

SAVA AND DRINA RIVERS CORRIDORS INTEGRATED  
DEVELOPMENT PROJECT

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STAKEHOLDER ENGAGEMENT PLAN  
FOR MONTENEGRO

February 2020

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## Table of Contents

<b>1</b>	<b>INTRODUCTION .....</b>	<b>6</b>
1.1	Objectives and Scope of this Stakeholder Engagement Plan .....	6
1.2	Brief Description the Project .....	7
1.2.1	Objectives.....	7
1.2.2	Components .....	7
1.2.3	Implementation Arrangements .....	7
1.2.4	Timeline and Budget .....	9
1.2.5	Summary of Potential Environmental and Social Impacts.....	8
1.2.6	Project Locations.....	9
<b>2</b>	<b>REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT IN MONTENEGRO.....</b>	<b>10</b>
<b>3</b>	<b>WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT .....</b>	<b>13</b>
<b>4</b>	<b>PREVIOUS STAKEHOLDER ENGAGEMENT .....</b>	<b>15</b>
4.1	Lessons Learned on Stakeholder Engagement from Previous Projects .....	17
<b>5</b>	<b>STAKEHOLDER IDENTIFICATION AND ANALYSIS .....</b>	<b>18</b>
5.1	Introduction .....	18
5.2	Stakeholder Identification and Mapping.....	18
5.3	Disadvantaged/ Vulnerable Individuals and Groups .....	19
5.4	Stakeholder Analysis.....	20
5.5	Gender Analysis, Actions and Indicators .....	23
5.6	Stakeholder Expansion .....	23
5.7	Planned Stakeholder Engagement Activities.....	24
<b>6</b>	<b>STAKEHOLDER ENGAGEMENT PROGRAM.....</b>	<b>30</b>
6.1	Details on Engagement Methods to Be Used.....	30
6.1.1	Project Outreach Methods.....	30
6.1.2	Mass/Social Media Communication .....	30
6.1.3	Communication Materials.....	30
6.1.4	Grievance Mechanism.....	30
6.1.5	Information Desks .....	31
6.1.6	Citizen/PAP Perception Survey and Feedback .....	31
6.1.7	Trainingsand Workshops.....	31
6.1.8	Proposed Strategy to Incorporate the View of Vulnerable Groups.....	31
6.2	Information Disclosure .....	31

6.3	Stakeholder Engagement Log .....	32
6.4	Transboundary Communication .....	32
<b>7</b>	<b>IMPLEMENTATION ARRANGEMENTS AND INSTITUTIONAL ANALYSIS FOR STAKEHOLDER ENGAGEMENT...</b>	<b>33</b>
7.1	Project Enabling Efforts from Lessons Learned .....	33
7.2	Roles and Responsibilities .....	33
<b>8</b>	<b>GRIEVANCE MECHANISM .....</b>	<b>34</b>
8.1	Raising Grievances .....	34
8.2	Grievances Administration .....	35
8.3	Grievance and Beneficiary Feedback Reporting.....	35
8.4	Grievance Log .....	36
8.5	Grievance Admission Channels.....	36
8.6	Monitoring and Reporting on Grievances .....	36
8.7	World Bank Grievance Redress System.....	37
<b>9</b>	<b>SEP MONITORING AND REPORTING .....</b>	<b>38</b>
9.1	Monitoring Reports during Construction .....	38
9.2	Reporting Frequency .....	39
9.3	Involvement of Stakeholders in Monitoring Activities .....	39
9.4	Reporting Back to Stakeholder Groups .....	39
<b>10</b>	<b>DISCLOSURE AND CONSULTATION REQUIREMENTS.....</b>	<b>40</b>
<b>11</b>	<b>ESTIMATED BUDGET .....</b>	<b>41</b>
	Annex A. Project Grievance Form .....	42
	Annex B. Sample of Stakeholder Engagement Log.....	44

## List of Definitions for Terms Used in This Document

<b>CONSULTATION</b>	The process of sharing information and getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
<b>ENVIRONMENTAL AND SOCIAL STANDARDS</b>	The 10 Environmental and Social Standards (ESSs) set out the requirements that apply to all new World Bank investment project financing enabling the World Bank and the Borrower to manage environmental and social risks of projects.
<b>PAP</b>	“Project Affected Person” is any person who, as a result of the implementation of a project, loses the right to own, use, or otherwise benefit from a built structure, land (residential, agricultural, or pasture), annual or perennial crops and trees, or any other fixed or moveable asset, either in full or in part, permanently or temporarily.
<b>PROJECT</b>	Refers to the Sava and Drina Rivers Corridors Integrated Development Project
<b>STAKEHOLDERS</b>	Refers to individuals or groups who: (a) are affected or likely to be affected by the project ( <i>project-affected parties</i> ); and (b) may have an interest in the project ( <i>other interested parties</i> ).
<b>STAKEHOLDER ENGAGEMENT</b>	A continuous process in which the Project builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. It includes a range of activities and interactions over the life of the project such as stakeholder identification and analysis, information disclosure, stakeholder consultation, negotiations and partnerships, grievance management, and reporting to stakeholders and management functions
<b>STAKEHOLDER ENGAGEMENT PLAN</b>	A plan which assists the Borrower to effectively engage with stakeholders throughout the life of the project and specifying activities that will be implemented to manage or enhance engagement.
<b>VULNERABLE GROUPS</b>	People, especially those below the poverty line, the landless, the elderly, women and children, or other displaced persons who may not be protected through national land compensation legislation, who by virtue of gender, ethnicity, age, physical or mental disability, economic disadvantage, or social status may be more adversely affected by resettlement than others and who may be limited in their ability to claim or take advantage of resettlement assistance and related development benefits.

## Abbreviations

BiH	Bosnia and Herzegovina
CPF	Country Partnership Framework
CGD	Central Grievance Desk
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESSs	Environmental and Social Standards
EU	European Union
ESSs	Environmental and Social Standards of World Bank
FY	Fiscal Year
GM	Grievance Mechanism
GRS	Grievance Redress System
LGD	Local Grievance Desks
LMP	Labor Management Procedures
MARD	Ministry of Agriculture and Rural Development
MNE	Montenegro
M&E	Monitoring and Evaluation
OIPs	Other interested parties
PAP	Project Affected People
PIU	Project Implementation Unit
RS	Republika Srpska
SDIP	Sava and Drina Rivers Corridors Integrated Development Program
SEP	Stakeholder Engagement Plan
SEL	Stakeholder Engagement Log
WB	World Bank

## 1 INTRODUCTION

The development objective of the Sava and Drina Rivers Corridors Integrated Development Program is to improve flood protection and enable transboundary water cooperation in the Sava and Drina Rivers Corridors. The Project consists of four components, will be implemented over a period of 10 years, organized in two phases. The sub-projects in Montenegro will be managed by a PIU within the Ministry of Agriculture and Rural Development.

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

Pursuant to the World Bank requirements, stakeholder engagement is an inclusive process implemented throughout project life-cycle, and it is most effective if launched at early stage of project development. Engagement should begin as early as possible at project preparation, as timely identification of and consultation with the stakeholders enable views and opinions of these groups to be taken into account in the project design and implementation.

Stakeholder engagement is continuous and iterative process through which the Borrower identifies, communicates and facilitates two-way dialogue with persons affected by project decision and activities, as well as with other stakeholders interested in the project. Different needs of various groups and individuals, particularly the disadvantaged and vulnerable ones, are taken into account.

In order to address adequately need of different groups, communication and information channels for all identified stakeholders are designed in line with their needs. Participatory process would be used to get comments and proposals for Project design, which may help improve the Project design and bring more advantages at local level.

Stakeholder requests, needs and expectations would be identified before Project design development, while PIU would be obliged to establish sustainable communication with stakeholder groups, namely to inform them regularly on the project and to report on potential changes.

