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## ARMENIA - SRC BCP MODERNISATION PROJECT

### Environmental and Social Assessment for EBRD

## STAKEHOLDER ENGAGEMENT PLAN

Rev02

March - 2026

Prepared for:  
European Bank for Reconstruction  
and Development  
*and*  
State Revenue Committee of the  
Republic of Armenia



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**Consultancy Services Contract № 2025.013775**

Prepared for:

- European Bank for Reconstruction and Development
- State Revenue Committee of the Republic of Armenia

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## List of Abbreviations

BCP	- Border Crossing Point
CJSC	- Close Joint Stock Company
CLO	- Community Liaison Officer
EBRD	- European Bank for Reconstruction and Development
ESAA	- Environmental and Social Audit and Assessment
ESAP	- Environmental and Social Action Plan
ESHS	- Environmental, Social, Health, and Safety
ESP	- Environmental and Social Policy
ESR	- Environmental and Social Requirements
EU	- European Union
E&S	- Environmental and Social
GIP	- Good International Practice
GM	- Grievance Mechanism
GoA	- Government of Armenia
MoE	- Ministry of Environment
MoF	- Ministry of Finance
MoIA	- Ministry of Internal Affairs
NTS	- Non-Technical Summary
OHS	- Occupational Health and Safety
PR	- Performance Requirement
RoA	- Republic of Armenia
SRC	- State Revenue Committee
ToR	- Terms of Reference

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## 1. Introduction

### 1.1 Project Background

The European Bank for Reconstruction and Development ("the Bank" or the "EBRD") is considering providing a loan to the State Revenue Committee ("the SRC" or the "Client") for the acquisition of essential, modern customs equipment, including: inspection X-rays/scanners for trucks and for cargo, railway scales, static load scales, detection handheld equipment and handheld X-ray devices for Armenia's Border Crossing Points ("BCPs").

The Project is strongly supported by the Government of Armenia ("GoA") in its effort to improve the efficiency of customs operations on Armenia's borders including facilitating more efficient and effective customs clearance, which contributes to tackling circumvention risks and illicit trade.

The Borrower is the Republic of Armenia ("RoA"), represented by the Ministry of Finance ("the MoF"). The Implementing Agency is the RoA State Revenue Committee. The SRC is a regulating body, established under Armenian law, to regulate tax services, customs regulations, and customs services in Armenia.

The Project is categorised Category "B" in accordance with the EBRD Environmental and Social Policy (ESP) (2024)<sup>1</sup>. ATMS Solutions LLC (the "Consultant") has been engaged by the Bank to conduct an Environmental and Social (E&S) Assessment of both the Project and the Client's existing operations (the "Assignment").

As part of the Assignment, the Consultant has identified the Project's stakeholders, defined meaningful and culturally appropriate methods and measures for stakeholder engagement, proposed a grievance mechanism for the Project, and presented all of these elements in this Stakeholder Engagement Plan (SEP).

### 1.2 Objectives of the SEP

This SEP is a living public document that sets out SRC's commitments to stakeholder engagement, consultation, and disclosure activities related to the Project. It has been prepared in accordance with the EBRD's ESP (2024).

The objectives of SEP are to:

- Present the national legal framework and the EBRD's requirements in relation to stakeholder engagement process,
- Identify all Project stakeholders, including those who might be considered vulnerable<sup>2</sup> and might need more support during the consultation process and throughout the entire project cycle,
- Develop a stakeholder engagement programme that will be implemented to ensure that the E&S information on the Project is timely provided and properly communicated to the Project's stakeholders, and the feedback communication channels are available to them,

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<sup>1</sup><https://www.ebrd.com/documents/environment/environmental-and-social-policy-2024-pdf.pdf>

<sup>2</sup>Persons or groups of people who: (i) may be disproportionately affected by project impacts or more limited than others in their ability to access project benefits, due to being discriminated against, marginalised and/or excluded on the basis of characteristics such as, but not limited to, their sex or gender, sexual orientation, gender identity, gender expression and/or sex characteristics, religion, national origin, race, ethnicity, indigenous status, age (including children, youths and older persons), physical or mental disability, literacy, political views and affiliations, or socioeconomic status and (ii) people in situations of vulnerability, such as people living below the poverty line, the landless, single-headed households, natural resource-dependent communities, migrant workers, refugees or internally displaced people, as well as people affected by conflict or natural disasters

- Define the means of engaging with the identified stakeholders in a meaningful and culturally appropriate way,
- Propose a procedure or a mechanism for receiving, registering and addressing grievances and suggestions from stakeholders.

## 2. Project Overview

The EBRD loan will finance the acquisition of modern customs equipment and devices for Armenia's BCPs, essential to enhance customs operations. The Project aims to improve the efficiency of customs operations at Armenia's borders, including facilitating more effective and streamlined customs clearance processes. These improvements contribute to addressing circumvention risks and illicit trade, and have received strong support from the Government of the Republic of Armenia.

## 3. Stakeholder Engagement and Information Disclosure Requirements

This section summarises the national legislative requirements and the Lender's ESP requirements that govern stakeholder engagement and consultation processes.

