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# Report on Public Consultations

on SEA Scoping Report on

**“Strategic Development Plan, Road Map and Long Term Investment  
Plan for the Solid Waste Management Sector in Armenia”**

**Yerevan, Armenia**

**October 2016**



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## Background

Strategic Environmental Assessment (SEA) effectively promotes sustainable development by mainstreaming environment into economic development at a national and local level. SEA is a well-established, practical and efficient planning and environmental governance tool/system set out in the UNECE Protocol on SEA to the Convention on Environmental Impact Assessment (EIA) in a Transboundary Context (Espoo Convention). It ensures that strategic policy and legal frameworks and development plans in key sectors, including energy, water, waste management with likely significant adverse environmental impacts are efficiently developed taking into account environmental and health impacts and considerations. SEA ensures identification of the most sustainable and cost-effective strategic development alternatives for attracting new investments and improving its environment. SEA also helps strengthening environmental governance through fostering transparency and consultation with relevant stakeholders and the public prior to the approval of plans and programmes which significantly improves public awareness and participation to the environmental decision making at national and local levels. SEA in a transboundary context can also greatly facilitate regional cooperation on environmental matters.

The new initiative on piloting application of SEA for the Solid waste management sector in Armenia has been undertaken by the Ministry of Nature Protection, UNECE and Regional environmental center for Caucasus Armenia National Office within the frames of the "Greening Economies in the Eastern Neighbourhood" (EaP GREEN) programme funded by European Union. The overall aim of a SEA pilot project is to build capacities in application of SEA procedures at national level and raise awareness of SEA benefits among various national stakeholders.

In the frames of the project **“Application of SEA to the “Strategic Development Plan, Road Map and Long Term Investment Plan for the Solid Waste Management Sector in Armenia”** and in accordance with requirements of the National law on EIA and expertise, series of public consultation meetings were organized in the regions/marzes of Armenia aimed to improve public awareness on possible environmental and health impacts as a result of implementation of **Strategic Development Plan, Road Map and Long Term Investment Plan for the Solid Waste Management Sector. Consultations were aimed to steer discussions and useful feedback from local communities and stakeholders on current SEA study,** as well as draw ideas,

recommendations, concerns of the interested parties, local government, civil society, experts, professionals, citizens through public participation, improved local knowledge on environmental policies and current planning documents and strategies, In particular, local stakeholders and communities were provided with analysis on WMS and Strategic Development Plan/Roadmap on solid waste management sector, including its impact on biodiversity, water/groundwater resources, land, climate change, air pollution, socio-economic challenges, waste management, institutional and legal aspects as well as health hazards which might occur as a result of project implementation.

## **Information about Scoping and Scoping Report**

The scoping is usually considered to be the initial analytical stage of the SEA process. The aim of the Scoping stage is to identify environmental and health issues related to the plan or programme, which should be further analyzed within the SEA.

The Scoping is important for the efficiency of the SEA process, since it ensures that SEA focuses only on the likely significant effects which are relevant for the proposed plan or program. The results of scoping analyses and findings have to be summarized in the SEA Scoping Report<sup>1</sup>.

The Scoping in SEA for the Waste Management Plan entailed the following activities and analyses.

According to guidelines for preparation of the scoping report that was provided by the UNECE international consultants as support within the framework of the program, the scoping report should include:

- Preliminary analysis of the environmental and health baseline,
- Identification of key environmental and health issues relevant to the Waste Management Plan,

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<sup>1</sup> <http://rec-caucasus.am/sea-scoping-report-2016/> (English version),

<http://rec-caucasus.am/new-initiative-on-strategic-environmental-assessment-for-solid-waste-management-sector-in-armenia-hy/?lang=hy> (Armenian version) (Annex 1, Announcement).

- Identification of environmental and health policy objectives relevant for the Waste Management Plan,
- Identification of stakeholders and consultations with stakeholders.

## **Purpose of Public consultations on SEA scoping report of Waste Management Plan**

The purpose of this document is to gather feedback and recommendations, suggestions and concerns raised by local stakeholders with regards to implementation of the WMP, and analysis performed within the framework of the SEA Scoping Report. Public consultations served as a main tool for involvement of public authorities, civil society organizations, professional associations, business organizations, active citizens and experts into the process of identification of environmental and health risks related to WMP, including preventive measures, collection of relevant data, accumulation and synthesis of local knowledge and experiences on waste management, its institutional setting, current challenges and interests of the local population directly involved in the process. SEA consultation meetings were carried out in selected 4 regions of Armenia and in Yerevan to understand the possible links between the correspondent environmental and health issues and impact of the WMP and its further consequences for the communities and marzes where the project in planning to construct landfills and continue implementation of WMP.



