



# STAKEHOLDER ENGAGEMENT PLAN

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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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CGES	Crnogorski Elektroprenosni Sistem - Montenegro's transmission system operator
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESP	EBRD Environmental and Social Policy
EU	European Union
IPAM	Independent Project Accountability Mechanism
LAP	Land Acquisition Plan
NTS	Non-technical Summary
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SS	(Electrical) Substation
USP	Urban Spatial Plan

## 1 Brief Glossary of Stakeholder Engagement

This one-page glossary provides definitions for some of the most important concepts used in this Stakeholder Engagement Plan, although it is by no means an exhaustive list.

Glossary term	Definition/ Description
<b>Stakeholders</b>	Stakeholders are those: <ol style="list-style-type: none"> <li>1) who are <b>affected</b> (directly or indirectly, positively or negatively) by a project, including those who might be particularly <i>vulnerable</i> to project impacts; the project may affect their land, natural resources or water supply; it may present a short- or long-term disturbance to their lives; it may offer potential job opportunities or an improved service.</li> <li>2) who may have an <b>interest</b> in, or may otherwise influence, the project, but are not affected by it (i.e., interested parties, such as, for e.g., the media, investors, civil society organisations).</li> </ol>
<b>Stakeholder mapping</b>	Involves identifying all individuals, groups and organisations that are affected by a project or otherwise have an interest in the project, along with their needs, interests and concerns. Engagement planning is tailored to stakeholders' needs and interests, and is prioritised on those who are most affected by the project, particularly vulnerable to project impacts, and/or have a high degree of influence over project outcomes.
<b>Stakeholder engagement</b>	Refers to the ways in which an organisation communicates and interacts with local communities and other stakeholders, and involves them in decision-making and project implementation. Engagement is a two-way or multi-way process, with the aim of listening, building trust, reaching common understanding and generating mutual benefit.
<b>Stakeholder Engagement Plan (SEP) – this document</b>	A plan which sets out the requirements and steps needed to identify, consult and engage with stakeholders and disclose project information, to meet project objectives and the expectations of stakeholders. EBRD projects need to disclose a public SEP that meets the requirements of the EBRD Environmental and Social Policy to the EBRD.
<b>Grievance mechanism</b>	A non-judicial process managed by the project implementor for receiving, acknowledging, investigating and responding to Project-related grievances. The written procedure is normally publicly available on the project website and at relevant local sites. The procedure explains: the different channels for complaint; how and when the project implementor will respond; and how complainants can make an appeal or access mediation and arbitration if required. The mechanism should not affect a complainant's access to judicial or administrative remedies. A community grievance mechanism is usually separate from an employee grievance mechanism.
<b>Vulnerable people or groups</b>	People or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, ethnicity, religion, age, physical or mental disability, literacy, social status, etc. Vulnerable people may also include people in vulnerable situations, such as people living below the poverty line, single-headed households, natural resource dependent communities, internally displaced people, etc.



## 2 Introduction

### 2.1.1 Brief Project Description

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 – located in the Municipality of Pluzine – 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). CGES will establish a formal Project Implementation Unit (PIU), expected to be supported by a PIU Support Consultant. The Project has been categorised as Category “B”<sup>1</sup> according to the EBRD Environmental and Social Policy (ESP) (2019).

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

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.



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

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.

<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.

In the period 2015-2018, an environmental and social due (E&S) 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 EU standards.

The Preliminary Design for Phase II was developed in 2018. After the commissioning of the SS Brezna Phase I, observations of soil and foundation movements necessitated a comprehensive reassessment of the geotechnical characteristics of land 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, which is still ongoing and is expected to be completed in February 2024.

### 2.1.2 Objectives and Scope of this Stakeholder Engagement Plan

**This Stakeholder Engagement Plan (SEP) was developed by CGES in order to clearly communicate to all interested and affected parties the stakeholder engagement program** which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with Montenegrin legislation, as well as the requirements of EBRD.

**This SEP is a live document that will be periodically updated by the PIU** as necessary to reflect key changes in Project activities or any new developments in the Project scope.

### 2.1.3 Responsibility for SEP Implementation

The PIU is responsible for Project implementation. A specific person will be appointed by the PIU to be responsible for implementation of this SEP.

Contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of this SEP. The grievance mechanism requirements will be laid out in the contracts that will be signed with the contractors.

