

# **DRAFT ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)**

## **SISIAN-KAJARAN (NORTH-SOUTH CORRIDOR) ROAD PROJECT, ARMENIA**



*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>]*

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# DRAFT ENVIRONMENTAL AND SOCIAL ACTION PLAN (ESAP)

## SISIAN-KAJARAN (NORTH-SOUTH CORRIDOR) ROAD PROJECT, ARMENIA

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### Prepared for:

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

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## DETAILS OF DOCUMENT PREPARATION AND ISSUE:

Version	Issue Date	Description
1	05.06.2023	Draft for review by the Lenders and the Client
2	22.06.2023	Pre-final Draft for review by the Lenders and the Client, translation into Armenian and public disclosure
3	27.06.2023	Final Draft for approval by the Lenders and the Client, translation into Armenian and public 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
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standard (of the EIB)
EU	European Union
GIP	good international practice
IFC	International Finance Corporation
MTAI	Ministry of Territorial Administration and Infrastructure of Armenia
MoE	Ministry of Environment of Armenia
NGO	Non-governmental organisation
NSRC	North-South Road Corridor
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
PR	Performance Requirement (of the EBRD)
RA	Republic of Armenia
RD	Road Department Fund
SDA or DA	(Spoil) disposal area
SEP	Stakeholder Engagement Plan
SESMP	Specific Environmental and Social Management Plan
SR	Safeguard Requirement (of ADB)

## ENVIRONMENTAL AND SOCIAL ACTION PLAN

The Road Department Fund (the RD) under the Ministry of Territorial Administration and Infrastructure of Armenia (MTAI or the Promoter) is the Implementing Agency for the construction of the 60km Sisian-Kajaran road section of Armenia's strategic North-South Road Corridor (NRSC) (the Project). Financing for the Project is being sought from the international financial institutions including the European Bank for Reconstruction and Development (EBRD), European Investment Bank (EIB) and Asian Development Bank (ADB) (together "the Lenders"). An investment grant is also provided by the European Union Neighbourhood Investment Platform.

The Environmental and Social Action Plan (ESAP) presented below has been prepared **for the Project** in line with the Lenders' requirements. The ESAP is based on the compliance review of the Environmental and Social Impact Assessment (ESIA) that has been completed for the Project (2023) against the Project legal framework comprising:

- EBRD's E&S Policy (2019) and associated Performance Requirements (PRs).
- EIB's E&S Policy (2022) operationalised via Environmental and Social Standards (ESSs).
- ADB's policies including the Safeguard Policy Statement (2009) and the integrated Safeguard Requirements (SRs).

The Lenders will decide on financing for the Project following the conclusion of the 120-day disclosure period.

The ESAP is an overarching document describing the measures needed to bring the Project implementation in compliance with the requirements of the Lenders and the national legislation of Armenia.

The RD will be held responsible for the implementation of the Project activities and ESAP, on behalf of the Promoter and the RA.

### Environmental and Social Action Plan: Sisian – Kajaran Road, Armenia

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
1	<b>Assessment and Management of Environmental and Social (E&amp;S) Risks and Impacts (EBRD PR1, EIB ESS 1, ADB SR 1)</b>					
1.1	<p>Develop and implement the Project's <b>integrated Environmental, Health and Safety, and Social Management System (ESMS) (the so-called 'Project ESMS')</b>, including:</p> <ul style="list-style-type: none"> <li>• Environmental, Health and Safety, and Social Policy;</li> <li>• Organizational structure details and chart;</li> <li>• Contractor and Supplier Management Procedure (to manage their E&amp;S, including Health &amp; Safety, performance);</li> <li>• (Framework) Environmental and Social Management Plan (ESMP);</li> <li>• A framework for monitoring and reporting on E&amp;S performance (including the E&amp;S Monitoring Plan in the ESMP);</li> <li>• Procedures for addressing non-compliances, complaints and incidents;</li> <li>• Change Management Procedure to ensure any changes to the original Project design, capacity, location or process technology are subject to an environmental and social assessments with any new impacts are appropriately addressed and mitigated in line with Lender E&amp;S requirements. Any material changes will be required to obtain a non-objection from Lenders;</li> <li>• Stakeholder Engagement Plan and grievance mechanism (see Action 8.1)</li> </ul> <p>Integrate Project ESMS and ESMPs across contractors by contractually obliging the Contractor to implement the Project's ESMS. Clear roles and responsibilities to be identified for implementing the ESMS and ESMP.</p>	<p>All E&amp;S risks and benefits</p> <p>Systematisation and optimisation of E&amp;S management</p>	<p>EBRD PR 1</p> <p>EIB ESS 1</p> <p>ADB SR 1</p> <p>Good international practice.</p>	<p>RD with Consultant and Supervision Engineer</p> <p>PIU and</p>	<p>Development of the ESMS - prior to the mobilisation of the Construction Contractor</p> <p>Implementation - during construction – via the review of compliance of contractors, then implementation during the Project operations</p>	<p>Due documentation developed and adopted.</p> <p>Change management procedure is adopted, after being approved by Lenders. Material changes reported to Lenders for non-objection</p> <p>Implementation, monitoring and revision / updating of the ESMS, as required.</p> <p>Ongoing reporting.</p>

