

## Annex 2: Environmental and Social Action Plan (ESAP)

No.	Environmental & Social Action	E&S Risks/ Benefits	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibilities	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
<b>PR1</b>	<b>Assessment and Management of Environmental and Social (E&amp;S) Impacts and Issues</b>						
1.1	<p><b>Appointment of Consultant to Support Azeravtoyol in E&amp;S Project Preparation Activities:</b> Within the ESAP a number of E&amp;S actions are required prior to construction commencing, in addition the Tender Documents will need to be updated for EBRD's requirements. It is recommended that these actions (summarised below) are compiled into a Terms of Reference (TOR) by Azeravtoyol to procure a consultant to support them with the delivery of them:</p> <ul style="list-style-type: none"> <li>Preparation of the Resettlement Plan (working with the Azeravtoyol Land Acquisition Department (LAD)) – see action 5.1.</li> <li>Implementation of the relevant SEP actions prior to construction – see action 10.1.</li> <li>Conduct a Road Safety Audit (RSA) on the detailed design and update the detailed design for findings of the RSA- see action 4.3.</li> <li>Provision of more detail on certain E&amp;S mitigation measures (e.g. confirm locations for noise barriers for Tender documents etc.) – see actions 1.3, 1.4, 3.1-3.3, 8.1.</li> </ul> <p><b>Update Tender Documents with CESMP Requirements:</b> Consultant TOR will include the update of the draft Tender Documents, including:</p> <ul style="list-style-type: none"> <li>Update of the Tender / Contract Documents for the PR2 and PR4 clauses within the EBRD Standard Tender Document for Works – see actions 2.1 &amp; 2.5.</li> <li>All requirements of the Outline EMP and the additional requirements identified by the consultant.</li> <li>A clear requirement for the Contractor to develop a full CESMP including the separate plans required in the EIA and Outline EMP, namely: Borrow Management Plan, Spoil Management Plan, Waste Management Plan, Health and Safety Plans (Community &amp; Worker), Emergency Response Plan, and method statement for working in watercourses.</li> <li>All EBRD's E&amp;S requirements for construction projects, including reporting requirements.</li> </ul>	<p>All environmental and social issues and impacts are appropriately addressed.</p> <p>Compliance with EBRD Performance Requirements</p>	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues</p> <p>PR2 Labour &amp; Working Conditions</p> <p>PR 3: Resource Efficiency and Pollution Prevention and Control</p> <p>PR4: Health &amp; Safety</p> <p>PR5: Land Acquisition, Involuntary Resettlement and Economic Displacement</p>	<p><i>Responsibility:</i> Azeravtoyol.</p> <p><i>Resources:</i> In house</p>	<p>TOR to be prepared and issued by June 2016 and consultant to be procured as soon as possible.</p>	<p>Consultant procured and actions delivered.</p>	
1.2	<p><b>Azeravtoyol EHS Manager:</b> Designate a qualified person within Azeravtoyol to lead the EHS related work on this Project, including reporting to the Bank on ESAP implementation and EHS performance.<sup>1</sup></p>	<p>Management of Environmental, Health and Safety (EHS) risks.</p>	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues</p>	<p><i>Responsibility:</i> Azeravtoyol.</p> <p><i>Resources:</i> In house</p>	<p>Immediately</p>	<p>Notification of named individual to EBRD.</p>	

<sup>1</sup> It would be ideal if the current Azeravtoyol Environmental & Resettlement Manager could be assigned to this role.