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<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

## 3 Regulatory Requirements for Stakeholder Engagement

### 3.1.1 Local Legislation Requirements

Several types of public consultations relevant to the Project are foreseen by legal regulations in Montenegro:

- 1) **Consultations during the adoption of spatial planning documents** – information disclosure and public consultations are mandated by the *Law on Spatial Planning and Construction of Facilities*. Spatial planning processes at all levels must incorporate public participation, providing sufficient time for the submission of comments. Following this, a public consultation report must be published to document the outcomes and feedback received. *Note: The relevant lower-level spatial plan for SS Brezna is the Urban Spatial Plan (USP) of the Municipality (2012). In May 2023, its amendments were initiated with the primary objective of, among other things, designating locations for the construction of solar and wind power plants. It is still being drafted and no public consultations have yet taken place. No information on the timeline for its finalisation is currently available.*
- 2) **Consultations during the approval of ten-year plans for the development of Montenegro's transmission system** – information disclosure and public consultations are mandated by the national *Ordinance on Preparation and Monitoring of the Implementation of 10-Year Plans for the Development of the Electric Power Transmission System*. CGES develops the plans and submits them to the Montenegro Regulatory Agency for Energy, after which the Agency is required to carry out public consultations. *For details about the process relevant for SS Brezna, please see section 5.1.2 Previous Stakeholder Engagement.*
- 3) **Consultations during the national Environmental Impact Assessment (EIA) procedure** – as required by the *Law on the EIA*: An EIA is not automatically mandatory for projects of this type but they fall under the category of projects for which the Environmental Protection Agency of Montenegro will issue an opinion whether an EIA is needed or not. After the Preliminary Design is completed, CGES will submit a request to the Agency to obtain a Screening Decision which will determine whether an EIA Study is necessary. The Agency will then publicly disclose the request, and inform the public and the CGES of the outcome. If the Agency determines that an EIA Study needs to be developed, the provisions of the Law regarding the consultation process will be followed. This includes mandatory public hearings on the EIA Study.

### 3.1.2 EBRD Requirements

In its ESP 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (Information Disclosure and Stakeholder Engagement) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

EBRD's PR 10 requirements can be summarised as follows:

- The stakeholder engagement process involves **stakeholder identification and analysis**, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- Clients must ensure that stakeholders have **access to timely, relevant and understandable information**, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or

groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.

- The client will undertake **meaningful consultation**, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.
- To respond to stakeholders' concerns related to the project in a timely manner, the client will establish an **effective grievance mechanism** as early as possible in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances.
- Clients are required to **develop and implement a SEP** that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.



## 4 Project Stakeholders

Project stakeholders have been identified and analysed to address the different consultation requirements. Stakeholder mapping was carried out during the development of this SEP based on:

- site visits to the Project area
- discussions with CGES
- review of available Project documentation and media search

The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in section 5.1.3. It should be noted that any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs known, and to facilitate the effective implementation of the SEP:

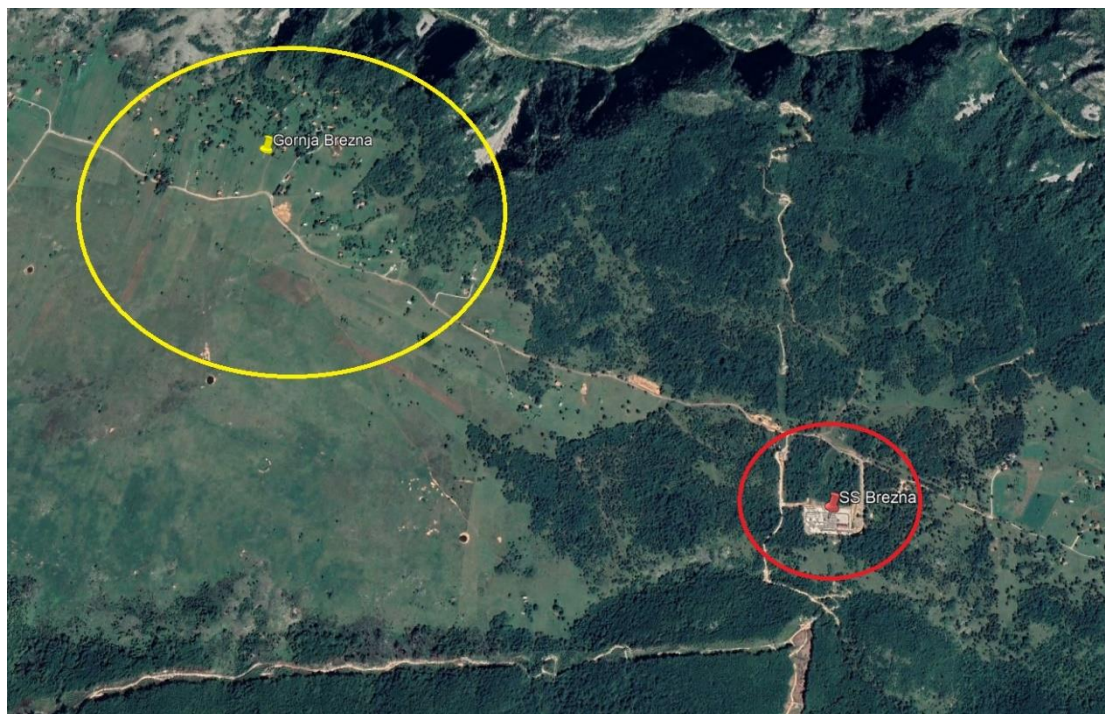
### 1) Landowners to be affected by land acquisition

