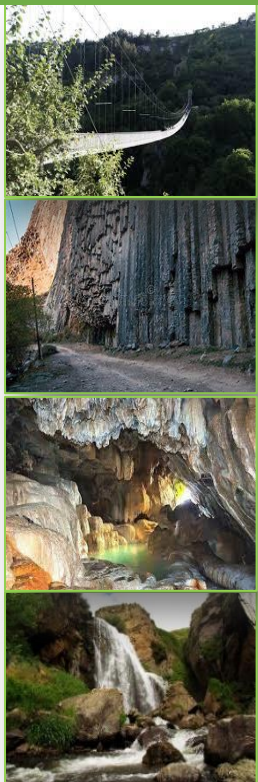# ARMENIA TOURISM AND REGIONAL INFRASTRUCTURE PROJECT

STAKEHOLDER ENGAGEMENT PLAN

ARMENIAN TERRITORIAL DEVELOPMENT FUND

ARMENIA TOURISM AND REGIONAL INFRASTRUCTURE PROJECT

[P504282]

STAKEHOLDER ENGAGEMENT PLAN

[FEBRUARY 14, 2025]

Contents

Acronyms

ATDF	Armenian Territorial Development Project
AUA	American University of Armenia
CDP	Cluster Development Plan
CERC	Contingent Emergency Response Component
CLO	Community Liaison Officer
CSO	Civil society organization
DMO	Destination management organization
EIA	Environmental Impact Assessment
EIEC	Environmental Impact Expertise Center
EPMIB	Environmental Protection and Mining Inspection Body
ESA	Environmental and Social Assessment
ESIA	Environmental and Social Impact Assessment
ESF	Environmental and Social Framework
ESHS	Environmental, Social, Health and Safety
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
EU	European Union
FGRM	Feedback and Grievance Redress Mechanism
GoA	Government of Armenia
GRC	Grievance Redress Committee
HLIB	Health and Labor Inspection Body
HMC	Hydrometeorology and Monitoring Center
H&S	Health and Safety
IA	Implementation Agency
ILCS	Integrated Living Conditions Survey
ILO	International Labor Organization
IPF	Investment Project Financing
LEIDP	Local Economy and Infrastructure Development Project
LMP	Labor Management Procedures
LWG	Local Working Group
MoE	Ministry of Economy
MP	Monitoring Plan
SME	Small and Medium Enterprises
MTAI	Ministry of Territorial Administration and Infrastructure
NGO	Non-governmental organization
OHS	Occupational Health and Safety
PEA	Project Execution Agency
PIA	Project Implementation Agency
POM	Project Operations Manual
PSC	Project Steering Committee
RA	Republic of Armenia
RPF	Resettlement Policy Framework
SEF	Stakeholder Engagement Framework
SEP	Stakeholder Engagement Plan
SNCO	State Non-Commercial Organization

SPHECMR	Service for the Protection of Historical Environment and Cultural museum-reservations
SRD	Sustainable Regional (Tourism) Development
TC	Tourism Committee
TRIP	Tourism and Regional Infrastructure Project
USAID	United States Agency for International Development
WB	World Bank
YSU	Yerevan State University

1. INTRODUCTION

Armenia Tourism and Regional Infrastructure Project (or hereafter "TRIP") will support activities and interventions for sustainable, inclusive, and climate and natural-disaster resilient tourism in seven prioritized clusters of **Areni, Dilijan, Dvin, Goris, Gyumri**, **Jermuk** and **Yeghegis**. The development objective of the Project is to improve access to sustainable, resilient and climate smart infrastructure services for increased tourism contribution to the local economy of project-supported clusters in Armenia. The main interventions would seek to address the key constraints to tourism development in each of the clusters, including a lack of basic and quality infrastructure and services, and a need to diversify the offerings and develop the respective main niches identified under the GoA cluster approach. The proposed Project will also follow-on and build on the investments, experience, and lessons learned under the ongoing Local Economy and Infrastructure Development Project (LEIDP).

This draft **Stakeholder Engagement Plan** (SEP) has been prepared to guide relevant stakeholder engagement activities both during the project preparation and implementation.

This draft SEP will be disclosed and open to feedback and consultation. The feedback from stakeholders will be incorporated into the final version of SEP.

1.1.   Project Description

1.1.1   Activities/Components

TRIP consists of four integrated components that will collectively contribute to improving the access to climate-resilient infrastructure for the benefit of local communities and visitors, enhancing the attractiveness of selected sites, enabling job creation, and increasing the contributions to the local economy from the tourism sector.

Component 1: Fostering Integrated and Sustainable Cluster Development will finance technical assistance (TA), consultancy services, goods and equipment, for, inter alia, the preparation of Cluster Development Plans (CDPs) and the associated analytical and technical studies to develop and implement the CDPs. The CDPs will help facilitate integrated and sustainable development and comprise the overall vision for the cluster over a 10-year planning horizon, including the detailed development plans covering the short, medium, and long term for capitalizing on each cluster's potential for tourism development and job creation. The CDPs will be approved by the Project Steering Committee (PSC)[1] and will serve as the guiding document for prioritizing interventions under the respective clusters, including their overall management, and operations and maintenance provisions. The following main technical assistance activities are envisioned under this component include:

(a) Development and finalization of CDPs for Dilijan, Dvin, Goris, Jermuk, and Yeghegis to be approved by the Project Steering Committee[2]. The CDPs will consider green, resilient, and inclusive development approaches and ensure coherence with existing regional and other municipal development plans. Demand assessments and economic analysis will be undertaken as part of the CDP development, and the priorities for cluster development will be selected through participatory approaches engaging with the local communities, businesses, and other stakeholders. The CDPs will be informed by Climate-Smart

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[1] The PSC is chaired by the Deputy Prime Minister and further described in "Section III. Project implementation."

[2] The CDP for Areni was developed under LEIDP, and the potential investments will be designed under TRIP once it is effective. For Gyumri, TRIP will utilize the existing strategies and development plans already developed, and a new CDP will not be developed.

Action Plans that identify low-carbon and adaptation investment options for the clusters[3]. The CDPs will also aim to maximize the employment potential of the clusters within the tourism and tourism-related sectors. Prioritized interventions from the CDPs will be undertaken under Component 2.

(b) Preparation of climate and disaster resilient zoning and master plans, investment planning studies, and other analytical work (e.g. feasibility studies) as required to inform preparation, development and finalization of CDPs.

(c) Public awareness campaigns and associated citizen engagement activities during and after preparation of CDPs to foster local ownership, inform future urban and spatial planning, and support decision-making.

(d) Development of site management and/or operational and maintenance plans for selected tourism assets and cultural heritage sites to support natural, cultural and social asset monitoring and preservation for long-term sustainable operations and management of the touristic assets.

(e) Conducting surveys and other tourism data acquisition activities for the collection of anonymized information and reporting of local tourism statistics through tourism stakeholders, such as the Tourism Committee, local Destination Management Offices (DMO)'s, and other tourism stakeholders.

(f) Support to the establishment and/or operations of DMOs in Areni, Dilijan, Yeghegis and Jermuk clusters through provision of trainings and capacity building, goods and equipment.

(g) Leadership training activities and promoting local participation of women to assume leadership roles in decision-making bodies within the tourism value chain, including through increased representation in Local Working Groups (LWG) under the Project[4] and supporting women with the necessary capacity building and skills enhancement.

Component 2: Supporting climate-resilient infrastructure and promoting private sector participation in local economies aims at closing the identified gaps across all seven clusters and tackling no-regret improvements to basic infrastructure, tourism and service delivery from the regional and tourism development perspectives across the seven project-supported priority clusters. Selection of the activities under this component will be informed by the CDPs developed and completed under component 1. The component will finance feasibility studies, engineering and technical site surveys, management and supervision consultant services, and other technical assessments, architectural and detailed engineering designs, and civil works. The component includes the following sub-components:

Subcomponent 2.1: Rehabilitating and upgrading infrastructure and services will finance consultant services and civil works for improving basic and tourism-relevant infrastructure, and urban upgrading to improve access to touristic sites and surrounding areas. All the infrastructure will be designed and implemented to withstand climate and disaster risks, including earthquakes, in accordance with Armenia's norms and building standards, and considering global best practice. The investments under the component will include, but are not limited to, the following activities[5]:

(a) Improving the quality and condition of roads and transport-related infrastructure, including promoting the adoption of green and eco-friendly alternative modes of transportation (e.g., public transport systems such as ropeways, electric buses, cycling, etc.). This activity will include construction, rehabilitation/improvement, and/or maintenance of roads and bridges, expansion of pedestrian zones,

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[3] See also Section IV: Project Appraisal Summary. Paris Alignment of the PAD.

[4] For more information on the LWGs, please see "Institutional and Implementation Arrangements" under Section III: Project Implementation.

[5] The potential list of interventions in each cluster and their readiness is provided in Annex 2.

streets caping and installation of light-emitting diode (LED) street lighting, and use of other green infrastructure elements for climate resilience and enhancing the attractiveness of streets, access roads, and parking areas. The investments will be designed in accordance with national standards and consider global best practices for disability inclusion as well as improving climate and disaster resilience (e.g., introducing flood mitigation and erosion control measures). The improvements will also include facilities for public transportation to improve access to the tourism facilities and the sites, parking, and pedestrian connectivity to encourage more non-motorized access to key attractions.

(b) Upgrading of basic infrastructure and services and rehabilitation of municipal infrastructure, including improving existing local water supply connections; rehabilitation and upgrading of sewerage systems, and wastewater collection and discharge systems; and improvements for proper storm water management. The sub-component will also seek to support the rehabilitation and/or upgrading of telecommunications infrastructure to improve digital access and connectivity of local communities and businesses.

(c) Enhancing the attractiveness of public areas and spaces, including rehabilitation and/or expansion of green spaces, public park upgrading, streetscaping, and the provision of related urban amenities for satisfactory touristic experiences.

