requirements (namely, from 21 July to 1 December 2023). Following the public disclosure, the ESIA Disclosure and Consultation Report was prepared to document and summarise the feedback from stakeholders received and engagement activities completed during the ESIA disclosure period. The Project’s E&S documents, including this SEP, were updated to capture the feedback from stakeholders collected during the ESIA disclosure and will be re-disclosed, alongside the ESIA Disclosure and Consultation Report, for the Project life-cycle.

The SEP’s objectives are to:

- present the national legal framework and the EBRD’s, EIB’s and ADB’s requirements in relation to stakeholder engagement process;
- identify all Project stakeholders, including those who might be considered vulnerable and might need more support during the consultation process and throughout the entire project cycle;
- develop a stakeholder engagement programme that will be implemented by the Client to ensure that the E&S information on the Project is timely provided and properly communicated to the Project’s stakeholders, and the feedback communication channels are available to them;
- define the means of engaging with the identified stakeholders in a meaningful and culturally appropriate way; and
- propose a procedure or a mechanism for receiving, registering and addressing grievances and suggestions from stakeholders.

## 2. PROJECT DESCRIPTION

According to the feasibility study conducted in 2015, the alignment for the Sisian-Kajaran section was recommended as the alternative offering the greatest benefits, namely improving connectivity to a very important part of the country, by replacing a poor existing road and

<sup>2</sup> The consortium encompasses Ecoline International Ltd. (Bulgaria), SE Solutions Pty. (South Africa) and ATMS Solutions LLC (Armenia) and is supported by Biotope (France) and Biogeotech (Armenia) for biodiversity component.



drastically reducing travel time. It was also preferred as having less impacts on the biodiversity, cultural, and land resources. A preliminary design was completed and approved in 2016 with the road section designed as a single carriageway with climbing lanes on all uphill sections and tunnels as single carriageways in both directions (**Figure 2**). The length of this alignment is approximately 60 km and has a design speed of 100 kph. The detailed design was completed in 2019<sup>3</sup> and approved in 2020<sup>4</sup>. In 2022, a technical audit of the detailed design was initiated by the EBRD<sup>5</sup>. An Environmental Impact Assessment (EIA) was prepared for the Sisian-Kajaran Road Project as per ADB Safeguards Requirements (SR) and national standards, and received a positive conclusion of the RA State Environmental Review in March 2018 (the validity of this conclusion expired in March 2019, so a national EIA was re-launched in March 2023 and a new positive EIA Conclusion was obtained by the RD on 27 November 2023, see **Section 5.4**)

The key components of the proposed road include:

- Three main interchanges at 0 km, 15 km and 57 km;
- 27 bridges to cross both rivers and valleys and maintain the overall design grade for the road. The bridges range in length from 60 m (Bridge 25) to 560 m (Bridge 23);
- Nine tunnel sections ranging in length from 359 m (tunnel 3) to 8.64 km (Bargushat tunnel). All the tunnels will provide for single lane, two-way traffic;
- Four passages for agricultural vehicles and five cattle crossings (all underpasses);
- 14 service roads that would serve to provide a connection between the existing roadways and the new road section ranging from 200 m to 1,280 m.

---

<sup>3</sup> North-South Road Corridor Investment Program, Tranche 4: Section Sisian-Kajaran, Detailed Design, General Report, April 2019.

<sup>4</sup> RA government decision No. 870-A dated 27.05.2020 On approval of the conclusion of the special comprehensive expert examination of the detailed design document for Tranche 4 - Sisian-Kajaran road section within the North-South Corridor Investment Program. <https://www.arlis.am/DocumentView.aspx?DocID=142958>.

<sup>5</sup> The EU Neighbourhood investment Programme's Technical Assistance grant (managed by the EBRD in coordination with EIB and ADB) was used to conduct a technical due diligence, including a review of the Project's Feasibility Study and Detailed Design which were prepared in 2016-2019 and funded by ADB. This review ran in parallel to the ESIA process. The update of the detailed design, if deemed necessary, is expected to be financed by the RD or one of the co-financing Lenders or the contractor, depending on the nature of changes and chosen contracting modality.



### 3. STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE REQUIREMENTS

The Project-related stakeholder engagement will be carried out in accordance with the applicable requirements of Armenia, the EBRD, EIB, ADB and good international practice (GIP). These requirements are briefly described below.

#### 3.1. National Requirements of Armenia

The RA ratified the Aarhus Convention<sup>6</sup> in 2001. The Convention provides for the right of everyone to receive environmental information that is held by public authorities; to participate in environmental decision-making; and to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general. 15 Aarhus centres operate in Armenia: one in Yerevan and 14 in regions<sup>7</sup>.

The Law of the RA “On Freedom of Information”<sup>8</sup> states that each person has the right to address an inquiry to information holder to get acquainted with and/or get the information sought by him/her as defined by the law<sup>9</sup>.

The Law “On Environmental Impact Assessment and Expert Examination”<sup>10</sup> sets out the processes of notification, documentation, public consultations, and appeal procedures and requirements for projects that are subject to an EIA. According to Article 14 of the Law, the types of activities, which should undergo EIA are divided into A, B and C categories depending on their expected impact on the environment.

According to the Law, public notifications and discussions are carried out jointly by project Initiator and the Environmental Impact Expert Examination Centre (“EIEEC”)<sup>11</sup> and the official in charge for public discussions, that is the head of an affected community (i.e., municipality).

The proposed Project belongs to Category A. For projects of this category, public discussions are conducted four times – twice at the *initial EIA* stage and twice at the *main EIA* stage<sup>12</sup>:

- Initial EIA stage:
  - 1<sup>st</sup> discussion is organised jointly by the project initiator and heads of affected communities to share the project idea,
  - 2<sup>nd</sup> discussion is organised jointly by the EIEEC and the heads of affected communities to present and discuss a draft decision on the initial EIA submitted by the project initiator to the EIEEC,
- Main EIA stage:
  - 3<sup>rd</sup> discussion is organised jointly by the project initiator and heads of affected communities to engage the public in the EIA development process and discuss the key EIA results and conclusions,
  - 4<sup>th</sup> discussion is organized jointly by the EIEEC and the heads of affected communities to present and discuss a draft EIA report submitted by the project initiator to the EIEEC.

#### 3.2. EBRD Requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy, which includes ten Performance Requirements (PRs) for

<sup>6</sup> The United Nations Economic Commission for Europe Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters <https://ec.europa.eu/environment/aarhus/>

<sup>7</sup> <https://aarhus.osce.org/armenia>

<sup>8</sup> No HO-11-N adopted 23.03.2003

<sup>9</sup> [http://www.foi.am/u\\_files/file/legislation/FOIeng.pdf](http://www.foi.am/u_files/file/legislation/FOIeng.pdf)

<sup>10</sup> No. HO-110-N dated 21.06.2014

<sup>11</sup> Under the Ministry of Environment of the RA

<sup>12</sup> Refer to the RoA Government Decree No.1325-N dated 19.11.2014 "On the adoption of procedure for public notification and discussions".

key areas of environmental and social sustainability, including PR10 Information Disclosure and Stakeholder Engagement. This particular Project complies with the 2019 EBRD Environmental and Social Policy<sup>13</sup>.

In addition, the EBRD's Independent Project Accountability Mechanism<sup>14</sup>, as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy<sup>15</sup>; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

According to PR10 stakeholder engagement involves the following elements:

- **identification of stakeholders** including those project-affected parties (individuals or groups) who, because of their particular circumstances, may be disadvantaged or vulnerable, and **analysis** to determine the level of communication that is appropriate for the project.
- **stakeholder engagement planning** with the development of a SEP describing how engagement with identified stakeholders will be carried out throughout the project life cycle,
- **information disclosure** which will ensure that relevant project information including its E&S impacts, risks and opportunities are provided to the stakeholders together with **meaningful consultation** – a two-way process which continues on an ongoing basis;
- **grievance mechanism** established to receive and facilitate resolution of stakeholders' concerns and grievances, in particular, regarding the client's E&S performance;
- **ongoing reporting** on E&S performance to stakeholders.

The EBRD also developed a 'Guidance note to PR 10: Information disclosure and stakeholder engagement' (2023)<sup>16</sup> that provides EBRD clients and stakeholders with practical guidance for interpreting and implementing PR10 and suggests GIP approaches for various elements of stakeholder engagement.

In relation to the COVID-19 pandemic, the EBRD issued a briefing note to PR10<sup>17</sup> recommending the use of "alternative methods of disclosure and stakeholder engagement"; in particular: more informative content on project websites, the use of brochures, newsletter distribution via e-mail and messaging applications (e.g. WhatsApp, Telegram), sharing information and receiving feedback on social networks (e.g. Facebook, Instagram), sharing information through mass media, and posting announcements on local information stands. This SEP takes into account the EBRD's recommendations and proposes alternative engagement methods (**Table 4**).

### 3.3. EIB Requirements

The EIB has adopted a set of E&S Standards (ESS) (2022) that projects should follow. ESS 2 – Stakeholder Engagement recognises the importance of stakeholder engagement, as a means to ensure respect for the rights to:

- i. access to information;
- ii. public participation in decision-making processes; and

<sup>13</sup> <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

<sup>14</sup> <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

<sup>15</sup> <https://www.ebrd.com/what-we-do/strategies-and-policies/access-to-information-policy.html>

<sup>16</sup> <https://www.ebrd.com/information-disclosure-and-stakeholder-engagement.pdf>

<sup>17</sup> EBRD. 2020. Stakeholder engagement (PR10) EBRD briefing note. COVID-19. <https://www.ebrd.com/covid19-consultation.pdf>

- iii. access to justice<sup>18</sup>.

According to ESS 2, projects are required to have a stakeholder engagement process involving, at a minimum:

- i. the identification and analysis of the stakeholders;
- ii. the establishment and/or maintenance of a grievance mechanism; and
- iii. some or all of the following elements to varying degrees as deemed necessary by the EIB;
  - a. engagement planning;
  - b. disclosure of information;
  - c. meaningful consultation; and
  - d. monitoring and reporting.

The EIB Group Transparency Policy (2019)<sup>19</sup> sets out the EIB Group's approach to transparency and stakeholder engagement, laying down provisions for the proactive publication of information and documents and their disclosure upon request.

In addition, the EIB Complaints Mechanism Policy (2018) enables alternative and pre-emptive resolution of disputes between complainants and the EIB Group.<sup>20</sup> The EIB Complaints Mechanism Procedures (2018) aim at clarifying, improving and formalising processes in order to facilitate, streamline and better ensure handling of complaints<sup>21</sup>.

To support its clients, the EIB also issued a dedicated 'Guidance note for EIB Standard on Stakeholder Engagement in EIB Operations' (2020)<sup>22</sup> that provides recommendations on how to meet the EIB's requirements regarding stakeholder engagement and summarises GIP approaches for doing this.

### 3.4. ADB Requirements

ADB's Access to Information Policy (2018) reflects ADB's ongoing commitment to transparency, accountability, and participation by stakeholders<sup>23</sup>. The Access to Information Policy provides for clear, timely, and appropriate disclosure, providing information to project-affected people and other stakeholders, clear appeals process, etc. It also contains principles and exceptions to information sharing with external stakeholders.

ADB's Safeguard Policy Statement (2009)<sup>24</sup> highlights the importance of putting meaningful consultation processes into practice and disclosing relevant environmental information to affected people and other stakeholders. It requires the borrower/client to carry out meaningful consultation with affected people and other concerned stakeholders, including civil society, and facilitate their informed participation.

As per the ADB Safeguard Policy Statement, and in line with the EBRD and EIB standards, meaningful consultation is a process that:

1. begins early in the project preparation stage and is carried out on an ongoing basis throughout the project cycle;
2. provides timely disclosure of relevant and adequate information that is understandable and readily accessible to affected people;
3. is undertaken in an atmosphere free of intimidation or coercion;
4. is gender inclusive and responsive, and tailored to the needs of disadvantaged and vulnerable groups;

<sup>18</sup> [https://www.eib.org/attachments/publications/eib\\_environmental\\_and\\_social\\_standards\\_en.pdf](https://www.eib.org/attachments/publications/eib_environmental_and_social_standards_en.pdf)

<sup>19</sup> [https://www.eib.org/attachments/strategies/eib\\_group\\_transparency\\_policy\\_2021\\_en.pdf](https://www.eib.org/attachments/strategies/eib_group_transparency_policy_2021_en.pdf)

<sup>20</sup> [https://www.eib.org/attachments/strategies/complaints\\_mechanism\\_policy\\_en.pdf](https://www.eib.org/attachments/strategies/complaints_mechanism_policy_en.pdf)

<sup>21</sup> [https://www.eib.org/attachments/strategies/complaints\\_mechanism\\_procedures\\_en.pdf](https://www.eib.org/attachments/strategies/complaints_mechanism_procedures_en.pdf)

<sup>22</sup> [https://www.eib.org/attachments/guidance\\_note\\_on\\_stakeholder\\_engagement\\_in\\_eib\\_operations\\_en.pdf](https://www.eib.org/attachments/guidance_note_on_stakeholder_engagement_in_eib_operations_en.pdf)

<sup>23</sup> <https://www.adb.org/documents/access-information-policy>

<sup>24</sup> <https://www.adb.org/sites/default/files/institutional-document/32056/safeguard-policy-statement-june2009.pdf>

5. and enables the incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

The Safeguard Policy Statement also requires the borrower/client to establish a mechanism to receive and facilitate resolution of affected peoples' concerns and grievances about the project's environmental performance, as well as to appropriately inform the affected people about the mechanism.

