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**SUSTAINABLE URBAN DEVELOPMENT
INVESTMENT PROGRAM
PROJECT 1: SUB-PROJECT 1 (ARTASHAT HIGHWAY SECTION)
COMPLIANCE REPORT**

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List of abbreviations

ADB	Asian Development Bank
AH	Affected household
AP	Affected person
DESC	Detailed Engineering and Construction Supervision Consultant
EA	Executing Agency
IA	Implementing Agency
IMA	Independent Monitoring Agency
LAR	Land acquisition and resettlement
LARF	Land acquisition and resettlement framework
LARP	Land acquisition and resettlement program
MFF	Multi Tranche Financial Facility
MOE	RA Ministry of Economy
PIU	Project Implementation Unit
PMIC	Program Management and Implementation Consultant
ADB SPS 2009	ADB Safeguard Policy Statement (2009)
YM	Municipality of Yerevan

1 INTRODUCTION

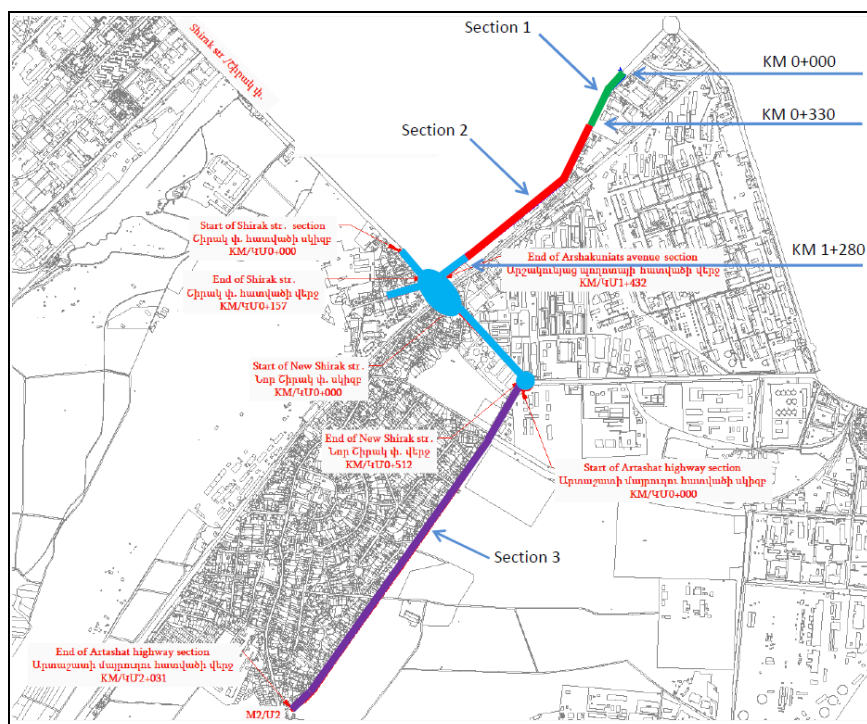
1.1 PROGRAM BACKGROUND

1. The Sustainable Urban Development Investment Program, (the Program), financed by Asian Development Bank (ADB) under Multi Tranche Financial Facility (MFF), is being implemented by the RA Ministry of Economy (MOE), as the Executing Agency (EA), and the Municipality of Yerevan (YM), as the Implementing Agency (IA) working directly through the Project Implementation Unit (PIU). The Program aims at promoting a sustainable, integrated, socially affordable and cost efficient urban transport system.

2. The Program requires substantial land acquisition and resettlement (LAR) with more than 200 affected persons (AP). This has been classified as Category A Project according to ADB guidelines. To facilitate the implementation of the LAR Plan (LARP) for entire Program, the total area was divided into three parts for which the following separate LARPs have been prepared:

1. LARP1 - Arshakuniats Avenue Section and Artashat Highway Section;
2. LARP 2 - Argavand Highway Section;
3. LARP 3 - New Shirak Street Section.

Picture 1 - Map of the LARP1 implementation area split into 3 sections



3. ADB approved LARP1 August 30, 2013 and the Government of Armenia (GoA) - on November 14, 2013. On February 25, 2014 the PIU applied to the ADB requesting approval for partial commencement of the construction works in section km 0+000-0+330 (hereinafter "Section 1") of Arshakunyats section where there are no LAR related issues. ADB gave its respective approval on February 27, 2014.

4. On May 19, 2014 the PIU requested the ADB's approval for splitting the LARP1 area into 3 sections:

- Section 1 - Arshakunyats Avenue section, km 0+000-0+330 (marked in green in the map);
- Section 2 - Arshakunyats Avenue section, km 0+330-1+28 (marked in red in the map);
- Section 3 - Artashat section, km 0+000-2+031 (marked in purple in the map).

5. IMA¹ completed the Compliance Review for the LARP 1 Arshakunyats Avenue Section on July 2, 2014, and civil works commenced in July 18, 2014. ***The current Compliance Review covers the LAR-related issues for the LARP1 Artashat Highway Section (or Section 3).***

1.2 OBJECTIVES OF THE COMPLIANCE REVIEW

1.2.1 External monitoring and evaluation

6. The Program LAR Framework (LARF) requires the Independent Monitoring Agency (IMA) to carry out the external monitoring in parallel with the implementation of LARPs. The IMA monitors and verifies LARP implementation to determine whether resettlement goals are achieved, livelihood and living standards are restored (and to what extent) and provide recommendation for improvement.

7. External monitoring entails two types of activities: a) short term-monitoring of LARPs implementation and compensation delivery and b) a long-term evaluation of the rehabilitation effects of the LARPs. The **short-term monitoring** or the compliance review of the LARPs' implementation will be carried out in parallel with the implementation of each LARP activity and will entail extensive field visits and communication with APs. The **long-term evaluation** will be carried out before and after the LARPs implementation to find out if the LARPs rehabilitation objectives have been attained or not, as well as for the assessment of the LARPs' implementation impact on the AHs.

1.2.2 Compliance review

8. The current compliance review is the second short-term monitoring task of the IMA; the compliance review of the Arshakunyats Avenue Section of the LARP1 has been completed in June 2014. Current compliance review addressed only the LARP1 Artashat Highway Section. The objective of the compliance review is to demonstrate that compensation activities have been carried out based on the provisions of the ADB Safeguard Policy Statement 2009 (SPS 2009), the Program LARF and LARP1. The review also identifies eventual complaints and grievances, the ways these were solved and the general satisfaction of the APs.

9. In total, 75 APs have been affected by the implementation of the LARP1 in Artashat Highway Section. 1 person appeared in the list of APs facing impacts and receiving compensation appears twice (ID120 and ID124). That is why, IMA personally contacted 74 APs. Out of those 74 APs 2 APs (ID 41 and ID 53) passed away in the course of LARP1 implementation, and their entitled property and rights passed to their successors. Meantime, according to the Armenian Legislation the process of inheriting takes a certain time (about 6 months). During the Compliance Review IMA addressed and interviewed well-informed household members of these 2 APs that are in process of heritage registration. In order to complete the LARP1 implementation before successors will pass through all official (long-lasting) procedures of heritage registration, the IA suggested an effective solution and agreed it with the ADB and Yerevan Municipality. Compensation for them has been completed by putting the money in a commercial bank in their

¹ Implementation of the Compliance Reviews for all 3 LARPs of the Program is delegated to AM Partners Consulting Company LLC, which operates as an Independent Monitoring Agency (IMA) for the Program

names, which will be available to official successors after the legal holding period is over in December 2014.

10. Implementation of the compliance review resulted in the current Compliance Report that documents the following:

- Compliance of the LARP implementation process to the LARP1, LARF, ADB SPS 2009, and the RA Law on Eminent Domain;
- Delivery of compensations and rehabilitation allowances to APs at unit rates applied in LARP1;
- Management of compensations disbursement schedules;
- Management of complaints and grievances, and other issues.

11. Approval of this Compliance Report by ADB will be the condition to start civil works at the LARP1 Artashat Highway Section.

1.3 METHODOLOGY OF THE COMPLIANCE REVIEW

1.3.1 Methods and activities

12. IMA applied the following methods during the compliance review:

- Revision and analysis of secondary materials;
- 2-stage contacting and interviewing of APs (snapshot contacts with all APs and Household Survey (HS) with 30% of selected APs), as it is specified/required by the ToR and the Contract of IMA;
- Complementary qualitative discussions with IA officers;
- Data classification, comparison, analysis, and compilation.

13. Respectively, the IMA conducted the following activities:

- Review and comparison of higher-level documents, such as the RA Law on Eminent Domain, ADB SPS 2009, Program LARF², and LARP1;
- Review and analysis of all APs' documentation packages collected and applied by the IA for each of them (74 packages in total)³, including the documents describing the impacts APs faced, valuation of acquired assets and calculation of compensations and allowances, contracts and agreements, APs' letters and complaints to the IA, etc.;
- IMA contacted all the APs by phone either for arrangement of an interview with them, or for a snapshot discussion of few topics related to the compensations' disbursement. Consequently, IMA surveyed 24 APs⁴ (32.4% of total) in a face-to-face format and with the application of a standardized questionnaire, and 73 APs⁵ have been interviewed by phone and personally (it became impossible to contact 1 AP after several tries).
- All the information collected via the review of secondary materials has been classified, cross-checked, compared, and analyzed.

14. Assessment of the compliance of the **LARP implementation** to the requirements of the LARP1, LARF, ADB SPS 2009, and the RA Law on Eminent Domain has been conducted via the

² The LARF and LARP1 have already been officially adopted as the RA Government Decrees

³ As it is mentioned in Para 9, 1 AP appears twice and has two IDs

⁴ According to IMA ToR and Contract

⁵ In case of 2 APs IMA interviewed family members of APs that passed away. Successors of initial APs were well informed about all the processes related to the alienation of their property.

review of the implementation process (processes, documents collected, compensation contracts/agreements conclusion, disbursement of compensations and allowances) and the requirements of normative documents mentioned. The review and assessment has been conducted by a specialized law firm⁶ attracted by IMA.

15. The analysis of compensations' provision based on two main procedures: a) segregation of the impact/compensation figures relative to the LARP1 Artashat Highway Section from the overall figures for the entire LARP1, and b) desk comparison of (segregated) planned and actual figures for the Artashat Highway Section on impact and corresponding compensation figures.