(d) Provision of tourism-related infrastructure and services, including the construction or rehabilitation of tourism facilities, such as destination management offices and museums, and the preservation and improvement of cultural heritage assets. The rehabilitation of facilities will prioritize energy efficiency improvements, and all newly constructed buildings will adhere to energy efficiency standards at least equivalent to Excellence in Design for Greater Efficiencies Standards (EDGE-Level) 1. The designs will also include considerations for reducing waste, using low-carbon materials, and enhancing water use efficiency.

(e) Support for Public-Private investments (PPI), which includes the provision of complementary public infrastructure improvements to attract private investments. This activity would provide public infrastructure required to ensure the viability of commercial investments, such as new or rehabilitated adjacent public facilities, roads and streets, water and sanitation, and telecommunications[6]. Based on demonstrated interest and commitment by the private sector entities, this activity will aim to contribute to the enabling environment for wider economic development and crowding in of commercial investments. The specific procedures for identifying, selecting and processing of PPI investments will be elaborated in the POM.

Finalizing the CDPs is not a pre-requisite for initiating activities under component 2. While the CDPs are being prepared, the type of eligible sub-projects for component 2 is limited to investments that would be beneficial to the community and tourism development, regardless of the final outputs of the CDPs—i.e., 'no regret' investments. The potential no-regret investments are described included in Annex 2.

Subcomponent 2.2: Fostering private sector participation, enhancing professional skills, and enabling job creation (US$5 million) will finance consultant services for promotion of the clusters and increasing the participation of local firms and individuals in the tourism sector for local economic development. Proposed activities will include:

(a) Branding, marketing, and promotion activities within the tourism value chain.

(b) Promoting public private partnerships (PPPs), including the assessment, design, and preparation of potentially viable PPPs to be identified under the CDPs e.g., the need for long-term arrangements for

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[6] Proposal submission, selection procedures and criteria for approval will be specified in the Project Operations Manual.

operations and maintenance of tourism-related public transport systems (e.g., proposed ropeway system under consideration in Dilijan).

(c) Providing professional skills development in the HoReCa (Hotel, Restaurant, and Catering) sector for local workers involved in tourism and tourism-related businesses, with priority given to vulnerable and disadvantaged groups (e.g., women, youth and vulnerable groups who may lack the necessary skills, financial ability, and employment opportunities). This will also include the development and implementation of upskilling programs for a targeted number of tourism professionals.

(d) Providing on-the-job training (e.g. restaurant and culinary training) and formal learning (e.g. HoReCa certification programs) to be developed and implemented with selected partners active in the sector[7].

(e) Delivering trainings and other capacity building activities for local tourism firms and entrepreneurs that incorporate women's preferences, needs and design contributions through a participatory gender-inclusive process.

(f) Developing studies and analytical work to design, support implementation, and/or monitor activities for fostering the creation of job opportunities in the tourism sector across the clusters, including identifying potential interventions that could be supported through the Project.

(g) Development and/or promotion of digital tools, such as software applications for providing real-time information on transportation options, events, calendars of festivals, available amenities, hiking trails, and tour builders, for example.

Component 3: Program Management and Operational Support (US$4.5 million) will finance overall project management costs, including operational costs, consulting services, non-consulting services, vehicles, goods, communications, outreach, audits, and training. It will finance the costs of the project implementing agency to carry out project management functions and ensure all project activities meet the Bank requirements related to environmental, social, fiduciary, and technical standards, as well as a monitoring and evaluation consulting firm to support and augment the capacities of the implementing agency's existing internal M&E systems. The component will also seek to enhance capacities of the project implementing agency, the Armenian Territorial Development Fund (ATDF), through training and knowledge sharing activities.

Component 4: Contingent Emergency Response Component, CERC (zero allocation). This zero-dollar, ex-ante mechanism will allow for the rapid reallocation of uncommitted project funds towards urgent needs in the event of a disaster (geophysical, climate-related, or man-made), or public health emergency. Such events may include floods, earthquakes, droughts, wildfires, and disease outbreaks. An agreed trigger for the CERC would enable reallocation of the uncommitted project funds to support immediate response and recovery needs from other project components. The positive list of eligible activities will be specified in the CERC Manual, and disbursements would be made against a positive list of critical goods, civil works, and consulting services required to support the immediate response and recovery needs.

1.1.2 Implementing Agencies

The Ministry of Economy (MoE) will provide the overall decision making and strategic leadership of the Project. The Tourism Committee (TC), under the MoE, serves as the primary government agency with the mandate for tourism development and promotion in the country. In this capacity, the TC will play a critical

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[7] Please refer to "Project Description", subsection "E. Role of Partners" for further details on the proposed activities with partners for providing professional and skills training programs.

role of supporting the formulation and identification of investments under the project, and will be the main counterpart in the MoE responsible for coordination and policy support across the project.

The Armenian Territorial Development Fund (ATDF) will serve as the Project Implementing agency. ATDF will be responsible for the execution of all project activities and fiduciary responsibilities, including procurement and financial management, environment and social (E&S) monitoring, and all related responsibilities regarding technical assessment, design, and civil works, including works supervision, monitoring, and evaluation (M&E), and reporting.

1.1.3 Prior Stakeholder Engagement Activities during Project Preparation[8]

The TC conducted prior stakeholder engagement activities and consultation meetings during the project identification and preparation with the aim to select the clusters for the project. Consultation meetings were held in several regions (marzes) of Armenia with participation of representatives of municipality administrations, the local tourism sector, Destination Management Organizations (DMOs) and private sector (see photos from one of the consultation meetings in Annex 1). These consultations, alongside discussions with local authorities, community representatives, and technical experts, helped guide the selection of activities under each sub-component, ensuring that the proposed interventions align with the needs and priorities of the communities, and ensure complementarity with existing and planned interventions on the private sector side.

The selection of the 7 clusters was made based on the several criteria matrix that was developed together with the WB team. The list of criteria included:

a. tourism and regional development priorities of the Government,
b. accessibility from the main entry points to Armenia (land and air borders),
c. presence of a functional DMO to promote the proposed cluster sustainably,
d. opportunities for the private sector involvement,
e. capitalizing on the recently completed and ongoing tourism investments to increase synergies, including the investments under LEIDP,
f. economic viability and return on investments,
g. high potential for developing niche and sub-niche tourism offerings, to increase the diversification of Armenia's overall tourism offers.

This SEP builds on the engagement activities previously undertaken by the MoE, TC, ATDF, and Local Self-Governance Bodies (LSGB) in the frames of the LEID project. Such engagement activities included:

- Identifying and categorizing stakeholders;
- Conducting stakeholder mapping and analysis;
- Providing clear and timely information while improving communication flow;
- Ensuring transparency about actions being taken and how others can contribute;
- Listening to stakeholders and understanding their needs and interests;
- Offering opportunities for involvement that make efficient use of time and resources, allowing stakeholders to provide meaningful input.

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[8] This section will be further elaborated based on information provided by the TC

1.2. Objective and Scope of the Stakeholder Engagement Plan

The TRIP Project is being prepared under the World Bank's Environment and Social Framework (ESF). In line with Environmental and Social Standard 10 on Stakeholder Engagement and Information Disclosure (or hereafter ESS), the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project implementing agency will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The SEP covers the overall project activities, prioritizing those with potential environmental and social risks. However, entry points will be explored in the areas where development opportunities can be pursued through the project's resources.

Sub-project and/or site-specific level engagement will be integrated as part of the overall design and implementation of the activities concerned. Depending on the typology of the sub-project activities, the expected level of engagement, as well as the approaches and modalities may be defined into i) strategic engagement, awareness raising and public consultations to support cluster development plans and capacity building under technical assistance activities and ii) site-specific engagement for infrastructure investments both for rehabilitation and new construction.

Key areas where stakeholder engagement and outreach will be prioritized include:

a. Promoting integrated, sustainable, and inclusive local tourism development through engaging stakeholders in:

- The development of Cluster Development Plans (CDPs)
- Participatory preparation of cluster concepts outlining the tourism vision
- Refining/enhancing branding and promotion for target clusters
- Technical assessments and pre-feasibility studies
- Public-private engagement

b. Management of potential adverse impacts associated with the project's activities. Such impacts may result from:
- Land acquisition and resettlement; economic displacement and impact on businesses;
- Community health and safety;
- Reduced access to water, natural resources, ecosystem services;
- Urban development;
- Increased traffic and tourism flows, new traffic patterns;
- Impacts on cultural heritage;
- Other environmental, social and cultural heritage impacts.

c. Enhancement of potential development opportunities and social acceptance. The project may establish additional measures to enhance participation and access to benefits in terms of creating opportunities for women and vulnerable and marginalized groups, including but not limited to poor households, the elderly, and people with disabilities.

The above-mentioned objectives may be explored through meaningful stakeholder engagement which is a two-way communication with the focus on **consultation, collaboration and empowerment of stakeholders**. It includes:

- **Informing** - providing information with the use of bulletins, brochures, websites, social media, press releases, press conference;

- **Consulting** - gaining information and feedback for informed decisions with the use of surveys, focus groups, social media, online discussions, public meetings, forums, workshops, individual talks;

- **Collaborating** - working with stakeholders to understand their issues and concerns to jointly formulate responses with the use of forums, advisory panels, round table discussions, partnership;

- **Empowering** – delegating decision making on some issues to stakeholders through integration of stakeholders into governance structure as committee members (for instance in Grievance Redress Committee, Community Development Committee).

At the community level, stakeholder engagement can also be seen as a continuum of community involvement.

