



Montenegro
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Affairs

Ministry of Transport and Maritime Affairs

Transport Directorate

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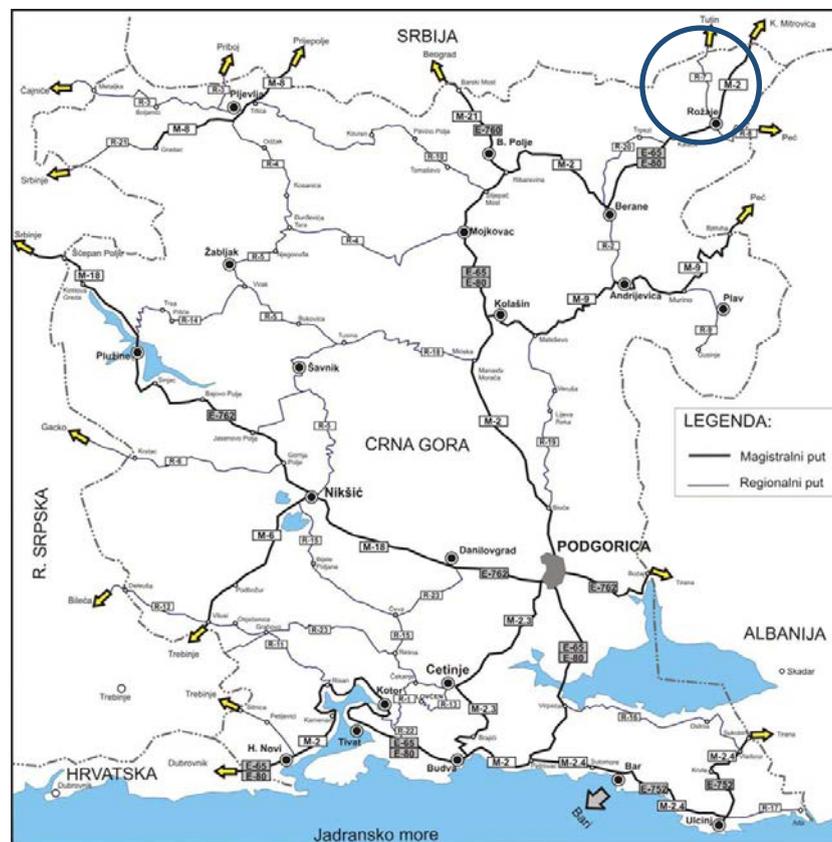
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STAKEHOLDER ENGAGEMENT PLAN

Road Section [Rožaje – Špiljani] part of Main Roads Reconstruction Project in Montenegro



October 2017

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1. INTRODUCTION

The Montenegro Ministry of Transport and Maritime Affairs of Montenegro (MoTMA), through its Montenegro Transport Directorate (MTD) intends to implement the reconstruction of the section of the Ibar highway M-2 between Rožaje and Špiljani (the Project).

The European Bank for Reconstruction and Development (EBRD) is considering providing finance of a sovereign-guaranteed loan in the amount EUR 10 million to the government of Montenegro for the Project. The Project is part of a wider programme to rehabilitate twelve main road sections, with a total length of approximately 216.3 km, of Montenegro's main roads network, which will be parallel-financed with the European Investment Bank (EIB).

The Project area is situated in the north-east part of Montenegro and is part of the Ibar highway. The location of the Project in Montenegro is indicated in **Figure 1-1** below.