16. Desk analysis was then substantiated by **snapshot interviews** with 73 APs. Snapshot contacts were made via telephone calls and personal meetings for short discussion of the contracting and compensations' disbursement processes. Finally, IMA conducted a **satisfaction survey** (see the list of interviewed APs in [Appendix 7.1](#)) to collect further detailed information on APs' perceptions towards different aspects of the LARP1 (and Program) implementation. The survey used a specially designed questionnaire and addressed in detail the overall LAR process (duration, compensation payment modalities, grievances redress mechanism (GRM), respondents' satisfaction with specific aspects of LARP implementation, etc.), and the extent of the accomplishment of the objectives of the LARP1.

17. The analysis of Program documents, snapshot contacts, face-to-face interviews, direct observations on the area of LARP1 Artashat Highway Section, and intensive discussions with IA officers and APs were sources of information on LARP1 implementation modalities, eventual complaints and their resolution, timeliness of compensation and other relevant issues.

18. IMA reviewed and used/referred to the following documents during the compliance review:

1. ADB SPS 2009;
2. Involuntary Resettlement Safeguards: A Planning and Implementation Good Practice Sourcebook⁷, ADB, November 2012;
3. The Program LARF and LARP1 (covering the Arshakunyats Avenue and Artashat Highway Sections);
4. APs profile documentation packages, including the following documents:
 - a. Description Protocols of affected assets and other impacts;
 - b. Valuation Reports of affected assets and other impacts;
 - c. Acquisition/Compensation Contracts and Agreements and related/accompanying documents;
 - d. Other documents and datasets provided by the IA.

1.3.2 Surveys' methodology

19. IMA did not apply any sophisticated methodological tools for the implementation of snapshot contacts. All the contacted APs received the same questions and were open to respond as they liked.

⁶ Zohrabyan & Partners Law Firm LLC

⁷ See - <http://www.adb.org/documents/involuntary-resettlement-safeguards-planning-and-implementation-good-practice-sourcebook-d>

20. The survey of APs became one of the main tools for collecting (qualitative) information on compliance of the implementation with the requirements of the LARF and LARP1. This survey addressed overall LAR process (e.g. APs' awareness of LARP development and implementation process, disbursement of compensations, etc.), complaints and grievances, respondents' satisfaction with main aspects of the LARP1 implementation, etc.

21. For the implementation of the survey, IMA sampled 24 APs (representatives of households and businesses) of the LARP1 Artashat Highway Section. The sample included all the main types of APs (by the types of main impacts APs faced). IMA surveyed heads of households (with few exceptions) who formally present their households in relations with the IA. In a few cases (such as in case of the APs' death, or in case of APs being represented by others with the Power of Attorney) IMA interviewed other members of the APs' household/business or delegated persons. IMA specially designed a standard Questionnaire⁸ for the survey, which was discussed and agreed with the IA and ADB prior to the fieldwork.

⁸ The Questionnaire is presented in [Appendix 7.2](#)

2 ASSESSMENT OF THE COMPLIANCE

2.1 COMPLIANCE OF LARP IMPLEMENTATION TO HIGHER-LEVEL STRATEGIES⁹

2.1.1 Comparative review of legal acts

22. A snapshot review of the legislative framework identified some differences in approaches that LARF/LARP1 and the RA Legislation have towards LAR issues. A part of those differences are presented in the LARF and LARP1 in the form of comparative tables, but the issue requires further elaboration. Currently, the whole process is being regulated by a number of different documents and a lot of efforts have been invested to make them as compliant to each other as possible. However, comparative analysis of the ADB SPS (2009), Loan Agreement signed between the ADB and the RA (dated 19 May, 2011), RA Law on Alienation, the LARF and LARP1, etc., uncovers differences, some of which is presented below.

23. Point 10 of the RA Government Decree N 273-N of March 7¹⁰, 2012 on Land Acquisition and Resettlement Framework (LARF) for the Sustainable Urban Development Investment Program (SUDIP) specifies the following aspects: Eminent domain for which the property should be alienated; Acquirer of the alienated property; Details of the alienated property; Start and end dates of the alienation process. Article 7, part 2 of the RA Law on Alienation requires that the RA Government Decree should define the abovementioned four issues plus the entity that is responsible for the coordination of the alienation of the property, and other necessary information.

24. *Comparison of the above presented points of the LARF and the Law on Alienation uncovers some differences. In order to achieve full compliance of these two legal acts of higher importance, it would be better to insert a reference in the LARF to the Article 7, Part 2 of the RA Law on Alienation.*

25. Point F4, Sub-point 24 of the LARF (Conditions for Expropriation) specifies that *“Acquisition of land through expropriation proceedings entails lengthy procedures often may be resisted. Such an approach will thus be pursued under the Program only in extreme cases when negotiations between APs and IA fail and no alternative land is available to implement a subproject. In these cases, however, IA will not occupy the needed plots until: (i) the proper judicial process as defined by the law is initiated; (ii) a court injunction has been obtained and properly communicated to the APs; and (iii) the compensation/rehabilitation amounts are deposited in an escrow account”*. Article 13, Part 4 of the RA Law on Alienation defines that in case of expropriation the rights of the property owners are being stopped and rights for the alienated property of the acquirer start with the adoption of the court decision (including the court decision on additional compensations payable, if any, and disbursement of additional compensations). Additionally, if acquired property is a subject for state registration, rights of the acquirer start from the moment of such registration.

⁹ Under the higher-level strategies we mean the RA Law on Alienation, and respective subordinate normative acts adopted by the RA Government

¹⁰ Was applied since March 23, 2007

26. *The abovementioned Point of the LARF does not fully address the requirement for the State registration of the acquired land/property, since the rights for most of the acquired assets require State registration.*

27. Point 226 of the LARP1 defines: “The following process of compensation disbursement to the APs in accordance to Project LARF and Armenian Laws and Regulations is described below:

- **Sending of Draft Contracts:** As soon as LARP is approved by ADB and RA Government, IA will send the draft contracts to legal APs, including renters. APs should incorporate their bank account numbers in the draft contracts. IA should sign a final contract with AP within 3 months after dissemination of the draft contract.
- **Signing of the contracts and agreements:** PIU will sign contracts with APs for disbursement of compensation for legal properties through notary and will sign agreements without notary verification for disbursement of allowances.
- **Expropriation procedure:** If in the event of compensation dispute the final contract was not signed with AP within 3 months after dissemination of the draft contract, the amount of compensation will be pledged in the names of the APs on the court deposit account. AP has a right to take the amount from deposit account within 7 days. In this case, contract will be considered as signed. Otherwise, IA will initiate expropriation procedure and will transfer the case to the court. In such cases, no construction works on the particular plot will start until court decision is obtained and enters into force.
- **Payment of Compensation/Allowances:** The compensation amount will be paid within 15 days after contract signing and the 15% will be paid after the AP hands over the property according to a handing act. This is an additional compensation amount prescribed by the Law. The compensation will be transferred to the AP’s bank account.

28. Article 12, Part 1 of the RA Law on Alienation defines that if the acquisition contract is not signed within 3 months after it is sent to the owners and/or holders of any rights for the acquired property, the acquirer is obliged to deposit the compensation amount (not less than calculated before) with the notary or court within one month and properly inform the owners and/or holders of any rights of the alienated property within 3 days”. Article 12, Part 3 of the same Law defines that if the owners and holders of any rights for the property receive their deposited compensations before the court decision, the acquisition contract is considered to be concluded. Information/certification provided by the judge or notary on receipt of the deposited compensation amount becomes the bases for the alienation of the ownership. Thus, Article 12 of the RA Law on Alienation and LARP1 Para 226 regulate the issues related to the conclusion of acquisition contracts and expropriation.

29. Article 12 of the RA Law on Alienation clearly specifies the date of the conclusion of the acquisition contract, i.e. within 3 months after the notification of the APs (i.e. from the date of sending them the draft acquisition contracts). LARP1 specifies this date as within 3 months after the publication date of the draft acquisition contract. *The following contradictions are being observed:*

- *The Law does not define the term “publication date”, thus it is impossible to identify that date;*
- *In this regard, the LARP1 (as a subordinate legal act) should not use different definitions other than in the Law;*
- *In the LARP1, the date of depositing the compensation amounts with the notary or judge is also being counted based on the publication date of the draft acquisition contract, which creates the same contradiction with the so called “publication date”.*
- *LARP1 defines that the compensation amount should be deposited with the court only, while the Law defines the possibility of depositing the amount with the notary, too.*

- *The LARP1 specifies that APs can receive their amounts within 7 days after the depositing (and the contract will be considered signed as per law), while the Law gives time until the court decision.*

30. Article 10, Part 4 of the RA Law on alienation defines that property can be alienated based on the agreement concluded between the acquirer and the owner of (or holder of any rights for) the property. In this case, the amount of the compensation, disbursement form, way, and period, as well as responsibilities are being defined by mutual agreement of the parties. If the acquire is informed about any third parties that have any rights for the alienated property, those parties should become parties of the acquisition contracts, too. *Thus, in this article the Law specifies also the time of the disbursement of the compensation amount, while the LARP1 defines that time within 15 days after the conclusion of the acquisition contract.*

31. Snapshot review and analysis of the legal framework regulating the LAR processes under the SUDIP identifies a number of discrepancies. Most of them are not so serious in terms of APs' restoration, but they should be eliminated, anyhow. IMA recommends to initiate a separate process of the amendment and improvement of the applied legal framework with the purpose of ensuring harmonized and compliant regulation of all processes. It is suggested that the LARP and LARF documents in the Armenian language be revised by a special group of lawyers to ensure consistency with the RA legislation and legal terminology..

