

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**PROJECT: ENVIRONMENTAL AND SOCIAL DUE DILIGENCE
CGES BIH-MNE-ALB 220KV RECONDUCTORING**

E3 Consulting
FINAL | 31-Oct-25

Contents

1. INTRODUCTION	6
1.1. Project Context.....	6
1.2. Objective and Scope of the Stakeholder Engagement Plan	7
2. PROJECT DESCRIPTION AND LOCATION	7
3. REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT.....	10
3.1. EBRD Environmental and Social Policy	10
3.2. National Legislation for Stakeholder Engagement	11
4. STAKEHOLDER IDENTIFICATION AND ANALYSIS.....	11
4.1. Stakeholder Identification	11
4.2. Gender Considerations and Vulnerable individuals or groups	12
5. PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES	18
6. STAKEHOLDER ENGAGEMENT PROGRAMME	19
6.1. Disclosure of Project Documentation.....	20
6.2. Informing the Public about Construction works	20
6.3. Engagement Objectives and Methods	21
6.4. Means of Engagement and Indicative Budget	25
7. GRIEVANCE MANAGEMENT	27
7.1. Visibility.....	27
7.2. Submission	27
7.3. Grievance recording and acknowledgement	28
7.4. Grievance response and resolution	28
7.5. EBRD's Independent Project Accountability Mechanism	29
8. MONITORING AND REPORTING.....	29
9. APPENDICES	30

List of Tables

Table 1: List of Municipalities with belonging settlements	9
Table 2: Stakeholder list	13
Table 3: Summary of stakeholder meetings	18
Table 4: Summary of stakeholder engagement and disclosure requirements	21
Table 5: Means of engagement and indicative budget.....	25

List of Figures

Figure 1: Layout of OHL route.....	8
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Abbreviations

Abbreviation	Meaning
ACSR	Aluminium Conductor Steel Reinforced
BiH	Bosnia and Herzegovina
CGES	“Crnogorski elektroprenosni sistem” (Montenegrin Transmission System Operator)
CSO	Civil Society Organization(s)
EBRD	European Bank for Reconstruction and Development
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy (of the EBRD)
EU	European Union
HTLS	High-Temperature Low-Sag
ILO	International Labour Organisation
kV	Kilovolt
MW	Mega Watt
NGO	Non-governmental Organization(s)
NTS	Non-Technical Summary
OPGW	Optical Ground Wire
OHL	Overhead line
PAP	Project-affected party
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan

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
Stakeholders	<p>Stakeholders are those:</p> <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	<p>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.</p>
Stakeholder engagement	<p>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.</p>
Stakeholder Engagement Plan (SEP) – <i>this document</i>	<p>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.</p>
Grievance mechanism	<p>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.</p> <p><i>See Chapter 7 for details about the grievance mechanism.</i></p>
Vulnerable people or groups	<p>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.</p>

1. Introduction

This Stakeholder Engagement Plan (SEP) has been prepared for the reconductoring of the 220 kV transmission line connecting Trebinje (Bosnia and Herzegovina), Perućica and Podgorica (Montenegro), and Vau Dejës (Albania). The Project is implemented by Crnogorski Elektroprenosni Sistem (CGES) with the support of the European Bank for Reconstruction and Development (EBRD).

The SEP sets out the approach to engagement with stakeholders throughout the Project lifecycle, ensuring that communication is transparent, inclusive, and consistent with EBRD Environmental and Social Policy (2024), in particular Environmental and Social Requirement 10 on Stakeholder Engagement. The Plan defines how information will be disclosed, how stakeholders can participate in decision-making, and how grievances can be raised and addressed.

Its purpose is to build and maintain constructive relationships with affected communities, authorities, and other interested parties, ensuring that their views are taken into account and that risks and impacts are managed in a responsible manner. The SEP also provides a framework for continuous dialogue, helping to secure social acceptance and to enhance the overall sustainability of the Project.

1.1. Project Context

The Montenegrin Transmission System Operator, Crnogorski Elektroprenosni Sistem AD (CGES), has prepared this Stakeholder Engagement Plan (SEP) for the Environmental and Social Due Diligence of the BIH-MNE-ALB 220 kV Reconductoring Project (the “Project”). The Project involves the rehabilitation and upgrade of a strategic cross-border electricity transmission corridor in Montenegro, forming part of the regional network connecting Bosnia and Herzegovina in the north with Albania in the south. The corridor consists of a 220 kV overhead transmission line extending from Trebinje (Bosnia and Herzegovina), across Montenegro - including the Perućica hydropower plant and the main Podgorica substation - to Vau Dejës (Albania). This interconnection has been in continuous operation for over five decades and requires a comprehensive technical upgrade to maintain reliability and regional security of supply.

The Project will nearly double the corridor’s transmission capacity from approximately 350 MW to 700 MW. The upgrade will be primarily achieved through the replacement of outdated cables and conductors with High Temperature Low Sag (HTLS) conductors, along with installation of new insulators and fittings, refurbishment of towers with anti-corrosion treatment, foundation strengthening, and installation of optical ground wire (OPGW). All works will be carried out within the existing right-of-way of the corridor.

The upgrade will extend the operational lifetime of the line, reduce technical losses, enhance cross-border operational flexibility, facilitate renewable energy integration, and support secure electricity exchange within the Western Balkans. The SEP establishes a framework for transparent, timely, and inclusive engagement with all stakeholders, ensuring that interested and affected parties are informed, consulted, and provided opportunities for feedback throughout planning, construction, and operation.

The environmental and social assessment indicates that potential impacts are limited, temporary, and site-specific, mainly relating to construction activities such as vegetation clearance, increased traffic, temporary land access, and localized noise and dust. No permanent land acquisition or resettlement is required, and targeted mitigation measures have been defined to avoid or minimise potential negative impacts.

The Project is categorised “B” in accordance with the EBRD Environmental and Social Policy (ESP) (2024)¹.

1.2. Objective and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) has been prepared by CGES/PIU to ensure clear and transparent communication with all interested and affected parties regarding the stakeholder engagement program to be implemented throughout the entire Project cycle. The SEP identifies key stakeholders, defines communication methods, and outlines planned activities in relation to the construction of the Project.

The primary objective of the SEP is to support and facilitate informed Project-related decision-making by enabling the active, timely, and meaningful participation of stakeholders. It aims to provide all stakeholders with opportunities to express their views and concerns, which may influence Project outcomes. The SEP is therefore designed to strengthen stakeholder engagement across all phases of the Project and to ensure that such engagement is carried out in compliance with applicable Montenegrin legislation and the requirements of the EBRD's ESP (2024) and Environmental and Social Requirements, and relevant international conventions and protocols relating to environmental and social issues, as transposed into national legislation.