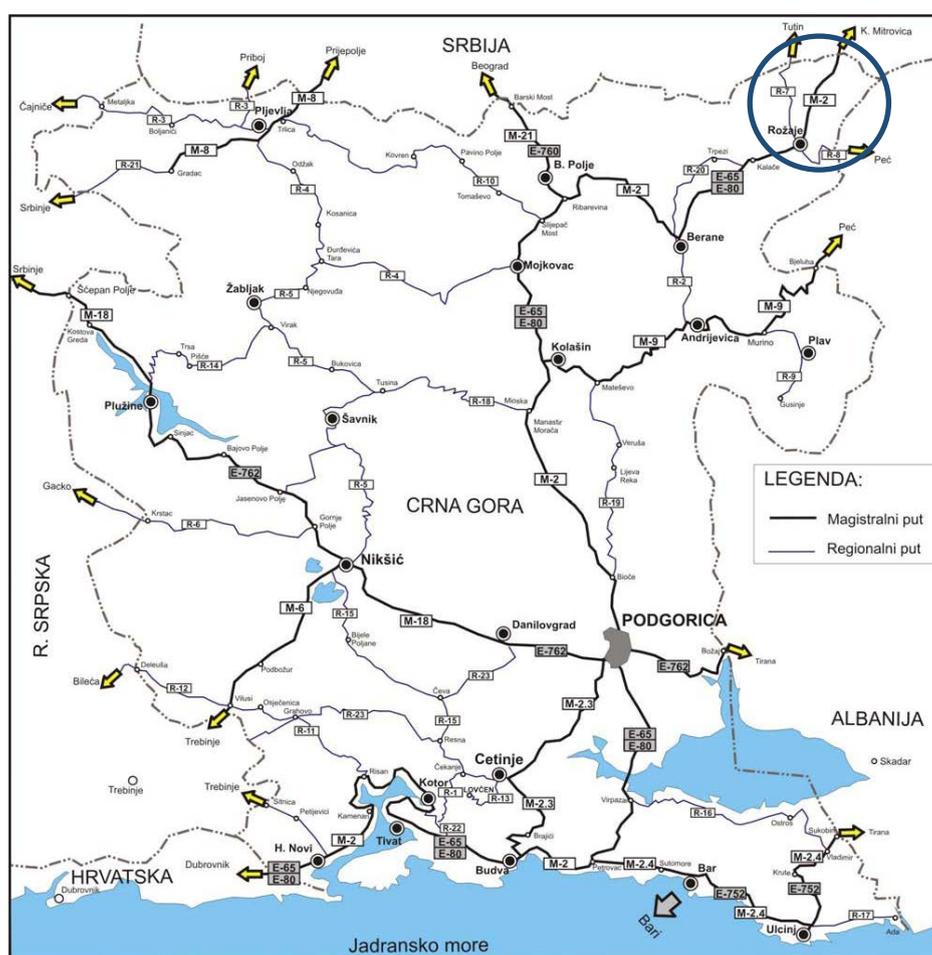


Figure 1-1 Project Location¹

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder engagement process for the Project. The SEP outlines a systematic approach to stakeholder engagement that will help MTD and the Project build and maintain over time a constructive relationship with their stakeholders, in particular, the locally affected communities. The document also includes a grievance mechanism for stakeholders to raise their concerns about the Project.

¹ Original source of figure: Figure 1. Road network (E, M and R) of Montenegro, roads that pass through the Municipality of Rožaje (Spatial and Urban Plan of Municipality Rožaje, 2012)

The Project has been developed by MTD based on the Montenegrin legislative requirements and those of the European Bank for Reconstruction and Development.

Project Background & Need

The main objectives of the Project are to support Montenegro's economic development and contribute to its cross-border integration by improving connectivity between its main cities and between Montenegro and neighbouring Serbia. The Project includes road safety and road quality improvements in keeping with the volume of through traffic on the road section, which includes providing passage to coastal locations for visitors from neighbouring countries.

The Project is included in the Spatial Plan of Montenegro until 2020. The importance of the M-2 road Rožaje-Špiljani has also been recognised by the Spatial and Urban Plan of Municipality Rožaje (2012).

In addition to economic benefits through improvement of transportation networks and the effectiveness of the border crossing with Serbia, the Project is expected to result in an improvement in road safety conditions, including improved lighting and signage and strengthening and revitalising bridges and tunnels, fences and safety nets for rocks; and, mitigating some of the community safety impacts of road traffic on communities within the Project area through new bus stops and potentially with new side stops/rest areas and new sidewalks. The Project will also provide up to 25 short-term local employment opportunities during construction.

2. PROJECT DESCRIPTION

The Project involves the reconstruction of 20 km of the main road M-2 Rožaje - Špiljani from 1148 km + 200 to km 1168 + 200. The reconstruction starts from the intersection "Vuca" (1148 km + 200) to the border with Serbia (1168km + 200). The works are as follows:

- Reconstruction of the intersection "Vuca": This intersection connects the main road M-2 with the regional road Rožaje – Vuca and the industrial zone Rožaje, i.e., Bypass Rožaje.
- Reconstruction of the road: The entire road will be widened from the current 6.0 m to 6.5 m in total. An additional lane of total 600 m (two lanes of 300 m in each traffic direction) will be built at the border crossing Dračenovac. The radii of the curvatures will be extended and all the slopes rehabilitated. The road construction will be strengthened and new traffic signs and road equipment set up.
- Reconstruction of 12 tunnels (total length of 1,678 m): The tunnels will be widened in order to satisfy traffic standards and hydro-isolation will be placed. Tunnel pipes will be extended in order to prevent the rocks falling on the road.
- Three bridges, of total length of 244 m, will be reconstructed. Construction of these bridges will be strengthened and pedestrian lanes provided.
- Eight bridges, of total length of 778 m, will be refurbished and concrete plating repaired.
- No removal will be required of residential or commercial buildings.

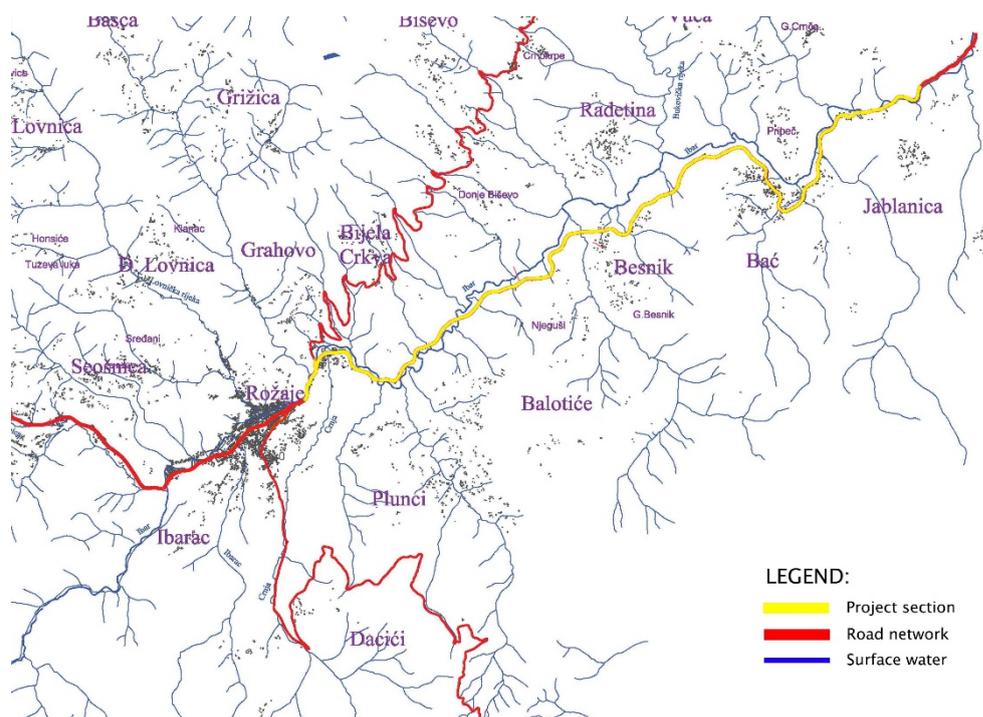
The reconstructed road will have a design speed of 60 km/h (the same as the current speed limit) and will allow access to the same vehicles as the current road.