#### 4. EXISTING STAKEHOLDER ENGAGEMENT PRACTICES AND PREVIOUS PROJECT ENGAGEMENT

This section presents stakeholder engagement activities that took place from the early Project development stage in 2016-2018, before the current ESIA process, and since the launch of the ESIA in April 2021 until late May 2023.

During the preparation of the ESIA and resettlement documents, from April 2021 to late May 2023, over 200 engagement events were held (see [Annex 1](#)). Most were organised with support of the RD and regional, municipal, and local authorities. The engagement follows the requirements of the EBRD, EIB, and ADB and GIP principles for meaningful stakeholder engagement.

##### 4.1. Summary of Stakeholder Engagement Completed during the Project Feasibility Study in 2016-2018

The first stakeholder engagement meetings were arranged during the project feasibility study in March-April and November 2016. The following stakeholders participated in these meetings: the MTAI, Transport Project Implementation Organization, Ministry of Environment (MoE), Ministry of Economy, Ministry of Education, Science, Culture and Sport, Environmental Protection and Mining Inspection Body, Ministry of Health, State Committee of the Real Estate Cadastre (presently called 'Cadastre Committee'), and non-governmental organizations (NGOs).

The next round of public consultations served to present the project alignment and EIA. It comprised meetings in Kapan Community on 10 November 2017 (with 117 participants, of whom four were women), and in Sisian and Kajaran Communities on 17-18 January 2018, respectively, with 26 participants in total (of whom six were women).

Information regarding consultations and a call for participation was circulated through *Hayastani Hanrapetutyun* newspaper and on the Transport Project Implementation Organization website. In addition, invitations were sent directly to key stakeholders through the Yerevan Aarhus Centre Network. The general public and local communities, as well as the government agencies and NGOs participated in the consultations.

Several core issues emerged, one of which was the alienation of community lands of agricultural significance that had no ownership certificates/titles. Participants were informed of the land cadastre measurement and registration process, as well as the procedure for changing land use from agricultural to transport after the land would be registered to the state. As the consultation occurred at an early stage in project design, it was agreed that questions related to new dumping sites, size of Kapan Forestry zone to be affected, potential negative consequences on water supply and legal prohibition of allocating community lands along roads would be addressed after the final approval of the design. In response to concerns about archaeological protection zones, the project's environmental management and archaeology specialist assured that appropriate measures to preserve the monuments would be implemented.

#### 4.2. Summary of the ESIA Inception Stage Stakeholder Engagement (2021)

The consultation process for this ESIA was initiated with inception / pre-scoping meetings with support of the RD:

- On 8-10 April 2021, consultation meetings were held with the representatives of the Syunik Regional Administration, Kajaran Community Administration, and Geghi Administrative Area, and Zangezour State Sanctuary (attended by the RD representatives as well).
- On 20 April 2021, consultation meetings were held with the representatives of the Sisian Community Administration and Darbas Administrative Area.

The administrations of Syunik Region, and Kajaran and Sisian Communities have appointed Contact Points for the Project to support the Project and facilitate further ESIA engagement activities with the authorities and local population, as well as local NGOs.

During the meeting with the Syunik Regional Administration, the overall aim of the Project was presented. The representatives of the Syunik Regional Administration highlighted the potential positive impacts of the road construction on the development of infrastructure, tourism sector and road-related services (hotels or catering), time saving of the road uses, as well as reduction in transports costs, and greater accessibility of markets for local cattle breeders that would be able to sell their products. The road construction was mentioned to be likely to lead to economic diversification (i.e., reduction of mining dominance in the region's domestic product's structure).

A generally overall positive attitude towards the Project as part of the Sisian-Kajaran Road was also expressed during the consultations with the Kajaran Community Administration highlighting the benefits for residents in terms of temporary labour opportunities (at present, the majority of the population in Kajaran are employed in the Kajaran Copper-Molybdenum Mine). The municipal authorities requested that spoil disposal during the construction must be discussed with them.

Meetings in the Sisian Community Administration revealed anticipation of a large-scale assets acquisition given a few small farms and larger businesses in the area. Hence, private sector stakeholders will require special attention during the Project engagement depending on the connecting roads alignments.

After the Sisian-Kajaran road alignment (and respectively the Consultant's scope of work) was confirmed by the RD and EBRD, the Consultant continued inception consultations.

On 8 December 2021, a meeting with Syunik Region Deputy Governor was held to present and discuss the Consultant's scope of work, the road alignment as well as the potential E&S impacts/opportunities. The Deputy Governor has committed to supporting the Consultant in E&S studies and to being a high-level focal point for the Project.

On 9 December 2021, meetings were held in Kajaran and Sisian Community Administrations, and the following topics were discussed:

- the current status of Project implementation and next steps,
- the current design of the Sisian-Kajaran road section,
- the key potential E&S risks/opportunities, and
- land acquisition issues.

Both community administrations were familiar with the presented alignment from earlier consultations held in 2016-2018.

To identify the scale and types of land acquisition impacts the Consultant conducted seven meetings-workshops with the heads of rural settlements and villagers in Kajaran and Sisian Communities to be affected by the road construction on 27-28 December 2021. The key findings are summarized below:

- The cadastral maps have some inconsistencies with de facto boundaries of the lands which should be considered during the Resettlement Plan preparation;
- A number of private land plots, ancillary structures, such as barns and cattle sheds, and several private residential houses may be affected (both used and ruined / abandoned);
- In some villages, the potentially affected land plots are non-irrigated arable lands;
- Some Project affected households will need support in legalising their rights to land;
- The proposed route is located at the distance of around 90ms from the Shamb Hydropower Plant and crosses the water tunnel of the Hydropower Plant;
- The cattle passages shall be considered in the road design and agreed with the village Vorotnavank, Lor, Shenatagh and Darbas administrations [in some villages, the passes shall be large enough to allow passage of agricultural machinery];
- The cultural heritage sites of Davit Bek Fortress and the Vorotnavank Monastery are not affected by the planned road;
- An old burial site/tomb in Vorotnavank located 50m from the proposed route and a historical monument “cross stone” (Khachkar) in Darbas located closer to the proposed road should be protected during the construction works;
- The Iran-Armenia Gas pipeline is crossed by the route in three points in Darbas and at one point in Geghi, and an irrigation water pipe is crossed in one point in Darbas;
- There is an issue with soil erosion in Darbas at the project affected area which shall be considered during the detailed design;
- In Aghitu, a crushed stone mine is located under the planned bridge and a natural monument (a cave) is located at the distance of 125m from the planned route;
- In Geghavank and Kavchut, structures are located downslope the proposed route and measures should be taken to avoid stone falls.

Overall, 35 key informants and/or consultees were engaged at the regional, municipal, and local levels during the ESIA inception stage.

#### 4.3. Summary of the Project Presentation for Procurement Purposes

On 3 August 2021, the MTAI and RD held a meeting to present the approaches to the technical and tender processes for the Sisian-Kajaran Road construction<sup>25</sup>. The construction companies that attended the event posed questions about the reasons behind designing steel bridges (that have to be imported) instead of standard concrete structures that are produced and used in Armenia; whether the land acquisition would be completed before the construction contractors can start their work and who would be responsible for relocation of public utilities crossed by the proposed road. The RD explained the reasons for certain technical and design decisions; clarified that the land would be acquired before the construction contractor enters the project site(s), and that it would be the responsibility of the contractor to relocate the affected public utility facilities as would be identified in the design.

#### 4.4. Summary of the ESIA Scoping Stage Stakeholder Engagement

The 30-day scoping discussions were announced by the RD on 14 April 2022<sup>26</sup> simultaneously with disclosing the **Scoping Report** and **Scoping Leaflet** in Armenian and English<sup>27</sup> and inviting the stakeholders to the first meeting in Yerevan (see **Table 1**). The

<sup>25</sup> The RD's Youtube channel: <https://www.youtube.com/watch?v=f5lk1j197Vk>

<sup>26</sup> Refer to the RD official website (English and Armenian): [https://armroad.am/en/news/inner/News\\_14.04.2022](https://armroad.am/en/news/inner/News_14.04.2022) and [https://armroad.am/am/news/inner/News\\_14.04.2022](https://armroad.am/am/news/inner/News_14.04.2022). Also announced on the Consultant's webpage for the Project: <https://ecoline-int.org/projects/armenia/sisian-kajaran/>

<sup>27</sup> <https://armroad.am/en/safeguard/environmental-impact/el-reports>



Scoping Leaflet is attached as **Annex 2**. The state bodies and Yerevan-based E&S NGOs were invited to the first scoping meeting via formal correspondence and phone calls.

On 18-19 April 2022, the Consultant's team travelled to the Project region and communities and delivered the hard copies of the Scoping Report and Scoping Leaflets. These were placed at the regional, community and local administrative buildings to be accessible to any interested stakeholder. During this trip, the Consultant also presented the planned agenda and aims of the scoping consultation meetings and discussed the schedule, venues and timing of the planned five local scoping events with the community and village authorities. The local authorities were specifically asked to encourage the participation of women in the meetings.

On 22 April 2022, five announcements about five planned scoping consultation meetings were published in "Hayastani Hanrapetutyun" newspaper, No. 73 (7739), 22.04.22. The RD posted the announcements about five planned scoping consultation meetings on the RD's website and Facebook page<sup>28</sup>. The Consultants also posted this information on own websites<sup>29</sup>. The hard copies of the announcements were posted on the notice boards of the community administration buildings.

Overall, as part of the ESIA scoping and disclosure stage seven scoping consultation meetings were conducted in April – May 2022 (**Table 1**), six covering all E&S aspects and one focusing on biodiversity issues specifically (**Figure 3**). A scoping presentation was prepared and delivered during the scoping meetings, supported by a short **Project 3D simulation video** in Armenian. The agendas of the meetings included the following:

1. Project introduction and overview,
2. Environmental and social impact assessment (ESIA) and Scoping,
3. Objectives of the scoping meeting,
4. Environmental and social findings of the scoping: baseline and potential issues and benefits,
5. Stakeholder engagement (a preliminary SEP was disclosed as part of the Scoping Report) and grievance mechanism, including contact details of the RD and the Consultant, and
6. Questions and Answers session.



Darbas village



Sisian town

<sup>28</sup> [https://armroad.am/am/news/inner/News\\_25.04.2022](https://armroad.am/am/news/inner/News_25.04.2022) and <https://www.facebook.com/armroad.am/posts/4969409639843357>

<sup>29</sup> Ecoline International Ltd.: <https://ecoline-int.org/projects/armenia/sisian-kajaran/> and ATMS Solutions Ltd. <https://atms.am/scoping-stage-disclosure/>



**Figure 3. Photos of some ESIA scoping consultation meetings (first four photos) and Resettlement Plan pre-survey meetings (last two photos)<sup>30</sup>**

Information about the completed events and photos from the meetings were posted on the Consultant’s website and LinkedIn page<sup>31</sup>.

The representatives of the RD and/or the Consultants addressed the technical (design) and E&S questions raised (**Table 1**). Detailed explanations of the land acquisition and compensation mechanisms were provided and questions for further consideration in the ESIA were noted, such as re-visiting of the locations of spoil disposal areas, re-confirming the locations of the cattle and agricultural underpasses, arrangement of green bridges, a potential for radioactivity in the Lernadzor area, and enforcement of monitoring and mitigation measures that will be developed in the ESIA.

The Project Grievance Mechanism was presented together with the contact details of the RD and the Consultant for any questions, comments or complaints.

<sup>30</sup> Photos taken by the Consultant.

<sup>31</sup> ATMS Solutions Ltd.: <https://www.linkedin.com/feed/update/urn:li:activity:6930887757535789056/>.

**Table 1. Summary of questions raised and responses provided during the ESIA scoping consultation meetings**

No.	Date	Location	Number of participants <sup>32</sup> (women)	Key questions /issues raised by the participants	Responses by the RD and/or the Consultant
1	21.04.2022	Yerevan <sup>33</sup>	10 (3)	<ul style="list-style-type: none"> <li>Stability of the planned road components, such as bridges and tunnels;</li> <li>Water quality impact assessment within the ESIA;</li> <li>Preparation of a national EIA (timeline, etc.).</li> </ul>	<ul style="list-style-type: none"> <li>In 2018, the Project passed State Complex Expert Review and received a positive conclusion of the interagency commission established by the RA government. This Review included the seismic safety/stability issues. Soil erosion and other geological properties shall be also considered within the ESIA;</li> <li>The Consultant prepared air, soil and water quality as well as noise and vibration sampling and measurement plan and the field works would start in May 2022;</li> <li>The ESIA report to be elaborated will be used for the national EIA and State Environmental Expert Review processes. However, as the validity of the State Environmental Expert Review’s conclusion issued by the Ministry of Environment is only one year, it is planned to initiate the national EIA process at a later stage.</li> </ul>
2	02.05.2022	Sisian	18 (3)	<ul style="list-style-type: none"> <li>Tunnel emergency escape routes;</li> <li>Changes to the Project design document;</li> <li>Cattle passages envisioned by the Project design document;</li> <li>Location of spoil disposal areas;</li> <li>Generation of groundwater during the tunnel excavation;</li> </ul>	<ul style="list-style-type: none"> <li>Only Bargushat tunnel will have an emergency escape route;</li> <li>The Project design document has passed all expertises, including State Complex Expertise by the RA Governmental interagency committee and State Environmental Impact Expert Review. Minor changes into the design document can be required during the construction;</li> <li>During the Project design stage several years ago, locations of passages for cattle and agricultural machinery were presented. During the field social study the ESIA team will discuss their locations with the heads of settlements and farmers to obtain their opinions once again;</li> <li>Presently, there are eight proposed spoil disposal sites, five in Sisian-Shenatagh section and three in Qirs-Kajaran section. The Construction Contractor, once selected, should prepare Site-specific Environmental Management Plans (SEMPs) for each site that will consider all impacts and mitigation measures. The spoil can be disposed only when the SEMP’s are approved by the head of community and RD. Total amount of spoil materials will approx. 12 mln.m3.;</li> <li>Geological and hydrogeological surveys were done. However, additional clarification and solutions will be provided during the construction;</li> <li>As per the initial estimate 527 land-plots / properties were subject to land</li> </ul>

<sup>32</sup> Including the ESIA experts. The lists of participants and protocols of the meetings are available upon request.