It will be necessary to acquire several private land plots (adjacent to the existing SS Brezna) with a total area of 3.1 hectares, belonging to multiple individuals residing abroad and currently not used for any purposes. No physical displacement is expected as there are no structures on the land to be acquired.

### 2) Closest communities that may be affected by Project construction

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 2](#)).

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. Increased construction-related traffic may result in traffic congestions, leading to inconveniences for the local community and commuters passing through the area. This may be particularly important for any vulnerable categories of road users such as the pedestrians, cyclists, the elderly and children.



*Figure 2: Distance from the nearest settlement of Gornja Brezna*

### 3) Stakeholders with a general interest in energy projects

This category encompasses a broader spectrum of individuals and organisations that, while not directly affected by the Project, may hold an interest in its outcomes. This includes:

- General population of the region or the country: The wider population is expected to be interested in Project's benefits, given that this Project holds strategic importance for the development of the overall transmission network in the country.
- Environmental NGOs: NGOs, especially those with a focus on environmental sustainability and biodiversity, are expected to be keen observers of the Project, considering they monitor projects regarding the overall transmission network and its impacts. *Note: Even though such organisations have not yet demonstrated a specific interest in this Project, all shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation. Any organisations interested in the Project can send their contact details to the PIU to be included in this SEP and notified directly about Project events.*
- The media: Local and national media outlets play a pivotal role in disseminating information about the Project, shaping public opinion, and keeping people informed about Project updates, benefits, and any potential concerns.

### 4) Contractors or subcontractors for construction, monitoring and supervision of works, and their employees

The contractors or the supervision engineer have not been selected yet but are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.

### 5) CGES employees

CGES employees are a group of stakeholders with an interest in the Project's planning and execution, with emphasis on elements such as ensuring a safe working environment, promoting fair employment practices, and addressing other labour-related issues.

### 6) Relevant government authorities and organisations

These stakeholders include regulatory bodies with oversight and vested interest in the successful completion and operation of the Project:

- *Municipality of Pluzine* – will assist CGES in Project information disclosure
- *Ministry of Ecology, Spatial Planning and Urban Development* – will issue the Urban and Technical Conditions for the Project, followed by the Construction Permit and Use Permit
- *Environmental Protection Agency* – will decide whether an EIA Study needs to be developed for the Project
- *Water Administration of Montenegro* – will issue water approvals for the Project
- *Electrical and Energy Inspection* – will issue the approval to put the SS into trial operation

## 5 Stakeholder Engagement Program

### 5.1.1 Introduction

Communication and information channels have been designed in this SEP taking into account the specific needs of various stakeholder groups. **CGES acknowledges the significance of meaningful and timely engagement with stakeholders to ensure the success of the Project.** Through this engagement process, the PIU aims to gather valuable feedback, comments, and suggestions from stakeholders to enhance the Project's design and maximise local benefits.

### 5.1.2 Previous Stakeholder Engagement

The first consultations started in the period 2015-2018, when the initial environmental and social (E&S) due diligence was carried out for the SS Brezna upgrade. At the time, CGES held a number of engagement events with statutory stakeholders, including discussions with the Montenegrin Environmental Protection Agency and Montenegrin Energy Regulatory Agency, focusing on environmental, financial and regulatory aspects of the project. Additionally, consultations with the Municipality of Pluzine provided critical insights into financial structures, spatial planning and environmental concerns.