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1.3	<p><b>Additional Detail for Construction Environmental and Social Management Plan (CESMP):</b> Azeravtoyol is to engage a consultant (as prescribed in 1.1 above) to provide more detail on certain requirements in the Outline EMP contained in the EIA in order that these can be included in the revised Tender Documents to sufficient detail for the Contractor to budget for and implement. Issues to be detailed further include:</p> <ul style="list-style-type: none"> <li>Air quality monitoring (locations, parameters, frequency), before, during and after construction;</li> <li>Noise monitoring (locations, parameters, frequency) before, during and after construction;</li> <li>Monitoring in the watercourses (locations, parameters, frequency) before, during and after construction;</li> <li>Locations where noise barriers are to be established, and details thereof.</li> </ul> <p>Consultant to review EIA, ESAP and Outline EMP to identify if any other issues need to be detailed more clearly within the Tender Documents for the Contractor.</p>	All environmental and social issues and impacts identified in the EIA are appropriately addressed in the construction contract.	PR1: Assessment and Management of Environmental and Social Impacts and Issues	<p><i>Responsibility:</i> Azeravtoyol to procure Consultant. Contractor to implement.</p> <p><i>Resources:</i> Azeravtoyol to cover consultant costs.</p> <p>Contractor to include for actions in Tender Price.</p>	Prior to finalisation of Tender Documents.	<p>Appropriate sections on E&amp;S Management and Monitoring in revised Tender Documents.</p> <p>Contractor's CESMP to be approved by Supervising Engineer.</p> <p>Monthly reports on implementation during construction contract to Supervising Engineer. Annual AESR report to EBRD.</p>	
1.4	<p><b>Operational Environmental and Social Management Plan (OESMP):</b> Azeravtoyol to develop an OESMP to include management and monitoring actions for road operation including the responsibility for implementation and supervision of OESMP actions.</p>	E&S risks during road operation.	<p>PR1: Assessment and Management of Environmental and Social Impacts and Issues</p> <p>PR3: Resource Efficiency and Pollution Prevention and Control</p>	<p><i>Responsibility:</i> Azeravtoyol to procure Consultant.</p> <p><i>Resources:</i> Azeravtoyol to cover consultant costs.</p> <p>Azeravtoyol to budget for ongoing OESMP and monitoring actions.</p>	OESMP to be developed prior to commencement of operation of the road.	<p>Completed OESMP document, available before operation begins.</p> <p>OESMP to be reviewed by EBRD.</p> <p>Annual AESR report to EBRD.</p>	
<b>PR2 Labour and Working Conditions</b>							
2.1	<p><b>Health &amp; Safety of Workers and Disease Control:</b> The optional wording under 6.7 Health &amp; Safety within EBRD's Standard Tender Document for the Works shall be included in the Tender / Contract documents.</p>	Management of health risks to workers and community health.	<p>PR2: Labour and Working Conditions</p> <p>PR 4: Health &amp; Safety</p>	<p><i>Responsibility:</i> Azeravtoyol Consultant (1.1)</p> <p><i>Resources:</i> Azeravtoyol</p>	Clause needs to be in Tender Documents prior to their issue.	Tender document updated with EBRD requirements.	
2.2	<p><b>HR Policies:</b> Contractor to prepare and implement HR Policies, these shall include provisions to prohibit use of child labour and forced labour.</p>	Effective and improved HR & workforce management.	PR2: Labour and Working Conditions	<p><i>Responsibility:</i> Contractor</p> <p><i>Resources:</i> Contractor</p>	Prior to construction commencing	HR Policies in place and approved by Supervising Engineer.	

