

Ministry of Urban Development
of the Republic of Armenia

Kotayk Solid Waste
Management Project -
Environmental and Social
Due Diligence

Stakeholder Engagement Plan

July 2014



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1 Introduction

The Ministry of Urban Development (“MUD”) of the Republic of Armenia has approached the European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) with a request to prepare and finance a regional sanitary landfill in Kotayk Region. This would be the country’s first sanitary landfill. Kotayk Region was selected due to its proximity to Yerevan, with the intention of creating a demonstration project for the entire country (Figure 1). The Project would mitigate environmental hazard and would counter the pollution and adverse impact on land and water resources. The MUD intends to build seven regional sanitary landfills to serve the whole country.



Figure 1 Kotayk and other Regions (Marzes) of Armenia

The Project will include a reform of the solid waste management sector. The reform will be addressed by appropriate planning framework for waste management for Kotayk Region (Figure 2). Institution building support will focus on establishment of the operating company and development of its capacity to function as a sustainable commercial unit. Subject to due diligence, private participation in collection of waste will be established through tendering of collection services.

The Project will be the first solid waste project to be financed by the EBRD in Armenia, and would be part of the national plan to modernise the country's waste management sector. It is proposed that Sevan town located in Gegharkunik Region, but rather close the northern border of Kotayk Region and the main road, will be also involved in the Project.

The Project is expected to have an important demonstration effect and raise public awareness of solid waste management, which is important for smooth acceptance of anticipated increase of fees.

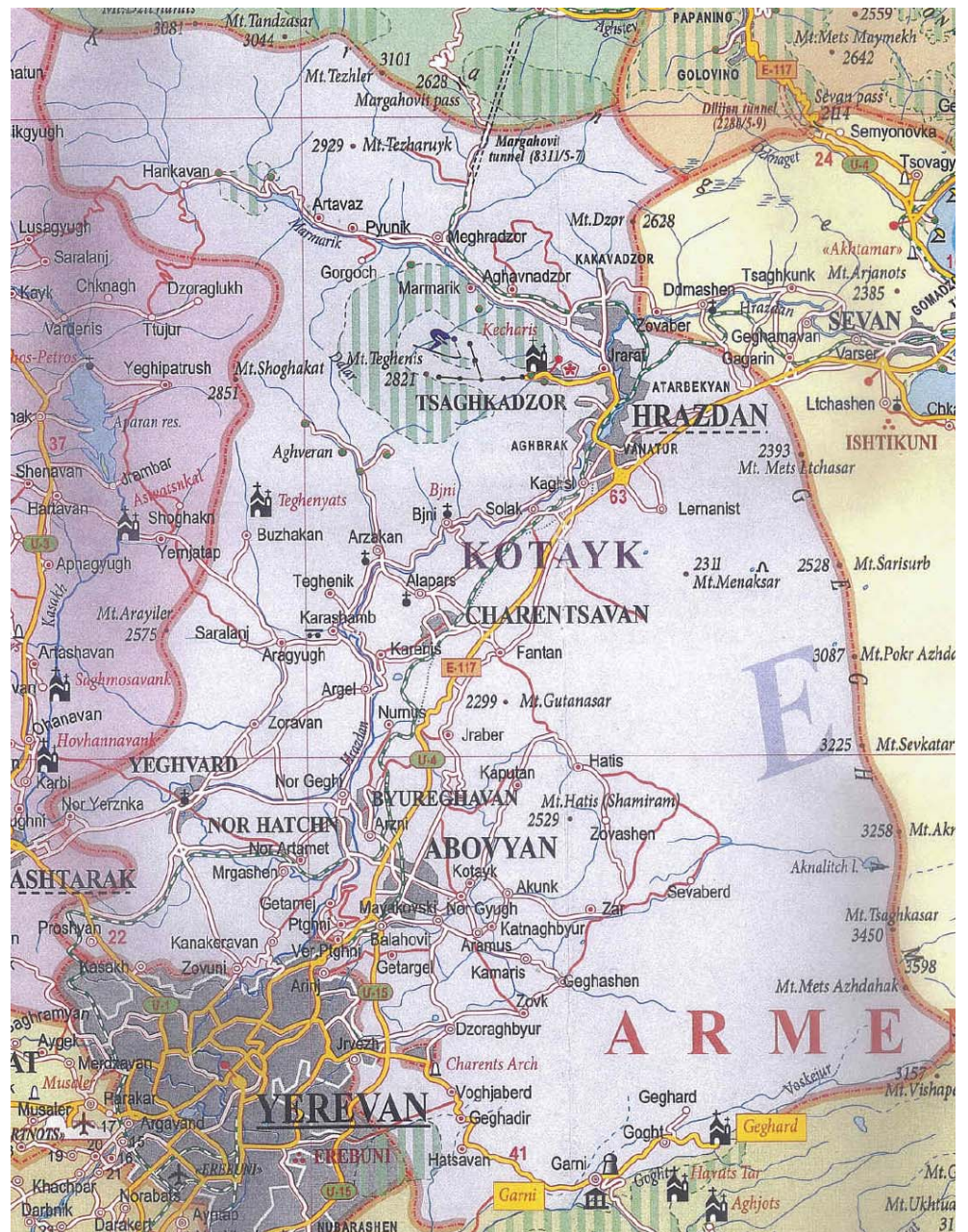


Figure 2 Map of Kotayk Region (Marz)

This Stakeholder Engagement Plan is prepared in line with the EBRD Environmental and Social Policy (2008), specifically its Performance Requirement

10. The EBRD 2008 Environmental and Social Policy and Performance Requirements are available at

<http://www.ebrd.com/about/policies/enviro/policy/2008policy.pdf>.

Stakeholder engagement means building and maintaining constructive relationships over time with both internal and external people who are affected by or interested in the Project and activities of the MUD. The SEP outlines the procedure of communication between the MUD and various stakeholders at different phases of the Project, including the ESIA and preparations, construction, operation and closure. This communication should facilitate for a meaningful consultation with the stakeholders in a culturally appropriate manner during the Project for elaborating and following the best work approach at each phase of the Project.

The goal of the SEP is to ensure the timely provision of relevant and understandable information and to provide for all stakeholders, including those who are vulnerable and/or socially excluded, opportunities for expressing their views and concerns with regard to the Project, so that they could be considered and responded by the MUD.

This SEP should be seen as an active working document. It will be revised and updated by the MUD within the Project duration. The MUD would appreciate your suggestions for improvement of the SEP and the process of communication between the MUD and the Project stakeholders.

The key contact person representing the MUD as the Project proponent is:

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Deputy Minister of Urban Development of the Republic of Armenia
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Fax +374 10 52 96 03
E-mail: av.hakobyan@mud.am

2 Legal framework for Project disclosure and public consultation

The EBRD considers information disclosure, public consultation and stakeholder engagement as an on-going process which should be started at the earliest stage of the Project preparation, and should be continued during its implementation.

The SEP should be prepared and implemented in accordance with the EBRD Environmental and Social Policy (2008), particularly with its Performance Requirement 10, and the EBRD Public Information Policy (2008).

The following international documents are also relevant for the SEP preparation:

- UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention); and
- The EU Directive 85/337/EEC, amended by the Directive 97/11/EC, on the Assessment of the Effects of Certain Public and Private Projects on the Environment.

Armenia is a party to a number of conventions and international treaties providing a framework for the public consultation process with regard to the Project, including the following relevant acts:

- *Convention on Environmental Impact Assessment in a Trans-boundary Context* (Espoo, 1991).

According to the Convention, the parties shall, to the extent possible mitigate, if not prevent the hazardous transboundary impact. According to the requirement of the Convention, the environmental impact assessment document shall include the description of the given activity, its goals, including the option of rejecting the given action, the environmental objects subject to the adverse impact of the action, list of preventing measures, etc.

- *Protocol of Strategic Environmental Impact Assessment of the Convention on Environmental Impact Assessment in a Trans-boundary Context* (Kiev, 2003).

The Protocol intends carrying out strategic ecological assessment (SEA) and obligation of parties at national and regional levels regarding this

process. According to this Protocol, projects and designs worked out for the development of various fields, and if possible, also policy and legislation shall be subject to SEA.

- *Convention on Protection and Use of Trans-boundary Watercourses and International Lakes*, 1992 (has not been signed by Armenia).

The Convention addresses prevention, limiting and reduction of trans-boundary impact, monitoring of transboundary waters, investigation and development of efficient methods for prevention, limiting and reduction of transboundary impact.

- *Water and Health Protocol of the Convention on Protection and Use of Trans-boundary Watercourses and International Lakes* (1999)

The objectives of the Protocol are to provide the population with water of a quality not posing risks for the human health, to provide access to drinking water for everybody, to implement sanitary protective measures, as well as measures providing protection of eco-systems.

The Armenian legal and regulatory framework relevant for the SEP preparation is based on the following major acts:

- Law on Environmental Expert Examination/Assessment (Environmental Impact Assessment)
- Government's Decision on scope of planned activities subject to Environmental Expert Examination (N-139, 30 March 1999).
- Law on Freedom of Information
- Law on Environmental Education of Population
- Law on Preservation and Utilisation of Immovable Monuments of History and Culture and of the Historic Environment

The *Law on Environmental Expert Examination* adopted in 1995 contains the list of 48 economic activities (types of projects) which are subject to the expertise, i.e. expert review. The Law regulates the legal, economic and institutional aspects of the environmental impact assessment of intended activities and concepts.

According to Article 4, the following intended activities are subject to EIA in the solid waste management sector:

- disposal or recycling of hazardous waste;
- establishment of waste disposal facilities.

Further on, the Law on EIA defines the procedure of notification about the intended activity (Article 6). After a proponent of an intended activity notifies the competent local authority in charge for expert assessments of all projects within the administrative area, where the intended activity is proposed to take place,

the competent authority should within 7 days inform the local community and within 15 days arrange the public hearings. The absence of comments from the community is considered as a positive response to the competent authority.

Within 30 days the competent authority shall notify the initiator of the final decision whether the EIA should be performed or not.

The next step is the submission of the documents required by the competent authority, which the latter immediately sends "to the heads of the province or the community, to the relevant state body and the affected community".

Within 5 days, the communities arrange for the presentation of the documents to the public. The hearings, with the participation of the community leaders and the initiator, shall be finalised within 30 days. If more than one community is affected, the venue of public hearings shall be determined by the competent authority.