This SEP provides a framework for stakeholder engagement, detailing the scope, timing, and methods of interaction. It ensures that project information—covering the project's purpose, scale, risks, impacts, benefits, and mitigation measures—is communicated in local languages and in a form understandable to affected communities, with special attention to groups that may be disproportionately impacted. The plan facilitates continuous engagement, enabling timely feedback on stakeholder input, informing stakeholders of final project decisions and mitigation measures, and supporting monitoring of the engagement process and grievance mechanism. The SEP is designed to be updated whenever project risks or impacts change significantly, ensuring ongoing effectiveness.

2. Project Description and Location

The existing 220 kV transmission line Trebinje (BiH) - Perućica (ME) - Podgorica (ME) - Vau Dejës (AL) was constructed in the 1970s as an interconnection between Trebinje (BiH), Podgorica (ME), and Vau Dejës (AL) (HPP Mao Ce Dun). Subsequently, the HPP Perućica was connected to the Trebinje (BiH) – Podgorica (ME) section. Currently, the line consists of the following three sections:

- > 220 kV OHL Trebinje (BiH)- Perućica (ME), Section 1, 138 towers
- > 220 kV OHL Perućica (ME)- Podgorica (ME), Section 2, 104 towers
- > 220 kV OHL Podgorica (ME)-Vau Dejës (AL), Section 3, 65 towers

The total length of the line within Montenegrin territory is approximately 95 km, while the total number of towers is 307. After more than 50 years of operation, the line has reached the end of its service life and requires urgent rehabilitation. Overview of the entire route, including the three sections, is shown in the figure below.

¹Available at <https://www.ebrd.com/home/news-and-events/publications/institutional-documents/environmental-and-social-policy-2024.html>

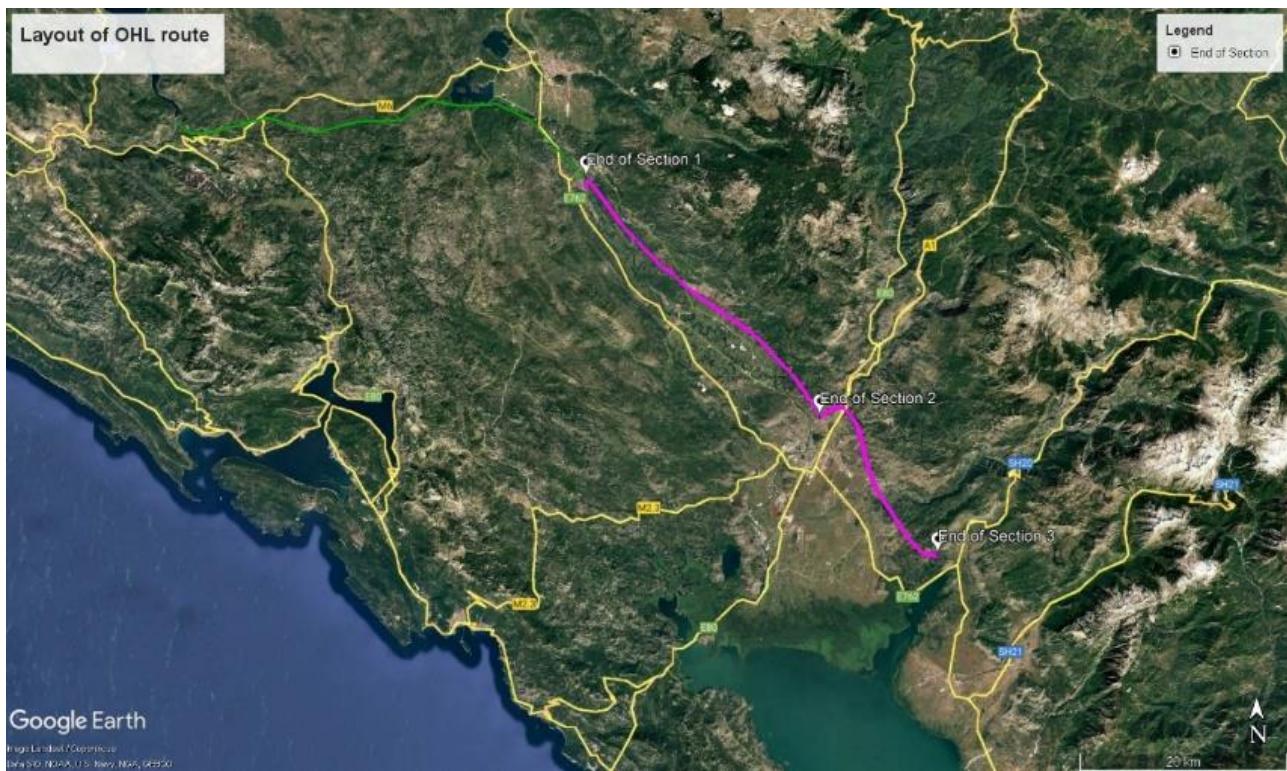


Figure 1: Layout of OHL route

The purpose of this project is to rehabilitate the corridor through targeted technical upgrades that will ensure long-term operational security, enable the integration of new renewable energy sources, and contribute to regional electricity market development.

The scope of works includes:

- > Replacement of existing ACSR 360/57 conductors with HTLS conductors across all three sections of the line;
- > Installation of new insulators and fittings;
- > Replacement of steel ground wire with OPGW where not currently installed;
- > Replacement of damaged or corroded tower members, anti-corrosion protection through tower painting, and local reinforcement of foundations;
- > Strengthening of grounding systems and vegetation clearance along the corridor to improve access and ensure safe operations.

The methodology of implementation starts with a detailed route inspection, verification of tower and foundation conditions, and preparation of access roads and working areas. Conductor drums will be transported, lifted, and positioned on adequate supports, and stringing will be executed with puller and tensioner machines. Conductors will be pulled through blocks attached to insulator strings on the towers, with synchronized pulling and braking to maintain proper tension and ensure ground clearances. Final works will include clamping of conductors, installation of joints, spacers, dampers, and other protective fittings, followed by testing and quality control of all elements. The execution of works will require the use of specialised machinery such as pullers and tensioners, conductor drums with lifting and support devices, cranes, aerial platforms for tower interventions, and transport vehicles. On easily accessible sections, heavy mechanization will be employed, while on remote or steep terrain manual works, climbing equipment, and specialised solutions will be applied.

The total expected duration is **12–18 months**, organised in phases by sections:

- > **Section 1:** Trebinje - Perućica
- > **Section 2:** Perućica - Podgorica
- > **Section 3:** Podgorica - Vau Dejës

This phasing will minimise outages and allow coordination with transmission system operators in Montenegro, BiH and Albania. Construction activities will be scheduled during planned outages with temporary redirection of energy flows to maintain operational stability throughout the process. Detailed work methodology is going to be defined by the Contractor, along with the design, whereby this will be done only after the Contractor is selected.