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Relevant requirements during construction should be made the responsibility of contractors, monitored by the PIU Consultant and Supervision Engineer, and during operation - the responsibility of the RD.</p> <p><i>[Note: system(s) should generally meet objectives of ISO14001 and ISO 45001, but need not be certified].</i></p>					
1.2	<p>Implement the Project's ESMS, including the policies, procedures, and mitigation measures and requirements included in the Project's ESMP.</p> <p>Prepare and implement the <b>construction phase specific ESMPs (SESMPs)</b> in line with Lender requirements including, but not limited to:</p> <ul style="list-style-type: none"> <li>• Air Quality Management Plan;</li> <li>• Topsoil Management Plan;</li> <li>• Waste Management Plan (including a Spoil Disposal sub-plan);</li> <li>• Erosion Control Plan;</li> <li>• Slope Stabilisation Plan (to be informed by the required geo-hazards risk assessment, see Action 4.3)</li> <li>• Wastewater and Stormwater Management Plan;</li> <li>• Noise and Vibration Management Plan (including a Blasting Management Plan);</li> <li>• Spill Management Plan;</li> <li>• Hazardous Materials Management Plan;</li> <li>• Tunnel Water Management Plan (including groundwater diversion from tunnels);</li> <li>• Traffic Management Plan (incl. a Road Audit &amp; Condition Survey, Temporary Road sub-plans and Access and Local Connectivity Plan);</li> <li>• Community and Occupational Health and Safety Plan;</li> <li>• Labour and Working Conditions</li> </ul>	<p>Minimisation of the E&amp;S, including health and safety, risks and impacts of the Project during construction</p>	<p>EBRD PRs 1-6 and 8</p> <p>EIB ESSs 1, 3-10</p> <p>ADB SR 1 and Safeguard Policy Statement</p> <p>Good international practice.</p> <p>National legislation</p>	<p>Contractor to prepare the SESMPs</p> <p>Contractor (and any of their sub-contractors) to implement</p> <p>RD – non-objection, Supervision Engineer to approve the SESMPs</p> <p>PIU Consultant to review Supervision Engineer and RD to monitor the delivery of the SESMPs</p>	<p>Develop prior to construction on site</p> <p>Contractor's ESMS and SESMPs submitted to the RD and Engineer a minimum of 30 days before start of the construction works and approved by Supervision Engineer and agreed with the RD before construction commences.</p> <p>For the Demobilisation Plan: adoption within the first 6 months of the construction. Implementation – during construction</p>	<p>Contract with the Contractor is approved by Lenders and is in place with the Project's ESMP annexed.</p> <p>Contractor's ESMS and SESMPs approved by the RD and Engineer and then implemented.</p> <p>Monitoring reports by the Supervision Engineer and Contractor.</p> <p>Monitoring reported in the E&amp;S Monitoring Reports to the Lenders.</p>

