



# NON-TECHNICAL SUMMARY

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***CGES – Upgrade of SS Brezna from 110/35 kV to 400/110 kV***

March 2024

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## List of Abbreviations

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E&S	Environmental and Social
CESMP	Construction Environmental and Social Management Plan
CGES	Crnogorski elektroprenosni sistem - Montenegro's transmission system operator
DTU	Durmitor Geotectonic Unit
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMF	Electro-Magnetic Field
ESAP	Environmental and Social Action Plan
ESP	Environmental and Social Policy
EU	European Union
EPA	Environmental Protection Agency
NTS	Non-Technical Summary
OHS	Occupational Health and Safety
O&M	Operation and Maintenance
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SS	(Electrical) Substation
UTC	Urban and Technical Conditions



## 1 Introduction

The European Bank for Reconstruction and Development (EBRD) is considering providing finance to Crnogorski Elektroprenosni Sistem Ad (CGES), the Montenegrin transmission system operator. The proceeds will be used to finance the upgrade of the existing electrical substation (SS) Brezna from 110/35 kV to 400/110/35 kV by installing two power transformers 400/110 kV and connecting to the national transmission network via the new 400 kV OHL Lastva-Pljevlja (currently under development). SS Brezna is located in the Municipality of Pluzine.



*Figure 1: Orthophoto of SS Brezna (Source: Enova)*

The electrical SS Brezna is a key project for CGES, strategically designed to ensure a stable and reliable supply and distribution of electrical energy to consumers. This project is specifically oriented towards integrating energy generated from renewable sources into the existing transmission grid (RES integration).

The project will be managed by CGES through a formal Project Implementation Unit (PIU), which is anticipated to receive additional support from a PIU Support Consultant.

The Project has been categorised as Category “B”<sup>1</sup> according to the EBRD E&S Policy (ESP) (2019).

In 2018, an environmental and social (E&S) due diligence was carried out for the SS Brezna upgrade<sup>2</sup>. In late 2023, an additional E&S review of the Project was undertaken to assess compliance with EBRD and European Union (EU) standards.

This document is a Non-technical Summary (NTS) of the E&S Assessment of the Project carried out in 2018 and 2023. The NTS provides a Project summary in non-technical language covering the Project background and description, legal requirements, E&S benefits and impacts with mitigation measures needed to structure the Project to meet the EU requirements, EBRD ESP (2019), and the disclosure and communication requirements of the Project.

<sup>1</sup> According to the EBRD Environmental and Social Policy (ESP), a project is categorised “B” when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures.

<sup>2</sup> WB6-MNE-ENE-06 Montenegro: Feasibility Study and Preliminary Design – Electricity Network Expansion for the Development of RES; 400/110 kV Substation Brezna - Environmental and Social Assessment Report

## 2 Brief Project Description

The development of SS Brezna is structured into two phases. Phase I included constructing a 110/35 kV substation, which was completed and commissioned in 2016. It is located in the Municipality of Pluzine, locality Brezanski Lug, at the foot of Mount Vojnik.

Phase II aims to upgrade SS Brezna up to the 400 kV level. The Project involves expanding the current electrical substation by adding two transformers 400/110 kV and connection to the 400 kV transmission network by diverting 400 kV OHL Lastva-Pljevlja. Additionally, necessary modifications to the busbars will be made to accommodate new transmission line connections. This new 400/110 kV substation will occupy new land with an area of 31,343 m<sup>2</sup>, approx. 3.1 hectares.

The **Preliminary Design** for Phase II was developed in 2018. It suggested to use a strong concrete foundation that rests directly on the ground for both the main building and the equipment in the field. However, following the commissioning of the SS Brezna Phase I, observations of soil and foundation movements necessitated a comprehensive reassessment of the geotechnical characteristics of the land plot designated for the Phase II expansion. Consequently, detailed geotechnical surveys and investigations were undertaken, revealing that the soil characteristics are more complex than initially assumed. This critical information prompted a revision of the Preliminary Design, specifically addressing the appropriate foundation method for these conditions and the associated civil works. The revision is still ongoing (expected to be completed in February 2024).