In April 2022, CGES submitted to the Energy Regulatory Agency the *Draft Plan for the Development of Montenegro's Transmission System 2023-2032*, which also includes the SS Brezna upgrade project. As required by the national *Ordinance for Preparation and Monitoring of the Implementation of 10-Year Plans for the Development of the Electric Power Transmission System*, the Agency initiated public consultations in the same month, inviting all interested parties to provide opinions, comments and suggestions. A Public Consultation Report was then published by the Agency, according to which comments and suggestions were submitted by EPCG ("Elektroprivreda Crne Gore" Nikšić), CEDIS ("Crnogorski elektrodistributivni sistem" Podgorica), Copenhagen Green Energy A/S, and the Energy Community Secretariat. There were no remarks regarding the SS Brezna upgrade. The Agency issued a decision on approval of the Draft Plan.

### 5.1.3 Planned Information Disclosure and Consultations

Effective stakeholder engagement relies on transparent information disclosure and meaningful consultations. This section details the PIU's strategy and planned activities to keep all stakeholders informed and involved throughout the Project's lifecycle.

#### A. DISCLOSURE OF PROJECT DOCUMENTS

The PIU will disclose the following documents as early as possible in the Project development process:

- this SEP
- the Project Grievance Form ([Appendix 1](#) of this SEP)
- the Non-technical Summary (NTS) of the Project
- the Land Acquisition Plan (LAP) to be developed by CGES

The documents will be publicly available in **Montenegrin** language in electronic and printed forms at:

Name of organisation	Website	Address
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

The disclosure package will also be available on the EBRD website ([www.ebrd.com](http://www.ebrd.com)).

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.

## **B. PUBLIC CONSULTATION MEETINGS**

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.

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:

- Official websites of CGES and Municipality of Pluzine
- Announcements posted in settlements of Gornja Brezna and Donja Brezna
- Local media and newspapers in wide circulation in Municipality of Pluzine
- CGES social media (<https://www.facebook.com/CGESofficial>)

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.

A comprehensive consultation process will be implemented related to the land acquisition process, as to be outlined in the LAP.

## **C. INFORMING THE PUBLIC ABOUT CONSTRUCTION WORKS**

The PIU will commit to providing clear information concerning various facets of planned construction activities. This includes 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.

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).

## **D. INFORMING THE PUBLIC THROUGHOUT OPERATION AND MAINTENANCE**

The results of the stakeholder engagement process will be included in Environmental and Social Reports to EBRD which will be prepared by the PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. A summary of these Environmental and Social Reports will be prepared by the PIU annually to ensure regular reporting to stakeholders, and posted online (without any confidential information) on the CGES website.

### **5.1.4 Engagement Objectives and Methods**

The list of identified stakeholders and specific communication requirements are provided in the table below.

*As noted previously, this list of stakeholders below may not be final, and that any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs and interests known. The SEP will be updated accordingly by the PIU. Suggestions for improvement of proposed communication methods are also welcome and can be sent to the PIU which is open to feedback from stakeholders.*

Table 1: Stakeholder engagement program details

	Identified stakeholder	Specific issues or interests	Communication and engagement activities and efforts	Information and documents to be disclosed
1.	<i>Landowners to be affected by land acquisition</i>	<ul style="list-style-type: none"> <li>Acquisition of private land</li> </ul>	<p><i>During the development and implementation of LAP (in the pre-construction phase):</i></p> <ul style="list-style-type: none"> <li>Providing timely information on land acquisition activities and responses to questions/grievances</li> <li>Developing the LAP based on a census and socio-economic survey</li> <li>Presenting the future LAP, and discussing land acquisition issues and concerns</li> <li>All reasonable efforts will be utilised to properly identify and locate any absent property owners</li> </ul>	<ul style="list-style-type: none"> <li>Information on the land acquisition process (start of the process, decision on public interest, etc.)</li> <li>Information on available grievance mechanism (both the appeal procedures under the Montenegrin Law on Expropriation and the Project-specific grievance mechanism set up in this SEP)</li> <li>Responses to questions/grievances</li> <li>Contents of future LAP</li> </ul>
2.	<i>Closest communities that may be affected Project construction</i>	<ul style="list-style-type: none"> <li>Traffic disturbances due to construction (the only road leading to the SS Brezna passes through Gornja and Donja Brezna) – particularly important for pedestrians, cyclists, the elderly, and children</li> </ul>	<ul style="list-style-type: none"> <li>Access to Project documents</li> <li>Disclosure of information on planned construction works</li> <li>Public consultation meetings and disclosure of comments matrix after the consultations</li> <li>Community grievance mechanism</li> <li>Separate small group discussions as necessary</li> <li>Media/press releases</li> </ul>	<ul style="list-style-type: none"> <li>Project disclosure package</li> <li>Comments matrix (to be prepared after public consultations)</li> <li>Information on the extent, timing and duration of planned works</li> <li>Information on availability of grievance mechanism</li> <li>Information on traffic arrangements and safety issues during construction</li> <li>Summary of Environmental and Social Reports</li> </ul>
3.	<i>Stakeholders with a general interest in energy projects</i>	<ul style="list-style-type: none"> <li>General success of the Project and alignment with international standards</li> </ul>	<ul style="list-style-type: none"> <li>Access to Project documents</li> <li>Media/press releases</li> <li>Public consultation meetings</li> </ul>	<ul style="list-style-type: none"> <li>Project disclosure package</li> <li>Summary of Environmental and Social Reports</li> </ul>