### 3.1 National Requirements

**Table 1. Requirements of the applicable national legal acts and ratified by the GoA conventions**

Legal act	Applicable Requirements
RoA Constitution (2015, last revision 2020) <sup>3</sup>	<p><b>Article 12. Environmental protection and sustainable development</b></p> <p>The State shall promote the protection, improvement and conservation of the environment, and the rational use of natural resources, guided by the principle of sustainable development and with due regard for the responsibility toward future generations. Everyone shall have the duty to care for the protection of the environment.</p> <p><b>Article 42. Freedom of opinion and expression</b></p> <p>Everyone has the right to freedom of expression. This right includes the freedom to hold opinions and to seek, receive, and impart information and ideas through any media, without interference by public authorities and regardless of frontiers.</p> <p>Freedom of expression may be restricted only by law and solely for the purpose of protecting national security, public order, public health or morals, the honor and reputation of others, or other fundamental rights and freedoms.</p> <p><b>Article 51. The right to receive information</b></p> <p>Everyone has the right to receive information about the activities of state and local self-government bodies and officials, and to access their documents. This right may be restricted only by law for the purpose of protecting public interests or the fundamental rights and freedoms of others.</p>

<sup>3</sup><https://www.arlis.am/hy/acts/143723>

Legal act	Applicable Requirements
<p><b>RoA Law "On Freedom of Information" (2003)<sup>4</sup></b></p> <p><b>RoA Government Decree №1204-N</b> dated 05.10.2015 on approval of:</p> <p><i>Annex 1. Procedure for registering, classifying, and storing information processed by or submitted to the information holder</i></p> <p><i>Annex 2. Procedure for providing information or its copy by state and local self-government bodies, state institutions and organizations</i></p>	<p><b>Article 6. Exercise of the right to information</b></p> <p>Everyone has the right to access the information he/she seek and/or to submit a request to the information holder in accordance with the procedure prescribed by law, and to receive such information.</p> <p><b>Article 7. Ensuring access to and transparency of information</b></p> <p>The holder of the information shall develop and publish its procedure for providing information, as prescribed by law, and shall make it available at its premises in a place accessible and visible to all.</p> <p><b>Article 9. Procedure for submitting and addressing enquiries</b></p> <p>The information requested in an enquiry shall be provided within five (5) days if it has already been published, or within thirty (30) days if additional research or work is required to respond to the enquiry.</p>
<p><b>RoA Law "On Fundamentals of Administration and Administrative Proceedings"(2004)<sup>5</sup></b></p>	<p><b>Article 3. Main definitions</b></p> <p>Administrative bodies in Armenia are: i) RoA ministries and other state authorities, ii) Regional administrations, and iii) Local self-governmental bodies: head of communities and community council.</p> <p><b>Article 46. Terms of administrative proceedings</b></p> <p>The maximum time period for the administrative proceeding equal to 30 days. The law may define special terms, shorter than 30 days or longer time periods. According to the law, applications to administrative body shall be submitted in written form and shall contain full name of an applicant (natural or legal person), address, name of administrative body to which application is submitted, etc.</p>
<p><b>Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, Aarhus Convention (1998)<sup>6</sup></b></p> <p>Ratified by the RoA in 2001</p>	<p>This Convention provides for the right of everyone to receive environmental information that is held by public authorities; to participate in environmental decision-making; and to review procedures to challenge public decisions that have been made without respecting the two aforementioned rights or environmental law in general. 15 Aarhus centers operate in Armenia: one in Yerevan and 14 in regions<sup>7</sup>.</p>

*Based on the expert assessment of the Consultant, the proposed Project activities are unlikely to trigger the application of the national EIA legislation. Nevertheless, once the Project design documentation is developed, the need for a national EIA can be reassessed. No design or concept documents specifying the scope or volume of earthworks or construction activities have been provided.*

*Should the need for national EIA be confirmed, public hearing and consultations will be conducted in accordance with the national requirements and the SEP be revised accordingly. The SEP will also be regularly reviewed and revised as the Project progresses and in case of significant changes to the operation of the BCPs, such as, for example, re-opening or closing border control points, influx of refugees and increased transit.*

<sup>4</sup><https://www.arlis.am/hy/acts/175858>

<sup>5</sup><https://www.arlis.am/hy/acts/194274>

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

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

### 3.2 EBRD Requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD ESP (2024), which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability, including ESR10 '*Stakeholder Engagement*'. This particular Project complies with the ESP<sup>8</sup>.

In addition, the EBRD's Independent Project Accountability Mechanism<sup>9</sup>, as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP (2024) and the Project-specific provisions of its Access to Information Policy<sup>10</sup>; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

According to ESR10 stakeholder engagement involves the following elements:

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

The EBRD also developed a '*Guidance note to PR 10: Information disclosure and stakeholder engagement*' (2023)<sup>11</sup> that provides EBRD clients and stakeholders with practical guidance for interpreting and implementing Environmental and Social Requirement (ESR) 10 and suggests Good International Practice (GIP) approaches for various elements of stakeholder engagement.

## 4. Stakeholder Consultation and Engagement

Stakeholder consultations were undertaken by the Consultant as part of the Project's Environmental and Social Audit and Assessment (ESAA) study, particularly during the meetings and site visits conducted between August and September 2025. Site visits focused exclusively on the BCPs where stationary equipment, such as static load scales (including those for railway use) and Rapiscan truck X-ray inspection scanners, is planned for procurement and installation. The following communication tools were used during the consultation events:

- Meetings,
- Question-and-answer sessions,
- Interviews and discussions.

<sup>8</sup><https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>

<sup>9</sup><https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

<sup>10</sup><https://www.ebrd.com/what-we-do/strategies-and-policies/access-to-information-policy.html>

<sup>11</sup><https://www.ebrd.com/information-disclosure-and-stakeholder-engagement.pdf>

Key outputs of the stakeholder consultation events conducted by the Consultant within the EIAA study are summarized in **Table 2**.