<sup>33</sup> [https://armroad.am/en/news/inner/News\\_21.04.2022\\_3](https://armroad.am/en/news/inner/News_21.04.2022_3)

No.	Date	Location	Number of participants <sup>32</sup> (women)	Key questions /issues raised by the participants	Responses by the RD and/or the Consultant
				<ul style="list-style-type: none"> <li>Land compensation provisions;</li> <li>Effect on some rural roads close to the planned road alignment.</li> </ul>	<p>acquisition. According to the State Cadastre’s latest information, ca. 580 land-plots will be allocated for the Project. When the Land acquisition and Resettlement Framework is approved by the RA Government, the detailed field surveys, including measurements and evaluations of affected land-plots/properties, will be performed by an independent evaluator. The actual land users will be identified and their potential losses will be compensated. The land-plots that are informally (illegally) used by the residents as well as crops that will be potentially lost as a result of land-plots allocation for the Project will also be compensated. The illegal land users will be compensated for the crop, while the actual land owners will be compensated for the loss of land;</p> <ul style="list-style-type: none"> <li>Temporary access roads will be organized before the start of construction works. If during the construction works any property damages within the temporary affected areas take place, the compensation for damages will be provided by the Construction Contractor.</li> </ul>
3	02.05.2022	Darbas	24 (4)	<ul style="list-style-type: none"> <li>Lack of land ownership certificates as well as cases of possible inherited properties;</li> <li>Locations of cattle passages;</li> <li>Land alienation and compensations;</li> <li>Capacities to accommodate construction workers.</li> </ul>	<ul style="list-style-type: none"> <li>A special team of lawyers will be established to support the residents to solve and regulate these issues;</li> <li>It is necessary to verify the location of cattle passages.. It is planned to discuss these as part of a series of individual and group interviews in Project affected settlements, including Darbas and Getatagh villages during the field social study. There will be group discussions as well to check with respondents all vital issues, including passages;</li> <li>The list of alienated land-plots will be provided by the Republic of Armenia State Cadaster Committee. Affected properties will be measured and compensated and grievance mechanism will be implemented;</li> <li>Some individual houses can be rented and also new accommodation facilities can be created, if needed.</li> </ul>
4	02.05.2022	Shenatagh	11 (2)	<ul style="list-style-type: none"> <li>Reasons for construction of the road;</li> <li>Land alienation mechanism;</li> </ul>	<ul style="list-style-type: none"> <li>Sisian-Kajaran road section is part of the North-South Road Corridor Investment Project that would connect Armenia with neighbouring countries. The road construction will be very important for the development of Armenia’s economy.</li> <li>The land acquisition will be performed in accordance with the national and EBRD requirements. The land-plots evaluation principles are being defining. The land-plots inventory will be conducted and the compensation costs will be calculated. The compensation scheme of the property will be market price plus 15%;</li> </ul>

No.	Date	Location	Number of participants <sup>32</sup> (women)	Key questions /issues raised by the participants	Responses by the RD and/or the Consultant
				<ul style="list-style-type: none"> <li>• Location of passages for people, cattle and agricultural vehicles;</li> <li>• Location of spoil disposal areas.</li> </ul>	<ul style="list-style-type: none"> <li>• It is planned to conduct a series of interviews in Project affected settlements within the framework of the field social survey. There will be groups of interviewers who will check with the respondents all vital issues, including the cattle passage locations;</li> <li>• In 2015-2016 the head of Shenatagh community allocated an area for disposal of spoil materials within the administrative boundaries of the village.</li> </ul>
5	03.05.2022	Kajaran	25 (9)	<ul style="list-style-type: none"> <li>• Drainage systems of tunnels;</li> <li>• Potential presence of natural resources like uranium in the Lernadzor area (and thus any source of radiation);</li> <li>• Land alienation mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• All tunnels will have waterproof protection, but only the Bargushat tunnel will have a drainage system, because only that tunnel will have the length of more than 1.0 km. The drainage will not be carried out using a two-tier drainage system. The water collected from the drainage system will be accumulated and used for firefighting and for other purposes;</li> <li>• The Project was designed in 2016. Geological studies were carried out in the area of the planned activity and no cases of increased radiation were identified;</li> <li>• The land-plots inventory will be conducted and the compensation costs will be calculated. The compensation scheme of the property in case of overriding public interest will be market price plus 15%. In addition, crops, trees and other structures will also be compensated. The residents will be allowed to dismantle the existing structures and also to collect the crops.</li> </ul>
6	03.05.2022	Geghi	19 (6)	<ul style="list-style-type: none"> <li>• Possibility to arrange parking area near Bargushat tunnel;</li> <li>• Possibility to make the proposed road wider;</li> <li>• Location for disposing the excavated spoil material and relocation of one of them;</li> <li>• Land alienation mechanism;</li> <li>• Risks of properties' damages due to blasting.</li> </ul>	<ul style="list-style-type: none"> <li>• There could be parking areas near the entrances to the Bargushat tunnel.</li> <li>• Many historical and cultural monuments, hydroelectric power stations and other buildings next to the planned road make it impossible to widen it;</li> <li>• Three areas proposed for spoil disposal along the planned road Qirs-Kajaran section were shown on the map. Alternative locations can be considered.</li> <li>• Land alienation mechanism was explained; land, crops, trees and other structures will be compensated as per the national and EBRD requirements.</li> <li>• Prior to blasting, dated stickers will be attached on the existing cracks. If the stickers are torn and cracks in the walls increased during the construction, there will be appropriate compensation.</li> </ul>
7	10.05.	Yerevan	4 (2)	<ul style="list-style-type: none"> <li>• Spoil disposal areas to be generated</li> </ul>	<ul style="list-style-type: none"> <li>• The ESIA consultant will come up with alternative locations of the spoil</li> </ul>

No.	Date	Location	Number of participants <sup>32</sup> (women)	Key questions /issues raised by the participants	Responses by the RD and/or the Consultant
	2022			during the excavation and tunnel construction works; <ul style="list-style-type: none"> <li>• Green bridges for wild animals;</li> <li>• Monitoring of impacts on biodiversity during construction and operations.</li> </ul>	disposal areas; several options were discussed in situ and it was suggested to develop proposals together; <ul style="list-style-type: none"> <li>• Potential locations of the green bridges are being worked on together with the meeting participants and other partners; it was suggested to develop proposals in cooperation with the biodiversity community;</li> <li>• The ESIA team agrees that monitoring is very important and it will be part of the ESIA and BAP actions. Monitoring may include independent experts and public actors / NGOs.</li> </ul>

All participants were invited to provide their suggestions on the scoping materials until 12 May 2022 and any other comments or inquiries any time before or during the public ESIA disclosure (see [Annex 2](#)). The contact details of the RD and the Consultant were disclosed at the meetings and via the scoping leaflets ([Annex 2](#)), scoping presentation, newspaper and website announcements, and scoping report. During the scoping discussion period, neither the RD, nor the Consultant received any written or phone communication from stakeholders.

The issues raised during the scoping consultations were followed up via individual meeting as well as during the socio-economic studies and subsequent engagements. Where relevant, they translated into the information in the ESIA baseline or E&S recommendations for the Project implementation.

#### 4.5. Summary of the Stakeholder Engagement Completed during the ESIA Socio-Economic Study

As part of the socio-economic study for the ESIA, further consultations on various environmental and socio-economic topics continued in all affected villages. The socio-economic field studies were largely completed in May – June 2022 comprising in-depth interviews with key informants, focus group discussions and individual or group consultations with 180 persons in total, including 81 women (details are provided in ESIA Volume 4. Social Environment).

The engagement covered the residents / key informants in the Project-affected villages, with specific effort to obtain information from and consult directors / teachers of school and/or kindergartens, local doctors or nurses, farmers, cattle-breeders, bee-keepers and vodka-makers, land and assets users or owners, cultural heritage custodians, permanent and seasonal residents, housewives, local small/micro businesses, vulnerable persons, residents of the houses closest to the existing roads that might be used by construction traffic; local, community and regional administrations, local and regional NGOs (including Women's Resource Centre), small business sector locally, public infrastructure operators and other stakeholders. Special attention is paid to consultations with the residents and other stakeholders on: i) the use of the local culturally, historically and socially valued facilities, sites or objects and ways to avoid impacts to them; ii) impacts on biodiversity and use of ecosystem services and dependence on them; iii) livelihoods (including cattle and agricultural passes) and gender aspects. The results are documented in the ESIA documents.

#### 4.6. Summary of the Stakeholder Engagement Ongoing during the Resettlement Plan Preparation

In August 2022, the Resettlement Plan preparation for the Project was launched. As part of it, in August-September of 2022, the ESIA Consultant and RD experts conducted 14 public consultations with land-owners/users of land plots that will be affected by the Project land acquisition (Project-affected people or PAPs) and local authorities.

The meetings took place in all affected villages and gathered 140 participants in total<sup>34</sup>. The PAPs were informed about the meetings through the heads of administrative units seven days before the meetings. The local authorities were specifically asked to encourage the participation of women in the meetings. In parallel, announcements about the upcoming meetings were sent to the local self-government bodies by email, and posted on the announcement boards of the affected villages. Prior to the consultation meetings, a **Land Acquisition and Livelihood Restoration Leaflet** was prepared. The leaflet was disseminated among the participants of the meetings, and additional copies were left with the heads of administrative units for further distribution to the PAPs who did not attend the meetings.

The consultation meetings followed the below agenda:

- Presentation of Project design, goals, stakeholders, and implementation procedure;

<sup>34</sup> The minutes of the meetings will be publicly disclosed as part of the Resettlement Plan.

- Description of main phases of land acquisition and resettlement, in particular, design, measurement survey (inventory of affected assets), census and social-economic survey, recognition of eminent domain, preparation of the Resettlement Plan and its implementation;
- Explanation of compensation and livelihood restoration eligibility and entitlements as per loss type, and the cut-off date;
- Presentation of grievance mechanism, in particular the roles and duties of parties responsible for grievance reviews, ways and methods of redress, a timeline for the complaint examination and provision of response; and
- Questions and Answers session and registration of grievances, if any.

The results of the meetings are documented and will be attached to the Resettlement Plan.

Further public meetings and individual consultations will be held to discuss the draft Resettlement Plan. Proactive measures to: i) engage with vulnerable households identified during the census and ii) increase women participation in consultations are embedded in the Resettlement Plan's engagement planning process.

#### 4.7. Summary of the ESIA Disclosure Stage Stakeholder Engagement (2023)

The ESIA disclosure package included six documents, each in the Armenian and English languages:

- ESIA report, including an Environmental and Social Management Plan (ESMP);
- Non-technical Summary (NTS);
- Stakeholder Engagement Plan (SEP);
- Environmental and Social Action Plan (ESAP);
- Biodiversity Action Plan (BAP); and
- Resettlement Framework (RF).

The announcement about the 130-day disclosure period was published (in English and Armenian) on the website of the RD on 21 July 2023:

- Armenian: [https://armroad.am/am/news/inner/News\\_21.07.2023](https://armroad.am/am/news/inner/News_21.07.2023),
- English: [https://armroad.am/en/news/inner/News\\_21.07.2023](https://armroad.am/en/news/inner/News_21.07.2023).

The RD also posted the announcement at their 'News' page at Facebook.

In parallel, the EBRD announced the disclosure on its website at <https://www.ebrd.com/work-with-us/projects/esia/northsouth-corridor-sisiankajaran-road-project.html>.

The printed versions of the ESIA package documents were made available for the public at:

- Road Department Fund at Government Building 3, 1st floor, Republic Square, Yerevan 0010, Armenia;
- Sisian Community Administration, Sisakan St. 31, 3501 Sisian, Armenia;
- Kajaran Community Administration, Lernagortsneri St. 4, 3309 Kajaran, Armenia; and
- EBRD country office at Piazza Grande Business Centre, 2nd floor, rooms 95-97, 10 Vazgen Sargsyan Street, 0010 Yerevan, Armenia.

In addition, the NTS was printed out by the ESIA Consultant and delivered to the Project-affected villages to ensure easy access for local residents. Thus, the NTS was available at the administration buildings of: Ishkhanasar, Aghitu, Noravan, Vaghatin, Vorotnavan, Darbas, Getatagh, Lor, Shenatagh, Lernadzor, and Geghi Administrative Units.



On top of the above-mentioned ESIA package, the Project ESIA Leaflet was prepared prior to the consultation meetings and disseminated during them (for the ESIA Leaflet refer to the stand-alone ESIA Disclosure and Consultation Report).