Pedestrian sidewalks will be incorporated in the Project design in line with the Preliminary Road Safety Audit and pedestrian safety issues will also be further discussed with Municipality Rožaje to gain their feedback on this important topic.

The current road has open / uncontained drainage for storm water. The final design will be reviewed with respect to drainage arrangements but at a minimum the drainage from the road will be sealed and treated before discharge at all locations where the run-off could enter the Ibar and its tributaries or other water bodies.

The layout of the Project is shown in **Figure 2-1** below.

Figure 2-1 Layout of the Project



Along the Project route there are several local roads and accesses on which local communities and businesses are dependent. All local junctions will be either retained or replaced with junctions that meet modern standards and access will be maintained throughout construction and on the main road traffic flow will be maintained in one lane at all times.

The Project will need to use excavated fill material to make up the sub-base layers, as well as material for aggregates for the road surface and any concrete structures. MTD will check on the operational standards of any existing borrow pits prior to use.

For some stretches of the scheme, some excess excavated material may arise and need to be disposed. The ESAP requires that a Site Management Plan be developed, which addresses the discharge of surplus material, as part of a Construction Environmental & Social Management Plan (CESMP), and that it details the expected volumes and locations of spoil generation, planned locations and methods for storage and disposal, and mitigation methods and procedures to be followed for permitting, etc.

Road Safety

One of the key aims of the Project is to deliver improvements in road safety. A Preliminary Design Stage Road Safety Audit has been undertaken for the Project and appropriate requirements will be included in the Project planning and design.

The detailed design will be completed by the end of October 2017.

Status of the Project & Project Schedule

The status of the design & tender documentation, environmental permitting and land acquisition is summarised below:

- **Design & Tender Documentation:** The Main Design is expected to be finished by the end of October 2017. The Main Design and any tender documentation will need to be reviewed and updated by MTD for any matters arising from EBRD requirements, including outcomes from the ongoing EBRD Roads Safety Audit and changes will be made in a way that also complies with the Laws of Montenegro.
- **Environmental Permitting:** The Project does not require a national Environmental Impact Assessment (EIA) or any other environmental permits prior to construction.

- **Land Acquisition:** The Project will require the acquisition of land and assets in an up to 2m strip of land either side of the existing road footprint that will be used for work or as a safety zone. This land is currently a mix of State and privately-owned land. There will be no physical displacement as a result of the Project. No land or assets have been acquired / expropriated to date as the completion of the Main Design is required before the process can begin.
- **Construction Schedule & Workforce Estimate:** MTD currently intend to commence construction in early 2018, with construction completed by 2019. Although employment numbers are not known yet, a road of this type is estimated to need from 100-200 workers to be employed for construction at its peak.

3. REGULATORY CONTEXT

3.1. Key Relevant Montenegro Stakeholder Engagement Legislation

In the Montenegro legal system, legal norms that define or relate to public consultation come from various legal sources. In the first instance and highest legal act – the Constitution defines the concept of public participation (includes: access to information, public participation in decision-making and legal protection of these rights). In addition, Montenegro is member / a party to international treaties that deal with this topic or contain provisions on this issue. The Constitution and international treaties in Montenegro are accompanied by a large number of laws relevant to the Project that contain provisions that specifically contain principles of public participation and access to information and / or apply to these rights: The Aarhus Convention, Law on Free Access to information (O.G., No. 44/12, 30/17), Law on Environment (O.G., No. 48/08, 40/10, 40/11,27/14, 52/16), Law on the Environmental Impact Assessment (EIA) (O.G., No 80/05, O.G, No. 40/10, 73/10, 40/11, 27/13, 52/16), Law on the Strategic Environmental Impact Assessment (SEA) (O.G., No. 80/05, O.G., No. 40/11, 59/11, 52/16), Law on Spatial Development and Construction of Structures (O.G., No. 51 as of 22 August 2008, 40/10, 34/11, 47/11, 35/13, 39/13, 33/14), and Law on Expropriation (O.G., No. 5/00, 12/02, 28/06, 21/08, 30/2017).

Stakeholder engagement in Montenegro is mainly connected to the preparation of relevant planning documents and SEA, the EIA/Environmental Permit process, expropriation process, and other laws. Public consultations and engagement are led by the Competent Ministry and supported by local municipal authorities involved in a project. Projects/programs use the EIA and SEA process as the main instrument for engaging the public and fostering public participation.

A summary of any planning areas to which these laws apply directly for the Project is provided in **Table 3.1**.

Table 3-1 Laws in Effect in Montenegro Requiring Specific Stakeholder Engagement for Project Steps

Legislative Area	Law & Year of Passage
Preparation of project documentation and related strategic studies	Law on Spatial Development and Construction of Structures (O.G., No. 51 as of 22 August 2008, 40/10, 34/11, 47/11, 35/13, 39/13, 33/14).
Strategic impact assessment of spatial plans	Law on the Strategic Environmental Impact Assessment (SEA) (O.G., No. 80/05, O.G., No. 40/11, 59/11, 52/16).
EIA and Environmental Permit Process	Law on the Environmental Impact Assessment (EIA) (O.G., No 80/05, O.G., No. 40/10, 73/10, 40/11, 27/13, 52/16).
Land acquisition (expropriation)	Law on Expropriation (O.G., No. 5/00, 12/02, 28/06, 21/08, 30/2017).

Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters, 1998 (Montenegro acceded in 2009). The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. It focuses on interactions between the public and public authorities.