**Table 2. Summary of stakeholder consultation events conducted during the ESAA study**

№	Date	Location	Participants	Topics
1	08.08.2025	SRC Head Office in Yerevan	SRC representatives from: <ul style="list-style-type: none"> <li>• Department of customs service and control at state border land checkpoints,</li> <li>• Procurement administration and administrative-economic support department,</li> <li>• International cooperation department,</li> <li>• Staff management department,</li> <li>• Financial accounting department,</li> <li>• Information and public relations.</li> </ul>	<ol style="list-style-type: none"> <li>1) Presentation of the Project’s objectives and scope of work,</li> <li>2) Presentation of the criteria for conducting the ESAA study, including EBRD PRs applicable for the Project,</li> <li>3) Interpretation of the request for information related to the E&amp;S performance of existing customs service operations and facilities submitted by the Consultant to the SRC on 02.08.2025,</li> <li>4) Existing grievance mechanisms of the SRC,</li> <li>5) Discussion of the planned dates of site visits,</li> <li>6) Question-and-Answer session.</li> </ol>
2	01.09.2025-02.09.2025, 04.09.2025, 22.09.2025	BCPs	<ul style="list-style-type: none"> <li>• Representatives of the SCR Head Office,</li> <li>• Head or Deputy Head of the BCPs,</li> <li>• Shift managers,</li> <li>• Custom service inspectors,</li> <li>• Personnel responsible for administrative and economic matters.</li> </ul>	<ol style="list-style-type: none"> <li>1) Presentation of the Project’s objectives and scope of the E&amp;S audit,</li> <li>2) Discussion of water use and discharge, waste generation, storage and disposal, sources of air emissions, and related issues,</li> <li>3) Availability of permits for air emissions, water use, waste generation and disposal, and other regulatory requirements,</li> <li>4) Assessment of fire-fighting systems, fire extinguishing equipment, evacuation plans, and related emergency preparedness measures,</li> <li>5) Health and safety considerations, including working conditions, X-ray radiation risks, and other OHS hazards,</li> <li>6) Availability of sanitary and hygienic facilities for visitors,</li> <li>7) Social issues, including visitor complaints and the grievance mechanism,</li> <li>8) Planned equipment installations at the BCPs and potential benefits, including reduced OHS risks,</li> <li>9) Question-and-answer sessions.</li> </ol>

## 5. Stakeholder Identification and Analysis

As per the EBRD's ESP ESR10, stakeholders are defined as the various individuals or groups who:

- i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties), or
- ii) may have an interest in the Project (other interested parties).

### 5.1 Stakeholder Identification Methodology

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

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

Stakeholder engagement requires identification of the stakeholders considering the above criteria and selection of the appropriate methods for engagement with them.

### 5.2 Key Stakeholder Categories and Groups

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

- **Internal stakeholders**, representing entities involved in the implementation of the Project, their management, staff and shareholders, as well as contractors and subcontractors involved in the project and benefiting from its implementation (investors, shareholder); and
- **External stakeholders**, representing the groups or individuals not involved in the Project, authorities involved (which will be involved) in the project approval process; people affected by the project; and the interested public.

In order to ensure effective and meaningful engagement, **the Project's external stakeholders** have been clustered into the following groups in line with EBRD ESR10:

- **Potentially affected parties** (those on whom the Project implementation may have a direct impact); within these parties **potentially vulnerable groups** are identified,
- State authorities,
- Local self-government bodies, including participating municipalities and settlements,
- Other interested parties (mass media, local businesses, etc.).

### 5.3 Stakeholder Analysis

A list of external stakeholder groups and their relation to and/or interests in the Project, identified on the basis of desktop review, meetings and consultations, is presented in **Table 3**. Based on this list, the Client will develop and keep updated a Stakeholder Registry with names, titles and contact details of stakeholders. This information will remain confidential and will only be collected and stored with the consent of the stakeholder and for the purpose of receiving information on the Project.

Any stakeholder that is not included in the Table 4, but wishes to receive information about the Project and its E&S aspects and impacts can approach the Client (see contacts in Section 6) with a request to be included in the stakeholders register.

**Table 3. External stakeholders, their relation to / interests in the Project and engagement methods**

Stakeholder Groups	Interests / Relations / Involvements	Communication tools
<b>POTENTIALLY AFFECTED PARTIES</b>		
<p><b>Visitors and travelers</b> from Iran and Georgia entering Armenia, as well as those departing from Armenia to Iran and Georgia through the land BCPs.</p>	<p><b>May be affected by:</b></p> <ul style="list-style-type: none"> <li>• short-term noise and air emissions resulting from ongoing earthworks,</li> <li>• movement of construction vehicles within the BCPs</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• new modern equipment (static load scale, truck X-ray inspection, etc.) and devices that facilitating custom clearance and freight check-up services,</li> <li>• access to a grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Notices at information boards</li> <li>• Mass media communication</li> <li>• Face to face meetings</li> </ul>
<p><b>Drivers of heavy trucks</b> transporting or transiting freight between Iran, Georgia, and Armenia through the land BCPs.</p>	<p><b>May be affected by:</b></p> <ul style="list-style-type: none"> <li>• possible delays during customs checks due to the installation of new equipment (static load scale, truck X-ray inspection system, etc.),</li> <li>• short-term noise and air emissions resulting from ongoing earthworks.</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• new modern equipment (static load scale, truck X-ray inspection, etc.) and devices that facilitating custom clearance and freight check-up services,</li> <li>• access to a grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Notices at information boards</li> <li>• Mass media communication</li> <li>• Face to face meetings</li> </ul>
<p><b>Passangers</b> crossing the border between Armenia and Georgia by railway via the Ayrum BCP.</p>	<p><b>May be affected by:</b></p> <ul style="list-style-type: none"> <li>• possible delays during customs checks due to the installation of new equipment (railway scale, overpass, etc.),</li> <li>• short-term noise and air emissions resulting from ongoing earthworks.</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• the introduction of modern equipment and detection devices aimed at facilitating inspection procedures and enhancing security,</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Notices at information boards</li> <li>• Mass media communication</li> <li>• Face to face meetings</li> </ul>