Within 10 days of the public hearing, the leaders of the communities submit public opinion to the competent authority.

Also, the opinions of the relevant national bodies shall be sent to the competent authority within 30 days of their receipt of the documents for review.

According to Article 9, the expert resolution (conclusion) on document assessment shall be obtained from persons and/or legal entities having special certificates issued by the competent authority. The expert conclusion shall be issued within 70 days of the receipt of the EIA documents, taking into account also the opinions of the public and of the relevant public institutions. For the purpose of obtaining of clarifications, the competent authority may extend this period up to 180 days.

Within 30 days of the receipt of the expert conclusion, the competent authority is supposed to arrange the second round of public hearings. Within 20 days of the public hearings the competent authority should issue its final decision/resolution regarding the assessment.

Normally, the assessment conclusion is handed over to the project initiator within 120 days. The assessment conclusion is valid from the date of issue.

The *Law on Preservation and Utilisation of Immovable Monuments of History and Culture and of the Historic Environment* (adopted on the 11 November 1998) addresses the following spheres: (i) the concept of monuments of history and culture, (ii) the procedure of their preservation and use, (iii) the classification of monuments, (iv) the rights and responsibilities of the state and the local self-government bodies with regard to preservation and use of monuments and (v) the procedure for the state registration of monuments. It provides a framework for preservation of monuments and the historic environment and supports the study of monuments and archaeological digs.

Engagement of stakeholders and public consultation activities are also included in the Guideline for Landfill Construction and Operation adopted by the Ministry of Urban Development of Armenia in 2010.

3 Stakeholder identification

The stakeholders are the organisations and individuals, who are responsible for, interested in or affected by the proposed Project. The employees of companies providing the waste collection services are the internal stakeholders of the Project. Other parties are the external stakeholders.

The stakeholder identification is carried out during the project formulation, during the Feasibility Study and during the ESIA process.

The following groups of stakeholders have been identified so far:

- International organisations - they include the EBRD as the key financing institution for the Project, and other international organisations supporting various activities for environmental and social improvements in Armenia;
- National ministries and other governmental institutions - they have the national authority functions and responsibilities related to the Project preparation, implementation and opportunities for replication;
- Regional administration institutions in Kotayk - they have the regional public authority functions and responsibilities related to the Project preparation and implementation ;
- Municipal and local administrations in Kotayk Region and Sevan town;
- Residents of Kotayk Region and Sevan town - it is envisaged that the local communities and individual households in towns and rural areas will be affected by the solid waste management sector reform, by an expected increase of fees, but will get the improved services and thus become the Project beneficiaries; special attention is required for addressing the interests of most vulnerable groups;
- Land owners/users and residents of settlements located close to the landfill site - they will be affected by the Project activities related to establishment and operation of the regional landfill;
- NGOs - a number of local and international NGOs have valuable experience from waste management and public consultation activities in various regions of Armenia and have shown their interest to the Project;

- Armenian consulting companies, research centres - they are involved in urban planning in Armenia, in preparation and review of various projects, including waste management projects;
- General public - as a pilot international project with establishment of sanitary landfill in Armenia, the Project in Kotayk Region could be of interest for the general public in other regions; at the same time, the Project could be of certain interest for the tourists visiting Kotayk Region and Sevan town, for development of various businesses, for identification of additional stakeholders (e.g. formal and informal recyclers);
- Mass media - the mass media companies in Armenia are typically active in obtaining and presenting any news about international projects of interest for general public;
- Contractors and suppliers - various construction companies and equipment suppliers could be interested in the Project as providing them a business opportunity;
- Staff of waste management companies in Kotayk Region and Sevan town - the companies will be involved in the modernisation and reform of the waste management sector, so their staff will need information and opportunities for providing the feedback as the internal stakeholders.

List of identified stakeholders with the contact details known so far is provided in Appendix 1.

During the Project preparation and implementation the list and the roles of various stakeholders will undergo certain changes. For example, the staff of contractors involved in the landfill construction and the staff of the future regional landfill operating company should also be addressed as the internal stakeholder of the Project.

The following two chapters of the present document provide information on the already undertaken and the future activities for engagement of various stakeholders of the Project.

4 Summary of previous stakeholder engagement activities

The proposed Project is based on a long-term urban development planning process carried out by the MUD in cooperation with other ministries and consulting companies involved in development of Master Plans for municipalities in Armenia. The Master Plans are currently available for the municipalities of KotaykMarz listed in Table 4.1.

Table 4.1 Urban Development Master Plans available for communities of KotaykMarz by March 2011

No	Community	Date of the Master Plan approval by the RA Government
1	Hankavan village	19.01.2006
2	Arzakan village	19.01.2006
3	Azni village	19.01.2006
4	Artavaz village	19.01.2006
5	Charentsavan town	30.11.2006
6	Yeghvard town	09.08.2007
7	Abovyan town	09.08.2007
8	Hrazdan town	21.12.2007
9	Garni town	27.12.2007
10	Tsaghkadzor town	16.06.2006
11	Djrvej village	02.07.2009
12	Nor-Hachn town	07.11.2001

During preparation of the proposed Project for financing by the EBRD the MUD carried a number of consultations with the national, regional and municipal authorities.

Local NGOs have experience of public awareness raising campaigns in Harzan and other towns of KotaykMarz with regard to various industrial development projects. Solid waste management is among the priorities for NGO activities. The NGOs have experience of public meetings, public polls, environmental programs on TV channels and arranging the thematic hot-lines in cooperation with the TV channels. The following NGOs (listed with names of the leaders) took part in environmental actions in Kotayk region during the last years: “Hrazdan Office of Human Rights Protection” (K. Araqelyan), “Civil Academy” (J. Bubushyan), “Children Assistance Fund” (K. Araqelyan), “Mission Armenia” (V. Mamikonyan), “Women Association with University Education” Hrazdan branch (N. Hakobyan), “Armenian Help Union” Hrazdan branch (Z. Kocharyan), “VarvoghAstgh” (J. Vardanyan), “Women Public Board” (J. Vopanyan), “Forests for Future Generation” (G. Araqelyan).

The Public Environmental Information Centre (Aarhus Centre) operates in Hrazdan since 2007 with financial support from OSCE.

4.1 Meetings during the project formulation

Inspection of existing major dumpsites in Abovyan, Byuregavan, Charentsavan, Hrazdan and Yeghvard, meetings with the Kotayk Regional Administration and authorities of the five municipalities were held in September 2008 during the EBRD project formulation mission carried out with participation of the international consultant.

Information about the project was in 2009 published on website of the EBRD with invitations to expression of interest for consultancy services split in two assignments: the Feasibility Study assignment and the Environmental and Social Due Diligence assignment. The Feasibility Study was started in August 2010. The ESDD was started in March 2011. Danish consulting company COWI A/S in cooperation with the Armenian engineering company Transproject CJSC and the Armenian NGO EcoGlobe was contracted as the Consultant for both assignments.

4.2 Start-up of the Feasibility Study

Three meetings with stakeholders were carried out during start-up of the Feasibility Study. One meeting was held in Yerevan and two meetings were arranged by the MUD in Hrazdan.

The first meeting in Yerevan chaired by Deputy Minister of Urban Development Mr. A. Hakobyan was held on 03.08.2010 in the MUD office with participation of the staff of Housing Services Division of the MUD, the EBRD representative Mr. L. Sharvadze, the Deputy Governor of Kotayk Region Mr. A. Khazaryan, Head of Housing Services Department of Kotayk Regional Ad-

ministration Mr. A. Khachatryan, Head of Environmental Department of Kotayk Regional Administration Mr. K. Atoyán and the Consultant's team.

The second meeting was held with Mr. KovalenkoShakhgaldyan, the Governor of Kotayk Region. The Governor presented the Region and priorities of the Administration and welcomed the Feasibility Study team.

The third meeting was organised in Hrazdan with representatives of the MUD and the staff responsible for waste management in the urban municipalities of KotaykMarz. The list of the meeting participants is included in Appendix 2. The Project was presented and the issues related to selection of a site suitable for establishment of the regional sanitary landfill were discussed.

4.3 Meetings during the Feasibility Study

During the Feasibility Study the Consultant's team have carried out the field investigations and held a series of meetings with management of waste collection companies in major towns of Kotayk Region and in Sevan town. The meetings included interviews for collection of detailed information on the waste management practice in each specific municipality and its districts, as well as an exchange of views on the lessons learned, the present challenges and possible improvements.

The key issues discussed during the site visits included the selection of site for the regional sanitary landfill, options for waste transportation to the landfill and identification of possible alternatives.

The list of persons met during the site visits is included in Appendix 3.

Findings from the site visits are presented in the Feasibility Study Baseline Report and the Landfill Site Selection Report. A brief technical description of the Project and its alternatives is presented in the Scoping Report. The following basic options were discussed during the site visits:

- Zero alternative (no changes in the present waste management system);
- Improved collection system for mixed municipal solid waste and transportation of the waste directly to the regional sanitary landfill;
- Improved collection system for mixed municipal solid waste and transportation of waste to the regional sanitary landfill via waste transfer station(s);
- Various options of waste separation and opportunities for material and energy recovery;
- Lessons learned from earlier waste management projects in Armenia and other countries.

The detailed technical description of the preferred option selected basing on technical, organisational, environmental, social and economic considerations will be provided in the Project Proposal scheduled for completion in July 2011. The reports or their summaries and other information regarding the Project will be made available for public disclosure by the MUD. A draft document on ESIA will be disclosed and available for comments during the public consultation. The methods and procedure of the planned Project disclosure and consultation are described in the following chapter.

5 Project consultation and disclosure program

The MUD as the Project proponent will make sure that potentially affected population in Kotayk Region and Sevan town, the local community organisations, NGOs, and local governmental agencies are informed about the Project and are involved in the process of identifying the important issues and analysis of alternatives of the Project. This involvement is particularly essential during the ESIA process, which will allow incorporating the relevant recommendations into the Project design. However, the Project related information and consultation activities will be also carried out during all other phases of the Project preparation and implementation.

The information provided to the stakeholders should be sufficient at least for describing what changes will be caused by the Project, where these changes are expected and when they are expected.

For each of the project phases and each of the stakeholders or stakeholder groups identified by that time the SEP includes relevant information and consultation activities. The MUD will keep record of the stakeholder engagement activities, e.g. in a table form included in Appendix 4.