2.1.2 Compliance of the LARP1 implementation

32. Article 6, Part 6 of the RA Law on Alienation "Description Protocols of the alienated property are being properly sent to the owners of or holders of any rights for the alienated property within 3 days after their preparation, and the owners and holders of rights for the property are allowed to appeal to the authorized body or the court within 10 days after receiving the protocols". The same requirement is specified in the Point 147 of the LARP1. During the household survey some APs mentioned that they signed those protocols together with the acquisition contracts. *This would be a problem if the APs were right.* It would mean that requirement of the Law and the LARP1 were not met by the IA, since in both cases the APs were not able to appeal if they had any disagreement with the alienation process and sizes. But, the IA provided sufficient proof that all description protocols were sent to APs and have been signed prior to the conclusion of acquisition contracts. Thus, APs were able to appeal if they had disagreements. **IMA has no more concerns in this regard.**

33. Even snapshot comparative review of various legal acts that regulate the process of the implementation of the SUDIP identifies a number of different contradictions between them. Though minor at first sight, they complicate the implementation of LARPs, hinder processes, leave room for not identical and ambiguous judgments, etc. In specific cases various involved entities have to variate between the existing (initial) legislation and new normative acts introduced specifically for the SUDIP. Hereby, **IMA recommends to consider the possibility of conducting a comprehensive and deep comparative analysis of all the legal acts by specialized experts/entity that will result in specific and comprehensive recommendations for the amendment of the legislative framework of the SUDIP implementation.** Harmonization and approximation of local legislation and ADB requirements will ultimately result in clarification of many LAR-related issues, increase the effectiveness of the whole process, decrease and eliminate possible misunderstandings and tensions.

2.2 LARP IMPLEMENTATION PERIOD

34. The implementation of the LARP1 Artashat Highway Section started immediately after the approval was obtained through a Mayor's Decree N2458-A, adopted on June 25, 2014 having at hand the Valuation Reports and Description Protocols provided by DESC. The IA completed the implementation on October 30th, 2014¹¹. The IA implemented the LAR procedures and process based on the approach required by the LARP1, in general accordance with the Program LARF and ADB SPS 2009 requirements.

2.3 COMPLIANCE AND ACCURACY OF DOCUMENTATION PACKAGES

35. IMA verified the compliance and accuracy of documentation of the LARP1 Artashat Highway Section APs via direct observation and review of documentation packages of all 74 APs . During the verification process, IMA observed several typical **minor** shortcomings (such as small contradictions in description protocols, evaluation reports, and acquisition contracts; missing copies of APs' valid passports; missing Questionnaires; typos in official documents, etc.). Though those shortcomings did not affect the compensation amounts IMA recommended the IA to make respective corrections. **The IA followed IMAs' recommendations and resolved all the minor shortcomings to the maximum possible extent before the completion of the Compliance Review.**

36. IMA also reviewed the process of information/documentation collection process conducted by the IA (what formal papers have been collected, how, from where, etc.). IMA's recommendations in this regard are the following:

1. Simplify (to the maximum possible extent) the structure and design process of description protocols (but following the requirements of the legislative framework);
2. Detailed Measurement Surveys (DMS) implemented by the IA consultants ultimately result in a number of documents. One of them is the map of the alienated areas. For the future DMSs IMA suggests to prepare the maps in a way to show not only the alienated area (this refers mainly to illegal lands, since for entitled property those maps exist), but also the remaining part of the lands. This will make it easy to explain the APs what exact property is being alienated and what is left to them and in a later stage it will be much easier to monitor also the work of constructors. This issue was discussed and decided by the evaluation organization¹² at the Yerevan Municipality¹³, but IMA finds it useful to show the whole area and suggests to discuss the issue with the Yerevan Municipality once again.

2.4 SNAPSHOT CONTACTS WITH APs

37. IMA addressed the following themes and issues during snapshot contacts with APs:

1. Receipt of compensation amounts;

¹¹ The compensations of the last 2 deceased AP's were transferred to the bank accounts opened in the Armenian Development Bank CJSC on October 30th, 2014.

¹² Uptime LLC, DESC sub-contractor

¹³ Actually it was the decision of the Yerevan Municipality, though there are no official documents in this regard. It was a working decision, based on the assumption that provision of entire maps in the files of APs will create preconditions for APs towards legal entitlement of illegally used land. IMA does not see such risks: availability of entire map cannot provide sufficient bases for legalization of APs' rights towards the illegal lands.

2. Reasons of not receiving the compensation amounts;
3. Any costs related to the process of receiving the compensations and allowances;
4. Timing of receiving the compensations and allowances;
5. Any other problems related to the contracting and disbursements;
6. Any other general problems related to the acquisition of assets;

38. 72 APs out of 74 concluded acquisition contracts with the IA (personally or based on formal delegation confirmed by the Power of Attorney) as of October 15, 2014. 2 APs (ID 41 and ID 53) passed away and their families are in a process of formal inheritance of the APs' property. The IA did not conclude acquisition contracts with the APs and made the disbursement of compensation amounts on the bases of signed description protocols and the Decisions of the Yerevan Mayor N 6234-A made on December 9th, 2013 and N 2458-A made on June 25th, 2014. Compensation amounts have been disbursed to the APs' special bank accounts that were opened by the IA prior to death of these 2 APs. Their successors will be able to receive the compensation amounts from the bank after their entitlement is formally recognized. The IA discussed these 2 cases also with the ADB and received their approval for disbursement of compensation amounts, too.

39. The IA disbursed (and the APs received in their bank accounts) the amounts of compensations and allowances to all 72 APs (mentioned above) **within less than 5 calendar days after the conclusion of acquisition contracts**. Only 1 AP out of 72 APs that received their amounts cashed it out partially due to no need in total amount. All others cashed-out the whole amounts disbursed.

40. All the contacted APs attested that **no deductions from their amounts were made**, and no payments were charged by any of involved organizations and the bank. All the contacted APs had no complaints in regard of receiving their amounts though some of them cashed-out their amounts substantially after the disbursement.

41. **None of the contacted APs mentioned any other problems in regard to contracting, disbursement, and receipt of their compensations and allowances**. The only uncovered situation remained with the cases of APs that passed away. Their successors wait for the formalization of their rights for receiving compensation amounts, which are already deposited into their respective bank accounts.

42. On the other hand, some contacted APs had complaints in regard of other aspects of LAR implementation, such as, measurement of losses, valuation rates, etc. IMA analyzed all those complaints thoroughly via additional contacts with the APs, discussions with the IA, and evaluators. IMA collected all the complaints and grievances from APs and presented them in Chapter 4 of the current report.

2.5 COMPLIANCE OF THE COMPENSATIONS AND ALLOWANCES

43. The assessment of compliance is presented as **comparative analysis of the planned and actual post-implementation data** of LARP1 Artashat Highway Section. The IMA checked the compliance of the size/extent of impacts measured during the DMS and presented in the LARP1 before the implementation, with the size/extent compensated by IA during the implementation of the LARP1. Similarly, compensations and allowances planned and presented

in the LARP1 were compared with actual compensations and allowances disbursed during the LARP1 implementation¹⁴. This was done via comparison of the impacts specified in the compensation contracts/agreements with the LARP1 (and its Appendix 18). The abovementioned comparison of the pre-and post LARP-implementation data is presented in the table below.

2.5.1 Compensations and allowances paid

44. The DESC calculated and presented in the LARP1 the compensations and allowances against the various types of impacts (that APs faced) in accordance with the Entitlement Matrix¹⁵ and the IA applied¹⁶ respective rehabilitation measures (provision of compensations and allowances). Total amount of compensations and allowances paid to the APs and affected businesses within the rehabilitation measures framework implemented by the IA comprised **176,329,929 AMD**¹⁷. 72 APs received this rehabilitation amounts; the IA disbursed the amount of the last 2 APs that passed away but their successors are yet to be legally qualified to receive those amounts.

45. According to the information provided by the DESC the compensation budget (only the rehabilitation compensations and allowances paid to the APs from the proceeds of the ADB Loan and YM budget¹⁸) specified in the LARP1 for Artashat Highway Section comprised 189,043,143 AMD while actual compensation budget comprised 176,329,929 AMD. The aggregated difference of 12,713,214 AMD; IMA identified and analyzed the differences in detail¹⁹.

¹⁴ Some planned impacts and compensations may change during the implementation: mistakes may be identified, some alienation may be skipped and property may be saved, etc. IMA compares one-by-one all the description protocols, LARP1 figures, detailed impact sizes specified in the Appenndix 18 of the LARP1, impacts sizes specified in the contracts, and actual disbursement amounts. Any contradictions identified are being investigated and explained.

¹⁵ See Project Information Brochure Disclosed to APs, LARP1, Appendix 7

¹⁶ As suggested in the LARF that specified and harmonized the requirements of the ADB SPS 2009 requirements

¹⁷ See [Table 2](#)

¹⁸ I.e. funds allocated from the State Budget by the RA Government for the payment of various taxes, registration and other fees are not counted here

¹⁹ See [Table 3](#) and [Chapter 2.6](#)

Table 1 - Master table on LARP1 Artashat Highway Section implementation: Impact categories and volumes, acquisition and compensation amounts, AHs