All activities will comply with international technical standards and occupational safety requirements (EN/IEC), with strict attention to worker safety, equipment protection, and proper grounding. Environmental measures will include controlled handling of waste, prevention of oil or chemical spills, and respect for protective zones along the transmission corridor.

By applying HTLS conductors, the ampacity of the line will nearly double compared to the existing ACSR conductors, which will significantly increase cross-border capacity and improve operational flexibility of the regional transmission system.

The rehabilitation will extend the service life of the corridor by at least 30 years, reduce the risk of outages under both summer and winter operating conditions, and enable the connection of new renewable energy facilities. In addition to technical benefits, the project will strengthen Montenegro's position in regional electricity trade, contribute to the integration of renewable generation, and deliver socio-economic gains through more reliable supply and lower transmission losses.

The Project follows the existing overhead transmission line corridor across central and southern Montenegro, extending from the border with Bosnia and Herzegovina in the north to the border with Albania in the south. The route traverses four municipalities: **Nikšić, Danilovgrad, Podgorica, and Tuzi**. Below is a list of municipalities, including their respective settlements.

Table 1: List of Municipalities with belonging settlements

Municipality	Settlement
Nikšić	Bogetići
	Carine
	Medede
	Muževice
	Okolišta
	Orlina
	Ponikvica
	Rudine
	Spila
	Trubjela
	Vilusi
	Zagora
	Povija
Danilovgrad	Bare Šumanovića
	Boronjina
	Brijestovo

Municipality	Settlement
	Donji Martinići
	Drakovići
	Jelenak
	Mijokusovići
	Potkraj
	Potkula
	Slap
Podgorica	Rogami
	Zlatica
	Smokovac
	Doljani
	Masline
Tuzi	Dinoša
	Spinja
	Tuzi

The project area is characterised by a mix of secluded and unpopulated zones, as well as rural settlements where agricultural activities are predominant. Along its route, the OHL corridor intersects with existing public infrastructure, including local and main roads, the Highway “Princeza Ksenija,” and a railway line. The terrain is also partly covered with vegetation, and limited clearing, including occasional tree cutting, may be required to enable access to tower sites. Additionally, Certain works fall within the boundaries of the Nature Park Rijeka Zeta, predominantly Zone III with a short section in Zone I. Works in these areas will be coordinated with the Public Institution ‘Nature Park Rijeka Zeta’ (Danilovgrad), the Agency for Management of Protected Areas Podgorica (AUZP), and the Environmental Protection Agency (EPA), with mitigation and supervision aligned to permit conditions and biodiversity protection measures.

3. Regulatory Requirements for Stakeholder Engagement

3.1. EBRD Environmental and Social Policy

EBRD has set out a comprehensive set of specific Environmental and Social Requirements (ESR) that projects are expected to meet. ESR 10 (Stakeholder Engagement) of the EBRD Environmental and Social Policy (2024) establishes the requirements for transparent, inclusive, and culturally appropriate engagement with stakeholders throughout the entire project lifecycle. This includes stakeholder identification and analysis, planning of engagement activities, disclosure of timely and accessible information, meaningful two-way consultation, ongoing reporting, and the establishment of an effective grievance mechanism. Engagement must be gender-responsive, inclusive of vulnerable and underrepresented groups, and carried out free from manipulation, coercion, intimidation, or retaliation. EBRD requires that project developers establish and maintain an effective grievance mechanism, ensuring that any stakeholder complaints and concerns are received, handled and resolved effectively, in a prompt and timely manner.

This SEP provides a clear and structured framework to ensure that project information is communicated in a manner understandable to affected communities, with particular attention to those who may be disproportionately impacted. This SEP specifically facilitates continuous engagement, enables timely feedback on stakeholder input, and ensures transparent communication of final project decisions and

mitigation measures. It also supports monitoring of both the engagement process and the grievance mechanism, allowing for adjustments to enhance effectiveness, and is updated whenever project risks or impacts change significantly.

3.2. National Legislation for Stakeholder Engagement

According to the national laws and regulations stakeholder engagement is required in following fields: spatial planning process, land expropriation and environmental impact assessment process. By far, Montenegro has ratified a number of international treaties and conventions along with the ongoing process of transposing EU law into the national legal and policy framework.

The main legal provisions in Montenegro which are relevant to the Project and contain provisions and principles related to public participation and access to information are:

- > The Constitution of Montenegro
- > Law on Free Access to Information

Constitution of Montenegro: The Constitution of Montenegro is proclaiming that cit. ‘Everyone has the right to a healthy environment, and everyone has the right for timely and complete information of the state of the environment as well as the possibility to influence decision making process when deciding on issues of importance to the environment and on the legal protection of these rights.’-

Law on Free Access to Information: According to the Article 17 endangering the environment is among 7 prevailing public interests that might be subject of the free access to information where public authorities are obliged to enable access to the information or its part in case if there is prevailing public need for its revealing.

Additionally, Montenegro has ratified a comprehensive set of international conventions that establish the foundation for social safeguards and human rights. These include the Aarhus Convention on access to information and participation in decision-making, all eight ILO fundamental conventions on labour rights, the UN Convention on the Rights of Persons with Disabilities, the European Convention on Human Rights, and the core UN human rights treaties. Through these instruments, Montenegro has committed to protecting workers’ rights, preventing discrimination, ensuring equal participation, safeguarding vulnerable groups, and promoting transparency and accountability.

CGES /PIU will provide ongoing information to identified stakeholders, commensurate to the nature of the Project activities and its associated environmental and social impacts.

4. Stakeholder Identification and Analysis

Key stakeholders who are to be informed and consulted about the Project are:

- A) Affected or likely to be affected by the project (**Project-affected parties**); and
- B) May have an interest in the project (**Other interested parties**).

4.1. Stakeholder Identification

Stakeholders have been identified based on their proximity to project activities, potential exposure to temporary disruptions, and the nature of their interactions with project infrastructure.

Particular attention is given to those who may experience direct or heightened impacts, including residential and business premises in the vicinity of towers (with emphasis on tension/suspension

towers), agricultural land occupied by towers, cultural or religious heritage sites nearby, and locations where the OHL route crosses public infrastructure (main and local roads, highways, and railways). This focus includes residents with houses or backyards adjacent to tension towers and property owners whose land or access routes may be temporarily affected during construction, as well as vulnerable individuals, local businesses, municipal authorities, infrastructure operators and other stakeholders who may require tailored communication and engagement approaches.

4.2. Gender Considerations and Vulnerable individuals or groups

Gender considerations have been integrated into the SEP and the planned engagement methods. The SEP includes a variety of mechanisms to enable women to participate in consultations and provide feedback on different aspects of the Project. Women's perspectives will be actively sought throughout Project activities.