The objective of this Stakeholder Engagement Plan (SEP) is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of this SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the laws of Montenegro, as well as the requirements of the World Bank (WB) Environmental and Social Standards (ESSs).

The SEP shall be applicable to all activities planned under the Project in Phase I, while the adequacy of this SEP shall be assessed and update as the case may be prior to commencement of Phase II. The stakeholder engagement will be an integral part of the project's environmental and social performance and project design and implementation.

The document comprises 11 Chapters. Chapter 1 introduces the Project and its objectives, followed by Chapter 2 listing the regulatory framework Montenegro, which provides the framework for SEP in addition to the World Bank ESS10 presented in Chapter 3. A summary of stakeholder engagement held so far is presented in Chapter 4. Stakeholder identification, mapping and analysis are described in Chapter 5. The Stakeholder engagement activities are presented in Chapter 6. Implementation arrangements for implementing the SEP are presented in Chapter 7. Description of the Project's Grievance Mechanism (GM) follows in Chapter 8. Monitoring, documentation and reporting are presented in Chapter 9, disclosure and consultation requirements in Chapter 10, while the budget needed for implementation of the SEP is discussed in Chapter 11.

## 1.2 Brief Description the Project

### 1.2.1 Objectives

**The Higher-level Objective** of the Sava and Drina Rivers Corridors Integrated Development Program (SDIP) is to strengthen transboundary water cooperation and improve navigability and flood protection in the Sava and Drina Rivers Corridors.

**The Development Objective** of the SDIP (Phase 1 of the Program) is to improve flood protection and enable transboundary water cooperation in the Sava and Drina Rivers Corridors.

### 1.2.2 Components

This project will implement subprojects with high implementation readiness and relevance to the program objectives, with detail designs and tender documents likely ready by Effectiveness in Montenegro, Bosnia and Herzegovina (BiH) and Serbia, while simultaneously preparing subprojects that will be implemented during the second phase of the Regional Program. The project consists of four components as described below:

#### Component 1: Integrated Management and Development of the Sava Rivers Corridors

Sub-component 1.1: **Flood protection, environmental management and climate change adaptation.** This sub-component will finance construction and rehabilitation of embankments at selected priority areas along the Sava River Corridor as well as nature-based solutions to re-vitalize selected protected areas of ecological significance to the Western Balkans. Upgraded flood protection capacity (at or above 1 in 100-year event) also enhance climate adaptation capacity of protected areas.

Sub-component 1.2: **Waterway improvements.** Under this sub-component, grant financing will be mobilized to finance demining activities along the Sava's right bank within BiH, as a pre-requisite to the execution of civil works—planned for Phase II of the program—to increase the navigational capacity of the Sava river. The preparatory documentation for these Phase II works (engineering designs, environmental and social safeguards instruments, expected climate change impacts on navigability, bidding documents) will also be finalized during the project. The project-supported demining efforts are also an operational pre-requisite to the planned improvements to Sava river ports under Phase II. Demining activities are proposed as a no-regret investment that will help unlock the river's economic potential for generations to come.

#### Component 2: Integrated Management and Development of the Drina River Corridor

Sub-component 2.1: **Flood protection and environmental management.** This sub-component will finance infrastructure works, studies, surveys, consultations and preparation of detailed design of interventions related to the management of environmental assets (the protection of local ecosystems that act as carbon sinks) along the Drina Corridor. The on-going GEF-SCCF-financed Drina River Basin Management project as well as the ESMAP technical assistance, are conducting studies that will identify the additional actions needed for flood protection, bank stabilization, drainage and river training works, and reservoir management in the Drina Corridor. Upgraded flood protection capacity (at or above 1 in 100-year event) also enhance climate adaptation capacity of protected areas.

Sub-component 2.2: **Integrated development of Drina watershed.** This sub-component will finance improved watershed management in the Lim and Grncar River basins of Montenegro, as well as works related to flood protection, drainage and irrigation measures within the Lim River Basin (a tributary of the Drina River) to mitigate flood risks and promote sustainable use of natural resources. These measures include: river bank stabilization; river training works; flood protection embankments and dykes. The detailed designs of these investments are

under preparation through the ongoing GEF-SCCF project. This sub-component will further finance the preparation of selected priority investments in line with the project development objective.

### Component 3: Project preparation and management

Sub-component 3.1: **Project preparation.** This sub-component will finance preparation of project documentation for phase II of the program, including environmental and social assessments.

Sub-component 3.2: **Institutional strengthening and project management.** This sub-component will finance activities to increase institutional capacity and inter-sectoral coordination in the participating countries to ensure more efficient decision making and program management at regional level. This sub-component will promote joint action and decision making in river basin management and flood risk management among riparian countries, thus enhance the climate adaptation capacity of the region.

### Component 4: Regional activities

This component will support policy dialogue, consultations, preparation of plans and studies, and investments to strengthen the nexus between water services and connectivity with the regional development and economic cooperation objectives of the Sava and Drina Corridor. An advocacy and communication plan will be prepared and implemented to promote regional cooperation. Regional studies (i.e., hydrological, sediment, climate changes adaptation, etc.) in the Sava and Drina Rivers Corridors will improve the understanding of the Basin's unique characteristics and opportunities to boost regional cooperation and integrated management.

#### 1.2.3 Subprojects in Montenegro

The proposed SDIP components and sub-components that will be implemented in Montenegro are briefly described below.

Component	Sub-component	Sub-component description
Component 2: Integrated Management and Development of the Drina River Corridor	Sub-component 2.2 Integrated development of upper Drina watershed in Montenegro	This project will finance improved watershed management in the Lim and Grncar River basins of Montenegro. This activity will finance works related to flood protection, drainage and irrigation measures. The design of these investments and solutions are under preparation within the ongoing GEF-SCCF Drina project.
Component 3: Project preparation and management	Sub-component 3.1: Project preparation	Preparation of project documentation for phase II of the program, including E&S risk assessments.
	Sub-component 3.2: Institutional strengthening and project management	PIU and project management, Phase I Implementation and Operations Cost, Phase I

#### 1.2.4 Implementation arrangements for the Entire Project

SDIP will be implemented through a sequential and simultaneous multiphase programmatic approach with five participating countries: Serbia, BiH, Montenegro, Croatia, and Slovenia. Slovenia will be the only non-borrowing program beneficiary; it will participate in the regional studies, regional dialogue, capacity building tools, and related activities under Component 3. Subprojects will be implemented at national level and will have cumulative regional benefits.

SDIP will be implemented by participating countries in a coordinated manner through two levels of coordination. At the regional level, a regional committee consisting of the existing ISRBC members and senior officials from key sectors such as water, transport, energy and tourism will facilitate dialogue and cooperation in the region. This

committee will also provide strategic oversight and guidance for the implementation of regional activities in addition to national subprojects, ensuring stronger dialogue, integration and knowledge sharing. During implementation, other sectors will be coopted as and when the need arises.

At the national level, implementation will be undertaken by PIUs within line ministries of each country/entity. In each country/entity, PIUs will be established comprising of the required technical and managerial expertise to support project implementation. In Montenegro, a PIU will be established under the Ministry of Agriculture and Rural Management.

#### 1.2.5 Timeline and Budget for the Entire Project

The program will be implemented over a period of 10 years, organized in two phases. Phase I will focus on flood protection and river basin management activities in the Sava and Drina Rivers Corridors. Phase II will build on Phase I and strengthen river port connectivity and environmental management. Countries will proceed to Phase II based on the readiness of jointly identified priority interventions prepared during Phase I. The estimated program cost for both phases is US\$338 million.