N	Impacts categories	Measure unit	Whole LARP1				Artashat Highway Section (or Section 3), <i>planned</i>			
			Quantity	Amount evaluated, AMD	N of APs	N of APs w/o double counting	Quantity	Amount evaluated, AMD	N of APs	N of APs w/o double counting
1	Acquisition of <i>legally entitled own land</i>	m ²	690.87	21,088,906.37	3	3	90.00	4,147,373.00	1	1
2	Acquisition of <i>legally leased lands</i>	m ²	663.77	2,680,828.61	2	2	0.00	0.00	0	0
3	Acquisition of <i>illegally used lands</i>	m ²	28,422.96	60,200,148.77	98	96	23,193.12	31,406,786.96	75	71
4	Acquisition of <i>residential buildings</i>	m ²	460.94	94,553,000.16	3	0	0.00	0.00	0	0
5	Acquisition of <i>non-residential buildings</i>	m ²	1,545.00	242,679,458.00	16	5	167.19	16,666,358.46	6	1
6	Compensation for the impact on <i>renovations</i>	m ²	33.56	304,275.00	3	0	9.20	92,000.00	1	0
7	Acquisition of <i>fences, metal A</i>	m	906.13	2,598,293.82	35	0	45.74	202,274.00	15	0
8	Acquisition of <i>fences, metal B</i>	m	45.74	202,274.40			346.82	926,165.00		
9	Acquisition of <i>fences, wood</i>	m	44.37	165,883.20			44.37	165,883.00		
10	Acquisition of <i>fences, tuff (2 types)</i>	m ²	47.6	420,575.83			0.00	0.00		
11	Acquisition of <i>improvements</i>	m ²	4,329.64	20,169,520.00	15	0	2,998.58	8,969,630.00	9	0
12	Acquisition of <i>crops</i>	m ²	805	507,140.18	11	0	380.00	153,360.18	4	0
13	Acquisition of <i>seedlings (fruit trees)</i>	tree	820	1,000,500.00	90	0	761	919,500.00	40	0
14	Acquisition of <i>not-yet-productive (fruit) trees</i>	tree	240	1,524,053.00			206	1,289,811.00	31	0
15	Acquisition of <i>fruit-bearing trees</i>	tree	2,508	121,384,157.00			1,933.0	97,121,382.00	66	0
16	Acquisition of <i>wood trees</i>	tree	61	717,570.00	21	0	36	606,480.00	10	0
17	Acquisition of <i>decorative trees</i>	tree	168	432,800.00	20	0	71	125,800.00	9	0
18	Compensation for impact on <i>business, permanent</i>	case	5	3,195,797.60	5	1	3	1,196,400.00	3	0
19	Compensation for impact on <i>business, temporary</i>	case	6	8,950,693.34	6	0	6	422,586.67	7	0
20	Compensation for impact on <i>employment, perm.</i>	person	3	900,000.00	3	2	0	0.00	0	0
21	Compensation for impact on <i>employment, temp.</i>	person	7	701,760.00	7	6	3	300,000.00	3	2
22	Compensation for severe impact	AH	85	25,240,694.55	85	0	63	19,154,702.77	63	0
23	Compensation for vulnerability	AH	20	5,400,000.00	20	0	14	3,780,000.00	14	0
24	Compensation of relocation (allowances)	AH	3	810,000.00	3	0	0	0.00	0	0
25	Compensation for livelihood (allowances)	AH	3	135,000.00	3	0	0	0.00	0	0
26	Allowances for transportation costs (including structures)	trip	25	1,984,750.00	25	0	11	1,396,650.00	12	0
	Total			617,948,079.83		115		189,043,143.04		

Table 2 - Comparison of the LARP1 Artashat Highway Section planned and actual impacts and compensations

N	Impacts categories	Measure unit	Artashat Highway Section (Section 3), <i>planned</i>				Artashat Highway Section (Section 3), <i>actual</i>			
			Quantity	Amount evaluated, AMD	N of APs	N of APs w/o double counting	Quantity	Amount evaluated, AMD	N of APs	N of APs w/o double counting
1	Acquisition of <i>legally entitled own land</i>	m ²	90.00	4,147,373.00	1	1	90.00	4,147,373.00	1	1
2	Acquisition of <i>legally leased lands</i>	m ²	0.00	0.00	0	0	0.00	0.00	0	0
3	Acquisition of <i>illegally used lands</i>	m ²	23,193.12	31,406,786.96	75	73	21,538.19	28,254,087.42	71	71
4	Acquisition of <i>residential buildings</i>	m ²	0.00	0.00	0	0	0.00	0.00	0	0
5	Acquisition of <i>non-residential buildings</i>	m ²	167.19	16,666,358.46	6	1	93.00	13,239,330.00	4	1
6	Compensation for the impact on <i>renovations</i>	m ²	9.20	92,000.00	1	0	9.20	92,000.00	1	0
7	Acquisition of <i>fences, metal A</i>	m	45.74	202,274.00	15	0	45.74	202,274.00	15	0
8	Acquisition of <i>fences, metal B</i>	m	346.82	926,165.00			346.82	926,165.00		
9	Acquisition of <i>fences, wood</i>	m	44.37	165,883.00			44.37	165,883.00		
10	Acquisition of <i>fences, tuff (2 types)</i>	m ²	0.00	0.00			0.00	0.00		
11	Acquisition of <i>improvements</i>	m ²	2,998.58	8,969,630.00	9	0	1,353.69	5,163,493.00	6	0
12	Acquisition of <i>crops</i>	m ²	380.00	153,360.18	4	0	392.00	153,360.00	4	0
13	Acquisition of <i>seedlings (fruit trees)</i>	tree	761	919,500.00	40	0	761.00	919,500.00	40	0
14	Acquisition of <i>not-yet-productive (fruit) trees</i>	tree	206	1,289,811.00	31	0	170.00	1,277,356.00	31	0
15	Acquisition of <i>fruit-bearing trees</i>	tree	1,933.0	97,121,382.00	66	0	1,965.00	95,973,636.00	66	0
16	Acquisition of <i>wood trees</i>	tree	36	606,480.00	10	0	36	606,480.00	10	0
17	Acquisition of <i>decorative trees</i>	tree	71	125,800.00	9	0	71	125,800.00	9	0
18	Compensation for impact on <i>business, permanent</i>	case	3	1,196,400.00	3	0	1	116,400.00	1	0
19	Compensation for impact on <i>business, temporary</i>	case	6	422,586.67	7	0	5	422,587.00	5	0
20	Compensation for impact on <i>employment, perm.</i>	person	0	0.00	0	0	0	0.00	0	0
21	Compensation for impact on <i>employment, temp.</i>	person	3	300,000.00	3	2	3	300,000.00	3	2
22	Compensation for severe impact	AH	63	19,154,702.77	63	0	61	19,452,205.00	61	0
23	Compensation for vulnerability	AH	14	3,780,000.00	14	0	14	3,780,000.00	14	0
24	Compensation of relocation (allowances)	AH	0	0.00	0	0	0	0.00	0	0
25	Compensation for livelihood (allowances)	AH	0	0.00	0	0	0	0.00	0	0
26	Compensation for transportation costs (including structures)	trip	11	1,396,650.00	12	0	14	1,012,000.00	14	0
	Total*			189,043,143.04				176,329,929.42		

46. Differences identified during the comparison of actual and planned impact and compensations for the AHs and businesses of the LARP1 Artashat Highway Section are presented in the table below.

Table 3 - Differences identified (actual minus planned impact and compensations) in LARP1

N	Impacts categories	Measure unit	Difference in actual and planned impact and compensations			
			Quantity	Amount evaluated, AMD	N of AHs	N of AHs w/o double counting
1.	Acquisition of <i>illegally used lands</i>	m ²	-1,654.93	-3,152,699.54	4	3
2.	Acquisition of <i>non-residential buildings</i>	m ²	-74.19	-3,427,028.46	4	2
3.	Acquisition of <i>improvements</i>	m ²	-1,644.89	-3,806,137.00	4	3
4.	Acquisition of <i>crops</i>	m ²	12.00	-0.18	1	1
5.	Acquisition of <i>not-yet-productive trees</i>	tree	-36	-12,455.00	2	2
6.	Acquisition of <i>fruit-bearing trees</i>	tree	32	-1,147,746.00	4	4
7.	Compensation for <i>impact on business, permanent</i>	business	-2	-1,080,000.00	2	1
8.	Compensation for <i>impact on business, temporary</i>	business	-1	0.33	1	1
9.	Severe impact	AP	-2	297,502.23	2	2
10.	Transportation compensation	trip	4	-384,650.00	3	3
			Total	-12,713,213.62		

2.6 EXPLANATION OF DIFFERENCES IN ACTUAL AND PLANNED IMPACT

47. Three APs - ID 47/133, ID 104, and ID 91/96 that were initially involved in the list of LARP1 Artashat Highway Section, have been removed from the list of LARP1 APs²⁰ by the IA due to changing the location of the road junction. All the impacts and respective compensations for these APs have been counted and calculated in the LARP1, but IMA deducted both the impact volume and the compensation amounts. This legitimately created differences in planned and actual figures of the LARP1 Artashat Highway Section. Details of the differences identified are presented below.

²⁰ These APs may be returned under the LARP 2

Explanation box 1 - Explanation of the difference in acquisition of illegally used lands

Lands (1,655 m²) used by abovementioned APs (ID 47/133, ID 104, and ID 91/96) were excluded from the list of APs due to change of design. Respective compensation amount was deducted. A mistake in calculation of the compensation amount of 1 AP (ID 86) was identified and the AP returned the excessive amount to the IA.

Explanation box 2 - Explanation of the difference in acquisition of non-residential buildings

2 buildings belonging to 1 AP (ID47/133) and 2 buildings belonging to 1 AP (ID91/96) and the respective compensations were deducted.

Explanation box 3 - Explanation of the difference in acquisition of improvements

Filled-in land and concrete footpath of 1 AP (ID 47/133) was deducted. Concrete footpath of 1 AP (ID 91/96) was deducted. Asphalt area (85 m² - 765,000 AMD) of 1 AP (ID 56) (missed during the measurement and evaluation of the impacts) was added upon the AP's written/formal application to the IA. IMA recommended the IA to re-calculate this impact and compensate the AP for that.

Explanation box 4 - Explanation of the difference in acquisition of crops

Area of crops cultivated by 1 AP (ID 113) in the LARP1 is 380m², while actual compensation was made for 392m². However, in the Appendix 18 of the LARP1 the area is mentioned 392m². No changes in compensation amount.

Explanation box 5 - Explanation of the difference in acquisition of not-yet-productive trees

Number of not-yet-productive trees of 1 AP (ID 113) in the LARP1 is 68, while actual compensation was made for 25. Number of not-yet-productive trees of 1 AP (ID 60) in the LARP1 is 2, while actual compensation was made for 9.

Explanation box 6 - Explanation of the difference in acquisition of fruit-bearing trees

Number of fruit-bearing trees of 1 AP (ID 113) in the LARP1 is 64, while actual compensation was made for 107. Number of fruit-bearing trees of 1 AP (ID 60) in the LARP1 is 205, while actual compensation was made for 198. Fruit bearing trees of 2 APs (ID 104 and ID 91/96) (4 in total) were deducted.

Explanation box 7 - Explanation of the difference in compensation for impact on business (permanent)

2 businesses (sales of meat products) operated by 1 AP (ID 47/133) (without tax declaration) were excluded from the list of APs due to change of design.

Explanation box 8 - Explanation of the difference in compensation for impact on business (temporary)

Business (sales of meat products) operated by 1 AP (ID 91/96) (without tax declaration) was excluded from the list of APs due to change of design.