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2.3	<b>Workforce Conduct/General Management:</b> Contractor will implement measures to manage potential impacts of influx of workers into the local area, including general measures, health surveillance, code of conduct for workers, etc. – this shall be proportional to the numbers of workers required by the Project.	Effective workforce management.	PR2: Labour and Working Conditions  PR4: Health & Safety	<i>Responsibility:</i> Contractor  <i>Resources:</i> Contractor	Measures outlined within CESMP prior to construction and implemented throughout construction.	Measures outlined in CESMP.	
2.4	<b>Siting of Worker Accommodation:</b> If dedicated worker camps have to be established these will be located appropriately and avoid sensitive areas. Consultation will be undertaken by the Contractor with the relevant Rayon Executive Authority to identify appropriate locations and minimise disturbance to local communities. Engagement with local communities where worker accommodation is proposed should be undertaken and clear contact details for dealing with any issues arising provided by the Contractor to the local communities.	Minimising disturbance to local communities.	PR2: Labour and Working Conditions	<i>Responsibility:</i> Contractor  <i>Resources:</i> Contractor	Prior to agreements over temporary land to locate worker accommodation.	Consultation complete and no complaints regarding operation of worker camps.	
2.5	<b>Use of Local Workforce:</b> Tender Documents to require Contractor to produce a HR Policy which includes a policy of i) advertising all jobs locally, ii) of encouraging and attracting local workforce (including women) to apply for jobs, and iii) of prioritising the hire of local workforce where reasonable and practical (including women where possible). Priority should be given to people affected by the Project Land Acquisition and Resettlement process who have received training for employment (see PR5 actions below). Contractor to implement policy.	Local economic benefits and restoration of livelihood affected by displacement due to the Project	PR2: Labour and Working Conditions  Good practice	<i>Responsibility:</i> Azeravtoyol responsible to procure Consultant to include in Tender documents  Contractor responsible to implement during Construction.  <i>Resources:</i> Azeravtoyol (Update of Tender Documents)  Contractor (During Construction)	Prior to finalisation of Tender Documents.	Appropriate sections on labour and workforce provisions in revised Tender Documents.  Local employment during construction should be recorded by Contractor and submitted to Supervising Engineer.  Include in annual AESR report to EBRD.	
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>						
3.1	<b>Protection of Watercourses:</b> (See 1.1): Azeravtoyol to ensure that the revised Tender Documents include all current provisions on protection of watercourses, and require the Contractor to set out a method statement for working in watercourses and protecting the water quality and stream flow, in the CESMP, to be approved by the Supervising Engineer.	Degradation of water quality in watercourses and downstream.	PR3: Resource Efficiency and Pollution Prevention and Control	<i>Responsibility:</i> Azeravtoyol to procure Consultant. Contractor to implement.  <i>Resources:</i> Azeravtoyol to cover	Consultant engaged prior to finalisation of Tender Documents.  Contractor to	Appropriate sections in revised Tender Documents.  CSEMP & Spoil Management Plan to be reviewed by Supervising	
3.2	<b>Spoil Management Plan:</b> The Tender Documents should require that the Contractor prepares a Spoil Management Plan which details the expected volumes and locations of	Soil, groundwater,	PR3: Resource Efficiency and				

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	spoil generation, planned locations and methods for storage and disposal, and mitigation methods and procedures to be followed. This should require borrow pits to be used to deposit spoil where possible, and should require all spoil deposit locations to be approved by the relevant authorities.	visual amenity	Pollution Prevention and Control	consultant costs.  Contractor to include costs for implementation in Tender Price.	implement during contract.	Engineer.  Monthly reports to Supervising Engineer. Annual AESR report to EBRD.	
3.3	<b>Location of Asphalt Plants:</b> Revised Tender Documents to include all current provisions on asphalt plants to be 500 m downwind from settlements, and that locations thereof are approved by the Ministry of Ecology & Natural Resources (MENR).	Air quality near receptors	PR3: Resource Efficiency and Pollution Prevention and Control				
<b>PR4 Health and Safety</b>							
4.1	<b>Occupational Health &amp; Safety Plan (OHS) During Construction:</b> Contractor will establish a Health and Safety Plan as part of an OHS management system in accordance with OHSAS 18001 or other international standard. The contractual conditions of the Contractor are to ensure that all sub-contractors are also required to follow the Contractor's Health & Safety Plan and the OHS management system.	Improved health and safety performance and a safe working environment for workforce.	PR4: Health & Safety	<i>Responsibility:</i> Contractor  Review by Supervised Engineer  <i>Resources:</i> Contractor – Designated OHS Manager	Plan must be approved by the Supervising Engineer before construction.  Implemented during the construction phase.	Documented Health & Safety Plan - ongoing health & Safety statistics and data.  Provide updates in AESR on implementation and statistics to EBRD.	
4.2	<b>Occupational Health &amp; Safety Plan During Operation:</b> Azeravtoyol (maintenance division) will establish a Health and Safety Plan as part of an OHS management system for the maintenance of the Project road in accordance with OHSAS 18001 or other international standard.	Improved health and safety performance and a safe working environment.	PR4: Health & Safety	<i>Responsibility:</i> Azeravtoyol  <i>Resources:</i> Azeravtoyol	Plan must be submitted to EBRD prior to operation of the road.  Implemented during the operation of the road.	Documented Health & Safety Plan - ongoing health & Safety statistics and data.  Provide updates in AESR on implementation and statistics to EBRD.	
4.3	<b>Road Safety Audit (RSA):</b> A Road Safety Audit in line with EU Directive 2008/906/EC (and relevant aspects of Azerbaijan standards) to be carried out by an independent appropriately certified auditor on the detailed design which should then be updated for the findings of the RSA. <i>(It is recommended this is be procured by Azeravtoyol as part of the consultant TOR under action 1.1).</i>  This RSA will also include a review of the following issues:  <ul style="list-style-type: none"> <li><b>Fencing at specific locations:</b> There are a few locations where bypasses will run around the back of communities or close to communities and may increase the risk of people directly crossing the new dual-carriageway at these locations. A</li> </ul>	Reduction of accident risks and improved road and community safety,	PR4: Health & Safety	<i>Responsibility:</i> Azeravtoyol to procure Consultant.  <i>Resources:</i> Azeravtoyol to cover consultant costs	Before finalisation of the detailed design for tendering and subsequent RSAs at key stages, as required under the EU Directive	Documented RSA.  Updated detailed design & Tender Documents.  Report in AESR to EBRD.	