5.1 Scoping meeting in March 2011

Scoping is a process to identify the important issues and alternatives that should be examined during the ESIA. The MUD arranged a meeting with a number of Project stakeholders relevant for scoping of the ESIA process. A list of the scoping meeting participants is included in Appendix 5.

The meeting revealed interest of the local stakeholders to various aspects of the proposed Project. The questions and comments were briefly replied by the Consultant during the meeting. A summary of questions from the meeting participants is included in the Scoping Report. More detailed information on the issues raised during the scoping meeting will be provided in the Draft ESIA document.

5.2 Disclosure of information in electronic form

Information about the Project and relevant documents have been presented in Armenian and English on website of the MUD www.gov.mud.am and in Armenian on website of Kotayk Regional Administration www.Kotayk.gov.am

Documents in electronic form (PDF files) are available on request by e-mail and can be copied on memory units provided by the visitors.

5.3 Publications in the mass media

According to the information on the present mass media coverage in Kotayk Region, the local newspapers in Armenia are mainly distributed in Yerevan and do not have an audience in towns and rural areas in Kotayk, the local radio channels mainly send the music programs, so only the local TV companies are recommended by the local authorities and NGOs as a channel regularly presenting the local news and information to the general public in Kotayk Region. Majority of the households in towns and rural areas have TV sets at home and are used to see the local news programs.

According to website www.mediaforum.am, the local TV companies currently operate in Hrazdan, Nor-Hatch, Charentsavan and Sevantowns.

Internet news agencies in Armenia often provide information about key environmental issues in from various regions. The following channels can be used for publication of news regarding the Project:

- Armregions.am;
- Armenpress.am;
- Aysor.am;
- News.am;
- A1plus.am;
- Armenianow.com.

A record of the mass media publications about the Project can be maintained by MUD in the format provided in Appendix 6.

5.4 Telephone communication

People in Armenia typically prefer to ask questions and express their opinions on phone. Questions regarding the Project preparation and requests for additional information will be received during the office hours on the following phone lines:

MUD, Public Relations Division: +374 (10) 52 43 63, +374 (10) 56 03 81

Kotayk Regional Administration, Secretariat: +374 223 2 37 13

At the stage of construction and operation of the Project facilities the comments, questions and possible complaints will be addressed within the grievance mechanism as described in Chapter 6 below.

5.5 Draft ESIA presentation

The Draft ESIA report was completed and put in public domain in June 2011. Its conclusions and the ESAP will be presented to stakeholders for comments at a meeting facilitated by MUD. The meeting is tentatively scheduled for Week 38 (September 15 or 16). A Non-Technical Summary (NTS) of the ESIA document will be presented to the participants in English and Armenian.

The Armenian version of NTS and the ESIA will be presented on websites of MUD www.gov.mud.am and of Kotayk Regional Administration www.kotayk.gov.am

5.6 Disclosure of information in hard copies

Hard copies of ESIA documents in Armenian and English are available for reading during the office hours in MUD office in Yerevan and in Kotayk Regional Administration.

Hard copies of NTS in Armenian are available for reading during the office hours in the Mayor offices in Abovyan, Byuregavan, Charentsavan, Nor-Hatchn, Sevan and Yegvard.

Hard copies of the ESIA documents could be provided on request at the cost of the copying.

Printed information about the Project will be provided to all households together with the bills for municipal services.

Information boards with posters and leaflets about the Project will be established in the office of MUD, office of Kotayk Regional Administration and mayor offices in the towns.

Information leaflets about the Project will be also distributed in towns and rural areas by the staff (drivers of waste collection trucks) of the waste management companies.

5.7 Receiving and processing the comments to ESIA

The comments and suggestions to the ESIA can be submitted until 31st of October in a format provided in Appendix 7. The received filled forms will be included in a register of comments maintained by the appointed staff of MUD.

Within 1 week after receipt of a comment in the written form the author of the comment will be notified (if the contact details are provided) about the receipt of the submitted comment. The MUD staff will take care of addressing the relevant comments in the ESIA and/or the Project design documentation.

5.8 Information and consultation meetings

Public meetings will be arranged in the communities, when this is appropriate to ensure timely provision of information about the scheduled changes to the population and to get the feedback.

5.9 Stakeholder engagement prior to construction and operation

Prior to construction works a number of information and consultation meetings will be held with the staff of MUD in order to address the interests of internal stakeholders of the Company. The Company will also get training sessions and on-the-job training for the information and consultation activities with external stakeholders. An international consultant will support the Company in this work.

Public meetings will be arranged in the communities, when this is appropriate to ensure timely provision of information about the scheduled changes to the population and to get the feedback.

Particular efforts should be focused on information and meaningful consultation activities for communities of Kotayk Region and Sevan town, residents of stand-alone farms visible from the landfill site, as well as for owners/users of land adjacent to the site selected for landfill.

Brief information about the Project-related changes envisaged in the waste collection system will be provided to all customers together with the bills (in hard copies or electronic messages) for waste collection services.

Information boards with posters and leaflets about the Project will be established in the offices of Administrations in municipalities participating in the Project and in public places in villages included in the Project area.

Information posters about the Project will be also distributed in the communities by the staff (e.g. drivers of waste collection trucks) of MUD.

5.10 Stakeholder engagement during construction and operation

Information and consultation activities will be carried out in forms, which appear to be the most acceptable for addressing the stakeholder interests. Many of them could be based on lessons learned from activities carried during preparation of the Project. Among the new activities could be arrangements for Visitors Days (Days of Open Doors) providing the general public to see the sanitary landfill facility, the remediated dumpsite and the renovated premises of MUD. Photos of the facilities could be provided via websites or information boards in Kotayk and other municipalities covered by the project.

Public information and awareness raising campaign should be carried out by the Company for smooth introduction of the improved waste management system, for better transparency of billing and payment registration system and for overall improvement of revenue collection for the waste management services in Kotayknad other benefiting municipalities.

Engagement of local stakeholders will be particularly important for monitoring of closure and remediation of the existing dumpsites and prevention of waste dumping, so that all municipal solid waste is disposed at the sanitary landfill.

5.11 Updating of SEP

The Company will be responsible for keeping the SEP updated and available for the public.

The SEP should be from time to time subject for review and updated to ensure adequate engagement of the Project stakeholders during various stages of construction, commissioning and operation of the Project facilities.

The annual reports on health, safety, environment and social issues will be issued in the first quarter of each following year. These reports will be published on website (e.g. on the website of the company operating the Kotayk regional sanitary landfill) and submitted to the relevant environmental authority. The reports will include information regarding the grievances received with regard to the Project. The grievance mechanism is described in the following chapter.

6 Grievance mechanism

During all stages of the Project (FS preparation, the ESIA process, the construction, operation and maintenance, closure and after-care) the project stakeholders should be provided an opportunity to submit their comments, complaints and requests for information and to receive the feedback via a convenient communication channel. The channels and the communication procedure are the components of the grievance mechanism, which should be established and announced during the project. The mechanism can be adjusted during the Project. In this case the information on any changes should be provided to the stakeholders.

The term “grievance” implies that there may be a problem. In practice, however, the communities often find it appropriate to use the same channels to communicate not only grievances but also questions, requests for information, and suggestions. Communities may also use these channels to convey their positive feedback.

The Project proponent should keep in mind that unanswered questions or ignored requests for information have the potential to become problems and should, therefore, be addressed promptly. The person(s) who asked the question or sent the request should be notified as to who will respond and by when.

The Project SEP includes mechanisms for receiving and addressing the grievances from the external stakeholders and from the internal stakeholders.

6.1 Grievance mechanism for external stakeholders

A grievance mechanism for external stakeholders is a process focused mainly on receiving, evaluating, and addressing project-related grievances from affected communities at the level of the Project. The grievance mechanism differ from other forms of dispute resolution (e.g. courts, administrative systems, etc.) in that it offers the advantage of a locally based, simplified, and mutually beneficial way to settle issues within the framework of the relationship between the Project and the community.

Properly designed and implemented grievance management processes can benefit both the Project and communities by increasing the likelihood of resolving minor disputes quickly, inexpensively, and fairly - with solutions that reasonably satisfy both sides without taking the grievances to other (formal) dispute resolution body. Grievance mechanisms can help to identify and resolve

issues before they are elevated to formal dispute resolution methods, including the courts.

For a grievance mechanism to function effectively, it is important to define the grievance processing structure and to assign responsibilities for the mechanism's implementation and make them clear for the stakeholders.

Contact details for questions, complains and recommendations from the external stakeholders of the Project are as follows:

Ms. AniArmenakyan
Head of Division for Public Relations
Government Building 3, Republic Square, 0050 Yerevan
Tel: +374 10 56 03 81
Fax +374 10 52 96 03
E-mail: info@mud.am

A draft form for public grievance is included in Appendix 8.

The focus of the grievance mechanism on the needs of affected communities is substantiated by the fact that they are directly, and in some cases significantly, affected by project operations but often lack viable options or capacity for raising their concerns through formal structures such as the courts. This is especially true for disadvantaged groups within communities. The Project grievance mechanism provides a readily accessible means for communities to address issues involving them and the company - directly, rapidly, and at no cost to complainants.

For a grievance mechanism to be effective, all project stakeholders need to understand and support its purpose. Affected communities must be aware of and understand the grievance mechanism's benefits to them.

Depending on the Project impacts on local communities, grievances will vary by the Project stage. In many cases, grievances are minimal at the preconstruction stage, then peak during construction, and will be comparatively moderate during operation or closure. Typically, during the construction stage the scale of impacts is elevated and communities' expectations of economic benefits are on the rise.

The Project grievance mechanism must also deal with types of grievances that have not been anticipated. The Project should periodically review the adequacy of the grievance process, with the participation of communities, and agree on modifications.

The contact details of NGOs will be provided in announcement on TV, in posters and information leaflets distributed in the project affected communities during the public consultations. Questions and comments expressed during the public meetings will be recorded and addressed during the design and implementation of the Project.

6.2 Grievance mechanism for internal stakeholders

The Project will establish a grievance mechanism for internal stakeholders including employees of the waste management companies and employees of contractors involved in the Project.