3 IMPLEMENTATION MODALITIES

3.1 REHABILITATION CONTRACTS CONCLUSION AND DISBURSEMENTS

48. The IMA conducted the assessment of the efficiency of the conclusion of acquisition contracts via reviewing of all contracts and agreements concluded between the IA and APs. The IA has concluded the majority of acquisition contracts and agreements in the period of July - September 2014. Conclusion of few contracts happened in October. Some contracts took more time to conclude due to necessity of ensuring necessary documents. Some APs spent long time to collect necessary documents, but it did not really influence LARP implementation process.

49. In almost all cases the IA disbursed compensations and allowances within a few working days after the conclusion of the acquisition contracts and agreements. In case of 1 AP (ID 116), the disbursement of the part of the compensation amount delayed for about 2 weeks due to a minor mistake in documents, which was ultimately resolved and the AP received the amount. According to the LARP1²¹, the conclusion of the acquisition contracts²² should be completed on January 21, 2014. Similarly, the payment of rehabilitation compensations and allowances should have been finished as of January 31, 2014. For the Artashat Highway Section the delay was substantial. The implementation of the LAR in this section started in the end of July, 2014 and lasted till the October 30th, 2014.

50. However, all APs of the LARP1 Artashat Highway Section (except of 3 APs whose properties were saved due to new design of the road junction - ID 47/133, ID 104, and ID 91/96) have received their compensation and allowance amounts. The IA and IMA did not receive any real complaint regarding the disbursement and receipt of compensations and allowances.

3.2 PUBLIC HEARINGS

51. The IA (with the support of the PMIC) organized Public Hearings with AHs and affected businesses of the Artashat Highway Section at Secondary School N75 in Nerkin Shengavit 12th street, on March 29, 2013. The stakeholders and implementers of the Program have been represented by the following experts:

1. Project Director, Deputy Head of the PIU,
2. Resettlement expert, technical specialist, institutional strengthening specialist, financial expert, and PR specialist of the IA;
3. 2 representatives of the DESC;
4. 2 representatives of the IMA;
5. Representative of the PMIC;
6. Other experts and consultants,
7. 56 APs from the LARP 1 Artashat Highway Section.

52. The agenda of the Public Hearing event consisted of the following issues:

- A. Presentation of the Program LARF to the participants;
- B. Presentation of the acquired assets valuation and the compensations'/allowances' calculation methodology;
- C. Questions and answers.

²¹ See the chapter 10.4 - Land Acquisition and Resettlement Plan 1 Implementation Schedule, page 82, LARP1

²² For the whole LARP1

53. All the APs were given a chance to ask questions and receive answers. Detailed minutes of the Public Hearing and information disclosure activities conducted are presented in [Appendix 7.3](#).

54. IMA can confirm proper organization and implementation of the Public Hearing Event. The IA and related consultants (DESC, PMIC) did their best explaining the LARP implementation process, providing information materials, answering the APs' questions, etc. The representation of APs was high, too. Meantime, contacts and interviews with the APs during the Compliance Review uncovered a need for more intensive communication. Actually, the only Public Hearing Event was held about 15 months before the start of the LARP implementation. **Organization of at least one more Public Hearings prior to the (or as a) start of the LARP implementation would be quite helpful in this regard. Most importantly, this will improve the APs' attitude towards the Project and increase the effectiveness of the LARP implementation.**

4 COMPLAINTS AND GRIEVANCES

4.1 GRIEVANCES

4.1.1 General complaint

55. **IMA observed some grievances and a number of complaints.** Some APs directed their formal (written) grievances to the IA and Yerevan Municipality. Others provided their complaints to IMA during the snapshot contacts and interviews. Importantly, most of complaining APs provided their complaints after the conclusion of acquisition contracts. Description of all cases of grievances and complaints, as well as their processing by the IA is presented below.

56. Almost all interviewed APs raised a serious complaint in regard to parallel activities conducted by the RA Government in the same area, but under a different Project. Exactly in the period of the implementation of the LARP1, other entities conducted quite large-scale earthworks on the lands of APs and extracted old metallic tubes from there. During these works they substantially damaged the assets (land, crops, trees, etc.) of the APs. APs linked those activities with the LARP1 (though there is no connection)²³ and started tensions with the organization implementing those activities, the IA, and even addressed IMA. The situation even worsened when the implementing organization did not properly provide information about their activities (such as for whom, why, how large, etc. the works have been implemented). If similar situations happen in future, the IA is recommended to contact with implementers of other initiatives with the request of stopping the activities for the period of LARP implementation, or at least put a sign describing what is done, why, for whom, etc. **It is strongly recommended to the IA and Yerevan Municipality to avoid parallel activities in the LARP implementation areas before full completion of all LAR-related activities. Such unplanned activities create negative attitude, distrust and tensions among APs towards the LAR process in particular, and the Program in general.**

4.1.2 Written (formal) grievances and complaints

57. The IA received the following formal (written) complaints, grievances from APs of the LARP1 Artashat Highway Section during the implementation of LAR activities.

ID	Grievance / Complaint	IMA recommendation and IA/DESC response
52	The impact on the improvements ²⁴ of the AP (85m ² asphalt) was not measured and compensated.	The IA initiated the measurement of the loss, amended the contract with the AP and disbursed the compensation in amount of 765,000. The AP has no more complaints.
94	The AP required to re-assess the valuation of fruit trees that were evaluated as not-yet-productive but were already fruit-bearing.	The IA explained to the AP that trees became fruit-bearing after the cut-off date, and no re-evaluation should be done. The AP has no more complaints.

²³ For quite a long time, only people working on SUDIP were visiting these people, making measurement, conducting surveys, talking to them about alienation, etc. It is natural, that APs translated the other "invasion" as another activity of the LARP1 implementers. In addition, those other people did not properly explained who and why does the excavation of old tubes and damages their lands and trees. Whoever did this, did not care at all about the impressions of APs, and about the influence they make on the LARP1 implementation process. This is unaffordable and Yerevan Municipality should take care for avoiding similar situations in future.

²⁴ Improvements were there before the cut-off date, and IMA recommended to re-calculate the impact size and compensation, which was further done by the IA.

-	Hamest Vardanyan requested her proportion of the compensation for the mulberry trees planted by her husband Rafik Arshakyan and commonly used with Razmik Arshakyan (AP ID - 67).	The IA included Hamest Vardanyan and Levon Arshakyan ²⁵ in the compensation list. Hamest Vardanyan has no more complaints.
84	<p>The AP complains that does not receive any compensation for the land and trees.</p> <p>The AP insists that compensation was provided for other land and he should receive the compensation also for the land acquired now. The AP decided to apply to the Yerevan Municipality and require confirmation documents on exact area for which he received compensation under the previous project²⁶.</p>	<p>The IA explains that this AP was involved in other (so called “Greenhouse”) Project implemented by Yerevan Municipality. In the frames of that project the AP received compensation for his land (3,000 m²).</p> <p>The IA officially responded to AP, but the response was not satisfactory for the latter. During the personal contact with the AP IMA required necessary documents confirming/justifying the request of the AP. No documents were provided. IMA explained to the AP that complaint can be resolved also in a court, if the AP will be able to provide necessary evidence attesting its’ position. IMA recommends no action to the IA in this case. If the AP opens a court case, the grievance will be redressed there.</p>

4.1.3 Complaints identified during the interviews

58. IMA also received a number of complaints regarding the LARP implementation activities during the snapshot contacts and interviews with the APs. All those complaints were forwarded to the IA for information and further consideration.

Table 4 - Complaints and requests of the LARP1 Artashat Highway Section APs

ID	Grievance / Complaint
45	The AP states that impact on land and compensation is measured/calculated less. Also, there will be an impact on a building that was not measured and compensated. AP insists that can prove this. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
48	The AP states that impact on trees and fence was measured less and compensation was not adequate. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
51	The AP states that impact on crops was measured in the very beginning, but later was not included in calculation of compensations. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
67	The AP states that impact on trees (3 plum trees and 10 dewberries) was measured in the very beginning, but later was not included in calculation of compensations. During the next visit the DESC accepted the mistake and promised to amend, but ultimately nothing was done. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
74	The AP got involved in the Families Vulnerability Evaluation System after the cut-off date. No allowance for that was calculated and disbursed. IMA finds it necessary to express its position regarding this case. The AP raised the issue after the signing the

²⁵ Levon Arshakyan is the brother of Razmik Arshakyan and Rafik Arshakyan. The latter (passed away) was the husband of Hamest. Actually, thr compensation for the tree was divided equally among families of 3 brothers. Everybody is satisfied and the issue is resolved.

²⁶ The land is illegal. The IA has documental evidence that this AP was compensated for that (illegal) land within the frames of other project of the YM (so called “Greenhouse Project”). The AP argues that it is not true but does not provide any justified counter-arguments or documental proof. Thus, IMA does not consider the APs’ complaint as relevant.

	description protocol and conclusion of acquisition contracts. If the AP raised it at the stage of the description protocol's preparation, or during the baseline survey conducted by IMA (essentially - before the conclusion of acquisition contract and disbursement/receipt of compensation), <i>IMA would recommend</i> a revision of the amount of allowance and disbursement of additional amount for vulnerable families (as it is stated in the LARF ²⁷). Thus, IMA's position is the following - <i>the AP cannot receive additional allowance since its application was submitted after the preparation of the description protocol and conclusion of acquisition contracts</i> ²⁸ .
75	The AP states that impact on improvements (basalt footpath) and respective compensation is measured / calculated less than in reality. AP insists that can prove this. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
77	The AP states that impact on a mulberry tree and on fence was not measured and compensated. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
85	The AP states that impact on land was measured less. The AP improved the area of at least 350m ² , but compensation was calculated only for 81m ² . However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments ²⁹ .
89	The AP states that impact on crops (greens, avel) was skipped, no compensation was provided. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
107	The AP states that another person was compensated for the land that was used by the AP, although the expenses on irrigation and other costs were made by the AP, but Rafik Kirakosyan's household was compensated for that. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments.
114	The AP states that on trees and crops was calculated less. Some trees are still there that were not counted. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments. ³⁰
135	AP received a compensation for transportation of metal structure in amount of 90,000 AMD. The AP states that this amount is sufficient for changing the place of the structure by crane. No transportation is considered. However, the AP signed the Description Protocol and the Acquisition Contract. The IA has no legal justification for amendments. Besides, IMA addressed the valuation company with this issue which provided sufficient explanation on the accuracy of calculated compensation amount. Valuation company assessed the market and calculated relevant compensation amount both for the rent of crane and a trailer for the transportation of the structure in the distance of 20 km.