While the project-affected area does not generally include vulnerable or disadvantaged groups requiring special communication channels, one particularly vulnerable individual was identified during the site visit. This person is elderly, lives alone, has multiple health conditions, and is of limited financial means, highlighting the need for tailored engagement and support. In response, CGES/PIU has committed to providing immediate assistance. The CGES/PIU legal department has prepared an official declaration of support, and the assistance will be provided in the upcoming period.

If CGES/PIU, during project implementation, identifies some other vulnerable groups or individuals affected by this project, it will be added to this SEP and appropriate communication methods will be identified and engagement activities will be conducted with this vulnerable group/s.

The following table provides a detailed overview of identified stakeholders, their specific interests or concerns, engagement objectives, and the communication methods that will be applied to ensure timely and effective information sharing. The list below may not be final. Any stakeholders not identified at this stage of the Project are encouraged to contact the CGES/PIU directly to communicate their interests and needs. The CGES/PIU will update the SEP accordingly. Suggestions for improving the proposed communication methods are also welcome and can be submitted to the CGES/PIU, which remains open to stakeholder feedback. Also, CGES will periodically update this list, as well as the SEP itself, throughout the entire duration of the Project.

Table 2: Stakeholder list

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
Project-affected parties			
Municipalities Niksic, Danilovgrad, Podgorica and Tuzi , together with their surrounding settlements (please see Table 1) Stakeholders in these areas are: <ul style="list-style-type: none"> • residents • public utility companies, • businesses 	<p>Temporary disruptions to the electricity supply. The disconnections will take place over several consecutive days within the area of a single work field, during the period from 07:00 to 17:00 (daylight hours, depending on the time of year and weather conditions), along the sections between the working machines (within the work fields – between the puller and tensioner machines). The locations that are going to be subject to interruptions in power supply are only going to be known once the full project implementation plan is developed.</p> <p>Short-term road interruptions during construction activities which may disrupt the established routines of residents and the operations of businesses, including the transport of workforce and materials.</p>	<p>Provide advance notice to affected residents and businesses, coordinate with local authorities, and schedule works to minimize disruption to electricity supply, essential services, and alternative transportation routes.</p> <p>Ensure stakeholders understand the timing, duration, and reason for the temporary power and road outages and can prepare accordingly.</p>	<p>Disclosing information on the scope, schedule, and duration of planned works, as well as any anticipated disruptions or inconveniences through:</p> <ul style="list-style-type: none"> • Public information channels, including national and local television and radio stations • Online social media, Official municipal websites of all four affected municipalities, • Notices on the bulletin boards of all four municipalities and their local communities, as well as at the most frequently visited locations within the affected local communities, such as schools, shops, and health centres.
Park Authority and Emerald Site Authority <i>Public Institution “Nature Park Rijeka Zeta”</i> (Danilovgrad Municipality) Agency for Management of Protected Areas Podgorica (AUZP) Environmental Protection Agency of Montenegro (EPA)	<p>Works will be implemented within the boundaries of the Nature Park Zeta River (mainly Zone III, with a short section in Zone I). These authorities are responsible for managing and protecting the park, ensuring compliance with conservation and biodiversity regulations.</p>	<p>Ensure early coordination with park authorities to avoid or minimize impacts within protected zones; provide information on timing, scope, and mitigation measures; ensure proper supervision and monitoring in accordance with ESAAR and ESAP commitments.</p>	<ul style="list-style-type: none"> • Formal consultation and coordination before commencement of works in Zones I and II. • Notification on construction schedule, access routes, and mitigation measures. • Joint field inspections at sensitive locations (as required). • Exchange of biodiversity and bird monitoring reports. • Annual coordination meeting - CGES, Park Authority, AUZP, EPA (as required). • Communication via e-mail, official letters, and, as needed, online or in-person meetings.

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
Affected landowners, residents, and businesses (property owners and users) in the project area Individuals living or operating within the project footprint whose property (such as houses, backyards, vineyards, etc.) may be affected during project activities. Whose paths of movement will be affected during the construction or of the transmission line	Temporary occupation of private property, including residential and auxiliary objects may occur during project implementation potentially resulting in restricted access, limited use of land, and potential damage to vineyards immediately surrounding the towers, as well as other short-term impacts and temporary effects on facilities at tension tower sites during conductor replacement works.	Provide timely information to affected landowners, residents, and businesses, agree on access and reinstatement measures, and minimise disruptions during temporary occupation of private property.	Public and individual consultation meetings, if possible. Public announcements shall be placed in visible public locations along the alignment of all three OHL sections, with particular attention to the vicinity of towers, especially tension towers located within local communities, at frequently visited places such as local self-government offices, stores, schools, and markets Telephone calls, or written notifications through direct email communication. Online social media (such as Facebook, YouTube, Instagram etc.), official municipal website, Viber & WhatsApp, other.
Local residents and passengers using road and rail transport Whose paths of movement will be affected during the construction of the transmission line	Temporary interruptions to road and rail traffic on sections affected by project activities	Provide timely information to local residents and passengers about temporary interruptions to road and rail traffic, explain alternative routes or schedules where possible, and ensure that stakeholders are aware of the timing and duration of construction activities to minimise disruption.	Information on the extent, timing, and duration of expected temporary interruptions to road and rail traffic will be disclosed through the placement of information boards on affected roads and railway stations, announcements via local media such as radio and television, and updates on the project website and social media.
Transport and infrastructure operators: Railway Transport of Montenegro (Željeznički prevoz Crne Gore ŽPCG)	As the national railway and railway freight operators, Railway Transport of Montenegro's and Montecargo's operations and scheduling may be temporarily disrupted due to construction activities	Ensure Railway Transport of Montenegro is fully informed of project activities affecting railway operations	Regular coordination meetings with ŽPCG, ŽICG and Montecargo management, advance notifications of planned works affecting railway operations, written

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<ul style="list-style-type: none"> • Railway infrastructure of Montenegro (Željeznička infrastruktura Crne Gore ŽICG) • Montecargo • Monteput 	<p>ŽICG's assets, tracks, signalling, and electrical systems may be temporarily affected by construction activities.</p> <p>Works on the section of the OHL crossing the "Princeza Ksenija" Highway may lead to delays in execution, safety incidents during the overhead line crossing, or temporary traffic suspensions</p>		<p>updates via email, and direct phone contact for urgent issues or emergencies.</p> <p>CGES to maintain regular communication with Railway infrastructure of Montenegro and its pertaining entities, municipalities in the project area for the purpose of duly planning.</p> <p>Engagement with Monteput to be conducted to ensure proper coordination where the overhead line (OHL) crosses the "Princeza Ksenija" Highway</p>
Vulnerable groups/individuals	Project activities may disproportionately affect elderly, disabled, or low-income households	Ensure that vulnerable groups or individuals are adequately informed and supported, and provide individual assistance wherever possible	Direct contact via community representatives or social services, accessible public meetings
Other interested parties			
Relevant government authorities, ministries, and public institutions, including: <ul style="list-style-type: none"> • Ministry of Energy and Mining (MEM) • Ministry of Ecology, Sustainable Development and Northern Region Development • Ministry of Agriculture, Forestry and Water Management • Ministry of Labour and Social Welfare 	Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation	<p>Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures</p> <p>Reporting based on national legislation requirements</p>	<p>Formal consultation meetings.</p> <p>Direct email communication</p>
Infrastructure and Utility Operators: CEDIS-Montenegrin Electricity Distribution System	Coordination of works to avoid disruption of electricity distribution and road infrastructure; ensuring compliance with technical and safety standards; minimising risks of service interruptions during construction.	Maintain timely and accurate exchange of technical information with utility operators to minimise	Regular coordination meetings, written correspondence (letters, emails), direct phone contact for urgent issues.

