Republic of Armenia, 2023

MSG review of the outcomes and impact of the EITI

Contents

[Introduction 1](#_Toc57973524)

[Part I: Relevance of EITI implementation 2](#_Toc57973525)

[Work plan (Requirement 1.5) 2](#_Toc57973526)

[Monitoring progress 3](#_Toc57973527)

[Innovations and impact 4](#_Toc57973528)

[Part II: Public debate 6](#_Toc57973529)

[Open data (Requirement 7.2) 6](#_Toc57973530)

[Outreach and communications (Requirement 7.1) 6](#_Toc57973531)

[Part III: Sustainability and effectiveness 9](#_Toc57973532)

[Part IV: Stakeholder feedback and MSG approval 10](#_Toc57973533)

# Introduction

Regular disclosure of extractive industry data is of little practical use without public awareness, understanding of what the figures mean, and public debate about how resource revenues can be used effectively. The EITI Requirements related to outcomes and impact seek to ensure that stakeholders are engaged in dialogue about natural resource revenue management. EITI disclosures lead to the fulfilment of the EITI Principles by contributing to wider public debate. It is also vital that lessons learnt during implementation are acted upon, that recommendations from EITI implementations are considered and acted on where appropriate and that EITI implementation is on a stable, sustainable footing.

The multi-stakeholder group may use this template to monitor the outcomes and impact of EITI implementation. Where information is already available elsewhere, it is sufficient to include a link to other publicly available documentation. The scope of this template reflects EITI Requirement 1.5 on work plan and Requirements 7.1 to 7.4 on outcomes and impact.

The MSG is required to review the outcomes and impact of EITI implementation annually (Requirement 7.4). The MSG is encouraged to update this document annually to monitor progress, keep track of efforts to improve data accessibility and inform work planning.

To inform Validation, the MSG is required to submit the completed form to the International Secretariat Validation team by the Validation commencement date. The period captured in this review may be the period since the previous Validation or the previous calendar/fiscal year. The MSG should clearly indicate the period covered by its review.

The MSG’s annual review of the outcomes and impact of EITI implementation should be publicly available, and stakeholders beyond MSG members should have an opportunity to provide feedback on the EITI process (Requirement 7.4).

# Part I: Relevance of EITI implementation

## Work plan (Requirement 1.5)

MSG’s self-assessment:

**Fully met**

The objective of this [requirement](https://eiti.org/eiti-standard-2019) is to ensure that the annual planning for EITI implementation supports implementation of national priorities for the extractive industries while laying out realistic activities that are the outcome of consultations with the broader government, industry and civil society constituencies. The annual EITI work plan should be a key accountability document for the MSG vis-à-vis broader constituencies and the public.

**1. Basic information about the current EITI work plan.**

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| Period covered by the current EITI work plan | **2020-2023** |
| Information on how the public can access the work plan. | The Work Plans are available [here](https://www.eiti.am/en/eiti-work-plan/). |
| Process for producing the current EITI work plan | The 2022 EITI Revised Work Plan was [approved](https://www.eiti.am/en/agenda-protocols-other-related-documents) at the MSG meeting on April 27, 2022.  The 2023-2024 draft Work Plan was presented for feedback to the MSG members on March 3, 2023, regarding which considerations were submitted. The 2023-2024 Work Plan was [approved](https://www.eiti.am/en/agenda-protocols-other-related-documents) at the MSG meeting on June 29, 2023. |
| MSG approval of the work plan | **27.04.2022**  **29.06.2023** |

**2. Explain how the work plan’s objectives reflect national priorities for the extractive industry. Provide links to supporting documentation, such as studies or national development plans, if available.**

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| Yes, the EITI National Priorities were reflected in the Work Plan activities. They were discussed in the working and the MSG meetings, as a result of which the draft Work Plans were developed. The draft Work Plans were then circulated among the MSG members, and amended according to the received comments and considerations, after which they were [approved](https://www.eiti.am/en/agenda-protocols-other-related-documents/) at in-person meetings or electronically.  In the RA [Strategy](https://mtad.am/pages/entrail-programs?slug=entrail-programs) for the Development of the Mining Sector, adopted in 2023, as well as in accompanying studies, the EITI implementation in Armenia was presented as an important step towards the transparency and accountability of the sector and strong side. The EITI reports and data were used in the [analyses](https://mtad.am/pages/entrail-programs?slug=entrail-programs) based on which the Strategy was developed.  The preparation activities of the EITI annual reports were included in the Five-Year [Action Plans](https://www.gov.am/am/Five-Year-Action-Program/) of the RA Government.  The importance of the EITI implementation in Armenia was emphasized by high-ranking officials at public events, e.g., at the annual [conferences](https://www.eiti.am/en/eiti-armenia-4th-annual-conference-december-2022) of the EITI Armenia. |

*3. Optional question: Has the MSG developed a theory of change on how EITI implementation will address the identified challenges of the sector in your country? If yes, please reference the corresponding document here.*

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| No theory of change was developed. |

## Monitoring progress

**4. Provide an overview of activities undertaken in the period under review and progress in achieving the objectives of the previous work plan**. The MSG is encouraged to provide a summary here and to document progress in more detail in the work plan itself.

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| *[Summarise progress in implementing the previous work plan. Provide a link to the previous work plan with a more detailed analysis of progress in undertaking planned activities and achieving each objective or attach it to this submission.]*  The EITI Work Plans are available [here](https://www.eiti.am/en/eiti-work-plan/).  The overview of the EITI current activities and works was recorded in the Quarterly/Semi-annual and Annual [Progress Reports](https://www.eiti.am/en/Quarterly-annual-reports/) on EITI Implementation, which present the progress and outcomes of each activity of the Work Plans in detail. The semi-annual EITI progress 2022 reports were approved at the MSG meeting held on June 29, 2023.  The information about the activities implemented within the framework of EITI was published on the website of EITI Armenia. Thematic pages related to the EITI implementation and the mining industry were also created on the website of EITI Armenia. |

## Recommendations from EITI implementation (Requirement 7.3)

MSG’s self-assessment:

**Fully met**

The objective of this [requirement](https://eiti.org/eiti-standard-2019) is to  ensure that EITI implementation is a continuous learning process that contributes to policy-making, based on the MSG regularly considering findings and recommendations from the EITI process and acting on those recommendations it deems are priorities.