Nine consultation meetings were held during the ESIA disclosure period (**Table 2**), of which:

- Six meetings took place in the Project Area - in the settlements of Sisian, Aghitu, Darbas, Lor, Kajaran, and Geghi to engage residents of the affected settlements, local and municipal authorities, regional branches of the government, local/regional civil society / non-governmental organisations, and other local stakeholders, and
- Three meetings were held in Yerevan for the central authorities, Yerevan-based civil society / non-governmental organisations and any interested stakeholders.

**Table 2. ESIA Consultation Meetings held between 21 July and 1 December 2023**

No.	ESIA meetings	Date	Topics	Materials prepared	Number of participants <sup>35</sup> (women)
1.	Sisian Community Administration Building <i>(villagers from Ishkhanasar were invited to Sisian)</i>	19 September 2023	General ESIA meeting with a focus on specific issues of interest voiced earlier (cattle passages, noise, vibration, cultural heritage, benefits)	ESIA Leaflet, simplified ESIA presentation, maps with settlement - relevant cultural heritage sites, maps with the cattle crossings, etc.	18 (9)
2.	Aghitu Administrative Unit Building <i>(villagers from Noravan, Vorotnavan and Vaghatin were invited to Aghitu, but could attend in Sisian if they wished so)</i>				20 (16)
3.	Darbas Administrative Unit Building <i>(villagers from Shamb and Getatagh were invited to Darbas)</i>				13 (6)
4.	Lor Administrative Unit Building <i>(villagers from Shenatagh were invited to Lor)</i>				16 (6)
5.	Yerevan, Ramada Hotel (Pavstos Buzand str. 15) with Zoom support <sup>36</sup>	25 October 2023	General ESIA meeting for state bodies, NGOs and any interested stakeholders	ESIA presentation with greater level of details across all E&S topics	33 (15)
6.	Yerevan, Ramada Hotel (Pavstos Buzand str. 15) with Zoom support	26 October 2023	Biodiversity meeting with relevant state bodies and NGOs	Dedicated presentation on biodiversity surveys, impacts and mitigation	26 (14)
7.	Yerevan, Ramada Hotel (Pavstos Buzand str. 15) with Zoom support	27 October 2023	Cultural heritage meeting with relevant state bodies and NGOs	Dedicated presentation on cultural heritage studies, impacts and mitigation	22 (14)
8.	Kajaran Community Administration Building <i>(villagers from Kavchut and Dzagikavan were invited to Kajaran)</i>	2 November 2023	General ESIA meeting with focus on specific issues of interest voiced earlier (cattle passages, noise, vibration, cultural heritage, benefits)	ESIA Leaflet, simplified ESIA presentation, maps with settlement - relevant cultural heritage sites, maps with the cattle crossings, etc.	27 (12)
9.	Geghi <i>(villagers from Getishen and Nor Astghaberd were invited to Geghi)</i>	2 November 2023			27 (12)

<sup>35</sup> Including the representatives of the Lenders, RD and ESIA Consultant.

<sup>36</sup> All Yerevan meetings were held in a hybrid mode (offline with the Zoom support and engagement of simultaneous interpreters to allow for attendance by non-Yerevan based E&S specialists of the EBRD, ADB and EIB, as well international staff of the ESIA consultant).

The minutes of the nine meetings, as well as the synthesis of their results, including voiced questions or suggestions and provided responses, are presented in the ESIA Disclosure and Consultation Report.

The feedback from the consultations has been incorporated in the relevant sections below, in particular: **5.3 Stakeholder Analysis**, and **5.4 Stakeholder Engagement Programme**.

## 5. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholders are defined as the various individuals or groups who i) are affected or likely to be affected (directly or indirectly) by the project (**affected parties**), or ii) may have an interest in the project (**other interested parties**)<sup>37</sup>.

### 5.1. Stakeholder Identification Methodology

The identification of stakeholders in relation to the Project was carried out based on the following criteria:

- **Impact:** the implementation of the Project may significantly affect a certain social group (stakeholders);
- **Influence:** the social group is able to significantly influence the process of Project implementation;
- **Partnership:** there are opportunities for building partnerships between the Client and the given social group; and
- **Interest:** a social group or individuals not necessarily directly affected by the Project may (or may not) show interest in it.

### 5.2. Key Stakeholder Categories and Groups

For the purposes of the stakeholder analysis, the Project stakeholders are grouped into the following two main categories:

- **Internal** stakeholders, including companies involved in the implementation of the Project, their management, staff and shareholders, as well as contractors and subcontractors involved in the project and benefiting from its implementation (investors, shareholder); and
- **External** stakeholders, including organizations and individuals not involved in the project (as employees of the RD, contractors and subcontractors), authorities involved (which will be involved) in the project approval process; the local population affected by the project; and the interested public.

The SEP is intended to cover the RD's engagement with external stakeholders. To ensure effective and tailored engagement, the external stakeholders are grouped as:

- Potentially affected parties;
- Potentially vulnerable groups;
- National authorities and government;
- Regional administrations;
- Local (community) authorities, including rural settlements; and
- Other interested parties (NGOs, mass media, academia, business, etc.).

<sup>37</sup> EBRD PR 10: Information Disclosure and Stakeholder Engagement

### 5.3. Stakeholder Analysis

A list of external stakeholder groups and their relation to and/or interests in the Project, identified on the basis of desktop review and meetings, workshops and consultations described in **Section 4**, is provided below (**Table 3**).

**Any stakeholder that is not included in the table below but wishes to receive information about the Project and its E&S aspects and impacts can approach the Client (see contacts in Section 6) with a request to be included in the stakeholders register.**

**Table 3. External Stakeholders, their Relation to / Interests in the Project and Engagement Methods**

STAKEHOLDER GROUPS	INTEREST/RELATION	COMMUNICATION TOOLS
<b>POTENTIALLY AFFECTED PARTIES</b>		
<p>The residents of the settlements that are crossed by the existing and connecting roads that will be used by Project transport or are in close proximity to the proposed road (construction sites)<sup>38</sup>:</p> <ul style="list-style-type: none"> <li><i>Sisian Community: Ishkhanasar, Noravan, Vaghatin, Vorotnavan, Shamb, Darbas, Getatagh, Lor, and Shenatagh rural settlements.</i></li> <li><i>Kajaran community: Verin Geghavanq, Geghavanq, Geghi, Getishen, Nor Astghaberd, Ajabaj, Qirs, Karut, Katnarat, Pukhrut, Lernadzor, Kavchut, Babikavan, Andokavan, and Dzaghikavan rural settlements</i></li> </ul>	<p>May be:</p> <ul style="list-style-type: none"> <li>affected by the transportation of building materials, noise, vibration, air pollution and road safety issues or other construction-related impacts.</li> <li>Interested in employment opportunities.</li> <li>Interested in benefiting from the economic opportunities that the project may bring to the communities / road side developments.</li> </ul>	<p>Public meetings Focus group discussions Disclosure of written information Mass media communication Community liaison Special purpose events (meetings) Individual meetings</p>
<p>Farmers, land and assets users or owners whose land or assets may fall within the planned road's RoW (including three intersections) and other Project components the locations of which are unconfirmed or unknown yet (spoil disposal areas, construction camp, etc), as well as those who will be affected by land use restrictions during road operations</p> <ul style="list-style-type: none"> <li><i>Sisian Community: Ishkhanasar, Sisian, Noravan, Vaghatin, Vorotnavan, Shamb, Uyts, Aghitu, Darbas, Getatagh, Lor, and Shenatagh;</i></li> <li><i>Kajaran Community: Qirs, Karut, Geghi, Verin Geghavanq, Geghavanq, Getishen, Vocheti, Nor Astghaberd, Kavchut, and Dzagikavan.</i></li> </ul>	<p>May be:</p> <ul style="list-style-type: none"> <li>affected by impacts related to land use / access restrictions, temporary or permanent land acquisition / easement.</li> <li>interested in employment opportunities.</li> <li>interested in benefiting from the economic opportunities that the project may bring to the communities</li> </ul>	<p>Public meetings Surveys Disclosure of written information Individual meetings Community liaison Special purpose events (meetings) Focus group discussions Mass media communication</p>
<p>Small and medium enterprises located near / along the existing and connecting roads or the construction sites and their employees</p>	<p>May be:</p> <ul style="list-style-type: none"> <li>affected by the access restrictions due to the Project works.</li> <li>interested in raising revenues, increased procurement due to the Project activities.</li> </ul>	<p>Public meetings Individual meetings Disclosure of written information</p>
<p>Public infrastructure operators and their employees (such as Hydropower Plants and infrastructure located close to the proposed road, gas transport and electricity transmission infrastructure operators)</p>	<p>May be:</p> <ul style="list-style-type: none"> <li>affected by the land acquisition and access restrictions due to the Project.</li> </ul>	<p>Individual meetings Workshops Disclosure of written information</p>

<sup>38</sup> This list should be revised when preparing the Transport Management Plan for the Project and determining the actual routing of Project construction traffic.

STAKEHOLDER GROUPS	INTEREST/RELATION	COMMUNICATION TOOLS
		Letters / E-mails /Calls
Services located along the Tatev-Kapan road (tourism, guest houses, catering, etc.)	May be: <ul style="list-style-type: none"> <li>affected by less demand for their services due to decreased traffic after the tunnel is commissioned.</li> <li>interested in procurement opportunities and diversification of services.</li> </ul>	Public meetings Individual meetings Disclosure of written information
Churches, cemeteries or other social or religious facilities located close to the planned road and adjacent to the existing and connecting roads and their users (including custodians over cultural heritage monuments/churches) and owners of land plots the access to which may be restricted	May be affected by the restricted access due to the Project.	Public meetings Notifications at the social facilities Individual meetings Disclosure of written information
Associated facilities (to be verified): <ul style="list-style-type: none"> <li>Owners and users of land plots to be temporary and permanently acquired/leased for such facilities</li> </ul>	May be: <ul style="list-style-type: none"> <li>affected by impacts related to temporary or permanent land acquisition / easement.</li> <li>interested in employment opportunities.</li> </ul>	Same as for affected land owners / users above
<b>POTENTIALLY VULNERABLE GROUPS</b>		
Families registered as living below the poverty level, pensioners-headed households with no support, single-parent families, female headed households with no working adults, multi-children families, people with disabilities	May: <ul style="list-style-type: none"> <li>have difficulties to access or understand the information, provide feedback on the E&amp;S aspects of the Project, or need specific assistance to assert their rights.</li> <li>be interested in temporary employment opportunities.</li> </ul> <p><i>[NB: the socio-economic studies completed as part of the ESIA and the Resettlement Plan did not identify any illiterate person or persons who would be vulnerable due to absent Armenian language skills; thus information disclosure in other languages is not required]</i></p>	Public meetings Special purpose events (meetings) Individual meetings Disclosure of written information Consultation support
Displaced people from Nagorno Karabakh residing in the settlements that are crossed by or are close to the proposed, existing and connecting roads		
Children living in the settlements that are crossed by the existing and connecting roads or that will be located close to the construction sites	May be exposed to risks related to traffic to/from the Project's construction sites and need tailored information on road safety	Focused meetings at schools Public meetings Disclosure of written information
<b>NATIONAL AUTHORITIES / BODIES AND GOVERNMENT</b>		
Ministry of Territorial Administration and Infrastructure (MTAI): <ul style="list-style-type: none"> <li>Road Department Fund (RD) and its Environmental Impacts Management Service &amp; Social Impacts and Resettlement Service</li> </ul>	<ul style="list-style-type: none"> <li>One of the key partners in charge of effective implementation of projects in the transport sphere mainly through RD.</li> <li>The project will also closely collaborate with Environmental Impacts Management Service and Social Impacts and Resettlement Service under the RD for the ESIA study and other tasks.</li> </ul>	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Ministry of Environment (MoE): <ul style="list-style-type: none"> <li>Environmental Impact Expert Examination Centre SNCO (State Environmental Review body)</li> <li>The Forest Committee and its "Hayantar" (ArmForest) SNCO with "Sisian Forestry" and "Kapan Forestry" branches.</li> </ul>	<ul style="list-style-type: none"> <li>Ensures environmental protection and rational use of natural resources. The MoE, through its key departments, will have administrative authority over the project approval processes in compliance with environmental protection legislation.</li> <li>Is in charge of controlling the State EIA</li> </ul>	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls

