

Environmental and Social Monitoring Report

Project Number: 54293-001

Semi-annual Report for the period from July to December 2025

January, 2026

ARM: HEALTHCARE QUALITY IMPROVEMENT PROGRAM (Financed by the ADB)

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CURRENCY EQUIVALENTS

(as of 20 January - 2026)

Currency unit	–	Armenian dram (AMD)
AMD 1.00	=	\$ 0.0026
\$1.00	=	379.21 AMD

ABBREVIATIONS

ADB	–	Asian Development Bank
AP(s)	–	Affected Person(s)
ATDF	–	Armenian Territorial Development Fund
CC	–	Construction Contractor
DC	–	Design Company
DLI	–	Disbursement-Linked Indicator
EA	–	Executing Agency
EMP(s)	–	Environmental Management Plan(s)
E&S	–	Environmental and Social
EARF	–	Environmental Assessment and Review Framework
GRM	–	Grievance Redress Mechanism
HCF	–	Health Care Facility(ies)
HPIU	–	Health Project Implementation Unit
HQIP	–	HealthCare Quality Improvement Program
IR	–	Involuntary Resettlement
LARF	–	Land Acquisition and Resettlement Framework
MOH	–	Ministry of Health

OHS	–	Occupational Health and Safety
PAP	–	Project action plan
RA	–	Republic of Armenia
SAEMR	–	Semi-Annual Environmental Monitoring Report
SDDR	–	Social Due Diligence Report
SEIA	–	State Environmental Impact Assessment
SPS	–	Safeguard Policy Statement (ADB, 2009)

NOTE(i) In this report, "\$" refers to United States dollars .

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1. Introduction

This First Semi-Annual Environmental Monitoring Report (SAEMR) has been prepared within the framework of the “HealthCare Quality Improvement Program” (HQIP) in accordance with the requirements of the ADB Safeguard Policy Statement (SPS 2009) for the Health Quality Improvement Program. The report covers the July–December 2025 reporting period and presents the progress of program implementation, the status of E&S safeguard measures, environmental monitoring activities, identified issues, and opportunities for improvement.

The objective of the Program is to support the RA Government in improving the quality of healthcare services. The Program supports ongoing reforms in the healthcare sector through infrastructure development, strengthened management capacities, and the institutionalization of quality measurement and accountability mechanisms. The intended outcome is a measurable improvement in service quality, supported by the availability of climate-resilient, gender-responsive, and inclusive healthcare facilities, enhanced organizational and service delivery capacities, and established systems for quality monitoring and accountability.

As of December 2025, construction contracts for 19 ambulatories have been signed and site preparation, initial construction works have commenced. E&S screening has been completed by Armenian Territorial Development Fund (ATDF) for all facilities included in the current implementation phase.

2. Institutional Arrangements

The Ministry of Health (MoH) of the Republic of Armenia (RA) is the Executing Agency (EA) and Implementing Agency (IA) for all outputs under the Program. In relation to implementing Output 1 of the Program, the MoH will exercise its functions through HPIU and ATDF. The HPIU will have an overall coordinating role; it will collate inputs from across all divisions, consolidate reports and submit periodic progress reports on Disbursement-Linked Indicator (DLI) achievements and on Project action plan (PAP) activities. The ATDF will act as Co-Implementing Agency under the Program being responsible for the construction (rehabilitation) of health facilities including tendering of construction works under Output 1.1 (DLI3).

The MOH as the EA will have overall Program oversight and steering responsibility. This includes preparing, implementing, and financing all LAR tasks and cross-agency coordination and linkages. In relation to implementing Output 1 of the Program, the MOH will exercise its functions through HPIU and ATDF. All LAR-related tasks will be implemented through ATDF.

The HPIU will be responsible for: (i) the design of health facilities; (ii) organizing public consultations meetings assisted by Consultants and LSGBs during the design

preparation stage and assisting the ATDF in organizing public consultations meetings and participating thereof during the construction stage; (iii) assisting in settlement of individual complaints during the design and construction stages by participating in the resolution process as a member of the Grievance Review Committee; (iv) ensuring proper internal monitoring (consolidated monitoring/progress reports regarding design and equipment components of Output 1 implementation, etc.) and disclosure of its results.

The ATDF as a Co-Implementing Agency under the Program will be responsible for the adapting the standard design to the specific location, implementation, monitoring, and administration of every activity including the management of E&S safeguards including the land acquisition and resettlement related tasks, immediate oversight and monitoring of physical civil works. The ATDF shall ensure that all the Program activities undergo an environmental impact assessment/ due diligence up to the level prescribed for ADB environment category B, and the environmental and health & safety considerations are incorporated into detailed design, drawings, and technical specifications, Environmental Management Plans (EMPs) are prepared, and their costs are included in BoQs. The monitoring of the implementation of mitigation measures set in the EMP as well as the reporting will be the responsibility of the ATDF safeguard staff allocated for the Program.

One Environmental Specialist and one social specialist under the E&S department of ATDF are assigned to the Program.

3. Program Description

Within the framework of the Program, the environmental and involuntary resettlement (IR) safeguard requirements of the ADB (SPS, 2009) have been applied. The Program has been classified as Environmental Category “B”, as its potential impacts are site-specific, temporary, and manageable through the implementation of appropriate mitigation measures.

The Program is co-financed by the Government of the RA and the ADB and is implemented under a results-based lending modality. The Program aims to improve the quality of health care in Armenia. It supports important developments and reforms in Armenia’s health sector. The outcome of the Program is the quality of care improvements demonstrated, and the key outputs are

- (i) climate- and gender-responsive and inclusive health facilities for quality health services delivered,
- (ii) capacity and organization for quality of care strengthened, and
- (iii) quality of care measurement and accountability institutionalized.