**5. Provide an overview of the multi-stakeholder group’s responses to and progress made in addressing the recommendations from EITI reporting and Validation and gaps in information in accordance with Requirement 7.3.**

The multi-stakeholder group is required to list each recommendation and the corresponding activities that have been undertaken to address the recommendations and the level of progress in implementing each recommendation. Where the government or the multi-stakeholder group has decided not to implement a recommendation, it is required that the multi-stakeholder group documents the rationale.

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| **Recommendation:** | **Status/progress:** |
|  | *[Has the recommendation been partly or fully addressed? How is the MSG following up on the recommendation? Has the MSG identified an agency or actor responsible for addressing the recommendation? If the MSG has decided not to implement the recommendation, please document the rationale.]* |
| Recommendations regarding the technical and legal improvements of the EITI electronic reports submitted by the subsoil-using companies and state bodies, which were presented by the independent administrator in the EITI 2020-2021 national report. | It should be noted that the presented recommendations mainly refer to the improvement of the process of data reconciliation and use. Those will be included and addressed in 2023-2024 within the scope of the development of the electronic system of systematic disclosure. The ToR of the system has already been approved by the MSG on June 29, 2023 meeting. IT solutions for specific issues will be proposed by the winner IT company. If the solutions are acceptable by the MSG, the necessary legislative changes will also be made. |
| Access to data about legal participants (legal owners) of closed joint-stock companies. | The issue was discussed with the stakeholders and dicision had been made to resolve the issue within the scope of the works of development of systematic data disclosure platform to be created in 2023-2024. |
| Expediency of publication of the contracts for the subsoil geological study for the mineral extraction. | At the MSG meeting held on 27.04.2022, the question of the expediency of publishing the contracts for the geological study of the subsoil for the purpose of mineral extraction was discussed. The competent authorities presented the content of the geological study contracts and noted that they lack provisions on financial obligations. As a result, the MSG decided that these contracts are not significant from the EITI point of view. At the same time, it was noted that in case of further legislative changes on the matter, the MSG will revert to the issue again. |
| Improvement of the legislation ensuring the implementation of environmental targeted programs. | As a result of legal improvements, starting 2021 targeted environmental projects can be implemented by the affected communities of all metal mining companies. In addition, clear legal requirements for the transparency and accountability of environmental programs and their performance have also been set for the communities. |
| Allocations to affected communities from collected royalties. | According to the amendments to a number of legal acts adopted in 2022, starting 2024 2 percent of the royalties paid by companies will be deducted in favor of the affected communities (settlements) in order to finance projects and activities aimed at socio-economic development. |
| Legal and procedural improvements of the socio-economic obligations to communities set in the subsoil use contracts. | According to the results of data reconciliation in the EITI reports, the MSG and the authorized bodies recorded the gaps related to the fulfillment of the socio-economic obligations set in the subsoil use contracts to be contributed by the companies to the communities and the record keeping of these payments by the communities. The authorized body is currently working on the correction of legal gaps regarding contractual socio-economic obligations, including within the framework of the implementation of the new mining industry strategy. The proposed drafts will also be discussed on the MSG platform. |
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**6. How have lessons learned from EITI implementation informed the current work plan?**

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| The current Quarterly/Semi-annual and Annual [Progress Reports](https://www.eiti.am/en/Quarterly-annual-reports/) on EITI Implementation, which were discussed and approved by the MSG members, were considered during revisions of the Work Plans, as they best introduced the issues, obstacles, and needs which were encountered in the EITI implementation process. The current Work Plan was developed based on the matters which were recorded in the Reports. |

## Innovations and impact

**7. Summarise any steps taken by the MSG to exceed EITI Requirements in a way that addresses national or local extractive sector governance priorities**.

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| 1. It was important for the capacity building of the stakeholders in the sector to use and analyze the disclosed data of EITI that in addition to publishing the 2016-2021 EITI Reports in the online reporting system[[1]](#footnote-1) on the website of EITI Armenia, filtering[[2]](#footnote-2) and automatic graphics[[3]](#footnote-3) generation tools were introduced on that platform, which can help to study the disaggregated financial and economic data of the sector in a visible and didactic way, to compare them with the data of previous years and analyze them, when necessary.  2. Since 2021 Armenia collectes and publishes information about beneficial ownership online on the State Register of Legal Entities in structured and open data format. These data are published according to Beneficial Ownership Data Standard (BODS) and ensure data interoperability, easy reuse, and high quality. Armenia is considered to be one of the first countries to apply the BODS of Open Ownership in collecting beneficial ownership data.  <https://www.eiti.am/en/news/2020/12/04/eiti-armenia-is-testing-the-bo-online-declaration-platform/101>  <https://www.eiti.am/hy/%D4%BB%D5%8D-%D5%B0%D5%A1%D5%B5%D5%BF%D5%A1%D6%80%D5%A1%D6%80%D5%A1%D5%A3%D5%A5%D6%80/?tab=88>  <https://www.e-register.am/en/companies/1340197/declaration/c51e08a7-6fdb-4ab7-a55c-c74a68a8f54c>  <https://www.openownership.org/en/blog/upscaling-the-use-of-beneficial-ownership-data-in-armenia/>  <https://www.openownership.org/en/blog/armenia-and-latvia-become-first-countries-to-publish-data-in-line-with-the-beneficial-ownership-data-standard/>  <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2022/02/24/upscaling-the-use-of-beneficial-ownership-data-in-armenia/121/>  <http://www.foi.am/en/bot/item/2365/>  3. As a result of the MSG activities, the RA Government decided to increase the transparency of mining contracts. In addition to the mining contracts in the metal mining sector published since 2018, non-metallic minerals extraction contracts have also been published since 2021.  <https://www.eiti.am/en/news/2020/06/18/non-metallic-minerals-extraction-contracts-eng/85>  <https://www.eiti.am/en/open-mining-contracts>  4. Within the framework of the World Bank’s “Armenia Extractive Industries Transparency Initiative Support, Additional Financing” grant project, the EITI Armenia will establish and launch an IT system for systematic data disclosure. The Terms of Reference were provided to the MSG members and approved by MSG on June 29, 2023. A call for tender is planned following the relevant approvals. |