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>Management Plan (with a Worker Accommodation Plan as a sub-plan, and a grievance mechanism for workers);</p> <ul style="list-style-type: none"> <li>• Worker Code of Conduct;</li> <li>• Cultural Heritage Management Plan;</li> <li>• Chance Finds Procedure;</li> <li>• Emergency Preparedness and Response Plan;</li> <li>• Invasive Species Management Plan (as indicated in the Biodiversity Action Plan);</li> <li>• Recultivation /Land Restoration Plan (for temporarily used sites);</li> <li>• Construction Camp Management Plan (based on the Accommodation Option Risk Assessment);</li> <li>• Concrete Batching Management Plan;</li> <li>• Asphalt Plant Management Plan;</li> <li>• Procurement Plan;</li> <li>• Utilities Protection and Relocation Plan;</li> <li>• Demobilisation Plan;</li> <li>• Recruitment Policy for the Project;</li> <li>• Recruitment Plan.</li> </ul> <p>Revise the above plans based on the additional E&amp;S assessments, studies, monitoring findings etc. the revised versions should also be approved by the PIU and supervision engineer and receive non-objection from the RD.</p>					
1.3	<p>Ensure that subcontractors meet the same applicable Lenders' standards and follow the requirements of the ESMS and construction SESMPs developed by the Contractor, by:</p> <ul style="list-style-type: none"> <li>i) including specific clauses in the Contractor's Contract, and</li> <li>ii) including specific clauses, in all contracts with subcontractors.</li> </ul>	<p>Minimisation of the E&amp;S, including health and safety, risks and impacts of the Project during construction</p>	<p>EBRD PR 1 EIB ESS 1 ADB SR 1</p>	<p>i) RD to verify contractual arrangements are in place ii) Contractor to monitor the implementation of these requirements by the subcontractors.</p>	<p>i) Before contract signature ii) During construction – prior to signing specific sub-contracts</p>	<p>i) Specific clauses included in the Contractor's contracts with the RD. ii) Specific clauses included in the subcontracts with Contractor and monitoring reports from contractors. Contractor's confirmation that their sub-contractors have ESMS in place and sufficient capacity to implement the ESMS, and</p>

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
						the requirements of the ESMP in line with the provisions of the Contractor's main contract
1.4	<p>i) RD to prepare <b>an organizational structure framework</b> for E&amp;S (inclusive of Health and Safety) including roles and responsibilities within the RD, communication framework (amongst RD, Project Implementation Unit of the RD and Contractors) and a description of the decision-making process.</p> <p>ii) RD to ensure that the RD has sufficient staff for project implementation and with adequate competences on national and international E&amp;S standards (a minimum of three specialists – environmental, incl H&amp;S, social and stakeholder engagement (see also Action 8.2)).</p> <p>iii) RD to ensure that Contractor has sufficient staff for project implementation and with adequate competences on national and international E&amp;S standards with dedicated roles defined for environmental, social safeguards and resettlement, biodiversity (see also Action 6.2.), cultural heritage, and occupational and community health and safety (depending on the number of workers).</p> <p>iv) Ensure that Supervision Engineer has sufficient staff for project implementation and with adequate competences on E&amp;S standards (including a mixed representation of international environmental and occupational health and safety experts, and national experts on environment, social and resettlement, biodiversity, cultural heritage, and occupational and community health and safety).</p>	<p>Capacity to implement the project in accordance with applicable standards</p> <p>Clear and efficient decision-making processes</p>	<p>EBRD PR 1</p> <p>EIB ESS 1</p> <p>ADB SR 1</p>	RD	<p>I and ii-- prior to tendering the works</p> <p>iii and iv – upon signing the contracts</p>	<p>i) Organisational framework adopted and implemented.</p> <p>ii) Staff of RD adequately covering necessary competencies and capable to manage Contractors in place.</p> <p>iii) Contractor team with relevant experience in place.</p> <p>iv) Engineer team with relevant experience in place.</p>

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1.5	Carry out a <b>site selection, E&amp;S surveys and assessment, and design works</b> for the spoil disposal areas (SDAs), access roads to them, construction camps, lay-down sites, power line, water supply and other Project components that are not currently sited, in line with the recommendations defined in the ESIA/ESMP. The locations of the facilities to be approved by the Sisian and Kajaran Communities' authorities, Ministry of Environment (MoE), Supervision Engineer and Lenders, following the consultations with the local affected stakeholders. The findings of Action 1.6 (geohazard assessment) should be taken into account during the design adjustments and siting the above-mentioned Project components, if relevant.	Management of E&S impacts related to SDAs and other Project components that locations of which are currently unspecified	EBRD PR 1 EIB ESS 1 ADB SR 1 National regulations Good international practice	Contractor – development / implementation RD and Supervision Engineer – review and approval	Prior to the start of construction on specific sites	Supplementary E&S documentation submitted to and approved by the RD and Lenders. Where applicable, Environmental Impact Conclusions (or permits) obtained from the MoE. Non objection from Lenders on locations of all facilities.
1.6	Complete the <b>additional geological investigations</b> and geohazard identification and assessment. Update the Project design and the Slope Stabilisation Plan based on the results of this study, if needed.	Raised level of safety and reliability of road traffic		Independent Technical consultant hired by the EBRD  Resources provided by RD and Lenders to implement findings	Prior to construction	Geotechnical Report and Detailed Design Documents non-objection by the Lenders, RD and Promoter  Change management process completed if material changes are needed, with non-objection from Lenders.
1.7	Establish and keep up-to-date a <b>register of all the E&amp;S, including health and safety, permits and agreements</b> relevant to the Project activities as recommended in the framework ESMP, encompassing but not limited to: top-soil removal permits, EIA	Compliance with national regulatory and permitting framework.	National regulations	RD to contractually oblige the Contractor to keep the register  Contractor to keep the register	Prepare before start of construction and maintain throughout the Project lifecycle <i>(the RD to take over the maintenance of the register for operations)</i>	The permit register is in place and continuously updated.