Figure 1 below, adopted from a diagram originally drawn by the International Association for Public Participation, and illustrates the levels of such a continuum.

| LEVELS OF COMMUNITY INVOLVEMENT				
Outreach *Some community involvement* Provide information to the community	**Consult** *More community involvement* Communication flows to the community and seeks feedback	**Involve** *Better community involvement* Communication flows both ways: participatory form of communication	**Collaborate** *Community involvement* Partnership with community on each aspect of the project from development to solution	**Share Responsibility** *Undertaking ownership and responsibility* Establishment of the sense of ownership

Figure 1 – Community Involvement Continuum

Based on the models discussed above, the project will adopt a tailored approach to stakeholder engagement that aligns with the needs and characteristics of each group. For vulnerable populations such as women, the elderly, persons with disabilities, displaced persons, and migrant workers, a more inclusive and participatory engagement model will be applied, ensuring their voices are heard and their needs addressed. For government entities, local authorities, and institutional stakeholders, a collaborative approach focusing on partnership and coordination would be most effective. This differentiated engagement strategy will help ensure that all groups are meaningfully involved in the project and that their contributions shape the project's outcomes.

1.3. Principles

To align with good practice approaches, the Project will apply the following principles for stakeholder engagement:

- **Openness and life-cycle approach**: Public consultations for the project/sub-projects will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.

- **Informed participation and feedback:** Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.

- **Inclusiveness and sensitivity:** Stakeholder identification is conducted to enhance communication and foster effective relationships. The participation process for the project is inclusive, encouraging all stakeholders to engage in consultations at every stage. Equal access to information is ensured for all stakeholders, with sensitivity to their needs guiding the selection of engagement methods. Special attention is given to vulnerable groups that may risk exclusion from project benefits, such as families living under poverty line, women, the elderly, and persons with disabilities, displaced persons, migrant workers, as well as consideration of the cultural sensitivities of diverse ethnic groups.

- **Flexibility:** cultural context (for example, particular gender dynamics), or governance factors (for example, high risk of retaliation) inhibits traditional forms of face-to-face engagement, the methodology should adapt to other forms of engagement, including various forms of internet- or phone-based communication.
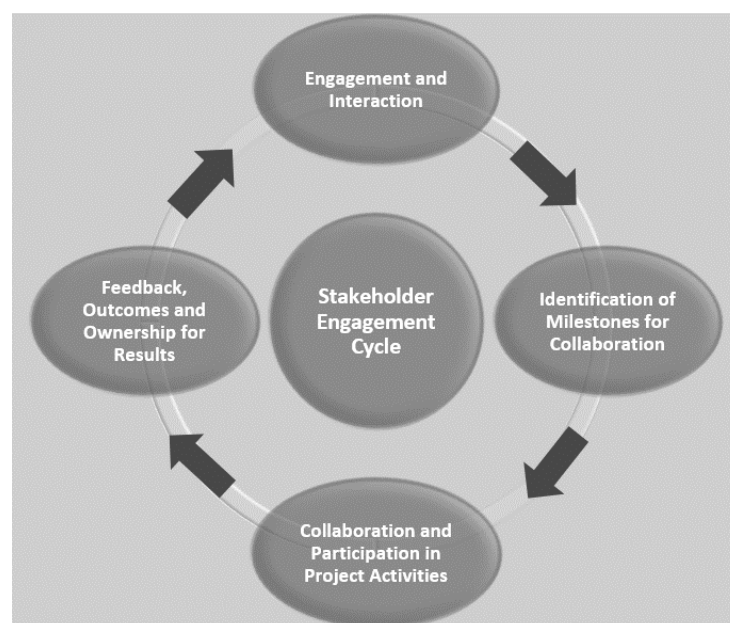
Figure 2 - Stakeholder Engagement Cycle

Figure 2 presents the stakeholder engagement cycle with its elements:

- Engagement and interaction with the stakeholders, initiation of a dialogue for collaboration;

- Identification of milestones for collaboration through a review of stakeholders' interests and needs finding cross-cutting sections of mutual interest for profound collaboration;

- Collaboration and participation in Project activities to have a chance to pursue their own interest, to satisfy their needs, to influence on decision making processes;

- The engagement in participatory processes will allow them to express their feedback, to share responsibility for outcomes and to undertake the ownership of the results.

Stakeholder engagement is a continuous cycle that begins anew after reaching its endpoint. This process involves recording achievements, gathering feedback, enhancing performance, updating objectives, and initiating the cycle again at a higher level. This approach includes identifying and engaging new stakeholders while maintaining collaboration with committed existing partners.

The SEP will be updated with specific engagement approaches where CDPs are developed and/or site-specific investments become known, where they are not known these will be elaborated in a revised SEP during implementation.

1.4. Limitations

Stakeholders are individuals or groups who have interest in or influence on the projects. The SEP aims to engage all stakeholders, or at least their respective groups, and to consider their needs and interests in the Project. However, managing stakeholder expectations and relationships can be challenging, especially when they have conflicting or competing interests, opinions, or demands.

Limitations to stakeholder engagement identified during the preparation stage may include the following:

a. CDPs development:

- **Exclusion of Affected Stakeholders:** Affected stakeholders may be excluded from the inclusive development process due to their absence from the community or failure to properly engage with them.
- **Reluctance to Participate:** Some stakeholders may be unwilling to engage in the preparation of regional and tourism cluster development concepts and investment plans, often stemming from a lack of understanding of the project's objectives and processes.

b. **Limited Skills and Experience:** Certain stakeholders may lack the necessary skills and experience to effectively participate in these activities. Site-specific investments:

- **Lack of a Systematic Approach:** There may be a non-systematic approach to stakeholder engagement, which hinders the identification of stakeholders and the development and maintenance of constructive relationships, particularly with project-affected parties.
- **Inadequate Assessment of Stakeholder Interest:** A failure to assess the level of stakeholder interest and support for the project can prevent their views from being considered in project design and environmental and social performance.
- **Incompetence or Indifference:** There may be a lack of competence or indifference in promoting and facilitating effective and inclusive engagement with project-affected parties throughout the project life cycle. This includes not providing timely, understandable, accessible, and appropriately formatted information on project activities including environmental and social risks and impacts.

To address above-mentioned limitations in stakeholder engagement, the Project will follow a clear process for identifying and building relationships with stakeholders, particularly vulnerable and marginalized groups, as described in this SEP.

Local working groups (LWG) will be formally established through the issuance of a Ministerial Decree by the Ministry of Economy, at the community level by the municipality heads prior to project effectiveness. The composition, roles, responsibilities, and overall functions of the LWG will be specified in the POM.

The LWG will comprise local representatives, including heads of communities, representatives from the municipality, representatives of local NGOs, nominated active residents and the private sector. The LWG will be engaged throughout the preparation of the CDPs under Component 1 as a consultative group to advise and guide the development of the CDPs, prioritize the interventions, and increase local ownership of the final CDPs developed. The LWG will also serve as the focal point for local communities to provide feedback or voice concerns regarding the preparation, technical design, and implementation of civil works under Component 2, as well as issues related to work quality in collaboration with ATDF, contractors, and other stakeholders. Additionally, the LWG will be responsible for regularly informing the community about the progress of activities within the clusters and managing grievances at the local level.

Stakeholder interests will be regularly assessed through focus groups, consultations and other methods, ensuring that proposed SE activities are targeted and adequate to the stakeholder needs and perspectives. Both project staff and stakeholders will be provided with training and workshop for effective engagement upon need. Project information regarding environmental and social risks will be properly disclosed in a timely and accessible manner, using various formats to reach diverse audiences. Established grievance redress mechanism will facilitate two-way communication, while collaboration with local self-governmental bodies and organizations will help bridge gaps in understanding and trust. Engagement strategies will be periodically assessed to allow for continuous improvement and responsiveness to stakeholder needs. Table 1 presents the proposed measures to address the SE limitations and challenges.

Table 1. Proposed Measures to Address SE Limitations

SE Limitations and Challenges	Reasons for Limitations	Means to Address Limitations	Responsible Parties
CDPs Development			
Exclusion of Affected Stakeholders	Absence from the community or failure to properly engage with them	▪ Project launch meetings will be held in all target regions to inform the communities on the Project and its components to initiate collaboration; ▪ Round table discussions may follow to engage the key stakeholders in the dialogue and to receive their feedback; ▪ Information about the preparation of the CDPs will be posted on the social media pages of the affected communities, enabling a wider range of community members and NGOs to get involved. This will encourage interested stakeholders to participate in the CDP preparation process at any stage, including during the draft CDP disclosure period.	TC, ATDF, Regional Administrations, LWGs, communities

Reluctance to Participate	▪ Unwillingness to engage in the preparation of regional and tourism cluster development concepts and investment plans, ▪ Lack of understanding of the project's objectives and processes.	▪ Brochures or leaflets with the project key information will be prepared and disseminated in the target communities; ▪ A local liaison officer will be hired for each cluster to support the ATDF to ensure proper participation of the vulnerable groups in the public consultation and other group meetings.	ATDF, local liaison officers
Limited Skills and Experience	Lack the necessary skills and experience to effectively participate in CDPs preparation activities.	▪ Focus group discussions will be held targeting women, the youth and people with disabilities if needed; ▪ Discussions on social media platforms will be initiated to generate opinions ▪ Capacity-building workshops and training sessions will be organized to enhance the knowledge and skills of community members, ensuring meaningful participation	ATDF, local liaison officers, local authorities
Site-Specific Investments			
Lack of a Systematic Approach	It can hinder the identification of stakeholders and the development and maintenance of constructive relationships, particularly with project-affected parties.	The systematic approach for SE will be applied in all target regions to identify stakeholders and develop constructive relations with them including: ▪ Project launch meetings in all target regions; ▪ Round table discussions; ▪ Information about the Project will be available on social media pages of target communities; ▪ Brochures or leaflets with the project key information will be prepared and disseminated in the target communities; ▪ A local liaison officer will be hired for each cluster to support the ATDF in relations with stakeholders.	ATDF, local liaison officers, local authorities, LWGs, consultants, contractors

Inadequate Assessment of Stakeholder Interest	A failure to assess the level of stakeholder interest and support for the project can prevent their views from being considered in project design and environmental and social performance.	▪Stakeholder interest level will be periodically assessed through:
		   ▪ Public consultation meetings;
		   ▪ Focus group discussions in target communities;
		   ▪ Discussion forums on social media platforms will be initiated to generate opinions.
		▪ Relevance of SEP actions will be periodically assessed and updated
			ATDF, local liaison officers, local authorities, LWGs, consultants, contractors