6.2.1 Grievance mechanism for employees

According to section 18 of the EBRD PR 2 the MUD will provide a grievance mechanism for workers (and their organisations, where they exist) to raise their reasonable workplace concerns. The MUD will inform the workers of the grievance mechanism at the time of hiring, and make it easily accessible to them. The mechanism should involve an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides feedback to those concerned, without any retribution.

The grievance mechanism should not impede access to other judicial or administrative remedies that might be available under law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements. Section 19 of PR 2 also states that a grievance mechanism should also be made available to non-employee workers.

The formal grievance mechanism is described in the RA Labour Code (Articles 25-27). The mechanism should also be part of the employment contracts of the staff of the waste management companies. These documents regulate the roles, rights and responsibilities of the employer and the Trade Union organisation. The employees should know these roles, the terms of the collective agreement, and the contact details of the relevant Trade Union organisation Chairman.

The municipal waste collection companies and the regional landfill operation company will have internal routines for annual evaluation meetings (employee dialogue) for each of the employees.

Grievances are complaints and problems that employees raise with their employers. These may relate to various major and minor issues, e.g. how employees have been treated, actions that an employer is contemplating taking, discrimination in the workplace, more minor day-to-day disputes such as a poor relationship between two employees or a disagreement over holiday arrangements, etc.

It is important that employees have a course of action available, should they have a complaint. Procedures are necessary to ensure that everybody is treated in the same way in similar circumstances and to ensure issues are dealt with fairly, reasonably and in a timely manner. Basic principles of grievance mechanism for employees are presented in Table 2.

Table 2 Principles of grievance mechanism for workers of companies involved in the Project

Principle	Description
Worker and manager awareness	All workers should be informed about the grievance mechanism at the time they are hired, and details about how it operates should be easily available, in employee handbooks for example. Employees must know to whom they can turn in the event of a grievance and the support that is available to them. Managers who will be dealing with grievances, and workplace representatives who may become involved, should all be familiar with the procedures and receive training in implementing them.
Simplicity and necessity	Procedures should be kept as simple as possible, avoiding unnecessary administrative stages. Lodging a formal grievance should be seen as a last resort, after informal methods have been exhausted. Ordinary, day-to-day issues can often be better dealt with informally in meetings with line managers. If discussions with line managers fail to resolve the issue, it is still possible to pursue an informal approach without triggering a formal procedure. For example, an HR manager could host an informal meeting or discussion. However, the mere presence of an employee 'suggestions box' does not constitute an adequate alternative to a clear and direct grievance mechanism, whose operation and findings should be clear to employees.
Keeping it up to date	The process should be regularly reviewed and kept up to date by referencing any new statutory guidelines, changes in contracts or representation.
Confidential and impartial process	The process should ensure that a complaint is dealt with confidentially. While procedures may specify that complaints should first be made to the employees' line manager, there should also be the option of raising a grievance first with an alternative manager, for example, a human resource (personnel) manager. The findings of the process should be explained clearly to all parties.
Non-retribution	Procedures should guarantee that any employee raising a complaint will not be subject to any reprisal.
Reasonable timescales	Procedures should allow for time to investigate grievances fully, but should aim for swift resolutions. The longer a grievance is allowed to continue, the harder it can be for both sides to get back to normal afterwards. Time limits should be set for each stage of the process, for example, a maximum time between a grievance being raised and the setting up of a meeting to investigate it.
Right of appeal	An employee should have the right to appeal to a higher level of management if he or she is not happy with the initial finding.
Right to be accompanied	In any meetings or hearings, the employee should have the right to be accompanied by a colleague, friend or union representative.

Principle	Description
Sensitive to vulnerable staff	The procedure should be designed so that employees that may feel particularly vulnerable (e.g. women, ethnic/religious minorities, migrant workers, younger workers, employees with disabilities) are not deterred from lodging a grievance. The process for lodging grievances should be discreet to allow employees make a grievance without everyone else knowing. It is also good practice to have both a male and female staff member available for receiving and processing grievances so that employees can make a choice whom to speak to. Confidentiality and non-retribution (see above) are particularly important to the most vulnerable staff who may, therefore, wish to remain anonymous. However, grievances lodged anonymously may prevent the employer from resolving the matter and providing feedback. Nevertheless, employees wishing to lodge grievances anonymously should be allowed to do so.
Keeping records	Once a grievance has been raised formally, it is important that proper written records are kept, to aid transparency and allow for any review of the process or decision to be undertaken. If possible, the original complaint should be in writing. The employer's response should also be recorded. Any actions taken along with reasons should also be recorded, for example, a grievance hearing and finding.
Relationship to collective agreements & regulation	Grievance procedures may be included in collective agreements. Grievance processes are set out in the Labour Code. Workplace processes should be compliant with these.

Workers of the municipal waste collection companies and of the regional land-fill operation company, as well as the workers of the contracted companies could submit their questions, complains and recommendations (e.g. in a form included in Appendix 9) to the Department for Housing Services of Kotayk Regional Administration (*to be confirmed by MUD*):

Mr. ArshavirKhachatryan
 Head of Department for Town-planning
 Kotayk Regional Administration
 Kentron District, Hrazdan City
 Tel.: /0223/ 2-36-63, 2-73-37, Mobile: 093 599 599
 e-mail: gaghshin.kotayq@mta.gov.am

Mr. VardanKalantaryan
 Specialist of Department for Housing Services
 Kotayk Regional Administration
 Address: Kentron District, Hrazdan City

Tel: 0223 2 19 46 Mobile: 091 763 546

The comments addressed to the above persons can be submitted by e-mail kotayk@mta.gov.am of Kotayk Regional Administration.

6.3 Grievance mechanism for Contractors

Availability of a grievance mechanism for contractor employees and for the affected communities can be considered as an indicator of good practice and corporate social responsibility. Availability of the grievance mechanism could be included as a requirement for selection of contractors, as this is recommended in the EBRD labour requirements for the construction contractors (see Appendix 10).

6.4 Monitoring and evaluating the grievance mechanism

Depending on the extent of Project impacts and the volume of grievances, monitoring measures can be as simple as tracking the number of grievances received and resolved. Grievance records should provide the background information for regular monitoring, both informal and formal. Therefore, even a simple tracking system should provide an opportunity to aggregate information and recognize patterns in the grievances the Project receives, and how they are being resolved.

Appendices

Appendix 1 List of stakeholders for Kotayk SWM Project

(to be regularly updated during the Project preparation and implementation)

Name of stakeholder	Contact person	Contact details
International organisations		
EBRD	Environment and Sustainability Department Environmental and social enquiries	One Exchange Square London EC2A 2JN United Kingdom Tel: +44 20 7338 7158 Fax: +44 20 7338 6848 Email: environmentandsocial@ebrd.com
EBRD Tbilisi Resident Office	Levan Sharvadze, Associate Banker, Municipal & Environmental Infrastructure	6, Marjanishvili Str., 0102, Tbilisi, Georgia Tel: +995 32 447400 Fax: +995 32 920512 E-mail: sharvadl@ebrd.com
EBRD office in Armenia	Head of office	Citadel Business Centre 105/1 Teryan Street 4th Floor, Suite #407 0009 Yerevan Tel: +37410 51 48 05 /06/07/08/09 Fax: +37410 51 48 10
UNDP/GEF Climate Change Information Centre of Armenia	Project Coordinator Diana Harutyunyan	Government Building #3, room # 533 Republic Square, Yerevan 0010 Tel: +374 (10) 583920, 583932 Fax: +374 (10) 583933 E-mail: infocenter@nature.am , climate@nature.am
EC Delegation to Armenia	Head of Delegation	21 Frik Street, Yerevan 0002, Armenia Telephone: +374 (10) 54 64 94 Fax: +374 (10) 54 64 95 Emails: Delegation-Armenia@ec.europa.eu http://www.delarm.ec.europa.eu
European Neighbourhood and Partnership Instrument East	Armenian Coordinator of Waste Governance Project in Armenia Artem Kharazyan	E-mail: artemduke@yandex.ru
USAID office in Armenia	USAID Mission Director Jatinder Cheema	Tel: (3741) 464-700 Fax: (3741) 464-728 Armenia.usaid.gov

Name of stakeholder	Contact person	Contact details
UN office in Armenia	Head of UN office: DafinaGercheva	14 PetrosAdamyanyan str., Yerevan, 0010, Armenia Tel: +(374 10) 566073
UN office in Armenia	UNDP Environmental Governance Portfolio Manager Armen Martirosyan	14 PetrosAdamyanyan str., Yerevan, 0010, Armenia Tel: +(374 10) 566073 (104 ext.)
UN office in Armenia	Head of UNIDO Operations Anahit Simonyan	14 PetrosAdamyanyan str., Yerevan, 0010, Armenia Tel: +(374 10) 566073 (205 ext.)
World Wild Fund for Na- ture – Armenian Branch	Director: Karen Manvelyan	7 Ler kamsar str., 0019, Yerevan, Armenia Tel: + (374 10) 260424
Governmental organisa- tions		
Lake Sevan Commission	Chairman of the Commission Vladimir Movsisyan,	4, Marshall Baghramyanave., 0019, Yerevan, Tel: +(374 10) 569269
Lake Sevan Commission	Adviser to the RA President A.Hakobyan	Mob: +374 91 34 16 22
State Committee of the Real Estate Cadastre under RA Government	Head of Committee: ErvandZakharyan	7 Arshakunyats str., Yerevan, 0023, Armenia Tel: + (374 10) 587828
RA Ministry of Territorial Administration (MTA)	Minister Armen Gevorgyan	2 Government Building, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 525274
State Committee on Wa- ter Management (MTA division)	Head of Committee AndranikAndreasyan	Address: 13 Vardanants str., Yerevan, 0010, Armenia Tel: +(374 10) 540909
Kotayk Regional Admini- stration (MTA division)	Regional Governor: Aram Harutyunyan	Kentron District, Hrazdan City, Armenia Tel: +(374 223) 23663 or 27337
Gegharkunik Regional Authority (MTA division)	Regional Governor: Never Poghosyan	36 GrigorLusavorich, Gavar City, Armenia Tel: +(374 264) 21045
RA Ministry of Nature	Minister	Government Building 3, Republic square, 0010, Yerevan, Armenia