Law on Free Access to information (O.G., 44/12, 30/17). This law provides for the right to access information as a general right.

Law on Spatial Development and Construction of Structures (O.G., No. 51 as of 22 August 2008, 40/10, 34/11, 47/11, 35/13, 39/13, 33/14). This new Law is currently in the procedure of public hearings. In Article 6 of the Law - *Public Participation*, it is stated that every person shall have the right, in accordance with Law, to be informed on affairs pertaining to spatial development and construction of structures, to propose initiatives, give opinions or otherwise participate in affairs related to spatial development and construction of structures. This includes construction of roads.

Law on Environment (O.G., No. 48/08, 40/10, 40/11,27/14, 52/16) states that public/everyone has the right to be informed about the state of the environment and to participate in the decision-making process whose implementation could affect the environment, and that the environmental data are public. Article 68 of the Law defines what type of information shall be published via electronic databases or media (e.g. web site of the Agency). Article 72 provides information on public participation: State administration bodies, administration bodies and local government bodies competent for environmental protection are obliged to inform the public about environmental decision-making procedures relating to: strategic assessment of the impact of plans and programs on the environment; assessment of the environmental impact of projects/activities; the procedure for issuing a permit for integrated pollution prevention and control of approving the operation of new or existing plants; strategies, plans, programs and other documents in the field of environmental protection; and other issues in the field of environment in accordance with special regulations.

Law on the Strategic Environmental Impact Assessment (SEA) (O.G., No. 80/05, O.G., No. 40/11, 59/11, 52/16) contains articles that stipulate public participation and availability of data. The competent authority for the preparation of the plan and programs shall submit to the interested bodies and organizations the SEA for comment. The interested bodies and organizations are obliged to submit comments within 30 days from the date of submission of the SEA report. Article 20 of the Law, stipulates the public hearing by the competent authority for the preparation of plans and programs. The report must be prepared within 30 days from the date of the completion of the public hearing and shall contain a statement of all accepted or unaccepted opinions.

Law on the Environmental Impact Assessment (EIA) (O.G., No 80/05, O.G., No. 40/10, 73/10, 40/11, 27/13, 52/16) The Law regulates the environmental impact assessment procedure for projects that can have a significant impact on the environment, including the participation of interested authorities and organizations and the public. It contains a chapter dedicated to reporting, keeping records and providing information for inspection. The law envisages a deadline in which the competent authority is obliged to submit complete documentation on the conducted impact assessment procedure to the interested authorities and organizations and to the public, on written request. The law also contains a provision on the handling of requests for access to information, so it is envisaged that data related to emissions of harmful substances, accident risks, monitoring results and inspection control cannot be protected by business, official or state secrets. The EIA process is carried out according to the phases indicated in **Figure 3-1** (red numbers indicating the longest typical extent of the process and black the shortest, with variations in between based on comments received, any additional documents needed etc.).

In accordance with both the Law on the Environmental Impact Assessment and Law on the Strategic Environmental Impact Assessment, when an intended project may have a significant impact on the environment in another country, or when another state whose environment could be significantly threatened requests so, the state authority responsible for environmental protection issues shall promptly, and not later than within the deadlines set forth for informing its own public, submit to another state the information concerning (in accordance with the 1991 UNECE Convention on Environmental Impact Assessment in a Transboundary Context -Espoo Convention):

- the project, together with all available data on its possible impacts;
- the nature of the decision that may be adopted; and
- the period within which another state can announce its intention to participate in the impact assessment procedure.

The public is also consulted for projects with trans-boundary impact.