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	<p>review of whether fencing should be implemented to reduce these risks will be carried out as part of the RSA.</p> <ul style="list-style-type: none"> <li>• <b>Lighting provision:</b> Lighting provision will be reviewed as part of the RSA.</li> <li>• <b>Additional measures to control excessive speeds:</b> The RSA will review whether additional safety measures at certain locations should be implemented to control excessive speeds.</li> <li>• <b>Signage provision of 60 km/hr speed through urban areas:</b> The RSA will identify which sections of the Project road would be defined as running through 'urban areas' and therefore the 60 km/hr urban area speed limit maximum would apply. The installation of '60' speed signs in these urban locations will also be reviewed as part of the RSA.</li> </ul> <p>Following the RSA there should be the mandatory inclusion of economically viable improvements into the design. Where the RSA recommendations are not implemented, the reasons why each recommendation has been declined needs to be confirmed to EBRD. A road safety inspection shall be carried out on the road once operational, and if appropriate action plans developed for low cost remedial road safety measures.</p>				2008/96/EC.		
4.4	<p><b>Traffic Management Plan (&amp; Community H&amp;S Measures in CESMP):</b> Contractor to include relevant Community Health &amp; Safety measures within the CESMP and the Traffic Management Plan (TMP). Haulage routes - avoiding communities as far as possible - should be considered in the TMP. Drivers should be trained in safe driving and the code of conduct. The TMP will need to consider phasing of the works to ensure local access is retained, including public transport. The management of mixed traffic during construction needs to be reinforced in the TMP especially due to the predominant agricultural land use in the area, including the potential management of livestock movements and peaks of agricultural machinery and need for frequent access during harvest times</p> <p>Contractor will be expected to monitor potential traffic and road safety risks (including accidents) within the 'Works' area as part of their Traffic Management Plan.</p>	Compliance with EBRD requirements on health & safety and to ensure health & safety, access and severance issues are minimised for the local communities and agricultural land users.	PR4: Health & Safety	<p><i>Responsibility:</i> Contractor</p> <p>Review by Supervised Engineer</p> <p><i>Resources:</i> Contractor – Designated OHS Manager</p>	TMP & CESMP must be submitted and approved by the Supervising Engineer before construction commences.	Documented TMP & CESMP - ongoing accident statistics and data.	Provide updates in AESR on implementation and statistics to EBRD.
4.5	<p><b>Measures to Exclude the Public from Entering the Works Site:</b> During the CESMP preparation and works planning Contractor will identify measures to discourage public access to the works site, especially at locations close to communities. This should consider the provision of temporary fencing at specific locations where the risk of public access may be increased (e.g. where bypasses run close to local communities etc.).</p>	Compliance with EBRD requirements on health & safety.	PR4: Health & Safety	<p><i>Responsibility:</i> Contractor</p> <p>Review by Supervised Engineer</p> <p><i>Resources:</i> Contractor – Designated OHS</p>	CESMP must be approved by the Supervising Engineer before construction.	Documented CESMP.	