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
		interruption of essential services.	Engagement with CEDIS to be conducted in accordance with mandatory internal procedures, including "Procedure for "Planning Outages Pursuant to Article 54 of the Statute", No. 316 of 15 th January 2020) and "Procedure for Submitting and Approving Requests for the Outage of Power Transmission System Elements", No. 316/1 January 2020).
Interested non-governmental organizations (NGOs) Environmental NGOs (including birdlife NGOs), Social Welfare NGOs, Other NGOs <p>All organizations that have not yet demonstrated a specific interest in this Project, shall be provided with opportunities to voice their opinions or concerns throughout Project preparation and implementation.</p> <p>Note: Any organisations interested in the Project can send their contact details to the CGES/PIU to be included in the notified directly about Project events.</p>	Stakeholders of high significance for the Project's success which are interested in protection of the environment and human health	Providing timely information, communication and consultations	Online individual consultation meetings as necessary. Public consultation meetings, if possible. Direct email communication Media/press releases Online social media (Facebook, YouTube, Instagram), Official website, Viber & WhatsApp, other.
Contractors or subcontractors during construction, monitoring and supervision of works, and their employees.	Compliance with project requirements, occupational health and safety, working conditions, labour rights, environmental protection standards, and clear communication of responsibilities during construction and maintenance.	Ensure that contractors and their employees are fully informed of project requirements, code of conduct, health and safety procedures, and	Information through tender procedure and contracts. Communication via supervising engineers. Toolbox talks at construction sites on health and safety topics.

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
		environmental and social standards, and that they comply with these throughout project implementation.	Monthly reports on progress of works to be submitted by contractors during construction works. Trainings. Email communication.

5. Previous Stakeholder Engagement Activities

Prior to the preparation of this SEP, a series of stakeholder consultations was conducted by CGES/PIU to inform relevant parties about the project and gather their feedback.

The consultations covered the representatives of municipalities directly affected by the project, as well as key infrastructure operators. The purpose of these meetings was to provide stakeholders with an overview of the project, discuss potential impacts, and identify concerns and suggestions that could inform the planning and implementation of mitigation measures.

Separate coordination meetings with Nature Park Rijeka Zeta, AUZP and EPA are planned prior to works in protected zones to align access routes, timing of works, and any other environmental protection conditions and requirements which may be required by these institutions in accordance with the Detailed Design and the national EIA procedure.

Table 3: Summary of stakeholder meetings

Date /Venue	Stakeholder	Key issues discussed	Method
11 th Sep 2025 Municipality Danilovgrad	Municipality of Danilovgrad	Municipal road work plans, procedures for temporary road closures and diversions, sensitive locations such as schools and health centres, emergency response contacts, and biodiversity and environmental planning data. Additionally, the meeting included discussion about communication in the project planning phase, as well as the local departments which shall be included in Project implementation in relation to the potential emergency situations.	Communication with physical presence
15 th Sep 2025 Capital City of Podgorica, Secretariat for Spatial Planning and Sustainable Development	Capital City Podgorica	The City's plans for road works within the project area, procedures for temporary road closures, and emergency situations managed by the Protection and Rescue Service. Methods for informing citizens via the website and Viber group were reviewed, as well as field inspections of the transmission line route with attention to protected natural areas and potential impacts on biodiversity. Available data and environmental protection documentation, including the LEAP and the Biodiversity Action Plan, which will be provided to the consultant.	Communication with physical presence
15 th Sep 2025 Municipality Tuzi	Municipality of Tuzi	Ongoing road works, procedures for temporary closures and emergency response, sensitive locations such as schools and farms, available biodiversity data and protected areas, and the 2024–	Communication with physical presence

Date /Venue	Stakeholder	Key issues discussed	Method
		2027 Local Environmental Action Plan (LEAP).	
17 th Sep 2025 Railway Transport of Montenegro	• Railway Infrastructure of Montenegro • Railway Transport of Montenegro • Montecargo	Coordination related to railway crossings near towers 67 and 205, covering notification requirements, planning for passenger and freight services, as well as procedures for temporary traffic interruptions and emergency communication.	Communication with physical presence
19 th Sep 2025	Niksic Municipality	Coordination in relation to implementation of the planned Project in relation to municipal projects related to development and upgrade of public infrastructure in the project area. Additionally, the meeting included discussion about communication in the project planning phase, as well as the local departments which shall be included in Project implementation in relation to the potential emergency situations.	Communication with physical presence
29 th Sep 2025	Monteput	Meeting with MONTEPUT was related to Project implementation planning since two tension towers cross over the toll booth in Smokovac. Additionally, the meeting was aimed at discussing MONTEPUT's plans for development of a new road section Smokovac-Tolosi, which runs close to the project area. The outcome of the meeting was an agreement about cooperation during project planning and implementation, so as to ensure that both parties have exchanged their technical documentation, aligned all the pertaining elements, whereby MONTEPUT is going to ensure that their Highway maintenance department is at disposal to CGES during project implementation, so as to ensure road and traffic safety. CGES emphasised that they are not planning to interrupt highway traffic, nevertheless, Director of MONTEPUT stated that this can be done, if deemed possible during project implementation.	Communication with physical presence

6. Stakeholder Engagement Programme

For the Project purposes, CGES/PIU will use various stakeholder engagement methods to maintain continuous communication with all interested parties and ensure that relevant information is accessible to the public. In cooperation with the affected municipalities and local communities, CGES/PIU will keep residents and businesses within or near the Project footprint regularly informed about Project

developments, particularly regarding the start of construction activities and their potential impacts on the local population and businesses.

6.1. Disclosure of Project Documentation

The CGES/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 national Environmental Impact Assessment, if deemed necessary to prepare (decision of the Environmental Protection Agency)

The documents will be made publicly available in both Montenegrin and English, in electronic and printed form, on the CGES/PIU website and at its office (Bulevar Svetog Petra Cetinjskog 18, Podgorica, Montenegro). The CGES/PIU will also ensure that all four included municipalities publish links to these documents on their official websites.