The figure below presents the planned layout of SS Brezna upon completion of Phase II.

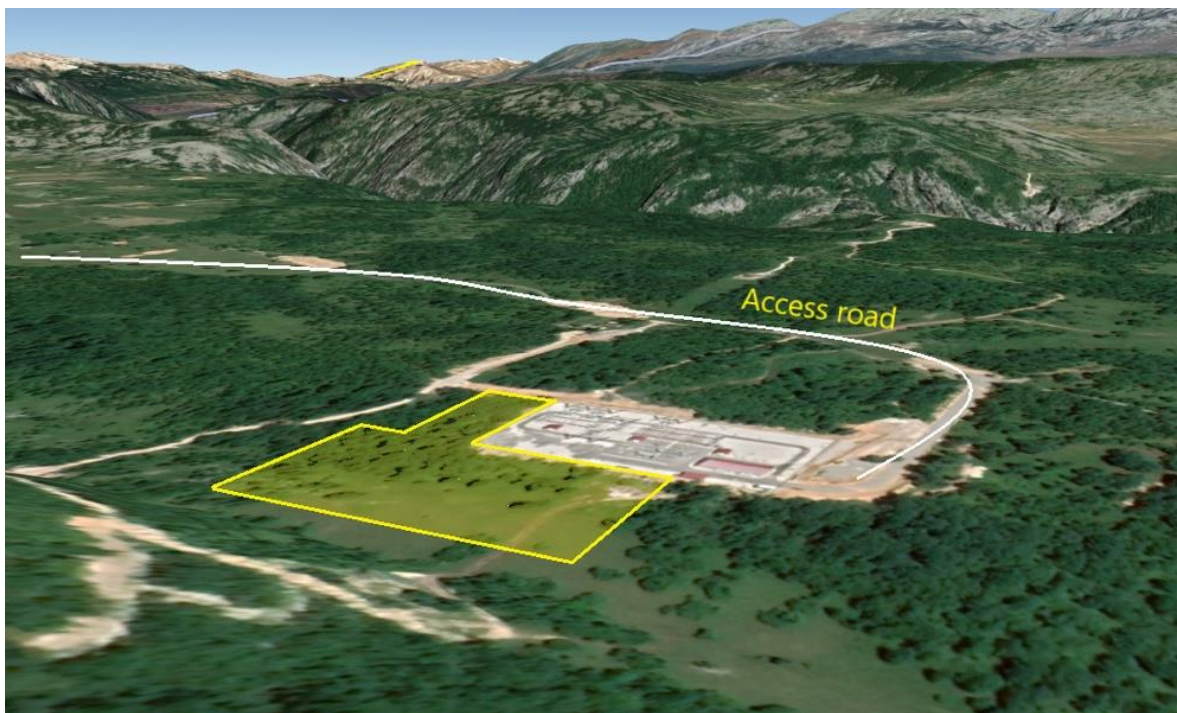


Figure 2: Preview of SS Brezna with Phase II extension approximate limits (marked yellow) (Source: Google Earth/Enova)

## 3 Policy and Legal Framework

### 3.1.1 National Policies

The construction of SS Brezna will help fulfil the objectives outlined in Montenegro's *Energy Development Strategy until 2030*<sup>3</sup>, which focuses on two main priorities: ensuring energy supply security and promoting sustainable energy development.

This Project aims at facilitating the integration of renewable energy sources into the grid. Consequently, SS Brezna plays a pivotal role in achieving Montenegro's established objective of increasing the utilization of renewable energy sources outlined in the *National Sustainable Development Strategy until 2030*<sup>4</sup>. The need for the SS upgrade is identified in the Draft Plan for the Montenegro's Transmission System Development for the period 2023-2032<sup>5</sup>.