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	permits <sup>1</sup> , construction permits, water abstraction permits, forest clearing (if necessary), quarry cultivation (if necessary), blasting operations, wastewater discharge limits and authorizations, waste disposal agreements, air emission limits and authorizations, occupational health and safety licenses, approvals related to relocation of cultural heritage items, approvals related relocation of crossed infrastructure.			PIU Consultant and Engineer to monitor that the register is well maintained and permits are in place		
1.8	Timely obtain all required permits, authorizations and approvals from the relevant authorities and maintain compliance with their prescriptions and approval conditions.	Compliance with national regulatory and permitting framework.	National regulations	Contractor to obtain permits	As required by the national regulations	Relevant permits and approvals obtained.
1.9	Develop and implement a <b>construction-phase Monitoring Programme</b> to ensure that applicable national and international standards as identified in the ESMP and SESMPs are being met and to demonstrate Contractor E&S performance.	Verification of the effectiveness of the mitigation measures developed for the construction phase.	EBRD PR 1 EIB ESS 1 ADB SR 1 National regulations	Contractor The RD – non-objection, PIU Consultant to review and Supervision Engineer to approve	Developed before start of construction Implementation – throughout the project lifecycle (per monitoring timeframes / frequencies provided in the plans)	Monitoring Programme in place and implemented
1.10	i) Provide semi-annual E&S reports following signing of the Loan agreement and until the construction starts on the ESAP progress and the Project's E&S performance, including implementation of the ESMS, any non-compliances, respective corrective measures, etc.  ii) <u>During construction:</u> Provide quarterly E&S Reports to the Lenders on the ESAP progress and the Project's E&S	Timely monitoring and reporting on the Project's E&S commitments	Lenders' requirements	RD with support of the PIU Consultant and Supervision Engineer	i) Following the signing of the Loan Agreement and until the start of physical positioning on the site ii) During construction iii) To ADB: semi-annually after the construction phase is over and before the	Semi-annual, quarterly and annual E&S monitoring reports submitted to the Lenders.

<sup>1</sup> In addition to the EIA Permit for the Project development that will be obtained by the RD in autumn 2023.

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	<p>performance (during construction or until otherwise instructed by Lenders).</p> <p>iii) <u>During operations</u>: Provide semi-annual E&amp;S Reports to ADB until the Project Completion Report is issued, and provide annual E&amp;S Reports to EBRD and EIB on the ESAP progress and the Project's E&amp;S performance until the loan is repaid.</p>				<p>Project Completion Report is issued;</p> <p>To EBRD and EIB: annually after the construction phase is over and until the loan is re-paid</p>	
1.11	<p>i. Commission an independent / External Social Consultant to monitor the Project's social performance against the Lenders' requirements (this consultant to have labour audit expertise in order to implement Action 2.4.).</p> <p>ii. Commission an independent / External Environmental Consultant to monitor the Project's environmental performance against the Lenders' requirements.</p> <p><i>NB: the Terms of Reference for these consultants are to be agreed with the Lenders before hiring</i></p>	<p>Achieved compliance with the Project's E&amp;S commitments</p>	<p>Lenders' requirements for Category A projects</p>	<p>RD / MTAI</p>	<p>Independent E&amp;S Consultants contracted after signing the Loan Agreement to monitor respective activities during the pre-construction and construction phases, and first two years of operations (unless otherwise is requested by the Lenders)</p>	<p>Competent independent consultants in place. E&amp;S Monitoring reports submitted to the Lenders and RD. Corrective actions identified in the monitoring reports are implemented by the Contractor or RD, as relevant.</p>
1.12	<p>Update and implement <b>operation-phase ESMPs</b>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Noise and Vibration Management Plan;</li> <li>• Air Quality Management Plan;</li> <li>• Waste Management Plan;</li> <li>• Emergency Preparedness and Response Plan;</li> <li>• Community and Occupational Health and Safety Plan;</li> <li>• Spill Response Plan</li> <li>• Worker Code of Conduct.</li> <li>• Biodiversity Action Plan</li> <li>• Stakeholder Engagement Plan</li> <li>• For larger maintenance works also: Operation Phase Recruitment Plan, and Labour and Working Conditions</li> </ul>	<p>All E&amp;S risks and benefits</p> <p>Systematisation and optimisation of E&amp;S management</p> <p>Verify the effectiveness of the mitigation measures</p>	<p>EBRD PR 1</p> <p>EIB ESS 1</p> <p>ADB SR 1</p> <p>National regulations</p>	<p>RD with support of the PIU Consultant</p> <p>Maintenance Contractor to develop the labour, recruitment and procurement related plans</p>	<p>SESMPs developed prior to operations. The ESMPs reviewed annually (or more often if required).</p>	<p>Plans in place and implemented. Monitoring documented. Results reported in the E&amp;S monitoring reports to the Lenders (against the operations ESAP commitments).</p>