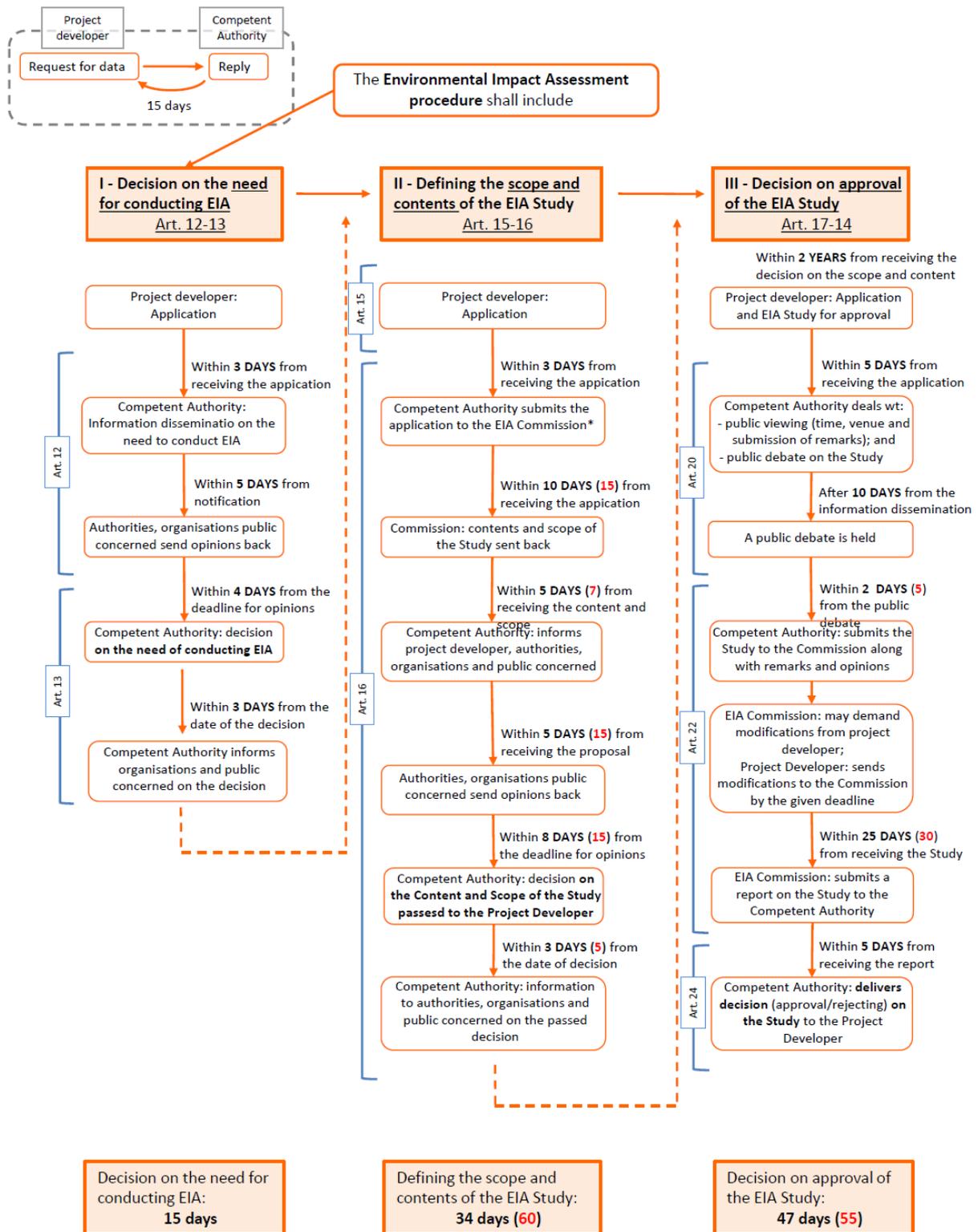


Figure 3-1 EIA process in Montenegro

Land Acquisition Legal Framework and Process

Law on Expropriation (O.G., No. 5/00, 12/02, 28/06, 21/08, 30/2017) contains the process of expropriation. Public interest is established either through a separate law or by a decision of the Government of Montenegro and has been established for the Project.

The proposal for determining public interest, which must include information on properties that are to be affected and their registered owners, was submitted to the Government of Montenegro by the Beneficiary of Expropriation (MTD), through the responsible Administrative Authority (the Real Estate Directorate). Once the Main Design has been completed, MTD will develop an Expropriation Study, which will contain a final list of all affected land plots, registered assets (i.e. structures) and their owners, as recorded in the Cadastre.

In the process of informing affected owners / users of land about the initiation of expropriation, municipal Real Estate Directorates and municipality representatives either organise joint meetings (in locations where the population is living in concentrated settlements) or invite each affected owner / user to an individual hearing. Further interaction with MTD continues until the decision on expropriation becomes legally binding. During this time, affected people are also in communication with the Real Estate Directorate's Commission for Value Assessment, when their land and assets are being appraised and when an offer for compensation is being made to them.

3.2. EBRD Requirements

The Project has been screened as a Category B project under EBRD's Environmental & Social Policy 2008, and has been assessed against the EBRD Performance Requirements (PRs) contained within the policy (<http://www.ebrd.com/pages/about/principles/sustainability/policy.shtml>).

From these investigations and building on the principles set out in accordance with Montenegrin legislation, a **Non-Technical Summary (NTS)** and an **EBRD Environmental & Social Action Plan (ESAP)** has been prepared in-line with PR 1 (*Assessment & Management of Environmental & Social Impacts & Issues*) to address both the construction and operational phases of the Project.

The land acquisition process is currently at an early stage, and a **Land Acquisition and Livelihood Restoration Plan (LALRP)** will be developed for the Project to guide and document the land acquisition process in accordance with Montenegrin law and EBRD PR 5 (*Land Acquisition, Involuntary Resettlement and Economic Displacement*). Land acquisition will be initiated after the final design is completed in October 2017. The LALRP will be disclosed separately once prepared by MTD.

Finally, this Stakeholder Engagement Plan has been developed, in accordance with EBRD PR 10 (*Information Disclosure and Stakeholder Engagement*). EBRD consider community engagement as being central to the successful management of risks and impacts on communities affected by projects, as well as central to achieving enhanced community benefits.

4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT

In accordance with the legislative requirements of the Montenegro, summarised in *Section 3.1*, stakeholder engagement activities have been organised during the development of the Project to date. With the exception of specifically contacting the listed NGOs, all stakeholders listed in **Table 5.2** below have been contacted to date regarding the Project.

Stakeholder engagement has been ensured through development of strategic documents on both the national and local level: **Spatial Plan of Montenegro until 2020 (2008)**, with Public hearings held, along with extensive broadcast on TV shows, radio broadcasting and in newspapers, and the **Spatial and Urban Plan of Municipality Rožaje (2012) and associated Strategic Environmental Assessment (2012)**.

MTD has also obtained the decision, dated August 5, 2014, from the **Montenegro Environmental Protection Agency** that the Project has been screened under the Montenegrin Law on Environmental Impact Assessment (EIA) (including the Decree of projects that are subject of EIA (O.G. of Montenegro No.20/07 and Nos. 27/13, 47/13, 53/14) and it has been determined that an EIA is not required.

MTD has also discussed the preliminary Project plans with **Municipality Rožaje**, and these discussions are ongoing. The next planned engagement for Municipality Rožaje is to coincide with the availability of the Main Design. No specific feedback or suggestion for Project changes has been provided by the Municipality on the Project plans so far, but discussions are continuing. Pedestrian sidewalks will be incorporated in the Project design in line with the Preliminary Road Safety Audit and pedestrian safety issues will also be further discussed with Municipality Rožaje to gain their feedback on this important topic.