#### 1.2.6 Summary of Potential Environmental and Social Impacts

Potential environmental and social impacts of the project, as identified in the ESMF based on the environmental and social assessment there under, which need to be the focus of stakeholder engagement activities, include:

- Potential impacts on landscapes and views due to construction and maintenance activities,
- Permanent and temporary acquisition of land,
- Temporary restriction to access to land,
- Labor influx and Gender based violence stemming from the influx,
- Temporary diversions and closure of routes and roads,
- Erosion and topsoil loss due to land clearing and vegetation removal and/or excavation, machinery operations, excavations of materials,
- Potential impacts on air quality due to movement of vehicles and equipment, earthworks, open piles of topsoil and spoil, and the operation of combustion engines and/or,
- Noise, dust, waste generation and traffic disturbance from construction vehicles and machinery,
- Physical or economic displacement, loss of assets, loss of livelihood and related compensation procedures,
- Generation of local income through the recruitment of workers from local communities to the project.
- The Project's added value and community benefits and support.

## 2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT IN MONTENEGRO

Montenegro has ratified a number of international treaties and conventions. One of these conventions is the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters** which has been integrated into the national legal system since 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. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of [a public authority].” In line with the Convention, Borrowers are required to:

- **Respond to requests from the public for environmental information** (any member of the public can make a request, regardless of citizenship, nationality or domicile)
- **Regularly collect and disclose environmental information to the public** and notify the public that the information is available; and provide information for emergencies.

In Montenegro (MNE), public participation is regulated by national legislation and is required for several activities such as spatial planning, environmental impact assessments and land expropriation. Table 1 below contains legal requirements for the public participation relevant for this Project.

Table 1: MNE legal requirements for the public participation relevant for this Project

Montenegro	
<i>Law on Free Access to Information<sup>1</sup></i>	<p><b>Free Access to Information</b></p> <p>This Law ensures the rights of citizens to information and stipulates that all citizens and legal entities have the right to access information in the control of a public authority, and each public authority has a corresponding obligation to disclose such information.</p>
<i>Law on Environment<sup>2</sup></i>	<p><b>Right to Information</b></p> <p>This Law states that everyone has the right to be informed about the state of the environment and to participate in the decision-making processes which could have an impact on the environment. Furthermore, it addresses the process of stakeholder engagement and disclosure, regarding environmental protection issues. Pursuant to the Law public institutions and administration bodies as well as local authorities responsible for environmental protection are obliged to inform the public about decision-making procedures in environmental matters in a timely manner, namely:</p> <ol style="list-style-type: none"> <li>1. strategic assessment of the impact of plans and programs on the environment,</li> <li>2. assessment of the environmental impact,</li> <li>3. the procedure for issuing a permit for integrated pollution prevention and control through the approval of the operation of new or existing plants, and</li> <li>4. strategies, plans, programs and other documents in the field of environmental protection.</li> </ol>
<i>Law on the Environmental Impact Assessment (EIA)<sup>3</sup></i>	<p><b>Public consultations during Environmental Impact Assessment (EIA) procedure</b></p> <p>Public consultations are foreseen during whole EIA process. This means that public consultations are foreseen within all three specific EIA procedures:</p> <ul style="list-style-type: none"> <li>▪ <b>Screening procedure:</b> The competent authority has to inform the interested authorities, organizations and public of submitted application to decide on the need to develop EIA Study within three days from the receipt of a complete application. Interested authorities, organizations, and public can submit their opinions about the submitted application to the competent authority within five working days from the receipt, or</li> </ul>

<sup>1</sup>Official Gazette of Montenegro, No. 044/12, 030/17

<sup>2</sup>Official Gazette of Montenegro, No. 52/16

<sup>3</sup>Official Gazette of Montenegro, No. 75/18

	<p>publication of the notification. The competent authority shall decide on the need for conducting EIA Study within four working days from the date of obtaining the opinions and comments from interested parties. The competent authority shall inform the interested parties (among which interested public) on the decision adopted</p> <ul style="list-style-type: none"> <li>▪ <b>Scoping procedure:</b> The competent authority has to inform the investor, interested authorities, organizations, and the public about the proposal of the content of EIA Study within five working days from the receipt of the proposal by the Commission. The interested authorities, organizations and the public may submit their opinions to the competent authority within twenty working days from the receipt of the Commission's proposal. The competent authority shall make the decision on the contents and scope of the EIA Study within five working days from the expiry of the deadline for submission of opinions, and it has to inform the interested authorities, organizations, and the public about such decision within three days from the date on which it has been passed.</li> <li>▪ <b>Review and approval of EIA Study:</b> Within five days from the receipt of the application for approval of EIA Study, the competent authority shall organize the public hearing and inform interested authorities, organizations and the public about the manner, time and venue for public disclosure, submission of opinions and remarks, as well as the time and venue for holding the public debate on EIA Study. The EIA Study has to be published on the website of the competent authority and on the e-Government portal on the day that the public hearing/consultation begins. The EIA study must be published at least 10 working days before the day of the public debate. The public hearing/consultation shall be organized and conducted by the competent authority and shall last at least 30 days from the date of notification within the public/media. The meetings are to be announced in electronic media and printed media (newspapers) which must be published in the area(s) that will be affected by the planned project. The competent authority is obliged to inform interested public on the decision on granting or rejecting the application for approval of EIA Study within five working days from the date of the decision and to publish it on its website and e-Government portal</li> </ul>
<p><i>Law on Spatial Planning and Construction</i><sup>4</sup></p>	<p><b>Public consultations for spatial planning documents</b></p> <p>Law on spatial planning and construction is proclaiming that the Ministry of Sustainable Development and Tourism (MSDT) after making a decision on the drafting of the planning document is obliged to inform the interested stakeholders about the goals and purpose of the preparation of the planning document, the possible planning solutions and the planning effects.</p> <p>MSDT is obliged to announce public hearing program once spatial plan is drafted. MSDT is obliged to publish the draft planning document on the web site within 7 days starting from the date of drafting completion. The public hearing referred to in Article 32 of this Law should be advertised in one daily printed media which shall be issued and distributed on the territory of Montenegro and on MSDT website and shall last at least 30 working days from the day of advertising.</p> <p>MSDT is obliged to submit a separate notice on the public hearing to the local self-government unit within 2 days from the day of public advertisement in one daily printed media that is issued and distributed in the territory of Montenegro. Public hearing should be organized in the form of round tables, panel discussions, presentations and submitting proposals, suggestions and comments. MSDT is obliged to prepare a report on the public hearing within 30 days from the day the public hearing ends. MSDT is providing the opinion on the report on the public hearing to the Council within 15 days from the date of submission. MSDT is obliged to publish a report on public hearing at their web page within 7 days from the date of delivery of the opinion of the Council.</p> <p>In case if there are significant differences in the planning document after the public debate a new public debate should be organized by MSDT. A new public hearing should be organized and should last at least 15 days starting from the day of publishing.</p>
<p><i>Law on the Strategic Environmental Impact Assessment (SEIA)</i><sup>5</sup></p>	<p><b>Public consultations during the issuing of construction permits</b></p> <p>According to this Law public institution responsible for preparation of the SEIA report is obliged to inform interested parties and get the opinion on SEIA report. The public institution responsible for SEIA preparation is responsible to inform interested stakeholders about the manner and deadlines related to insight into the content of the report, delivery of opinions, as well as the time and place of the public hearing. The public hearing is responsibility of the authority responsible for the preparation of the plan and program.</p> <p>Interested stakeholders and organizations are obliged to submit their opinion within 30 days from the date of SEIA submission. In case if there is no opinion provided within time framework it will be considered that there</p>

<sup>4</sup>Official Gazette of Montenegro No. 064/17, 044/18, 063/18

<sup>5</sup> Official Gazette of Montenegro No. 80/05, 40/11, 59/11, 52/16

	<p>are no remarks on SEIA.</p> <p>Public authority responsible for SEIA preparation should prepare the report on the participation of interested stakeholders and organizations that is containing their opinions as well as opinions gathered during the process of public insight and public hearing about SEIA. Responsible authority is obliged to prepare the report within 30 days upon completion of the public hearing which should contain all stakeholder opinions that are accepted nor rejected.</p>
<p>Law on Expropriation<sup>6</sup></p>	<p><b>Consultations during Expropriation Procedure</b></p> <p>This Law describes the process of expropriation. Public interest is established either through a separate law or by a decision made by the government. The proposal for determining public interest, which must include information on properties that are to be affected, the purpose of expropriation, and other information relevant to the determination of public interest, is submitted by the Project to the Government of Montenegro, through the responsible Administrative Authority (the Real Estate Directorate).</p> <p>After the adoption of the Act on the Determination of Public Interest, the proposal for expropriation is submitted to the responsible Administrative Authority - a unit in the municipality on whose territory the Project requiring expropriation is located.</p> <p>In the expropriation process the responsible Administrative Authority needs to hear from the owner of the immovable property, the facts related to the expropriation, prior to the expropriation decision. 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.</p>

<sup>6</sup> Official Gazette of Montenegro No. 55/00, 28/06, 21/08,30/17

### 3 WORLD BANK ENVIRONMENTAL AND SOCIAL STANDARD ON STAKEHOLDER ENGAGEMENT

The World Bank has, in its [Environmental and Social Framework](#) (“the Framework”) which became effective in October 2018, committed to taking the path that leads to sustainable development. The Framework specifies the mandatory requirements in the form of 10 standards that borrowers must apply.