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				Manager	Implemented during the construction phase.		
4.6	<p><b>Community Road Safety Awareness</b></p> <p>Azeravtoyol will, prior to opening of the Project road, arrange and deliver Community Road Safety Awareness raising activities to the local communities to discourage:</p> <ul style="list-style-type: none"> <li>• direct crossing of the Project road;</li> <li>• taking direct access onto the new road with agricultural/other vehicles/livestock.</li> </ul>	Compliance with EBRD requirements on health & safety.	PR4: Health & Safety	<p><i>Responsibility:</i> Azeravtoyol</p> <p><i>Resources:</i> Azeravtoyol</p>	During the construction period and prior to opening of Project road and/or project road sections.	<p>Programme of Community Road Safety Awareness activities defined and delivered.</p> <p>Provide updates in AESR to EBRD.</p>	
<b>PR5</b>	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	<p><b>Preparation &amp; Implementation of Resettlement Plan (RP)<sup>2</sup>:</b></p> <p>Complete the preparation and implementation of the Resettlement Plan in line with the Azerbaijan Expropriation Law (i.e. the 'Law on the Expropriation of Lands for State Needs' – No. 987 III-Q 2010) and EBRD's PR5. <i>(It is recommended that an international consultant is engaged to support Azeravtoyol LAD with the preparation of the RP – see 1.1).</i> The following points will be specifically addressed during the preparation of the Resettlement Plan:</p> <ul style="list-style-type: none"> <li>• Ensure entitlements of those with no legal rights for the land they live in are in line with the Expropriation Law (i.e. these affected persons are entitled to aid for resettlement and for compensation for damage to movable property (Art. 7.3.5)) and EBRD's PR5.</li> <li>• Entitlement for compensation for loss of documented (i.e. legal) and undocumented (i.e. with no legal documentation which may be illegal) should be reviewed and explicitly stated in the RP.</li> <li>• Targeted assistance for vulnerable affected persons.</li> <li>• The draft entitlement in the draft LARF/RAP for compensation for plots that are reduced to 'less than 400 m2 or rendered unusable by alterations in access, irrigation or workability will be included in affected land....' will be replaced with 'Should access to the divided small plots and irrigation possibilities be restricted, that land will be considered useless from an economic point of view and included in the affected land'. This amended entitlement will be reviewed in line with the relevant provisions in the Expropriation Law and PR5.</li> <li>• The cut-off date, which is the completion of the censuses, should be clearly recorded within the Resettlement Plan.</li> <li>• The RP will contain a clear description of the process for access to land and</li> </ul>	Compliance with EBRD and national requirements	PR5: Land Acquisition, Involuntary Resettlement & Economic Displacement	<p><i>Responsibility:</i> Azeravtoyol LAD</p> <p>(Azeravtoyol to procure Consultant to support the LAD).</p> <p><i>Resources:</i> Azeravtoyol</p>	Before construction starts.	<p>Submit RP to EBRD for review when prepared.</p> <p>Documented and implemented RP.</p> <p>Report progress in AESR to EBRD.</p>	

<sup>2</sup> It is advised that the Entitlements Matrix from the April 2014 draft RP for Ganja to Gazakh Dualisation is used as a base to develop the final RP once the findings from the census are available. The Entitlements Matrix within the draft Oct 2014 RP for the Ganja-Gazakh-Georgian Border Dualisation is missing key entitlements under the Azerbaijan Expropriation Law and EBRD's PR5.

