



Technical DD update and Environmental and Social
Assessment

Educational Buildings Energy Efficiency Renovation
Projects in Montenegro – Phase II

Technical DD update and Environmental and Social Assessment
Educational Buildings Energy Efficiency Renovation Projects in Montenegro
Phase II

final

STAKEHOLDER ENGAGEMENT PLAN (SEP)

21st November 2025

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List of Abbreviations

ACM	Asbestos-Containing Materials
EBRD	European Bank for Reconstruction and Development
GBVH	Gender-based Violence and Harassment
Ministry	Ministry of Education, Science and Innovation
NTS	Non-technical Summary
SEP	Stakeholder Engagement Plan
PIU	Project Implementation Unit
ESR	(EBRD's) Environmental and Social Requirements
EE	Energy Efficiency
RE	Renewable Energy

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
Stakeholders	Stakeholders are those: <ol style="list-style-type: none"> 1) who are affected (directly or indirectly, positively or negatively) by a project, including those who might be particularly <i>vulnerable</i> to project impacts 2) who may have an interest in, or may otherwise influence, the project, but are not affected by it
Stakeholder mapping	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.
Stakeholder engagement	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.
Stakeholder Engagement Plan (SEP) – <i>this document</i>	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 EBRD's Environmental and Social Policy.
Grievance mechanism	A non-judicial process managed by the project implementor for receiving, acknowledging, investigating and responding to Project-related grievances. 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. <i>See Chapter Error! Reference source not found. for details about the grievance mechanism.</i>
Vulnerable people or groups	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

This Stakeholder Engagement Plan (SEP) was prepared for the purpose of project implementation, whereby it is going to be implemented by the Ministry of Education, Science and Innovation ("the Ministry") and it is going to be used as a set of guiding principles which are to be implemented on project level so as to ensure full information disclosure, transparency and accountability in stakeholder engagement.

2.1 Project context

EBRD is considering providing a sovereign loan to the Government of Montenegro for financing energy efficiency (EE), renewable energy (RE), accessibility and safety enhancements in 24 kindergartens in 10 municipalities in Montenegro (the "Project"):

- | | |
|----------------|--------------|
| 1. Bar | 6. Niksic |
| 2. Budva | 7. Mojkovac |
| 3. Herceg Novi | 8. Podgorica |
| 4. Kotor | 9. Pljevlja |
| 5. Kolasin | 10. Zeta |

The Project is categorised "B" in accordance with the EBRD Environmental and Social Policy (ESP) (2024). It is expected that the Project will have significant positive environmental and social benefits from improved energy efficiency of the existing educational buildings, however there may also be potential existing impacts and risks which will be considered and elaborated in the further steps.

The Consultant undertook to develop an Environmental and Social (E&S) Assessment of both the Project and the Client's existing operations, as well as an updated technical assessment for all 24 buildings within the project scope. These enhancements will be managed by the Ministry" Environmental and Social documentation was carried out after completion of Feasibility Study for the Project.

Recent statements:

Following the completion of the Feasibility Study, and during the preparation of the Environmental and Social Management Plan (ESMP), the Ministry has formally communicated modifications to the project scope, reflecting evolving institutional needs and technical findings of the Feasibility Study.

These adjustments include the following:

1. Two facilities initially included only for EE measures – Đina Vrbica – Educational Unit Zvoncic and Đina Vrbica – Educational Unit Đina Vrbica – have now been proposed for facility expansion (new construction), in addition to energy efficiency measures:
 - > For Zvoncic (current size ~1,000 m²), expansion of up to 4,000 m² (G+1) is technically feasible and is now proposed.
 - > For Đina Vrbica (current size ~1,750 m²), expansion of at least 3,500 m² is proposed. Since this facility lies in an area without a valid urban plan, the project will proceed on the basis of Urban-Technical Conditions, to be adopted by the Government of Montenegro, upon proposal by the Ministry of Spatial Planning, Urbanism, and State Property.

- > The final surface areas of the new buildings will be determined based on available loan funds, preschool design standards, and institutional needs.
2. The kindergarten in Petrovac, originally listed, will not be included in this phase due to its prefabricated structure, which is not suitable for deep energy efficiency upgrades.