59. Most of the complaints and grievances that IMA received from APs relate to their disagreement with the measurement of the impact on (illegally used) land, trees, and crops. **The majority of the complaints is not well-justified and base on APs' expectations instead of any formal proof. In the meantime, availability of so many complaints from the side of APs attests that information disclosure and communication with the APs from the side of implementing entities was not sufficient.** APs were not fully convinced in accuracy of the calculation of the impact, which left a room for further disagreement and complaints.

60. IMA faced the similar situation also during the Compliance Review of the LARP1 Arshakunyats Avenue Section. A number of APs complained on the size of impacts and IMA has

²⁷ See the LARF Section IV, Article 12

²⁸ The AP was vulnerable before the Project start and LARP implementation. They were registered in the FVES and got allowance after the DMS, but did not inform the IA, DESC or anybody else. They did not tell even during the signing of Description Protocol and Contract. Thus, the momentum was lost and they cannot receive additional allowance within the LARP1.

²⁹ No sufficient proof is presented. Importantly, APs avoid upscaling the issue on the level of court case, which indirectly means that they are not sure in accuracy of their claims.

³⁰ Actually, the AP tries to get compensation for the illegal use of the area (dumping of waste). To our opinion, there is no room for discussing any additional compensations in this case and the APs' complaint is irrelevant.

no formal proof for agreeing with or rejecting those complaints. IMA has no mandate and is not provided respective resources for technical checking/measurement of the impact on APs' property. Besides, **IMA needed clear definition of the grievance that should be accepted by IMA**. Most of complaints are presented verbally to IMA officers, during the interviews, which took place quite after the APs signed all the official documents, agreed formally with impacts and compensations and have been disbursed the calculated amounts. IMA wondered if the complaints expressed after all those actions and presented verbally should be considered as grievances and elaborated further.

61. The LARP1 and LARF do not specify this aspect of the GRM, and IMA had to direct the question to the ADB and refer to the RA Law on Alienation. Actually, both sources confirmed that APs are free to express their complaints and grievances in any format (written, verbal, or via a phone call), but it should be done officially and within a certain period after receiving description protocols and draft acquisition contracts. If these documents are signed (i.e. acquisition contracts are concluded) and compensations are paid, the complaints can no more be considered as official grievances, though complaining APs are free to open a court case any time.

62. Finally, IMA recommends the IA to **open/introduce a specially designed Grievance Journal**, where the specially assigned officer will enter the details of all grievances and complaints received from APs.

4.2 EXPROPRIATION

63. **No expropriation of any assets has been initiated** during the implementation of the LARP1 Artashat Highway Section.

5 SATISFACTION SURVEY

64. IMA carried out the household survey among 24 APs of the LARP1 Artashat Highway Section. The main objective of the survey was the assessment of the APs' satisfaction (and other aspects sourcing from that) with the implementation of the LAR activities.

5.1 APs' AWARENESS ON LAR PROCESSES

65. Major findings related to the awareness of APs on LAR processes, implementation and other issues are presented below. In the meantime, before passing to presentation of the results of the survey IMA finds it necessary to make a reservation. **Negative responses** provided by APs for the overwhelming majority of asked questions have no justification. Moreover, In almost all cases IMA has documental evidence provided by the IA that APs' responses are not accurate. This, particularly refers to receiving formal notifications, participating in information collection, receiving description protocols and draft acquisition contracts, etc. In most cases, APs simply do not remember the process and make subjective judgments and provide wrong answers. Thus, **IMA recommends the IA and ADB to review the APs' negative responses (especially related to official procedures of the LARP implementation with a reservation).**

Table 5 - APs' awareness on LAR activities (among 24 APs)

N	Awareness aspects	Yes	No	D/K or D/R ³¹
1.	APs were informed on LAR process sufficiently before and comprehensively	21	3	0
2.	APs received formal notification about the alienation	22	1 ³²	1
3.	APs received documents or materials describing the LAR process	19	3	2
4.	APs participated in Public Hearings	17	7	0
5.	Information collection was conducted at APs' household	23	1 ³³	0

66. 2 APs mentioned that they received formal notification about the acquisition of their property just on the moment of the conclusion of acquisition contract (though one of them found it "sufficiently before"). Another AP mentioned that no information collection was conducted in their household. Both statements seem to be somewhat redundant and possibly the respondents were not just well aware of the processes although they are the heads of households.

67. 5 APs out of 7 that did not participate in Public Hearing were not informed about the event. 2 APs did not have time to participate. It is obvious that implementation of only one Public Hearing in the period of 15 months is not at all sufficient. Communication and information disclosure to the APs might/must have been much more intensive.

68. 23 APs were asked to specify when the information collection was conducted at their household. The range of their answers is quite wide: 1-3 years ago. 10 APs were not able to specify exact period of information collection, at all.

³¹ D/K - don't know, D/R - don't remember

³² ID 56

³³ ID 69

Table 6 - APs' awareness on information collection types (among 23 APs)

N	Awareness aspects	Yes	No	D/K or D/R
1.	Socio-economic survey	23	0	0
2.	Assets' inventory	23	0	0
3.	Calculation of trees	21	2	0
4.	Measurement survey	23	0	0
	Of which ...			
a.	<i>Participated by APs or household member</i>	19	3	1
b.	<i>Not participated by APs or household member, not informed via call or letter</i>	1	3	0

69. Only 2 APs mentioned that they did not receive the description protocols of the acquired property. 19 APs out of the remaining 22 got the document before the conclusion of the acquisition contract, 1 AP - on the moment of the contract conclusion, and 2 APs did not remember when they received the document. 21 APs out of 22 (who received the description protocols of the acquired property) mentioned that they reviewed the protocols thoroughly. Only 15 APs out of 22 (who received the description protocols of the acquired property) mentioned that they agreed with the content of description protocols. The remaining 7 APs did not agree for various reasons, but 5 of them simply did nothing. The remaining 2 applied to the DESC and the IA in written and verbally. Finally, 21 APs out of 22 (who received the description protocols of the acquired property) confirmed that they accepted and signed description protocols; another AP did not remember whether he signed the document, or not.

70. 22 APs out of 24 confirmed that they received preliminary acquisition contracts. Of them, 20 APs had sufficiently long time (three to thirty days and even more) to review the preliminary document; 2 APs allocated just several minutes to read the document. However, 20 APs found the allocated time sufficient for the review of the preliminary contracts and agreements.

5.2 CONTRACTING, DISBURSEMENT AND RECEIPT OF COMPENSATIONS

71. Only 2 APs out of 24 did not receive their compensations and allowances at the time of the IMA survey. These 2 APs passed away and their successors were waiting for formal confirmation of their status to receive the compensation amounts. 22 APs out of 24 confirmed that the way of receiving compensations was convenient for them.

5.3 COMPLAINTS AND GRIEVANCES

72. 8 APs out of 24 mentioned that they have had different complaints and grievances. The statistics in regard of the number of APs dissatisfied with various stages of LAR activities is presented below:

Table 7 - APs' complaints and grievances (among 24 APs)

N	APs' complaints and grievances at the stages of...	Yes	No
1.	LARP preparation	2	6
2.	Stock-taking, measurement, survey	7	1
3.	Agreement/Contract conclusion	3	5
4.	Payment of compensations	3	5

73. Though quite a lot APs had complaints and grievances (as identified during the snapshot contacts and interviews conducted by IMA), only a few of them

undertook real actions. Thus, out of 8 complaining APs only 2 applied to the IA in a written form, 4 APs applied to the IA verbally. Only 1 AP applied to the Yerevan Municipality in written form and only 3 - verbally. None of complaining APs is satisfied with the responses they received from the IA and Yerevan Municipality; all of them mentioned that their problems were not resolved. Though understanding the roots of the APs' complaints and sometimes even sharing them, the IMA considers the complaints of APs to be invalid. If the APs had real complaints/grievances, they should have not signed the Description Protocols and Acquisition Contracts (and APs have been told about it during the Public Hearings). Signing them, APs officially confirmed that they have no complaints, which is a sufficient base for the IA for the completion/closing of the LARP implementation process.

74. The grievance redress mechanism specified in the LARP considered weekly meetings between the IA and APs at a certain place. Only 1 AP out of 8 visited the IA specialist in that place and presented its complaint. 2 APs stated that they visited the place but nobody from the IA was there³⁴. 4 APs did not know about this opportunity, and 1 AP found it useless to express its complaint before receiving the compensation.

75. Only 1 AP out of 8 having complaints and grievances (more or less) formalized its application and was invited to discuss the issue with the Deputy Mayor of Yerevan. Others restricted themselves with verbal complaints and discussions with the IA specialists. However, none of these APs succeeded; none of them achieved the solution of its problems and just gave up. **IMA finds it disturbing that APs are sure that their complaints will not be properly processed and at a certain moment simply stop their efforts in this direction.**

76. **IMA finds the GRM of the Program not fully effective.** In fact, APs having complaints and grievances should apply to the same State agency (Yerevan Municipality or the PIU), which (they think) caused the problem to them. Surely, APs may always open a court case, but this is the APs' least preferred method of grievances' redress and they usually avoid it even at cost of not complaining, at all. **IMA strongly recommends the EA and the ADB to re-assess the efficiency of the Program's GRM and significantly intensify the communication with the APs prior to the LARP implementation and disbursement of compensation amounts.** APs are largely not aware of the GRM and its operation. Additional consultations with the APs just before their notification would be quite efficient in terms of minimizing the further complaints.

5.4 SATISFACTION WITH LARP PREPARATION AND IMPLEMENTATION

77. Contacts and communication between the APs, IA and DESC (including the sub-contractor consultants) took place during the various stages of the LARP preparation and implementation. The following chapter aims at assessing the APs satisfaction with different aspects of that communication.

³⁴ For several weeks the IA lacked the resettlement specialist (APs could not meet anybody at agreed place), and it is possible that some APs could not meet with the IA specialist in that period. However, there is no effective way to check the statement of these APs.