Following disclosure, stakeholders will have one month to provide their comments, opinions, and suggestions regarding the Project. To encourage participation, the CGES/PIU will, at the same time as disclosure, publish a notification on the CGES/PIU website—and ensure the same is done on the websites of all four municipalities -indicating the CGES/PIU's contact details and the deadline for submitting feedback. CGES/PIU contact details are provided in Chapter 7 of this SEP. All comments and proposals will be considered by the CGES/PIU. A brief report ("comments matrix") on comments/proposals received and responses from the CGES/PIU will be published on their website following the public review period.

6.2. Informing the Public about Construction works

The CGES/PIU will ensure the timely provision of clear and transparent information regarding the planned construction activities. For this purpose, a public notice outlining the commencement date and anticipated duration of the works, accompanied by the Public Grievance Leaflet and the Project Grievance Form, will be disclosed no later than 30 days prior to the initiation of construction through the following channels:

- > on the official websites of CGES/PIU and the concerned municipalities;
- > through the display of notices on the bulletin boards of all four municipalities and their local community offices, as well as at key public locations within the affected local communities, including schools, shops, and health centres;
- > through publication in both local and national media

6.3. Engagement Objectives and Methods

The table below sets out the identified stakeholders together with their respective communication requirements.

Table 4: Summary of stakeholder engagement and disclosure requirements

No.	Target stakeholder group	Engagement activity	Stakeholder engagement method	Responsibility	Timing
1.	Municipalities Niksic, Danilovgrad, Podgorica and Tuzi, together with their surrounding settlements (please see Table 1) Stakeholders in these areas are: <ul style="list-style-type: none">• residents• public utility companies,• businesses	Organise at least one public consultation meeting with the public and non-institutional stakeholders before the commencement of project activities.	Stakeholders will be informed about the date, time, and location of each meeting at least seven days in advance, preferably 14 days in advance, through announcements on the CGES website, local media, and notice boards in the relevant municipalities and nearby communities.	CGES/PIU	At least seven days before planned consultation/meeting
	Affected landowners, residents, and businesses (property owners and users) in the project area	Encourage written proposals and comments. Providing timely access to the documents before any meeting	Organise targeted outreach to women in affected communities (through local women's associations, health centres, schools, or community leaders). When needed, hold separate focus group discussions with women to encourage open dialogue on health, safety, and environmental concerns		
	Interested non-governmental organizations (NGOs)	Ensure women's participation in consultations and decision-making.			
2.	Affected landowners, residents, and businesses (property owners and users) in the project area	Organise individual consultation meetings, as needed or requested by the CGES, municipality or by any identified stakeholder groups/individuals	As needed or requested by the CGES, municipality, or by any identified stakeholder groups/individuals	CGES/PIU	Upon request
3.	Local residents and passengers using road and rail transport	Provide timely information to local residents and passengers about temporary	Public and individual consultation meetings, if possible.	CGES/PIU	Before the commencement of works

No.	Target stakeholder group	Engagement activity	Stakeholder engagement method	Responsibility	Timing
		interruptions to road and rail traffic, explain alternative routes or schedules where possible, and ensure that stakeholders are aware of the timing and duration of construction activities to minimise disruption	Public announcements shall be placed in visible public locations along the alignment of all three OHL sections, with particular attention to the vicinity of towers, especially tension towers located within local communities, at frequently visited places such as local self-government offices, stores, schools, and markets Telephone calls, or written notifications through direct email communication.		
4.	Vulnerable groups/individuals	Adequately informing and supporting vulnerable groups or individuals and providing individual assistance wherever possible	Direct contact via community representatives or social services, accessible public meetings	CGES/PIU	Continuously throughout the entire duration of the Project
5.	Municipalities Niksic, Danilovgrad, Podgorica and Tuzi Transport and infrastructure operators: Railway Transport of Montenegro (Željeznički prevoz Crne Gore ŽPCG) Monteput	Follow-up pre-construction meeting	Regular coordination meetings with ŽPCG, ŽICG and Montecargo management, advance notifications of planned works affecting railway operations, written updates via email, and direct phone contact for urgent issues or emergencies. Regular communication with the Railway infrastructure of Montenegro and its pertaining entities, municipalities in the project area, for the purpose of duly planning.	CGES/PIU	Before commencement of works

No.	Target stakeholder group	Engagement activity	Stakeholder engagement method	Responsibility	Timing
			Timely Engagement with Monteput to ensure proper coordination where the overhead line (OHL) crosses the “Princeza Ksenija” Highway		
6.	Relevant government authorities, ministries and public institutions, including: <ul style="list-style-type: none"> • Ministry of Energy and Mining (MEM) • Ministry of Ecology, Sustainable Development, and Northern Region Development • Ministry of Agriculture, Forestry and Water Management • Ministry of Labour and Social Welfare 	Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures Reporting based on national legislation requirements	Formal consultation meetings. Direct email communication	CGES/PIU	To be decided by CGES
7.	Nature Park / AUZP / EPA	Where activities occur within protected areas, public notices will also be shared with the Nature Park Rijeka Zeta information channels (as applicable), and coordination notices will be sent to AUZP and EPA in line with permit/consent conditions. Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures	Formal consultation meetings. Direct email communication	CGES/PIU	After finalisation of the Main Design

No.	Target stakeholder group	Engagement activity	Stakeholder engagement method	Responsibility	Timing
		Reporting based on national legislation requirements			
8	CEDIS-Montenegrin Electricity Distribution System	Maintain a timely and accurate exchange of technical information with utility operators to minimize interruptions to essential services.	Regular coordination meetings, written correspondence (letters, emails), and direct phone contact for urgent issues. Engagement with CEDIS to be conducted in accordance with mandatory internal CGES procedures.	CGES/PIU	To be decided by CGES
9.	Contractors or subcontractors during the construction, monitoring, and supervision of works, and their employees.	Ensuring that contractors and their employees are fully informed about project requirements, code of conduct, health and safety procedures, and environmental and social standards, and that they comply with these throughout project implementation.	Information through tender procedure and contracts. Communication via supervising engineers. Toolbox talks at construction sites on health and safety topics. Monthly reports on the progress of works to be submitted by contractors during construction works. Trainings. Email communication.	CGES/PIU	Before the commencement of works
10.	All stakeholders	Announce planned interruptions of electricity supply to the public, specifying affected locations and expected duration, covering roads, railway lines, and electricity supply. Informing on the project announcement, scope,	Providing notice through: <ul style="list-style-type: none"> • Public information channels, including national and local television and radio stations • Online social media, Official municipal websites of all four affected municipalities, • Notices on the bulletin boards of all four municipalities and 	CGES/PIU	72 hours in advance of the planned power outage and continuously throughout the entire duration of the Project

No.	Target stakeholder group	Engagement activity	Stakeholder engagement method	Responsibility	Timing
		chedule, and duration of planned construction works, as well as any anticipated disruptions or inconveniences	their local communities, as well as at the most frequently visited locations within the affected local communities, such as schools, shops, and health centres.		