STAKEHOLDER GROUPS	INTEREST/RELATION	COMMUNICATION TOOLS
The Inspectorate for Nature Protection and Mineral Resources.	Review as well as for environmental law enforcement within the Project implementation. <ul style="list-style-type: none"> <li>Is in charge of forestry management.</li> <li>Interested in exploring a possibility to use the Voghji Tailing Facility as a spoil disposal area (SDA) or to use spoil for recultivation works.</li> </ul>	
Cadastre Committee	Maintains state registry of real estate, promotes the development and implementation of land policy. Cooperation with the Committee is important in relation to land acquisition	Consultation meetings E-mails / Letters / Phone calls
Ministry of Education, Science, Culture and Sports; Sisian History Museum and Kapan History Museum, both under the Ministry of Education, Science, Culture and Sports	<ul style="list-style-type: none"> <li>In charge of historical and cultural sites in Armenia.</li> <li>interested in avoiding impacts on local historical and cultural sites (NB: the 2019 design and supplementary 2022 surveys revealed 76 cultural heritage sites in the Project area)</li> <li>will be engaged in the EIA and construction permitting processes, and in authorising detailed cultural heritage studies to be conducted prior to construction.</li> <li>Interested in potential chance finds during the Project construction.</li> </ul>	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Ministry of Health	One of the key stakeholders in terms of reviewing the Project's potential impact on public health and safety.	Public meetings Disclosure of written information
Zangezur Biosphere Complex (includes Zangezur State Reserve).	<ul style="list-style-type: none"> <li>One of the largest protected areas in the Region;</li> <li>interested in close cooperation with the Project in order to avoid impacts on the protected area and on biodiversity in the region, in general</li> </ul>	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Ministry of Emergency Situations (Rescue Service; National Centre of Technical Safety SNCO)	Involved in approving the technical provisions in compliance with the existing regulations.	Public meetings Disclosure of written information
Council for Intangible Cultural Heritage Safeguards issues & Department for Protection of Historical and Cultural Monuments	May be interested in being involved in consultations on the value and significance of Intangible Cultural Heritage and possible impacts of the Project thereon	Workshops Disclosure of written information E-mails / Letters / Phone calls
Ministry of Defence	Interested in cooperation with the Project and sourcing suitable spoil material	Workshops Disclosure of written information E-mails / Letters / Phone calls
<b>SYUNIK REGIONAL ADMINISTRATION</b>		
<ul style="list-style-type: none"> <li>Urban Development Department</li> <li>Transport and Road Construction Division</li> <li>Local Government and National Executive Authorities Department</li> <li>Development Projects and Analysis Division</li> <li>Land State Inspectorate</li> </ul>	Key stakeholder in terms of consultations on the measures to be implemented on the regional level. The regional Administration carries out inspectorate, inventory and assessment as well as control and monitoring over the Project's progress and its impact on the region on many levels.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
<ul style="list-style-type: none"> <li>Family, Women and Children's' Rights Protection Department</li> </ul>	Important in terms of making sure that the children's rights are protected if the	

STAKEHOLDER GROUPS	INTEREST/RELATION	COMMUNICATION TOOLS
<ul style="list-style-type: none"> <li>Department of Education, Culture and Sports</li> </ul>	parents will have to change their children's school due to the road construction.	
<b>LOCAL AUTHORITIES</b>		
Sisian Community <ul style="list-style-type: none"> <li>Urban or socio-economic development division</li> <li>Environment, agriculture and development programs division</li> </ul> Kajaran Community <ul style="list-style-type: none"> <li>Urban or socio-economic development division</li> <li>Environment, agriculture and development programs division</li> </ul>	<ul style="list-style-type: none"> <li>Will be engaged in working directly with the affected population, communicating the Project aim to the residents, organising public hearings and information disclosure, gathering the residents' concerns and suggestions as well as mitigating miscommunications.</li> <li>Possess data on the population, land tenure status, social and economic conditions of the household, etc.</li> <li>Expect improvement of socio-economic conditions of the community.</li> <li>Interested in understanding the Project's possible negative and positive E&amp;S impacts.</li> <li>Interested in possibility to use compensatory tree-planting to create green spaces and to use spoil material for community purposes.</li> <li>Interested in developing the road-side infrastructure along the operational road.</li> </ul>	Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls
Representatives of Kajaran Community Head in Geghi and Lernadzor Administrative Areas;  Representatives of Sisian Community Head in Ishkhanasar, Aghitu, Noravan, Vaghatin, Vorotnavan, Darbas (Darbas & Shamb settlements), Lor, Shenatagh settlements/administrative areas.	<ul style="list-style-type: none"> <li>Will be engaged in working directly with the affected population, communicating the Project aim to the residents, organising public hearings and information disclosure, gathering the residents' concerns and suggestions as well as mitigating miscommunications and supporting land/assets acquisition (if any).</li> <li>Possess data on the population, land tenure status, social and economic conditions of the household, etc.</li> <li>Expect the local population to benefit from service development (retail, catering and accommodation) and temporary employment</li> </ul>	Joint site visits Public meetings Private meetings E-mails Letters / Disclosure of written information Phone calls
<b>CIVIL SOCIETY / NON-GOVERNMENTAL STAKEHOLDERS</b>		
<p><b>National NGOs:</b> Armenian Women for Health and a Healthy Environment (AWHHE), Birds of Armenia (BoA) Project, Acopian Center for the Environment (ACE), CENN (Caucasus Environmental NGO Network) - Armenia office, Armenian Birdwatching Association, (AWP) WWF Armenia, ECOLUR Information Network, ICOMOS-Armenia, Hazarashen Armenian Center for Ethnological Studies (UNESCO accredited NGO), Armenian Architecture Research Foundation, Regional Center for Cultural Heritage, "Trails for Change" tourism NGO, Sustainable Tourism Development in Armenia NGO, and others.</p> <p><b>Regional and local NGOs and other civil society organisations, e.g.:</b> Sisian Tourism Center; Sisian Women's Resource Centre Foundation; Kapan Women's Resource Centre NGO, Khustup environmental NGO;</p>	<ul style="list-style-type: none"> <li>Consultations on specific topics, such as biodiversity, gender issues, or cultural heritage</li> <li>Interested in the information about the planned Project activities, its positive and negative impacts on the people and the environment.</li> </ul> <p>Close cooperation with NGOs will allow the Project to ensure smoother communication with the residents and organise more inclusive public hearings.</p>	Public meetings Workshops Disclosure of written information Letters / E-mails / Calls

STAKEHOLDER GROUPS	INTEREST/RELATION	COMMUNICATION TOOLS
Ecological Safety and Democracy NGO, ECO SIS NGO; Kajaran Condominium for gender issues, "Guides from the South" Tourism Development NGO, Syunik Development NGO, and others. <b>International NGOs or civil society organisations:</b> e.g., EU's Environment & Climate Change Mainstreaming Facility <i>The list of the NGOs and civil society organisations will be supplemented and refined in the course of the ESIA development and Project implementation.</i>		
National, regional and local media	Coordinated and regular communication with the media will be necessary to make sure the information about the updates is communicated with the local audience in due course and build trust to avoid reputation crises.	Public meetings Mass Media communication / Press releases
Academia (National Academy of Science, National University of Architecture and Construction of Armenia; Institutes of natural sciences, etc).	May be interested in the Project related E&S impacts and may be engaged by the MoE or other Ministries as advisors during the public consultations or for preparing experts statements.	Public meetings Disclosure of written information Mass Media communication
Business (mining companies, food processing, etc.)	Expect to use the new road and may be interested in the Project related E&S impacts.	

#### 5.4. Stakeholder Engagement Programme

A Stakeholder Engagement Programme is developed to ensure the most effective engagement with all identified stakeholders, to create and maintain respectful relations between the RD and stakeholders, and to prevent possible conflicts.

The preliminary Stakeholder Engagement Programme for the scoping stage was developed as part of the Scoping Report and delivered in April-May 2022.

The below Stakeholder Engagement Programme (**Table 4**) builds on the lessons learnt at the scoping stage and covers the Project design, pre-construction and construction phases.

The Programme should be revised and updated *at least* within one year after the commencement of the construction phase and then prior to commissioning the Project facilities. It provides a specific action plan with the distribution of responsibilities and a timeframe for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should also be updated.

Stakeholder engagement will continue in parallel with information disclosure and will include several components, with the aim of continuing the facilitation of meaningful consultation and provision of information on the Project and its E&S implications (**Table 4**):

- The Project **ESIA disclosure and consultations**: this component is led by the Consultant with support of the RD and local authorities. Relevant stakeholder and public consultation meetings and events followed the disclosure of the draft ESIA package (these cover the below thematic streams: biodiversity, land acquisition, cultural heritage, and cattle and agricultural vehicle passes). The locations and methods of engagement were determined taking into account the lessons learnt at the scoping stage and the COVID situation at that time. As noted above, the results of the consultations are documented in the ESIA Disclosure and Consultation Report.

- **Consultations with regards to biodiversity issues** started in April 2021 and continue to be held with the "Zangezur Biosphere Complex" SNCO (that is subordinate to the Ministry of Environment and is in charge of Zangezur State Sanctuary and other six SPAs); environmental NGOs in Armenia, including WWF Armenia, Birds of Armenia (BoA); "Hayantar" (ArmForest) SNCO and "Sisian Forestry" and "Kapan Forestry" branches; and the MoE. Ecosystem use and dependence on ecosystems discussed during the social baseline studies will be verified during the ESIA consultations. A dedicated biodiversity consultation meeting was held during the ESIA disclosure period, and the dialogue on this topic will continue.
- **Consultations within the land acquisition mechanisms and compensation approaches** held during the inception and scoping will continue during the ESIA consultations. A separate engagement process is being undertaken during the ongoing preparation of the Resettlement Plan for the Project.
- **Consultations with regards to cultural heritage issues** held during the social baseline studies and scoping consultations will continue during the ESIA consultations (including via thematic consultations). Prior to disclosure, in April 2023, a workshop was held with the Ministry of Education, Science, Culture and Sports to validate the assessment of potential impacts/risks to the registered cultural heritage sites and proposed mitigation measures. Another meeting was held with ICOMOS Armenia in May 2023. A dedicated cultural heritage consultation meeting was held during the ESIA disclosure period, and the dialogue on this topic will continue.
- **Consultations with regards to spoil disposal areas** have been ongoing since the ESIA inception stage (April 2021). They involved the local and municipal authorities, biodiversity stakeholders, and local residents. The consultations support the search for alternative / additional spoil disposal sites that would be required for the Project. Prior to disclosure, in April 2023, the Ministry of Environment was consulted on SDAs and other environmental topics. The potential use of spoil for community benefits (e.g., for conservation, recultivation, creation of green spaces, etc.) in order to minimise the amounts of spoil to be disposed was brought forward during the ESIA disclosure consultations. The dialogue on this topic will continue.
- **Special purpose events:** these events will occur prior to and/or during the construction stage and will aim at addressing the ESIA commitments and will cover the following topics, as a minimum:
  - Community health and safety (including pedestrian and road safety and pedestrian passes);
  - Job creation opportunities and challenges, and women participation in labour force;
  - Restricted access to some local facilities/roads and alternative access, and
  - Noise disturbance and spot-specific mitigation measures.

In addition to the below Programme (not part of the ESIA), the RD commissioned the national EIA procedure according to the Armenian legislation. As part of it, four rounds of EIA consultations were held according to the Armenian legislation (in April, June, August, and November 2023)<sup>39</sup>. The feedback and comments collected by the RD's national EIA consultant and by the Ministry of Environment were analysed by them and included in the final version of the EIA report<sup>40</sup>. The positive Environmental Permit ("the EIA Conclusion") was issued for the Project by the State Environmental Expertise body on 27 November 2023.

<sup>39</sup> The questions raised by the participants during the ESIA and national EIA public consultation meetings were largely similar and are covered in the ESIA Disclosure and Consultation Report.

<sup>40</sup> <http://env.am/storage/files/geghi-25-10-2023.pdf>.



**Table 4. Stakeholder Engagement Programme**

No.	Activity	Target Group	Information materials	Timeframe	Responsible party	Location	COVID-19 restrictions related communication measures
<b>Project Design and Pre-construction Stage</b>							
1.	Provision of regular updates on the Project’s news, implementation status and its E&S performance, benefits, etc.	All stakeholders	E&S information about the Project, Frequently Asked Questions (FAQs) on the Project’s E&S impacts and mitigation, press releases, announcements on mass media, social media accounts	When the Project news are available, when some milestones are achieved / construction progress made, etc.	The RD, Construction Contractor	The RD’s website <a href="https://armroad.am/en">https://armroad.am/en</a> / <a href="https://armroad.am/am">https://armroad.am/am</a> Videos on the RD’s Youtube channel TV channels, mass media, social media accounts, information boards of local authorities	Information shared on the RD’s social media accounts as Youtube video, Facebook, Twitter, Instagram, etc.
2.	Maintenance of a Project Community Grievance Mechanism Notification of the public of such mechanism and contact information of the person in charge of its implementation;  Keeping a record of the received grievances and inquiries in the special logbook(s)	Potentially affected parties, other stakeholders	Notification, information announcement  Grievance resolution materials provided to the complainant	The grievance mechanism established during the ESIA scoping stage is to be kept operational onwards; further presentations of the mechanism during the ESIA disclosure, land acquisition process, throughout the entire project	The RD (i.e., the RD officer in charge of the Grievance Mechanism implementation)	Information about the grievance mechanism on the RD’s website and Notice boards at: <ul style="list-style-type: none"> <li>• the RD’s office in Yerevan;</li> <li>• Administration buildings of:                             <ul style="list-style-type: none"> <li>○ Sisian Community and its: Ishkhanasar, Aghitu, Noravan, Vaghatin, Vorotnavan, Darbas, Getatagh, Lor, and Shenatagh rural settlements rural settlements.</li> <li>○ Kajaran Community and its Geghi and Lernadzor rural settlements</li> </ul> </li> </ul>	Registration of the grievances received through messengers e.g., Telegram, WhatsApp, IMO, etc. including anonymous ones and those shared in the RD’s social media accounts such as Facebook, Twitter, Instagram, etc.