One of those 10 standards is the [Stakeholder Engagement and Information Disclosure 10](#) (“ESS10”) which addresses stakeholder engagement. This standard recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the environmental and social sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

Objectives of ESS10 are the following:

- To establish a systematic approach to stakeholder engagement that will help Borrowers identify stakeholders and build and maintain a constructive relationship with them, in particular project-affected parties.
- To assess the level of stakeholder interest and support for the project and to enable stakeholders’ views to be taken into account in project design and environmental and social performance.
- To promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life -cycle on issues that could potentially affect them.
- To ensure that appropriate project information on environmental and social risks and impacts is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner and format.
- To provide project-affected parties with accessible and inclusive means to raise issues and grievances, and allow Borrowers to respond to and manage such grievances

According to the definition provided in the ESS10, “stakeholder” refers to individuals or groups who:

- Are affected or likely to be affected by the project (project-affected parties); and
- May have an interest in the project (other interested parties).

The standard contains a list of activities within the stakeholder engagement process which need to be implemented by the Borrowers. The stakeholder engagement will involve the following:

- stakeholder identification and analysis;
- planning how the engagement with stakeholders will take place;
- disclosure of information;
- consultation with stakeholders;
- addressing and responding to grievances; and
- reporting to stakeholders.

Under ESS10, borrowers are required to develop and implement a Stakeholder Engagement Plan (SEP) proportionate to the nature and scale of the project and its potential risks and impacts. A draft of the SEP will be disclosed as early as possible, and before project appraisal, and the Borrower will seek the views of stakeholders on the SEP, including on the identification of stakeholders and the proposals for future engagement. borrowers are required to update the SEP if significant changes are made to the SEP.

The SEP will describe the timing and methods of engagement with stakeholders throughout the life-cycle of the project as agreed between Bank and Borrowers, distinguishing between project-affected parties and other interested parties. The SEP will also describe the range and timing of information to be communicated to project-

affected parties and other interested parties, as well as the type of information to be sought from them. According to ESS10 the information will be disclosed in relevant local languages and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs.

Borrowers are required to develop within the SEP a procedure on addressing and responding to grievances (grievance mechanism to receive and facilitate resolution of PAPs concerns and grievances). Borrowers are required to implement the grievance mechanism and respond to concerns and grievances of project-affected parties related to the environmental and social performance of the project in a timely manner.

## 4 PREVIOUS STAKEHOLDER ENGAGEMENT

The Project's financial intervention is targeted towards flood protection, reconstruction of water infrastructure and facilities. The specific nature of the Project yet leaning on to completed and on-going sector interventions within the water agenda required a broad engagement with various project stakeholders and is ongoing since early 2019. The specific stakeholder engagement activities that have taken place during Project preparation include:

- 1 During the Inception and Implementation phase, in coordination with the Ministry of Agriculture and Rural Development (MARD MNE) representative, the Consultant has been able to discuss with the other related institutions, relevant for consultations on joint topics, interaction with the existing strategies and plans and obtaining the necessary data (e.g. MARD MNE, Directorate for Water Management; Water Administration; Ministry of Internal Affairs, Directorate for Emergency Management; Institute for Hydrometeorology and Seismology; Municipalities, Ministry of Sustainable Development and Tourism etc.). With the assistance of MARD MNE representatives, contacts with all the relevant institutions have been established as close cooperation and involvement of these line institutions stakeholders has been crucial for completion of preliminary design.
- 2 Site visits and analysis of collected information:
  - a. The Consultant conducted the first site visit of the Project area, with the consent and support of the MARD MNE, in the period 19-22 July 2018. During the preparation of the site visit, the Consultant was informed that the Directorate for Water was working on a report on the inspection of Grncar and Lim riverbeds in the municipalities of Gusinje, Andrijevica, Berane, and Bijelo Polje. The purpose of the report was to propose emergency measures and rehabilitation works in order to increase riverbed capacity, prevent erosion and reduce the risk of flooding in jeopardized areas. It was concluded that the information from Directorate's field investigation would be useful to the Consultant for the organization of site visit, as the Directorate had conducted it in cooperation with representatives of municipalities and local communities. The visit was conducted in presence of the representatives of the Directorate for Water and representatives of the municipalities of Gusinje, Plav, Andrijevica, Berane and Bijelo Polje. The main conclusions drawn after the insight into the existing state of the inundation of Lim and Grnčar rivers is that the existing poor condition regarding the stability of the riverbed, decreased discharge capacity of the riverbed segments and the vulnerability of surrounding areas during the rainy season, are mainly the product of following factors:
    - Lack of river training structures for management of flow regime and prevention and mitigation of floods in entire project area;
    - Exploitation of river deposits granted in accordance with current regulations has been conducted without adequate project documentation that would clearly define the obligations and constrains to the concessionaires in order to prevent riverbed degradation. Additional problem is lack of effective control and sanctioning of unauthorized works. Disposal of material with low market demand (coarse fractions produced by separation of sand) is performed arbitrarily, i.e. in a way that is most suitable to the concessionaires. It is common practice to alter the river's base flow through newly established minor bed in order to provide easier access to mechanization;
    - The project documentation is not adequate in terms of minimizing the impact on the sediment regime that results in degradation of riverbed downstream from the concession site. Quantities and type of deposits that can be taken out are generally not determined on the basis of appropriate investigations;
    - Sediment exploitation has also been carried out illegally.