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	<p>explicitly state displacement or access restrictions will <b>not</b> occur until all compensation has been provided and the notification process for access to land is completed (i.e. as stated in the provisions within the Expropriation Law).</p> <ul style="list-style-type: none"> <li>• Arrangements for temporary land acquisition by negotiation only by the Contractor for the works.</li> <li>• Review Resettlement Commission establishment per Rayon to ensure it meets the provisions of Art. 40 of the Expropriation Law regarding the inclusion of affected persons.</li> <li>• Land acquisition and resettlement monitoring provisions.</li> </ul>						
5.2	<p><b>Land Acquisition &amp; Resettlement (LAR) Consultation Materials:</b> Consultation materials, such as pamphlets and posters on the LAR process, the LAR grievance mechanism and a Guide to Land Acquisition &amp; Compensation etc. will be prepared by Azeravtoyol Land Acquisition Department (LAD) to support the consultation with affected persons. These should be available in Azerbaijani.</p>	Compliance with EBRD and national requirements	PR5: Land Acquisition, Involuntary Resettlement & Economic Displacement	<p><i>Responsibility:</i> Azeravtoyol LAD</p> <p><i>Resources:</i> Azeravtoyol</p>	For public meetings and consultation process on land acquisition and resettlement.	Consultation materials available and distributed within Rayons, Municipalities and to project affected persons.	
<b>PR6</b>	<b>Biodiversity and Living Natural Resources</b>						
6.1	<p><b>Borrow Management Plan:</b> See 1.1. Azeravtoyol to ensure that Tender Documents specify that the Contractor's Borrow Management Plan should include: location of proposed extraction sites, plan for access, dust management on access roads, stockpile locations and management, and plan for rehabilitation of sites.</p>	Degradation of water quality and river bed in watercourses.	PR6: Biodiversity Conservation and Sustainable Management of Living Resources	<p><i>Responsibility:</i> Contractor</p> <p><i>Resources:</i> Contractor to include costs in Bid Price.</p>	For approval before works begin.	Appropriate section in Tender Documents.  Borrow Management Plan approved by Supervising Engineer.	
<b>PR8</b>	<b>Cultural Heritage</b>						
8.1	<p><b>Provisions in Tender Documents:</b> The requirements on preservation of antiques in the draft Tender Documents – including Chance Finds Procedure - to be carried through into the revised Documents.</p>	Minimising risks to cultural heritage sites.	PR8: Cultural Heritage	<p><i>Responsibility:</i> Azeravtoyol to procure Consultant to update Tender Documents (see action 1.1). Contractor to implement.</p> <p><i>Resources:</i> Azeravtoyol to cover consultant costs. Contractor to include costs for implementation in</p>	Consultant engaged prior to finalisation of Tender Documents.	Appropriate section on heritage protection in revised Tender Documents	

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				Tender Price.			
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>						
10.1	<p><b>Stakeholder Engagement and Disclosure of Project Information:</b></p> <p>Implement Stakeholder Engagement Plan (SEP) and update as necessary. <i>(Recommended Azeravtoyol engage a consultant to support them with implementation of the pre-construction SEP actions – see item 1.1).</i> Azeravtoyol to ensure Contractor (&amp; as necessary the Supervising Engineer) are involved in engagement with stakeholders and implements the actions in the appropriate parts of the SEP.</p> <p><b>Pre-Construction SEP actions include (but are not limited to):</b></p> <ul style="list-style-type: none"> <li>• Disclose the combined EIA for the Project road between Ganja and the Georgian border, the Non-Technical Summary (NTS), SEP and this ESAP on Azeravtoyol's website, EBRD's website. Distribute these at a Rayon level and within the offices/meeting place of affected municipalities.</li> <li>• Consultation meetings will be held in the four Rayons in the Project area on Shamkir, Tovus, Agstafa and Gazakh prior to construction commencing.</li> <li>• Azeravtoyol should also consider holding a consultative meeting in Ganja of a similar nature given the proximity of the Project road to this Rayon.</li> <li>• Consultation meetings should use the NTS and include presentations on the: updated project design, various route options considered, and the final route chosen; updated project schedule; and locations of underpasses, overpasses, junctions and local service roads are proposed for local access.</li> <li>• All materials supplied to the public and to support the consultation should be in the Azerbaijani language.<sup>3</sup></li> </ul>	<p>Management of risks and impacts on affected communities &amp; other stakeholders.</p> <p>PR 10: Information Disclosure &amp; Stakeholder Engagement</p>	<p><i>Responsibility:</i> Azeravtoyol Contractor</p> <p><i>Resources:</i> Azeravtoyol Contractor <i>(Supervising Engineer as required)</i></p>	<p>Before construction phase and continue implementation during construction and operation.</p>	<p>Consultation undertaken, information disclosed and SEP updated as required.</p> <p>Report in AESR to EBRD.</p>		
10.2	<p><b>Grievance Redress Mechanism:</b> Azeravtoyol will disseminate information on the grievance redress mechanism. A pamphlet and poster will be prepared on the grievance mechanism as stipulated in the EIA (2014). Relevant clauses will be contained within the contract conditions for the Supervising Engineer and the Contractor regarding their roles in supporting Azeravtoyol with the grievance redress mechanism.</p>						

<sup>3</sup> Azeravtoyol will review whether Russian versions of certain information should be prepared in Russian – but this would only be done on a case by case basis.