Despite the fact that the Ministry has subsequently provided an update in relation to their decision about the project scope, this document provides comprehensive information about all 24 objects which were initially included in the scope of the Project, since the Consultant did carry out assessment of each initially defined object, as defined in ToR. Additionally, it is important to take into account the conditions of all objects, as initially defined, as some of the indicators (which were already initially identified in the Feasibility Study), were taken into account during the Ministry's decision-making process. In line with the above, the table below provides a detailed overview of all EBs defined in ToR and their status.

Project buildings are spread throughout entire Montenegro, covering both the continental and coastal regions of the country. The names of kindergartens, municipalities, and the locations of the Project buildings are presented in Table 1 below.

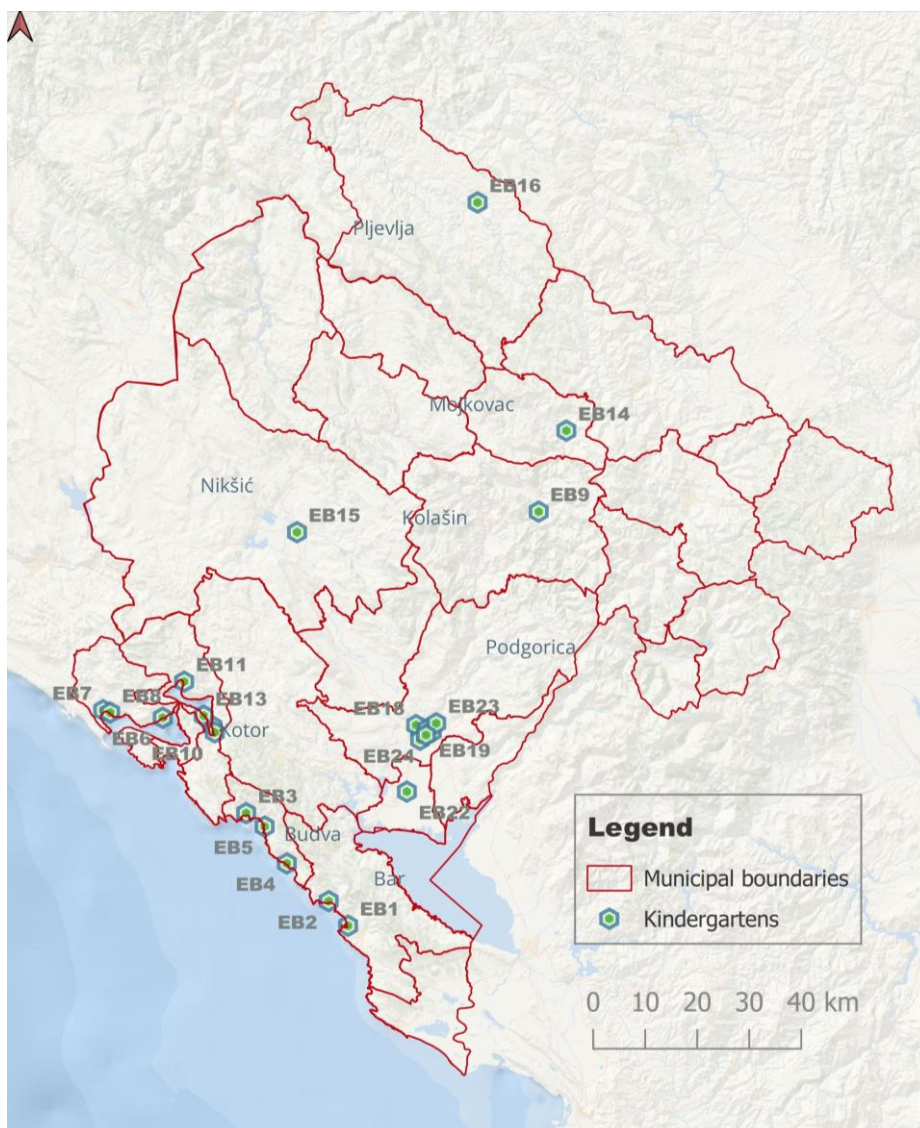
Table 1: Educational Buildings locations and general details