- b. The second site visit was conducted with the representatives of MARD MNE in all of the municipalities included in the scope of the project (Plav, Gusinje, Andrijevica, Bijelo Polje and Berane) to present the details of the preliminary designs, at the development at a time and to discuss the list of locations selected for further development of main designs. The site visit was conducted in the period 17-18 April 2019.
  - c. The third site visit was conducted with the representatives of the World Bank, MARD MNE and the target municipalities. The objective of the site visit was to present the details of the preliminary designs to the WB representatives, and the provide overview of locations initially selected for development of main designs. The visit included municipalities Plav, Gusinje, Andrijevica and Bijelo Polje and was conducted in the period 30-31 May 2019.
- 3 High level meeting including representatives of the MARD MNE, WB, municipalities and journalists, have been organized in Bijelo Polje on 20 September 2019 to present technical solution for the locations selected for the development of main design, including 3D animations developed for selected locations in Bijelo Polje, Berane, Plav and Gusinje.
  - 4 Public engagement is performed within the EIA procedure for sub-projects in two municipalities: Municipality of Bijelo Polje and Municipality of Berane. As stipulated by the Law on EIA, MARD MNE sent to these two Municipalities a request for conducting the screening procedure in order to determine whether an EIA is required for the Sub-Projects planned to be implemented on the territory of these two Municipalities:
    - Municipality of Bijelo Polje - Sub-Project Rehabilitation of the left Lim riverbank on the area from the fire station to Limska Street: In the Municipality of Bijelo Polje, the screening procedure was performed in line with the Law on EIA. The Secretariat for Rural and Sustainable Development of the Municipality of Bijelo Polje informed the public of the screening procedure via local media and disclosed publicly the Sub-project related documentation. Sub-Project related documentation was disclosed for interested parties within the premises of the Secretariat for Rural and Sustainable Development of the Municipality of Bijelo Polje and on the website of the Municipality. During the public disclosure period none of the interested parties performed the insight of the disclosed documentation. No comments from local communities were submitted. Upon the revision of the Sub-Project related documentation and public consultation, on 6 August 2019 the Secretariat for Rural and Sustainable Development of the Municipality of Bijelo Polje adopted the decision stating that an EIA is not required for this Sub-Project.
    - Municipality of Berane - Sub-Project Regulation of the Lim River at the location of Berane-Urban area (zone): In the Municipality of Berane, the screening procedure is on-going and in line with the Law on EIA. The Secretariat for public Utilities and Housing Affairs, Traffic and Environmental Protection of the Municipality of Berane informed the public of the screening procedure via local media (newspaper) on 12 October 2019 and disclosed publicly the Sub-project related documentation. Sub-Project related documentation is disclosed for interested parties within the premises of the Secretariat for public Utilities and Housing Affairs, Traffic and Environmental Protection of the Municipality of Berane and on the website of the Municipality. The interested parties can submit their comments and opinions to the Secretariat of the Municipality by 21 October 2019. After that day the Secretariat will determine whether an EIA is required for this Sub-Project.

#### 4.1 Lessons Learned on Stakeholder Engagement from Previous Projects

Previous World Bank support has been provided in a fragmented manner to the sector and mainly at national level without transboundary effects. The World Bank has been a long-standing partner in this region contributing immensely to the knowledge and decision support agenda. There has been extensive work covering a wide range of studies and policy dialogue activities, at different levels, with the Sava and Drina riparian countries, as well as technical assistance provision in different sectors, since 2007. However, these fragmented engagements failed to create the much needed enabling platform for collaborative sustainable management and development of the shared natural resources across the basin. Project visibility matters for uptake and adaptive design. For effective implementation, project activities need to be discussed with stakeholders at preparation and launch, lessons learned during implementation of each phase need to be shared.

## 5 STAKEHOLDER IDENTIFICATION AND ANALYSIS

### 5.1 Introduction

ESS 10 recognizes two broad categories of stakeholders: 1) Project Affected Parties and 2) Other Interested parties. **Project-affected parties** include those likely to be affected by the project because of actual impacts (positive and negative) or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including direct project beneficiaries and local communities. They are the individuals or households most likely to observe/feel changes from environmental and social impacts of the project. The term **“Other interested parties”** (OIPs) refers to: individuals, groups, or organizations with an interest in the project, which may be because of the project location, its characteristics, its impacts, or matters related to public interest. For example, these parties may include regulators, government officials, the private sector, the scientific community, academics, unions, women’s organizations, other civil society organizations, and cultural groups.

### 5.2 Stakeholder Identification and Mapping

Stakeholder mapping is done vertically (across the administrative space) and horizontally (within an individual space). The first step involves universal mapping. Each stakeholder group is rated for their relative importance and influence - starting from rating from 1 to 5, the weighting derived from cross-referencing interest and power of the stakeholders. The stakeholders of high (5\*) and substantial significance (4\*) are stakeholders to be included into all engagement activities and require continuous and undisrupted engagement. This helps in assigning importance for further analysis. The universal mapping, interest and the relative importance are presented below.

Table 2: Stakeholder Segmentation by their Areas of Influence

Stakeholders	Area of Influence	Significance *****
National Level		
Ministry of Finance	Loan oversight	*****
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants	****
Ministry of Agriculture and Rural Development	Main counterpart of the WB for Project implementation	*****
Ministry for Sustainable Development and Tourism	Main authority for environmental protection and construction permitting	*****
Nature and Environmental Protection Agency	Main authority for review of EIA and environmental permitting	*****
PIU housed by the Ministry of Agriculture and Rural Development	Project management and implementation, oversight, reporting, implementation program, environmental and social risk management, grievance management, SEP implementation and coordination	*****
Ministry of Finance’s Technical Service Unit (TSU)	Procurement and financial management activities	*****
Water Administration	Main authority for water management and water permitting	*****
National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	****
Social media (Twitter,	Enables wide and regular dissemination of	****

Stakeholders	Area of Influence	Significance *****
Facebook etc.)	information related to the Project, ensures its visibility and facilitates stakeholder engagement	
<b>Local and Community Level</b>		
People affected by land acquisition	Affected by loss of assets attributable to the implementation needs of the Sub-projects	*****
People residing in the project areas	Individuals and household likely to observe changes from the environmental and social impacts of the Sub-Projects during their implementation stemming from civil works. These PAPs are likely to be affected by disturbances caused by the Project's heavy vehicles traffic, construction impacts, etc., but may also benefit from project-related employment opportunities.	*****
Local Governments (Municipalities - including line departments: land management, economic development, environment, and Local Communities)	Serve as first point of contact, conduct field outreach, disseminate project related materials, facilitate public meetings and consultations, liaison between targeted groups and MARD MNE/PIU. Administratively manage the land acquisition process. Responsible for Sub-Project GM set up, management and monitoring.	*****
Local media (radio, TV, Newspaper)	Enable wide and regular dissemination of information related to the Project to ensure its visibility, facilitate stakeholder engagement on the local level, regional and national level	*****
Education and research institutions, community organizations	Provide knowledge and research on the latest developments in the agricultural sector	***

### 5.3 Disadvantaged/ Vulnerable Individuals and Groups

Disadvantaged / vulnerable individuals or groups are potentially disproportionately affected and less able to benefit from opportunities offered by the project due to specific difficulties to access and/or understand information about the project and its environmental and social impacts and mitigation strategies. Such groups are also more likely to be excluded from the consultation process.

The project area includes villages often affected by floods in the recent past and are classified as vulnerable due to flood risks. Additional disadvantaged / vulnerable individuals or groups in the project area include “low-income households; women; youth; women-headed households; elder-headed households (≥ pension age) without any other household member bringing in income; persons with limited mobility; or persons with disabilities. Various types of barriers may influence the capacity of such groups to articulate their concerns and priorities about project impacts. For each Sub-Project a vulnerability assessment will be conducted as part of the project preparation and shall inform both the Resettlement Plan if needed and the need to adapt the engagement methods and approaches as designed in this SEP to bridge any engagement barriers stemming from vulnerability.

## 5.4 Stakeholder Analysis

The stakeholders of high and substantial significance (ranked 5\* and 4\* during universal mapping) are analyzed in the Table below. The analysis includes the current status of the stakeholder, concerns and issues raised during consultations, their expectations from the project, significance of the risk of unmet expectations and enabling conditions required to mitigate those risks. The stakeholder risk is moderate due to the need to coordinate with multiple stakeholders throughout the Project period.