### 3.1.2 National Legal Requirements

The key national law applicable to the **construction of the Project and obtaining permits** is the *Law on Spatial Planning and Construction*<sup>6</sup>, which defines the requirements for constructing complex structures including “substations of 35 kV or more”. It outlines the responsibilities of investors, designers, contractors and engineering supervisors with regard to technical documentation and obtaining construction permits.

**Substation projects are potentially subject to the local Environmental Impact Assessment (EIA) procedure based on the Regulation on Projects for which an EIA is Required**<sup>7</sup>. For this Project, the EIA process will include these two specific steps for CGES:

1. **Deciding on the need for EIA and its scope (i.e. screening and scoping stages)** – CGES will submit a request, in line with respective by-laws, to the Environmental Protection Agency (EPA), seeking a *Decision on the necessity of an EIA*. Should an EIA be deemed necessary, EPA may ask from CGES to submit a new request to determine the Study's scope. These requests will include details about the Project and its potential environmental impacts. The EPA will notify relevant authorities, organizations, and the general public about these submissions. Interested parties have the right to express their viewpoints on these requests to the EPA. Subsequently, the EPA will publicly disclose the requests and notify both the public and CGES of the decision's outcome.
2. **Reporting** – If the Decision on the need for EIA points towards the need for development of an EIA Study, then the EIA Study will be developed based on the Preliminary Design. The EPA will review the EIA Study and publicly disclose it. The EIA Study will then be updated if needed (based on comments received), and EPA will publish the Decision on Acceptance of the EIA as the final step of the procedure.

Environmental, health and safety protection is ensured through a range of legislation that covers specific issues such as **environmental protection** (the *Law on Nature protection*, the *Law on Water*, the *Law on Air Protection*, the *Law on Waste Management*, the *Law on Noise protection*, the *Law on Forests*); **labour** (the *Labour Law*), **health and safety** (the *Law on OHS*, the *Regulation on OHS Measures at Temporary and Mobile Construction Sites*, *Law on Protection Against Non-Ionising Radiation*), and **land acquisition** (the *Law on Expropriation*).

<sup>3</sup> Ministry of Economy, Energy Development Strategy of Montenegro until 2030, May 2014

<sup>4</sup> <https://www.gov.me/dokumenta/6852d215-af43-4671-b940-cbd0525896c1>

<sup>5</sup> <https://regagen.co.me/wp-content/uploads/2022/04/Nacrt-plana-razvoja-prenosnog-sistema-elektricne-energije-za-period-2023-2032.-godine.pdf>

<sup>6</sup> Official Gazette of Montenegro, No. 64/17, 44/18, 063/18, 11/19, 82/20, 86/22

<sup>7</sup> Official Gazette of Montenegro, No. 047/13, 053/14, 037/18

### 3.1.3 Permits and Authorisations

A set of approvals and permits will be required for SS Brezna construction and commissioning. The following table provides an overview of these approvals/permits and the status of obtaining them.

*Table 1: Permits/approvals required for the Project implementation*

Permit/approval	Status
Urban and Technical Conditions (UTC)	The UTC for SS Brezna have not been issued yet. CGES has confirmed it plans to submit a request for issuing of the UTC soon to the Ministry of Ecology, Spatial Planning and Urban Development.
EIA Study requirements and approval	Screening request for the need to develop an EIA Study needs to be filed by CGES and - if required to be developed and approved as a precondition for issuing of the Construction Permit.
Construction Permit	To be obtained from the Ministry of Ecology, Spatial Planning and Urban Development after the completion of the Main Design. As noted above, EIA Study approval is a precondition for issuing the Construction Permit.
Public interest for expropriation/decisions on expropriation	CGES plans to request from the Government to issue a Decision on Public Interest. After public interest is declared, the Cadastre and State Property Administration will issue decisions on expropriation.
Water related approvals	Water Conditions should be obtained as part of UTC from the Water Administration of Montenegro. Water Consent to be obtained from the same authority when the Main Design is ready. Once the SS is constructed, Water Permit needs to be acquired prior to obtaining Use Permit.
Contractor permits/approvals	Based on the Construction Environmental and Social Management Plan (CESMP), the contractor will need, before commencement of works, to obtain all necessary licences/permits that might include i.e., consent on the waste management plan for construction or/and hazardous waste, permit for placement of temporary structures, permit for transport of unstandardised items etc.
Approval to put the SS into trial operation	To be obtained from the national Administration for Inspection Affairs (Electrical and Energy Inspection) prior to commencement of operation.
Use Permit	To be obtained from the Ministry of Ecology, Spatial Planning and Urban Development prior to putting the SS Brezna in operation.