3.	Conducting thematic consultations, if necessary, on cultural heritage issues, cattle and agricultural passes, or biodiversity issues, alternative spoil use and SDAs, planting of trees / creation of green spaces, etc.	Interested stakeholders, NGOs and specialised state bodies; and affected stakeholders (if interest is demonstrated)	Specific materials prepared for relevant topics	When planning (designing) site specific decisions	The RD	To be agreed with the stakeholders prior to the meetings / could be via online platforms	Holding conferences via internet platforms e.g. Zoom, Cisco Webex, Google Meet, etc.
4.	Disclosure of the final ESIA package: ESIA report, ESMP, ESAP, SEP, NTS, BAP, and RF, as well as the ESIA Disclosure and Consultation Report	All stakeholder	Final ESIA package: ESIA report, ESMP, ESAP, SEP, NTS, BAP, and RF, as well as the ESIA Disclosure and Consultation Report	Spring 2024, then the ESIA package will be kept disclosed during the life of the Project	The RD	The RD's website	Information shared on the RD's social media accounts such as Facebook, Twitter, Instagram, etc.
5.	Notification on the start of the construction work	Potentially affected settlements	Announcements in the mass media, press releases, social media;	Prior to the start of the construction work	The RD, local authorities	The RD's website; Notices at information boards of administrations: <ul style="list-style-type: none"> <li>Sisian Community: <i>Ishkhanasar, Noravan, Vaghatin, Vorohtavan, Shamb, Darbas, Getatagh, Lor, and Shenatagh rural settlements.</i></li> <li>Kajaran community: Geghi and Lernadzor rural settlements</li> </ul>	Information shared on the RD's social media accounts such as Facebook, Twitter, Instagram, etc.
6.	Special purpose events, e.g.: <ul style="list-style-type: none"> <li>Informing the public on the traffic safety measures applied during the</li> </ul>	Potentially affected settlements; Separate meetings with women	Announcements, bulletins, press-releases, presentation materials; Safety rules and regulations	Prior to the start of the construction works, and <b>during construction work</b> as needed	The RD, local authorities, Construction Contractor	The RD's website Information boards of the administrations: <ul style="list-style-type: none"> <li>Sisian Community: <i>Ishkhanasar, Noravan, Vaghatin, Vorohtavan,</i></li> </ul>	Information shared on the RD's social media accounts such as Facebook, Twitter, Instagram, etc. YouTube videos.

	<p>construction period;</p> <ul style="list-style-type: none"> <li>• Holding safety briefings at schools that are close to the planned construction sites;</li> <li>• Informing the public about community health and safety precaution measures;</li> <li>• Further consulting about pedestrian passes;</li> <li>• Consultations about noise disturbance and planned mitigation and other Project construction related impacts (traffic, air)</li> </ul>					<p><i>Shamb, Darbas, Getatagh, Lor, and Shenatagh rural settlements.</i></p> <ul style="list-style-type: none"> <li>• Kajaran community: <i>Geghi and Lernadzor rural settlements</i></li> </ul> <p>Meetings at schools or in the districts of the potentially affected settlement close to the planned construction sites, where relevant</p>	
7.	<p>Special purpose events on various topics, such as:</p> <ul style="list-style-type: none"> <li>• Meetings on employment opportunities and workforce qualifications, women participation</li> <li>• Restricted access to some local facilities/roads and alternative access;</li> </ul>	<p>Potentially affected settlements;</p> <p>Separate meetings with women</p>	<p>Special presentation / information materials</p>	<p>Prior to and during construction at separate road sections</p>	<p>The RD and/or the Construction Contractor</p>	<p>To be decided based on the construction schedule and community interest/needs voiced</p>	<p>Information shared on the RD's social media such as the website, accounts at Facebook, Twitter, Instagram, etc.</p>
8.	<p>Installation of information boards at construction sites and in relevant settlements</p>	<p>Potentially affected settlements</p>	<p>Information boards, grievance forms</p>	<p>Prior to the start of the construction</p>	<p>The RD, local authorities</p>	<p>Construction sites, administration buildings of:</p> <ul style="list-style-type: none"> <li>• Sisian Community:</li> </ul>	<p>Information shared on the RD's social media accounts such as Facebook, Twitter,</p>

	with the contact details of the person in charge of grievance mechanism implementation and boxes with the Public Grievance Forms			work		<i>Ishkhanasar, Noravan, Vaghatin, Vorohtavan, Shamb, Darbas, Getatagh, Lor, and Shenatagh rural settlements.</i> <ul style="list-style-type: none"> <li>Kajaran community: <i>Geghi and Lernadzor rural settlements</i></li> </ul>	Instagram, etc. with inclusion of telephone number in messengers e.g. Telegram, WhatsApp, IMO, etc.
9.	Preparation and disclosure of FAQs outlining: (a) Project summary, (b) E&S impacts, risks and opportunities, (c) mitigations already adopted/to be implemented, (d) other questions asked during the stakeholder engagement events	Potentially affected settlements; other stakeholders	Information bulletins, leaflets	Prior to the start of the construction work	The RD	The RD's website Information boards of the administrations: <ul style="list-style-type: none"> <li>the RD's office in Yerevan;</li> <li>Sisian Community: <i>Ishkhanasar, Noravan, Vaghatin, Vorohtavan, Shamb, Darbas, Getatagh, Lor, and Shenatagh rural settlements.</i></li> <li>Kajaran community: <i>Geghi and Lernadzor rural settlements</i></li> </ul>	Information shared on the social media accounts of the RD such as Facebook, Twitter, Instagram, etc. YouTube videos.
<b>Construction stage</b>							
10.	Organisation of focus groups/ individual meetings and consultations when a specific topic appears to be of concern/ misunderstood	Affected parties Any stakeholders that raise issues, or newly identified stakeholders if applicable	Specific printed or electronic materials to be prepared	Throughout the Project lifecycle when relevant	The RD, local authorities	The RD's office in Yerevan or in the settlements depending on the originator and types of questions raised Exchange of phone calls or emails	Holding conferences via internet platforms e.g. Zoom, Cisco Webex, Google Meet, etc.
11.	Updating the SEP based on its monitoring and evaluation and disclosing it	All stakeholders	Updated SEP	Regularly throughout the Project lifecycle	The RD officer in charge of the SEP delivery	The RD's website, hard copy at the RD's office in Yerevan	Sending updated SEP to interested stakeholders via email
12.	Preparation of semi-	EBRD, EIB and ADB	Report as per the format agreed with Lenders	Semi-annually during construction,	The RD	The RD/EBRD/ADB/EIB websites	n/a

	annual <sup>41</sup> and annual E&S monitoring reports on the Project			Once a year during the first five years of operation			
13.	Preparation of annual reports on the E&S performance of the Project	All stakeholders	A short summary report	Annually (counting from the start of construction) and throughout the Project lifecycle	The RD	The RD's website, Websites of the Sisian and Kajaran Communities; hard copy at the RD's office in Yerevan and administration officers of Sisian and Kajaran Communities	Sending the report to interested stakeholders via email
<b>Project Operations</b>							
	Continue with items 1, 2, 11, 12, and 13 during the Project operations. In case of rehabilitation works, re-launch the relevant items from 'Project Pre-construction' and 'Construction Stage'						

<sup>41</sup> The frequency may be intensified at the Lenders' request.

## 6. GRIEVANCE MECHANISM

As per the EBRD, EIB and ADB requirements, an effective Project Grievance Mechanism should be established by the Client as early as possible in the project development process to be aware and respond to stakeholders' concerns related to the project, especially its E&S performance, in a timely manner.

The RD formally announced and launched the Project Grievance Mechanism for external stakeholders<sup>42</sup> at the scoping meetings held in April-May 2022. The Grievance Mechanism within the land acquisition process was described to the PAPs during the Resettlement Plan consultation meetings in August-September 2022<sup>43</sup>. During the ESIA disclosure, as well as prior to commencing construction works on the Project, the RD will again inform all stakeholders about the established Grievance Mechanism.

The RD's Project Grievance Mechanism builds on the existing communication channels used at the RD and national regulations, and supplements these by specific actions needed to meet the EBRD, ADB and EIB requirements.

The Law of the RA "On Fundamentals of Administrative Action and Administrative Proceedings"<sup>44</sup> specifies that the maximum time period for the administrative proceeding shall be 30 days. The law may define special terms – shorter than 30 days or longer time periods. According to the law, applications to administrative body shall be submitted in written form and shall contain full name of an applicant (natural or legal person), address, name of administrative body to which application is submitted, etc.

The current practice of the RD is such that all inquiries, complaints and requests that are made to the RD Director's name are collected and registered in the central database and then distributed to the relevant units / departments for consideration and response provision. If inquiries, complaints and requests are received by individual RD managers under various lender-funded projects, they are registered in the receiving divisions of the RD. Following this, a decision and/or response to the inquirer/complainant is communicated through the channel specified by her/him within one month following the receipt and no later than within 15 days for applications and complaints not requiring further review and verification<sup>45</sup>.

Grievances and suggestions can be addressed to the RD using the contact details below:

<p><b>Project-related</b> inquiries and grievances can be sent to:</p>	<p><b>Mr Artur Sanoyan</b> NSRCIP Tranches 2 and 4 Project Manager, "Road Department" Fund Government House 3, Republic Square, Yerevan 0010, Armenia <a href="mailto:artur.sanoyan@armroad.am">artur.sanoyan@armroad.am</a> office: +374 10 51-13-91 (269), mobile: +374 95 111 537</p>
<p>For <b>general inquiries</b> stakeholders can approach the RD using the contacts at its website (<a href="https://armroad.am/en/contacts">https://armroad.am/en/contacts</a>)</p>	<p>"Road Department" Fund Government House 3, Republic Square, Yerevan 0010, Armenia +374 10 51-13-91 <a href="mailto:info@armroad.am">info@armroad.am</a></p>

**The residents of the villages located along the proposed road can also submit their inquiries and complaints to the heads of their respective villages** (namely, to representatives of Kajaran Community Head in Geghi and Lernadzor Administrative Areas, and to representatives of Sisian Community Head in Ishkhanasar, Aghitu, Noravan, Vaghatin, Vorotnavan, Darbas, Lor, Getatagh, and Shenatagh administrative areas). Any inquiries or

<sup>42</sup> A separate mechanism is developed to address worker grievances.

<sup>43</sup> The ESIA resettlement team maintains a grievance logbook, the content of which is regularly communicated to the RD.

<sup>44</sup> Adopted on 18 February 2004

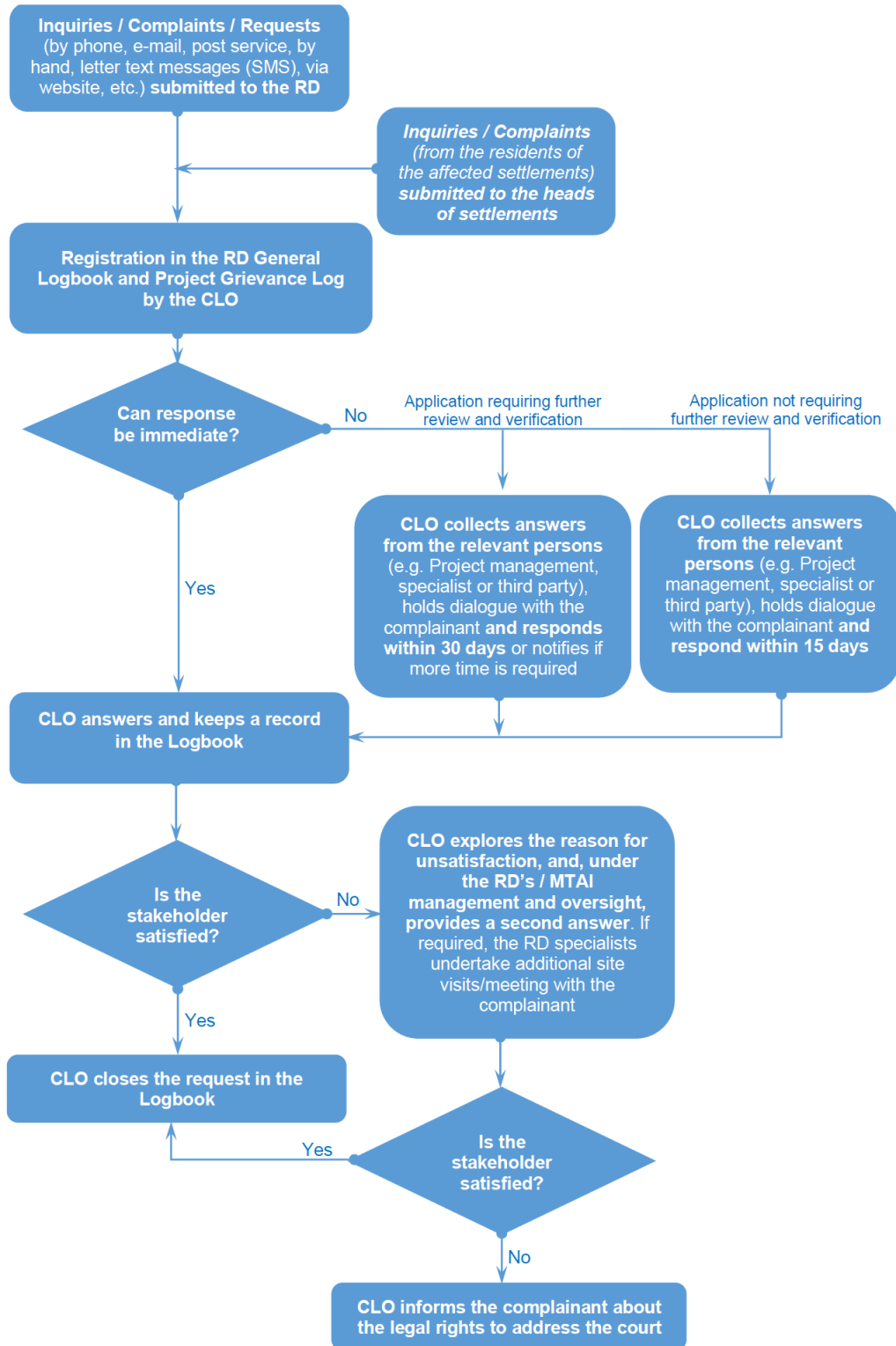
[http://www.foi.am/u\\_files/file/FUNDAMENTALS%20OF%20ADMINISTRATIVE%20ACTION%20AND.pdf](http://www.foi.am/u_files/file/FUNDAMENTALS%20OF%20ADMINISTRATIVE%20ACTION%20AND.pdf)

<sup>45</sup> <https://armroad.am/en/contacts>

concerns communicated to the local authorities (heads of villages or communities) will be immediately transmitted to the RD for review and redress.