Stakeholder Groups	Interests / Relations / Involvements	Communication tools
	<ul style="list-style-type: none"> <li>• access to a grievance mechanism.</li> </ul>	
<p><b>Aircraft Passengers</b> arriving in and departing from Armenia through the Zvartnots and Gyumri Airports BCPs.</p>	<p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• the introduction of modern equipment and detection devices aimed at facilitating inspection procedures and enhancing security,</li> <li>• access to a grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Notices at information boards</li> <li>• Mass media communication</li> <li>• Face to face meetings</li> </ul>
<p><b>"South Caucasus Railway" Closed Joint Stock Company (CJSC)<sup>12</sup></b> - within the area of the Ayrum railway station provided facilities to support the operation of the Ayrum BCP.</p>	<p><b>May be affected by:</b></p> <ul style="list-style-type: none"> <li>• the availability of construction machinery within the area of Ayrum station and along the railway,</li> <li>• movement of heavy trucks convening railway scale and overpass along the railway,</li> <li>• the increased health safety risks,</li> <li>• increased responsibility over the security issues,</li> <li>• short-term noise and air emissions resulting from ongoing earthworks.</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• information about the new equipment to be installed, its progress and E&amp;S impacts,</li> <li>• the introduction of modern equipment and detection devices aimed at facilitating inspection procedures and enhancing security.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Mass media communication</li> <li>• Individual meetings</li> <li>• Letters / E-mails /Calls</li> </ul>
<b>POTENTIALLY VULNERABLE GROUPS</b>		
<p>Families with children, pensioners, persons with physical or mental disabilities, and pregnant women passing through the BCPs.</p>	<p><b>May be potentially affected by:</b></p> <ul style="list-style-type: none"> <li>• short-term noise and air emissions resulting from ongoing earthworks.</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• the introduction of modern equipment and detection devices aimed at facilitating inspection procedures and enhancing security,</li> <li>• availability of waiting halls with potable water, coffee or tea services, and nursing rooms,</li> <li>• access to a grievance mechanism.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Notices at information boards</li> <li>• Mass media communication</li> <li>• Face to face meetings</li> </ul>

<sup>12</sup>The railway operator established under the concession agreement signed in 2008 between the Government of the Republic of Armenia and "Russian Railways" Open Joint Stock Company (OJSC)

Stakeholder Groups	Interests / Relations / Involvements	Communication tools
<b>STATE AUTHORITIES</b>		
RA State Revenue Committee (SRC) Custom Service under the SRC	<b>May be interested in:</b> <ul style="list-style-type: none"> <li>• effective and safe operation of BCPs,</li> <li>• enhanced customs clearance procedures,</li> <li>• improved detection of prohibited freight, materials and goods,</li> <li>• strengthened capacity for detecting contraband,</li> <li>• improved health and safety procedures and practices.</li> </ul>	<ul style="list-style-type: none"> <li>• Private meetings</li> <li>• Disclosure of written information</li> <li>• E-mails / Letters / Phone calls</li> </ul>
RA National Security Service (NSS) Border Guard Troops under the NSS	<b>Involved in:</b> <ul style="list-style-type: none"> <li>• organizing the protection of the RA state border and determining the forms and methods of their operational and combat service activities,</li> <li>• combating terrorism, smuggling, illegal migration and other criminal activities.</li> </ul> <b>May be interested in:</b> <ul style="list-style-type: none"> <li>• strengthened capacity for detecting contraband.</li> </ul>	<ul style="list-style-type: none"> <li>• Private meetings</li> <li>• Disclosure of written information</li> <li>• E-mails / Letters / Phone calls</li> </ul>
RA Food Safety Inspection Body	<b>May be interested in:</b> <ul style="list-style-type: none"> <li>• improved detection of prohibited freight, materials and goods.</li> </ul>	<ul style="list-style-type: none"> <li>• Private meetings</li> <li>• Disclosure of written information</li> <li>• E-mails / Letters / Phone calls</li> </ul>
RA Ministry of Environment	<b>Involved in:</b> <ul style="list-style-type: none"> <li>• issuing air emissions and water use permits,</li> <li>• approving hazardous waste passports, waste generation norms, and disposal limits.</li> </ul> <b>May be interested in:</b> <ul style="list-style-type: none"> <li>• ensuring the operation of BCPs in accordance with air emissions and water use permits, as well as established hazardous waste limits.</li> </ul>	<ul style="list-style-type: none"> <li>• Private meetings</li> <li>• Disclosure of written information</li> <li>• E-mails / Letters / Phone calls</li> </ul>
<b>LOCAL SELF-GOVERNMENT BODIES</b>		
<ul style="list-style-type: none"> <li>- Alaverdi enlarged community and its Ayrum settlement</li> <li>- Noyemberyan enlarged community and its Bagratashen settlement</li> <li>- Ashotsk enlarged community and its Bavra settlement</li> <li>- Tashir enlarged community and its Gogavan settlement</li> </ul>	<b>Involved in:</b> <ul style="list-style-type: none"> <li>• issuing construction permits and participating in the commissioning of installed equipment (where required),</li> <li>• ensuring access to communal infrastructure,</li> </ul>	<ul style="list-style-type: none"> <li>• Joint site visits</li> <li>• Public meetings</li> <li>• Private meetings</li> <li>• E-mails</li> <li>• Letters / Disclosure of written information</li> <li>• Phone calls</li> </ul>