### 3.1.4 EBRD Requirements

EBRD is committed to promoting environmentally sound and sustainable development. Its ESP (2019) outlines how the Bank will assess and monitor the E&S risks and impacts of its projects and sets minimum requirements for managing E&S impacts and risks caused by projects it finances. The Bank has defined specific Performance Requirements (PR) and requires all its projects to be structured to meet these:

- PR 1: Assessment and Management of Environmental and Social Risks and Impacts
- PR 2: Labour and Working Conditions
- PR 3: Resource Efficiency and Pollution Prevention and Control
- PR 4: Health, Safety and Security
- PR 5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement

- PR 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PR 8: Cultural Heritage
- PR 10: Information Disclosure and Stakeholder Engagement

### 3.1.5 EU Requirements

EBRD, as a signatory to the European Principles for the Environment, is committed to ensuring that projects are structured to meet EU environmental principles, practices and substantive standards. The most important EU requirements applicable to the Project include:

- Waste Framework Directive
- Directive on Waste Electrical and Electronic Equipment (Directive 2012/19/EU) (Directive 2008/98/EC on waste)
- Habitat Directive (Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) and Birds Directive (Directive 2009/147/EC on the conservation of wild birds)
- Convention on the Conservation of European Wildlife and Natural Habitats (ETS No. 104)
- Public Participation Directive 2003/35/EC, Access to Environmental Information Directive 2003/4/EC, Regulation (EU) 2021/1767 and the Aarhus Convention
- OHS Directives

The implementation of this Project will therefore enable CGES to meet the national requirements and strategic objectives, as well as EBRD and EU requirements. The E&S Action Plan (ESAP) developed for this Project includes a set of comprehensive mitigation measures to bring the Project into compliance with all these requirements.