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Management Plan. Develop monitoring actions as part of the above plans and implement them.					
1.13	Develop and Implement Operations Phase E&S Monitoring Programme	Verification of the effectiveness of the mitigation measures developed for the operations phase.	EBRD PR 1 EIB ESS 1 ADB SR 1 National regulations	RD with the PIU Consultant	Develop – prior to operations, then implement	Monitoring Programme in place and implemented Results including in the operations-phase E&S reporting to Lenders
<b>2</b>	<b>Labour and Working Conditions (EBRD PR 2, EIB ESS 8, ADB SP 1 and Safeguard Policy Statement)</b>					
2.1.	Develop and implement a <b>Human Resources (HR) Policy</b> , confirming commitment to comply with the Lenders' policies on labour and working conditions. In the HR Policy, include clear commitments related to: <ul style="list-style-type: none"> <li>• non-discrimination and equal opportunities,</li> <li>• temporary worker accommodation,</li> <li>• principles to prevent and respond to Gender-Based Violence and Harassment (GBVH),</li> <li>• minimum wage, working hours, paid overtime,</li> <li>• prohibition of forced and child labour,</li> <li>• workers' grievances,</li> <li>• Workers Code of Conduct</li> <li>• access to information about workers' rights</li> <li>• freedom of association and collective bargaining,</li> </ul>	Improved human resources management, reduced risk of poor employee / management relations	EBRD PR2, EBRD Guidance Note "Human Resources Policies and Employee Documentation" (2017)  SA 8000:2014, ISO 26 000; Good international practice <sup>2</sup>  EIB ESS 8  International Labour Organization's Conventions  ADB SP 1 and Safeguard Policy Statement	RD to prepare and implement the HR Policy	Before construction starts	HR Policy and supporting procedures adopted and submitted to Lenders  Monitoring results of HR Policy implementation reported in the E&S Monitoring Reports to the Lenders.  RD's workers' master grievance log maintained and submitted to Lenders semi-annually

<sup>2</sup> For example, EBRD, IFC and CDC Guidance on Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector (2020).  
<https://www.ebrd.com/news/2020/new-guidance-for-private-sector-on-addressing-risks-of-genderbased-violence-and-harassment.html>

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	<ul style="list-style-type: none"> <li>informing the workers and non-worker employees about the provisions of the Project's HR Policy.</li> </ul> <p>HR Policy and supporting procedures communicated to workers and non-worker employees.</p> <p>Workers' grievance mechanism should be accessible to the all workers including non-employee and supply chain workers.</p>		<p>National labour and working conditions regulations</p> <p>EBRD / IFC<sup>3</sup> Guidance Note: Worker's Accommodation: Processes and Standards (2009)</p>			
2.2	<p>RD to require its contractors and sub-contractors to comply with Lenders' labour requirements by cascading all key labour requirements under the HR Policy across the RD's all contracting chains</p>	As above		RD	Before the agreement is signed with Contractor / Sub-contractors / consultants	Evidence of the HR Policy adopted and implemented by Contractors/sub-contractors / consultants submitted to Lenders
2.3	<p>RD to ensure that the Contractor develops and implements the <b>construction-phase Labour and Working Conditions Management Plan (LWCMP), with a Worker Accommodation Plan and Local Recruitment Plan as a sub-plan.</b></p> <p>In line with the <b>Worker Accommodation Plan</b>, for any temporary accommodation facilities (construction camps or private dwellings) provided by a Contractor or a subcontractor, ensure accommodation meet requirements of IFC/EBRD Worker Accommodation Guidance Note.</p> <p>Any material changes to the LWCMP need to be reapproved by RD and Lenders.</p>	<p>Improved management of labour and working conditions.</p> <p>All grievances are considered and addressed properly</p> <p>Safe working and living conditions of workers</p>		<p>Contractor to develop and submit the LWCMP to Supervision Engineer for approval, to PIU Consultant for review, and to the RD – for non-objection</p> <p>RD to submit the LWCMP to Lenders for sign off</p>	LWCMP finalized and signed off by Lenders before the No Objection Notice issued to Contractor	<p>LWCMP submitted and accepted by Lenders</p> <p>Monitoring over the LWCMP implementation is reported in the E&amp;S Monitoring Reports to the Lenders.</p>

<sup>3</sup> International Finance Corporation.