ID.	Site name	Site location	Building dimension	Building structure	Year of con.
EB1	JPU "Vukosava Ivanovic-Masanovic" - Educational unit "Delfin"	Topolica	450 m ² gross building area	Ground floor	1971
EB2	JPU "Vukosava Ivanovic-Masanovic" - Educational unit "Mala sirena"	Sutomore	550 m ² gross building area (including terraces)	Ground floor	1981
EB3	JPU "Ljubica V. Jovanovic - Mase" - Educational unit Novi vrtic	Budva	1,148 m ² gross building area	Ground floor + first floor	2010
EB4	JPU "Ljubica V. Jovanovic - Mase" - Educational unit Petrovac	Petrovac	1,170 m ² gross building area	Ground floor	1980
EB5	JPU "Ljubica V. Jovanovic - Mase" - Educational unit Sveti Stefan	Sveti Stefan	458 m ² gross building area	Ground floor	1980
EB6	JPU "Nasa radost" - Educational unit Bijela	Bijela	650 m ² gross building area	Ground floor	1978, extended in 1986
EB7	JPU "Nasa radost" - Educational unit Igalo	Igalo	1,482 m ² gross building area	Ground floor	1980
EB8	JPU "Nasa radost" - Educational unit Topla	Topla	920 m ² gross building area	Ground floor + first floor	1976
EB9	JPU "Sestre Radovic"	Kolasin	926 m ² gross building area	Ground floor + first floor	1974, extended in 1988
EB10	JPU "Radost"	Kotor	1,152 m ² gross building area	Ground floor + first floor	Unknown

ID.	Site name	Site location	Building dimension	Building structure	Year of con.
EB11	JPU "Radost"	Risan	290 m ² gross building area	Ground floor	Unknown
EB12	JPU "Radost"	Dobrota	620 m ² gross building area	Ground floor + first floor	1966, extension in 1978
EB13	JPU "Radost"	Prcanj	390 m ² gross building area	Basement + Ground floor	1977
EB14	JPU "Jevrosima Jevra Rabrenovic"	Mojkovac	1,000 m ² gross building area	Ground floor + first floor	1960, extended in 1986
EB 15	JPU "Dragan Kovacevic"	Niksic	1,091 m ² gross building area	Ground floor	1975
EB16	JPU "Eko bajka"	Pljevlja	1,394 m ² gross building area	Ground floor + first floor	1978, extended in 1987
EB17	JPU Ljubica Popovic – administrative unit	Podgorica	1,550 m ² gross building area	Ground floor + first floor	1969, extended in 1997
EB18	JPU Ljubica Popovic – Educational unit Sunce	Podgorica	1,446 m ² gross building area	Ground floor	1990
EB19	JPU Đina Vrbica - Educational unit Bubamara	Podgorica	582 m ² gross building area	Ground floor + first floor	1960, extended in 1979
EB20	JPU Đina Vrbica - Educational unit Jelena Cetkovic	Podgorica	820 m ² gross building area	Ground floor	1973
EB21	JPU Đina Vrbica - Educational unit Poletarac	Podgorica	1,446 m ² gross building area	Ground floor	1990
EB22	JPU Đina Vrbica - Educational unit Zvezdani vrt	Golubovci	1,967 m ² gross building area	Ground floor	2013
EB23	JPU Đina Vrbica - Educational unit Zvoncic	Podgorica	1,004 m ² gross building area	Ground floor	1982
EB24	JPU Đina Vrbica - Educational unit Đina Vrbica	Podgorica	1,750 m ² gross building area	Ground floor	1976, extended in 1990

Note: EB23 - EE + Facility Expansion (up to ~4,000 m²) and EB24 - EE + Facility Expansion (at least ~3,500 m²)

Figure 2.1: Spatial representation of the project's kindergartens in Montenegro



Project benefits: The implementation of the Project is expected to deliver several environmental and social (E&S) benefits, such as reduced energy consumption and greenhouse gas emissions, improved indoor comfort, increased resource efficiency, and lowered operating costs. Additionally, the Project will enhance the safety of buildings through planned non-energy efficiency (non-EE) measures, generate local employment opportunities, and contribute to the goals outlined in Montenegro's Nationally Determined Contribution and strategic documents, primarily Climate Change Strategy and Energy Development Strategy.