The Program is aligned with the GoA Program 2021-2026, the Health Sector Strategy 2023-2026, the Concept Note for Universal Health Insurance, the Quality-of-Care Strategy 2022-2026, and the Primary Health Care Action Plan (July 2022).

Having nationwide coverage, the Program will be implemented over a period of four years.

Three types of health facilities will be supported under the program, which include

- (i) ambulatories,
- (ii) polyclinics, and
- (iii) regional medical centres.

At least 24 health facilities will be constructed/reconstructed under the Program.

4. Environmental and Social Instruments and Requirements

The Program is implemented in accordance with the requirements of the ADB (SPS, 2009). Based on the safeguard screening conducted during project preparation, the Program has been classified as Category B for Environmental and Social Safeguards, indicating that potential environmental impacts are site-specific, temporary, and can be effectively mitigated through the implementation of appropriate environmental management measures.

An Environmental Assessment and Review Framework (EARF) was prepared for the Program during the project preparation stage by an individual consultant in September 2025 under Project No. 54293, which was agreed with the ATDF. The EARF provides guidance for environmental screening, assessment, and management of subprojects implemented under the Program.

Environmental impacts are anticipated for the Program activity under output 1.1, related DLI 3: “(i) By 2028, at least 24 health care facilities are rehabilitated, or constructed and equipped, meeting criteria for climate change mitigation and adaptation, inclusive design and gender responsiveness”. These comprise physical civil works that will cause moderate adverse environmental impacts typical for upgrading and constructing small- to medium-sized buildings. Physical works will involve construction and rehabilitation of medium-sized health facilities, the medical center, polyclinics, and ambulatories— with an average size of 11,000; 1,568 and 305 square meters (m²) respectively, and serving about 200,000 people in total. Having nationwide coverage, the Program will be implemented over a period of four years.

The negative environmental impacts of the civil works are largely localized within construction sites, site-specific, short-term in nature, and limited to the construction period. They include: (i) generation of waste during demolition of existing buildings and construction, potentially including material containing asbestos; (ii) dust, emissions, and localized atmospheric air pollution; (iii) wastewater discharge, which could cause minor contamination of soil and waterbodies; (iv) increased noise and vibration that creates a

nuisance for neighbouring houses and residents; (v) impact on roads and traffic; and (vi) occupational and community health and safety risks. The impacts are effectively mitigated through the application of standard construction and operation management practices.

The total construction footprint of the ambulatory facilities does not exceed 1,500 sq. m, and the area of paved/impervious improvements does not exceed 1,000 sq. m. Consequently, the working design documentation for these ambulatory facilities is not subject to State Environmental Impact Assessment (SEIA).

The Program has been categorized as category B for Environment and IR. The Program is not expected to cause physical or economic displacement. No permanent/temporary IR impacts are envisaged, as the Program intends to either reconstruct (or rehabilitate) the existing health facilities at the exact sites (locations) where they were built or, if new facilities are to be built, to screen the sites (using the IR Screening Checklist) and prepare Social Due Diligence Report (SDDR) confirming the absence of IR impacts, excluding any sites with confirmed/expected potential for IR impacts. It is strictly restricted to use private and community-owned land for the program needs. This approach will minimize IR and impacts on private and community-owned property, if any. However, with no specific program site areas being identified at the Program preparation stage, no due diligence process initiated based on the Detailed Design, and no SDDR prepared to confirm the absence of the IR impacts, the Program was classified to IR category B, and the corresponding Land Acquisition and Resettlement Framework (LARF) was prepared by an individual consultant during the Project preparation period in coordination with HPIU and ATDF. The LARF was approved in September 2025.

5. Project Contracts and Management

The MOH will act as the EA for all outputs under the Program. The HPIU and the ATDF will act as Co-Implementing Agencies for the Output 1.1 DLI 3. ATDF will be in charge of management of tenders for construction and civil works of health care facilities. The output 1.1 activities will be shared between the above entities as follows: the HPIU will undertake the task of design (tender/design management) and equipment (tender/procurement/equipment supply management) and ATDF will be responsible for construction and rehabilitation of Health Care Facilities (HCFs), as well as E&S compliance during the construction works.

5.1 Design preparation and approval of Ambulatories

The modular design for ambulatory healthcare facilities was prepared by a licensed design company (DC) (“Yerankyun Project” LLC) contracted by HPIU.

The design received a positive conclusion from the State urban expertise (on 25 February 2025), confirming compliance with applicable construction regulations, sanitary and hygienic standards, seismic safety requirements, and environmental considerations.

The design documentation includes:

- architectural and structural design
- engineering systems (electricity, water supply, wastewater management, heating, ventilation, communication and fire safety systems)
- construction organization plan
- cost estimates.

Particular attention was given to energy efficiency, climate resilience, environmental protection, accessibility for persons with disabilities, and gender-responsive design.

The construction organization plan defines the sequence of construction activities, site organization, logistics arrangements, occupational health and safety (OHS) requirements, and emergency response measures.

Site-specific adaptation of the modular design is carried out by the construction contractor(CC) through a contracted DC, ensuring that the design complies with local site conditions while maintaining E&S safeguard requirements. The construction contractors and supervision contractors are listed in Appendix 2.

5.2 Construction Contracts Management

Construction works are implemented by contractors selected through competitive procurement procedures conducted by ATDF. Contractors are responsible for executing civil works in accordance with approved design documentation and contractual E&S safeguard requirements.

Design companies are responsible for site adaptation of the approved modular designs to the specific conditions of each construction site. Contractors sign contracts with the designers for the preparation of site-adapted design documentation.