Public consultation in Hrazdan, Kotayq region

## Overview of the Public Hearings /Consultation Process

As per the RA Law on ‘Environmental Impact Assessment and Expertise’ (21.06.2014) and the governmental decision (19.11.2014) Public Hearings /Consultation meetings on five Public Hearings were carried out in the frames of SEA in 4 regions of RA and in Yerevan.

Local consultations on SEA Scoping report were announced 10 days prior the hearings, placed on the website of REC Caucasus, all local stakeholders were informed in advance on upcoming consultations with official letters and announcement. Draft of the Scoping report was placed on the website and links were provided to the public at least 10 days before each consultation meeting in each community and marz where the impact of Waste management Plan and the roadmap will be visible.

### *Reference Links:*

The Final Scoping Report on SEA can be found on the official webpage of RECC:

[www.rec-caucasus.am/sea-scoping-report-2016/](http://www.rec-caucasus.am/sea-scoping-report-2016/)

The Public Hearings in 5 regions of Armenia, Kotayk, Lori, Shirak and Syunik regions and Yerevan were scheduled as follows:

### *Dates:*

1. Kotayk Region, Hrazdan city, Municipality of Kotayk /Aarhus Centre of Hrazdan – 5 August, 2016
2. Lori Region, Vanadzor city, Municipality of Lori /Conference Hall – 9 August, 2016
3. Shirak Region, Gyumri City, Municipality of Gyumri /Conference Hall – 11 August, 2016
4. Syunik Region, Kapan City, Municipality of Syunik /Conference Hall – 16 August, 2016
5. Yerevan City, City Hall – 19 August, 2016.

Official notification letters to the local municipalities informing on the aim and content of the scoping report, undertaken project were sent to all marzes and heads of municipalities.

## Consultation issues

The consultation meetings were supposed to bring together ideas, issues and recommendations that are related to the sectors (institutional and legal aspects of solid waste management, land and water contamination, socio-economic problems, conservation of biodiversity, climate change, GHG emissions, waste, health hazards, etc.) in each of the regions which could be impacted by the WMP. Some of the issues and concerns were related to the human health, water quality, environmental issues, land, socio-economic impacts of waste management, increased charges for waste collection as a result of new waste system, bad waste management, sustainability, emissions, lack of data and study research, environmental protection activities, better access and transparency of control and monitoring, international and European standards to be considered within in the Waste Management Plan (WMP) and strategy, separated waste collection, environmental projects to be included in educational systems of the schools, lack of monitoring, waste sorting, absence of laboratories etc. All of the issues raised were discussed and considered by experts, and will be included for further elaboration in the final drafts of the SEA report.

## Participants of Public Consultation Meetings

The following participants were engaged in the SEA consultation meetings in 4 regions and in Yerevan city. Stakeholders include representatives of NGOs which are actively engaged in environmental topics, and were able to raise appropriate concerns related to the WMP. Municipality representatives of each region were also engaged in the discussions, representatives of different departments, Environmental, Agricultural, Urban Development, chief specialists and experts were also able to raise their concerns and draw relevant feedback and recommendations on Scoping report.

The list of stakeholders:

### ***1. Kotayk Region, Hrazdan city***

“Hrazdan Aarhus Centre” coordinator

“Civil Academy” NGO director

“Healthy Environment” NGO director

Hrazdan Municipality representatives from the Departments of Environment,

Hrazdan Municipality representatives from Department of Agriculture,  
Hrazdan Municipality representatives from Department of Urban Development.