5. IDENTIFICATION OF PROJECT STAKEHOLDERS

In order to define a communication process in line with EBRD PR 10, MTD has identified stakeholder groups that may be affected by (**Table 5.1**) and/or interested in (**Table 5.2**) the implementation of the Project. With the exception of specifically contacting the listed NGOs, all stakeholders listed in Table 5.2 below have been engaged to date regarding the Project in accordance with national development processes. Specific details of how these stakeholders will be engaged or informed going forward are described in Section 6. Any suggestions for improvement of proposed communication methods or media are welcomed and can be submitted via the contact information for MTD, at the end of this document.

The project footprint runs through or near to Rožaje and the villages of Bijela Crkva, Balotiće, Besnik, Bać, and Jablanica. The community of Špiljani is the nearest community across the border with Serbia, though no Project effects are anticipated at this location.

Table 5-1 Summary of Affected Parties

Affected party	Likely communication methods
Landowners / land users / residents / business owners affected by future land acquisition	Group and individual meetings with households / individuals, public meetings, local media / local community and municipal bulletin boards.
Landowners / land users / residents / business owners in the proximity of the project footprint	Group meetings with households / individuals, public meetings, local media / local community and municipal bulletin boards.
Road users	Local media announcements / notices along the road.
Workers (including any subcontractors workers)	Individual meetings / internal workers' meetings.

Table 5-2 Summary of Engaged and Interested Parties

Engaged or Interested party	Contact details	Likely communication methods
Montenegro authorities		
Ministry of Transport and Maritime Affairs (MoTMA)	Address: Rimski trg 46 81000 Podgorica, Montenegro Tel: +382 20 234 179 Fax: +382 20 234 331 Web: http://www.msp.gov.me	Official correspondence / meetings
Ministry of Sustainable Development and Tourism (MSDT)	Address: IV Proleterska 19 81000 Podgorica, Montenegro Tel: +382 20 446 200 Fax: +382 20 446 215 Web: http://www.mrt.gov.me	Official correspondence / meetings
Ministry of Finance (MoF)	Address: Stanka Dragojevića 2 81000 Podgorica, Montenegro Tel: +382 20 242 835 E-mail: mf@mif.gov.me Fax: +382 20 224 450 Web: http://www.mif.gov.me	Official correspondence / meetings
Ministry of Agriculture and Rural Development (MARD)	Address: Rimski trg 46 81000 Podgorica, Montenegro Tel: +382 20 482 109 E-mail: kabinet@mpr.gov.me Fax: +382 20 234 306 Web: http://www.mpr.gov.me	Official correspondence / meetings
Ministry of Health (MoH)	Address: Rimski trg 46 81000 Podgorica, Montenegro Tel: +382 20 242 276 E-mail: mzdravlja@mzd.gov.me	Official correspondence / meetings

	Fax: +382 20 242 762 Web: http://www.mzd.gov.me	
Ministry of Interior Affairs (Moi)	Address: Bulevar Svetog Petra Cetinjskog 22, 81000 Podgorica, Montenegro Tel: +382 20 241 590 E-mail: kabinet@mup.gov.me Fax: +382 20 246 779 Web: http://www.mup.gov.me/ministarstvo	Official correspondence / meetings
Ministry of Culture (MoC)	Address: Adresa: Ulica Njegoševa bb, 81250 Cetinje, Montenegro Tel: +382 41 232 571 E-mail: kabinet.kultura@mku.gov.me Fax: +382 41 232 572 Web: http://www.mku.gov.me	Official correspondence / meetings
Ministry of Economy (MoE)	Address: Rimski trg 46 81000 Podgorica, Montenegro Tel: +382 20 482 163 Fax: +382 20 234 027 Web: www.mek.gov.me	Official correspondence / meetings
Institutions		
Institute for Hydrometeorology and Seismology of Montenegro (IHSM)	IV proleterske 19, 81000 Podgorica, Montenegro Tel: +382 20 655 183 Fax: +382 20 655 197 E-mail: office@meteo.co.me ; webmaster@meteo.co.me Web: http://www.meteo.co.me/	Official correspondence / meetings
Statistical office of Montenegro - MONSTAT	IV Proleterske 2, 81000 Podgorica, Crna Gora Tel +382 20/230-811 Fax +382 20/230-814 E-mail: statistika@t-com.me ; contact@monstat.org Web: http://www.monstat.org/cg/	Official correspondence / meetings
Local authorities		
Municipality Rožaje	Address: Maršala Tita bb, 84 310 Rožaje, Montenegro Tel +382 (0) 51/270-430, Fax +382 (0) 51/270-432 e-mail: opstina@rozaje.me Web: http://www.rozaje.me	Official correspondence / meetings
Local councils		Official correspondence / meetings
Public Infrastructure Companies		
Directorate for Public Works	Address: IV proleterske 19 81000 Podgorica, Montenegro Tel: +382 20 655 095, 655 364 Fax: +382 20 655 359 E-mail: direkcijazasaobracaj@dzs.gov.me Web: http://www.dzscg.com/	Official correspondence / meetings

Others		
NGO Green Home	Address: Dalmatinska 78 81 000 Podgorica Crna Gora Tel: +382 20 609 375 Fax: +382 20 609 376 E-mail: greenhome@greenhome.co.me Web: http://www.greenhome.co.me	Public meetings / media / website disclosure
NGO Ozon	Ul. Serdara Jola Piletića bb, 81 400 Nikšić Ul. Dr Vukašina Markovića, (zgrada Ave Marija Koljčević), st 4, 81 000 Podgorica, Montenegro T/f: +382 40 241 063 E: info@ozon.org.me Web: www.ozon.org.me	Public meetings / media / website disclosure
FORS Montenegro (Foundation for the Development of Northern Montenegro)	Address: Ivana Milutinovića 10 Nikšić, 81400 Tel: +382 40 212 484 Fax: +382 40 212 484 E-mail: mailbox@forsmontenegro.org Web: http://www.forsmontenegro.org/	Public meetings / media / website disclosure
Other interested NGOs		Meetings / media / website disclosure

6. STAKEHOLDER ENGAGEMENT PROGRAMME

MTD intends to provide all relevant information to the public. As of October 2017, all interested and affected parties will be able to find the following documents on the MTD website (www.dzscg.com) and the EBRD website (www.ebrd.com) in English and Montenegrin:

- Project Non-Technical Summary (October 2017).
- This Stakeholder Engagement Plan (October 2017).