**8. What kind of outcomes and impact have these measures resulted during the period under review?**

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| *[Explain how the MSG tracks outputs, outcomes and impact and include link(s) to any relevant documents. Summarise the outcomes and impact of efforts to ensure that EITI implementation addresses national or local extractive sector priorities. If the MSG has documented this elsewhere, please provide a link to relevant documents. Outcomes and impact can be disaggregated by constituency or beneficiary group, if relevant.]*]  1. The experience of using the analytical tools of the EITI reporting platform was also considered in developing the Terms of Reference for the systematic data disclosure system, which is considered an EITI national priority. The future system will also be equipped with analytical tools. As a result of the implementation of these activities, public awareness, engagement, and oversight regarding the governance of the metal mining sector will undergo qualitative improvements.  2. Since September 1, 2021, the RA Government has expanded the framework of companies which have obligation to declare beneficial owners, and starting from January 1, all legal entities and non-commercial organizations registered in Armenia submit BO declarations. BO data are published in line with the requirements of the Beneficial Ownership Data Standard (BODS) and provide public awareness and oversight opportunities.  <https://www.eiti.am/file_manager/EITI%20Documents/Beneficial%20Ownership/BO_disclosures_amendments_Guideline_for_mining_sector_EITI_national_secretariat_03.06.2021.pdf>  <https://www.eiti.am/en/news/2021/06/23/who-is-the-beneficial-owner-the-national-assembly-of-ra-adopted-the-package-of-laws-on-disclosure-o/108>  <https://www.eiti.am/hy/%D4%BB%D6%80%D5%A1%D5%AF%D5%A1%D5%B6-%D5%BD%D5%A5%D6%83%D5%A1%D5%AF%D5%A1%D5%B6%D5%A1%D5%BF%D5%A5%D6%80%D5%A5%D6%80%D5%AB-%D5%A2%D5%A1%D6%81%D5%A1%D5%B0%D5%A1%D5%B5%D5%BF%D5%B8%D6%82%D5%B4/>  <https://www.openownership.org/en/blog/armenia-and-latvia-become-first-countries-to-publish-data-in-line-with-the-beneficial-ownership-data-standard/>  3. About 350 non-metallic minerals extraction contracts have been published since 2021, providing broader transparency in natural resources management.  <https://www.e-gov.am/gov-decrees/item/34230/>  <https://www.eiti.am/en/news/2020/06/18/non-metallic-minerals-extraction-contracts-eng/85>  4. In June 2022, the World Bank published a feature story[[4]](#footnote-4) entitled “[Armenia’s Journey Towards Responsible Mining](https://www.worldbank.org/en/news/immersive-story/2022/06/13/armenia-s-journey-towards-responsible-mining)” about the path taken by Extractive Industries Transparency Initiative (EITI) Armenia, which was described as a “success story” by the World Bank.  5. "EcoLur" information NGO has implemented the project "Responsibility of non-operating mining companies in the EITI process". Within the framework of the project, the activities of 19 mining companies that have subsoil use permits, but do not implement or partially implement subsoil use as well as the developments around the Gladzor polymetallic mine were studied. 21 reports[[5]](#footnote-5) were prepared, as well as a film[[6]](#footnote-6) was shot, which are published on the "Independent Expert Assessments" page and the "Film" page of the www.ecolur.org website. The reports were presented to the members of the members of EITI Armenia MSG in order to get their position. Inquiries regarding the non-operation of mines were sent to the companies with subsoil use permits, the Ministry of Territorial Administration and Infrastructure. A letter has been sent to the Ministry of Environment. The letters were published at https://www.ecolur.org/. EcoLur visited 26 communities and settlements affected by the mining industry, informed the local population and local governments about the subsoil user's responsibility to the community, stipulated by the RA legislation, the obligations assumed by the subsoil user and the related process of the EITI process, distributed information leaflets in the communities, which contained information about the companies obligations under the law and EITI, the environmental and socio-economic obligations undertaken by the companies under the subsoil use contracts, conducted surveys among the local governments and the population to find out their relations with the subsoil users, about the fulfillment of the obligations assumed under the subsoil use contract, about their knowledge about the EITI, to collect proposals. The results of the surveys were summarized in reports and news articles.  Within the framework of the "Social-Ecological Responsibility" project, Ecolur with the NGO partners developed and published a tool-form[[7]](#footnote-7) for the assessment of the socio-physical and environmental condition of the RA communities Vardenis, Martuni, Syunik, Goris, Akhtala, Odzun. There are also data of subsoil users published within the EITI framework, obligations assumed by subsoil use contracts and proposals.  6. As a result of the mining sector policy dialogue and discussions the American University of Armenia Center for Responsible Mining published[[8]](#footnote-8) summary documents and policy briefs on working conditions and occupational safety in the mining sector, disaster resilience of the affected communities, mitigation of the negative environmental legacy of mining, and responsibility of the industry in terms of the natural environment and public health.  7. The AUA Center for Responsible Mining launched an online information platform[[9]](#footnote-9) on the mining industry that provides civil society, media, academics, government, and the private sector access to the industry statistics, exploration and mining permits, reports, scientific research, analyses, laws, and maps. |

**8. If the MSG has plans to include new issues or approaches to EITI implementation, please describe these**.

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| In accordance with the EITI National Priorities and 2021-2022 Work Plan, during the [MSG meeting](https://www.eiti.am/en/agenda-protocols-other-related-documents/) on April 27, 2022, the MSG made a decision to start the implementation of systematic disclosures.  The system will be developed with the support of the World Bank’s “Armenia Extractive Industries Transparency Initiative Support. Additional Financing” grant project provided to the RA Prime Minister's Office, and the works will be underway in 2023-2024. An IT consultant was hired for development of the systematic disclosure system Terms of Reference. The latter was approved by the MSG meeting on June 29, 2023.  The company that wins the tender will implement the activities provided for in the Terms of Reference. An inter-agency working group will be formed to coordinate the implementation of the activities, including, if necessary, the preparation of relevant legislative amendments. The group will consist of data responsible officials of authorized state bodies, representatives of the body responsible for the digitization of the state information systems, as well as members of the MSG constituencies.  [*EITI Work Plans*](https://www.eiti.am/en/eiti-work-plan)  [*EITI Progress Reports*](https://www.eiti.am/en/Quarterly-annual-reports) |