Technical supervision companies conduct daily supervision of construction activities, ensuring quality control and compliance with contractual obligations, including environmental and OHS requirements.

Environmental compliance is monitored through periodic site visits conducted by E&S specialists of ATDF. During this visits E&S specialists verify the implementation of environmental mitigation measures and ensure compliance with the requirements of the EMPs.

As of the reporting period, construction contracts for all medical ambulatories have been signed, and works are being implemented by different contractors under the supervision of independent technical supervision companies. The list of facilities, contractors, supervision companies, and construction status is presented in Annex 2.

6. Activities Undertaken During the Reporting Period

During the reporting period of July-December 2025, the following key activities were carried out:

- Tendering and signing of contracts with construction contractors, See Appendix 2;
- Initiation of design adaptation and construction works of ambulatories;
- Involvement of E&S specialist of the ATDF in project implementation aimed at strengthening E&S safeguards oversight;
- Preparation of the E&S screening reports for project sites by ATDF E&S staff.

7. Design Integration with Environmental and Social Safeguard Standards

During the preparation of the modular design for ambulatory healthcare facilities, E&S safeguard considerations were incorporated into the design process in accordance with the ADB SPS (2009) and applicable national regulations.

Particular attention was given to environmental protection, energy efficiency, climate resilience, gender-responsive and inclusive accessibility, as well as ensuring safe and efficient operation. This approach aims to minimize potential adverse E&S impacts during both the construction and operation phases. The design package to be adjusted to the site includes the following:

- Architectural and structural design;
- Engineering networks and systems (including power supply, water supply and wastewater management, heating, ventilation and air conditioning, communication, and fire alarm systems);
- Cost estimates;
- Construction organization plan.

The construction organization plan defines the phasing and technological sequence of construction activities, site layout and organizational schemes, procedures for managing the movement of materials and machinery, and the overall construction schedule. It also incorporates requirements for OHS, community health and safety, emergency response measures, and risk management arrangements.

The design solutions stipulate that, during the site-specific adaptation stage, the Contractor must ensure that the project is tailored to the unique conditions of each construction site while fully complying with the approved E&S requirements, as well as the limitations and procedures outlined in the ADB safeguard documents.

The responsibility for adapting the design to the specific construction site rests with the Construction Contractor (CC), in accordance with the contract concluded between the CC and the ATDF. The CC engages a DC to carry out the site-specific adaptation works, ensuring that the modular ambulatory facility can be efficiently implemented while accommodating local site conditions.

8. Changes in Project Scope and Safeguard Implications

During the reporting period, no changes were made to the scope of Program activities, design concepts, or implementation arrangements that would affect E&S safeguard requirements. All activities continued to be implemented in accordance with the approved Program design, Environmental Assessment and Review Framework (EARF), and ADB SPS (2009).

9. Environmental Safeguard Compliance

To ensure compliance with ADB and national environmental requirements, the following safeguard activities were implemented in the reporting period:

- E&S screening conducted for 19 ambulatories included in the Program;
- Establishment and operation of a Grievance Redress Mechanism (GRM) during construction phase.

During the reported period the E&S screening was conducted for 19 ambulatory facilities (Ambulatories are listed in appendix 1) included in the Program and implemented across Tavush, Ararat, Armavir, Aragatsotn, Shirak, Gegharkunik, Kotayk, Lori, and Syunik regions, in accordance with the approved E&S Screening Checklist. The screening results confirmed that none of the reviewed ambulatory sites are located in or adjacent to environmentally or socially sensitive areas, and no potential environmental, social, land acquisition, or livelihood-related risks were identified. No involuntary land acquisition, restrictions on land use, physical or economic displacement, or unresolved community grievances were identified for any of the screened facilities. Based on the screening outcomes, all 19 ambulatory facilities were considered eligible for financing under the Program.

9.1 Construction Waste Management

Construction waste generated during civil works activities is managed in accordance with national environmental regulations and contractual environmental requirements. Contractors are responsible for ensuring proper collection, temporary storage, transportation, and disposal of construction waste generated at the sites.

Waste management measures implemented during construction include:

- ✓ segregation of construction waste at the site where feasible;
- ✓ provision of designated waste containers for temporary storage of construction debris;
- ✓ regular removal of waste from construction sites to licensed municipal disposal locations;
- ✓ prohibition of uncontrolled dumping or burning of construction waste;
- ✓ maintenance of good housekeeping practices to prevent accumulation of waste on site.

During the preparation of site-specific EMPs detailed construction waste management procedures will be further defined, including responsibilities, waste disposal arrangements, and monitoring requirements.

10. Environmental Monitoring

10.1 Environmental Monitoring Results

This SAEMR covers July-December 2025 period and summarizes the environmental monitoring activities conducted during construction works under the project. The monitoring focuses on assessing compliance with environmental protection measures, occupational and community health and safety requirements, and good construction practices.

During the reporting period (on 5th November), a mission of the ADB was conducted with the participation of an ATDF environmental specialist. During the mission, representatives visited several project sites (Dvin, Aygestan, and Dimitrov). The representatives paid attention to compliance with E&S standards, particularly the presence of information boards and warning signs, the proper demarcation of trenches, the availability of recycling bins, and sanitary and hygienic conditions at the construction sites. In addition, several design-related issues were discussed with the implementing agency.

10.2 Qualitative and Quantitative Monitoring Data

Environmental monitoring is conducted through site inspections, visual observations, and review of construction practices was carried out at all 19 project sites.

Site-specific EMPs are under preparation and will be finalized after completion and confirmation of environmental screening for the subprojects. Until the EMPs are finalized, environmental monitoring is conducted based on contractual environmental requirements, applicable national regulations, and environmental good practice.