Table 3: Stakeholder Analysis by the Level of Engagement

Subgroup <sup>7</sup>	Current Status	Concerns and issues	Expectations	Risks	Enabling Qualifiers
National Level					
Ministry of Finance	State budget financial management, inclusion of state guarantees, authorized persons for disbursement	Potential disbursement cap	Maintain the state guarantees, and execute the Loan Agreement as per condition of the finance contract	Moderate	Disclosure of draft budgetary documents and analysis of final docs on financial performance
World Bank	Loan Approval, Loan implementation support and monitoring of compliance to covenants and achievement of Project Development Objectives	Implementation readiness, effectiveness and disbursement delays	Meeting the timelines for Project Approval and implementation in line with goals as set forth in the Project documents.	Low	Approval of Loan, Project Operations Manual and Other project specific documents prepared by the Borrower i.e. PIU
MARD MNE/PIU	Has experience in WB projects and is experienced in implementing the WB ESF	PIU to be adequately staffed to manage large-scale projects and subprojects with ESF.	Maintain institutional capacity in implementing World Bank funded project in the flood protection and prevention sector, hiring competent staff to manage the project at all levels	Moderate	Within MARD MNE a PIU with relevant expertise in staff in project management, procurement, financial management, environmental and social safeguards, M&E, capacity building for MARD MNE/PIU throughout Project implementation
Ministry for Sustainable Development and Tourism	Experienced in construction permitting	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Nature and Environmental Protection Agency	Experienced in environmental permitting and EIA	Delays in issuing permits due to incomplete	Maintain efficiency and cooperation level during permitting and	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application

<sup>7</sup>Sub-groups at local and community level are not exclusive and may have multiple overlaps (e.g. young women agri-food producers who lives in a disadvantaged area would receive extra points in the selection criteria for all three characteristics (gender, age and location)).

Subgroup <sup>7</sup>	Current Status	Concerns and issues	Expectations	Risks	Enabling Qualifiers
	procedures	applications for permits	EIA procedures to avoid delays		for permits issuance
Water Administration	Experienced in water permitting and water management	Delays in issuing permits due to incomplete applications for permits	Maintain efficiency and cooperation level during permitting and EIA procedures to avoid delays	Moderate	Timely communicate with the PIU on the necessary documentation to be submitted within the application for permits issuance
Ministry of Finance’s Technical Service Unit (TSU)	Procurement and financial management activities housed in TSU, experience in implementing WB financed Projects	Potentially insufficient number of staff to manage multiple WB Projects	Establish and maintain excellent communication and coordination with MARD MNE/PIU and other relevant stakeholders	Moderate	Project will strengthen TSU capacity by hiring fiduciary staff as needed additional
<b>Local and Community Level</b>					
Local Governments (Municipalities - including line departments: land management, economic development, environment, and Local Communities)	Variable experience in WB projects in implementing the WB ESF	Adequate and timely response to requests for implementation of measures designed in the ESMF, SEP RPF, RP etc.	Maintain excellent communication and coordination with MARD MNE/PIU	Moderate	Timely commencement of engagement and integration into the Project processes by the MARD MNE/PIU

## 5.5 Gender Analysis, Actions and Indicators

The Projects proposed interventions will not deliver their intended economic and social returns in full unless all members of the target populations and end-user beneficiaries, irrespective of gender, can participate in the decision-making process and access improved facilities. The sub-project consultation will actively involve community members, irrespective of gender, to ensure effective public participation. At the same time, enterprise surveys have shown that women-headed businesses incur higher logistics costs than male-headed businesses. The nature of this gap as it relates to the Sava River Basin will be further explored during Phase 2 preparation, to better understand the needs and risk exposure of women-headed businesses and to promote interaction between these businesses and the river port authorities of the Sava corridor. In the Montenegro CPF for the period FY2016-20 some gender gaps have been highlighted that could be addressed commensurate to the force of the Project. Gender gaps in labor force participation are large, particularly in rural areas. Forty six percent of women aged 15+ participate in the labor force in Montenegro (2014), compared to 60 percent of men. Economic inactivity is especially high among women with primary schooling or less, ethnic minorities, and older women. Overall, women spend more time than men caring for their families and children, which reduces their opportunities to participate in the labor market in the absence of alternative childcare options<sup>8</sup>.

The Project will promote access to employment and service provision opportunities. On the objective area of supporting development of more efficient land and property markets it is noted that properties are almost invariably registered to males, making it difficult for female household members to participate in the benefit sharing and decision making related to displacement. The project Development Indicators (PDIs) include the number of people benefiting from enhanced flood protection measures disaggregated by gender.

## 5.6 Stakeholder Expansion

This Project will have prevalent number of groups of people and economically differentiated groups who are interested in the project on different levels. The Project may need to revisit the list of stakeholders and verify if there is a need to expand the list and engage with other stakeholders in course of the Project. This will be facilitated by filling out the stakeholder expansion questionnaire below at critical points during Project implementation (e.g. after first call for proposal, mid-term, substantial project design changes, etc.). A potential update will be part of the Monitoring & Evaluation (M&E) segment of the Project.

Table4:Expansion and update questionnaire

STAKEHOLDER EXPANSION AND UPDATE QUESTIONNAIRE	
<input type="checkbox"/> YES <input type="checkbox"/> NO  <i>If No the Project needs to expand the Stakeholder list</i>	Is our current list focused on relevant stakeholders who are important to our current and future efforts?  <i>(Answers should be based on knowledge of the Project, feedback received and grievances registered tackling inadequate outreach, and feedback from Extension Services and TA during their Engagement)</i>
<input type="checkbox"/> Yes <input type="checkbox"/> No  <i>If No the Needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited</i>	Do we have a good understanding of where stakeholders are coming from, what they may want, whether they would be interested in engaging with the Project, and why?  <i>(The answers should be based on the frequency of stakeholders approaching through communication channels other than the Projects, with suggestion for inclusion of groups or eligible activities etc.)</i>
<input type="checkbox"/> Yes	Does the current engagement strategy focus adequately on potential beneficiaries of the Project

<sup>8</sup>Montenegro Country Partnership Framework for the period FY2016-20, World Bank, May 24, 2016

STAKEHOLDER EXPANSION AND UPDATE QUESTIONNAIRE	
<input type="checkbox"/> No  <i>If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited</i>	from vulnerable groups?  <i>(Answers should be based on the Stakeholder engagement log relative to the gender aspects and grievances received by women focusing on insufficient inclusion and/or access to Project benefits)</i>

## 5.7 Planned Stakeholder Engagement Activities

Stakeholder engagement activities need to provide specific stakeholder groups with relevant information and opportunities to voice their views on topics that matter to them. The table below presents the stakeholder engagement activities envisaged under the project. The activity types and their frequency are adapted to the three main project stages:

1. RAP preparation, implementation and project design;
2. Construction;
3. Post-construction and Operation phase.

For a more detailed explanation of the stakeholder engagement methods to be used, please refer to the Chapter 6 of this SEP.