The Land Acquisition & Livelihood Restoration Plan for the Project will also be added to the website prior to any changes in land access or land acquisition as it is under preparation by MTD.

In addition, hard copies of these documents will be available at the following locations (addresses provided at the end of the document):

- Montenegro Transport Directorate.
- Municipality Rožaje.
- EBRD office in Podgorica.

These documents will remain in the public domain for the duration of the Project. The SEP will be periodically updated, including with engagement activities to provide updates on any changes to Project design and mitigation measures, as appropriate.

All meetings and consultations will be documented by MTD providing the date when the meeting/consultation was held, list of attendees, and a summary of the discussions.

Consultation with Municipalities

MTD has discussed the preliminary Project design with Municipality Rožaje, and these discussions are ongoing. No specific feedback or suggestion for Project changes has been provided by the Municipality on the Project plans so far. The next planned engagement is to coincide with the availability of the Main Design. Pedestrian sidewalks will be incorporated in the Project design in line with the Preliminary Road Safety Audit and pedestrian safety issues will also be further discussed with Municipality Rožaje to gain their feedback on this important topic.

Discussions will also include plans for expropriation, continued local access and general information materials for the communities during construction and the most effective locations and methods for sharing of this information.

Although no Project activities extend beyond the national border, MTD will confirm any transboundary communications protocols that the Municipality has with Serbian local authorities for activities near the border, for example timing of works, and support those with respect to the Project. Disclosure of the SEP to the appropriate Serbian local authorities will be undertaken as part of this.

MTD will also discuss plans for monitoring of air quality, noise and water quality for the Project with Municipality Rožaje to confirm whether any data collection is already underway by the Municipality that can support the Project or that the Project can feed into.

Consultation Related to Land Expropriation

In the process of informing (and soliciting feedback) affected owners / users of land about the initiation of expropriation, the Real Estate Directorate and municipality representatives will either organise joint meetings (in locations where the population is living in concentrated settlements) or invite each affected owner / user to an individual hearing. During the land acquisition process, affected people are also in communication with the Real Estate Directorate's Commission for Value Assessment, when their land and assets are being appraised and when an offer for compensation is being made to them.

MTD will participate in this engagement as needed to ensure that the engagement also meets the needs of the EBRD. The specific engagement planned by MTD will be detailed in the Land Acquisition & Livelihood Restoration Plan, and will include:

- Ensuring that informal land users are also engaged and compensated as appropriate;
- Gathering the information needed for the Project Land Acquisition & Livelihood Restoration Plan, including land and asset valuations;
- Providing explanations of the revised construction access arrangements and access to the Project road when completed; this will be done using the Project maps; and
- Preparing consultation materials in Montenegrin, such a pamphlets and posters on the expropriation process, and information on the Grievance Mechanism for the Project to support the consultation with affected persons.

There are also a number of small shrines along the road to pay respect to where people have lost their lives in road accidents. MTD will work with the Municipality to identify and contact the families to temporarily move these shrines as needed during construction, and for their potential return once construction is complete. Any resultant measures will be incorporated in the CESMP for the Project.

Consultation Related to Construction and Operation

During construction MTD and the Contractor(s) will:

- inform the public and utility companies of the general timetable for construction activities;
- advertise employment opportunities locally;
- inform affected communities on the progress of construction;
- inform affected communities about any construction activities that may affect them, in advance of the activities, including any significant anticipated impacts and proposed mitigation measures, seeking feedback on the successfulness of the implementation of these measures. This will include measures for construction site safety for the public.

Mechanisms will include information boards installed at project borders by MTD / the Contractor with general information on the Project i.e. the Company, Contractor, Main Supervisor, and schedule of works.

MTD and Contractor(s) will also use various other forms of communication, for example, the website of MTD, press releases in the local media, and community bulletin boards.

The public will also be able to use the grievance procedure described in Section 7 below. Information regarding the grievance procedure will be widely disseminated to affected local communities as part of the expropriation and construction planning process.

Throughout the life of the Project, MTD and Contractor(s) will continue to engage with stakeholders

and this Stakeholder Engagement Plan will be updated to reflect Project progress. Annual environment and safety reports will also be published on the MTD website.

7. GRIEVANCE MECHANISM AND COMPLAINTS PROCEDURE

A grievance mechanism will be adopted as presented in **Figure 7.1**. MTD and the Contractor(s) will accept all comments and complaints associated with the Project. A sample of the Projects Public Grievance Form is provided at the end of this document. Any person or organisation may send comments and/or complaints in person, by phone, via post, or email using the contact information provided at the end of the document.

All comments and complaints will be responded to either verbally or in writing, in accordance with the preferred method of communication specified by the complainant, if contact details of the complainant are provided.

All grievances will be registered and acknowledged within 5 working days and responded to within 20 working days. Individuals who submit their comments or grievances have the right to request that their name be kept confidential.

