From: [redacted]
To: IPAM - Independent Project Accountability Mechanism
Cc: [redacted]
Subject: Formal Complaint: EBRD-Financed CGES Energy Infrastructure Project – Violation of Property Rights and Environmental Safeguards (Gornja Brezna, Montenegro)
Date: 30 March 2026 16:52:08

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Dear Sir or Madam,

I am writing to submit a formal complaint regarding the EBRD-financed energy infrastructure project implemented by the Montenegrin electricity transmission system operator (CGES) in the village of Gornja Brezna, Municipality of Plužine, Montenegro.

My sister and I are the legal co-owners of approximately 45,000 m² of forest land located directly within the affected project area. This land has been in our family for generations and holds deep historical and emotional significance—our grandfather lost his life on this land during the Second World War. It is privately owned property, protected under Montenegrin law and international human rights standards.

We also wish to note that we are aware of a complaint already submitted to the European Bank for Reconstruction and Development (EBRD) by the local initiative “Save Brezna” (Case No. 2025/11). We support and align ourselves with the concerns raised in that submission, and through this letter we seek to amplify those voices by providing an additional, directly affected landowner perspective.

We believe that the current project, including the construction of a 400/110 kV substation and associated high-voltage transmission infrastructure, raises serious concerns regarding compliance with the EBRD’s Environmental and Social Policy and fundamental principles of property protection.

1. Violation of Property Rights (ECHR Protocol 1, Article 1)
The project will effectively deprive us of the peaceful enjoyment of our property, as guaranteed under Article 1 of Protocol No. 1 to the European Convention on Human Rights. The presence of high-voltage infrastructure imposes severe and permanent restrictions on the use of land, including prohibitions on construction, limitations on access, and a drastic reduction in market value.

Such interference may only be justified where it is lawful, proportionate, and accompanied by fair compensation and due process. At present, we have not been meaningfully consulted, nor have we been offered adequate compensation or legal clarity regarding the

status of our land.

2. Non-Compliance with EBRD Environmental and Social Policy
We are concerned that the project may be in breach of several EBRD Performance Requirements, including:

- **PR1 (Assessment and Management of Environmental and Social Impacts)** – lack of transparent and accurate assessment, particularly regarding the status of the land and its ownership
- **PR5 (Land Acquisition, Involuntary Resettlement and Economic Displacement)** – economic displacement through loss of land use and value without proper safeguards
- **PR6 (Biodiversity Conservation and Sustainable Management of Living Natural Resources)** – deforestation and degradation of forest ecosystems
- **PR10 (Information Disclosure and Stakeholder Engagement)** – absence of meaningful consultation with affected landowners

We have reason to believe that the area has been inaccurately described as “deserted” or uninhabited, which is factually incorrect and materially misleading.

3. Environmental and Safety Risks
The installation of high-voltage infrastructure introduces significant environmental risks, including:

- potential soil and groundwater contamination from transformer oil leakage
- long-term ecosystem degradation due to deforestation and land fragmentation
- continuous noise pollution from transformers
- exposure to low-frequency electromagnetic fields, which, while regulated, remain a subject of ongoing scientific concern

These factors cumulatively render the land unsuitable for residential, agricultural, or ecological use.

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4. Disproportionate Burden and Lack of Alternatives
The project imposes a disproportionate burden on individual landowners for the benefit of broader commercial and state interests. We question whether alternative routes or locations have been genuinely and transparently considered, particularly those that would avoid private land or minimize environmental harm.

5. Integrity and Due Diligence Concerns

The EBRD has publicly committed to the highest standards of integrity, ethical conduct, and accountability. Any reliance on inaccurate or incomplete information—such as mischaracterizing inhabited or privately owned land as "deserted"—raises serious concerns regarding the integrity of the project appraisal and due diligence processes.

REQUEST FOR ACTION

In light of the above, we respectfully request that the EBRD:

- Initiate an immediate review of the project's compliance with its Environmental and Social Policy
- Investigate the accuracy of project documentation and representations regarding land ownership and use
- Ensure full and meaningful consultation with affected landowners, including ourselves
- Assess whether viable alternative project alignments exist that would avoid or minimize harm

Suspend further project activities affecting our land until these issues are resolved
Clarify available remedies, including access to the Independent Project Accountability Mechanism (IPAM)

This matter concerns not only our family's property and heritage, but also the credibility of the EBRD's commitment to responsible and ethical investment.

We are prepared to provide full documentation of ownership, location, and impacts, and we are willing to engage constructively in any review or mediation process.

We kindly request confirmation of receipt of this complaint and information on next steps.

Yours sincerely,

Svetlana Balovska Durkovic and Suzana Vujacic