	Identified stakeholder	Specific issues or interests	Communication and engagement activities and efforts	Information and documents to be disclosed
4.	<i>Contractors or subcontractors for construction, monitoring and supervision of works, and their employees</i>	<ul style="list-style-type: none"> <li>Health and safety, labour and working conditions</li> <li>Environmental setting and impacts, road and traffic safety</li> </ul>	<ul style="list-style-type: none"> <li>Information through contracting</li> <li>Trainings and inductions before mobilisation</li> <li>Communication via supervising engineers</li> <li>Toolbox talks at construction sites on health and safety, Chance Find Procedure, and other topics</li> <li>Regular reports on progress of works submitted during construction works</li> <li>Workers' grievance mechanism</li> </ul>	<ul style="list-style-type: none"> <li>Work safety and health regulations, environmental protection requirements</li> <li>Information on workers' grievance mechanism</li> </ul>
5.	<i>Employees of CGES</i>	<ul style="list-style-type: none"> <li>Involvement in Project planning and implementation, safe working conditions (during operation and maintenance), fair employment practices and other labour related issues</li> </ul>	<ul style="list-style-type: none"> <li>Company's internal communication channels</li> <li>Trainings as necessary</li> </ul>	<ul style="list-style-type: none"> <li>Information about the planned Project activities</li> </ul>
6.	<i>Relevant government authorities and organisations:</i> <ul style="list-style-type: none"> <li>Municipality of Pluzine</li> <li>Ministry of Ecology, Spatial Planning and Urban Development</li> <li>Environmental Protection Agency</li> <li>Water Administration of Montenegro</li> <li>Electrical and Energy Inspection</li> </ul>	<ul style="list-style-type: none"> <li>Issuing permits, consents and opinions in accordance with local legislation</li> <li>Monitoring of compliance with local legislation</li> </ul>	<ul style="list-style-type: none"> <li>Official communication channels</li> <li>Consultations with relevant government authorities in the framework of permitting procedures</li> <li>Reporting and monitoring based on local legislation requirements</li> <li>Timely communication with public utility companies in case of any accidental utility disruptions</li> </ul>	<ul style="list-style-type: none"> <li>Information on Project activities in the formats and as required by local legislation</li> </ul>

## 6 Grievance Management

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### Overview

The PIU is striving to ensure that the upgrade of SS Brezna will not result in adverse impacts for local communities or for other potentially affected stakeholders. The PIU understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A Project-level grievance mechanism has been set up as a process for receiving, evaluating and addressing grievances. The PIU will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

Both the PIU and the contractors/supervision engineers on site will accept grievances associated with the Project. The PIU will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below.

This chapter includes the following supporting appendices: Project Grievance Form ([Appendix 1](#)), template of the Grievance Registry ([Appendix 2](#)), and template of the Stakeholder Engagement Registry ([Appendix 3](#)).

The following sections of this chapter elaborate the Project grievance procedure and steps. Note: A separate grievance mechanism is available for workers.

### Submitting grievances

Any concerns can be brought to the attention of PIU verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of construction works, the Project Grievance Form may also be submitted directly to the contractor for construction works or the supervision engineer, which will forward any such received grievances to PIU without delay (within 24 hours) to allow PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

The information boards to be placed at the construction site will 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).

### Recording and acknowledging grievances

The PIU will record all grievances in a Grievance Registry (format provided in [Appendix 2](#)), separate from the Stakeholder Engagement Registry ([Appendix 3](#) of this SEP), which details interactions with communities and stakeholders.