**9. What kind of outcomes and impact are these plans expected to result in?**

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| The transition to the systematic disclosure system of the EITI data implies introduction of a system for automatically publishing the most recent information through the electronic systems of the bodies that own the data. This will help to have an access to the mining industry data required by the EITI Standard in real time or more timely manner, build awareness for a larger audience of stakeholders in the unified platform, and provide wider analytical opportunities to all interested parties. The launch of a systematic disclosure platform will also allow changing the nature and content of the EITI Reports, focusing them primarily on examining substantive issues in the sector and submitting recommendations, thus increasing the role and social benefits of the EITI. |

**10. Summarise the MSG’s efforts to strengthen the impact of EITI implementation in the period under review, including** **any actions to extend the detail and scope of EITI reporting or to increase engagement with stakeholders. The MSG is encouraged to document how it has taken gender considerations and inclusiveness into account.**

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| At the [MSG meeting](https://www.eiti.am/en/agenda-protocols-other-related-documents/) on June 3, 2020, MSG decided to include the scoping study to discuss an opportunity to expand the scope of EITI Armenia in the Terms of Reference of the Independent Administrator preparing the 2019 Third National EITI Report of Armenia. In particular, the Independent Administrator preparing the Third EITI Report of Armenia was responsible for studying the sectors of mineral water extraction and metallic mineral resources processing (including the activities of local companies, engaged in the purchase and sale of minerals and alloy), assessing the need to further incorporate these new industries in subsequent reports of EITI Armenia (within the scope of EITI), as well as drafting legal acts, which would ensure the submission of EITI Reports for the expanded sector (sectors).  According to the above-mentioned Terms of Reference, the Independent Administrator, namely, Grant Thornton, prepared the required Scoping Study, where it studied the mentioned sectors and assessed their significance in Armenia's economy, considering the requirements of the EITI Standard. [The Scoping Study](https://www.eiti.am/en/scoping-studies) was published on the official website of EITI.  The conclusions resulting from the Study were presented and discussed during the workshop in Tsaghkadzor on July 24-26, 2021, which was attended by the MSG members, as well as representatives of authorized bodies and partner organisations. The MSG members and representatives of authorized bodies agreed with the results and conclusions of the Scoping Study, according to which the expansion and implementation of EITI (scope) for the mentioned sectors were not considered to be expedient, primarily due to the current small share of these sectors in the economy and insignificant income flows to the State. |

# Part II: Public debate

## Open data (Requirement 7.2)

MSG’s self-assessment

**Fully met**

The objective of this [requirement](https://eiti.org/eiti-standard-2019) is to enable the broader use and analysis of information on the extractive industries, through the publication of information in open data and interoperable formats.

**11. Open data policy and disclosures**

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| Provide a link to the open data policy agreed by the MSG (Requirement 7.2.a)  *Yes, the MSG is guided by the “Open Data Policy”* [*approved*](https://www.eiti.am/en/agenda-protocols-other-related-documents/) *by the latter on December 6, 2017.* | *[Add link(s) to relevant open data policy(ies) and any commentary.]*  https://www.eiti.am/en/agenda-protocols-other-related-documents/ |
| Is EITI data available in open data format and publicised? (Requirement 7.2.b)  Yes | *[EITI data refers to disclosures within the scope of the EITI Standard, including the tables, charts and figures from EITI reports.]*  EITI [Reports](https://www.eiti.am/en/annual-reports/2022)  EITI online reporting platform  <https://reports.eiti.am/hy/> |
| Has the MSG identified gaps in the availability of EITI data in open format? If yes, what kind of gaps? (Requirement 7.2.b)  Data are mainly available in the open format.  Certain gaps are related to the impossibility of machine reading and lack of interoperability of the published EITI data. |  |
| Has the MSG undertaken efforts to improve the availability of data in open format? If yes, please describe these. (Requirement 7.2.b)  The MSG efforts in this regard were expressed in the activities aimed at ensuring the systematic disclosure of EITI data, which were stipulated in the [EITI Work Plans](https://www.eiti.am/en/eiti-work-plan/).  Dvelopment of the relevant software and the launch of the EITI unified data platform will ensure machine reading opportunity and interoperability of the data. |  |
| Have summary data files been completed for each fiscal year for which data has been disclosed? (Requirement 7.2.c)  *Yes* | <https://drive.google.com/drive/folders/0B361RU22DTPfUUp1dVFmQ2VSU3M?resourcekey=0-8xvdQ_-6F-DL34GcQCIx5g>  https://www.eiti.am/en/annual-reports/2022 |
| *What systematically disclosed data that is in the scope of EITI disclosures is machine readable and inter-operable? (Requirement 7.2.d)*  Information on systematic data is provided in detail in the EITI summary data files which were submitted to the EITI International Secretariat. |  |

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## Outreach and communications (Requirement 7.1)

MSG’s self-assessment

**Fully met**

The objective of this [requirement](https://eiti.org/eiti-standard-2019) is to enable evidence-based public debate on extractive industry governance through active communication of relevant data to key stakeholders in ways that are accessible and reflect stakeholders’ needs.

**12. Describe the MSG’s efforts in the period under review to ensure that information published about the extractive sector is comprehensible and available in appropriate languages**.