Categorisation: The Project is categorised “B”¹ in accordance with EBRD’s Environmental and Social Policy 2024.

¹ An EBRD 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.

Implementation arrangements: The Ministry will be responsible for the preparation and implementation of the Project. The Project will be managed by a Project Implementation Unit (PIU), consisting of Ministry representatives. The PIU will be responsible for entire Project implementation including stakeholder engagement. A PIU Support Consultant will be engaged to provide expertise in tendering procedures, E&S monitoring and overall Project reporting. At the time of drafting this document, PIU had not yet been established. According to representatives of the Ministry, the PIU is expected to be established in the first quarter of 2026.

Additionally, the Ministry will establish a working group comprising representatives from the Ministry, the involved kindergartens, and the municipalities. The working group will be established as soon as possible, and no later than during the preparation of the tender documentation. It will meet at least once a month to coordinate the steps and timeline for the execution of works in the involved kindergartens. Moreover, according to the 2024 Feasibility Study, the Ministry will establish an Energy Management Team consisting of personnel engaged by the Ministry. This team will be responsible for monitoring and managing energy efficiency systems in kindergartens, as well as providing training and capacity building for caretakers and kindergarten staff (*e.g., operating and monitoring photovoltaic (solar) panels, proper ventilation management, etc.*).

Project development status: The Project is currently in its preparatory phase. During 2024, EBRD funded the implementation of EE audits and the development of a Feasibility Study for the 23 kindergarten buildings. The Main Designs for the Project is yet to be developed. In 2025, an independent E&S assessment of the Project was undertaken by independent consultants commissioned by EBRD. This Stakeholder Engagement Plan is part of the Project's disclosure package developed during the assessment, together with the Non-technical Summary which provides a more detailed description of the Project.

Project measures: In the 2024 Feasibility Study, the following measures are proposed for implementation:

- > TI reconstruction of pitched roof (20cm rock wool)
- > Reconstruction of flat roof (20cm rock wool)
- > TI reconstruction of façade (15cm rock wool)
- > Window/door replacement
- > VRF system/Heat pump
- > Smart lighting
- > Electrical installations
- > PV system
- > Construction of new buildings

2.2 Objectives and Scope of Stakeholder Engagement Plan

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 will be implemented by the Ministry/PIU in order to clearly communicate to all interested and affected parties its stakeholder engagement program.

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

Note: No specific stakeholder engagement activities have yet been undertaken by the Ministry. All future activities will be guided by this SEP.

3 Regulatory Requirements for Stakeholder Engagement

3.1 National requirements

The following specific laws in Montenegro with requirements regarding disclosure and transparency will be applicable to the Project:

- > The *Law on Free Access to Information of Public Interest*² states that public authorities are required to provide each person with the possibility of receiving and becoming acquainted with information of public interest, except in cases anticipated by law.
- > The *Media Law*³ stipulates that public information is free and is not subject to censorship, and that the public has the right and interest to be informed on issues of public interest.

Montenegro has also ratified the Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters. The Convention applies both to government organisations but also any other natural or legal persons having public responsibilities or functions, or providing public services.

There are no other local requirements on stakeholder engagement applicable to this Project that are comparable to EBRD requirements elaborated below.

² (Government of Montenegro)

³ (Government of Montenegro)

3.2 EBRD requirements

In its Environmental and Social Policy 2024⁴, EBRD has defined a comprehensive set of specific Environmental and Social Requirements (ESRs) that projects are expected to meet. ESR 10 (Stakeholder Engagement) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

EBRD's ESR 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 (European Bank for Reconstruction and Development, 2024)

4 Project Stakeholders

Project stakeholders have been identified to address the different consultation requirements. Stakeholders include persons or groups that are:

- > directly and/or indirectly affected by the Project;
- > have certain interests in the Project and its activities; or
- > have the ability to affect the Project itself and its final outcome.