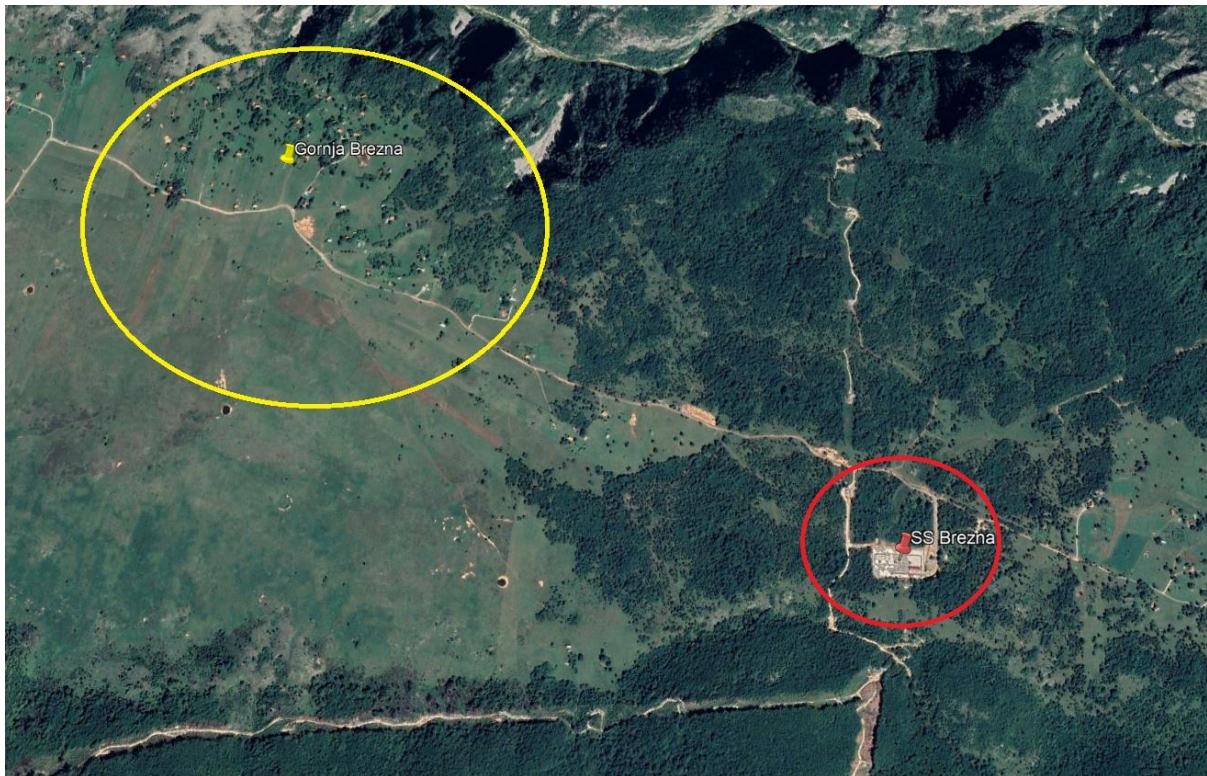


## 4 Environmental and Social Baseline Settings

SS Brezna is located in the Pluzine Municipality, which spans 854 km<sup>2</sup>. It shares borders with Niksic to the west, Zabljak and Savnik to the east, and Bosnia and Herzegovina to the north. As of the 2011 census, Pluzine had a population of 3,286 in 1,140 households.

There are no residential or business facilities in the vicinity of SS Brezna. The closest settlement to the SS Brezna is Gornja Brezna (at a distance of approx. 2 km from SS Brezna) with a population of 48 inhabitants (Figure 3).

It should be noted that the only road leading to the SS Brezna is a local road branching off from the regional road E762 Pluzine-Niksic-Podgorica. This narrow local road passes through the settlements of Donja Brezna (5-7 km from the SS Brezna) and Gornja Brezna, extending all the way to the SS Brezna, making it a critical route for both local residents and visitors.



*Figure 3: Distance from the nearest settlement*

SS Brezna expansion is planned to take place on the adjacent relatively flat plot.



Figure 4: Photograph of SS Brezna Phase I (in the centre) and dedicated plot for Phase II (at the bottom) (Source: Enova)

The site already has access available, eliminating the need for constructing a new access road. Access is facilitated via the main road Niksic-Pluzine, the existing road through the settlement Brezna, as well as the access road to the current 110/35 kV substation and nearby transmission towers.

The Project is situated in the vicinity of the contact zone between the High-Karst area, which is the most prominent geological unit in Montenegro, and the Durmitor geotectonic unit (DTU). The DTU consists of carbonate rocks from the Triassic and Jurassic ages, known for their high conductivity of water, particularly in the upper Jurassic layers. A preliminary geo-mechanical study has been conducted. Unofficial recommendations from experts underscored the complexity of the terrain, emphasising the importance of a comprehensive study to ensure the structural integrity of the expansion.

CGES has the responsibility to develop a final geo-mechanical study with the objective of implementing an appropriate technical solution. This solution should meet stability requirements and ensure the safe operation of the SS Brezna.

The Komarnica River runs close to the substation location, specifically on its northeast side, suggesting a medium to high flood hazard index.