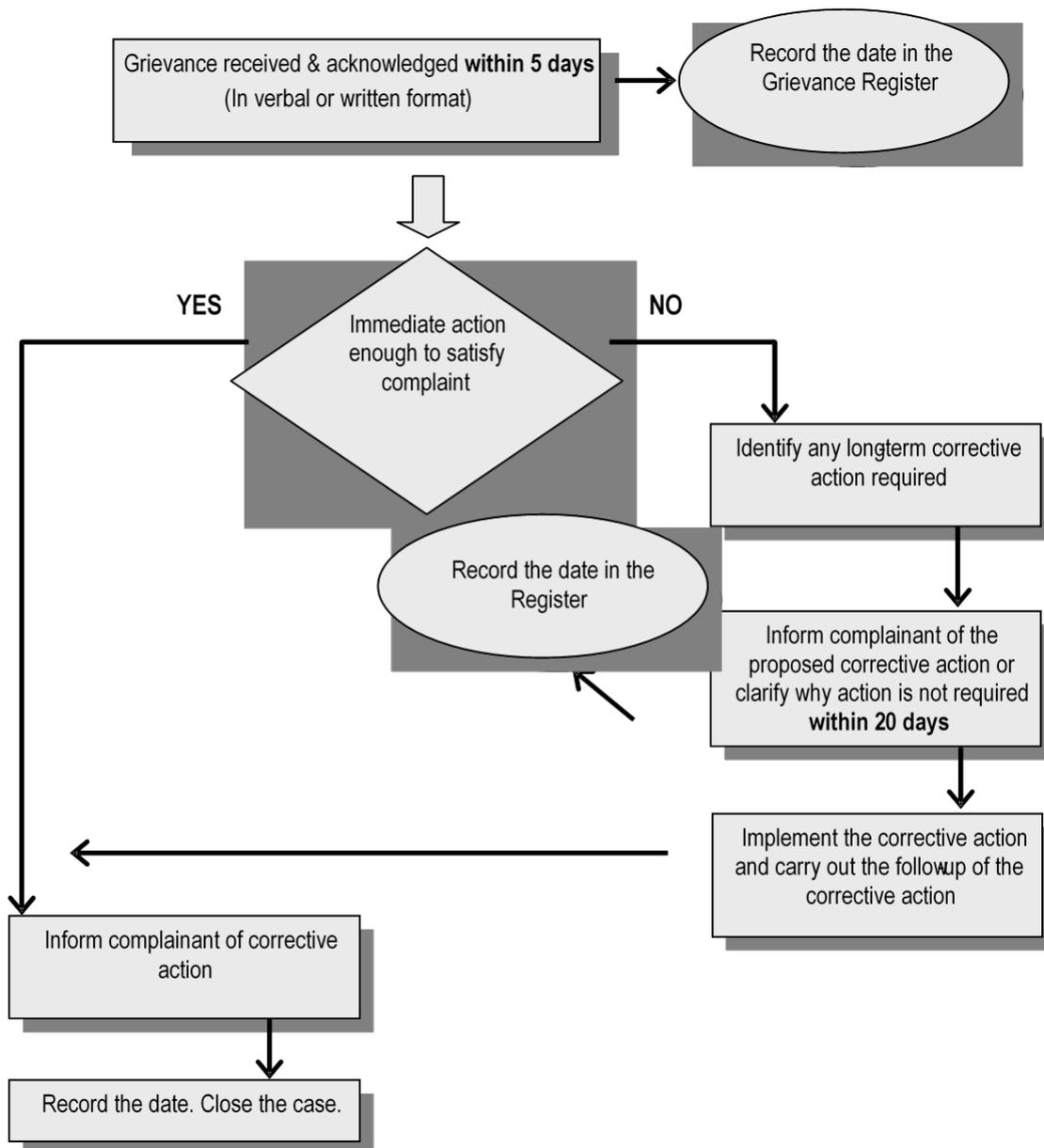
MTD will monitor the way in which grievances are being handled by the Contractor(s) and ensure they are properly addressed within deadlines specified above.

MTD will keep a grievance log of all grievances (including those received and addressed by the Contractor(s)), based on which grievance management reports will be produced and included in the annual environment and safety reports, published on the MTD website.

A separate grievance mechanism is available for workers of the Contractor(s).

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of Montenegro.

Figure 7-1 Grievance Mechanism



8. REPORTING

Throughout the Project, MTD will communicate with relevant stakeholders and inform them on any significant issues, for example, changes in the construction deadlines. MTD will provide Project updates on its web site.

MTD will produce annual environment and safety reports, which will include a summary of the Project performance on management of health, safety, environment and social issues. This will be posted on the MTD website.

Contact Details for the Public

Ministry of Transport and Maritime Affairs
Contact person: Mile Ostojic, Transport Directorate,
IV proleterske 19, 81000 Podgorica, Montenegro
Email: mile.ostojic@dzs.gov.me
Tel: +382 67 316 185
Tel: +382 20 655 359
<http://www.msp.gov.me/en/ministry>

Contact details of the Contractor(s) could not be added at the time when this version of the SEP was being developed and will be added subsequently, when the Contractor(s) have been identified.

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e-mail: opstina@rozaje.me
Web: <http://www.rozaje.me>

Public Grievance Form

Reference No:	
Full Name	
Contact Information	<input type="checkbox"/> By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> By Telephone: _____
	<input type="checkbox"/> By E-mail _____
Preferred language for communication	<input type="checkbox"/> Montenegrin <input type="checkbox"/> Other (Please state language):
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	
	<input type="checkbox"/> One time incident/grievance (date_____) <input type="checkbox"/> Happened more than once (how many times?_____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature: _____

Date: _____

Please return this form to: Mile Ostojic, Transport Directorate,
 IV proleterske 19, 81000 Podgorica, Montenegro
 Email: mile.ostojic@dzs.gov.me
 Tel: +382 67 316 185
 Tel: +382 20 655 359