## **2. Lori Region, Vanadzor city**

“Vanadzor Aarhus Centre” representatives

Vanadzor Municipality representatives, including from the Department of Environment and Agriculture

Chief specialists of Lori Municipality

## **3. Shirak Region, Gyumri City**

“GeoFon” NGO director

“Civil Voice” NGO director

Chief Specialist of Environmental Department of the Shirak Municipality, RA

“BioSofia” NGO

“Aarhus Centre” of Gyumri

“Civil Voice” NGO

Municipality representatives

## **4. Syunik Region, Kapan City**

“Zangezour” NGO

“Kapan Aarhus Centre” Coordinator

Municipality representatives

## **5. Yerevan City**

“For Sustainable Human Development” NGO director

“EcoLur” NGO director

“Yerevan Aarhus Centre” coordinator

“For the Nature” NGO

Yerevan Municipality representatives





SEA Scoping Report Public Consultation in Kapa, Syuniq

## **Responses and Clarifications on the comments and questions raised at the Public Consultation Meetings**

**Q = Questions/Concerns, R = Recommendations, F=Feedback**

*Note: The overview below is very useful. I would suggest to include it in the SEA report with further explanation how the comments have been considered in SEA report (or WMP)*

*Gyumri Public Hearings, August 11, 2016*



Q: "Civil Voice" NGO Director Mr. Arsen Vardanyan expressed his concern regarding to the planned landfill construction in Benjamin Village near the historic archaeological site located in the vicinity of the predetermined area. They suggested conducting some site research in the area prior to carrying out any construction works to prevent any possible threats of damaging the ancient historical archeological area.

F: The team members assured that the area will be researched further, and will be considered in the process of SEA finalization. The issue should be passed to the Ministry of Territorial Administration for further clarification.



Public hearing of SEA Scoping report on Waste Management Plan, Gyumri

Team Leader Nune Harutyunyan is responding to the feedback raised by stakeholders

R: Gyumri Aarhus Centre representative, Mr. Gevorg Petrosyan suggested developing a waste management policy documents and strategies at the national level indicating the appropriate strategies /priorities prior to the adaptation and implementation of any projects related to waste management.

F: UNECE SEA team leader Ms. Nune Harutyunyan accepted the importance of the issue raised by Mr. Petrosyan and assured that it will be included in the recommendations list for further discussion.

R: Regarding his concern about the impact of landfills on the climate change, Mr. Petrosyan offered doing estimations which will show the possible increase of emissions and take appropriate measures.

Q: Environmental Department Chief Specialist of RA Shirak Municipality Mr. Tigran Ananikyan and the leading specialist of the same department Ms. Seda Tumanyan were concerned about the possible increase of garbage collection fees related to the construction of 5 new landfills in the regions and introduction of new garbage collection system.

F: SEA expert on Climate Change and Air Pollution, Mr. Manucharyan addressed to the question and said that according to the research the fees for garbage collection services will possibly increase 5-6

times, and in the future they will decrease eventually due to the improvement of the sectoral work and investments, better coordination and as a result of more efficient work of responsible agencies. He also said that it is important to do monitoring on waste sorting.

R: RA Shirak Municipality representatives offered setting differentiated fees for garbage collection for different social sectors; business sector can pay much higher service fees than the low-income social class.

R: Representative of ‘Advisory Research Center’ NGO, Mr.Gharib Harutyunyan suggested to include monitoring data on SWM services in the report which is currently being undertaken by their NGO.

R. Nune Harutyunyan, SEA Team Leader, REC Caucasus, has suggested that the NGO provides their fresh data and it can be placed as a supplementary information on public service quality in the report or supplementary info as an annex to the Scoping report.

Q: Another issue was raised by Mr. Gevorg Petrosyan about existence of a laboratory in the republic which would examine the harmful impacts of hazardous emissions from the plastic bottles production process.

A: Ms. Nune Harutyunyan said that the issue will be introduced to the representative of the Ministry of Health of RA.

F: UNECE SEA team leader Ms. Nune Harutyunyan addressed to Mr. Petrosyans` concern assuring that the issue raised by him will be introduced to the corresponding representatives of the Ministry of Health of Armenia in charge of this type of issues.

F: All the concerns, issues raised, recommendations and suggestions that were introduced during the Gyumri SEA Public Hearings were assured by the team members and SEA national experts to be introduced into the SEA final report in a separate section on stakeholders’ feedback. It was agreed that the recommendations be included in the report as soon as they are finalized and approved.

## ***Hrazdan Public Hearings, 5 August, 2016***

Q: The head of Urban Development Department for Housing and Infrastructures Mr. Aram Virabyan introduced the Waste Management Plan of the Kotayk region, which is already being implemented in the region and expressed his concern about whether the discussed program will contradict or support the Waste Management Plan in Kotayk region.