Name of stakeholder	Contact person	Contact details
Protection (MNP)	Aram Harutyunyan	Tel: +(374 10) 521099
RA Ministry of Nature Protection (MNP)	Head of Legal Department Arthur Hambardzumyan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 523783
RA Ministry of Nature Protection (MNP)	Head of Department of Hazardous Substances and Waste Policy Anahit Aleksandryan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 585326
RA Ministry of Nature Protection (MNP)	Head of Department for Foreign Relations Margarita Korkhmazyan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 585469
RA Ministry of Nature Protection (MNP)	Head of Department of Environmental Strategic Programs and Monitoring Ashot Harutyunyan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 567535
RA Ministry of Nature Protection (MNP)	Head of Department of Underground resources and Land Protection Policy VigenAvetisyan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 557300
Water Resources Management Agency (division of MNP)	Head of Agency Alfred Nersisyan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 540867
Bio-resources Management Agency (division of MNP)	Head of Agency ArtashesZiroyan	1/3 Byuzand str., 0010, Yerevan, Armenia Tel: +(374 10) 527952
State Environmental Inspectorate (division of MNP)	Acting Head of Inspectorate AleksandrSahakyan	3 Government Building, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 523799
Environmental Impact Monitoring Centre SNCO (organisation under MNP)	Director BaghdasarSngryan	Address: 29 Komitasave. Yerevan, 0012, Armenia Tel: +(374 10) 272007
Environmental Expertise SNCO (organisation under MNP)	Director AndranikGevorgyan	29 Komitasave. Yerevan, 0012 Tel: +(374 10) 220218
Armenian State Hydro-meteorological and Monitoring Service SNCO (organisation under MNP)	Director LevonVardanyan	14 Leo str, Yerevan, 0002, Tel: +(374 10) 530316

Name of stakeholder	Contact person	Contact details
Information Analytical Center SNCO (organisation under MNP)	Director GagikHovhannisyan	Government Building 3, Republic square, 0010, Yerevan Tel: +(374 10) 542142
Waste Researches Center SNCO (organisation under MNP)	Director Anna Azaryan	46 Charentsstr, Yerevan, 0025 Tel: +(374 10) 554835
Ministry of Healthcare (MH)	Minister HarutyunKushkyan	3 Government Building, Republic square, 0010, Yerevan, Tel: +(374 10) 582413
State Hygiene and Anti-Epidemic Inspectorate (of MH)	Head of Inspectorate	Address: 10 G. Hovsepyan str., Yerevan, 0047, Armenia Tel: +(374 10) 520660
Ministry of Energy and Natural Resources	Minister Armen Movsisyan	Government Building 2, Republic square, 0010, Yerevan, Armenia Tel: +(374 10) 521964
Ministry of Labour and Social Affairs	Minister Arthur Grigoryan	Government Building 3, Republic square, 0010, Yerevan, Armenia Tel: + (374 10) 526831
Ministry of Economy	Minister TigranDavtyan	5 M.Mkrtchyan str., Yerevan, 0010, Armenia Tel: + (374 10) 526134
Ministry of Agriculture	Minister Sergo Karapetyan	Government Building 3, Republic Square, 0010, Yerevan, Armenia Tel: +(374 10) 524641
Regional Administration in Kotayk Region		
Kotayk Regional Administration (Marzpetaran)	Governor (Marzpet) Aram Harutyunyan	Kentron District, Hrazdan City Tel.: /0223/ 2-36-63, 2-73-37 URL: http://kotayk.gov.am E-mail: kotayk@mta.gov.am
Municipal Infrastructure Department	Head of Department ArshavirKhachatryan	Tel: +374 223 2 19 46 Mob: +374 (93) 599 599 qaghshin.kotayq@mta.gov.am
Nature Protection Department	Head of Department KamoTumoyan	Mob: +374 (93) 21 55 77
Department for Land Resources and Real Estate	Head of Department LevonPetrosyan	Mob: +374 (91) 42 53 24

Name of stakeholder	Contact person	Contact details
Municipal authorities in Kotayk Region		
Hrazsdan Town Administration	Deputy Mayor M.Mikaelyan	Kentron District, Hrazdan City Tel +374 223 2 39 64 Mob: +374 93 77 70 82
Abovyan Town Administration	Head of Department for Housing Services and Real Estate Vladimir Ivanyan	Tel: +374 222 2 16 33 Mob + 374 93 51 90 10
Byreghavan Town Administration	Mayor HakobBalasyan	Tel +374 (222) 6 32 36 Mob: +374 (91) 21 28 48 balasyanh@mail.ru
Charentsavan Town Administration	Mayor	
Nor-Hatchn Town Administration	Mayor GagikMatevosyan	Mob: +374 98 28 77 77 nor-hatchn-meria@mail.ru
Tsaghkadzor Town Administration	Deputy Mayor H.Mkrtchyan	Tel: +374 93 90 10 20
Yeghvard Town Administration	Head of Department for Housing Fond V.Vardanyan	Tel: +374 224 2-24-60 Mob: +374 99 40 38 31 vardan48@yahoo.com
Gegashen village administration	ArturOganesyan Mayor of Geghashen Village	Mob +374 98 42 74 55
Aramus town administration	GairNikogosyan Mayor of Aramus town	Mob +374 91 42 09 08
Regional Administration in Gegharkunik Region		
Urban Development Department	Head of Department D.Hovannisyan	36 GrigorLusavorich, Gavar City, Armenia Tel: +(374 264) 21045 Mob: +374 91 35 16 42
Municipal authorities in Gegharkunik Region		
Sevan town	Mayor	
NGOs		

Name of stakeholder	Contact person	Contact details
REC Caucasus	Head of Armenian branch	Rec-caucasus.am
NGO CENN	President Nana Janashia	14B, Chonkadze St. 0107, Tbilisi, Georgia Tel: +99532 92 39 46 Fax +99532 92 39 47 E-mail: info@cenn.org, www.cenn.org
NGO EcoGlobe	General Director NuneDarbinyan	Tel/Fax +37410 221295 Mob +374 91 41 83 11 nd@ecoglobe.am nuneemail@yahoo.com
Council for Sustainable Development (of Hrazdan Town Administration)	Co-chairman Julietta Bubushyan	Hrazdan Mob+374 91 45 61 34
NGO Civil Academy	Leader Julietta Bubushyan	Hrazdan, Mob+374 91 45 61 34
Hrazdan Branch of Association "For Sustainable Human Development"	Leader Julietta Bubushyan	Hrazdan, Mob+374 91 45 61 34
Environmental Information (Aarhus) Centre in Hrazdan town	Director	Marzpetaran building, Kentron District, Hrazdan
NGO Association "For Sustainable Human Development"	President of Association KarineDanielyan	Tel: +374 10 52-23-27 Tel: +374 91 36 58 86
NGO Armenian Women for Health and Environment	Leader of Division for Hygienic and Environmental Risks LilitSimonyan	Tel: +374 10 52-36-04 office@awhhe.am
Commercial companies (contractors, industries, recyclers, service companies, local SME, etc.)		
Hrazdan Cement Plant		Hrazdan
Hrazdan Power Plant		Hrazdan
Service sector SME (shops, catering, workshops, transport companies etc.)		Municipalities of Kotayk Region

Name of stakeholder	Contact person	Contact details
Komandos Ltd (recycling of metals)		Arinj village
Saranist (recycling of glass) - branch of Arm-glass	Director	Byuregavan Tel: +374 222 33 597 saranist@saranist.com www.saranist.com
Narsan JSC (recycling of plastics)		Yerevan
VazgenAbgaryan Ltd (recycling of paper)	Director	Yerevan Tel: +374 91-41-17-85
Consulting companies		
Armproject JSC	Director GrigorAzizyan	Yerevan, Tel: + 374 10 57 58 95, Mobile: +374 91 41 51 13
Transproject CJSC	Director Eduard Martirosyan	"Transproject" Institute CJSC 23 David Anachkt, Yerevan, Tel + 374 10 24 16 42, Fax +374 10 24 11 91 Mobile +374 94 25 68 77 E-mail transproject@mail.ru
Owners and users of areas located close to Project sites in Kotaykmarz		
Hrazdan Cement Plant	Manager of clay quarry located close to Hrazdan dumpsite	
Owner of a farm close to Yeghvard dumpsite	VazgenGrantovichDanielyan	Yeghvard, Mob: +374 091 34 54 65
Management of irrigation systems		
Waste pickers		
Residents of Kotayk Region and Sevan town		
Households - customers of waste collection companies	Head of revenue collection centre for housing services	

Name of stakeholder	Contact person	Contact details
Household Association of Condominium 1 in Nor-Hatchn	Chairman YourikHarutyunyan	Tel +374 224 4-28 75 Mob +374 94 6128 16
Household Association of Condominium 3 in Nor-Hatchn	Chairman Vladimir Mesropyan	Tel +374 224 4 26 80
Educational, healthcare, cultural institutions	Heads of Departments for education, Departments for healthcare, Departments for culture	
General public in Armenia and other countries		
Yerevan residents traveling to Sevan for weekends during summer months		Websites and information boards in Sevan town
Tourists visiting resorts in Kotayk		Websites and information boards of hotels in Armenian, Russian and English
Armenian Diaspora		Armenian websites in Armenian and English
Mass media		
AchnTelevidenie (TV company)	Director KamoTadevosyan	1 TumanyanStr, Nor-Hatch Tel (374224) 4 13 31, (374224) 4 11 65, (37493) 51 45 56, (37493) 10 04 54
Lusalik (TV company)	Director Maxim Melikyan	House of Culture, Karen Demirchyan square, Charentsavan, Armenia Tel: (374226) 4 48 88, (374226) 4 41 84, (37491) 50 28 82 (+374 226) 4-34-50 E-mail: lusaliktv@mail.ru
Hrazdan (TV company)	Director MnatsakanHarutyunyan	Marzpetaran 7th floor, Central Region, Hrazdan Tel: (+ 374 223) 2-02-92, (+374 223) 2-67-06, 2-77-01, 2-39-25, (+374 10) 54-54-67 (37493) 31 23 58, (37494) 00 24 32 E-mail: hrazdantv@mail.ru
STV (TV company)		6, SargisSevanecu str.6, Sevan, 1505 Armenia Tel: (+374 261) 2-56-58, +374-93-490004, +374-93-233405 Fax: +374-261-24717