SS Brezna is surrounded by birch (*Betula pendula*) stands which dominate the landscape in its immediate vicinity (Figure ). Birch is mixed with European hop-hornbeam (*Ostrya carpinifolia*), Turkey oak (*Quercus cerris*), and occasionally spruce (*Picea abies*) on mountain slopes. Wider area is covered in hay meadows actively used for hay production. The SS is not located within any nationally designated protected areas, nor internationally recognised sites. Therefore, the Project is not expected to cause any significant impact on ecological resources.





Figure 5: *Betula pendula* stands dominate the SS Brezna surroundings (Source: Enova)

Regarding **climate characteristics**, Pluzine is characterised by a moderate continental climate<sup>8</sup>. According to data from the Institute for Hydrometeorology and Seismology of Montenegro, the last three years have been categorised as exceptionally warm, considering mean annual temperature values. Based on precipitation percentiles, the period 2020-2022 is classified as normal. In the national-level document *Disasters Risk Assessment of Montenegro*, prepared by the Government of Montenegro in December 2021, the **extreme weather and climate events** potentially occurring in Montenegro's territory have been identified. Historical data indicates an average annual occurrence of 7 days with **strong and stormy winds** (> 68 km/h) in the northern region of Montenegro<sup>9</sup> which encompasses the municipality of Pluzine, where the settlement of Brezna is situated. Projections from the regional EBU-POM<sup>10</sup> model suggest an anticipated decrease in the average daily wind speed throughout the year by approx. 5% by 2100. **Heavy rains** are less frequent in the northern region of Montenegro, with a greater occurrence of days witnessing lower amounts of precipitation<sup>11</sup>. The potential occurrence of **landslides** in the Brezna area could primarily result from anthropogenic activities such as road construction and forest clearing<sup>12</sup>. According to the **drought** vulnerability map, the area of Brezna is characterised as slightly vulnerable to drought<sup>13</sup>. The Montenegro region is prone to **forest fires**<sup>14</sup>, often triggered by exceptionally high temperatures, lightning strikes, or the careless ignition of open-air fires. Considering Montenegro's seismic rezoning map<sup>15</sup>, the seismic hazard decreases from the coast towards the interior of the mainland. Consequently, the probability of an **earthquake** occurring in Brezna is low.

<sup>8</sup> [http://www.etno-selo-izlazak.me/?page\\_id=2152](http://www.etno-selo-izlazak.me/?page_id=2152)

<sup>9</sup> Government of Montenegro, Disasters Risk Assessment of Montenegro, Dec 2021

<sup>10</sup> Eta Belgrade University – Coupled Atmospheric Ocean Model

<sup>11</sup> Government of Montenegro, Disasters Risk Assessment of Montenegro, Dec 2021

<sup>12</sup> Montenegro Government, Disaster Risk Assessment of Montenegro, December 2021

<sup>13</sup> <https://www.meteo.co.me/page.php?id=48>

<sup>14</sup> GEF, UNDP and Montenegro Ministry of Sustainable Development and Tourism; Montenegro Third National Communication on Climate Change; 2020

<sup>15</sup> <http://www.seismo.co.me/questions/12.htm>

## 5 Environmental and Social Impacts and Mitigation Measures

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A summary of E&S impacts and risks during the pre-construction, construction and operation/maintenance (O&M) phases is provided below, followed by measures to be put in place to mitigate any such impacts/risks.

### Pre-construction phase

It will be necessary to acquire several private land plots (adjacent to the existing SS) with a total area of 3.1 hectares. These are owned by multiple individuals residing abroad. The land plots are currently not in use. CGES has commissioned an Expropriation Study, which has been approved by the Municipality of Pluzine. The next action planned by CGES involves preparing the documentation required to declare the project as a matter of public interest. Based on CGES's previous experiences with similar projects, it is understood that having a project declared as a public interest can significantly streamline and simplify the land acquisition process. A Land Acquisition Plan will be developed by CGES to manage land acquisition activities in line with national legislation and EBRD performance requirements.

The Main Design should integrate the most recent climate design parameters to reduce susceptibility to anticipated climate conditions, particularly floods. Based on the climate risk assessment, possible mitigation measures to consider include implementing drainage systems, raising substation equipment above anticipated flood levels, and protecting or bundling critical equipment.