F: As an answer to Mr. Virabyan`s question, the project team represented the differences between the two projects and the fact that the Kotayk Waste Management Program is included in the general Waste Management Program, thus there can be no contradiction between the two.

Q: Participants' main concern was that the project will result in increasing fees charged for waste collection, which will increase the already large burden on the low-income social class.

A: The team members addressed to the question and said that according to the research the fees for waste collection services will increase 5-6 times in recent years, and in the future they will decrease eventually due to the improvement of the sectoral work and investments, as a result of more efficient work.

F: The project implementation team accepted the raised concern about the possible increase of fees charged in the future.

Q: Hrazdan Aarhus Centre Director Ms. Anahit Mnatsakanyan, "Healthy Environment" NGO Director Mr. Ashot Ohanyan and other participants were also curious about the issues related to the establishment of sanitary landfill zones, management and control, as well as about issues related to the environmental protection.

F: Experts and project team took the issue into consideration: it will be discussed and, in case of being approved by the team, will be included in the SEA report.



*Public hearings on Scoping Report in Hrazdan*

### *Vanadzor Public Hearing, 9 August, 2016*

Q: The Head of Agriculture and Environmental Department of RA Lori Municipality Mr. Artak Demirchyan expressed his concern about the use of agricultural lands for landfill construction purposes. He noticed the issue to be an urgent concern and needs to be addressed in this respect.

Q: There was a question by the Head of Agriculture and Environmental Department of Lori Municipality of RA, Mr. Demirchyan about the quantities of landfills to be constructed.

F: The question was answered by the team members, who mentioned that 5 landfills are planned for construction.

Q: Chief specialist of the Department of Urban Development of Lori Municipality, Ms. Nune Khachatryan raised a concern related to the fact that in the Waste Management Plan relevant data on Spitak, Tashir and Stepanavan cities is missing, while they also need to be taken into consideration in the implemented studies because in the mentioned cities the solid household waste will possibly leave some impact on the lifetime of the landfill and generated garbage volumes. It was also suggested to make some changes in the Waste Management Plan (WMP) by prolonging the period of landfill operation from 20-25 years by increasing the landfill volume.

Q: The meeting participants raised the issue of possible fee increases as a result of new landfill construction in 5 sites of Armenia, and, thus suggested to review this issue and come up with clever solutions to avoid from increasing the already large burden of low-income social classes of the population.

F: Project implementation team accepted the raised concerns and recommendations. Experts and project team assured that all the issues will be discussed and considered during the further work.

## *Yerevan Public Hearings, 19 August, 2016*

R: Representative of Health Department of the Yerevan Municipality Ms. Zarine Gedelyan made suggestion on newly constructed Nubarashen Landfill about plastic waste separation since this practice it is not being used currently within the waste management in Yerevan

R: Recommendations were also made by the Yerevan Municipality representatives for considering application of international and European standards on waste sorting/separation in the Waste Management Plan (WMP) strategy..

R: The Head of Development and Investment Programs Department of Yerevan Municipality, Ms. Nune Sukiasyan also suggested to conduct studies on possible tariff increases and implement economic estimations, develop financial mechanisms through an integrated approach.

F: ‘‘For Nature’’ NGO coordinator Mr. Hamlet Smoyan mentioned that economic mechanisms should also be elaborated to help in developing the ‘‘green economy’’.

F: In relation to the discussion topic on ‘‘green economy’’ UNECE SEA team leader, Ms. Nune Harutyunyan introduced to the participants one of the ongoing projects in Armenia which is ‘‘Resource Efficient and Cleaner Production’’ RECP project which, among other goals, is aimed at promoting the ‘‘green’’ mentality of business organizations, by reducing the hazardous emissions and waste within SMEs, promoting more resource efficient use, waste management, better production process control, environmental safety, etc. The participants of the meeting showed their interest in gaining more background on the project by obtaining some materials. Ms. Nune Harutyunyan mentioned that the information on the project can be found in the website of the project in Armenia.

R: Monitoring in the landfills is missing everywhere in Armenia. Taking this issue into consideration, there was a suggestion to carry out monitoring and collect relevant data and results which will help later implementation of sectoral management.