Name of stakeholder	Contact person	Contact details
		E-mail: stv1@media.am, stv1@list.ru http://www.stv1.am
Employees of waste management companies in municipalities		
Abovyan Enterprise for Housing Services	Director SosMelikdjanyan	Mob +374 91 41 73 09
Nor Hach municipal services enterprise	Director, A. Dumanyan	
"Hachn – 1" Ltd.	Director YurikHarutyunyan	Tel +374 224 4-28 75 Mob +374 94 6128 16
Byuregavan Municipal Enterprise for Landscaping and Vegetation Management	Director Samvel Petrosyan	Mob +374 93 78 18 08 Mob +374 91 78 18 08
Byuregavan City Cleaning OJSC	Director Valery Balasanyan	Mob +374 77 57 79 46
Barmak Ltd, Charentsavan	Director A.Tadevosyan	Tel 4-17-85 Mob +374 94 108 300
Municipal Service OJSC, Tsaghkadzor	Director V.Balasanyan	Tel: +374 77 577 946
Sevan City Cleaning Enterprise	Director Lyova A. Grigoryan	Tel +374 261 2 30 57, Mob +374 91 02 26 27
Employees of regional waste management company		

Appendix 2 List of participants of the Feasibility Study start-up meeting in Hrazdan

**Participants of the Project meeting in KotaykMarz
Hrazdan, 04.08.2010**

Participant name	Position
RA Ministry of Urban Development	
VahagMinasyan	Advisor to Deputy Minister A.Akopyan
Samvel Srapyan	Head of Housing Fund and Utility Division
KotaykMarz	
Albert Ghazaryan	Deputy Governor of KotaykMarz
M. Gareginyan	Chief of Permanent Board of Kotayk Regional Administration (KRA)
ArshavirKhachatryan	Chief of Municipal Infrastructure Department of Kotayk Regional Administration
KamoTumoyan	Chief of Environmental Department of KRA
VardanKalantaryan	Leading specialist of Municipal Infrastructure Department of KRA
Hrazdan town	
A.Danielyan	Mayor of Hrazdan city
M. Mikaelyan	Deputy mayor of Hrazdan city
Sh. Khachatryan	Chief of municipal department of Hrazdan City Administration
G. Harutyunyan	Executive Director of "Hrazdan Supply" Ltd
A.Zackaryan	Chief of Information and Public Relations Department of Hrazdan City Administration
Abovyan town	
Vladimir Ivanyan	Chief of municipal department of Abovyan City Council
M. Melicksetyan	Director of municipal services enterprise
Charentsavan town	
V.Chilingaryan	Deputy Mayor of Charentsavan
A. Tadevosyan	Director of "Barmak" Ltd
Yeghvard town	
K. Harutyunyan	Deputy Mayor of Yeghvard
V. Muradckanyan	Chief of permanent board of Yeghvard town council
V. Vardanyan	Director of "Housing fond and office repairing"
Nor Hachn town	
Benjamin Antonyan	Chief of permanent establishment of Nor Hachn town council
A. Dumanyan	Chief of municipal services enterprise Nor Hachn
YurikHarutyunyan	Chief of "Hachn – 1" Ltd.
Byuregavan town	
AkopBalasyan	Mayor of Byureghavan town
V. Balasanyan	Director of municipal services enterprise of Byureghavan town
Tsahkadzor town	

Participant name	Position
G. Mirzoyan	Mayor of Tsahkadzor town
A. Soxomonyan	Director of “Tzachkadzor Service” Ltd.
Sevan town	
L. Grigoryan	Director of Sevan city cleaning company
COWI team	
Carsten Skov	Project Team Leader, Landfill Expert (COWI Denmark)
NuneDarbinyan	Local coordinator (Director of NGO EcoGlobe, Armenia)
Kresten Berntsen	Solid Waste Management Expert (COWI Denmark)
NijoleVrubliauskiene	Institutional Expert (COWI Lithuania)
Ashot Baghdasayan	Economist, business planning expert COWI Denmark)
Larissa Lauritzen	Environmental and Social Due Diligence Expert (COWI Denmark)
GevorgMartirosyan	Graphic design specialist, Deputy Director, Transproject CJSC, Armenia
Armen Pogosyan	Transportation and logistics specialist, Mechanical Engineer, Transproject CJSC, Armenia
Albert Manukyan	Site Investigation Expert, Geologist, Transproject CJSC, Armenia
KarlenSafaryan	Head of Topographical Survey Group, Transproject CJSC, Armenia
Samvel Movsisyan	Civil Design Engineer, Transproject CJSC, Armenia

Appendix 3 List of persons met during the site visits

Name, position	Contact details
ArshavirKhachatryan Head of Department for Town-planning, Kotayk Regional Administration	Mob: +374 (093) 599 599
VardanKalantryan Specialist, Municipal Infrastructure Department Kotayk Regional Administration	Tel +374 223 2 13 39 Mob +374 91 76 35 46
KamoToumayan Head of Nature Protection Department Kotayk Regional Government	Mob: +374 (093) 21 55 77
LevonPetrosyan Head of Land Use Department Kotayk Regional Government	Mob: +374 (091) 42 53 24
EghisheAvetisyan Deputy Head of Land Use Department	Mob +374 93 91 65 82
Julieta Bubushyan Leader of NGO Civil Academy, Hrazdan	Tel: +374 (0223) 2 37 13 Mob 374 91 45 61 34
Abovyan town	
Vladimir Ivanyan, Head of City Administration Department for Housing Ser- vices and Real Estate	Tel: +374 0222 216 33 Mob + 374 93 51 90 10
SosMelikdjanyan Director of Abovyan Enterprise for Housing Services	Mob +374 91 41 73 09
ArtashesOganyan Deputy Director of Abovyan Enterprise for Housing Ser- vices	Mob +374 93 70 10 46
Byuregavan town	
Akop S. Balasyan Mayor	Tel +374 (222) 6 32 36 Mob: +374 (91) 21 28 48 balasyanh@mail.ru
Marine Baghdasaryan Secretary	Tel +374 (222) 6 32 36
Samvel Petrosyan Director of Byuregavan Municipal Enterprise for Landscap-	Mob +374 93 78 18 08

Name, position	Contact details
ing and Vegetation Management	Mob +374 91 78 18 08
Valery Balasanyan Director and one of the 3 owners of Byregavan City Cleaning OJSC	Mob +374 77 57 79 46
Lidiya Pogosyan, Chief Accountant	Tel +374 222 6 51 41
Nor Hachn town	
Gagik Matevosyan, Mayor	Mob +374 98 28 77 77
Benyamin Antonyan, Assistant of Mayor	Mob +374 94 01 14 03
Kristina Misaryan, Secretary of Mayor	Tel +374 224 4 25 50
Yourik Harutyunyan, Chairman of Household Association in Condominium 1	Tel +374 224 4-28 75 Mob +374 94 6128 16
Vladimir Mesropyan, Chairman of Household Association in Condominium 3	Tel +374 224 4 26 80
Sevan town	
Lyova A. Grigoryan, Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 91 02 26 27
Parkev Saakyan, Deputy Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 94 57 93 93
Kazar Kavtayan, Senior Police District Inspector	+374 9327 81 41
Larissa Manukyan Chief Engineer, HR Manager and OHS Manager of City Cleaning Enterprise	Tel +374 261 2 00 05, Mob +374 77 10 52 82
Lilit Kazaryan Computer specialist dealing mainly with the revenue management	Tel +374 261 2 47 07, Mob +374 77 50 17 01,
General public met during site visits	
Seriozha Arminakovich Markozyan (guard of the clay quarry located next to the Hrazdan dumpsite)	Tel: +374 0223 2 04 24 (priv.)

Name, position	Contact details
VazgenGrantovichDanielyan (farmer, owner of land adjacent to Yeghvard dumpsite)	Mob: +374 091 34 54 65
ArturOganesyan Mayor of Geghashen village	Mob +374 98 42 74 55
GairNikogosyan Mayor of Aramus town	Mob +374 91 42 09 08
Name, position	Contact details
ArshavirHachatryan Head of Department for Town-planning Kotayk Regional Administration	Mob: +374 (093) 599 599
VardanKalantryan Specialist, Municipal Infrastructure Department Kotayk Regional Administration	Tel +374 223 2 13 39 Mob +374 91 76 35 46
KamoToumayan Head of Nature Protection Department Kotayk Regional Government	Mob: +374 (093) 21 55 77
LevonPetrosyan Head of Land Use Department Kotayk Regional Government	Mob: +374 (091) 42 53 24
EghisheAvetisyan Deputy Head of Land Use Department	Mob +374 93 91 65 82
Julietta Bubushyan Leader of NGO Civil Academy, Hrazdan	Tel: +374 (0223) 2 37 13 Mob 374 91 45 61 34
Abovyan city	
Vladimir Ivanyan, Head of City Administration Department for Housing Services and Real Estate	Tel: +374 0222 216 33 Mob + 374 93 51 90 10
SosMelikdjanyan Director of Abovyan Enterprise for Housing Services	Mob +374 91 41 73 09
ArtashesOganyan Deputy Director of Abovyan Enterprise for Housing Services	Mob +374 93 70 10 46
Byuregavan city	

Name, position	Contact details
Akop S. Balasyan Mayor	Tel +374 (222) 6 32 36 Mob: +374 (91) 21 28 48 balasyanh@mail.ru
Marine Baghdasaryan Secretary	Tel +374 (222) 6 32 36
Samvel Petrosyan Director of Byuregavan Municipal Enterprise for Landscaping and Vegetation Management	Mob +374 93 78 18 08 Mob +374 91 78 18 08
Valery Balasanyan Director and one of the 3 owners of Byregavan City Cleaning OJSC	Mob +374 77 57 79 46
Lidiya Pogosyan, Chief Accountant	Tel +374 222 6 51 41
Nor Hatchn town	
Gagik Matevosyan, Mayor	Mob +374 98 28 77 77
Benyamin Antonyan, Assistant of Mayor	Mob +374 94 01 14 03
Kristina Misaryan, Secretary of Mayor	Tel +374 224 4 25 50
Yourik Harutyunyan, Chairman of Household Association in Condominium 1	Tel +374 224 4-28 75 Mob +374 94 6128 16
Vladimir Mesropyan, Chairman of Household Association in Condominium 3	Tel +374 224 4 26 80
Sevan city town	
Lyova A. Grigoryan, Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 91 02 26 27
Parkev Saakyan, Deputy Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 94 57 93 93
Kazar Kavtayan, Senior Police District Inspector	+374 9327 81 41
Larissa Manukyan Chief Engineer, HR Manager and OHS Manager of City Cleaning Enterprise	Tel +374 261 2 00 05, Mob +374 77 10 52 82
Lilit Kazaryan Computer specialist dealing mainly with the revenue man-	Tel +374 261 2 47 07, Mob +374 77 50 17 01,