6.4. Means of Engagement and Indicative Budget

The table below provides an overview of indicative budget for implementation of the planned stakeholder engagement activities, per means of engagement.

Table 5: Means of engagement and indicative budget

No.	Means of Engagement	Description / Scope	Frequency / Timing	Indicative Budget (EUR)	Price Basis / Explanation
1	Public information & media (general + outages)	Regular updates on project activities, planned outages and safety measures on CGES and municipal websites, through online media, radio, and print. CEDIS will publish outage notices in print media (~70 € per notice).	Ongoing throughout project implementation, including periods of the necessary interruptions in power supply	5.200	Estimated based on a typical combination of regular online/radio/social media updates (~350 €/month for 12-18 months) and occasional print notices coordinated with CEDIS (~700 € total). Prices based on 2025 national media and digital advertising rates.
2	Printed & visual information materials	Posters, leaflets, and information boards (ME/EN) displayed in municipalities and Local Community Offices (MNE: "mjesne zajednice"). Updated with each SEP revision.	3 updates (approx. twice/year)	1.950	650 € × 3 updates = 1.950 € (design, bilingual print, distribution).
3	Project disclosure package (online + hard copies)	Public disclosure of: this SEP, the Public Grievance Leaflet, the Project Grievance Form, the Non-Technical Summary (NTS), and the national EIA (if	Continuous; refreshed twice/year	1.800	Covers preparation, formatting, printing (5 complete sets) and online

No.	Means of Engagement	Description / Scope	Frequency / Timing	Indicative Budget (EUR)	Price Basis / Explanation
		required by EPA). Documents available on the CGES website, four municipal websites, and in hard copy at CGES headquarters and municipal offices.			upload. Based on local printing and handling costs (2025).
4	Flyers / brochures	Short bilingual leaflets summarising project scope, schedule, safety information and grievance contacts, printed in full colour and distributed locally.	2 editions (start & mid-term)	2.400	1,200 € × 2 editions: includes design, translation, full-colour printing (~1,000 copies), and delivery. Based on 2025 local printing rates.
5	Outreach to vulnerable groups	Distribution of simplified materials and direct communication (via social services, local offices).	Targeted, before & during construction	1.000	Minimal cost - printing of simplified materials + fuel for PIU visits.
6	Public consultations (municipal level)	Public meetings in Nikšić, Danilovgrad, Podgorica and Tuzi before works; ensuring gender-inclusive participation.	4 initial consultations + follow-ups if required	0	Venues and logistics provided free by municipalities.
7	Institutional coordination meetings	Coordination with ministries, municipalities, Nature Park "Rijeka Zeta", AUZP, EPA, CEDIS, railway and transport directorates.	As required	0	Conducted under official cooperation - no direct project cost.
8	Grievance mechanism	Multi-channel system (phone / email / web / in-person) managed by PIU; log maintained and reported quarterly.	Continuous	0	Operated internally by PIU; no external cost.
9	Contingency (10 %)	Reserve for unplanned communication or additional printing.	As needed	1.100	≈10 % of variable items (1–5).
	Total Estimated Budget			≈ 13.000 EUR	

7. Grievance Management

CGES/PIU is committed to minimising and mitigating any potential adverse impacts of the Project on residents, property owners, local businesses, road and rail users, and other potentially affected stakeholders. The CGES/PIU recognises that grievance management is a vital component of stakeholder engagement. A Project-level grievance mechanism has been established to receive, assess, and address grievances. The CGES/PIU will implement this mechanism to ensure it responds promptly and effectively to concerns and complaints. The process will be conducted in a transparent manner, free from manipulation, interference, coercion, discrimination, intimidation, or retaliation, and will be accessible to all affected parties at no cost.

This chapter is supported by the following appendices:

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

The following sections of this chapter elaborate the Project grievance procedure and steps.

7.1. Visibility

The visibility of the grievance mechanism will be ensured through the following measures:

- > **During the early stages of Project development**, the Public Grievance Leaflet and Project Grievance Form will be disclosed on the official websites of the CGES/PIU and the affected municipalities.
- > **Before the commencement of works**: CGES/PIU will publish on its official website a notice with details on the start and duration of the works, together with the Public Grievance Leaflet and the Project Grievance Form. Furthermore, CGES/PIU will ensure that the same notice, along with the mentioned Leaflet, is also published on the official websites of the affected municipalities, as well as on all clearly visible bulletin boards and other prominent locations in the affected settlements.
- > **Once construction activities begin**: CGES/PIU will ensure that the Contractor installs information boards at the entrances to construction sites, clearly displaying the contact details for submitting grievances.

7.2. Submission

Any concerns can be submitted to the CGES/PIU verbally (in person or by telephone) or in writing, by completing the Project Grievance Form and delivering it in person, by post, or by e-mail to the contact details provided below. Grievances may also be submitted anonymously or without using the form, if preferred.

Once the works have commenced, the Project Grievance Form may also be submitted directly to the contractor or the supervision engineer. All grievances received in this way will be forwarded to the CGES/PIU within 24 hours to enable proper processing, including recording, acknowledgement, and response within the timeframes defined below.

7.3. Grievance recording and acknowledgement

CGES/PIU will record all grievances in the Grievance Registry. Written and non-anonymous grievances will be acknowledged within five calendar days. To ensure proper monitoring and evaluation, each grievance will be registered with the following information:

- > Description of the grievance, including its type, to allow timely identification of recurring issues, detection of trends, and management of risks (e.g. grievances related to gender-based violence and harassment, or grievances related to construction nuisances such as waste management, noise, or dust).
- > Complainant profile details, to understand who is most affected and in which locations (this information will remain confidential and accessible only to CGES/PIU staff handling grievances).
- > Dates of grievance receipt and acknowledgement to the complainant.
- > Description of actions taken, including investigation, corrective measures, and preventive measures.
- > Date of resolution and closure, along with feedback provided to the complainant.

In cases where a grievance is submitted in a vague or unclear manner, the CGES/PIU shall provide support to the complainant in order to formulate or redraft the submission so as to ensure adequate clarity and precision. This will allow the CGES/PIU to reach an informed determination, with due regard to the best interests of the affected party as well as the complainant's preferred course of resolution.

7.4. Grievance response and resolution

Upon acknowledging a grievance, the CGES/PIU will make all reasonable efforts to address the complaint. If the issue cannot be resolved through immediate corrective action, a relevant long-term corrective action may be identified. The complainant will be informed of the proposed immediate or long-term action within 10 calendar days of grievance acknowledgement. The CGES/PIU will make reasonable efforts to follow up with the complainant to verify the successful implementation of actions taken.