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| The summary description of the MSG activities during the period under review is as follows:  The 3 EITI National Reports and their briefs were published on the [website](https://www.eiti.am/en/annual-reports/2022) of EITI.  Conferences dedicated to the presentation of the 3 EITI national reports were held in [2020](https://www.eiti.am/hy/Նորություններ/2020/09/14/2018-eiti-report-conference/98/), [2021](https://www.eiti.am/en/news/2021/07/23/2021-eiti-armenia-annual-conference-took-place-on-23-july/111) and [2022](https://www.eiti.am/en/news/2022/12/23/eiti-armenia-presented-4th-national-eiti-report/138), with around 100 participants each, during which the summary information required by the EITI Standard was presented. During these conferences, panel discussions were held on the issues and plans of the EITI and metal mining industry.  Short video clips[[10]](#footnote-10) covering the EITI activities were published.  Printed copies of EITI reports (40 copies of each) and summary Reports (400 copies of each), as well as booklets on the EITI activities were distributed to the interested stakeholders during the workshops, meetings, and conferences.  The EITI reports submitted by companies and authorized bodies, which contain the finacial data required by the EITI Standard, were published on the [EITI online reporting platform](https://reports.eiti.am/hy/), where user can access the information using various filters and visualization tools and, if necessary, export it in PDF and xls format.  The EITI summary data template for each year was published on the official website of EITI Armenia.  <https://www.eiti.am/en/annual-reports/2021/>  The information disclosed by the beneficial ownership declarations of the companies, which were submitted through the online system of BO declarations, was published on the website of the State Register of Legal Entities of the Ministry of Justice of the RA.  <https://www.e-register.am/am/>  <https://www.eiti.am/hy/%D4%BB%D6%80%D5%A1%D5%AF%D5%A1%D5%B6-%D5%BD%D5%A5%D6%83%D5%A1%D5%AF%D5%A1%D5%B6%D5%A1%D5%BF%D5%A5%D6%80%D5%A5%D6%80%D5%AB-%D5%A2%D5%A1%D6%81%D5%A1%D5%B0%D5%A1%D5%B5%D5%BF%D5%B8%D6%82%D5%B4>  The register of mining rights and mining contracts (including all amendments and annexes) are published on the website of the Ministry of Territorial Administration and Infrastructure:  <https://mtad.am/pages/extractive-industries-transparency-initiative>  The ongoing EITI activities have been covered in the Quarterly/Semi-annual and Annual Progress Reports on EITI Implementation which are published on the official website of EITI:  <https://www.eiti.am/en/Quarterly-annual-reports/>  The workshops, meetings, and trainings, conducted by or jointly with EITI Armenia for CSOs, media, communities, and other stakeholders, which are presented in Point 14 below, also had a clear outreach impact. |

**13. Describe examples of use of EITI data.**

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| *[Document instances of use of EITI data in various formats, whether from MSG members or any stakeholders. Examples of types of EITI data use could include:*   * *Print and broadcast media coverage of stories referencing EITI data* * *Research and analytical studies drawing on EITI data* * *Advocacy and lobbying notes referencing EITI data* * *Parliamentary submissions or proceedings drawing on EITI data* * *Etc.*   *Provide links to supporting evidence where available.]*  Anecdotal evidence can also be recorded, for instance in the following way:  [This person / group ] has used [type of data in the scope of EITI disclosures] to do [what the data was used for / what problem did it solve.]  Below are some of the published materials:  **Articles[[11]](#footnote-11) on “Hetq” Investigative Journalists platform (authored by Kristine Aghalaryan, 2022).**  **Factor TV publications[[12]](#footnote-12)**  **Ecolur publications[[13]](#footnote-13)**  **Freedom of Information Center publications[[14]](#footnote-14)**  **Press materials**  http://www.foi.am/hy/projects-archive/item/2300/  "Women in the Process of Transparency in Beneficial Ownership". an open talk with the participation of women implementing BO reform  <https://www.youtube.com/watch?v=PMrGC_11xLU>  https://www.facebook.com/photo/?fbid=5889952884349303&set=pcb.5889954047682520 |

**14. Provide information about outreach events organised to spread awareness of and facilitate dialogue about governance of extractive resources, building on EITI disclosures**.