Environmental monitoring during the reporting period was conducted through regular site inspections and visual observations of construction activities and site conditions.

Monitoring activities were carried out jointly by E&S specialists of ATDF, technical supervision companies, and contractors' site representatives.

Daily supervision of construction activities, quality control, as well as monitoring compliance with E&S measures, is carried out by the technical supervision companies. During the reporting period, regularly monitoring site visits (typically once per month) were conducted by E&S specialists of ATDF to ensure compliance with E&S standards.

Monitoring activities were carried out in accordance with the environmental monitoring approach defined in the EARF and applicable national regulations. Monitoring methods included site inspections, visual observations and photographic documentation by ATDF E&S specialists, technical supervision companies, and contractors' site representatives. Photographic documentation is attached to the annexes of this report – Appendix 1.

The E&S parameters were monitored according EARF Monitoring checklist (Appendix 4).

The monitoring results presented in the table indicate that environmental and OHS measures were generally implemented across all 19 construction sites. Minor issues were identified during site inspections, mainly related to dust suppression, temporary waste accumulation, use of personal protective equipment (PPE), and fencing of construction areas. These issues were typical for construction activities and did not result in significant environmental or safety risks.

Table 1. Summary of Environmental and OHS Monitoring Results

Monitoring Parameter	Number of Sites Inspected	Issues Identified	Status
Dust suppression	19	7	Corrected
Waste management	19	3	Corrected
PPE compliance	19	4	Corrected
Site fencing	19	5	Corrected

The monitoring results indicate that construction activities generally comply with the environmental protection requirements set by national legislation of the RA and the environmental management provisions included in the construction contracts. Environmental conditions observed during site inspections were within acceptable limits for construction activities and consistent with the environmental good practice standards reflected in ADB's environmental, health, and safety guidelines.

10.3 Corrective actions

The monitoring activities during the reporting period identified several minor non-compliances related to dust suppression, waste management, and PPE use, as summarized in Table 2. Corrective actions were promptly communicated to the

responsible contractors and technical supervision teams. Water spraying for dust suppression was increased immediately where needed, additional waste containers were provided at selected sites (Aygestan, Dvin, Jrarat), and safety briefings were reinforced to improve PPE compliance. Implementation of these actions has been closely monitored by ATDF E&S specialists and technical supervision staff. While most corrective actions have been fully implemented, ongoing supervision is continuing for PPE compliance to ensure consistent adherence to safety protocols. Overall, the timely identification and corrective measures have effectively mitigated potential environmental and occupational health risks, contributing to safer and more environmentally responsible construction practices.

Table 2. Summary of corrective actions

Issue	Location	Action Required	Responsible	Status of implementation
Insufficient dust suppression	Several sites	Increase water spraying during dry weather	Contractor	Immediate
Temporary waste accumulation	Several sites	Provide additional waste containers	Contractor	Completed
PPE use inconsistent	Several sites	Reinforce safety briefing and supervision	Contractor & Supervision	Completed

During the July–December 2025 reporting period, no unanticipated environmental impacts or high-risk situations were observed at any of the 19 construction sites. Monitoring inspections confirmed that construction activities remained within the expected E&S risk profile identified in the EARF.

10.4 Summary of Monitoring Outcomes

Monitoring results during the reporting period indicate that construction activities across all 19 project sites were generally in compliance with E&S standards of the RA and the environmental good practice standards reflected in the ADB EHS Guidelines. Minor non-compliances were observed, including improper removal of construction waste from the site, insufficient use of water spraying for dust suppression, etc. for which corrective actions were applied. The monitoring findings confirm that environmental impacts associated with the construction activities remain localized, temporary, and manageable

through the application of standard mitigation measures. No significant environmental impacts or high-risks situations were identified. No accidents or incidents were reported during the reporting period.

11. Social Safeguards Monitoring

11.1. Social Safeguards Requirements

Social safeguards monitoring is conducted in accordance with the ADB SPS (2009) and applicable national legislation. The project aims to avoid or minimize adverse social impacts, including (IR) and impacts on vulnerable groups.

Key requirements include impact screening, preparation and implementation of safeguard documents (if applicable), stakeholder consultations, functioning of the GRM, timely compensation to affected persons (Aps), and regular monitoring and reporting.

The ATDF is responsible for ensuring compliance to the Project LARF and ADB SPS and addressing any identified issues through corrective actions.

The Project LARF document details mechanism, procedures, and compensation entitlements to be applied in the planning and implementing Land Acquisition and Resettlement (LAR) tasks.

11.2. Objectives and Scope of Social Monitoring

(i) Objectives

The main objective of social monitoring is to ensure that project implementation complies with the social safeguards requirements of the ADB SPS, Project LARF and relevant national legislation. Social monitoring aims to assess the effectiveness of mitigation measures, identify any unforeseen social impacts, and ensure that affected people are adequately informed, consulted, and compensated where applicable.

(ii) Reports Tracking

Reports tracking is conducted to systematically monitor the preparation, submission, and review of social safeguard documents and reports. This includes internal monitoring reports, semi-annual social monitoring reports, grievance redress records, and other relevant documentation. The tracking process ensures that all reports are submitted in a timely manner, meet ADB requirements, and accurately reflect the current status of project implementation. It also helps identify delays, gaps, and areas requiring corrective actions.

12. Methodology behind IR Monitoring and summary of monitoring outcomes

The methodology for monitoring social impacts is based on a combination of multiple approaches. Data is collected through field visits, site observations, consultations with affected persons (if any) and stakeholders, and review of project documentation. The monitoring process includes verification of safeguard implementation, assessment of compliance with approved plans, and evaluation of the effectiveness of mitigation

measures. Grievance records are regularly reviewed to identify recurring issues and ensure timely resolution. The findings are documented and used to recommend corrective actions where necessary.