Stakeholder Groups	Interests / Relations / Involvements	Communication tools
<ul style="list-style-type: none"> <li>- Meghri enlarged community and its Agarak settlement</li> <li>- Yerevan city</li> <li>- Gyumri city</li> <li>- Metsamor enlarged community and its Margara settlement.</li> </ul>	<ul style="list-style-type: none"> <li>• allocating areas for construction waste and spoil disposal,</li> <li>• holding discussions and meetings with representatives of the SRC and BCP.</li> </ul> <p><b>May be interested in:</b></p> <ul style="list-style-type: none"> <li>• understanding the Project's potential positive and negative E&amp;S impacts,</li> <li>• developing businesses stimulated by Project implementation,</li> <li>• employment opportunities arising from the Project implementation.</li> </ul>	
<b>OTHER INTERESTED PARTIES</b>		
Mass media	Coordinated and regular communication with the media will be essential to ensure that Project updates are shared with the target audience in a timely manner and to build trust, thereby preventing potential reputational crises.	<ul style="list-style-type: none"> <li>• Public meetings</li> <li>• Mass Media communication / Press releases</li> </ul>
Local business	<p><b>May be involved in:</b></p> <ul style="list-style-type: none"> <li>• procurement of construction materials,</li> <li>• construction activities as subcontractors.</li> </ul>	<ul style="list-style-type: none"> <li>• Disclosure of written information</li> <li>• Tender and procurement announcements.</li> </ul>

## 4 Stakeholder Engagement Programme

The Stakeholder Engagement Programme (**Table 4**) has been developed to ensure effective engagement with all identified stakeholders regarding the key environmental and social effects (both positive and negative) anticipated from the Project implementation, foster and maintain respectful relationships between the Client and stakeholders, and prevent potential conflicts.

### 6.1 Potential Environmental and Social Effects

The environmental, social and safety benefits may include, but are not limited to:

- **Reduced health and safety risks** associated with the installation of new equipment, including static scales, railroad overpasses, X-ray inspection systems, mobile trace detection devices, etc.,
- **Short-term employment opportunities** created during the project's implementation phase,
- **Enhanced operational efficiency** of the new static scales, which will eliminate the need for winter maintenance, particularly at the Bavra BCP,
- **Decreased carbon emissions** resulting from the purchase and use of electric shuttles, electric scooters, electric forklifts and other eco-friendly equipment.

The potential adverse environmental and social impacts may include, but are not limited to:

- **Short-term noise and dust emissions** during earthworks required for the installation of static scales and X-ray detection systems at the BCPs,
- **Generation and disposal of construction waste** during earthworks and the installation of new equipment at the BCPs,
- **Potential accidents<sup>13</sup> and incidents<sup>14</sup>** occurring during Project implementation activities,
- **Increased traffic congestion** resulting from the transportation of large, bulky equipment to the BCPs.

## 6.2 Information Disclosure Activities

In addition to the stakeholder consultation and engagement activities already conducted for the Project (as summarized in **Chapter 4**), the Client will be available to the stakeholders as the Project progresses. Information will be provided in both Armenian and English, covering all key stages of Project implementation. The following documents will be made available (disclosed) to ensure effective communication with stakeholders:

- Non-Technical Summary (NTS),
- Environmental and Social Action Plan (ESAP),
- SEP (this document).

These documents will be disclosed in both Armenian and English online on the SRC official website: <https://www.src.am>.

## 6.3 Consultation Methods

Different consultation approaches and methods will be applied throughout the various phases of project implementation, tailored to the needs of different stakeholder groups. The primary communication methods and mechanisms for engaging with key stakeholders will include:

### 6.3.1 Consultations with the communities

Consultations with the official representatives of the communities hosting the BCPs will be conducted to:

- Inform them about the Project, its components, the types of works to be undertaken at the BCP located within the community's administrative boundaries, and the associated environmental and social impacts and opportunities,
- Obtain a construction permit from the community, if required,
- Obtain permit for the disposal of construction waste generated during earthworks and equipment installation in the communal landfill,
- Request support from the community leadership when meetings with local residents are necessary.

*Consultation methods:* public and face-to-face meetings, applications, e-mails and letters.

### 6.3.2 Consultations with the State authorities

To obtain permits for air emissions, water use, and waste generation and disposal, consultations with the Ministry of Environment (MoE) will be conducted through applications submitted via the *'Digital*

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<sup>13</sup>Any unplanned or unexpected event that results in injury, illness, fatality, or significant damage to the property and environment.

<sup>14</sup>Any event, occurrence, or situation that has caused or could have caused harm or damage, including near-misses.

*Service Platform for Environmental Governance'* online portal, as well as through emails, letters, and phone calls. Feedback from the MoE will be received via the online portal and emails.

### 6.3.3 Consultations with "South Caucasus Railway" CJSC

Consultations with authorized representatives of "South Caucasus Railway" CJSC, the railway operator established under the 2008 concession agreement between the Government of the Republic of Armenia and "Russian Railways" OJSC, will be conducted regarding the installation of the static scale and railroad overpass at the Ayrum railway station for the needs of the Ayrum BCP. As the area designated for this equipment falls under the responsibility of "South Caucasus Railway" CJSC, the contractual obligations between the parties must be discussed, agreed upon, and properly documented.

*Consultation methods:* public and face-to-face meetings, e-mails and letters.

### 6.3.4 Consultations with the affected people

Passengers and visitors crossing the Armenian border, as well as drivers of heavy trucks transporting or transiting freight between Iran, Georgia, and Armenia, will be informed about the temporary inconveniences caused by the Project, including short-term noise and air emissions associated with earthworks and the installation of static scales and RAPISCAN X-ray inspection equipment.

Drivers should also be informed about the benefits of the new equipment, including reduced customs clearance times, streamlined procedures, and improved detection capabilities for contraband and prohibited goods and materials.

In addition, vulnerable persons will be consulted regarding the availability and locations of sanitary and hygiene facilities, waiting halls with potable water, coffee or tea services, and nursing rooms.