Stakeholder mapping was carried out during the development of this SEP based on site visits to all 24 kindergartens. The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in the next chapter. It should be noted that any stakeholders not identified at this stage of the Project (such as any non-governmental organisations interested in the Project that have not been identified at this stage) may directly contact the Ministry/PIU to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

1) Users/children/staff within the kindergartens

Relocating users and staff during construction works will be feasible for the majority of kindergartens involved in the Project. This will require careful planning and significant resources, and will be implemented in coordination with the local authorities and the Ministry. As such, the preferred approach for most kindergartens will be to carry out construction works throughout the year without disrupting regular operations. Relocating the users and staff eliminates any health and safety risks.

Most kindergartens have the capacity or necessary conditions to support temporary relocation. For those kindergartens where relocation to other facilities is not feasible, construction works will be carried out in a way that does not disrupt the institution's daily operations. This will include performing work outside of regular working hours, on weekends, and during public holidays. The selected contractor will be required to hold weekly meetings with kindergarten management to coordinate the timing and scope of the work.

The Ministry will inform all kindergartens at least two months in advance of the planned start date and will provide the contact details of the selected contractor.

In kindergarten, which will remain operational during construction, carrying out works near users and staff can pose significant health and safety risks, such as the following:

- > Refurbishment works involving loud machinery could elevate noise levels in and around the kindergartens.
- > Dust and particulate matter from demolition and drilling could contaminate the air without effective management.
- > Activities such as painting and flooring can release volatile organic compounds (VOCs) and chemical fumes.
- > Unpleasant odours may arise from construction materials and processes.

- > Electrical system overhauls pose risks of shocks or fires if safety protocols are not strictly followed.

Works that may cause the above-mentioned impacts shall only be conducted during periods when the kindergartens involved are not occupied by children.

Users(children) of kindergartens are a particularly sensitive (vulnerable) category who may have increased sensitivity to factors such as noise, dust and other challenges associated with ongoing construction activities. Construction activities may result in increased traffic congestion and closures of access paths, potentially affecting access to the kindergarten and causing inconveniences for users/children and staff. The significance of this potential risk is minimal since these facilities have multiple access paths, and construction works will be planned for periods when users/children are not present.

To mitigate the impact of indoor air emissions during construction works, various mitigation measures such as dust control, the use of low-VOC materials, and regular cleaning will be implemented. To enhance coordination throughout the construction period, the Ministry/PIU will establish a *Communication and Coordination Procedure* to include a formal coordination procedure among construction managers and representatives of kindergarten, outlining the processes for scheduling, executing and supervising construction activities, with a special emphasis on coordinating noisy construction works; weekly meetings of kindergartens staff to discuss works planned for each week, allowing class teachers to prepare for any disruptions or relocation of children to other classrooms if feasible, and ensuring that facility's staff are regularly informed about potential health and safety issues and providing updated on EE measures being implemented as well as instructions on handling any safety incidents related to the works. Additionally, a Traffic Management Plan will be developed to mitigate traffic congestion and ensure unobstructed emergency evacuation routes.

In the courtyard of two kindergartens (*Podgorica and Risan*), there are separate buildings owned by the state, with the right of use granted to the kindergartens. Two employees (a caretaker and a former caretaker) reside in these buildings. Although these buildings are not part of the Project, they share the courtyard with the kindergartens, including access routes and entrances. The Ministry and the kindergarten management will hold separate meetings with these families at the respective facilities before the tender is announced to inform them about the Project, its potential impact, and to address any concerns they may have.

2) Relevant government authorities

The process of obtaining national permits and authorisations for each building will depend on the final scope of work (to be defined after the development of the Main Designs), i.e., the categorisation of planned activities as remodelling or reconstruction. If the Project activities are confirmed as remodelling, the legal process will involve submitting applications to the Ministry of Spatial Planning, Urbanism and State Property for approval. For Project buildings that are under cultural heritage protection, it will be necessary to notify the Administration for the Protection of Cultural Assets of Montenegro about the works) will be necessary. In case of reconstruction, a more extensive set of permits and approvals will be required, including Urban-Technical Conditions, Conservation Conditions), Contractor Permits, etc. No local Environmental Impact Assessment will be required.

Furthermore, for all Project buildings, it will be necessary to obtain confirmation from the competent state authorities regarding whether any of the building facades or parts of facades are subject to intellectual property rights. For those buildings determined to be under intellectual property protection, the legal process will require contacting the holders of these rights during the development of the Main Design. In case of reconstruction, a more extensive set of permits and approvals will be required, including Urban-Technical Conditions.