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| **Event name** | **Brief description of the event** | **Date** | **Location** | **Organiser** | **Number and type of attendees** | **Links to further information** |
| Training | Presentation of the mining fiscal regime in Armenia and the EITI Requirements of financial flows’ transparency | March 6-8, 2020 | Dilijan, Armenia | EITI Secretariat of Armenia with the support of German Development Cooperation via Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) | 28 responsible representatives from the EITI MSG and authorized bodies in the mining industry | https://www.eiti.am/en/news/2020/03/09/eiti-fiscal-regime-training-6-8-march-2020-eng/82 |
| Training | On EITI and Responsible Mining | May 25-June 2, 2020 | Yerevan, Armenia | American University of Armenia (AUA) Center for Responsible Mining | More than 40 representatives from government departments, stakeholder groups, local communities, NGOs, youth organizations, and media | https://www.eiti.am/en/news/2020/06/30/training-on-eiti-and-responsible-mining/86 |
| Conference | Presentation of the 2nd EITI National Report of Armenia | September 14, 2020 | Yerevan, online | EITI National Secretariat | About 100 representatives from the RA Government, mining companies, CSOs, EITI International Secretariat, international partner organizations | <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2020/09/14/2018-eiti-report-conference/98/> |
| Training | Online presentation-training on the test version of the BO online declaration submission platform | December 3, 2020 | Yerevan, online | EITI National Secretariat | 22 representatives from mining companies, Ministry of the Territorial Administration and Infrastructure, Agency for State Register of Legal Entities of the Ministry of Justice, and the World Bank |  |
| Webinar | “Corruption Risks in the Extractive Sector and the Role of the EITI in Mitigating Corruption” | June 21, 2021 | Remote | the Asia Team from EITI International Secretariat | Representatives from the MSGs, National Secretariats, anti-corruption bodies, and organizations in EITI countries | https://www.eiti.am/en/news/2021/06/22/corruption-risks-in-the-extractive-sector-and-the-role-of-the-eiti-in-mitigating-corruption-webinar/107 |
| Conference | Presentation of the 3rd EITI National Report of Armenia and the Beneficial Ownership Electronic Declaration System | July 23, 2021 | Yerevan, Armenia | EITI National Secretariat | About 100 representatives from the RA Government, mining companies, CSOs, the EITI International Secretariat, and international partner organizations. The conference was also live-streamed via the Zoom platform, enabling everyone interested to follow and participate in the Conference remotely | https://www.eiti.am/en/news/2021/07/23/2021-eiti-armenia-annual-conference-took-place-on-23-july/111 |
| Forum | On Responsible Mining Policy | December 15, 2021 | Yerevan, Armenia | Transparency International Anti-Corruption Center | Representatives from the RA authorized state bodies, Grant Thornton Company, EITI Secretariat of Armenia, CSOs, media, local self-government bodies and other interested parties | <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2021/12/16/%D5%8A%D5%A1%D5%BF%D5%A1%D5%BD%D5%AD%D5%A1%D5%B6%D5%A1%D5%BF%D5%B8%D6%82-%D5%A8%D5%B6%D5%A4%D5%A5%D6%80%D6%84%D6%85%D5%A3%D5%BF%D5%A1%D5%A3%D5%B8%D6%80%D5%AE%D5%B4%D5%A1%D5%B6-%D6%84%D5%A1%D5%B2%D5%A1%D6%84%D5%A1%D5%AF%D5%A1%D5%B6%D5%B8%D6%82%D5%A9%D5%B5%D5%A1%D5%B6-%D6%86%D5%B8%D6%80%D5%B8%D6%82%D5%B4/117/>  <https://transparency.am/hy/media/news/article/3227> |
| Workshop | On “Capacity building to BO data users” | December 7-9, 2021 | Yerevan, online | Under the Opening Extractives programme jointly delivered by the EITI and Open Ownership, and in partnership with the Freedom of Information Centre in Armenia | CSO representatives and media | <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2022/02/24/upscaling-the-use-of-beneficial-ownership-data-in-armenia/121/>  <https://www.openownership.org/en/blog/upscaling-the-use-of-beneficial-ownership-data-in-armenia/> |
| Workshop | On “Development of BO data verification system” | May 31, 2022 | Yerevan | Under the Opening Extractives programme jointly delivered by the EITI and Open Ownership | 30 stakeholders with an interest and role in further improving the quality, accuracy, and reliability of Armenia's BO data | <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2022/06/07/opening-extractives-in-armenia/126/>  <https://www.openownership.org/en/news/new-moves-to-improve-data-quality-in-armenia/> |
| Workshop | On “Increasing the efficiency and capacity building of environmental and health measures in programs developed and implemented by communities” | August 3-5, 2022 | Tsaghkadzor, Armenia | EITI National Secretariat | 50 responsible representatives of the RA authorized state bodies, municipalities, affected communities, and Yerevan Municipality | https://www.eiti.am/en/news/2022/08/08/three-day-training-workshop-in-tsaghkadzor/130 |
| Panel discussion | On “Women in the Process of Transparency in Beneficial Ownership” | October 19, 2022 | Yerevan | Freedom of Information Center of Armenia with the support of OpenOwnership and EITI | Women implementing BO reform | <http://www.foi.am/hy/news/item/2302/>  <https://factor.am/568627.html?fbclid=IwAR3JhtubphvrLauotEdBBbIJFRTc_anWQ_jPLPOub3hO45RBqZPaDNUo-Gg> |
| Workshop | On “The Usage of Beneficial Ownership Data in Armenia” | **October 21-22, 2022** | Aghveran, Armenia | **Freedom of Information Center, with the support of Open Ownership and EITI** | **representatives of media and non-governmental organizations** | <http://www.foi.am/hy/news/item/2304/>  <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2022/10/24/opening-extractives/136/>  <https://www.openownership.org/en/blog/armenias-path-to-beneficial-ownership-transparency-and-data-use/> |
| Conference | Presentation of 4th EITI National Report | December 22, 2022 | Yerevan, Armenia | EITI National Secretariat | **About 100 representatives from the RA Government, mining companies, CSOs, the EITI International Secretariat, and international partner organizations. The conference was also live-streamed via the Zoom platform, enabling everyone interested to follow and participate in the Conference remotely.** | <https://www.eiti.am/en/news/2022/12/23/eiti-armenia-presented-4th-national-eiti-report/138>  <https://www.youtube.com/watch?v=BWfyTrhZt8E&t=12s> |
| Discussion | On “Technical requirements and data quality of the IT system for systematic disclosures of EITI data” | February 3, 2023 | Yerevan, Armenia | EITI National Secretariat | 25 participants, including the MSG members, representatives of authorized state bodies and communities that participated remotely | <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2023/02/06/eiti-sdd-discusion/139/> |
| Workshop | On Royalty Allocations to Community Budgets | May 4-6, 2023 | Tsaghkadzor, Armenia | EITI National Secretariat | 40 responsible representatives of the RA authorized state bodies, municipalities, affected communities | https://www.eiti.am/en/news/2023/05/08/a-three-day-training-workshop-in-tsaghkadzor-on-the-royalty-allocations-to-community-budgets/141/ |
| EITI Global Conference |  | June 12-15, 2023 | Dakar, Senegal | EITI International Secretariat | 4 participants from Armenia |  |

**15. Describe the MSG efforts in the period under review to consider access challenges and information needs of data users, including different genders and subgroups of citizens**.