*Consultation methods:*

- Banners and information boards at the entrances of customs clearance facilities (in Armenian and English, and additionally in Georgian near BCPs located along the Georgian border, and in Persian/Farsi at the Meghri BCP),
- Face-to-face meetings,
- Public announcement systems,
- Mass media communications.

The Stakeholder Engagement Programme provides a specific action plan with the distribution of responsibilities and a timeframe for implementation of the suggested activities. If there would be changes during the Project implementation that require modification of the engagement mechanisms and / or new stakeholders are identified, the Programme should be revised and updated.

**Table 4. Stakeholder Engagement Programme**

№	Activity / communication means	Target Group	Information to be disclosed	Timeframe	Responsible party	Location
1	<p>Disclosure of the E&amp;S documents related to the Project, including NTS, ESAP and SEP.</p> <p><i>Communication means: SRC website, information boards at the BCPs.</i></p>	All stakeholders	<ol style="list-style-type: none"> <li>1. NTS,</li> <li>2. ESAP,</li> <li>3. SEP,</li> <li>4. Grievance Mechanism with Public grievance form.</li> </ol>	When the NTS, ESAP and SEP will be approved by the SRC and the Bank.	SRC and relevant BCPs	<p>SRC website in Armenian (<a href="https://www.src.am/am">https://www.src.am/am</a>) and in English (<a href="https://www.src.am/en">https://www.src.am/en</a>),</p> <p>Hard copy of NTS and Grievance Mechanism in BCPs.</p>
2	<p>Consultations with the official representatives of the communities regarding:</p> <ul style="list-style-type: none"> <li>- the Project, its components, planned works, and potential E&amp;S impacts,</li> <li>- the construction permits to be obtained (if required),</li> <li>- the permit for construction waste disposal,</li> <li>- the support to be provided by community leadership when meetings with residents are needed.</li> </ul> <p><i>Communication means: public and face-to-face meetings, applications, e-mails and letters.</i></p>	Communities hosting BCPs	<ol style="list-style-type: none"> <li>1. NTS and ESAP (see item 1 above),</li> <li>2. Construction permits,</li> <li>3. Agreements for the construction waste disposal,</li> <li>4. Minutes of meetings.</li> </ol>	<p>Prior to Project implementation at the BCPs (for points 2-3),</p> <p>Within five working days (for point 4).</p>	SRC and relevant BCPs	<p>SRC website,</p> <p>Original construction permits: SRC office,</p> <p>Permit copies: Border Crossing Points (BCPs).</p>
3	<p>Consultations with the Ministry of Environment aimed at obtaining permits for air emissions, water use, and waste generation and disposal.</p> <p><i>Communication means: 'Digital Service Platform for</i></p>	All stakeholders	<ol style="list-style-type: none"> <li>1. Air emissions permits,</li> <li>2. Water use permits,</li> <li>3. Waste generation norms and disposal limits.</li> </ol>	When approved by the MoE, but not later than within one year following the signing of the loan agreement.	SRC and Bavra, Gogavan and Bagratashen BCPs - for air emission permits, SRC and Bavra, Gogavan,	<p>Websites of SRC and Ministry of Environment (<a href="http://www.env.am">www.env.am</a>),</p> <p>Original air emissions and water use permits as well as waste generation norms and disposal limits: SRC office,</p> <p>Permit copies: Border Crossing</p>

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№	Activity / communication means	Target Group	Information to be disclosed	Timeframe	Responsible party	Location
	<i>Environmental Governance</i> <sup>15</sup> <i>online portal, emails, letters, and phone calls.</i>				Bagratashen and Meghri BCPs - for water use permits, SRC and all BCPs - for waste generation norms and disposal limits.	Points (BCPs).
4	Consultations with authorized representatives of "South Caucasus Railway" CJSC will be conducted regarding the installation of the static scale and the railroad overpass at the area of Ayrum railway station for the needs of the Ayrum BCP. <i>Communication means: public and face-to-face meetings, e-mails and letters.</i>	"South Caucasus Railway" CJSC	Minutes of consultations	When the consultations will be completed	SRC and Ayrum BCP	SRC website, Mass media.
5	Communication with individuals crossing the Armenian border, as well as with drivers of heavy trucks transporting or transiting freight between Iran, Georgia, and Armenia, regarding: - temporary inconveniences caused by the Project, - short-term noise and air emissions associated with earthworks and the installation of new equipment.	Potentially affected stakeholders	Brief info about the Project, temporary inconveniences, short-terms noise and air emissions to be displayed on the banners and information boards.	During the Project implementation at the BCPs	SRC and BCPs	SRC website, Mass media, At the entrances of customs clearance facilities (in Armenian and English, and additionally in Georgian near BCPs located along the Georgian border, and in Persian/Farsi at the Meghri BCP).

<sup>15</sup>The Digital Service Platform for Environmental Governance is an electronic system established by the Government of the Republic of Armenia to streamline and digitalize environmental permitting and reporting processes. Available at: <https://nature.e-gov.am/hy/>

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**STAKEHOLDER ENGAGEMENT PLAN**