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				Supervision Engineer to monitor monthly inspections via		
2.4	RD to implement at least two independent labour audits during the construction phase of the project to confirm the project is aligned with Lenders' labour requirements.  RD to submit ToR and CVs of the proposed auditor to carry out a labour audit to Lenders for approval.	Improved HR management and safer working conditions		RD to engage an external labour auditor and commission two labour audits of the project (see Action 1.11).	The first audit carried out when the project workforce is mobilized, and the second one conducted during the peak of the construction phase.	Labour audit reports accepted by Lenders  ToR and CVs for the labour auditors submitted and approved by Lenders.
<b>3</b>	<b>Resource Efficiency and Pollution Prevention and Control (EBRD PR 3, EIB ESS 3, ADB SR 1)</b>					
3.1	Implement all SESMPs related to air, noise, vibration, soil, waste, water, hazardous materials, biodiversity and so forth as listed in ESAP Actions NN. 1.2., 1.4, 1.6 specifically and in other actions across the ESAP.		EBRD PR 3 EIB ESS 3 ADB SR 1 National regulations EU Directives			
3.2	Implement the following options for all properties still above WHO 2021/ Armenian standards for noise during the operations phase: <ul style="list-style-type: none"> <li>Additional mitigation measures (such as soundproofing of houses and noise barriers), if these are not effective, then: <ul style="list-style-type: none"> <li>Physical relocation of the households from the affected properties, or</li> <li>Signing waiver agreements with property owners.</li> </ul> </li> </ul>	Avoidance / reduction of noise impacts on human receptors	EBRD PR 4 EIB ESS 9 ADB SR 1 National regulations	RD to provide resources to implement the mitigation measures agreed with project affected persons.	Based on noise monitoring results	Analysis of noise monitoring results; evidence of additional mitigation effort; evidence of consultations with the affected households and agreed solutions  Agreed solutions implemented
3.3	Update the detailed design to include noise attenuation measures, such as noise barriers, soundproof windows, vegetation screen and so on at relevant locations as per the ESIA modelling results			RD and Contractor	During the update of the detailed design	Noise barriers or other noise attenuation measures, as relevant to the local relief and receptors, are integrated in the detailed design
<b>4</b>	<b>Health, Safety and Security (EBRD PR 4, EIB ESS 9, ADB SR 1)</b>					

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
4.1	<p><b>Road Safety Audit – Pre-construction</b></p> <p>Appoint a competent independent Road Safety Auditor to undertake a road safety audit of the detailed design (Stage 2) in line with the EU Directive 2008/96/EC.</p> <p>The RD will request the design team to review the Road Safety Audit report and incorporate all technically and economically feasible recommendations into the final design.</p> <p>The client will share the Road Safety Audit report with the Lenders, confirm the recommendations that have been accepted and verify that minimum 3 Stars according to iRAP protocol will be achieved for all categories or road users. Where recommendations have not been accepted, the RD will confirm to the Lenders the reason why, and what other method will be adopted to manage/ mitigate the road safety concerns.</p>	Management of safety risks	<p>EU Directive 2008/96/EC &amp; EU Directive 2019/1936 on Road Infrastructure Safety Management</p> <p>Directive 2004/54/EC Minimum Safety Requirements for Tunnels in the Trans European Network</p> <p>EBRD PR 4</p> <p>EIB ESS 9</p> <p>ADB SR 1</p> <p>National regulations</p>	<p>RD to appoint independent Road Safety Auditor</p> <p>Road Safety Auditor to complete the safety audit</p> <p>RD to review Road Safety Audit findings and allocate resources to address findings/ recommendations.</p>	During the finalisation of the detailed design	<p>Road Safety Audit (Stage 2) report shared with the Lenders</p> <p>Road Safety Audit recommendations implemented.</p>
4.2	<p><b>Road Safety Audit – Pre-operations</b></p> <p>On completion of the construction of the road, and prior to opening, appoint an independent Road Safety Auditor, to conduct a Pre-Opening Road Safety Audit (Stage 3) in line with EU Directive 2008/96/EC. The Road Safety Auditor will confirm all the road safety recommendations accepted during the stage 2 audit, or / and other methods agreed to manage / mitigate road safety concerns, have been fully implemented and no additional road safety concerns have been identified.</p>			<p>RD to appoint independent Road Safety Auditor</p> <p>Road Safety Auditor to complete the safety audit</p>	5-6 months before the road commissioning	<p>Road Safety Audit (Stage 3) report shared with the Lenders</p> <p>RSA recommendations implemented.</p>
<b>5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement (EBRD PR 5, EIB ESS 6, ADB SR 2)</b>					
5.1	<p>Prepare, disclose, and implement the <b>Resettlement Plan (RP)</b> for the Project based on the principles and requirements stipulated in the <b>Project Resettlement Framework (RF) and Lenders' policy requirements</b></p>	<p>Avoiding / mitigating impact on livelihoods of the Project-affected people (PAP)</p> <p>Prevention of</p>	<p>EBRD PR 5</p> <p>EIB ESS 6</p> <p>ADB SR 2, ADB's Involuntary Resettlement</p>	<p>RD with support of the Resettlement &amp; Livelihood Restoration Consultants</p> <p>External</p>	<p>RP implemented and compensations for lost assets to be paid prior to the start of the construction. Livelihood restoration completed for all affected people</p>	<p>The Resettlement Plan approved by all relevant parties, disclosed, and implemented.</p>