Table 8 - APs' satisfaction with communication with DESC and IA (24 APs)

N	Entities	Very satisfied	Satisfied	Not so satisfied	Dissatisfied
1.	DESC	7	14	1	2
2.	IA	7	14	1	2

78. Though substantial part of interviewed APs in Artashat Highway Section had a number of comments and complaints on various

aspects of the LARP1 design and implementation, their general attitude towards the entities involved in LAR processes is rather positive. Only few (and the same) APs expressed dissatisfaction with general contacts and communication with the DESC and IA. In addition, those are APs that are not mainly satisfied with the amount of compensations; they are strongly dissatisfied either with the size of the measured impact, or with the evaluation results. This general dissatisfaction influences on their general attitude towards the implementing entities, replacing any positive perceptions they might have had.

79. As mentioned, quite a lot of APs are not satisfied with the results of the valuation of the impacted assets and the calculation of the compensation amounts. In turn, this dissatisfaction mainly spreads on and relates to the certain assets acquired, such as land (though most of it is being used by APs illegally), fences, fruit-bearing trees, etc. However, in the overwhelming majority of cases dissatisfied APs are subjective (which is legitimate) and have more expectations, having no objective bases and justification for that.

Table 9 - APs' satisfaction with valuation of acquired property and calculation of compensations (24 APs)

N	Property acquired	Very satisfied	Satisfied	Not so satisfied	Dissatisfied
1.	Business	0	2	1	2
2.	Employment	0	0	1	1
3.	Building	0	3	0	1
4.	Land	1	8	5 ³⁵	9
5.	Improvement	0	4	0	1
6.	Renovation	0	0	0	1
7.	Fence	0	5	2	2
8.	Crops	0	0	1	0
9.	Seedlings	1	8	1	0
10.	Not-yet-productive fruit trees	1	6	0	1
11.	Fruit-bearing trees	1	13	1	4
12.	Wood/decorative trees	1	3	0	1

80. Next issue assessed by the APs was the methodology of the calculation of compensations and allowances. IMA included this question in the scope of the satisfaction survey since the APs have been distributed an information booklet where the entitlement matrix is presented. APs had an opportunity to review the methodology of the calculation of compensations and express their opinions. APs provided their answers ranking the methodology of the calculation. **IMA skips the presentation of their responses, since further interviewing (and analysis of responses) identified that APs have no idea on the methodology and base their subjective judgments just on the amount of compensations. This finding attests and confirms the necessity for**

³⁵ Including 1 legally entitled land

intensification of communication with APs and better introduction of the LARP and implementation processes to them.

Table 10 - APs' satisfaction with other aspects of LARP implementation (24 APs)

N	Implementation aspects	Very satisfied	Satisfied	Not so satisfied	Dissatisfied	D/K
1.	Contracts conclusion process	18	2	0	3	1
2.	Compensations disbursement process	21	1	0	0	2
3.	Availability of GRM	5	5	2	3	9
4.	Application of GRM	2	6	1	2	13

81. APs are mostly satisfied with the processes of contracting and compensations' disbursement. Available dissatisfaction relates rather to the measurement of impact than to these processes. General dissatisfaction with the compensations affects these APs making them to be dissatisfied with the whole process of the LARP1 implementation. IMA is more anxious for the APs' assessment of the GRM and its application. APs' awareness on the GRM is very low; almost none of APs really understands how it operates and how they can use it. APs are just dissatisfied with the fact that their complaints were not resolved (in most cases), rather than with the efficiency of the GRM.

82. However, IMA collected some complaints directly related to the operations of GRM. The generalized complaint is the following: APs do not want to receive responses to their complaints and grievances from the very same people on whom they complain on. IMA provides respective recommendation on this issue further in the current report.

6 CONCLUSIONS AND RECOMMENDATIONS

6.1 ACHIEVEMENTS

83. The Compliance Review of the LARP1 Artashat Highway Section implementation identified the following main achievements:

1. The IA implemented the LAR procedures and process based on the approach suggested by the LARP1, in accordance with the ADB SPS 2009 and LARF requirements;
2. DESC succeeded to collect detailed and comprehensive information on APs' impacts in a punctual and quite accurate manner. All this data found its place in the LARP1. Identified differences of the impact and compensations are few in number, small in amount, and have clear explanations.
3. The IA implemented the rehabilitation contracting with the most of APs quite efficiently (fast), especially taking into consideration the sophisticated nature of the task and new approach to the land acquisition and resettlement suggested by the ADB SPS 2009. Efficient and flexible solutions have been found even for exceptional and complicated cases³⁶ that happened during the implementation of the LARP1 Artashat Highway Section.
4. The IA managed the process of paying compensations and allowances very efficiently. Payments have been made fast, without any unnecessary bureaucracy and delays. APs received their rehabilitation amounts promptly, and without any deductions.
5. No expropriation of assets has been initiated;
6. Most of APs are generally satisfied with all aspects of LARP1 implementation processes.
7. The IA followed the recommendations of the IMA regarding the shortcomings identified during the previous Compliance Review of the LARP1 Arshakunyats Avenue Section. In particular additional discussions were conducted with dissatisfied APs, the compensation amount against the acquisition of the fence of one of APs was recalculated, new official document was introduced certifying that APs had sufficient time for getting acquainted with the acquisition contract and have no complaints, etc. APs' complaints regarding the pushing from the side of the IA decreased drastically, which is another positive indication of the improvement of the quality of the IAs' operations.

6.2 IDENTIFIED SHORTCOMINGS

84. Compliance Review of the LARP1 (Artashat Highway Section) implementation identified the following shortcomings, which are minor in nature and do not undermine the basic soundness of the LARP1 implementation:

1. LARP 1 Artashat Highway APs raised a serious complaint in regard of parallel activities conducted by the RA Government in the same area, but under the different Project. Exactly in the period of the implementation of the LARP1, other entities conducted quite large scale earthworks on the lands of APs and extracted old metallic tubes from there damaging the assets of the APs.
2. In the course of the compliance review, few differences with the LARP1 have been registered that IMA identified during the verification and review of the LARP1 implementation information. Using the term "few differences" IMA means only those cases for which the calculated impact on APs and respective compensations were amended. In case of 3 initially identified APs the LAR processes have been skipped due to change in the Program design documents.

³⁶ 2 APs passed away and IA found effective way of contracting the successors and disbursing compensations

3. IMA collected quite a big number of complaints and grievances from APs during the snapshot contacts and interviews with them. About 15 APs are not satisfied with the results of the impact measurement though they ultimately signed the description protocols, certifications on having no complaints, and acquisition contracts. APs raise their complaints after implementation of all scheduled LAR activities, thus “securing” themselves from the risk of not receiving compensations for at least the measured impact. However, after receiving the entitled compensations the APs started complaining, including those to IMA.
4. Though the APs assessed the communication with the DESC and the IA to be quite positive, IMA finds the information disclosure and communication activities not fully sufficient. Only official remote communication with APs took place after conclusion of surveys by the DESC, except of one public hearing event conducted in March 2013. This only event is far not sufficient for explaining the APs all the nuances (or even general aspects) of the LAR processes, methodology of the calculation of the impact, respective compensations and allowances, GRM procedures, etc.
5. Revision of APs’ documentation packages identified minor shortcomings, such as absence of some documents, mistakes in a name and in calculations, etc. All those shortcomings have been presented to the IA and resolved promptly.
6. A number of APs are not satisfied with the evaluation of acquired assets. IMA skips those complaints due to lack/absence of any justified proof in this regard. Evaluation of acquired assets was conducted by a specialized sub-contractor of the DESC in full compliance with the Entitlement Matrix, LARP1, LARF and ADB SPS 2009 requirements.

6.3 RECOMMENDATIONS FOR FURTHER IMPROVEMENTS

85. Based on the conclusions presented above, IMA recommends the following corrective actions to the IA for improving the quality of the LARP1 (in Artashat Highway Section) and ensuring further enhancement for the implementation of next LARPs:

1. IMA **strongly** recommends to the EA and Yerevan Municipality to avoid parallel activities in the LARP implementation area before full completion of all LAR-related activities. Parallel activities may create negative attitude, distrust and tensions among APs towards the LAR process in particular, and the Program, in general.
2. The IA should be confident that APs are signing the acquisition contracts and accompanying documents with full comprehension of what they agree on. Sometimes APs do participate in surveys; receive notifications, sign description protocols and acquisition contracts without having full understanding on the responsibilities they undertake and property/rights they lose. Instead, they start rising complaints at later stages when the implementation of LAR activities is completed. For most of such cases, IMA finds the complaints subjective and unjustified. Nevertheless, in some cases the APs face such problems due to low awareness and generally low education level and lack of the experience in LAR issues.

This problem can be resolved via intensification of the communication between APs and implementing entities (especially the IA) prior to the start of the LARP implementation. Among the corrective measures IMA suggests to conduct additional public hearing events, one of which can be conducted exactly for the official notification of APs on the exact dates of acquisitions, contracting, and disbursements. During this event, the IA should introduce the applied approaches of the measurement of the impact and calculation of the compensations, APs’ rights (including the rejection of concluding acquisition contracts), operation of the GRM mechanism, etc.

3. IMA recommends the IA and ADB to consider the revision of the operation of the GRM within the Program. IMA finds the GRM to be effective just partially and almost not efficient. Current design of the GRM almost excludes the possibility of impartial review of grievances and solution of the problems that APs rise. In fact, all the complaints are being re-directed to the same entity, which created the dissatisfaction. The GRM should be functionally independent from the IA, operate in parallel on the same level of the IA and be provided with all necessary human, technical, and other resources.
4. IMA recommends the IA to open/introduce a specially designed Grievance Journal, where the specially assigned officer will enter the details of all grievances and complaints.
5. IMA recommends further formalization of the GRM operation. This, particularly, relate to formal clarification of the definition of the terms “grievance”, “complaint”, and “application”. Clear specifications are needed also for the ways and dates of submitting the grievances.
6. IMA recommends to consider the possibility of conducting a comprehensive and deep comparative analysis of all the legal acts by specialized experts/entity. This will result in specific and comprehensive recommendations for the amendment of the legislative framework of the SUDIP implementation.
7. IMA recommends to simplify (to the maximum possible extent) the structure and design process of description protocols (but following the requirements of the legislative framework);
8. For the future DMSs, IMA recommends to prepare the maps of alienated property of APs in a way to show not only the alienated area, but also the remaining part of the APs’ property.