The IR safeguards monitoring was carried out in accordance with the approved project documents and the requirements of the ADB SPS 2009. Project activities were confined to existing boundaries and did not involve land acquisition, physical or economic displacement, or any impacts on livelihoods.

Based on monitoring results and due diligence conducted during implementation, no involuntary resettlement impacts, as per SPS 2009, were identified. Accordingly, no compensation, resettlement, or livelihood restoration measures were required.

Ongoing monitoring confirms that the project continues to be fully compliant with applicable ADB social safeguard requirements.

13. Implementation procedures

Grievance Redress Mechanism

A GRM, established in line with ADB policies and guidelines, is maintained throughout the entire Program cycle—from pre-construction and design to construction and operation—to receive feedback, concerns, and complaints from affected persons (Aps), including those related to environmental issues. The GRM ensures a transparent, accessible, and timely process for registering and resolving grievances, involving the complainants, Contractor, ATDF, DC, HPIU, and MOH, without limiting the APs' right to seek judicial or administrative remedies.

The person affected by the Project (AP) can raise suggestions/ concerns/ complaints first to the Contractor's dedicated grievance staff, so an attempt will be made to resolve complaints at the local level. To maintain transparency and accountability to affected communities and to make information, assistance and grievance resolution services accessible to the APs, the construction contractors have established on-site GRM activities:

- Project boards/ posters containing information on field office location, contact information, including phone numbers, regular mail and email addresses, etc.).
- Field office.
- Grievance register logbook kept in the field office.
- Dedicated grievance redress staff.
- Designated telephone line and e-mail address.

APs can approach Contractor's representative (construction foreman, engineer, social or environmental specialist) on-site and/ or register the suggestion /complain into the grievance register logbook kept by Contractor at the field office established nearby the

construction site. Should the issue be out of Contractor's responsibility and competence, Contractor shall forward the issue to ATDF, if not satisfied, the AP can apply to the MOH via lodging the complaint within two weeks after receiving/not receiving the response from the Contractor. The ATDF or MOH/HPIU shall inform the complaint within 2 days of acknowledging receipt and shall respond to the application within 30 days. If the AP is not satisfied with the ATDF's or HPIU's resolution of his/her complaint, then the complaint can be lodged with the GRC.

Information on the GRM is communicated to local communities and other stakeholders through announcements, and is also disclosed on official websites and on project information boards at the construction sites.

During the reporting period no grievances or complaints related to environmental or social issues were registered through the GRM mechanism.

14. Example of good practice and opportunities for improvement.

During the reporting period, E&S management measures at the construction sites were implemented in accordance with the requirements of the contractual obligations, and applicable national E&S regulations.

Site inspections confirmed that contractors generally followed the E&S mitigation measures specified in the EARF. These included the implementation of dust suppression measures during earthworks, site fencing, proper management of construction waste, safety signage and use of PPE by workers.

No additional or innovative E&S management practices beyond those required by the EARF were identified during the reporting period. E&S activities were primarily focused on ensuring compliance with the mitigation measures and good construction practices defined in the project safeguard documentation.

Opportunities for improvement were identified in several areas to further strengthen OHS and community health and safety measures. In particular, the demarcation and secure fencing of excavated or otherwise hazardous areas at construction sites should be reinforced to prevent unauthorized access and reduce risks to both workers and the local community. Enhanced on-site supervision and regular inspections by both the contractor and technical supervision organizations are recommended to ensure ongoing compliance with safety protocols.

Additionally, capacity building activities for contractor staff and site supervisors should be expanded, focusing on hazard recognition, safe work practices, emergency response procedures, and effective community engagement. These measures will contribute to improving overall site safety, minimizing potential risks, and fostering a culture of proactive environmental, health, and safety management throughout the construction period.

In addition to the training sessions, after the development of the EMPs, CCs will be provided with guidance materials and tools developed under other ADB funded Programs. These materials will serve as practical reference guides to support the effective

implementation and management of OHS, environmental, and community safety measures on site, ensuring consistency with established procedures and best practices.

Summary and recommendations. Overall, the monitoring results indicate that E&S management practices at the construction sites are generally satisfactory and consistent with the requirements of the project safeguard framework and national legislation.

For the next monitoring period, it is recommended to follow E&S measures, support continuous improvement in environmental, health, and safety performance during the implementation of construction activities.

15. Training and Capacity Building

During the reporting period, trainings and awareness-raising sessions were also conducted in ATDF office for contractors and TSC staff on environmental protection and OHS issues.

The meeting was organized by the ATDF E&S team. During the meeting main topics of the discussion, emphasizing the importance of compliance with E&S standards at construction sites were presented. The importance of organizing such meetings, discussions, and periodic training sessions to ensure that E&S standards are implemented effectively and comply with the requirements set by national legislation and donor organizations was emphasized.

Armine Gabrielyan, Environmental Specialist at ATDF, delivered a presentation on environmental protection and OHS management during the construction of ambulatories. She emphasized the importance of complying with safety regulations, protecting workers' health, and implementing sanitation, fire prevention, and environmental sustainability measures throughout the construction process.

The list of topics is presented in Appendix 3:

16. Focus of the Next Monitoring Period

The next E&S monitoring report will cover the period January–June 2026. Monitoring activities will focus on continued supervision of construction activities, implementation of EMPs, strengthening OHS practices, and ongoing environmental training for contractors and supervision staff.