Incompetence or Indifference	There may be a lack of competence or indifference in promoting and facilitating effective and inclusive engagement with project-affected parties throughout the project life cycle.	Information on project activities including environmental and social risks and impacts will be provided to stakeholders in timely, understandable, accessible, and appropriate way through: ▪ Disclosure of ESMF, RF, SEP; ▪ Development and dissemination of brochures or leaflets with the project key information; ▪ Qualitative interviews and focus group discussions, meaningful consultations; ▪ Disclosure of ESMPs, RPs, if any, LMP before the commencement of civil works; ▪ Notification of communities on the start of the civil works	ATDF, local liaison officers, local authorities, LWGs, consultants, contractors
Lack of access or transportation	Living in remote areas, age or disabilities	▪ Ensure the dissemination of key project messages through multiple channels, including social media, web pages, banners, leaflets, word of mouth. ▪ Deployment of local liaison officer to reach out remote communities or beneficiaries in person or by phone.	ATDF, local liaison officers, local authorities, LWGs, consultants, contractors

2. STAKEHOLDER IDENTIFICATION AND ANALYSIS

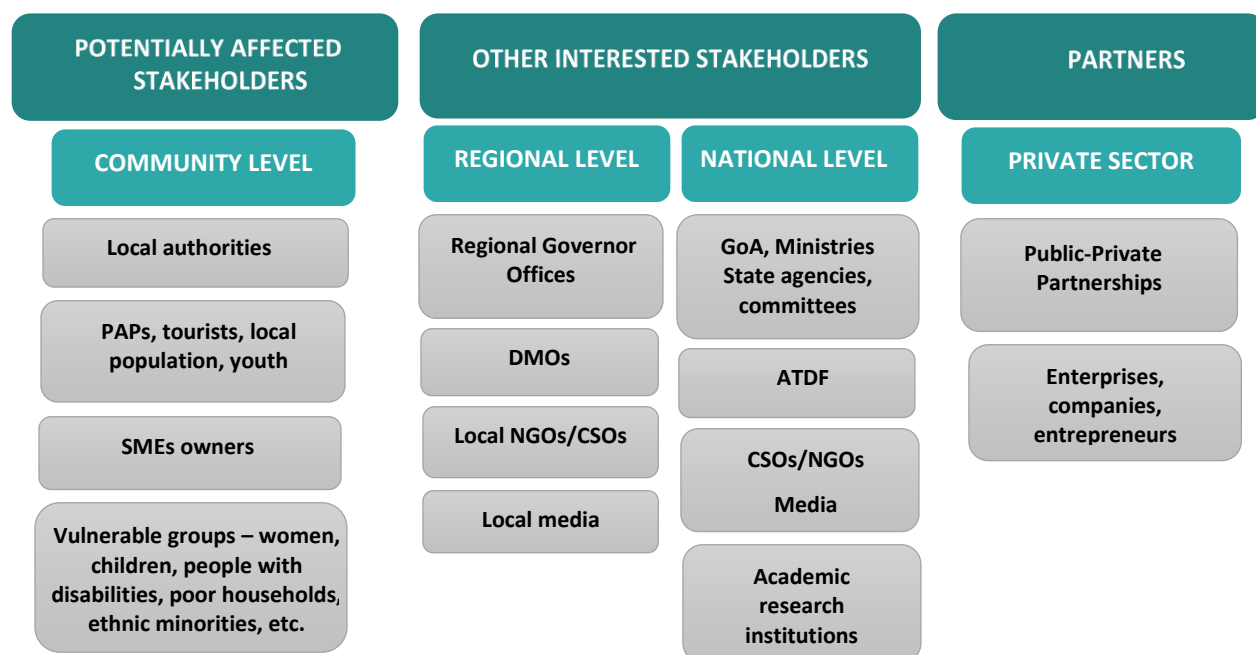## 2.1. Key definitions and main stakeholder groups

Project stakeholders are defined as individuals, formal or informal groups and organizations, and/or governmental entities whose interests or rights will be affected, directly or indirectly, by the Project, both positively and negatively, who may have an interest in Project implementation, and who have the potential to influence the Project outcomes in any way.

As per the World Bank's Environmental and Social Framework, Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, stakeholders may be categorized into:

- **Affected Parties** – stakeholders that are affected or may be affected by the Project;
- **Other Interested Parties** – other parties who may have an interest in the Project.

As a special category of stakeholders, the SEP also identifies **Disadvantaged or Vulnerable Groups,** i.e., individuals or groups who may be more likely to be adversely affected by the project impacts and/or may require special engagement efforts due to their vulnerable status[9] to ensure their equal representation in the consultation and decision-making process associated with the Project. Efforts will be made to identify vulnerable, disadvantaged, or marginalized groups and identify their specific needs.

Based on this categorization, the SEP outlines appropriate engagement mechanisms, their tentative timelines, roles and responsibilities for their implementation, and resources allocated for implementing the SEP activities. Stakeholder engagement mechanisms will be tailored to the needs of vulnerable groups as identified in the SEP.

POTENTIALLY AFFECTED STAKEHOLDERS	OTHER INTERESTED STAKEHOLDERS		PARTNERS
COMMUNITY LEVEL	**REGIONAL LEVEL**	**NATIONAL LEVEL**	**PRIVATE SECTOR**
Local authorities	Regional Governor Offices	GoA, Ministries State agencies, committees	Public-Private Partnerships
PAPs, tourists, local population, youth	DMOs	ATDF	Enterprises, companies, entrepreneurs
SMEs owners	Local NGOs/CSOs	CSOs/NGOs Media	
Vulnerable groups – women, children, people with disabilities, poor households, ethnic minorities, etc.	Local media	Academic research institutions	

Figure 3 – Partners, potentially affected and other interested parties

[9] Vulnerable status may stem from an individual's or group's race, national, ethnic or social origin, color, gender, language, religion, political or other opinion, property, age, culture, literacy, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

2.2. Potentially Affected Parties

Affected parties include local communities, community members, and other parties that may be subject to direct impacts from the Project.

CDPs preparation will involve broader stakeholders at all levels to ensure the key processes are inclusive and guided by good governance principles, including transparency, disclosure and stakeholder engagement and participation. The LWG will be engaged throughout the preparation of the CDPs under Component 1 as a consultative group to advise and guide the development of the CDPs, prioritize the interventions, and increase local ownership of the final CDPs developed.

Site-specific investments, such as civil works will need to be implemented with participation of host communities and understanding of impacts and mitigation measures will need to seek the views of project affected people, including vulnerable and marginalized groups. The LWG will also serve as the focal point for local communities to provide feedback or voice concerns regarding the preparation, technical design, and implementation of civil works under Component 2, as well as issues related to work quality in collaboration with ATDF, contractors, and other stakeholders.

The project will positively impact stakeholders through capacity-building initiatives that provide training and career development opportunities to key staff in regional tourism companies and small local businesses. Additionally, institutional reforms will strengthen the MoE, the TC, the ATDF, and regional and local administrations. Affected communities, including vulnerable groups, will also gain improved access to jobs and services and will benefit from improved infrastructure, such as better access to public spaces and tourism sites, contributing to enhanced quality of life. Conversely, the project activities may adversely affect local small businesses or households, if due to resettlement impacts or E&S impacts during the construction stage. All those impacts will be mitigated according to RF and ESMF.

Broadly defined, affected parties may include the following:

Table 2. Key Affected Parties of the TRIP

Stakeholder groups	Stakeholder interest	Engagement modes
Potentially affected parties and beneficiaries		
Local authorities: Hnaberd settlement of Artashat community (Dvin cluster in Ararat Region), Areni settlement of Areni community (Areni cluster in Vayots Dzor Region), Dilijan town (Dilijan cluster in Tavush Region), Yeghegis community of (Yeghegis cluster in Vayots Dzor Region), Gyumri town (Gyumri cluster in Shirak Region), Goris town (Goris cluster in Syunik Region) and Jermuk community (Jermuk cluster in Vayots Dzor Region).	Will be engaged in working directly with the affected population, communicating the Project aim to the residents, organizing public hearings and information disclosure, gathering the residents' concerns and suggestions as well as mitigating miscommunications. The affected settlements, as well as extended communities, are interested in the infrastructure development. The Project will contribute to social-economic and cultural development of affected settlements which will benefit on the whole and local SMEs especially from rehabilitation of basic infrastructure and services leading to improved access to tourism sites (access roads, parking, street lighting, etc.), improved street lighting and safety, and other public investments. Might be interested in receiving training and job opportunities related to the tourism industry.	Meetings, public consultations, workshops and presentations.
The local population: the residents of the settlements	Interested in employment opportunities. Interested in benefiting from the economic	Public consultations, Focus group discussions;

living in the neighborhood of the project affected areas. May be affected by the transportation of building materials, noise, vibration, air pollution and road safety issues or other construction-related impacts.	opportunities that the project may bring to the communities. May be affected by impacts related to land use / access restrictions, temporary or permanent land acquisition / easement.	Disclosure of project documents (including ES documents); Mass media communication; Local liaison officer; Individual meetings
Tourists Tourist is a person who travels from a place of residence to a different town, city, county, and state for purposes of business, pleasure, recreation, education, arts, heritage, or culture. So, all the touristic sites should be attractive with appropriate infrastructure, green and ecofriendly to attract foreign as well as internal tourists.	Seek improved access to attractions and services, enhanced safety, and a better overall experience. Interested in eco-friendly tourism options and sustainable practices that minimize environmental impact. May be affected by the restricted access due to the Project.	Mass media Banners Disclosure of written information Warning signs and barriers
Youth	This group of stakeholders may benefit from improved connectivity and access to key attractions through green alternative modes (electric buses, cycling, etc.).	Public consultations Disclosure of written information
Small and medium enterprises located near/along the existing and connecting roads or the construction sites and their employees	May be affected by the access restrictions due to the Project works. Interested in raising revenues, increased procurement due to the Project activities.	Public consultations Individual meetings Disclosure of written information
Interested parties		
Ministry of Economy and TC	The MoE and TC are directly interested in the advancement of tourism infrastructure and preparation of Cluster Development Plans (CDPs) and associated analytical studies under the GoA's Cluster Approach. Interested in aligning Cluster Development Plans (CDPs) with national and regional development strategies to enhance tourism. Interested in fostering community engagement and ownership in tourism initiatives.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Ministry of Environment (MoEnv.): Environmental Impact Expert Examination Centre SNCO (State Environmental Review body) The Forest Committee and its	Ensures environmental protection and rational use of natural resources. The MoEnv., through its key departments, will have administrative authority over the project approval processes in compliance with environmental protection legislation. Is in charge of controlling the State EIA.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone