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	Implementation of the RP is verified via Compliance Report(s) prepared by External Resettlement Monitor and submitted to Lenders for acceptance (see Action 1.11).  The ToR for External Monitor submitted to Lenders for approval.	conflict / improving relations with the PAPs	Safeguards: Implementation Good Practice Sourcebook (2012)  National legislation	Resettlement Monitor hired by the RD	before final disbursement and onwards	Compliance Report(s) submitted and accepted by Lenders.  ToR for External Monitor approved by the Lenders (as per Action 1.11).
5.2	Conduct a <b>Resettlement Completion Audit</b> after fully implementing the Resettlement Plan including full delivery of the livelihood restoration measures.	Evaluating the effectiveness of the Resettlement Plan delivery and ensure no negative impacts on the PAPs		External Resettlement Consultant hired by the RD	Upon completion of livelihood restoration measures as per the schedule in the Resettlement Plan	The Terms of Reference for the Completion Audit agreed with the Lenders. Completion Audit Report approved by the Lenders.
<b>6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources (EBRD PR 6, EIB ESS 4, ADB SR 1)</b>					
6.1	Ensure the implementation of the <b>Biodiversity Action Plan (BAP)</b> , including dedicated biodiversity mitigation and monitoring actions, with the objective to achieve a 'net gain' / "no net loss" where appropriate.	Avoidance of biodiversity loss and protection of Critical Habitat and Priority Biodiversity Features	EBRD PR 6 and Guidance Note for PR 6 (2020)  EIB ESS 4 and Guidance Note for standard on Biodiversity and Ecosystems (2018)  ADB SR 1  National legislation	RD, with support of consultants Lenders – to approve	BAP developed prior to construction and implemented during the Project life, and updated as appropriate	BAP effectively implemented  No net loss of natural habitats and a net gain of critical habitats is achieved.
6.2	Ensure qualified staff (biodiversity experts) are appointed by the Contractor and Supervision Engineer for biodiversity implementation and monitoring, respectively, and relevant budgets approved (see also Action 1.4).			Contractor Supervision Engineer	Prior to construction	Qualified biodiversity specialist appointed at the Contractor and Supervision Engineer
6.3	Develop and implement the Biodiversity Offset Management Plan based on the principles developed in the BAP (Biodiversity Offsetting Strategy section)			RD, with support of PIU consultant	At least three months prior to construction	Biodiversity Offset Management Plan adopted and implemented
6.4	Implement i) pre-construction surveys as defined in the BAP, and ii) additional field surveys if those Project's components, the locations of which are presently unknown (including SDAs, access roads to them, construction camps, lay-down areas, batching /asphalt plants), are proposed outside the studied areas.			Contractor	Prior to deciding about siting a Project component	Studies completed and mitigation developed as needed Updated BAP approved by Lenders