Based on the monitoring experience during the reporting period, continued emphasis will be placed on strengthening site safety management, dust suppression practices, and waste management. Additional awareness-raising activities for contractors and supervision staff will also be implemented to further improve environmental and OHS performance.

17. Annexes

Appendix 1. Photos of the active construction sites



Information board and warning signs are installed(Aygestan MA)/ Shahart LLC and Blesk LLC Consortium/



Project design discussion at the Aygestan MA construction site during the ADB mission/ Shahart LLC and Blesk LLC Consortium/



Personal protective equipment, Dimitrov MA construction site /Shahart LLC and Blesk LLC Consortium/



Visit of ADB representatives to the Dimitrov MA construction site /Shahart LLC and Blesk LLC Consortium/



Thermal insulation of walls (Vardanashen MA)/ Kankarshin LLC and Art Plast LLC/



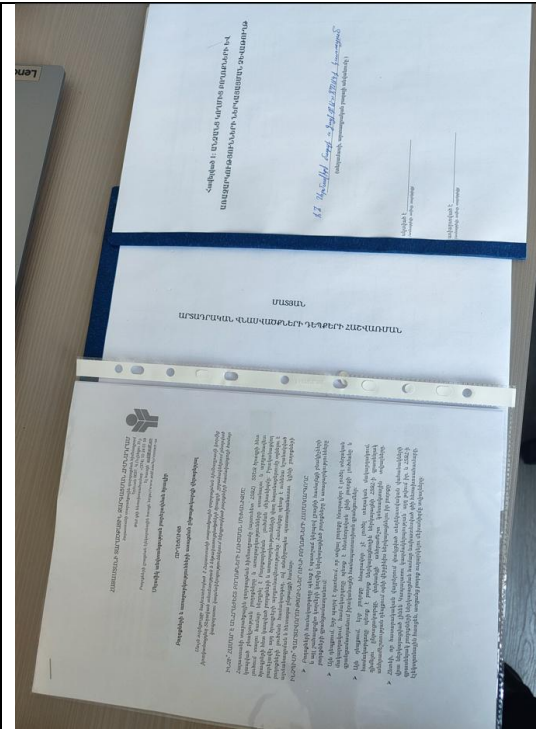
Information board, warning signs and fire extinguisher are installed(Gay MA)/ Ela Shin LLC and Lilanarm LLC/



Roof construction works(Vardanashen MA)/ Kankarshin LLC and Art Plast LLC/



Installation of heating boilers (Akhurik MA)/ Lenchanshin LLC/



GRM log (GAY MA)/ Ela Shin LLC and Lilanarm LLC/



Personal protective equipment (GAY MA)/Ela Shin LLC and Lilanarm LLC/



Personal protective equipment (Aygestan MA)/ Shahart LLC and Blesk LLC Consortium/



First-aid kit (Gay and Jrrat MAs) /Ela Shin LLC and Lilanarm LLC /



Recycle bins at construction sites(Gay and Jrrat MAs) /Ela Shin LLC and Lilanarm LLC/