"Hayantar" (ArmForest) SNCO		calls
Cadaster Committee	Maintains state registry of real estate, promotes the development and implementation of land policy. Cooperation with the Committee is important in relation to land acquisition.	Consultation meetings E-mails / Letters / Phone calls
Ministry of Education, Science, Culture and Sports	In charge of historical and cultural sites in Armenia. Interested in avoiding impacts on local historical and cultural sites. Interested in case of potential chance finds during the Project construction.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Regional administrative offices (Marzpetarans)	Key stakeholder in terms of consultations on the measures to be implemented on the regional level. Interested in enhancing service delivery and infrastructure to improve the overall livability and attractiveness of their regions. Interested in institutional capacity building to effectively manage and promote local tourism offerings.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
Partners		
Private Sector (Investors and Entrepreneurs) The list of private businesses to be engaged as stakeholders will be further developed during project implementation as specific interventions for each cluster are identified.	Aiming to participate in the development and promotion of tourism clusters for increased business opportunities. Interested in public-private engagement to enhance collaboration and investment in tourism initiatives.	Public consultations, Focus group discussions, Disclosure of project documents (including ES documents) Mass media communication Local liaison officer Individual meetings

2.3 Other Interested Parties

The projects' stakeholders also include parties other than the directly affected communities and/or parties (Table 3). These include:

- Non-government organizations (NGOs) and CSOs as development partners: DMOs
- Organizations involved in research and academia: Tourism faculties of different universities in Armenia and students of tourism schools.
- Local media illustrating the civil works and other activities implemented under the Project.

Table 3. Other Interested Parties of the TRIP

Stakeholder groups	Interest	Engagement modes
National NGOs: Armenian Women for Health and a Healthy Environment (AWHHE), Birds of Armenia (BoA)	Consultations on specific topics, such as biodiversity, gender issues, or cultural heritage ⬚ Interested in	Workshops Public meetings Private meetings Disclosure of written information

Project, Acopian Center for the Environment (ACE), CENN (Caucasus Environmental NGO Network) - Armenia office, Armenian Birdwatching Association, (AWP) WWF Armenia, ECOLUR Information Network, ICOMOS-Armenia, Hazarashen Armenian Center for Ethnological Studies (UNESCO accredited NGO), Armenian Architecture Research Foundation, Regional Center for Cultural Heritage, "Trails for Change" tourism NGO, Sustainable Tourism Development in Armenia NGO, and others. **Regional and local NGOs and other civil society organisations**, e.g.: Sisian Tourism Center; Sisian Women's Resource Centre Foundation; Kapan Women's Resource Centre NGO, Khustup environmental NGO, Ecological Safety and Democracy NGO, ECO SIS NGO; Kajaran Condominium for gender issues, "Guides from the South" Tourism Development NGO, Syunik Development NGO, Goris development center NGO, Sustainable development NGO, Shirak center NGO, Dilijan Youth Cooperation Center NGO, Shen NGO, Bridge of hope NGO, Arpa foundation	the information about the planned Project activities, its positive and negative impacts on the people and the environment. Close cooperation with NGOs will allow the Project to ensure smoother communication with the residents and organize more inclusive public hearings.	E-mails / Letters / Phone calls
Academia: School of tourism at Bryusov State University, school of service at Yerevan State University (YSU), Graduate certificate course in Tourism and Hospitality at the American University of Armenia (AUA)	This group can be supportive and have its valuable input in development of policy and reforms	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls
DMOs The following private DMOs are currently operating within the designated priority clusters: 1. Goris Cluster - Syunik DMO. 2. Gyumri Cluster - Shirak DMO. 3. Dilijan Cluster- Go To Dili DMO in Tavush region. (No DMOs currently operate in Areni, Aparan, Yeghegis and Dvin Clusters)	This group can be highly interested in participation in this activity as the improved infrastructure can contribute to enhanced opportunities.	Workshops Public meetings Private meetings Disclosure of written information E-mails / Letters / Phone calls

Local media **Ararat marz (Dvin cluster)**- "Ararat", "Artashat" newspapers. **Shirak marz (Goris cluster)**- "Gala", "Shant", "Tsayg" television channels, "Radio hay Gyumri" radio channel. **Syunik marz (Goris cluster)**- "Gorisi mamuli akumb", "Gorisi yeritasardakan "Sharavigh" akumb, "Sisian info" web pages, "Ban and gorts", "Zangezur", "Vorotan", "Syunyats yerkir" newspapers, "Zangezur", "Syunik" TV channels. No local media in **Vayots dzor and Tavush marzes (Areni, Yeghegis and Dilijan clusters).**	Fruitful collaboration with media may ensure broad public outreach on the Project. Local media are interested on the fresh materials for interviews and reportages.	Interviews Press releases Disclosure of written information E-mails / Letters / Phone calls

2.4 Disadvantaged and/or Vulnerable Groups

Within the Project, vulnerable and/or disadvantaged groups may include people who due to their circumstances may experience disproportionately adverse impacts from project activities and/or may face a higher risk of exclusion compared to other groups (Table 4).

These groups may include but not limited to:

- People with disabilities
- Elderly, especially those living alone
- Women-headed households
- Families with many children
- Ethnic minorities
- Refugees

Table 4. Potentially vulnerable and marginalized groups

Stakeholder group	Interest/vulnerability	Engagement modes
Families registered as living below the poverty level, pensioners-headed households with no support, single-parent families, female headed households with no working adults, multi-children families, people with disabilities	May have difficulties to access or understand the information, provide feedback on the E&S aspects of the Project, or need specific assistance to assert their rights. May be interested in temporary employment opportunities.	Public meetings Special purpose events (meetings) Individual meetings Disclosure of written information Consultation support
Displaced people	People from Nagorno Karabakh residing in the settlements that are close to the proposed project sites.	Public meetings Special purpose events (meetings) Individual meetings Disclosure of written information Consultation support
Children living in the settlements close to the	May be exposed to risks related to traffic to/from the Project's construction sites and need tailored	Public meetings; Disclosure of written information;

construction sites	information on road safety	Warning signs and barriers

Vulnerable groups within the communities affected by the Project may be identified, confirmed, and consulted through dedicated means, as appropriate. Approaches and/or representative organizations who can be engaged as partners to engage these groups will also be identified during the early stages of project implementation. The methods of engagement that will be employed by the project are outlined in the following sections.

To ensure participatory inclusion of women in discussing socioeconomic issues related to tourism development of their region/community, as well as to engage representatives of local business community dealing with tourism in identifying key obstacles and main directions of development of tourism-related sectors the engagement activities were conducted in the Project preparation period, which are described in the section 3.2.

2.5 Modalities for Engagement

The TRIP relates to a large variety of stakeholders, ranging from ministries at the national level, to community and vulnerable groups. Engaging these actors helps to: 1) build a shared understanding and vision among all these key stakeholders; 2) understand capacity gaps and respond accordingly; and 3) coordinate all related initiatives and lead technical debates.

Mechanisms for stakeholder engagement across different groups are expected to include but not limited to public consultations, interviews and focus groups discussions, including outreach to enable safe platforms to raise concerns.

The project will adopt a participatory approach from the outset, ensuring broad local involvement in the development of CDPs. Representatives from key tourism sectors, such as accommodation, catering, travel agencies, and transport services, will be engaged, with a focus on including women, youth, and family-owned businesses. Their insights, gathered through consultations, will inform tailored development strategies, ensuring relevance and effectiveness. Additionally, by documenting essential details like age, gender, specialization, and contact information, the project will foster ongoing connections with these stakeholders, encouraging their active participation in future activities and supporting professional networking within the local tourism ecosystem.

During the screening process the vulnerable groups of the affected communities will be identified, for instance women-headed households, ethnic minorities, persons with disabilities, extremely poor households, etc. These groups need meaningful consultation. Meaningful stakeholder engagement will focus on consultations, collaboration and empowerment of stakeholders, and two-way communication. Special information and communication materials will be prepared and disseminated among these groups. Focus group discussions, round table discussions, and separate meetings can be organized with the representatives of those groups or separate people to reveal their opinion about the project, their concerns and needs for inclusion in the Project. The concerns and suggestions should be considered during the elaboration of detailed designs as much as possible and feedback should be provided to the parties concerned.

Prior disclosure of relevant information in Armenian in a format accessible to target groups will be performed in advance of any public consultations, interviews and/or focus group discussions. This will also include disclosure of available Grievance Redress Mechanism (GRM) channels. The feedback, opinions and suggestions received from the stakeholders will be taken into account and reflected in Project activities. They

will be recorded by the GRM, discussed and considered as much as possible even if they may result in the design modification.

Engagement associated with CDPs development will be integrated as part of public deliberation and consultation processes to solicit stakeholders' feedback prior to their adoption.