### Construction phase

**Noise and vibrations.** Construction activities will temporarily raise noise levels, but these impacts will be minor, localised, and restricted to daylight hours. Noise control measures, like using well-maintained, silenced equipment, will limit noise disturbances beyond 100 m from the site. Construction will generate vibrations from equipment and machinery use. However, due to the absence of nearby properties or sensitive receptors within the range of these vibrations, it is highly unlikely that they will cause nuisance or be noticeable to the local population or other sensitive areas.

**Air quality.** The construction of the project may produce temporary air emissions, including dust and PM10, mainly settling within 100 m of the site. Effective mitigation measures will prevent significant environmental impacts.

**Hydrology and soils.** The construction phase of the project poses a low risk of indirect groundwater and soil pollution, potentially from earthworks, leakages, and inadequate waste management. However, with proper construction practices, significant impacts on groundwater and soil are not expected.

**Waste.** Construction of the proposed substation will predominantly generate construction-related waste and communal waste similar to household waste from the workforce. All waste management will comply with Montenegrin law and EU requirements, controlled through a Construction Waste Management Plan. Licensed haulers will remove all waste except excess rock and soil from the sites for proper management or disposal. Recycling of materials like steel, plastic, and glass will be prioritized.

**Biodiversity.** Construction of the proposed substation will temporarily and locally affect biological diversity through disturbance and negligible habitat loss. However, these impacts are minor and of low magnitude, as the project is in the area of the existing 110/35 kV Brezna substation.

**Traffic.** The only road leading to the SS Brezna is a local road branching off from the regional road E762 Pluzine-Niksic-Podgorica. This narrow local road passes through the settlements of Donja Brezna and Gornja Brezna, extending all the way to the SS Brezna, making it a critical route for both local residents and visitors. Minor traffic and temporary road closures during construction activities may result in traffic congestions on this road, leading to inconveniences for the local community and commuters passing through the area. The impact will be short-term and managed through a Traffic Management Plan.

**Health and safety.** All parties in the construction must adhere to CGES's internal health and safety regulations. A Project-specific Occupational Health and Safety Plan will be developed and implemented to ensure a safe and healthy work environment. CGES will review, approve, and oversee these plans to monitor contractor



performance. The contractor will also create and implement procedures to ensure public health and safety – this includes establishing rules for workers and securing construction sites, worker camps, vehicles, machinery, and equipment storage areas to prevent unauthorised access. An Emergency Response Plan will be developed for the project, detailing management procedures for various identified hazards and risks. This plan will include objectives and management principles, developed in consultation with relevant emergency services.

**Cultural heritage.** No archaeological sites and areas of cultural heritage exist in vicinity of SS Brezna. The construction contractor will be required to develop and implement a "chance-find" procedure in line with national cultural heritage protection laws. Additionally, workers will be trained in using these procedures.

**Cumulative impacts.** For the proposed project, potential cumulative effects during construction, like air pollution, noise nuisance, and traffic disturbance, could arise from interaction with similar nearby projects. However, no current or future projects of a similar type and size have been registered in close proximity or in the area directly affected by this construction. Therefore, no cumulative effects due to interaction with other projects are expected.

### O&M phase

The operation and maintenance procedures for SS Breza Phase II will remain consistent with the established practices implemented during Phase I. Accordingly, the anticipated impacts are not expected to differ significantly. However, the increase in voltage level from 110 kV to 400 kV will result in a corresponding **rise in noise levels**. Since no recipients have been identified nearby, the typical noise associated with high-voltage infrastructure is not expected to adversely affect the community. Nonetheless, to ensure the well-being of operators exposed to this effect, specific mitigation measures will need to be implemented.