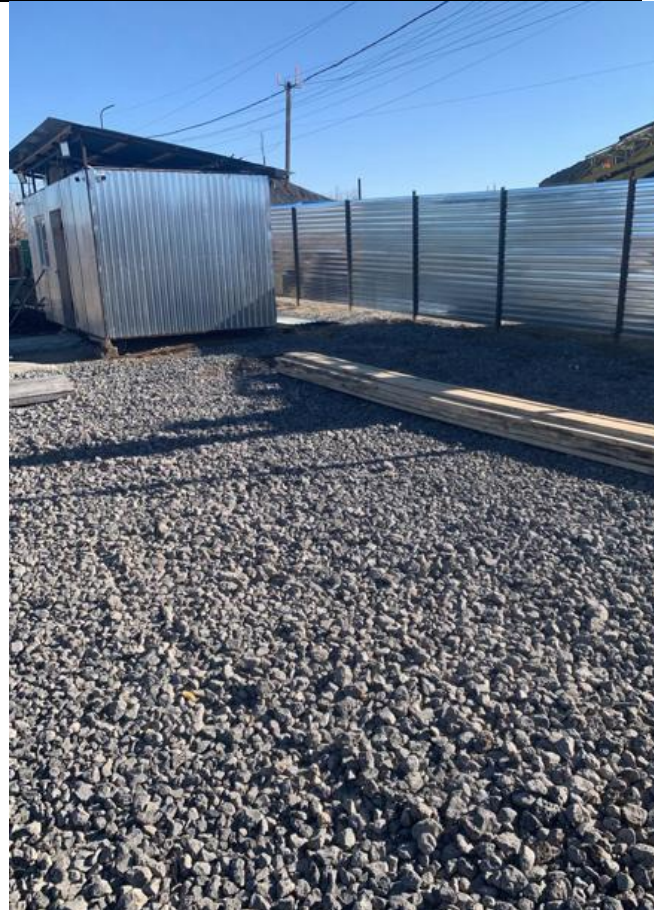


Personal protective equipment (DVIN MA)/
Shahart LLC and Blesk LLC Consortium/

Personal protective equipment, Jrrat MA,/
Ela Shin LLC and Lilanarm LLC/



Sanitation place availability in construction site, Lenughi MA/ Lilanarm LLC/



Paving works, Lenughi MA/ Lilanarm LLC/

Appendix 2. List of the medical ambulatories

N	Medical Ambulatory	Region	Technical Supervision	Construction Contractor	Contract Date	Status of construction
1	Koghb MA	Tavush	Miqnar LLC	Amiraghyan Universal Group LLC and Khachmichshin LLC	12.06.2025	Ongoing
2	Dimitrov MA	Ararat	Cottage LLC & Arame LLC	Shahart LLC and Blesk LLC Consortium	19.06.2025	Ongoing
3	Aygestan MA	Ararat	Cottage LLC & Arame LLC	Shahart LLC and Blesk LLC Consortium	19.06.2025	Ongoing
4	Dvin MA	Ararat	Cottage LLC & Arame LLC	Shahart LLC and Blesk LLC Consortium	19.06.2025	Ongoing
5	Gay MA	Armavir	Arame LLC	Ela Shin LLC and Lilanarm LLC	19.06.2025	Ongoing
6	Jrarat MA	Armavir	Arame LLC	Ela Shin LLC and Lilanarm LLC	30.06.2025	Ongoing
7	Voskevaz MA	Aragatsotn	Arame LLC	Ela Shin LLC and Lilanarm LLC	30.06.2025	Ongoing
8	Vardanashen MA	Armavir	Arame LLC	Kankarshin LLC and Art Plast LLC	16.06.2025	Ongoing
9	Tandzut MA	Armavir	Arame LLC	Kankarshin LLC and Art Plast LLC	16.06.2025	Ongoing
10	Khanjyan MA	Armavir	Arame LLC	Kankarshin LLC and Art Plast LLC	16.06.2025	Ongoing
11	Pemzashen MA	Shirak	Agea LLC	Goharik LLC	10.06.2025	Ongoing

12	Akhurik MA	Shirak	Agea LLC	Lenchanshin LLC, M. Lambaryan LLC, Akhuryan Coopshin LLC, Elite Arman Shin LLC (JV)	10.06.2025	Ongoing
13	Tsakqar MA	Gegharkunik	Techno shin LLC	Hayk En Norik LLC and Europa LLC, Gaysat LLC and Hydrogeoshin LLC Consortium	16.06.2025	Ongoing
14	Dzoraghbyur MA	Kotayk	Arame LLC	Avag Shin 1 LLC, Yeghvardshin OJSC and Transuniversal CJSC Consortium	16.06.2025	Ongoing
15	Getahovit	Tavush	Arame LLC	Dustr Margarita LLC and Zet Profil LLC	16.07.2025	Ongoing
16	Metsavan MA	Lori	Irtig LLC	Asphalt Construction LLC, Artezia LLC and Blesk LLC	16.07.2025	Ongoing
17	Angeghakot MA	Syunik	Armstroy LLC	Asphalt Construction LLC, Artezia LLC and Blesk LLC	16.07.2025	Ongoing
18	Vahagni MA	Lori	Irtig LLC	Olimp Shin LLC and Lilanarm LLC Consortium	11.08.2025	Ongoing
19	Lenughi	Armavir	Irtig LLC	Lilanarm LLC	04.08.2025	Ongoing

Appendix 3. Training Agenda and Topics Covered

Training Title: Environmental Protection and Health and Safety Management in Construction

Organized by: Armenian Territorial Development Fund

The training covered key environmental, health, and safety requirements applicable during construction activities, with particular attention to ambulatory construction projects. The following topics were presented and discussed:

No.	Topic
1	Introduction to environmental protection and occupational health and safety in construction
2	National and international laws for the construction norms and safety regulations applicable to construction sites
3	Organization and management of construction sites
4	Environmental protection during construction works
5	Worker safety instructions, OHS requirements
6	Sanitary facilities and hygiene conditions for workers
7	Management of hazardous materials and wastes (e.g., asbestos, oils, fuels)
8	Workplace safety measures
9	Questions and answers

Photos of trainings



Appendix 4. MONITORING CHECK LIST

MITIGATION COMPLIANCE & INSPECTION MONITORING

Project: Gay Medical Ambulatory

Implementing Agency: Armenian Territorial Development Fund

Scope of Inspection: Environmental, Social and OHS Monitoring

Contractor: “Ela Shin” LLC and “Lilanarm” LLC

Weather Condition: Sunny

Attendees: Armine Gabrielyan, Environmental specialist

Meri Abrahamyan, Social Specialist

Date: 17 December 2025

Monitoring visit was carried out with the presence of Contractor’s and Technical Supervisor representative:

<Permits/ approvals obtained						
Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation Implemented Yes/No/NA	Responsible entity	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved/outstanding actions required)
Environmental Assessment Report (EIA)		Conclusion on Environmental Expertise available	NA			
Dump sites		Permission for disposal of waste available	Yes	Ela Shin LLC and Lilanarm LLC		
Tree cutting		Permission on tree cutting available	NA			
CONSTRUCTION STAGE						
WORK SITE: General						
Environmental management: environmental team, health& safety, emergency, trainings, grievance redress mechanism						

Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation on Implemented Yes/No/NA	Mitigation Effective* 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
<i>Environmental team</i>						
All activities	1.	Person in charge on environmental/ health & safety management is appointed and is present on-site	Yes	5		

Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation on Implemented Yes/No/NA	Mitigation Effective 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
Management measures						
All activities	2.	Any use of land outside the healthcare facility footprint including camps and parking sites is excluded	Yes	5		
All activities	3.	Tree cutting is implemented in accordance with permission. Other trees and vegetation are properly protected.	NA			
Health & safety						
All activities	4.	Warning signs, fencing and exclusion barriers erected around all open pits and work site areas	Yes, the worksites are fenced, warning signs are installed	5		
Excavation works	5.	Open pits are backfilled within reasonable time. Unnecessary	Yes	5		

		open pits are not detected				
All activities	6.	Access of strangers and outsiders (especially children) is excluded	Yes	5		
All activities	7.	Workers are provided with and are using the uniform and applicable personal protection equipment (PPE) for site conditions	Yes	5		
Dismantling of asbestos-containing material	8.	Workers dealing with hazardous materials are using the special protective equipment and follow the Guidelines on ACM	NA, No ACM identified at the site			
All activities	9.	Board with information on project and implementing agencies is installed	Yes	5		
All activities	10.	Sanitary-hygienic conditions for workers are provided: drinking and washing water supply, mealtime utilities, toilets, rest time, etc.	Yes	5		
All activities	11.	First aid kit is available on-site and is accessible to all workers.	Yes	5		