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| When discussing data access and data users' needs, the MSG takes into account the fact that different subgroups of users, such as media**,** CSOs, community representatives, or women, may have different information needs and abilities to use the accessible EITI data. Therefore, in the Work Plans the MSG envisaged and implemented activities aimed at solving similar problems of these groups. Below are the reflections on such efforts:  Workshops organized particularly for the media and CSOs:  <http://www.foi.am/hy/news/item/2304/>,  <https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2022/02/24/upscaling-the-use-of-beneficial-ownership-data-in-armenia/121/>,  [https://www.eiti.am/hy/Նորություններ/2020/06/30/Դասընթաց-ԱՃԹՆ-գործընթացի-վերաբերյալ/86/](https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80/2020/06/30/%D4%B4%D5%A1%D5%BD%D5%A8%D5%B6%D5%A9%D5%A1%D6%81-%D4%B1%D5%83%D4%B9%D5%86-%D5%A3%D5%B8%D6%80%D5%AE%D5%A8%D5%B6%D5%A9%D5%A1%D6%81%D5%AB-%D5%BE%D5%A5%D6%80%D5%A1%D5%A2%D5%A5%D6%80%D5%B5%D5%A1%D5%AC/86/)  Workshops organized particularly for communities:  <https://www.eiti.am/en/news/2022/08/08/three-day-training-workshop-in-tsaghkadzor/130>  https://www.eiti.am/en/news/2023/05/08/a-three-day-training-workshop-in-tsaghkadzor-on-the-royalty-allocations-to-community-budgets/141/  Discussions organized particularly for women:  <http://www.foi.am/hy/news/item/2302/>  <https://factor.am/568627.html?fbclid=IwAR3JhtubphvrLauotEdBBbIJFRTc_anWQ_jPLPOub3hO45RBqZPaDNUo-Gg>  Civil Society constituency during the reporting period held a list of meetings in the affected communities. Information about those activities are presented in this and “Stakeholders engagement” template. |

**16. Describe other efforts by the MSG in the period under review to ensure that information is widely accessible and distributed**.

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| *[Document whether the MSG has*   * *produced summary reports, thematic reports or other analysis* *that is accessible, concise and easily understood by target audiences;* * *summarised and compared the share of each revenue stream to the total amount of revenue that accrues to each respective level of government.* * *undertake capacity-building efforts, especially with civil society and through civil society organisations, to improve understanding of the information and data from the reports and online disclosures and encourage use of the information by citizens, the media and others.*   *Provide links to supporting evidence.]*  The [official website](https://www.eiti.am/en/) of EITI Armenia served as a platform for the dissemination of accessible and concise information. The sub-pages of the website regularly published the legal acts, documents, studies, [news and analytical reviews](https://www.eiti.am/hy/%D5%86%D5%B8%D6%80%D5%B8%D6%82%D5%A9%D5%B5%D5%B8%D6%82%D5%B6%D5%B6%D5%A5%D6%80?page=1).  In addition to the EITI Annual National Reports, the website always published the EITI [Summary reports](https://www.eiti.am/en/annual-reports/2022), which present the annual outcomes of the metal mining industry's activities in Armenia. The printed copies of these summary reports were distributed to different stakeholders every year during the period under review.  The accounts of EITI Armenia on Facebook[[15]](#footnote-15), Youtube[[16]](#footnote-16) and Twitter[[17]](#footnote-17) were regularly updated, publishing information on the EITI implementation and the mining industry and ensuring access and awareness to the general public.   * *summarised and compared the share of each revenue stream to the total amount of revenue that accrues to each respective level of government.*   The data can be accessed in the National Reports and summary reports.  In addition, the interested stakeholders can access the disaggregated financial and economic data of the sector's income in a visible and didactic way through the filtering[[18]](#footnote-18) and automatic graphics[[19]](#footnote-19) generation tools on the platform, based on the 2016-2021 EITI Reports published in the website's online reporting system, and, if necessary, compare them with the data of previous years and do analysis: <https://reports.eiti.am/hy/>  The summary reports of the annual data of the metal mining industry disclosed in the EITI Reports, which present every revenue flow and its share in the total, were published on the website of EITI Armenia, as well as on the international platform of EITI: <https://drive.google.com/drive/folders/0B361RU22DTPfUUp1dVFmQ2VSU3M?resourcekey=0-8xvdQ_-6F-DL34GcQCIx5g>   * *undertake capacity-building efforts, especially with civil society and through civil society organisations, to improve understanding of the information and data from the reports and online disclosures and encourage use of the information by citizens, the media and others.*   Capacity building activities were included in the agendas of outreach activities. The description and links to these activities are introduced in Point 14 of this document. |

**17. How could the MSG improve the accessibility and distribution of information, considering the needs of different subgroups of citizens?**

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| In general, the data published through EITI are available for different target groups.  Development and launch of the IT platform for systematic data disclosures will make it possible to use IT innovative solutions and tools when publishing open data and ensuring accessibility. |

# Part III: Sustainability and effectiveness

Outcomes and impact of EITI implementation on natural resource governance (Requirement 7.4)

The objective of this [requirement](https://eiti.org/eiti-standard-2019) is to ensure regular public monitoring and evaluation of implementation, including evaluation of whether the EITI is delivering on its objectives, with a view to ensuring the EITI’s own public accountability.

MSG’s self-assessment

**Fully met**

**18. The MSG is requested to present any additional information and evidence related to the indicators for assessing the sustainability and effectiveness of EITI implementation**.

Each indicator will be assigned 0, 0.5 or 1 points by the EITI Board. The points will be added to the Outcomes and impact component score. The assessment of performance on the indicators will draw on information provided by the MSG, publicly available sources, stakeholder consultations and disclosures by the implementing country and companies. Please see the EITI Validation Guide for further information about how performance on these indicators will be assessed.

1. EITI implementation addresses nationally relevant extractive sector governance challenges. This indicator also recognises efforts beyond the EITI Standard.

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| The activity for the preparation of the EITI annual reports are included in the government's five-year action plans.  The introduction of the BO Institute of Legal Entities is included in the RA Anti-Corruption Strategy activity plan[[20]](#footnote-20) .  According to the Mining Industry Development Strategy the implementation of the EITI is considered as a strength toward good governance of the mining sector. |

1. Extractive sector data is disclosed systematically through routine government and corporate reporting.

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| Yes, submission of the EITI reports by the state bodies and extractive companies, as well as the publication EITI Standard's required data by the state bodies are legal requirements, compliance of which was ensured by all parties during the reporting period. |

1. There is an enabling environment for citizen participation in extractive sector governance, including participation by affected communities.