All grievances will be recorded by PIU in the registry and assigned a number. Written and non-anonymous grievances will be acknowledged within 5 working days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- **description of grievance, including an indication of the type (topic) of the grievance** – such as grievances related to traffic disruptions, inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- **details about the complainant profile** (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project – *note: this information will be considered confidential and only disclosed to PIU staff working on grievances,*
- **date of receipt of grievance and date of acknowledgement returned** to the complainant,
- **description of actions taken** (investigation, corrective measures, preventive measures), and

- **date of resolution and closure/provision of feedback** to the complainant, including recording of level of satisfaction with the proposed resolution (see grievance close-out form below).

### **Assisting complainants**

If the grievance is vague and not clear enough, the PIU will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

### **Grievance resolution**

The PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, the PIU will validate complainant satisfaction through providing a grievance close-out form for the resolved grievance to be signed by the complainant (if the complainant agrees) and the PIU to attest to their mutual satisfaction. The PIU will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

If the PIU is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/justification on why the issue was not addressed. The response will also contain an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

*Note: At all times, complainants may seek other legal remedies in accordance with the local legislation, including formal judicial appeal.*

### **Contact information for sending inquiries or grievances:**

<p style="text-align: center;"><b>SS BREZNA UPGRADE PROJECT</b>  <b>CGES - Project Implementation Unit</b>  Address: Bul. Sv. Petra Cetinjskog 18  Tel.: +382 20 407-682  E-mail: office@cges.me</p>
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### **EBRD's Independent Project Accountability Mechanism**

In addition to the Project-level mechanism managed by the PIU, the EBRD's Independent Project Accountability Mechanism<sup>3</sup> (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

<sup>3</sup> Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

## 7 Monitoring and Reporting

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The results of the stakeholder engagement process will be included in Environmental and Social Reports to EBRD which will be prepared by the PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism. A summary of these Environmental and Social Reports will be prepared by the PIU annually to ensure regular reporting to stakeholders and posted online (without any confidential information) on CGES's website.

The reports will include, in particular, the following information:

- **Number and types (topics) of received community grievances** raised in the reporting period (e.g., grievances related to traffic disruptions, inadequate storage of construction materials and equipment etc.), with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism;
- **Number and types of information disclosure activities** through the media and official websites;
- **Place and time of consultation meetings held and other types of engagement activities**, with information on the number of participants, issues and concerns raised during meetings and information on how the issues raised were taken into consideration by the PIU.

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD and the public.

[Appendix 3](#) of this SEP provides a template for tracking stakeholder engagement activities.

## Appendix 1: Public Grievance Form

<b>Reference Number</b>	<b>(to be completed by the Project)</b>
<b>Full name (optional)</b> <ul style="list-style-type: none"> <li>• I wish to raise my grievance anonymously.</li> <li>• I request that you do not disclose my identity without my consent.</li> </ul>	
<b>Contact information</b>  Please mark how you wish to be contacted (mail, telephone, e-mail).	<b>By Post: Please provide mailing address:</b> _____ _____ <b>By Telephone:</b> _____ <b>By E-mail</b> _____
<b>Preferred language of communication</b>	- Montenegrin/Serbian - English (if possible) - Other _____
<b>Description of Incident for Grievance</b>	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
<b>Date of Incident / Grievance</b>	
	<ul style="list-style-type: none"> <li>• One-time incident/grievance (date _____)</li> <li>• Happened more than once (how many times? _____)</li> <li>• On-going (currently experiencing problem)</li> </ul>
<b>What would you like to see happen?</b>	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

*Please return this form to:*

**SS BREZNA UPGRADE PROJECT**  
**CGES - Project Implementation Unit**  
 Address: Bul. Sv. Petra Cetinjskog 18  
 Tel.: +382 20 407-682  
 E-mail: [office@cges.me](mailto:office@cges.me)



## Appendix 2: Grievance Registry – Template

Note: Any personal data will be processed in line with Montenegrin regulations on personal data protection.

	Name of complainant	Complainant profile	Contact information	Date received	Date acknowledged	Type (topic) of problem	Responsible person or department	Grievance description	Proposed solution	Due date for action	Results of intervention	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/ notes
1.	<i>Enter name or 'anonymous'</i>	<i>Gender, age, location and vulnerabilities if known</i>				<i>E.g., noise, dust, gender-based violence and harassment</i>										
2.																
3.																
4.																
5.																

### Appendix 3: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with Montenegrin regulations on personal data protection.

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	<i>(E.g., affected resident, cultural or religious institution...)</i>	<i>(E.g., official meeting, presentation, informal meeting...)</i>				
2.						
3.						
4.						
5.						