All activities	12.	Fire extinguisher available	Yes	5		
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Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation Implemented Yes/No/NA	Mitigation Effective 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
All activities	13.	Dark time illumination is available	Yes	5		
<i>Emergency Response Plan</i>						
All activities	14.	Person in charge on emergency management is appointed and is present on-site	Yes	5		
All activities	15.	Copy of ERP and emergency contact list are available, updated and posted in a visible place at all work sites	Yes	5		
All activities	16.	Accident report maintained	Yes	5		
<i>Trainings and orientation courses</i>						
All activities	17.	Workers briefed on EIA/ EMP at time of starting employment	Yes	5		

All activities	18.	Workers briefed on ERP at time of starting employment	Yes	5		
All activities	19.	Workers receive introductory job- focused safety trainings before starting work; training event is properly registered in the instructions' book	Yes	5		
<i>Work site cleanliness</i>						
All activities	20.	The work site kept clean from debris, garbage, etc.	Yes	5		
All activities	21.	Bins for garbage collection are installed	Yes	5		
<i>Public communication and grievance redress mechanism: environmental issues</i>						
All activities	22.	Meeting with APs on construction activities, environmental impacts and mitigation measures held	Yes	5		
All activities	23.	Register of complaints maintained, Complains observed during the last visit ad- dressed	NA, No complaints were registered during the reporting period.			

Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation on Implemented Yes/No/NA	Mitigation Effective* 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
All activities	24.	Healthcare facility management and people are notified on inconveniences: water, electricity breaks, etc.	Yes	5		
<i>Environmental parameters: Dust control</i>						
Earth works, material delivery, removal of generated waste	25.	Trucks are operating using covers	Yes	5		
	26.	Construction sites watered	NA, The site visit was conducted in December; due to weather conditions, water spraying was not required.			

	27.	Equipment and haul vehicles are fitted with effective emission control equipment	Yes	5		
<u>Noise control</u>						
Operation of machinery	28.	Construction noise levels are acceptable at closest sensitive receptor	Yes	5		
	29.	Equipment fitted with effective silencers	Yes	5		
	30.	managed by restricting operating hours	Yes	5		
<u>Vibration control</u>						
Operation of machinery	31.	managed by reducing time exposed to vibration,	Yes	5		
<u>Runoff control:</u>						
All activities using liquid materials	32.	Spillages are managed properly	Yes	5		
Earth works	33.	Sediment laden runoff is prevented	Yes	5		
Earth works, material delivery, removal of existing pavement, asphalt pavement	34.	Drains are kept open and water bodies are not blocked by sediment	Yes	5		

All activities using machinery	35.	Tires of trucks are cleaned before leaving the construction site footprint and entering the roads	No, During the site visit, it was observed that there was no designated area for cleaning truck tires	0		
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Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation Implemented Yes/No/NA	Mitigation Effective* 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
Earth works	3 6.	Excavated waste is either hauled from work site or is retained temporary on-site in spoil dumps	Yes	5		
Construction waste management						
Removal of construction waste	3 7.	Construction waste is disposed of in approved sites	Yes	5		
Earth works, demolition of structures, dismantling of utilities	3 8.	Non-hazardous waste (excavation material, rocks, concrete and metallic parts, etc.) is managed in accordance with EMP	Yes, While the EMP had not yet been developed, waste management was carried out in accordance with good environment	5		

			tal practices			
Dismantling of structures	39.	Hazardous waste (including asbestos- containing waste) is managed in accordance with ERP	NA, No hazardous or asbestos-containing waste was identified.			
Use of chemicals, fuel, lubricants, etc. while all activities	40.	Leakages and liquid waste, contaminated soil is managed in accordance with ERP	Yes	5		
<i>Dump sites</i>						
Use of territory	41.	All permits and SMP for the use of, dump sites are available	Yes	5		
Use of territory	42.	SMP for the site use is available	Yes	5		
Use of territory	43.	The use of the site is in accordance with SMP	Yes	5		
POST- CONSTRUCTION STAGE: DLP						
<i>Site re-instatement and rehabilitation (including dump sites)</i>						
All activities	44.	All the waste and material are removed from the site The site is clean	NA, Construction works are ongoing.			
All activities	45.	All machinery is removed from	NA, Constructio			

		the site	n works are ongoing.			
All activities	46	Trees (shrubs and other vegetation) are planted and maintained	NA, Construction works are ongoing.			

Construction Activity		Mitigation Measure (as per PAR/EMP)	Mitigation Implemented Yes/No/NA	Mitigation Effective 1 to 5	Corrective Action Request (CAR) including deadline for effective CA.	Resolution Status of previous CAR (resolved / outstanding actions)
OPERATION STAGE						
Healthcare facility operation- 47	.	The contract with licensed company for hazardous medical waste handling is available by the end of DLP.	NA			
Healthcare facility operation- 48	.	The contract with licensed company for e-waste handling or the hand-over agreement with State Property Management Committee	NA			

Mitigation effective summary ¹					
Fully compliant		Partly compliant		Non-compliant	
Totally	% to applicable items	Totally	% to applicable items	Totally	% to applicable items
37	97.36%	0	0%	1	2.63%

¹ NA items are excluded from the calculation of mitigation effectiveness summary