Occurrence of **electromagnetic fields (EMFs)** is expected during the operation of high-voltage infrastructure but pose a low risk within electrical substations (SS), given the rapid diminishment of the magnetic field with distance. Nevertheless, in compliance with the *Law on Protection against Non-Ionising Radiation*<sup>16</sup>, the operation of an energised infrastructure is permissible exclusively with a previously obtained "permit for the use of a source of electric and magnetic fields" issued by the EPA. This permit is granted based on completed initial measurements of EMFs, and its validity extends for four years. During the operational phase, CGES is obligated to conduct regular EMF measurements as a control measure to ensure adherence to exposure limit values.

Waste generated in O&M phase will be managed in accordance with the existing CGES' Waste Management Plan that needs to be updated to extend beyond 2024.

### Conclusion

The identified negative E&S impacts are site-specific and can be effectively avoided, reduced or remedied through the implementation of mitigation measures outlined in the Project's Environmental and Social Action Plan (ESAP). The Contractor will be required to prepare and implement a Construction Environmental and Social Management Plan (CESMP). The PIU will oversee the implementation of specified mitigation measures.

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<sup>16</sup> Official Gazette of Montenegro, No. 35/13

## 6 Communications

A **Stakeholder Engagement Plan (SEP)** has been developed for this Project, outlining the stakeholder engagement and communication programme, including access to the Project's Grievance Mechanism. The contact point for any enquiries or grievances related to the Project is given below:

<p><i>SS BREZNA UPGRADE PROJECT</i>  <i>CGES - Project Implementation Unit</i>  <i>Address: Bul. Sv. Petra Cetinjskog 18</i>  <i>Tel.: +382 20 407-682</i>  <i>E-mail: office@cgcs.me</i></p>
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As elaborated in the SEP, CGES will undertake the following disclosure and consultation activities:

1. The PIU will disclose as early as possible in the Project development process:
  - this NTS of the Project;
  - the SEP and the Public Grievance Form;
  - the Land Acquisition Plan (LAP) to be developed by CGES.
2. The documents will be publicly available in Montenegrin language in electronic and printed forms at:

<i>Name of organisation</i>	<i>Website</i>	<i>Address</i>
CGES	<a href="http://www.cges.me">www.cges.me</a>	Bulevar Svetog Petra Cetinjskog 18, 81000 Podgorica, Montenegro
Municipality of Pluzine	<a href="https://www.pluzine.me">https://www.pluzine.me</a>	Trg Plužina 4, 81435 Pluzine, Montenegro

3. After the disclosure of the above documents, the PIU will announce the availability of the disclosure package in local media and encourage feedback from stakeholders.
4. The PIU will then schedule and hold a public consultation meeting to present the Project to stakeholders, discuss the concerns of the local communities and receive feedback, after the development of the Main Design. The meeting will be held in Gornja Brezna as the settlement closest to the SS Brezna. As needed, the PIU will organise separate small group discussions with any particular groups.
5. The PIU will inform all stakeholders about the exact date, time and venue where the meetings will be held 10 days in advance through the following channels: (a) official websites of CGES and Municipality of Pluzine, (b) announcements posted in settlements of Gornja Brezna and Donja Brezna, (c) local media and newspapers in wide circulation in Municipality of Pluzine, and (d) CGES social media (<https://www.facebook.com/CGESofficial>).
6. All Project-related comments and proposals will be considered by the PIU. A brief report ("comments matrix") on comments/proposals received and responses from the PIU will be published on the CGES website.
7. The PIU will ensure that specifics about the locations, anticipated commencement date, expected duration of planned works and any predicted disruptions in traffic flows and any other potential inconveniences to the public at least 30 days before start of works through the same channels listed above.
8. Once construction starts, information boards will be placed by the contractor at the construction site to clearly display contact information for third-party concerns (contact details of the dedicated contact person designated to address any issues or concerns raised by third parties - their name, position, phone number, and email address).

A **Project-specific grievance mechanism** has been set up a process for receiving, evaluating and addressing grievances from affected communities. The PIU will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected communities. A detailed explanation of the mechanism is provided in the SEP.