Name, position	Contact details
agement	
General public met during site visits	
SeriozhaArminakovichMarkozyan guard of the clay quarry located next to the Hrazdan dumpsite	Tel: +374 0223 2 04 24 (priv.)
VazgenGrantovichDanielyan farmer, owner of 3 ha of land adjacent to Yeghvard dump- site in an abandoned quarry	Mob: +374 091 34 54 65
ArturOganesyan Mayor of Geghashen Village	Mob +374 98 42 74 55
GairNikogosyan Mayor of Aramus town	Mob +374 91 42 09 08
Name, position	Contact details
ArshavirHachatryan Head of Department for Town-planningKotayk Regional Government	Mob: +374 (093) 599 599
VardanKalantryan Specialist of Department for Municipal Infrastructure	Tel +374 223 2 13 39 Mob +374 91 76 35 46
KamoToumayan Head of Nature Protection Department Kotayk Regional Government	Mob: +374 (093) 21 55 77
LevonPetrosyan Head of Land Use Department Kotayk Regional Government	Mob: +374 (091) 42 53 24
EghisheAvetisyan Deputy Head of Land Use Department	Mob +374 93 91 65 82
Julietta Bubushyan Leader of NGO Civil Initiative, Hrazdan	Tel: +374 (0223) 2 37 13 Mob 374 91 45 61 34
Abovyan city	
Vladimir Ivanyan, Head of City Government Department for Housing Ser- vices and Real Estate	Tel: +374 0222 216 33 Mob + 374 93 51 90 10

Name, position	Contact details
SosMelikdjanyan Director of Abovyan Enterprise for Housing Services	Mob +374 91 41 73 09
ArtashesOganyan Deputy Director of Abovyan Enterprise for Housing Services	Mob +374 93 70 10 46
Byuregavan city	
Akop S. Balasyan Mayor	Tel +374 (222) 6 32 36 Mob: +374 (91) 21 28 48
Marine Baghdasaryan Secretary	Tel +374 (222) 6 32 36
Samvel Petrosyan Director of Municipal Enterprise for Landscaping and Planting	Mob +374 93 78 18 08 Mob +374 91 78 18 08
Valery Balasanyan Director and one of the 3 owners of Byregavan City Cleaning OJSC	Mob +374 77 57 79 46
Lidiya Pogosyan, Chief Accountant	Tel +374 222 6 51 41
Nor Hatchn town	
Gagik Matevosyan, Mayor	Mob +374 98 28 77 77
Beniamin Antonyan, Assistant of Mayor	Mob +374 94 01 14 03
Kristina Misaryan, Secretary of Mayor	Tel +374 224 4 25 50
Yourik Arutyunyan, Chairman of Household Association in Condominium 1	Tel +374 224 4-28 75 Mob +374 94 6128 16
Vladimir Mesropyan, Chairman of Household Association in Condominium 3	Tel +374 224 4 26 80
Sevan city town	
Lyova A. Grigoryan, Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 91 02 26 27
Parkev Saakyan, Deputy Director of City Cleaning Enterprise	Tel +374 261 2 30 57, Mob +374 94 57 93 93

Name, position	Contact details
KazarKavtayan, Senior Police District Inspector	+374 9327 81 41
Larissa Manukyan Chief Engineer, HR Manager and OHS Manager of City Cleaning Enterprise	Tel +374 261 2 00 05, Mob +374 77 10 52 82
LilitKazaryan Computer specialist dealing mainly with the revenue management	Tel +374 261 2 47 07, Mob +374 77 50 17 01,
General public met during site visits	
SeriozhaArminakovichMarkozyan guard of the clay quarry located next to the Hrazdan dumpsite	Tel: +374 0223 2 04 24 (priv.)
VazgenGrantovichDanielyan farmer, owner of 3 ha of land adjacent to Yeghvard dumpsite in an abandoned quarry	Mob: +374 091 34 54 65
ArturOganesyan Mayor of Geghashen Village	Mob +374 98 42 74 55
GairNikogosyan Mayor of Aramus town	Mob +374 91 42 09 08

Appendix 4 Record of stakeholder engagement activities for Kotay SWM Project

(to be regularly updated)

No	Date	Activity description	Documentation available
1	Aug 2008	Project formulation mission, site visits to Abovyan, Byureghavan, Charentsavan, Hrazdan, Yeghvard	Project identification report, Sep 2008
2	04 Aug 2010	Stakeholder meeting in Hrazdan and start-up of the Feasibility Study	List of project participants, photos
3	Aug-Oct 2010	Site visits and meetings with stakeholders in Abovyan, Aramus, Byureghavan, Charentsavan, Hrazdan, Geghashen, Nor-Hatch, Sevan, Tsakhkadzor, Yeghvard	List of persons met, questionnaires filled in, baseline report, photos
4	Mar 2011	ESIA Scoping Meeting, consultations with Department for Land Resources and Real Estate of Kotayk Regional Administration	Landfill site selection report

Appendix 5 List of participants of ESDD scoping meeting on 16.03.2011

“Kotayk solid waste management, ESDD” scoping meeting
with the RA Minister of Urban Development V.Vardanyan on 16.03.2011

	Organisation	Position	Name	Phone, e-mail	Signature / Presence
1	RA Ministry of Territorial Administration	Chief Specialist of Section for Local Development Projects of the Department for Local Development	H.Danielyan	51-13-18 094 32 69 05	Y
2	RA Ministry of Nature Protection	Head of Division for Hazardous Substances and Waste Policy	A.Aleksandryan	58-53-26 haz@mnp.am	Y
3	RA Ministry of Nature Protection, Water Resource Management Agency	Head of Water Resource Management Agency	A.Nersisyan	54-08-67 anersisyan@mnp.am	
4	RA Ministry of Nature Protection, Bio-Resource Management Agency	Head of Department for Flora Resources Management	H.Khazaryan	52-79-52, 58-07-11 055 422 432 a.ziroyan@mnp.am	Y
5	RA Ministry of Labor and Social Affairs	Head of Department for Disabled People and Elderly Issues	A.Kesoyan A.Gevorgyan	58-76-72, 52-17-61 055 14 00 08 artur.kesoyan@mss.am	Y
6	RA Ministry of Healthcare, State Inspectorate for Hygiene and Anti-Epidemiological Supervision	Head of Division for Environment and Communal Hygiene	Aida Petikyan	65-46-95 094 24 94 53	Y
7	RA Ministry of Economy	Head of Department for Industrial Policy	H.Mirzoyan	58-11-22+123 091 415 215 hmirzoyan@mineconomy.am	
8	RA State Committee for the Real Estate Cadastre	Head of Land Use Planning Division	F.Yegoryan	56-92-19 099 01 76 72	Y
9	RA President Committee for Lake Sevan Issues	Adviser to the RA President	V.Jiravyan	093 288 466	Y
10	RA Gegharqunik Regional Administration	Head of Urban Development Department	D.Hovhannisyan	091 35 16 42	Y
11	RA Kotayk Regional Administration	Head of Department for Town-planning	ArshavirKhachatryan	0223 2 13 39 qagh-shin.kotayq@mta.gov.am	Y
12	RA Kotayk Regional Administration	Head of Department for Land Use Planning and Real Estate	L.Petrosyan	091 42 53 24	Y
13	RA KotaykMarz, Hrazdan Municipality	Hrazdan Deputy Mayor	M.Mikaelyan	0223 2 39 64 093 77 70 82	Y
14	RA KotaykMarz, Abovyan Municipality	Head of Department for Housing Services and Real Estate	V.Ivanyan	2-16-33 093 51 90 10	Y
15	RA KotaykMarz,	Charentsavan “Barmak” Ltd	A.Tadevosyan	4-17-85	Y

	Organisation	Position	Name	Phone, e-mail	Signature / Presence
	Charentsavan Municipality	Director		094 108 300	
16	RA KotaykMarz, Yeghvard Municipality	Head of Department for Housing Fond and Office Maintenance	V.Vardanyan	0224 2-24-60 099 40 38 31 vardan48@yahoo.com	Y
17	RA KotaykMarz, Nor-Hachn Municipality	Manager of municipal services enter- prise	A.Dumanyan	094 99 14 66	Y
18	RA KotaykMarzByureghavan Municipality	-	-	-	-
19	RA KotaykMarzTsaghkadzor Municipality	Deputy Mayor	H.Mkrtchyan	093 90 10 20	Y
		Director of OJSC for Municipal Ser- vices	V.Balasyan	077 577 946	Y
20	RA GegharqunikMarz Sevan Municipality	-	-	-	-
21	"Armproject" OJSC	"Armproject" OJSC Director	Grigor.Azizyan	57-58-95, 091 41 51 13	Y
22	"Armproject" OJSC	"Armproject" OJSC Ecology Division Chief	J.Muradyan	091 37 35 06	Y
23	RA Ministry of Territorial Ad- ministration, State Committee for Water Management	Head of Department for Water Supply and Water Abstraction Systems	Arthur Ohanyan	54-72-83	Y
24	"Armenian Women for Health and Healthy Environment" NGO	Leader of Division for Hygiene and Environmental Risks	LilitSimonyan	52-36-04 office@awhhe.am	Y
25	"For Sustainable Human De- velopment" Association	President of Association	KarineDanielyan	52-23-27 091 36 58 86	Y
26	ECOGLOBE NGO	Director	NuneDarbinyan	22-12-95, 091 41 83 11 nd@ecoglobe.am nuneemail@yahoo.com	Y
27	"Civil Academy" NGO	President	J.Bubushyan	091 45 61 34	Y
28	"Civil Academy" NGO	NGO Member	N.Nersesyan	093 37 61 99	Y
29	"Sustainable Development" Hrazdan Branch NGO	NGO Member	S.Babakhanyan		Y
30	Lake Sevan Problems Committee	Adviser to the RA President	G.Hakobyan	091 34 16 22	Y
31	Ministry of Urban Development	Minister	V.Vardanyan	+(374 10) 58 90 80	Y
32	Ministry of Urban Development	Deputy Minister	A.Hakobyan	Tel: +374 10 56 51 31 av.hakobyan@mud.am	Y
33	Ministry of Urban Development	Deputy Minister	R.Alaverdyan		Y
34	Ministry of Urban Development	Chief Specialist of Department for Housing Policy and Municipal Infra- structure	Narine Avetyan	52 43 63	Y
35	Ministry of Urban Development	Secretary of Department for Housing Policy and Municipal Infrastructure	Mery	52 43 63	Y
36	Ministry of Urban Development	Head of Department for International Relations	ArmineAmbartsum- yan	52 09 43 fricd@mud.am	Y
37	Ministry of Urban Development	Head of Division for Public Relations	AniArmenakyan	56 03 81	Y