86. **Wrap-up conclusion and recommendation**

Hereby, the IMA concludes that implementation of the LARP1 (in Artashat Highway Section) is sound with the RA regulatory and legislative framework, the LARF and the LARP1. As of the moment of the submission of the current Compliance Report no major issues are pending. IMA recommends to start the civil construction works.

7 APPENDICES

7.1 LIST OF PERSONS INTERVIEWED

Table 11 - Selection of AHs for the Household Survey

N	Respondents (AP IDs) ↓ Strata →	Residential buildings' loss (relocated)	Non- residential buildings' loss	Business loss		Land loss		Agricultural income loss	Employment loss		Vulnerable groups	Other (mixed) losses
				P	T	Legal	Illegal		P	T		
1.	120 and 124				x							
2.	64			x								
3.	41			x								
4.	57				x							
5.	120 (ii)									x		
6.	53		x									
7.	84		x									
8.	16					x						
9.	59										x	
10.	97										x	
11.	110										x	
12.	58										x	
13.	46										x	
14.	114						x					
15.	55						x					
16.	103						x					
17.	49						x					
18.	39						x					
19.	60							x				
20.	93							x				
21.	101							x				
22.	99							x				
23.	85											x
24.	77											x

7.2 SATISFACTION SURVEY QUESTIONNAIRE**Sustainable Urban Development Investment Program
LARP 1 - Artashat Highway Section****INDEPENDENT MONITORING AGENCY****Compliance Survey**

Dear Sir/Madam

The Republic of Armenia is conducting the reconstruction of 2 highways with the support of the Asian Development Bank. You should know that your household will be affected by the Program implementation. In order to mitigate the negative the negative impact and bring it to the minimum the Government of Armenia has developed and will implement a Land Acquisition and Resettlement Plan (LARP). The objective of the LARP is to ensure the social safeguards for all the affected households via provision of fair compensations against all types of losses. The implementation of the LARP will be monitored by the Independent Monitoring Agency (IMA). The specific tasks of the IMA are the ongoing monitoring of the LARP implementation process and evaluation of the impact of the LARP implementation on the livelihoods of affected households. The current survey, that you are asked to participate, targets to assess the compliance of the LARP implementation.

Questionnaire N _____

Date _____
d/m/y

i. Respondent's name

(Name / Surname)

ii. AH actual address

iii. Respondent's telephone

1. AWARENESS ON THE LARP DEVELOPMENT AND IMPLEMENTATION PROCESSES

1.1. To your opinion, were you informed on LAR process (i.e. that your property (or a part of it) will be acquired for the purposes of the reconstruction of the road) sufficiently before and comprehensively?

1. Yes	2. No	3. Don't know/remember
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1.2. Did you receive any formal notification (letter, note, etc.) about the acquisition of your property?

1. Yes	2. No	3. Don't know/remember
--------	-------	------------------------

1.3. Did you get any documents or materials describing the LAR process (such as during the previous surveys, public hearings, prior to the conclusion of the agreement, etc.)?

1. Yes	2. No	3. Don't know/remember
--------	-------	------------------------

1.4. Did you (or a member of your household) participate in Public Hearings (held in N75 Secondary School (12th street, Nerkin Shengavit) on March 29, 2013 or before)?

1. Yes → Q 2.6	2. No	3. Don't know/remember
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1.5. Why didn't you participate in Public Hearings?

1. Did not know about them	2. Have no time	3. Other response	4. Don't remember
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1.6. Was information collection conducted at your household?

1. Yes, (1.1When?) _____	2. No → Q 1.10	3. Don't know/remember → Q 1.10
--------------------------	----------------	---------------------------------

1.7. If yes, what type of information collection was conducted?

1. Property stock-taking	2. Calculation of trees	3. Measurement	4. Socio-economic survey	5. Other	6. Don't know/remember
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1.8. If stock-taking, calculation, or survey was conducted at your household - were you or a member of your household present there?

1. Yes → Q 1.10	2. No → Q 1.9	3. Don't know/remember → Q 1.10
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1.9. If no, were you were you informed about those works (by mail, phone call, or in other way)?

1. Yes	2. No	3. Don't know/remember
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1.10. Were you provided with Description Protocol of the acquired property?

1. Yes	2. No → Q 1.16	3. Don't know/remember → Q 1.16
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1.11. When did you receive the Description Protocol?

N	Period	Tick
1.	Before receiving the draft Agreement/Contract	
2.	Simultaneously with receiving the draft Agreement/Contract	
3.	After receiving the draft Agreement/Contract	
4.	While signing the draft Agreement/Contract	
5.	After signing the draft Agreement/Contract	
6.	Other (please, specify)	
7.	Don't know/ remember	

1.12. Were you able to review the content of the Description Protocol thoroughly?

1. Yes	2. No → Q 1.15	3. Don't know/remember → Q 1.15
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1.13. Did you agree with information provided in Description Protocol?

1. Yes → Q 1.15	2. No (2.1.Why?) _____	3. Don't know/remember → Q 1.15
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1.14. How did you express your disagreement with the information in the Description Protocol?

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1.15. Did you sign the Description Protocol?

1. Yes	2. No	3. Don't know/remember
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1.16. Did you receive the Draft Agreement/Contract?

1. Yes	2. No (2.1 Why?) _____ → Q 2.1	3. Don't know/remember → Q 2.1
--------	--------------------------------	--------------------------------

1.17. How much time did you have for reviewing the Draft Agreement/Contract before signing it?

1. _____ days	2. Don't know/remember
---------------	------------------------

1.18. Was that time sufficient for you to review the Draft Agreement/Contract?

1. Yes	2. No (2.1 Why?) _____	3. Don't know/remember
--------	------------------------	------------------------

2. IMPACT AND COMPENSATION

2.1. Did you receive the compensation amount specified in the Agreement/Contract?

1. Yes, completely	2. Yes, partially, 2.1 Why? _____	3. No, 3.1 Why? _____, → Q 3.1
--------------------	-----------------------------------	--------------------------------

2.2. Was that way of receiving the compensation convenient to you?

1. Yes	2. No	3. Other _____
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3. GRIEVANCE

3.1. Did you have any grievances/complaints?

1. Yes	2. No → 4.1
--------	-------------

3.2. At what stage did you have grievances/complaints?

1. LARP preparation	2. Stock-taking, measurement, survey	3. Agreement/Contract conclusion	4. Payment of compensations	5. Other
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3.3. Please tell what grievances/complaints you had?

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3.4. How did you tell/inform about your grievances/complaints?

1. Written application to the PIU	2. Orally, to PIU	3. Written application to the Yerevan Municipality	4. Orally to Yerevan Municipality	5. Other (specify)
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3.5. What was the response to your grievances/complaints?

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3.6. LARP GRM considers weekly meetings in the School (mentioned above)? Did you visit there?

1. Yes, visited and presented	2. Yes, visited, but nobody was there	3. No, knew but did not visit	4. No, did not know	5. Other
-------------------------------	---------------------------------------	-------------------------------	---------------------	----------

3.7. What did you do towards solution of your problem and redress of your grievances/complaints? (multiple responses are possible)

1. Did nothing, 1.1 Why _____	2. Resolved via consultations and negotiations	3. Opened a court case	4. Other
-------------------------------	--	------------------------	----------

3.8. To what extent was your grievances/complaints resolved?

The problem was solved			
1. Satisfied fully → Q 4.1	2. Satisfied partially → Q 3.9	3. Yes, but I am not satisfied → Q 3.9	4. No → Q 3.9

3.9. Why?

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4. SATISFACTION

4.1. To what extent are you satisfied with the LARP implementation process - interrogation with IA (PIU) and consultants?

	1. Very satisfied → Q 4.3	2. Satisfied → Q 4.3	3. Not so much satisfied	4. Not satisfied, at all
PIU				
Consultants				

4.2. If not so much satisfied or not satisfied, at all: Why?

--

4.3. To what extent are you satisfied with the LARP implementation process - appraisal/valuation of assets? (as per unit of appraised asset)

	1. Very satisfied → Q 4.5	2. Satisfied → Q 4.5	3. Not so much satisfied	4. Not satisfied, at all
Building, m ²				
Illegal land, m ²				
Improvement				
Other				

4.4. If not so much satisfied or not satisfied, at all: Why?

4.5. To what extent are you satisfied with the LARP implementation process - compensations' and allowances' calculation method?

	1. Very satisfied → Q 4.7	2. Satisfied → Q 4.7	3. Not so much satisfied	4. Not satisfied, at all
Building, m ²				
Illegal land, m ²				
Improvement				
Other				

4.6. If not so much satisfied or not satisfied, at all: Why?

4.7. To what extent are you satisfied with the LARP implementation process - conclusion of Agreements/Contracts?

1. Very satisfied → Q 4.9	2. Satisfied → Q 4.9	3. Not so much satisfied	4. Not satisfied, at all
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4.8. If not so much satisfied or not satisfied, at all: Why?

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4.9. To what extent are you satisfied with the LARP implementation process - disbursement of compensations and allowances?

1. Very satisfied → Q 4.11	2. Satisfied → Q 4.11	3. Not so much satisfied	4. Not satisfied, at all
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4.10. If not so much satisfied or not satisfied, at all: Why?

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4.11. To what extent are you satisfied with the LARP implementation process - grievance redress mechanism?

1. Not aware of → Q 4.13	2. Very satisfied → Q 4.13	3. Satisfied → Q 4.13	4. Not so much satisfied	5. Not satisfied, at all
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4.12. If not so much satisfied or not satisfied, at all: Why?

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4.13. To what extent are you satisfied with the LARP implementation process - grievance redress mechanism application?

1. Not aware of → Q 5.1	2. Very satisfied → Q 5.1	3. Satisfied → Q 5.1	4. Not so much satisfied	5. Not satisfied, at all
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4.14. If not so much satisfied or not satisfied, at all: Why?

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5. RECOMMENDATIONS

5.1. What recommendations do you have for further improvement of the LAR process?

LARP preparation: surveys, stock-taking, measurement
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Appraisal/valuation of the acquired property and calculation of compensations and allowances
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Conclusion of Agreements/Contracts

Disbursement of compensations and allowances
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7.3 PUBLIC HEARING AND INFORMATION DISCLOSURE

See the LARP1 Chapter 4 (Paras 119-127).