

**From:** [REDACTED]  
**Sent:** 07 May 2024 07:21  
**To:** IPAM - Independent Project Accountability Mechanism  
**Subject:** Tivat-Jaz boulevard – COMPLAINT  
**Attachments:** [REDACTED]

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TO WHOM IT MAY CONCERN

Dear Sir or Madam,

We are writing to you on behalf of residents of the local community of Grbalj who have organized themselves under the non-governmental organization NVO „GRBALJ-BULEVAR“ established by Decision of the Ministry of Public Administration, Digital Society and Media no. UPI 08-056/21-1902/). The main focus of NVO „GRBALJ-BULEVAR“ is to engage to protect the rights of the owners of the land and homes alongside the Tivat-Jaz road section and to oppose the so called reconstruction of this road sections in order to draw attention to disastrous consequences of this project for local community of Grbalj to the Government of Montenegro, Ministry of Transport and Maritime Affairs (formerly Ministry of Capital Investments), local government authorities of Kotor, Tivat and Budva and organizations involved in realization of this project, such as European Bank of Reconstruction and Development in Montenegro which is providing financial support for this project.

Once again we are compelled to present a formal written complaint to request your institution to reconsider further financial support for the Tivat-Jaz boulevard project which from its beginning was overshadowed by lack of transparency and potential corruption. The idea of Tivat-Jaz boulevard construction was opposed by the residents of the local community of Grbalj since the beginning as it has characteristics of the highway and would be harmful to the densely populated areas of Radanovići and Lastva Grbaljska. On the other hand the Tivat-Jaz boulevard project is to replace the development of the Adriatic-Ionian expressway which is a road alignment composed of a series of city bypasses planned to divert the traffic from congested urban areas of Herceg-Novi, Tivat, Budva (including local community of Grbalj) and Bar. Since the start of discussions regarding so-called reconstruction of this road sections almost nine years ago, we have formally provided our objections to the Tivat-Jaz boulevard project, none of which have been accepted, apart from minor ones. Most importantly, we pointed out that the current Tivat-Jaz road section is burdened with the most traffic in the country and that the common logic and best road engineering practice is to divert the traffic from densely populated areas and not to construct boulevard which will only increase traffic in such areas. In this way the needs of the local community were completely disregarded and we are being forced to accept this project which is totally unacceptable and absolutely against the interests of the local community, endangering our properties, quality of life and well-being. From the beginning the complete project has been totally non-transparent as the project design has not been publicly presented and there was no public discussion about the project design. Now the construction of the Tivat-Jaz boulevard project has commenced and in its initial construction phase we can see on the construction site that our concerns were justified as people's backyards are being excavated up to the entrance of their homes which you can witness on the photographs that we are sending you enclosed to this letter. It is important to underline that construction of the Tivat-Jaz boulevard project is yet to start in the most densely populated areas and the fears and concerns of the local community are growing higher by each day as construction of the Tivat-Jaz boulevard is progressing.

As during the discussions with representatives of institutions who are responsible for planning of the construction i.e.: Ministry of Transport and Maritime Affairs (formerly Ministry of Capital Investments), local government authorities of Kotor, Tivat and Budva and Directorate for Road Transport in Montenegro, our multiple attempts to draw attention to the disastrous effects of the Tivat-Jaz boulevard project to residents of local community of Grbalj have not given result, we formally request your organization to withhold further financial support for this project which has not been done in accordance with the law. As we have already informed you, major illegalities have been made since the start of the Tivat-Jaz boulevard project including absence of valid assessments studies which had to be presented to the public.

On top of this, as your institution has provided financial support for many important transport infrastructure investments throughout Europe we are confident you haven't encountered any similar project to the Tivat-Jaz boulevard project where the road section with the most traffic in the country, such as current Tivat-Jaz road section, is being more than doubled in size to increase traffic on this already heavily traffic burdened road section instead of constructing alternative road to divert the traffic from densely populated area. We deem that the Tivat-Jaz boulevard project is particularly purposeless when taken in consideration that alternative road with aim to divert the traffic from this densely populated area is already being projected through the Adriatic-Ionian expressway which is prioritized by EU Commission which also offers funding for this transport investment.

We believe this is not justifiable use of finance granted by your institution and that it is in your best interest to take strict action and intervene as suggested regarding the above-mentioned matter in order to seek solution to this problem.

We look forward to hearing from you.

With thanks,

NVO GRBALJ-BULEVAR

Radanovici- Kotor

Montenegro