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№	Activity / communication means	Target Group	Information to be disclosed	Timeframe	Responsible party	Location
	<p><i>Communication means:</i></p> <ul style="list-style-type: none"> <li>- <i>Banners and information boards at the entrances of customs clearance facilities,</i></li> <li>- <i>Face-to-face meetings,</i></li> <li>- <i>Public announcement systems,</i></li> <li>- <i>Mass media communications.</i></li> </ul>					
6	<p>Inform drivers of heavy trucks about the benefits of the new equipment, including reduced customs clearance times, streamlined procedures and improved detection capabilities for contraband and prohibited goods and materials.</p> <p><i>Communication means:</i></p> <ul style="list-style-type: none"> <li>- <i>Banners and information boards at the entrances of customs clearance facilities,</i></li> <li>- <i>Face-to-face meetings.</i></li> </ul>	Driver of heavy trucks	Brief information about the new equipment to be installed and its potential benefits displayed on the banners and information boards.	During the Project implementation at the BCPs	SRC and BCPs	SRC website, At the entrances of customs clearance facilities (in Armenian and English, and additionally in Georgian near BCPs located along the Georgian border, and in Persian/Farsi at the Meghri BCP).
7	<p>Consult vulnerable persons regarding the availability and locations of sanitary and hygiene facilities, waiting halls with potable water, coffee or tea services, and nursing rooms.</p> <p><i>Communication means:</i></p> <ul style="list-style-type: none"> <li>- <i>Banners and information boards at the entrances of customs clearance facilities,</i></li> <li>- <i>Face-to-face meetings.</i></li> </ul>	Vulnerable persons (families with children, pensioners, persons with physical or mental disabilities and pregnant women)	Brief information to be displayed on the banners and information boards.	Starting from the Project implementation	SRC and BCPs	At the entrances of customs clearance facilities (in Armenian and English, and additionally in Georgian near BCPs located along the Georgian border, and in Persian/Farsi at the Meghri BCP).

## 5 Grievance Mechanism

As per the EBRD ESR1 and ESR10 requirements, an effective Project Grievance Mechanism (GM) should be established by the Client as early as possible in the Project development process to be aware and respond to stakeholders' concerns related to the project, especially its E&S performance, in an efficient, timely, transparent, equitable and cost-effective manner. The Project Grievance Mechanism is based on the existing SCR communication channels and national legal acts and regulations, enhanced with additional measures to comply with the EBRD's requirements.

The RA Law "On Fundamentals of Administrative Action and Administrative Proceedings"<sup>16</sup> specifies the maximum time period for the administrative proceeding equal to 30 days. The law may define special terms, shorter than 30 days or longer time periods. According to the law, applications to administrative body shall be submitted in written form and shall contain full name of an applicant (natural or legal person), address, name of administrative body to which application is submitted, etc.

The proposed GM for the Project takes into account the requirements of national regulations as well as the grievance management practices currently applied in other EBRD-financed projects in Armenia.

The Client's Community Liaison Officer (CLO) to be appointed will be responsible for coordination and handling of all grievances received from the Project stakeholders.

The Project related grievances (inquiries, complaints and requests) received by the SRC will be registered in the general database. Following registration, a decision and/or response will be communicated to the inquirer or complainant via the preferred channel specified, within one month of receipt. For inquiries and complaints that do not require further review or verification, a response will be provided within 15 days.

Grievances submitted via phone, email, post service, by hand or social media platforms (e.g., Facebook, X) will likewise be documented and duly considered. Grievances and suggestions can be addressed to the SRC using the contact details below:

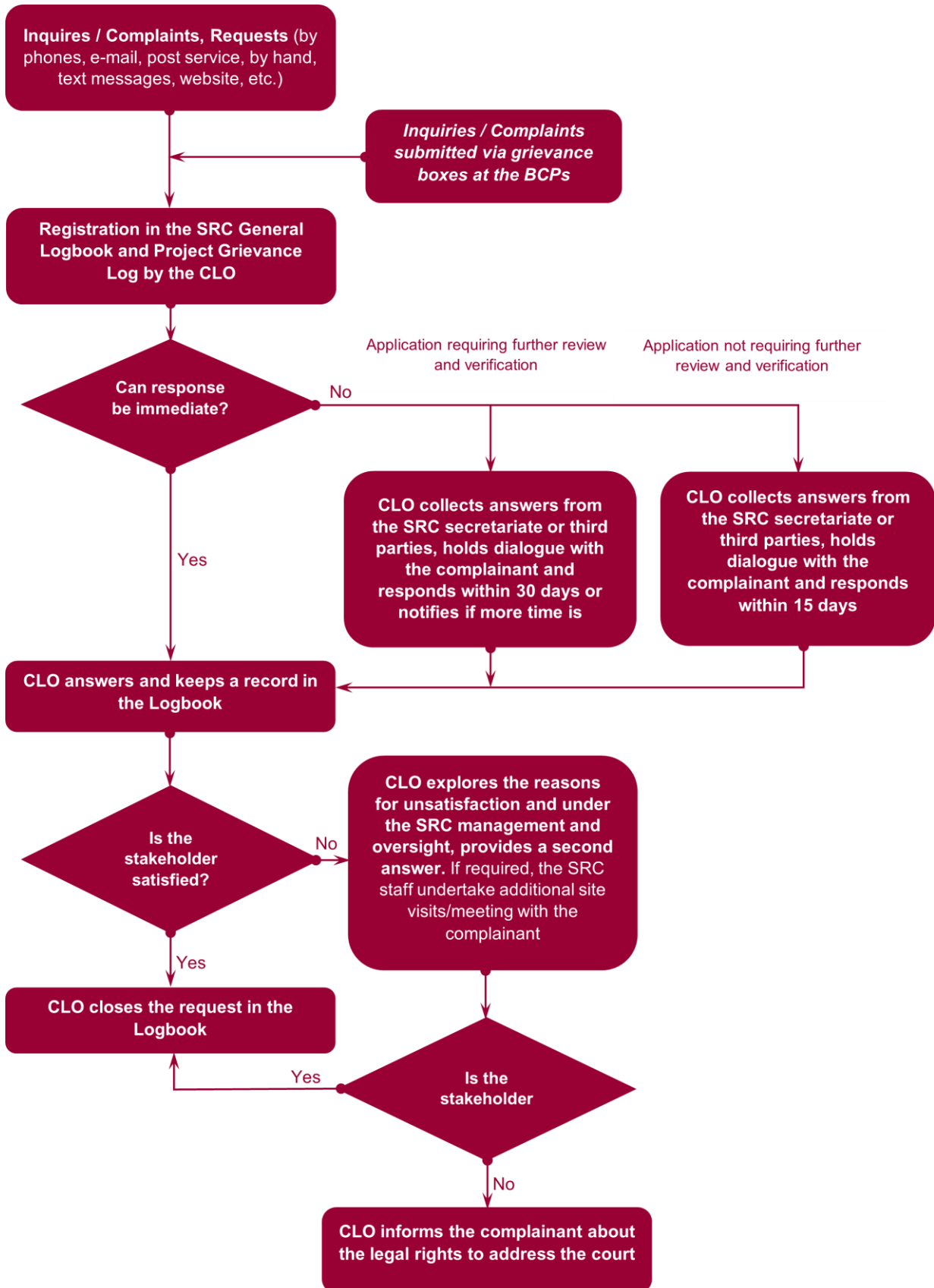
General Department of the RA SRC Secretariat	
Address:	3, 7 Movses Khorenatsi St., Yerevan, 0015, Armenia
Hot-line:	+37460 844444, 080 001 008
Phone:	+37460 844657, +37460 844659
Facebook:	<a href="https://www.facebook.com/petekamutner/">https://www.facebook.com/petekamutner/</a>
X (former Twitter):	<a href="https://x.com/petekamutner">https://x.com/petekamutner</a>
E-mail:	<a href="mailto:secretariat@petekamutner.am">secretariat@petekamutner.am</a>