3) 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.

The challenges for contractor's workers in all Project buildings will involve general construction risks. A specific issue will be handling of asbestos-containing waste. To address this, a comprehensive survey of asbestos-containing materials (ACMs) was conducted in all Project buildings as part of the ESDD package preparation. The findings of the survey have been published in the same manner as this SEP. Where ACMs are identified, an ACM Management Plan will be developed where applicable.

5 Stakeholder Engagement Program

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

5.1 Structural integrity and seismic safety of buildings

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

- > this SEP, the Public Grievance Leaflet ([Appendix 1](#) of this SEP) and Project Grievance Form ([Appendix 2](#) of this SEP), and
- > the Non-technical Summary (NTS) of the Project.

The documents will be publicly available in Montenegrin and English in electronic and printed forms on the website of the Ministry of Education, Science and Innovation (<https://www.gov.me/mps>) and its physical address (Vaka Đurovića BB, Podgorica, Montenegro). The Ministry/PIU will also ensure that all involved kindergartens publish the link with the documents on their websites.

After the disclosure of the documents listed above, stakeholders will have a period of 1 month to provide feedback (their opinions and suggestions with regard to the Project). To encourage feedback, the Ministry/PIU will (in parallel with disclosure) publish on the Ministry's website and ensure that all kindergartens publish on their websites a notification with the contact person details of the Ministry/PIU, as well as the timeframe for sending feedback. PIU contact information is provided in [Chapter Error! Reference source not found.](#) of this SEP.

All comments and proposals will be considered by the Ministry/PIU. A brief report ("comments matrix") on comments/proposals received and responses from the Ministry/PIU will be published on the Ministry's website following the public review period.

5.2 Informing the Public about Construction Works

The Ministry/PIU will commit to providing clear information about the planned construction activities. This will be ensured through publication of a notice detailing the start and duration of the works, accompanied by the Public Grievance Leaflet and the Project Grievance Form, at least 30 days before the start of works through:

- > the websites of the Ministry and the involved kindergartens;
- > displaying the notice at the entrances to the kindergartens;
- > publication in the media.

5.3 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 any stakeholders not identified at this stage of the Project may directly contact the Ministry/PIU to make themselves and their needs and interests known. The SEP will be updated accordingly by the Ministry/PIU. Suggestions for improvement of proposed communication methods are also welcome and can be sent to the Ministry/PIU which is open to feedback from stakeholders.

Table 2: Engagement objectives and methods

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
Users/children/staff within kindergartens	Construction-related concerns related to Increased traffic or traffic congestion, and restricted access to buildings/facilities. Health and safety of users/children and staff, if not properly managed, such as air contamination from demolition and drilling operations, heightened noise levels within the kindergartens due to loud machinery and works, unpleasant odours or electrical accidents during overhauls of electrical distribution systems.	<ul style="list-style-type: none"> Access to Project documents online and in printed form, and opportunity to provide feedback to the Project documents Ensuring that each facility's staff are regularly informed about potential H&S issues and providing updated on EE measures being implemented as well as instruction on handling any safety incidents related to the works in line with the Communication and Coordination Procedure to be established for the Project by the Ministry/PIU Notice detailing the start and duration of the works and containing information on the grievance mechanism displayed at the entrances to the kindergartens Responding to inquiries/ grievances through the Project grievance mechanism (see Chapter Error! Reference source not found.) Information boards (including information on grievance mechanism) to be placed by the contractor at Project building entrance 	<ul style="list-style-type: none"> Project disclosure package (SEP, NTS, Public Grievance Leaflet, Grievance Form) and comments matrix published on the Ministry website Information provided to kindergartens staff about potential H&S issues and updates on EE measures being implemented as well as instructions on handling any safety incidents related to the works Information on the extent, timing and duration of planned works Information on grievance mechanism
Relevant government authorities (Ministry of Spatial Planning, Urbanism and State Property – Directorate for Inspection Supervision and Licenses; Administration for the Protection of Cultural Assets)	Issuing permits, consents and opinions in accordance with national legislation, control of compliance with national legislation	<ul style="list-style-type: none"> Official communication channels Consultations with government authorities in the framework of permitting procedures Monitoring based on national legislation requirements 	<ul style="list-style-type: none"> Information on Project activities, permitting requirements, monitoring/audit reports, other national legislation requirements and relevant information
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees	Health and safety; implementation of Asbestos-Containing Material Management Plans in relevant buildings, labour and working conditions; environmental setting and impacts	<ul style="list-style-type: none"> Regular communication with representatives of kindergartens (manger, secretaries, etc.) Information through contracting Toolbox talks at construction sites on gender-based violence and harassment (GBVH), health and safety topics Workers' grievance mechanism 	<ul style="list-style-type: none"> Coordination procedure among construction managers and representatives of kindergartens (manger, secretaries, etc.) Work safety and health regulations, environmental protection