Table 5: Summary of proposed strategy for consultation

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
RAP, SEP, LMP and ESMP preparation and implementation; Detailed Design	<b>Project Affected Parties</b> <ul style="list-style-type: none"> <li>▪ People affected by land acquisition;</li> <li>▪ People residing in project area;</li> <li>▪ Vulnerable households</li> </ul>	<ul style="list-style-type: none"> <li>▪ Land acquisition process;</li> <li>▪ Assistance in gathering official documents for early land registration;</li> <li>▪ Compensation rates and methodology;</li> <li>▪ Project scope and rationale;</li> <li>▪ Project E&amp;S principles;</li> <li>▪ Resettlement and livelihood restoration options;</li> <li>▪ Grievance mechanism process,</li> <li>▪ Potential Labor influx stemming from construction works</li> <li>▪ Awareness raising on Gender Based Violence (GBV)</li> <li>▪ Community Health and Safety</li> <li>▪ Environmental and Social risks (other than resettlement) and mitigation measures</li> <li>▪ Labor Management Procedures (applicable to the Project) for potential job-seekers.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Public meetings, trainings/workshops, separate meetings specifically for women and vulnerable;</li> <li>▪ Mass/Social Media Communication - Facebook;</li> <li>▪ Disclosure of written information - Brochures, posters, flyers, website</li> <li>▪ Information desks - In Municipalities and PIU;</li> <li>▪ Grievance mechanism</li> <li>▪ PAP survey –Prior to completion of resettlement</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project launch meetings in municipalities;</li> <li>▪ Monthly meetings in affected municipalities and villages;</li> <li>▪ Survey of PAPs in affected villages;</li> <li>▪ Communication through mass/social media (as needed);</li> <li>▪ Information desks with brochures/posters in affected municipalities (continuous).</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>▪ Land acquisition department of Municipalities;</li> <li>▪ RAP consultant;</li> <li>▪ Municipal grievance committee.</li> </ul>
	<b>Other Interested Parties (External)</b> <ul style="list-style-type: none"> <li>▪ Municipalities</li> <li>▪ Cadaster offices</li> <li>▪ Real Estate Directorate</li> </ul>	<ul style="list-style-type: none"> <li>▪ Land acquisition process;</li> <li>▪ Registration of land plots;</li> <li>▪ Resettlement and livelihood restoration options;</li> <li>▪ Project scope, rationale and E&amp;S principles;</li> <li>▪ Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>▪ Face-to-face meetings;</li> <li>▪ Joint public/community meetings with PAPs.</li> </ul>	Weekly (as needed)	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>▪ Land acquisition department of Municipalities;</li> <li>▪ RAP consultant.</li> </ul>
	<b>Other Interested Parties (External)</b>	<ul style="list-style-type: none"> <li>▪ Land acquisition process;</li> <li>▪ Grievance mechanism process;</li> </ul>	<ul style="list-style-type: none"> <li>▪ Public meetings, trainings/workshops;</li> <li>▪ Mass/Social Media Communication - Facebook,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project launch meetings;</li> <li>▪ Monthly meetings in affected municipalities and villages;</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>▪ Land acquisition</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	<ul style="list-style-type: none"> <li>▪ Press and media;</li> <li>▪ NGOs;</li> <li>▪ Businesses and business organizations;</li> <li>▪ Workers' organizations;</li> <li>▪ Academic institutions;</li> <li>▪ National Government Ministries;</li> <li>▪ Local Government (Municipalities) Departments;</li> <li>▪ General public, tourists, jobseekers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project scope, rationale and E&amp;S principles</li> </ul>	<ul style="list-style-type: none"> <li>▪ Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>▪ Information desks - In Municipalities and PIU;</li> <li>▪ Grievance mechanism;</li> <li>▪ Project tours for media, local representatives</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communication through mass/social media (as needed);</li> <li>▪ Information desks with brochures/posters in affected municipalities (continuous)</li> </ul>	<ul style="list-style-type: none"> <li>▪ department of Municipalities.</li> </ul>
	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>▪ Other Government Departments from which permissions/clearances are required;</li> <li>▪ Other project developers reliant on or in the vicinity of the Project and their financiers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project information - scope and rationale and E&amp;S principles;</li> <li>▪ Coordination activities;</li> <li>▪ Land acquisition process;</li> <li>▪ Grievance mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Face-to-face meetings;</li> <li>▪ Invitations to public/community meetings</li> </ul>	As needed	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>▪ Land acquisition department of Municipalities.</li> </ul>
	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>▪ Other PIU Staff;</li> <li>▪ Supervision Consultants;</li> <li>▪ Contractors, sub-contractors, service providers, suppliers and their workers</li> </ul>	<ul style="list-style-type: none"> <li>▪ Project information - scope and rationale and E&amp;S principles;</li> <li>▪ Training on ESIA and other sub-management plans;</li> <li>▪ Grievance mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Face-to-face meetings;</li> <li>▪ Invitations to public/community meetings</li> </ul>	As needed	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>▪ Land acquisition department of Municipalities.</li> </ul>
Construction	<p><b>Project Affected Parties</b></p> <ul style="list-style-type: none"> <li>▪ People affected by land</li> </ul>	<ul style="list-style-type: none"> <li>▪ Land acquisition process (land registration; compensation</li> </ul>	<ul style="list-style-type: none"> <li>▪ Public meetings, trainings/workshops, separate meetings specifically for</li> </ul>	<ul style="list-style-type: none"> <li>▪ Monthly/quarterly meetings in all affected municipalities</li> </ul>	<ul style="list-style-type: none"> <li>▪ PIU (Environment &amp; Social (E&amp;S) Consultants)</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	acquisition; <ul style="list-style-type: none"> <li>People residing in project area;</li> <li>Vulnerable households</li> </ul>	rates and methodology; livelihood restoration) <ul style="list-style-type: none"> <li>Grievance mechanism process;</li> <li>Health and safety impacts (Construction-related safety measures);</li> <li>Employment opportunities;</li> <li>Environmental concerns;</li> <li>Gender Based Violence (GBV) awareness-raising.</li> </ul>	women and vulnerable; individual outreach to PAPs <ul style="list-style-type: none"> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, website</li> <li>Information desks - In Municipalities and PIU;</li> <li>Grievance mechanism</li> <li>Citizen/PAP survey - Upon completion of resettlement and/or construction</li> </ul>	and villages with ongoing construction; <ul style="list-style-type: none"> <li>Communication through mass/social media (as needed);</li> <li>Information desks with brochures/posters in affected municipalities (continuous)</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition department of Municipalities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors;</li> <li>NGOs/trainers;</li> <li>Municipal grievance committee.</li> </ul>
	<b>Other Interested Parties (External)</b> <ul style="list-style-type: none"> <li>Municipalities</li> <li>Cadaster offices</li> <li>Real Estate Directorate</li> </ul>	<ul style="list-style-type: none"> <li>Land acquisition process;</li> <li>Registration of land plots;</li> <li>Resettlement and livelihood restoration options;</li> <li>Project scope, rationale and E&amp;S principles;</li> <li>Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Joint public/community meetings with PAPs</li> </ul>	Weekly (as needed)	<ul style="list-style-type: none"> <li>PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>Land acquisition department of Municipalities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors.</li> </ul>
	<b>Other Interested Parties (External)</b> <ul style="list-style-type: none"> <li>Press and media;</li> <li>NGOs;</li> <li>Businesses and business organizations;</li> <li>Workers' organizations;</li> <li>Academic institutions;</li> <li>National Government Ministries;</li> <li>Local Government (Municipalities) Departments;</li> <li>General public, tourists, jobseekers</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope and rationale and E&amp;S principles;</li> <li>Coordination activities;</li> <li>Land acquisition process;</li> <li>Health and safety impacts;</li> <li>Employment opportunities;</li> <li>Environmental concerns;</li> <li>Grievance mechanism process.</li> </ul>	<ul style="list-style-type: none"> <li>Public meetings, trainings/workshops;</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>Information desks - In Municipalities and PIU;</li> <li>Grievance mechanism;</li> <li>Project tours for media, local representatives</li> </ul>	<ul style="list-style-type: none"> <li>Monthly/quarterly meetings in all affected municipalities with ongoing construction and headquarters;</li> <li>Communication through mass/social media (as needed);</li> <li>Information desks with brochures/posters in affected municipalities (continuous)</li> </ul>	<ul style="list-style-type: none"> <li>PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>Land acquisition department of Municipalities.</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	<p><b>Other Interested Parties (Internal)</b></p> <ul style="list-style-type: none"> <li>Other PIU Staff;</li> <li>Supervision Consultants;</li> <li>Contractor, sub-contractors, service providers, suppliers and their workers</li> </ul>	<ul style="list-style-type: none"> <li>Project information - scope, rationale and E&amp;S Principles;</li> <li>Training on ESIA and other sub-management plans;</li> <li>Grievance mechanism process</li> </ul>	<ul style="list-style-type: none"> <li>Face-to-face meetings;</li> <li>Trainings/workshops;</li> <li>Invitations to public/community meetings</li> </ul>	<ul style="list-style-type: none"> <li>As needed</li> </ul>	<ul style="list-style-type: none"> <li>PIU (Environment &amp; Social (E&amp;S) Consultants);</li> <li>Land acquisition department of Municipalities;</li> <li>Supervision and RAP consultants;</li> <li>Contractor/sub-contractors;</li> </ul>
<p><i>Post-construction and Operation phase (within life of the Project and defect liability period)</i></p>	<p><b>Project Affected Parties</b></p> <ul style="list-style-type: none"> <li>People affected by land acquisition;</li> <li>People residing in project area;</li> <li>Vulnerable households</li> </ul>	<ul style="list-style-type: none"> <li>Satisfaction with engagement activities and GRM;</li> <li>Grievance mechanism process;</li> <li>Community health and safety measures during operation phase;</li> <li>Assessing resettlement compensation and completing land transfer (for PAPs who have not yet received it, if any)</li> </ul>	<ul style="list-style-type: none"> <li>Public meetings, trainings/workshops, individual outreach to PAPs</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, website</li> <li>Information desks - In Municipalities and PIU;</li> <li>Grievance mechanism</li> <li>PAP survey - Upon completion of resettlement</li> </ul>	<ul style="list-style-type: none"> <li>Meetings in affected municipalities and villages (six-monthly);</li> <li>Survey of citizens/PAPs in affected villages;</li> <li>Communication through mass/social media (as needed);</li> <li>Information desks with brochures/posters in affected municipalities (continuous)</li> </ul>	<ul style="list-style-type: none"> <li>PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>Land acquisition department of Municipalities.</li> </ul>
	<p><b>Other Interested Parties (External)</b></p> <ul style="list-style-type: none"> <li>Press and media;</li> <li>NGOs;</li> <li>Businesses and business organizations;</li> <li>Workers' organizations;</li> <li>Academic institutions;</li> <li>National Government Ministries;</li> <li>Local Government (Municipalities) Departments;</li> <li>General public, tourists,</li> </ul>	<ul style="list-style-type: none"> <li>Grievance mechanism process;</li> <li>Community health and safety measures during operation phase.</li> </ul>	<ul style="list-style-type: none"> <li>Public meetings, trainings/workshops;</li> <li>Mass/Social Media Communication - Facebook;</li> <li>Disclosure of written information - Brochures, posters, flyers, public relations kits, website;</li> <li>Information desks - In Municipalities and PIU;</li> <li>Grievance mechanism;</li> <li>Project tours for media, local representatives.</li> </ul>	<ul style="list-style-type: none"> <li>Meetings in affected municipalities (six-monthly);</li> <li>Communication through mass/social media (as needed);</li> <li>Information desks with brochures/posters in affected municipalities (continuous)</li> </ul>	<ul style="list-style-type: none"> <li>PIU (Environment &amp; Social (E&amp;S) Consultants)</li> <li>Land acquisition department of Municipalities.</li> </ul>