R: ‘Chairman of “For Sustainable Human Development” Karine Danielyan mentioned that there are issues related to the coordination and supervision in the waste sector which is one of the reasons why the waste management system in Armenia is lacking in many ways. She suggested to take those issues into consideration. She also has mentioned that UN 17 goals to transform our world, which Armenia has already joined, and those obligations are a good start for improving waste management strategies, public participation and consideration of environmental and health impact through SEA for all strategic documents and national policies. She has also mentioned that waste management, knowledge on these type of studies, like Scoping reports, should also be available for educational institutions and students. R: The Specialist of Environmental Department, Ms. Diana Grigoryan and the representative of Architecture and Urban Development of Yerevan Municipality Ms. Lusine Mkrtychyan recommended including educational programs in the educational system of schools enabling children to develop environmental behavior from early ages and to obtain environmental, ecological elementary knowledge.

R: There was a recommendation by the Yerevan Aarhus Center coordinator, Ms. Silva Avagyan to take measures to prevent the household and industrial wastes from being intermixed.





Yerevan Public Consultations – Scoping Report

F: The project implementation team and the experts accepted all the issues raised and submitted them for further discussion by appropriate authorities.

## Summary

All public consultations meetings resulted in understanding the main concerns and issues presented within the SEA Scoping report and WMP, those can be included in the further policy and strategy development for the WMP in relation to SEA, as well as considered by the national and international SEA experts for further consideration and feedback in the SEA report. Participants were people representing their communities, people who are well-informed on the main threats, problems and other issues of their communities, interested parties and stakeholders. Thus the recommendations gathered here overall shows the present situation of Armenia and the most important issues that need to be considered in final Strategic Environmental Assessment (SEA) report.

Annex 1: Announcement on Public Hearings

Հայտարարություն<sup>2</sup>

Հայաստանում ԿԿԹԿ ոլորտի Ռազմավարական զարգացման ծրագիր, Ճանապարհային քարտեզ և Երկարաժամկետ ներդրումային ծրագրի Ռազմավարական էկոլոգիական գնահատում փորձական ծրագիրը նախնական գնահատման հայտի վերաբերյալ: Կովկասի տարածաշրջանային բնապահպանական կենտրոն հիմնադրամը՝ ՀՀ բնապահպանության նախարարության և ՄԱԿ-ի Եվրասիական Տնտեսական Հանձնաժողովի հետ համատեղ իրականացնում է «Հայաստանում ԿԿԹԿ ոլորտի Ռազմավարական զարգացման ծրագրի, Ճանապարհային քարտեզի և երկարաժամկետ ներդրումային ծրագրի» Ռազմավարական էկոլոգիական գնահատման ծրագիրը:

*Շրջակա միջավայրի վրա ազդեցության գնահատման և փորձաքննության մասին ՀՀ օրենքի 21.06.2014թ. 20-110-Ն համաձայն, ինչպես նաև ՀՀ կառավարության 19.11.2014թ. N 1325-Ն որոշման հավելվածի 3-րդ գլխի 31-րդ մասով սահմանված կարգով 2016թ. օգոստոսի 5-ին, ժամը 11.00-ին ՀՀ Կոտայքի մարզպետարանում, օգոստոսի 9-ին, ժամը 12-ին ՀՀ Լոռու մարզպետարանում, օգոստոսի 11-ին, ժամը 12-ին ՀՀ Շիրակի մարզպետարանում, օգոստոսի 16-ին, ժամը 11-ին ՀՀ Սյունիքի մարզպետարանում, օգոստոսի 19-ին, ժամը 12-ին Երևանի քաղաքապետարանում տեղի կունենան ծրագրի նախնական գնահատման հայտի, և փորձագետների կողմից մշակված ՌԷԳ մեկտեղման զեկույցի նախագծի հանրային քննարկումները: Գրավոր դիտողությունները և առաջարկությունները կարող եք ներկայացնել ծանուցումից հետո 15 աշխատանքային օրվա ընթացքում: Փաստաթղթերին կարելի է ծանոթանալ ԿՏԲԿ հայաստանյան գրասենյակի՝ [www.rec-caucasus.am](http://www.rec-caucasus.am) պաշտոնական կայքէջում:*

<sup>2</sup> <http://rec-caucasus.am/1232-2/?lang=hy>