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Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
			<ul style="list-style-type: none">Information on workers' grievance mechanism

6 Grievance Management

Overview

The Ministry/PIU is striving to ensure that the implementation of the Project will not result in adverse impacts for users/children, kindergarten staff or for other potentially affected stakeholders. The Ministry/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 Ministry/PIU will implement the mechanism to ensure that it is responsive to any concerns and complaints. The mechanism will address concerns promptly and effectively in a transparent manner, free from manipulation, interference, coercion, discrimination, intimidation and retaliation, and it will be accessible to all affected parties, at no cost.

This chapter includes the following supporting appendices:

- > Text for Public Grievance Leaflet (Appendix 1),
- > Project Grievance Form (Appendix 2) and
- > Template of the Grievance Registry (Appendix 3).

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

Visibility of the grievance mechanism

The visibility of the grievance mechanism will be ensured through:

- > As early as possible in the Project development process: disclosing the Public Grievance Leaflet and Project Grievance Form through the websites of the Ministry and the involved kindergartens.
- > Prior to the start of construction, ensure that all kindergartens prominently display a notice detailing the start and duration of the works on their main entrances, as well as the Public Grievance Leaflet and Project Grievance Form.
- > Once construction starts, placing information boards (by the contractor) and grievance boxes at all kindergartens' entrances to clearly display Ministry/PIU contact information for grievances.

Submitting grievances

Any concerns can be brought to the attention of the Ministry/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). 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 or the supervision engineer, which will forward any such received grievances to the Ministry/PIU without delay (within 24 hours) to allow Ministry/ PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

Recording and acknowledging grievances

The Ministry/PIU will record all grievances in the Grievance Registry. Written, anonymous and non-anonymous grievances will be acknowledged within 5 calendar 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** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as:
 - > grievances related to any gender-based violence and harassment
 - > grievances related to other construction nuisances such as improper waste management, noise dust, etc.
- > details about the **complainant profile**, to understand who and where is most affected by negative impacts of the Project (*note: this information will be considered confidential and only disclosed to Ministry/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)
- > **date of resolution and closure**/provision of feedback to the complainant

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 Ministry/PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the Ministry/PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action may be identified if relevant. The complainant will be informed about the proposed immediate action or any long-term action within 10 calendar 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. The Ministry/PIU will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

If the Ministry/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, if relevant, an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

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

Ministry/PIU contact information is:

Education Energy Efficiency Project in Montenegro – Project Implementation unit

Email: kabinet@mpni.gov.me

Tel: +382 20 410 100

Address: Vaka Đurovića bb, 81000, Podgorica

Website: www.gov.me/mps

EBRD's Independent Project Accountability Mechanism (IPAM)

In addition to the Project-level mechanism managed by the Ministry/PIU, the EBRD's Independent Project Accountability Mechanism⁵ (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 Environmental and Social Policy 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.

⁵ 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

The results of the stakeholder engagement process will be included in **Environmental and Social Reports to EBRD** which will be prepared by the Ministry/PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance, and implementation of the external grievance mechanism.

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

- > **Number and types (topics) of received grievances** raised in the reporting period by **type (topic) of the grievance** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as: grievances related to any gender-based violence and harassment, grievances related to other construction nuisances such as improper waste management, noise, dust, etc.
- > **Number and types of information disclosure and engagement activities** through all channels, with information on issues and concerns raised and information on how the issues raised were taken into consideration by the Ministry/PIU.