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| *There is no restriction of the right to free speech in Armenia. All interest groups, community representatives have the free right to organize meetings. According to the "Press Freedom Index 2023" report[[21]](#footnote-21) published by Reporters Without Borders (RSF), Armenia has improved its position, ranking 49th among 180 countries in the world.*  *A number of workshops and courses have been organized by the Armenia EITI to strengthen community capacities.*  *The civil society constituency has organized a number of awareness seminars during the reporting period.*  *Within the framework of the Opening Extractives program, the capacity development events were organized for the Armenia media sector.*  *Information on the above activities and relevant links are provided in this and the “stakeholder engagement” templates.* |

1. Extractive sector data is accessible and used for analysis, research and advocacy.

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| Information on data use and relevant links are provided in this and the “stakeholder engagement” templates.  The EITI data have been used during the development of the Mining Sector Development Strategy[[22]](#footnote-22). |

1. EITI has informed changes in extractive sector policies or practices. s

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| During the reviewed period, in particular, the legislation and practice on the targeted use of the environmental tax paid by companies, as well as the implementation of environmental and health projects in the affected communities were improved.  In 2022 the Government of Armenia adopted a legislative package according to which 2% of the royalties collected will be distributed to the affected communities. Affected settlements as well as the communities with affected settlements that have received royalties can develop and implement socio-economic development projects starting 2024.  In 2021 the legislation on BO disclosures has been improved.  In 2023 the Mining Industry Development Strategy was adopted. |

# Part IV: Stakeholder feedback and MSG approval

**19. Describe opportunities provided to stakeholders beyond MSG members to give feedback on the EITI process, including the EITI work plan.**

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| The EITI processes, including the EITI Work Plans, agendas of the MSG meetings, working meetings of the constituencies, etc., are considered and discussed by the MSG constituencies, that carry out all this through their wider constituencies, therefore these audiences can represent themselves through the constituencies that make up the MSG. In other words, MSG constituencies are the platform that provides an opportunity to other stakeholders as well to express opinions.  The MSG members and all the constituencies had the opportunity to freely express their opinion regarding the EITI implementation in Armenia. This is supported by the links provided in this document.  During the reporting period, within the framework of the "Engaged Citizenry for Responsible Governance" project implemented by the Transparency International Anti-Corruption Center with the support of USAID, information about which is available on the [website](https://transparency.am/en/media/news/article/3227) of the Transparency International Anti-Corruption Center, as well as in the Quarterly and Semi-annual Progress Reports on EITI Implementation in Armenia. |

**20. Describe how any feedback from stakeholders beyond MSG members have been considered in the review of the outcomes and impact of EITI implementation.**

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| As described in Point 19, the constituencies summarized the feedback from the wider audiences in their collective position and thus considered it in the review of the outcomes and impact of the EITI implementation. |

**21. Date of MSG approval of this submission and information on how the public can access it, e.g. link to national EITI website**.

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| MSG meeting date: 29/06/2023  <https://www.eiti.am/en/agenda-protocols-other-related-documents/> |

1. <https://reports.eiti.am/hy/> [↑](#footnote-ref-1)
2. <https://reports.eiti.am/hy/> [↑](#footnote-ref-2)
3. <https://reports.eiti.am/hy/graphics/> [↑](#footnote-ref-3)
4. <https://www.worldbank.org/en/news/immersive-story/2022/06/13/armenia-s-journey-towards-responsible-mining> [↑](#footnote-ref-4)
5. <https://www.ecolur.org/files/uploads/ecolurminingbigreport.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/vayqgoldfinalnew18062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/vardanizartonqnew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/gladzornew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/amulsarfinal111.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/lerexnew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/geghigoldnew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/gharagulyannernew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/tatstounlichqnew16062021.pdf><https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/tatstounaygedzornew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/lichqvazfinal16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/atmetals16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/aktivlernagortsnew16062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/megogoldreportnew.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/paramauntgoldnew.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/fortuneresoursisnew.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/marjanreportnew.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/dastakertreportnew.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/qaraberdreportfinalnew14062021.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/arjutreport16062021.pdf>

   <https://www.ecolur.org/files/uploads/mghartreportfinal.pdf>

   <https://www.ecolur.org/files/uploads/2020/Transparency%20Project%202020/sagamarreportfinalnew.pdf> [↑](#footnote-ref-5)
6. <https://www.ecolur.org/en/news/films/13665/> [↑](#footnote-ref-6)
7. <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/vardenismodul.pdf>

   <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/martunimodul.pdf>

   <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/sisiandatafinal.pdf>

   <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/gorisdatafinal.pdf>

   <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/akhtalamodul.pdf>

   <https://www.ecolur.org/files/uploads/2022/DATA%20modul%202022/odzunmodul.pdf> [↑](#footnote-ref-7)
8. <https://crm.aua.am/mpdpy/mining-policy-dialog-process/> [↑](#footnote-ref-8)
9. <https://mininginfo.am/hy/> [↑](#footnote-ref-9)
10. https://www.youtube.com/watch?v=IosFJDVzfNE

    <https://www.youtube.com/watch?v=G0t8CEBq5HM>

    <https://www.youtube.com/watch?v=_EAzSZ5lbWg>

    <https://www.youtube.com/watch?v=P4rSqiL9lQ0&t=28s>

    <https://www.youtube.com/watch?v=BWfyTrhZt8E&t=6s>

    <https://www.youtube.com/watch?v=IYKL5-izeWA> [↑](#footnote-ref-10)
11. https://hetq.am/hy/article/149944

    https://hetq.am/hy/article/149886

    https://hetq.am/hy/article/149358

    https://hetq.am/hy/article/148936

    https://hetq.am/hy/article/148483

    https://hetq.am/hy/article/147178

    https://hetq.am/hy/article/147088

    https://hetq.am/hy/article/146850

    https://hetq.am/hy/article/146459

    https://hetq.am/hy/article/145275

    https://hetq.am/hy/article/144625

    https://hetq.am/hy/article/144576

    https://hetq.am/hy/article/143945

    https://hetq.am/hy/article/143861

    https://hetq.am/hy/article/143651

    https://hetq.am/hy/article/143409

    https://hetq.am/hy/article/143189

    https://hetq.am/hy/article/142288

    https://hetq.am/hy/article/141519

    https://hetq.am/hy/article/140814

    https://hetq.am/hy/article/140794

    https://hetq.am/hy/article/140277 [↑](#footnote-ref-11)
12. https://factor.am/503797.html

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