	Organisation	Position	Name	Phone, e-mail	Signature / Presence
				info@mud.am	
37	Ministry of Urban Development	Deputy Head of Department for Housing Policy and Municipal Infrastructure	ZoyaGhazaryan		Y
38	Ministry of Urban Development	Head of Legal Division	Garik Saroyan	56 21 36 gariksaroyan@yahoo.com	Y
39	Ministry of Urban Development	Head of Division for Spatial Planning	Sonya Matevosyan		Y
40	Ministry of Urban Development	Head of Staff	M.Baghdasaryan		Y
41	COWI A/S, Denmark	Project Manager	Carsten Skov	cask@cowi.dk	Y
42	COWI A/S, Denmark	Solid Waste Management Expert	Kresten Bernstn	krb@cowi.dk	Y
43	COWI A/S, Denmark	Environmental& Social Due Diligence Expert	Larissa Lauritzen	lla@cowi.dk	Y

Appendix 6 Record of the mass media publications related to the Project

No	Headline, the newspaper or website name and date of issue	Content in brief

Appendix 7 Form for comments and suggestions during the ESIA

<p>Ministry of Urban Development of the Republic of Armenia Government House 3, Republic Square, Yerevan 0010 Tel: +374 (10) 52 43 63, 56 03 81 Fax: +374 10 52 96 03 e-mail: info@mud.am</p>		
<p>Kotayk Solid Waste Management Project</p> <p>FORM for COMMENTS and SUGGESTIONS</p>		
<p>Contact details of person submitting the comments and suggestions We would like you to provide your name, address and e-mail, if possible. If you wish to remain anonymous, this is not a problem. Please just write ANONYMOUS in the box below. Your comments will still be considered by the Ministry of Urban Development. You can write on the reverse side or on additional pages. You do not need to fill in the gray section of this form. It is for our registration of your comment and response to it. After you have filled in this form, it can be submitted by letter, by fax or by e-mail to the Ministry of Urban Development (see the contact details above).</p>		
Name		
Address		
Telephone	E-mail address	
<p>Comments and suggestions concerning the Kotayk Solid Waste Management Project</p>		
<p>Would you like to receive information on the Project developments? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, how would you like to receive it: <input type="checkbox"/> TV <input type="checkbox"/> letter <input type="checkbox"/> poster <input type="checkbox"/> e-mail <input type="checkbox"/> website Which contact language you prefer: <input type="checkbox"/> Armenian <input type="checkbox"/> Russian <input type="checkbox"/> English</p>		
<p><i>STATUS OF COMMENT</i></p>		
<p><i>How was the comment received:</i> <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> At reading room <input type="checkbox"/> By mail <input type="checkbox"/> By email <input type="checkbox"/> Other (please describe).....</p>		
<p><i>Comment registration date:</i> :</p>	<p><i>Comment number:</i></p>	<p><i>Registered by:</i></p>
<p><i>Response required Yes/No</i></p>	<p><i>Person responsible for preparing the response:</i></p>	
<p><i>Response sent (date):</i></p>	<p><i>Response registered (date):</i></p>	

Appendix 8 Public grievance form

<p>Ministry of Urban Development of the Republic of Armenia Government House 3, Republic Square, Yerevan 0010 Tel: +374 (10) 52 43 63, 56 03 81 Fax: +374 10 52 96 03 e-mail: info@mud.am</p>	
<p>Kotayk Solid Waste Management Project</p> <p>PUBLIC GRIEVANCE FORM</p>	
<p>Contact details of person submitting the comments and suggestions</p> <p>We would like you to provide your name, address and e-mail, if possible. If you wish to remain anonymous, this is not a problem. Please just write ANONYMOUS in the box below. Your grievance will still be considered by the Ministry of Urban Development. You can write on the reverse side or on additional pages. You do not need to fill in the gray section of this form. It is for our registration of your grievance and response to it. After you have filled in this form, it can be submitted by letter, by fax or by e-mail to the Ministry of Urban Development (see the contact details above).</p>	
Name	
Address	
Telephone	E-mail address
<p>Grievance concerning implementation of the Kotayk Solid Waste Management Project</p>	
What happened?	
How this became a problem for you? How this disturbs you?	
Where did it happen?	
When did it happen? Once (date) _____ Several times (how many?) _____ On-going problem _____	
What would you like to see happen to improve the situation?	
Which contact language you prefer: <input type="checkbox"/> Armenian <input type="checkbox"/> Russian <input type="checkbox"/> English	
<i>STATUS OF GRIEVANCE</i>	
How was the grievance received: <input type="checkbox"/> In person <input type="checkbox"/> By phone <input type="checkbox"/> By mail <input type="checkbox"/> By email <input type="checkbox"/> Other (please describe).....	
Grievance registration date:	Grievance number:
	Registered by:
Response required Yes/No	Person responsible for preparing the response:
Response sent (date):	Response registered (date):

Appendix 9 Grievance form for employees and non-employee workers

FORMAL GRIEVANCE

<p>A grievance is defined as an act, omission or occurrence which an employee feels constitutes an injustice and can be established on factual information. It may relate to any condition arising out of the relationship between an employer and an employee, including but not limited to, compensation, working hours, working conditions, and membership in an organisation of employees or the interpretation of any law, regulation or disagreement. It does not include position allocation, involuntary transfers, dismissals, demotions, or suspensions.</p>				
<p>Name of Grievant: Job Title: Date of Hire:</p>		<p>Work Phone: Home Phone: Mobile Phone: e-mail:</p>		
<p>Home Mailing Address:</p>		<p>Work Mailing Address:</p>		
<p>Date, time and place of event leading to grievance: _____</p>		<p>Date you became aware of the event _____</p>		
<p>Detailed description of grievance including names of other persons involved, if any:</p>				
<p>Applicable sections of Labour Code, laws, regulations or the Collective Agreement:</p>				
<p>Date of contacting the workers' organisation (if relevant)</p>				
<p>Proposed solution to grievance:</p>				
<p>Please file a copy of this form with your immediate supervisor and retain a copy for filing at possible next step or steps. If you do not receive a response within 10 working days or disagree with the action taken, you may file a copy of the form with the next level supervisor.</p>				
Step	Name of supervisor receiving the grievance	Date	Signature of the Grievant	Signature of the supervisor receiving the grievance
1				
2				
3				
4				

Appendix 10 EBRD labour requirements for construction contractors

Prohibition of Forced Labour

'The Contractor shall ensure that there shall be no use of forced or compulsory labour, including bonded or involuntary prison labour, in any form. Forced or compulsory labour consists of all work or service not voluntarily performed that is extracted from an individual under threat of force or penalty. Workers shall not be required to lodge deposits or their identity papers with their employers.'

Prohibition of Child Labour

'The Contractor shall ensure that you people are not employed below the appropriate national age for employment in Georgia, namely 16. Young people who are employed between the ages of 16 and 18 shall not be employed on hazardous work and a risk assessment shall be carried out in respect of any work carried out by such employees.'

Non-discrimination and equal treatment

'The Contractor shall ensure non-discrimination and equality of opportunity and treatment in respect of employment and occupation, training and working conditions, in compliance with national law. The Contractor shall ensure equal remuneration for men and women for work of equal value.'

Freedom of association

'All workers shall have the right to form and join trade unions and to bargain collectively, as provided for under Georgian national law (Trade Union Act, 1997). The Contractor shall ensure that workers representatives shall not be discriminated against and shall have access to all workplaces necessary to enable them to carry out their representation functions.'

Record-keeping

'The Contractor shall keep a complete register of all staff and workers, giving their name, age, sex, the class of work the person is employed to carry out, hours worked, wages payments made and any deductions made. This register shall be updated monthly and made available to the Bank's appointed representative during working hours.'

Wages

'The Contractor shall pay rates of wages and benefits that shall meet at least statutory or agreed industry minimum rates. Deductions from wages for disciplinary measures shall not be permitted nor shall any de-

ductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. Deductions must never lead to an employee receiving less than the applicable minimum wage.'

'All workers shall be provided with clearly understandable verbal and written information about the conditions in respect of wages before they enter employment and of the particulars of their wages for the pay period concerned each time that they are paid. Wages shall be paid in legal tender in full, on time and directly to the workers concerned. The Contractor shall maintain records of all payments and deductions made.'

Hours of Work

'Hours of work shall comply with applicable laws, collective agreements, and industry standards. Overtime shall be voluntary wherever possible, shall not be demanded on a regular basis and shall always be compensated at a premium rate.'

Health and Safety

'The Contractor shall provide the Bank's appointed representative with a written Health and Safety Policy and a project-specific Health and Safety Plan before the commencement of work.'

'The Contractor shall ensure that a safe and healthy working environment is provided and that best occupational health and safety practice is promoted. The Contractor shall provide regular information and training to all staff, labourers and persons entitled to be on site regarding the potential hazards to health and safety, and on the measures in place to prevent accidents, injuries and ill health.'

Social Security

'The Contractor shall ensure that that obligations to staff and labour under labour or social security laws and regulations arising from the employment relationship shall be respected, and that such obligations shall not be avoided through the use of labour-only contracting arrangements.'

Grievance mechanism

'The Contractor shall ensure that a grievance mechanism is available to all workers to use without fear of intimidation or retaliation.'

Reports

'The Contractor shall record occupational accidents and occupational diseases, and shall provide information to workers and their representatives concerning the recording system. The Contractor shall notify the

competent authorities of occupational accidents and occupational diseases, and provide appropriate information to workers and their representatives concerning the notified cases.'

'The Contractor shall provide regular reports – frequency to be agreed with the Bank – on its management and monitoring of working conditions of direct and indirect employees on the Works Site.'