The project will support the establishment of LWG at the community level by the municipalities, comprising not just local representatives and heads of communities, but also local NGOs, nominated active residents, and the private sector. This platform will serve for women to actively participate and be represented. To increase the participation of women in decision making roles and ensure that their views are also considered in the CDPs, the LWGs will be comprised of at least 30 percent of women. The nature of LWG is to be engaged throughout the preparation of the CDPs as a consultative group to advise and guide the development of the CDPs, be the bridge between the community and contractors during the implementation phase. Thus, the inclusion of women in LWGs is not merely a matter of equity but also a strategic approach to enhancing the effectiveness and inclusiveness of community development efforts. Women participation brings diverse perspectives, addresses gender-specific concerns, enhances local ownership, empowers individuals, improves social cohesion, and ensures representation and advocacy**.**

Simultaneously, identifying local NGOs, particularly those involved in gender, social vulnerability, and youth issues, will be vital. Ideally led by women, these organizations can offer valuable perspectives on community challenges, facilitate focus group discussions, and ensure marginalized voices are heard. In areas lacking local NGOs, efforts will focus on engaging active women, youth, or regional NGOs with relevant experience. Their involvement will not only contribute to grassroots knowledge but also support the monitoring of the project's social and gender impacts, ensuring that inclusivity remains a core principle throughout the initiative.

3. STAKEHOLDER ENGAGEMENT ACTIVITIES

The project seeks to foster meaningful consultations with stakeholders identified above, particularly with those that may be adversely affected to ensure potential impacts can be avoided and/or mitigated through a participatory and inclusive process. The following outlines the engagement undertaken for preparation and activities planned to support Project implementation.

3.1. Summary of Stakeholder Engagement during Project Preparation and Implementation

During Project preparation the project team (PT) at ATDF will further identify individuals or groups who may have different concerns and priorities about project impacts, mitigation mechanisms and benefits, and who may require different, or separate forms of engagement and various methods of communication.

Once the SEP is finalized and approved, it will be biannually updated to reflect any modifications of the Project, as well as potential change in stakeholders and their interests and impacts.

This SEP is developed in proportion to the nature and scale of the project, as well as its potential risks and impacts. The draft SEP will be disclosed as early as possible, and prior to project appraisal, to gather stakeholder input, including feedback on stakeholder identification and proposals for future engagement. If significant changes are made to the SEP, the updated version will also be disclosed. The project will undertake engagement activities over the course of its implementation. The detailed description of the planned SE activities is given in Annex 2.

3.2. Gender Issues and Citizen Engagement Activities Conducted in Project Preparation Period

To ensure participatory inclusion of women in discussing socioeconomic issues related to tourism development of their region/community, as well as to engage representatives of local business community dealing with tourism in identifying key obstacles and main directions of development of tourism-related sectors the following activities were conducted:

In May 24, Zoom-discussion was conducted with the DMOs. The female-managers of 4 DMOs (Goris, Dilijan, Gyumri and Yeghegnadzor) have presented common issues and local specifics of tourism-related sectors in their regions/cities with emphasizing employment opportunities for women, youth, elderly and gaps in their professional knowledge and skills. The recommendations were summarized by two groups: specific for their regions (Syunik, Tavush, Shirak and Vayots Dzor) and general which are common to the entire tourism industry.

In June 21, Zoom-discussion was conducted with members of WINNET (Women Resource Centres NGOs Network, https://winnetarmenia.org/en). The founders/leaders of 7 WINNET member NGOs discussed the necessary measures to promote women's work participation and entrepreneurship in tourism related sectors. The participants highlighted also the role that the WINNET Armenia network play in supporting employment of women and socially vulnerable people, including trough creating social enterprises in (handicrafts, souvenirs, master classes, etc.).

In July-August 2024, Survey was conducted among the business community (as Experts on tourism) of 7 tourism development clusters. The lists of 116 business-organisations with contacts of their heads/managers

were provided by 4 DMOs and 2 Regional Governments (Ararat and Aragatsotn marzpetarans). The selection of business-organisations to be surveyed was conducted based on a) diversification of tourism-related businesses, and b) willingness of the selected businesses to fill in a questionnaire. The survey was conducted through e-mails based on the preliminary developed questionnaire. Due to internet/communication problems of some of survey-participants, 4 interviews were conducted by phone. In total, 34 questionnaires were filled in, the survey database was created and used for preparation of summary tables and analysis of data.

To address the identified gaps, the project aims to create inclusive, gender-responsive programs that enhance opportunities for both women and youth in tourism-related sectors, as employees and entrepreneurs. By partnering with local communities, self-governments, and various organizations, the project will support the development of formal employment incorporating women's preferences, needs, and design contributions through a participatory gender-inclusive process.

3.3. Information Disclosure

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and GRM, and on the project's overall implementation progress.

The following principles will be applied when disclosing information on Project activities:

- The project will ensure that information to be disclosed is comprehensive and easily accessible and will be delivered to the stakeholders in a timely and qualitative manner,
- Information disclosure processes will be initiated at the very beginning of the Project and will be continued through the entire circle of the Project,
- Diverse information portals will be used for information disclosure including but not limited to the official websites, social media, news outlets, etc.

Information Disclosure Preliminary Strategy is presented on Table 5.

Table 5. Preliminary Strategy of Information Disclosure

Project stage	Target stakeholders	Information to be disclosed	Methods and timing proposed
Project preparation	• Communities and settlements • Private Sector (Investors and Entrepreneurs) • Regional administrative offices • Local and National NGOs • DMOs • Mass media	CDP	• Post on the ATDF and TC web page the Cluster brief information • Presentations for the local and regional stakeholders
		ESMF	• Posted on the ATDF web page • Public consultations
		SEP	• Posted on the ATDF web page
		RF	• Posted on the ATDF web page • Public consultations
		ESCP	• Posted on the ATDF web page • Public consultations
		LMP	• Posted on the ATDF web page
		POM	• Posted on the ATDF web page
Subproject pre-design	Municipalities, CSOs, NGOs, and DMOs, private sector, Local population	▪ Briefs on sub-projects	• Sharing an informative leaflet on project activities including description and activities of

			components and subcomponents, • Disclosed at TC and ATDF websites and the target communities websites, social networks • Public consultations
Design	Communities of the selected clusters, CSOs, NGOs and DMOs working in the selected regions, PAPs, SMEs, local population	1) ESIAs in compliance with the RA EIAE Law, 2) draft ESMPs and RPs approved by the WB 3) Presentation of GRM 4) Disclosure of the updated SEP, final ESMPs 5) Disclosure of LMP 6) Disclosure of RPs, if any	• Disclosed at ATDF website and the affected communities websites, social networks during the design preparation period before the commencement of civil works • Public consultations on the E&S documents
Pre-construction	Communities of the selected clusters, CSOs, NGOs and DMOs working in the selected regions, PAPs, SMEs, local population	1) Construction Launch	• Construction Launch meeting • Announcements on the web media • Public consultations
Construction	Communities of the selected clusters, PAPs, local population	1) Construction progress 2) GRM 3) Temporary outages of the utility (water, gas, electricity) related to construction works	• Web pages of ATDF and municipalities • Web media • Announcements on the information boards of the municipalities • Leaflets
Project closure and operation	MoE/TC, ATDF, Regional administrations, communities of the selected clusters, interested state agencies, CSOs, NGOs and DMOs working in the selected regions, public in general	Project completion report	• Disclosed at MoE and/or TC, ATDF websites and the target communities websites after completion of civil works

3.4. Resources and Responsibilities

3.4.1 Management functions and responsibilities

A High-level Project Steering Committee (PSC) will be established, by Decree of the Prime Minister prior to effectiveness, to provide overall oversight and inter-agency coordination of project implementation. The PSC will be chaired by the Deputy Prime Minister (DPM) and will comprise representation from all the relevant stakeholders and institutions, including the Ministry of Economy, Ministry of Territorial Administration and Infrastructure, Ministry of Education, Science, Culture and Sports, and other relevant line ministries, government agencies, and local and regional bodies, as may be needed. The main purpose of the PSC is for strategic discussions regarding the Project, high-level decision making, including the approval of CDPs and subprojects, and facilitating inter-agency cooperation given the multi-sectoral nature of the project. The MoE will facilitate the activities of the PSC. It is expected that the existing PSC under LEIDP and its general functions will be carried over into TRIP, and the composition, representation and frequency of meeting of the PSC will be elaborated in the Project Operations Manual (POM).

The MoE will provide the overall decision making and strategic leadership of the Project**.** The ATDF is the implementation agency (IA) which will form a Project team (PT) including required specialists for successful implementation of the TRIP project. The ATDF will be responsible for implementation of this SEP.

The implementation of the Stakeholder Engagement Plan (SEP) involves collaboration across multiple specialists to ensure that all aspects of the project SE are adequately addressed.

The Social Specialist will be tasked with overseeing the implementation of the SEP. This includes ensuring compliance with all activities and timelines as outlined in the SEP activities (Annex 2). Social Specialist will be responsible for updating, adopting, and executing the SEP, including the development of various engagement mechanisms for stakeholders and vulnerable groups.

The Social Specialist will coordinate with regional Community Liaison Officers (CLOs) to ensure meaningful consultations and organize public consultation meetings.

One CLO will be assigned to each of the selected cluster. The CLOs will support the Social Specialist by conducting stakeholder engagement activities in the regions, identifying target and vulnerable groups, organizing consultations, and acting as GRM focal points.

Other specialists involved in SEP implementation will include Environmental Specialist, M&E specialist and technical specialists. The Environmental Specialist will assist the Social Specialist in organizing and conducting public consultations, where both environmental and social concerns can be addressed simultaneously. The M&E Specialist will support the Social Specialist by designing and implementing a monitoring framework to track the outcomes and impacts of the SEP activities. The M&E Specialist will contribute to regular reporting on SEP activities, highlighting areas where social engagement is succeeding and identifying areas for improvement. Technical Specialists (engineers, supervisors) will help explain technical aspects of the project to stakeholders during consultations, ensuring that communities understand how the project may affect their environment and social life.

3.4.2 Resources

The project will contract Community Liaison Officers (CLOs) to operate in each of the seven clusters. These CLOs will support the implementation of SEP activities, reporting to the Social Specialist and the wider E&S team within ATDF.