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Based on the studies, update the BAP (if needed) accordingly, and agree with Lenders					
6.5	Update the detailed design to include the required passages for wild animals as per GIP and BAP recommendations.			RD with Contractor – to update the design	During the update of the detailed design	Passages for wild animals are integrated in the detailed design
6.6	Maintain green bridges/underpasses/ culverts designed for wild animal passage as per GIP and BAP recommendations			RD	During operations / maintenance	Action implemented effectively
6.7	Comply with seasonal prohibitions as defined in the BAP. Limit secondary roads for maintenance and dumping sites between the DK35+000 and DK60+000, as much as possible.			Contractor	During the construction	Action implemented effectively
<b>7</b>	<b>Cultural Heritage (EBRD PR 8, EIB ESS 10, ADB SR 1)</b>					
7.1	Prepare, disclose, and implement the mitigation measures for cultural heritage contained in the <b>Cultural Heritage Management Plan (CHMP)</b> and ESMP including registration of the identified cultural heritage sites and enforcing legally required protection measures.	Preservation of cultural heritage  Reduction of risk of impacts on known cultural heritage	National legislation  EBRD PR 8, EBRD's guidance note for PR8 (2023)  EIB ESS 10  ADB SR 1	RD in cooperation with the regulator for the cultural heritage.  Contractor Supervision Engineer	The CHMP finalized and disclosed prior to the start of the construction.	CHMP submitted to Lenders for approval
7.2	Verify the implementation of the CHMP via an External Audit Completion Report (approved by Lenders). The ToR for preparing an External Audit Completion Report submitted to Lenders.			External Monitoring Consultant	Prior to the end of the construction works, External Audit Completion Report prepared and submitted to Lenders	ToR for the External Audit Completion Report approved by Lenders External Audit Completion Report approved by Lenders
7.3	Develop and implement the <b>Chance Finds Procedure</b> <sup>4</sup> .	Preventing damage to or		Contractor	Adoption - prior to construction;	Procedure adopted prior to construction

<sup>4</sup> A template of this procedure is provided in the 2023 EBRD's guidance note for PR8 at <https://www.ebrd.com/documents/environment/guidance-note-performance-requirements-8-cultural-heritage.pdf>, and the national requirements are defined by the RA Law No. HO-261 (1998) "On the protection and use of immovable historical and cultural monuments and historical environment".

No.	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Lenders' standards, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation
	Ensure that its implementation is supervised by the on-site Cultural Heritage Expert of the Contractor and overseen by the Cultural Heritage Monitor of the Supervision Engineer.	destruction of cultural heritage		Supervision Engineer	Training of the contractor workers - prior to construction; implementation - during earth works	Relevant training provided to construction contractor workers Procedure effectively applied in case of findings
<b>8</b>	<b>Information Disclosure and Stakeholder Engagement (EBRD PR 10, EIB ESS 2, ADB SR 1 and 2 and cross-cutting requirements in lenders policies)</b>					
8.1	Implement the Project's <b>Stakeholder Engagement Plan</b> (SEP) including the disclosure and access to information requirements.  Regularly review, update and disclose the SEP, as necessary	Continuous information dissemination and engagement with affected stakeholders.  Preventing conflicts / complaints.	EBRD PR10, Access to Information Directive (2019), Guidance note to PR 10 (2023), Guidance Note on Grievance Management.  ESS 2 (2022), Transparency Policy (2011), and a Guidance note on Stakeholder Engagement (2020).  ADB SR 1 and 2 & Access to Information Policy (2018)	RD	Throughout the Project lifecycle	The SEP is implemented (evidence can be provided), updated and disclosed as relevant.  All safeguards reporting will be disclosed by the Lenders in English and RD in English and Armenian.
8.2	Appoint a competent communication / liaison / stakeholder engagement specialist to be responsible for the implementation of the SEP	Improving relations with stakeholders and local communities.		RD	Prior to construction	SEP implementation specialist / liaison officer appointed and guides the SEP delivery / prepares reports
8.3	Appoint Community Liaison Officers responsible for the implementation of the SEP at the level of the Project sites (ensure that at least one such officer is a female)	Insuring that grievances are dealt with properly	National regulations	Contractor	Prior to the start of construction	Community Liaison Officers appointed and prepare monthly reports on the SEP implementation activities to the RD
8.4	Implement and communicate the grievance mechanism for communities and external stakeholders in line with lenders' requirements, to include, <i>inter alia</i> , anonymous and confidential grievance channels and redress.			RD	Grievance mechanism communicated prior to construction at specific sections; maintenance - throughout the Project lifecycle	The grievance mechanism effectively implemented and communicated A Grievance Log maintained to reflect the status of each grievance and actions taken Grievance results analyses and reported in the regular E&S monitoring reports to the Lenders