Once the Construction Contractor and Supervision Engineer are appointed, their contact details will be disclosed, so inquiries and grievances can be channelled to them as well.

Prior to the Project construction, the RD will appoint a dedicated Community Liaison Officer who will take over the function of receiving and registering grievances and inquiries for the Project.



Source: prepared by ATMS Solutions Ltd. and Ecoline International Ltd.

Figure 4. Project Grievance Mechanism Flowchart

Currently the RD maintains the following inquiry and grievance logbooks:

- General Logbook filled in by the RD, and where information on the letter number, headline, type of the document, sender, date of receiving and responding, concern, status, term of the writ, etc. is indicated. This log-book is formed by log-books that are maintained by different divisions of the RD (such as environmental, social or technical);
- Safeguard Grievance Mechanism Logbook, which the RD typically maintains together with the Supervision Consultant and Construction Contractor when implementing Land Acquisition and Resettlement Plans for separate road section construction projects funded by international lenders (**Annex 3**).

In addition to the above communication channels, with the start of the land acquisition process, it will be possible to submit grievances and proposals to the RD in writing using a Sample Grievance Form (see **Annex 4**). Such forms will be published in electronic format on the RD's website and they will also be available in printed form at the community and local administrations and the Project construction sites.

Grievances received by phone, e-mail, mail, text messages (SMS), or messages in instant messengers will also be registered and considered.

The RD aims to protect a person's confidentiality when requested and will guarantee anonymity.

Grievances can also be submitted anonymously. If a complainant prefers to submit a grievance anonymously or through a third-party, this will be accepted, and the RD will respond to the extent feasible (e.g., via general posts on its website or notice boards of the community administration buildings respecting anonymity of an inquirer).

Based on the accumulated experience, the RD will create and maintain a separate Grievance Log for the Project. It will contain all grievances regarding the Project throughout its life cycle. The following information will be recorded in the Log:

- The essence of the received grievance / proposal / appeal;
- Date of application;
- Contact information of the sender (if the complaint was not submitted anonymously);
- Description of the actions taken (investigation, corrective action, preventive action, etc.);
- Date of decision making and closing / providing a response to the sender;
- Details of the sender's consent / disagreement with the decision and measures taken.

## 7. MONITORING, EVALUATION AND REPORTING

Successful stakeholder engagement depends on continuous effort, performance monitoring and evaluation, and adapting to changed conditions and stakeholder information needs.

In order to successfully organise, implement, evaluate, and report on stakeholder engagement activities, **NSRCIP Tranches 2 and 4 Project Manager - Mr. Artur Sanoyan** was appointed at the RD as responsible for these processes (refer to the contact details in **Section 6**). When implementing the SEP and related public disclosures, Project Manager will be supported by the RD Public Relations Officer. Project Manager will be also supported by a dedicated monitoring and reporting officer at the RD who is in charge of preparing periodic E&S reports to the lenders under the RD projects.

The following indicators will be used for monitoring and improving stakeholder engagement performance in support of the Project implementation:

- The SEP is up to date and available to the public for review/commenting;



- Actions listed in the SEP are completed in full and as scheduled;
- The topics that were discussed and the questions that were raised during the public consultations, and follow up actions, if carried out;
- Number of stakeholders' comments and suggestions received through various feedback channels with the identification of how many women and men send them if possible, and follow up actions, if carried out;
- Number of stakeholders' grievances and claims received, disaggregated by gender, if possible;
- Number of publications on the Project implementation process in local, regional, and national media;
- Key categories of grievances received by the RD or its contractors (employment, permanent or temporary land use, environmental issues, labour relations, etc.);
- Number of grievances resolved within the maximum established timeline;
- Number of grievances remaining unresolved.

All stakeholder engagement activities will be recorded in a special log ([Annex 5](#)). Such log was created at the outset of the ESIA process and will be maintained further as the Project progresses.

The SEP will be periodically evaluated by the RD in order to identify activities that might need any corrective and/or preventative measures with the purpose to improve the efficiency of its performance. In such cases the SEP should be updated and shared with the public with the amendments made.

If there are significant changes to the Project that result in additional or different E&S risks and impacts to project-affected parties, the RD will conduct additional consultations about how these risks and impacts will be mitigated.

The results of the stakeholder engagement process will be analysed monthly and quarterly, and a summary of the analysis will be included in the semi-annual and annual E&S monitoring reports submitted to the EBRD, ADB and EIB.

The E&S monitoring report will be issued semi-annually during the construction and annually during the first five years of operation. All E&S monitoring reports will be posted on the RD's and ADB's website as per ADB's requirements.

## Annex 1. SUMMARY OF STAKEHOLDER ENGAGEMENT EVENTS (APRIL 2021 TO LATE MAY 2023)

	Date	Event	Topics
	<b>General ESIA Stream – around 25 engagement events (and numerous calls and email exchanges) and around 130 interviews, FGDs and consultations as part of the socio-economic study</b>		
1.	8-10 April 2021 and	<b>Three meetings</b> with i) Syunik Regional Administration and Zangezur State Sanctuary Authorities, ii) Kajaran Community Administration, and iii) Geghi Administrative Area Administration,	Presentation of the Project team, Presentation of the Project components, Scope of E&S works to be performed within the Project, Sensitivity of the Project area, including biodiversity and cultural heritage issues; concerns, expectations and recommendation of the stakeholders
2.	20 April 2021	<b>Two meetings</b> with i) Sisian Community Administration and ii) Darbas Administrative Area Administration	
3.	8-9 December 21	<b>Three meetings</b> with i) Syunik Regional Administration, ii) Kajaran Community Administration, and iii) Sisian Community Administration	The current status of the Project; The current design of the Project; Principles, procedures, and time schedule of project implementation; ESIA and LARF related issues
4.	14 April 2022	A 30-day scoping disclosure launched. <i>Announcements published, invitations to participate in scoping meetings and to comment on the scoping report circulated, invitation phone calls made to NGOs, etc.</i>	
5.	18 -19 April 2022	<b>Five scoping preparation meetings</b> with authorities of Sisian and Kajaran Communities, Administrative heads of Lor and Shenatagh, Vorotnavan, Darbas, Getatagh, and Geghi Settlement	Delivery of the scoping report and leaflets, discussion of future scoping meetings agenda and aims, date, time and venue
6.	21 April 2022	<b>First scoping</b> consultation meeting with national state authorities Yerevan	Scoping presentation delivered and various topics discussed
7.	2-3 May 2022	<b>Five scoping consultation meetings</b> with the residents, NGOs authorities and any interested parties in Sisian, Darbas, Shenatagh, Kajaran and Geghi	
8.	23 August 2022	<b>Meeting and joint site visit</b> with Head of Lernadzor administrative unit.	Follow up on the radiation issue raised by the Head during the scoping meeting.
9.	20 July 2022 & 8 February 2023	<b>Three consultation meetings</b> with operators of public utilities - Electric Networks of Armenia CJSC, Gazprom Armenia CJSC, ContourGlobal Hydro Cascade CJSC (Shamp HPP)	Verification if there are any concerns or changes in their infrastructure since 2016 that may affect the project or can be affected by the project
10.	30 March 2023	<b>Consultation meeting</b> with Kajaran Community Administration	A possibility for arrangement a SDA in Qirs Valley
11.	6 April 2023	<b>Consultation meeting</b> with the Ministry of Environment and RD	Spoil disposal areas and other environmental topics
	<b>Biodiversity Stream – over 20 engagement events (and numerous calls and email exchanges)</b>		
12.	03 June, 22 August 2021 and phone calls / emails	<b>Consultation meetings</b> with Head of WWF Armenia	Presentation of the Project, agreement to exchange information and to coordinate next steps
13.	19 August 2021, 10 December 2021, 29 April 2023 and 7 September 2023 and phone calls/emails	<b>Consultations</b> with Head of Zangezur Biosphere Complex SNCO (under the Ministry of Environment)	Coordination on each step in the field work; definition of study areas, the kmz files with new road alignment, SDAs and intersections issued for verification of overlap with the protected areas; Feedback on proposed bridges for animals sought
14.	14 August, 30 October, 5 and 9 November 2021	<b>Consultation meeting</b> with Head of Kapan Forest Enterprise and with field worker/ camera trap expert of WWF Armenia	Coordination on the field work, definition of study areas, camera traps and so on

	Date	Event	Topics
15.	26 November 2021	<b>Consultation meeting</b> with heads of all villages located relatively close to the camera trap sites	Discussion about the camera traps installation sites and safety assurance / protection
16.	03 December 2021	<b>Consultation meeting</b> with Head of Zangezur Biosphere Complex SNCO, and staff of Zangezur Biosphere and WWF Armenia	Coordination on the field work and installation of camera traps
17.	10 May 2022	<b>Scoping consultation meeting</b> with WWF Armenia, Eco-coalition Armenia, BirdLinks Armenia NGO (in Yerevan)	Scoping presentation delivered and various topics discussed
18.	20 December 2022	EBRD-mission led <b>consultation meeting</b> with the MoE	Impacts on biodiversity receptors discussed and possible mitigation, as well as cooperation
<b>Cultural Heritage Stream – 7 consultation events [NB: in addition CH topics embedded in most of the ESIA general stream engagement events]</b>			
19.	15 July, 18 July, 18-19 August 2022	Five <b>phone consultations</b> with the heads of Darbas, Getatagh, Vorotnavan, Lor with Shenatagh, and Noravan settlements.	Verification of the local use of the cultural heritage sites and spread and types of intangible features. Identification of ongoing / planned activities to be considered in a cumulative impact assessment.
20.	23 April 2023	<b>Workshop</b> with the Ministry of Education, Science, Culture and Sports, MTAI and National Academy of Science	Validation of the assessment of potential impacts to the registered cultural heritage sites and proposed mitigation measures; need for the road re-alignment
21.	12 May 2023	<b>Consultation meeting</b> with ICOMOS Armenia	Presentation of baseline analysis for tangible and intangible cultural heritage, discussion of mitigation measures
<b>Resettlement Stream – over 20 meetings</b> <i>In addition, each household affected by land acquisition has been engaged during the Detailed Measurement Survey, socio-economic survey and census as part of the RP preparation</i>			
22.	27-28 December 2021	<b>Seven meetings</b> with heads of seven administrative areas and villagers from eight settlements that are likely to be affected by land acquisition: <ul style="list-style-type: none"> <li>• Vaghatin Settlement</li> <li>• Vorotnavan Settlement</li> <li>• Lor and Shenatagh settlement</li> <li>• Darbas Settlement</li> <li>• Aghitu Settlement</li> <li>• Geghi Settlement</li> <li>• Lernadzor Settlement</li> </ul>	RF related issues Determination that no significant changes occurred in land use within the right-of-way of the proposed road compared to 2016: no new large areas of land alienated, construction permits issued, or new large structures constructed
23.	22-23 August and 6-7 September 2022	<b>14 public consultations</b> were organized with the affected persons in the following settlements: <ul style="list-style-type: none"> <li>• Shenatagh Settlement</li> <li>• Lor Settlement</li> <li>• Getatagh Settlement</li> <li>• Darbas Settlement</li> <li>• Geghi Settlement</li> <li>• Kavchut Settlement</li> <li>• Shamb Settlement</li> <li>• Vorotnavan Settlement</li> <li>• Vaghatin Settlement</li> <li>• Noravan Settlement</li> <li>• Aghitu Settlement</li> <li>• Uyts Settlement</li> <li>• Sisian Town</li> <li>• Ishkhanasar Settlement</li> </ul>	The information leaflet distributed, participants informed about the upcoming inventory, census and socio-economic surveys, entitlements and procedures for the preparation and implementation of the RP, grievance mechanism, documents required for signing acquisition contract, etc.