The Project affected stakeholders can also place their inquiries and complaints to the grievance boxes mounted on the walls at the customs clearance facilities of all BCPs. These inquiries and complaints will be transmitted to the SRC head office within 2 working days for review and redress.

The proposed Project GM flowchart is shown in **Figure 1**.

<sup>16</sup><https://www.arlis.am/hy/acts/194274>

Figure 1. Project Grievance Mechanism Flowchart



Source: prepared by ATMS Solutions Ltd.

When the Project implementation starts, the grievances and proposals may be submitted to the SRC in writing using the Sample Grievance Form (**Annex 1**) that will be available in electronic format on the Client's website and in printed form at the customs clearance facilities of all BCPs, near the grievance boxes.

The SRC aims to protect a person's confidentiality when requested and will guarantee anonymity. Grievances can also be submitted anonymously. If a complainant prefers to submit a grievance anonymously or through a third-party, this will be accepted, and the SRC will respond to the extent feasible (e.g., via general posts on its website or information boards of the BCPs respecting anonymity of an inquirer).

The Client will establish and maintain a separate Grievance Log for the Project. It will contain all grievances regarding the Project throughout its life cycle. The following information will be recorded in the Log:

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

## 6 Monitoring, Evaluation and Reporting

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

The overall responsibility for implementing and monitoring the SEP rests with the designated specialist of the SRC Construction Programs Coordination Division under the Procurement Administration and Administrative and Economic Support Department. In carrying out the SEP and related public disclosures, this specialist will be supported by the CLO, the Head of the Procurement Administration and Administrative and Economic Support Department, and the General Secretary of the RoA SRC. The General Secretary is also responsible for preparing and submitting periodic E&S reports to the EBRD for this Project.

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

- The SEP is up to date and available to the public for review/commenting,
- Actions listed in the SEP are completed in full and as scheduled,
- The topics that were discussed and the questions that were raised during the public consultations, and follow up actions, if carried out,
- Number of stakeholders' comments and suggestions received through various feedback channels with the identification of how many women and men send them if possible, and follow up actions, if carried out,
- Number of stakeholders' grievances and claims received, disaggregated by gender, if possible,
- Number of publications on the Project implementation process in local, regional, and national media,
- Number of grievances resolved within the maximum established timeline,
- Number of grievances remaining unresolved.

All stakeholder engagement activities will be documented in the Stakeholder Engagement Log (**Annex 2**), which will be continuously updated as the Project progresses.

The Client will periodically evaluate the SEP to identify activities that may require corrective or preventive measures to improve its overall effectiveness. When such updates are necessary, the SEP will be revised accordingly and the updated version will be disclosed to the public.

If significant changes to the Project introduce additional or different E&S risks or impacts for Project-affected parties, the SRC will undertake additional consultations to explain how these risks and impacts will be managed.

The results of stakeholder engagement activities will be analyzed on a quarterly basis starting from the signing of the loan agreement. A summary of this analysis will be included in the annual E&S monitoring reports submitted to the EBRD during the first five years of operation. All E&S monitoring reports will also be published on the SRC and EBRD websites.

## Annex 1. Example Public Grievance Form

### Public Grievance Form

Reference № (for internal purpose)

Full name: First name \_\_\_\_\_

Last name \_\_\_\_\_

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

Contact information

By Post: Please provide mailing address:

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

\_\_\_\_\_

\_\_\_\_\_

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

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

Preferred Language for communication

Armenian

English

Other, please specify \_\_\_\_\_

Description of Grievance

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date of Incident/Grievance

One-time incident/grievance (date \_\_\_\_\_)

Happened more than once (how many times?)

\_\_\_\_\_

\_\_\_\_\_

On-going (currently experiencing problem)

\_\_\_\_\_

What would you like to see to resolve the problem?

\_\_\_\_\_

\_\_\_\_\_

Signature:

\_\_\_\_\_

Date:

\_\_\_\_\_

## Annex 2. Template of Stakeholder Engagement Log

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

ID/№	Engagement Activity <sup>17</sup>	Participants	Stakeholder Category	Date	Location	Initiated by	Number of participants	Purpose of Engagement	Topics discussed and issues raised	Minutes of Meeting
1										
2										
3										
...										

<sup>17</sup>Please see Table 4