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

8 References

European Bank for Reconstruction and Development. (2024, October). Environmental and Social Policy.

Government of Montenegro. The Law on Free Access to Information of Public Interest . *Official Gazette of Montenegro, no. 044/12 and 030/17*

Government of Montenegro. The Media Law. *Official Gazette of Montenegro, no. 044/12 and 030/17*

9 Appendices

9.1 Appendix 1: Text for Public Grievance Leaflet

The Project Implementation Unit (PIU) is striving to ensure that the establishment and development of the **Education Energy Efficiency Project in Montenegro** will not result in adverse impacts for visitors/users/staff within the Project buildings. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities.

What kind of grievance can I lodge? Anyone can lodge a grievance if they feel that Project activities are negatively affecting them or their local environment. Examples of grievances could include, but are not limited to:

- > Increased noise, access issues or other nuisances during construction works within the Project buildings
- > Concerns about the environment or health and safety issues due to improper waste management, noise or dust around or near kindergartens
- > Practices that endanger the health, safety and security of employees working on the Project
- > Inadequate implementation of the Project's Stakeholder Engagement Plan by the PIU

How can I submit a grievance? Anyone can submit a grievance to the PIU (contact information given below) or the contractor/supervision engineer (once construction starts) without any costs incurred to the complainant, in the following ways:

- a. verbally (in person or by telephone)
- b. in writing by filling in the attached Project Grievance Form or in other form if preferred, and sending it by personal delivery, post or e-mail

Contact information:

Education Energy Efficiency Project in Montenegro - Project Implementation Unit

Email: kabinet@mpni.gov.me

Tel: +382 20 410 100

Address: Vaka Đurovića BB, 81000 Podgorica

Website: www.gov.me/mps

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, the PIU will ensure that your name and contact details are not disclosed without your consent and only the PIU team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

How will the PIU deal with my grievance? The PIU will go through the following steps to deal with your grievance:

- A. The PIU will contact you (if you submitted a non-anonymous grievance) to acknowledge your grievance within 5 calendar days. It will include your grievance reference number as recorded in the Grievance Registry, the person responsible for tracking your grievance and his/her contact information. If the grievance is vague and not clear enough, the PIU will assist you and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer.
- B. The PIU will make all reasonable efforts to address the complaint and will set up an investigation into your grievance. We may need to contact you during this step for further information.
- C. You will be contacted within 10 calendar days upon the acknowledgement of grievance. If the investigation finds that your grievance is justified, we will notify you of the immediate corrective action undertaken or potentially the identified long-term corrective action if relevant. If the grievance does not relate to the Project activities or that no relevant national and international standards have been breached in relation to the grievance or if we are not able to address the issue you raised, we will explain this to you in writing.
- D. The PIU may contact you at a later stage to check that the Project activities pose no further problems.

9.2 Appendix 2: Project Grievance Form

Reference Number	
Full name (optional) > I wish to raise my grievance anonymously. > I request that you do not disclose my identity without my consent.	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail: _____
Preferred language of communication	- Montenegrin - English (if possible) - Other _____
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	
	> One-time incident/grievance (date _____) > Happened more than once (how many times? _____) > On-going (currently experiencing problem)
What would you like to see happen?	

Signature: _____

Date: _____

Please return this form to:

Education Energy Efficiency Project in Montenegro
Project Implementation Unit

Email: kabinet@mpni.gov.me

Tel: +382 20 440-100

Address: Vaka Đurovića BB, 81000 Podgorica

website: www.gov.me/mps



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9.3 Appendix 3: Grievance Registry – Template

Note: Any personal data will be processed in line with the Montenegro Law on Personal Data Protection.

No.	Name of complainant	Complainant profile	Contact information	Date received	Date acknowledged	Type (topic) of problem	Responsible kindergarten teacher	Grievance description	Proposed corrective action (immediate or long-term)	Due date for action	Results of action	Date of closure	Grievance follow-up	Recurrence (Y/N)	Notes
1.	Enter name or 'anonymous'					E.g., noise, dust, gender-based violence and harassment									
2.															
3.															
4.															
5.															