The resource requirements for SEP implementation are generally allocated to key areas such as staffing, communication campaigns, capacity building, GRM implementation, and other essential activities to ensure effective stakeholder engagement and project communication. SEP budget is presented in Annex 4.

4. GRIEVANCE REDRESS MECHANISM

4.1. Introduction to GRM

The grievance mechanism (GM) provides a transparent and credible process for fair, effective and lasting outcomes. It also builds trust and cooperation as an integral component of broader community consultation that facilitates corrective actions.

The GM addresses grievances that arise in the Project under all components either due to actions by the ATDF or the consultants and contractor/sub-contractors employed by the ATDF from affected communities and external stakeholders. A separate mechanism is developed to address worker grievances. The process is described in the LMP. The ATDF is responsible for managing the GM, but many of the grievances on the Project will likely relate to the actions of the Contractors and Consultants and so will need to be resolved by them. The ATDF with the support of the Design Consultant and/or Technical Supervision Consultant will administer the GM process deciding whether they or the Contractor is responsible and determining the best course of action to resolve the grievance. The Consultant will support the ATDF to monitor grievance resolution being undertaken by the DC or Contractor.

The Project GM deals with resettlement issues: land and other assets acquisition (e.g., amount of compensation, suitability of residual land plots, loss of access roads and business, etc.) as well as the losses and damages caused by construction and /or rehabilitation works. Therefore, the GM is described also in the Resettlement Framework in details.

The GM is an instrument with which:

- Affected people can make a complaint or resolve any dispute that may arise during the course of the implementation of the Project;

- The ATDF ensures that appropriate and mutually acceptable redress actions are identified and implemented to the satisfaction of complainants;

- The ATDF supports accessibility and transparency in handling complaints and grievances;

- The ATDF manages time factor (avoids the need to resort to judicial proceedings (at least at first).

Typical grievances under component 2 may relate to:

- Land acquisition and physical displacement;

- Civil work damages;

- Environmental impacts; and

- Direct and/or indirect social - economic impacts.

GRM will include the following Steps:

Step 1: Submission of grievances either in writing via through telephone hotline/mobile, mail, social media (FB etc.), website, and grievance logbook via a contractor organization and directly to the TC or ATDF. The GM will also allow anonymous grievances to be raised and addressed.

Step 2: Recording of grievance, classifying the grievances based on the typology of complaints and the complainants to provide more efficient response, and providing the initial response immediately as possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with disabilities, etc.) and the nature of the complaint.
Grievance Focal Point (Stage 1)

Stage 1 of the GM involves recording the complaint (whether written or oral) in the GRM log which will be prepared and provided to the communities and contractors. The grievances will be recorded by focal points at community level and at construction sites assigned by the community and by the Contractor respectively. Once a standing grievance has been logged, it will be solved immediately by the community administration or the Contractor if possible. If the grievance needs detailed study of the case and it cannot be resolved the PAP is informed about grievance resolution procedures of Stage 2. A PAP has the right to use the procedures of Stage 2 without applying to Stage 1 procedures. Timeframe for resolving the stage 1 grievance is 7 days.

Grievances will be resolved at the local level, where possible. Where this is not possible, they will be forwarded to the GRC established at the Project level. Grievances and their resolution will be recorded and redressed in an appropriate time frame of no more than 2 weeks.

Grievance Resolution at Project Level (Stage 2)

At this stage, the grievance will be reviewed at the ATDF level. Unsolved grievances at Stage 1, with the complainant's consent, will be sent to the ATDF in written form. Similarly, aggrieved complainants/PAPs dissatisfied with the resolved grievance at Stage 1, can escalate their grievances to the ATDF. The focal point from the community will assist him/her in lodging an official complaint. The ATDF's GM coordinator will review the written complaints of PAPs, which were not satisfied at Stage 1 and send them internally to the appropriate departments for redress. The timeframe for referral is 10 days. The complainant shall be informed of the decision within a maximum of 30 days.

4.2. Closure of Grievances

A grievance will be considered "resolved" or "closed" when a resolution satisfactory to both parties has been reached, and after corrective measures has been successfully implemented. When a proposed solution is agreed between the Project and the complainant, the time needed to implement it will depend on the nature of the solution. However, the actions to implement this solution will be undertaken within one month of the grievance being logged and will be tracked until completion. Once the solution is being implemented or is implemented to the satisfaction of the complainant, the status of the complaint in the GRM log will be marked as "Closed". The GRM log will be submitted to the World Bank team.

In certain situations, however, the Project may "close" a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complaint refers to the technical solutions of the design and it cannot be modified, or the grievance has no justification and contains incorrect information or data. In such situations, the Project's efforts to investigate the grievance and to arrive at a conclusion to reject the complaint. The status of the grievance in this case will be "Rejected". The complainant will be notified about the decision within a month from the date of the grievance record.

The GRM chart with the two stages is presented below.
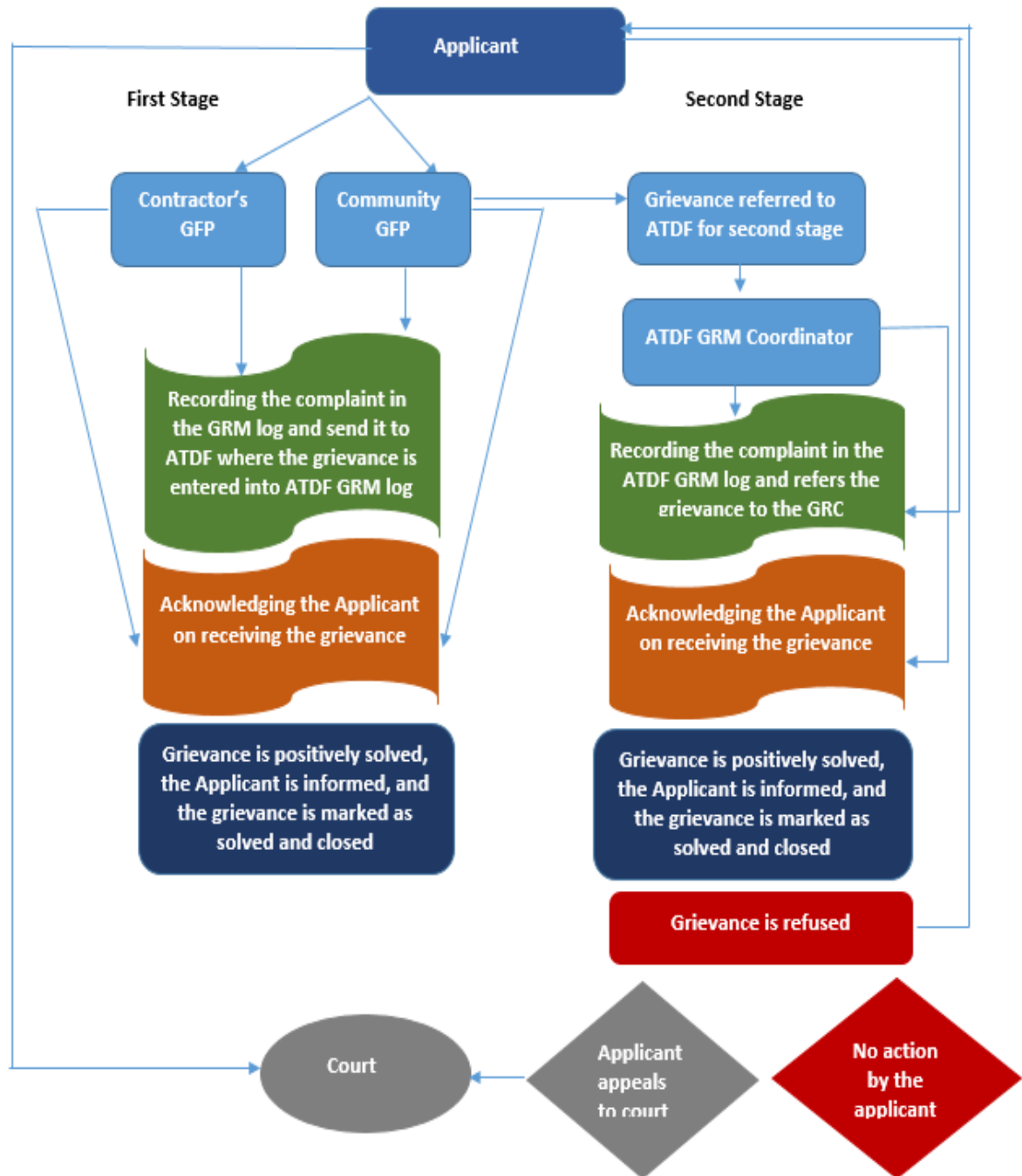
Figure 4. GRM Chart

4.3.   Grievance Records and Documentation

The ATDF will nominate a GM Focal Point to manage a grievance log to keep a record of all grievances received. The log will contain the name of the individual or organization lodging a grievance; the date and nature of the grievance; any follow-up actions taken; the solutions and corrective actions implemented by the Contractor or other relevant party; the final result or status of the grievance.

The Supervisor and construction companies in their monthly monitoring reports will provide information on grievance management. Grievance monitoring and reporting will occur in the ATDF's semiannual and annual progress reports to be prepared for the WB.

Information on the Project and GRM will be available on the ATDF's website and will be posted on information boards in affected communities in the Project area (see Annex 3, the form for the GRM focal points contact information). Information can also be obtained from the GM Focal Point. **The GRM mechanism will not impede access to the Country's judicial or administrative remedies.**

4.4. Communicating GRM to the Project Stakeholders

The ATDF through the E&S team will establish a first step of grievance redress mechanism at the local level in cooperation with local authorities, in order to provide a direct channel to the affected persons and community members for voicing any grievances with the Project. A local Grievance Redress Committee (GRC) may consist of local government, and civil society representatives, if available locally. The contact information and mechanism to submit verbal or written grievances will be publicized extensively among the local community (for example, through visible boards, complaints boxes, information boards in public offices, during project consultations, etc.). Contact information such as name, telephone, email of local focal point for grievances will be clearly stated. The ATDF is responsible to verify that local grievance redress mechanisms are present and properly advertised. It is also the ATDF's responsibility to monitor that grievances are properly recorded at the local level.