If the CGES/PIU is unable to address a grievance or determines that no action is required, a detailed explanation will be provided, including, if relevant, guidance on how the complainant may further pursue the grievance if they are not satisfied with the outcome.

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

CGES/PIU contact information is:

CRNOGORSKI ELEKTROPRENOSNI SISTEM AD - Project Implementation Unit

Contact person: Rade Marković

Position: Head of Legal Department/Grievance Manager

Email: rade.markovic@cges.me / office@cges.me

Tel: +382 67 636 727 (mobile) / +382 20 407-682 / +382 20 407-604

Address: Bulevar Svetog Petra Cetinjskog 18, 81000 Podgorica

Website: www.cges.me

7.5. EBRD's Independent Project Accountability Mechanism

All projects financed by EBRD shall be structured to meet the requirements of the [EBRD Environmental and Social Policy](#) (2024) which includes ten Environmental and Social Requirements (ESRs) for key areas of environmental and social sustainability that projects are required to meet, including ESR10 Stakeholder Engagement. In addition, [EBRD's Independent Project Accountability Mechanism](#) (IPAM), as an independent last resort tool, 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.

8. Monitoring and Reporting

The outcomes of the stakeholder engagement process will be documented in Environmental and Social Reports submitted to the EBRD. These reports, to be prepared by the CGES/ PIU, will provide a summary of environmental and social impacts, health and safety performance, disclosure and consultation activities, as well as the implementation of the external grievance mechanism.

In particular, the reports will include:

- **Grievances:** Number and type of grievances received during the reporting period, disaggregated by topic, to enable early identification of recurrent issues, monitoring of trends, and effective risk management. This will cover, *inter alia*, grievances related to gender-based violence and harassment, and those concerning construction phase of the Project) related nuisances such as inadequate waste management, noise, or dust.
- **Engagement activities:** Number and type of disclosure and engagement activities undertaken through all communication channels, with a summary of issues and concerns raised, and an explanation of how these have been addressed by the CGES/PIU. Reporting regarding project-related stakeholder engagement is going to be done in a systematic manner, as CGES is going to keep record of all stakeholder engagement activities throughout all project phases. Template which is going to be used for recording and reporting on stakeholder engagement activities is provided in [Annex 4: Record of Stakeholder Engagement Activities](#).

CGES/PIU will be responsible for monitoring all stakeholder engagement activities associated with the Project, ensuring the effective implementation and regular updating of this SEP, and reporting accordingly to the EBRD.

9. Appendices

Appendix 1: Text for Public Grievance Leaflet

The CGES/PIU is committed to ensuring that the establishment and implementation of the CGES BIH-MNE-ALB 220kv OHL reconductoring does not cause adverse impacts on residents, landowners, business owners or other stakeholders affected by the Project. However, should any issues arise, we encourage you to share any concerns or grievances related to Project activities.

What type of grievance can be submitted?

Any individual may submit a grievance if they believe that Project activities are having a negative impact on them personally, their property or on their local environment. Examples include, but are not limited to:

- Increased noise, restricted access to private property, or other disturbances during construction works;
- Environmental, health, or safety concerns resulting from improper waste management, dust, or noise caused by the Project activities
- Damages on private property caused by the Project activities
- Inadequate implementation of the Stakeholder Engagement Plan by the CGES/PIU.

How can a grievance be submitted?

Grievances can be submitted to the CGES/PIU (contact information provided below) or to the contractor/supervision engineer (once construction commences). Submission is free of charge to the complainant and may be made in the following ways:

- a. Verbally: in person or by telephone;
- b. In writing: either by completing the attached Project Grievance Form or using another preferred format, and submitting it by personal delivery, post, or e-mail.

CONTACT INFORMATION: CRNOGORSKI ELEKTROPRENOSNI SISTEM AD - Project Implementation Unit

Contact person: Rade Marković

Position: Head of Legal Department/Grievance Manager

Email: rade.markovic@cges.me / office@cges.me

Tel: +382 67 636 727 (mobile) / +382 20 407-682 / +382 20 407-604

Address: Bulevar Svetog Petra Cetinjskog 18, 81000 Podgorica

Website: www.cges.me

Grievances may also be submitted anonymously. If you prefer your grievance to remain confidential, the CGES/PIU will ensure that your name and contact details are not shared without your consent. Only members of the CGES/PIU team directly involved in addressing your grievance will have access to this information. In cases where a full investigation is not possible without disclosing your identity or the content of your grievance, you will be notified in advance.

How the CGES/ PIU handles your grievance

Acknowledgment

- If you provide your name, we will contact you within 5 days to confirm we received your grievance.
- You will get a reference number and the contact details of the CGES/PIU staff handling your case.
- If your grievance is unclear, we will help you clarify or rewrite it.

Investigation

- We will make every effort to resolve your grievance.
- We may contact you for more information during this stage.

Response

- Within 10 days of acknowledgment, we will inform you of the results.
- If your grievance is valid, we will explain the actions taken or planned to fix the issue.
- If your grievance is not related to the Project or no standards were breached, we will explain why in writing.

Follow-up

- We may contact you later to ensure the issue has been resolved and no further problems remain.

Appendix 2: Project Grievance Form

Reference Number	
Full name (optional)	<ul style="list-style-type: none"> • I wish to raise my grievance anonymously. • I request that you do not disclose my identity without my consent.
Contact information	<p>By Post: Please provide mailing address:</p> <hr/> <p>By Telephone: _____</p> <p>By E-mail: _____</p>
Preferred language of communication	<ul style="list-style-type: none"> - Montenegrin - English (if possible) - Other (e.g. Serbian, Albanian)
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	<ul style="list-style-type: none"> • One-time incident/grievance (date _____) • Happened more than once (how many times? _____) • On-going (currently experiencing problem)
What would you like to see happen?	

Appendix 3: Grievance Registry – Template

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

	Name of complainant	Complainant profile	Contact information	Date received	Date acknowledged	Type (topic) of problem	Responsible party	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, damages									
2.															
3.															
4.															
5.															

Appendix 4: Record of Stakeholder Engagement Activities

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

No.	Name/type of stakeholder ((e.g., individual, local community, NGO, business, public institution, land or property owner, other (specify)))	Contact information	Date of consultation	Type and place of consultation (e.g., live, online, telephone, group, personal, etc.)	Concern /topic description	Name, surname, and position of the CGES/PIU representative	Name, surname, and position of the Municipality/Local Community representative (if applicable)	Proposed Action / Response (Immediate / Long-term)	Start and end time of the consultation or meeting duration	Are further meetings planned, and if so, within what time frame?	Follow-up	Notes
1.												
2.												
3.												
4.												
5.												