Annex 2. SCOPING LEAFLET DISSEMINATED IN THE PROJECT AREA AND POSTED ONLINE IN APRIL 2022

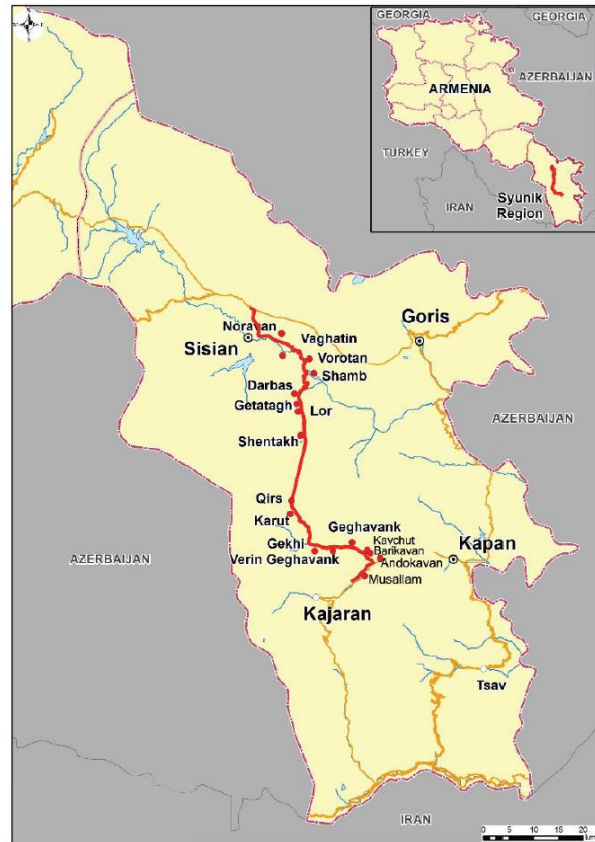
**ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT (ESIA)  
SISIAN-KAJARAN ROAD PROJECT,  
ARMENIA  
SCOPING LEAFLET**

**PROJECT BACKGROUND**

A range of new regional road corridors are currently being implemented to improve connectivity between countries in, and across Asia and Europe. Armenia is an integral part of this transport initiative and is establishing the North South Road Corridor (NSRC) connecting Iran in the south to Georgia in the north. The NSRC consists of 5 tranches, the longest of which - Tranche 4 - is divided into 3 parts (Artashat-Sisian, Sisian-Kajaran and Kajaran-Agarak). It runs from the southern border to just south of Yerevan, and within that tranche is the **Sisian-Kajaran Road** section (the Project).

The European Bank for Reconstruction and Development (EBRD) is considering financing the Project. EBRD views the Project as a Category A, and as such requires the completion of an Environmental and Social Impact Assessment (ESIA) on both the Project and all associated facilities. A consortium of environmental and social consultancies made of Ecoline International Ltd. (Bulgaria), SE Solutions Pty. (South Africa) and ATMS Solutions LLC (Armenia) has been appointed to conduct the ESIA.

The “Road Department” Fund, under the Ministry of Territorial Administration and Infrastructure of Armenia, will implement the Project.



**PROJECT COMPONENTS**

The Sisian-Kajaran Road Project is a 60-km greenfield development other than short sections at the start and end of the road where the new road will be connected to existing roads.

The new road will pass by the settlements of Aghitu, Darbas, Getatagh, Lor, Shenatagh, Qirs, Karut, Geghi, Verin Geghavan and Kavchut (heading south) and will have 27 bridges, 3 major interchanges, 14 service roads and 8 tunnels. The largest of the tunnels will be the Bergushat tunnel (8.64 km long) creating for the first time a **direct connection between Sisian and Kajaran**. The tunnel will also prevent the Project from directly affecting the Zangezour Sanctuary (a specially protected area). The road will be two lanes (one in each direction) with additional climbing lanes on steep ascents.

The proposed route was selected from three alternative routes as having the least environmental and social impacts, although it is not a cheap option.

## PROJECT PLANNING AND TIMELINE AND ESIA

The ESIA is conducted in two stages, namely Scoping and Assessment. Scoping serves to define the scope of the Assessment and requires effective stakeholder engagement. A **Scoping Report** has been prepared to document the results of the scoping stage. This **Scoping Leaflet** is a brief summary of the scoping report. Both documents (in English and Armenian) are publicly disclosed for 30 days at the website of the Road Department:

<https://armroad.am/am/safeguard/environmental-impact/el-reports> to allow the stakeholders to obtain information about the Project at its early planning stage and to provide their feedback.

Then, based on the **baseline studies**, the impacts are assessed at the Assessment stage as a function of the state and sensitivity of the existing biophysical and social environments and the risks posed by proposed project activities. The output of the assessment is the anticipated impacts and their significance for decision-making. Mitigation will be identified to manage the impacts and packaged as an **Environmental and Social Management Plan** (ESMP).

The construction of the road is expected to start in mid-2023 and take 5-6 years to complete.

## SCOPING OF POTENTIAL IMPACTS AND BENEFITS

### Environmental:

- **Air:** Dust and vehicle emissions from construction traffic and machinery and the operational roadway may cause a deterioration in air quality with associated potential impacts.
- **Water:** Spillage of hazardous materials during both construction and operations, may be transported into surface water resources, and potentially also groundwater. Excavations may result in erosion and sedimentation of surface water resources and tunnelling may affect groundwater levels and quality.
- **Physical structures and people:** Excavations and tunnelling may result in damage or collapse of structures. Construction activities, especially blasting, may result in noise driven impacts on people and vibration that would potentially threaten building structures. Noise from the operational roadway may result in negative impacts at few areas where the road will come close to villages.
- **Soil** may be contaminated by spillages of hydrocarbons and by air pollutant deposition during operations. The presence of sulphur oxides in spoil material would create a risk of acid rock drainage.
- **Biodiversity (protected areas):** Clearing of vegetation for the road would result in loss and/or fragmentation of habitat and fauna may be displaced due to the noise and general disturbance, especially blasting. Migration routes of fauna may also be affected. Noise and light from the operational road may disturb fauna and the new road may provide easier access to wildlife refuges for poaching.
- **Landscape:** Construction activities will change landscape character permanently. Spoil material from excavation and tunnelling will require dumping areas that will also influence landscape and land use.

### Socio-economic:

- **Socio-economic development:** Improved connectivity and significantly reduced travel time and costs are expected. Economic growth of Armenia will be stimulated due to better accessibility and trading opportunities with neighbouring countries. Tourism and recreation potential will be enhanced in the region and more jobs created in this sector.
- **Transport safety:** Improved road quality will lead to increased transport safety and less spending on maintenance of vehicles.
- **Employment and procurement:** Creation of new jobs will occur during the construction stage, albeit for a limited period. Regional and local procurement opportunities for goods and services will be associated with the construction stage. During the road operation new permanent jobs also can be created at roadside services (trading centres, cafeteria, refuelling stations, and so forth).
- **Land acquisition and access to assets:** Impacts will relate to temporary and permanent land acquisition owned or used by private persons or businesses (loss of grass-land, crops, plants, land plots; surface structures) and livelihood impacts (e.g., loss of income). Access between the villages and locally important sites (pastures, cemeteries, cultural monuments, etc.) may be temporarily restricted.
- **Public utilities** may be affected during the construction stage. Limited impact on public power supply can be expected as the tunnel, bridges and associated road lighting will require additional power.
- **Community health and safety:** Temporary adverse impacts on the near-by population may be caused by construction activities and traffic (emissions, noise, vibration, public health and road safety risks, etc.).
- **Occupational health and safety** risks will occur mainly during construction but also to a lesser extent during operations.
- **Cultural heritage sites** can be affected by the road elements. There is a risk of damaging chance-finds during the Project construction stage.

**YOUR VIEWS: WHAT  
ELSE TO CONSIDER IN  
THE ESIA?**

## STAKEHOLDER PARTICIPATION AND INFORMATION DISCLOSURE

A dedicated public consultation process compliant with EBRD standards is conducted. In April and December 2021, inception meetings and consultations were held with representatives of Syunik Regional Administration, Kajaran and Sisian Community Administrations to present and discuss the ESIA's scope of work, current status of the Project, road routing, and potential environmental and social impacts and opportunities. To identify potential land acquisition impacts seven further meetings were held with heads of rural settlements in Kajaran and Sisian communities potentially affected by land-take. Ongoing stakeholder engagement takes place about biodiversity matters with representatives of Zangezour Biosphere Complex, Kapan Forestry, and local authorities.

An initial identification and analysis of stakeholders has been completed and a preliminary Stakeholder Engagement Programme developed. From that a draft **Stakeholder Engagement Plan (SEP)** will be developed as per EBRD requirements. The SEP will guide further stakeholder engagement, including public hearings, disclosure of Project-related information, establishment of a grievance mechanism, and monitoring of stakeholder engagement.

As per EBRD requirements, the draft ESIA report and Non-Technical Summary, ESMP, Biodiversity Action Plan, SEP, Environmental and Social Action Plan, and Resettlement Framework will be publicly disclosed for **120 days** (in the second half of 2022). This will enable

stakeholders to understand the environmental and social implications of the Project and express their opinions. Consultation dates and meeting venues will be announced at a later date.

## LAND ACQUISITION AND ACCESS TO ASSETS

The Project requires around 327 ha of land. Of this, 33% properties are privately owned, 48% community owned, 11% state owned, and for 7% the ownership status is unknown. The remaining 1% has mixed ownership status per cadastre. Preliminarily, four houses and non-residential structures of 11 businesses may need to be relocated.

Since the Project can cause physical and economic displacement impacts (i.e., loss of assets or access to assets that leads to loss of income sources or means of livelihood), a **Resettlement Framework** was prepared for the Project compliant with applicable EBRD and national requirements. The Resettlement Framework will guide Project-related future land acquisition, compensation, and livelihood restoration activities.

As the Project progresses the Road Department will prepare a detailed **Resettlement Plan** that will identify who will be affected by the Project the impacts they may endure, establish eligibility criteria for compensation, and determine how affected people will be compensated or incomes restored. The Resettlement Plan will be disclosed and due compensation paid before any land-take or land use restriction occurs in relation the Project.

### Comments or enquiries relating to Project activities can be directed to:

**Artur Sanoyan**, NSRC Tranches 2 and 4 Project Manager,  
"Road Department" Fund (Government House 3, Republic Square, Yerevan 0010, Armenia),  
office: +374 10 511-391 (269),  
mobile: +374 95 111 537,  
e-mail: artur.sanoyan@armroad.am

OR

**Suren Gyurjinyan**, Deputy Director,  
ATMS Solutions Ltd. (1, 11 Griboedov str., Yerevan, Armenia),  
mobile: +374 91 434 760, +374 91 497 128  
e-mail: [suren.gyurjinyan@atms.am](mailto:suren.gyurjinyan@atms.am)

Your feedback on the scoping for ESIA is awaited until **12 May 2022**,  
whereas your other inquiries are welcome any time.

The Scoping Leaflet and Scoping Report are available at the website of the Road Department:  
<https://armroad.am/am/safeguard/environmental-impact/el-reports>.

Hard copies of the **Scoping Leaflet** are available at the administration buildings of Sisian, Ishkhanasar, Uyts, Aghitu, Noravan, Vaghatin, Vorotnavan, Darbas, Getatagh, Lor, Shenatagh, Geghi, Lernadzor and Kajaran administrative units. Hard copies of the **Scoping Report** are available at the administration buildings of Sisian and Kajaran Communities, and Darbas, Shenatagh and Gekhi administration units, as well as at the Road Department Office in Yerevan and ATMS Solutions Ltd. office in Yerevan

### Annex 3. LAND ACQUISITION AND RESTORATION PLAN GRIEVANCE MECHANISM LOGBOOK

T6

	A	B	C	D	E	F	G	H	I	Q	R	S	T	U
	Registration No of Letter	ID	Complain level (TPIQ, MTAI, Prime-Minister)	Type of Complaint 1. Written 2. Verbal	Received date	LARP Section ADB/RIB	LARP subsection	Community	Cadastral Lot-Code	Summ of the complain 1. Responded and partially or fully satisfied 2. Responded and not satisfied 3. Ongoing 4. Inactive response 5. Delayed 6. Other 7. Not responded	Date of response	No of responded letter	Notes	Comments
1														
2	69	739	RD	1	30.01.2018	ADB	3	Shoogh			2	14.02.2018	137	The issue is in the court, after it's decision relevant actions will be taken
3	939	737-738	RD	1	29.06.2018	ADB	3	Shoogh			1	-	-	Written response was not sent to the applicant, as relevant changes were made and contract was signed with the AP
4	13	577-579	RD	1	10.01.2019	ADB		Alaverdi			1	30.04.2019	444	After Engineers response letter 444 was sent to the applicant
5	468		RD	1	30.04.2019	ADB	2	Odzun			3	07.05.2019	468	The applicant is not considered as AP within the Project

**Annex 4. SAMPLE GRIEVANCE FORM**

Reference No. (for internal purpose only)

Full name: Name \_\_\_\_\_

Surname \_\_\_\_\_

I wish to submit my grievance anonymously

I request not to disclose my identity and contact details without my consent

Contact Details  
Please mark how you wish to be contacted (mail, telephone, Telegram, e-mail)

By Post: Please provide mailing address:  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

By telephone: \_\_\_\_\_

By e-mail: \_\_\_\_\_

Preferred Language for Communication

Armenian  
 Russian  
 Other, please specify \_\_\_\_\_

Grievance Description

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of Incident / Grievance

One-time incident / grievance (date \_\_\_\_\_)  
 Happened more than once (how many times?) \_\_\_\_\_ )  
 Ongoing (currently experiencing the problem)

What measures would you like to propose to solve your problem?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_



**Annex 5. TEMPLATE OF A STAKEHOLDER ENGAGEMENT LOG**

*Note: the log can be maintained in the Excel format*

ID/No.	Engagement Activity	Participants	Stakeholder Category	Date	Location	Initiated by	Number of participants (women / men)	Engagement purpose	Topics discussed and actions agreed	Minutes of Meeting ref.
1										
2										
3										
...										