Grievances will be resolved at the local level, where possible. Where this is not possible, they will be forwarded to the GRC established at the Project level. Grievances and their resolution will be recorded and redressed in an appropriate time frame of no more than 2 weeks.

4.5 SEA/SH Grievances

The SEP establishes sensitive procedures related to grievances concerning Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH) (SEA/SH), ensuring a survivor-centered approach.

All complaints, especially SEA/SH-related, will be treated with strict confidentiality. The identity of the survivor will be protected at all stages. The procedure will follow a survivor-centered approach, prioritizing the survivor's needs, consent, and preferences. Referral mechanisms to support services will be established to support the survivor to find services they might need (health, legal, or psychosocial, etc.).

Investigations into SEA/SH grievances will be handled sensitively and confidentially. No action will be taken without the survivor's informed consent. The survivor will be involved in deciding how the complaint is handled, including whether an investigation proceeds. A strict no-retaliation policy will be in place, ensuring that survivors and witnesses are protected from any form of retaliation for reporting SEA/SH cases.

SEA/SH grievances will be prioritized and resolved within a clearly defined timeframe, typically within 30 days or sooner, depending on the severity of the case. The survivor will be regularly updated on the progress of the grievance resolution process, ensuring transparency and trust in the procedure.

Details on addressing grievances related to workplace concerns, including those involving Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), are provided in the Project LMP.

4.6 Grievance Resolution

The GRC at Project level will be established to address complaints and grievances pertaining to resettlement and to pre-empt all disagreements being referred to the court. The GRC will include ATDF staff, and representatives of the relevant state authorities and/or Marzpetaran in the Project area, and communities affected by the components of the TRIP Project. The composition of the GRC will be shared with the WB team prior to commencement of RAP preparation and of any construction work under the Project. The GRC will be convened by the ATDF on a case-by-case basis, to address complaints and grievances pertaining to resettlement.

The Project-level GRC procedure must ensure maximum access, transparency, disclosure and participation and will be aimed at maximum protection of interests of affected population.

The GRM for workers will be available in LMP prepared for the Project.

Annex 1. Photos of the meetings held in the cluster selection phase

Annex 2. Planned Stakeholder Engagement Activities

Project Activities	Stakeholder engagement method	Target Stakeholders	Objective of stakeholder engagement activity	Topic of consultation / message	Responsibilities
Component 1. Fostering Integrated and Sustainable Cluster Development *Subcomponent 1.1: Development of Cluster Development Plans10*					
1. Development of CDPs	• Regional round table workshop • Working group discussions • Forums on social media • Public meetings	MoE, MoESCS, MoTAI, Ministry of Environment, TC, ATDF, regional administrations of Ararat, Aragatsotn, Shirak, Syunik, Tavush and Vayots Dzor, DMOs, CSOs, NGOs, private sector	• Ensuring participatory preparation of cluster concepts, public awareness campaigns and associated citizen engagement activities during and after the development of CDPs to ensure local ownership and informed decision-making.	• Cluster concept • Presentation of draft CDPs • Consideration of feedback and suggestions	TC and ATDF through TA Consultant
2. Presentation and disclosure of draft and final CDPs	• Regional round table workshop • Forums on social media • Public meetings • Websites (ATDF, MOE, local communities, regional administrations)	MoE, MoESCS, MoTAI, Ministry of Environment, TC, ATDF, regional administrations of Ararat, Aragatsotn, Shirak, Syunik, Tavush and Vayots Dzor, DMOs, CSOs, NGOs, private sector	• Enabling key stakeholders to provide their opinion, feedback, suggestions on the draft CDPs • Integrating and addressing raised suggestions, opinions and considerations	The content of CDPs	TC will coordinate presentation of the CDPs, ATDF will coordinate disclosure of draft and CDPs on social media and websites, including regional administrations and local communities
3. Provision of trainings, tools, vocational education	• Information on trainings and vocational education will	DMOs, CSOs and regional tourism organizations	• Technical support for branding, marketing, and	• Branding, • Marketing, • Promotion activities,	TC and ATDF through TA Consultant

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10 The SE activities for CDP preparation plan will be revised for the final SEP according to the Gender analysis implemented in the framework of the Project

	be sent by email list • Announcement on trainings will be placed on social media sites of the target communities		promotion activities within the tourism value chain, • Development and implementation of site management plans to enable sustainable operations and maintenance of touristic products • Information, data collection and reporting of local tourism statistics	• Site management plans development and implementation, Data collection and reporting	
4. Establishment, management, and operations of DMOs	• Round table discussions with participation of established DMOs' representatives	CSOs, NGOs, tourism organizations potentially interested in destination marketing	• Supporting better local tourism management	Role of DMO in regional tourism development	TC and ATDF through TA Consultant
Component 2. Supporting Climate-Resilient Infrastructure and Promoting Private Sector Participation in Local Economies **Sub-component 2.1 Rehabilitating and Upgrading Infrastructure and Services**					
5. Elaboration of designs for subprojects (including development of ESIAs, ESMPs, RPs if any, GRM, and update of SEP)	• PC meetings to present draft ESMPs, ESIAs and RPs • Meaningful consultations with PAPs • Separate meetings for women and vulnerable groups; • Social Media - Facebook, WhatsApp; • Disclosure of documents on the official websites • Dissemination of written information - brochures,	• The affected communities: Hnaberd settlement of Artashat community (Dvin cluster in Ararat Region), Areni settlement of Areni community (Areni cluster in Vayots Dzor Region), Dilijan town (Dilijan cluster in Tavush Region), Yeghegis community (Yeghegis cluster in	• Enabling key stakeholders to provide their opinion, feedback, suggestions on environmental and social impacts and suggested mitigation measures • Integrating and addressing raised suggestions, opinions and considerations	Disclosure of draft • RPs, • ESIA reports • Site Specific ESMPs Providing information about GRM	ATDF, design company, ESIA and RAP Consultants

	posters, flyers, website	Vayots Dzor Region), Gyumri town (Gyumri cluster in Shirak Region), Goris town (Goris cluster in Syunik Region), Jermuk town (Jermuk cluster in Vayots Dzor Region) • People affected by land acquisition and resettlement; • SMEs; • People residing in project area; • Vulnerable households			
6. Civil works	• Public notification meetings, • Info boards, • Dissemination of written information - brochures, posters, flyers, website	• Affected communities; • PAPs (if any); • SMEs located nearby; • People residing in project area; • Vulnerable households to be aware of temporal employment opportunities	• Raising awareness of the affected stakeholders on the construction activities • Encouraging affected and beneficiary communities to take responsibility and develop sense of ownership for improved infrastructures	• Construction activities • ESHS • GRM	Project Manager, Project Coordinator, E&S team, Contractor, Technical Supervision Consultant
7. Operation	• Public notification meetings, • Mass media • Info boards, • Private meeting	• Affected communities; • PAPs (if any); • Tourists • Entrepreneurs and businesses	• Raising awareness on the new destinations and tourism infrastructures developed under the project • Monitoring of	• New destinations and tourism infrastructures • New investment and business opportunities • Livelihood restoration of the PAPs	MoE DMOs ATDF External monitoring consultant

			the livelihood restoration process of affected PAPs		

Component 2: Supporting Climate-Resilient Infrastructure and Promoting Private Sector Participation in Local Economies
Subcomponent 2.2: Fostering Private Sector Participation, Enhancing Professional Skills, and Enabling Job Creation

8. Public private investments and enabling public-private partnerships (PPPs)),	• Information on partnership possibilities will be sent by the contact information available at MoE • Round table discussions	• Private sector, potential investors	• Development of PPPs	• Public-private partnerships	MoE, TC and ATDF, LSGBs, Consultant, Liaison Officers
9. Incremental financial support for business development (e.g., matching grants)	• Announcements publicized at the TC, ATDF, LSGBs' websites, • Announcements placed on social media sites of the target communities	• Regional tourism organizations in target regions, • DMOs	• Provision of matching grants	• Possibility for business development	TC and ATDF, LSGBs, Consultant, Liaison Officers
10. Provision of professional skills development	• Announcement on trainings will be placed on social media sites of the target communities, • Meaningful consultation will be provided to vulnerable and disadvantaged groups, • Informative leaflets will be disseminated in the target communities and settlements	• SMEs, local communities, and tourism workers • Priority will be given to disadvantaged communities and groups (e.g., women, youth, and vulnerable groups)	• Upgrading professional skills and knowledge	• Possibility to develop professional skills	TC and ATDF through TA Consultant, Liaison Officers

Annex 3. The GRM focal points and the GRM coordinator's contact information publication form

Description	Contact Details
GRM focal point at community level	
GRM Coordinator	
To:	
Address:	
E-mail:	
Website:	
Telephone:	

Annex 4. SEP Budget

Budget categories	Quantity	Unit cost per year, $	Total costs, $	Remarks
1. Service contracts				
Community Liaison Officers in Municipalities	7	1,000	7,000	1 in each Marz. CLOs will be hired before sub-project preparation activities start in each community and will be maintained till completion of construction works.
2. Events				
Training on the ES Project documents (SEP, RF, ESMF, LMP, ESCP) for the municipalities and NGOs	7	0	0	
Public consultation on the sub-project related ES documents (ESIA, ESMP, SEP, LMP)	28	0	0	
Construction launch meeting	10	600	6,000	
Training on environmental, social issues for Contractor /Consultant staff	10	500	5,000	
3. Paper based products				
Informative leaflets on the Project (two sided)	200	0.6	120	
Brief informative leaflets on the Clusters (two sided)	200	0.6	120	
TOTAL STAKEHOLDER ENGAGEMENT BUDGET			18,240	