Project stage	Target stakeholders	Topic(s) of engagement	Method(s) used	Location/frequency	Responsibilities
	jobseekers				

## 6 STAKEHOLDER ENGAGEMENT PROGRAM

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. The outreach and stakeholder engagement will be gender appropriate, taking into consideration the after-hour chores of women. Targeted messaging will encourage the participation of women, those living in areas with risks from flooding, and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

### 6.1 Details on Engagement Methods to Be Used

#### 6.1.1 Project Outreach Methods

At the beginning of the Project, PIU will organize project launch meetings in each of the where the Sub-Projects identified at appraisal stage are located. Such engagement will then continue whenever new Sub-Projects are agreed to be developed. The PIU will rely on the support from the respective Municipalities to help organize community meetings/sensitization sessions in all settlements throughout the Project's lifecycle. Launch meetings shall be the first step in the Sub-Project preparatory activities. The Project will include targeted outreach to women and disadvantaged groups ahead of these meetings to ensure their integration in the engagement activities.

#### 6.1.2 Mass/Social Media Communication

The PIU shall engage a social expert who shall be inter alia responsible to assist the PIU in disclosure, dissemination of information and communication with the local population. The media for communication shall be as seen fit for each community taking into consideration the type and sensitivity of stakeholders.

#### 6.1.3 Communication Materials

Written information will be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. A public relations kit will be designed specifically and distributed both in print and online form. PIU will also update its website regularly (at least on a quarterly basis) with key Project updates and reports on the Project's environmental and social performance both in English and Montenegrin. The website will also provide information about the grievance mechanism for the project (see next sub-section).

#### 6.1.4 Grievance Mechanism

In compliance with the World Bank's ESS10 requirement, a specific grievance mechanism (GM) will be set-up for the project. Dedicated communication materials (GM pamphlets, posters) will be created to help local residents familiarize themselves with the grievance redress channels and procedures. A GM guidebook/manual will also be developed and suggestion boxes installed in each affected municipality and village. In order to capture and track grievances received under the project, a dedicated GM Management Information System/database is planned. GM committees at the municipal level will benefit from training on how to receive, respond to, address and close grievances in line with best international practices. Internal GM training will also take place for Municipal and contractor staff. The PIU's website will include clear information on how feedback, questions, comments, concerns and grievances can be submitted by any stakeholder and will include the possibility to submit grievances electronically. It will also provide information on the way the GM committee works, both in terms of process and deadlines.

### 6.1.5 Information Desks

The PIU will set up at affected Municipalities Information Desks, in the premises of each affected Municipality where they can meet and share information about the project with PAPs and other stakeholders. Information Desks will provide local residents with information on stakeholder engagement activities, construction updates, contact details of the PIU. Brochures and flyers on various project related social and environmental issues will be made available at these Information Desks.

### 6.1.6 Citizen/PAP Perception Survey and Feedback

Six months after each launch meeting the PIU will conduct sample-based stakeholder satisfaction surveys to collect feedback on following:

- Engagement process and the quality and effectiveness of methods
- Level of inclusiveness in the engagement process,
- Quality of the communication and dialogue with the internal stakeholders (PIU, Contractors, GM etc.) during construction works.

The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. This will allow the PIU to identify potential design issues related to access and implementation of the matching grant program and the effectiveness of advisory services. The survey data will be disaggregated by age, gender and location. Survey results with proposed corrective measures will be published on PIU's website and discussed at consultation meetings.

### 6.1.7 Trainings and Workshops

Trainings on a variety of social and environmental issues will be provided to each contractor staff and possibly relevant local government stakeholder. Issues covered will include a sensitization to gender-based violence risks.

### 6.1.8 Proposed Strategy to Incorporate the View of Vulnerable Groups

The Project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of social specialist will help to ensure proactive outreach to all population groups. Training and awareness raising sessions will be conducted in villages rather than municipal centers to ensure higher participation of targeted population. Focus groups or individual consultation meetings dedicated specifically to vulnerable groups will be conducted to gauge their views and concerns including for Roma communities, households and individual to identify any cumulative vulnerability stemming from their alienation from the society and under integration and the impacts attributable to project also be envisaged as appropriate.

## 6.2 Information Disclosure

The websites of the Ministry of Agriculture and Rural Development(MARD MNE, or PIU) will be used (<http://www.minpolj.gov.me/ministarstvo>)and any respective local Municipality will be used to disclose project documents, including those on environmental and social performance in both local language and English. PIU will create a webpage on the Project on its existing website. All future Project related environmental and social monitoring reports, listed in the above sections will be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) will also be posted on the homepage of the MARD MNE website. An easy-to-understand guide to the terminology used in the environmental and social reports or documents will also be provided on the website. All information brochures/fliers will be posted on the website.

Details about the Project Grievance Mechanism will be posted on the website including the electronic grievance submission form will also be made available on PIU's website. Contact details of the PIU, the Contractor(s) as appointed, the Supervision Consultant as appointed, the GM will also be made available on the website. PIU will update and maintain the website regularly (at least once a quarterly basis). Further, PIU will create a dedicated project Facebook page for PAPs and other stakeholders.

### 6.3 Stakeholder Engagement Log

The PIU will maintain and disclose a Stakeholder Engagement Log (SEL) as a documented record of all stakeholder engagement activities, including group and individual meetings, planned or spontaneous meetings, formal or informal, phone conversations, written exchanges etc. Each log entry shall contain details of stakeholders engaged, date, time and place of meeting/method of communication, short description of the topics discussed, information gathered, a summary of the feedback received, if any, and a brief explanation of how the feedback was taken into account, or the reasons why it was not. The log may be supported by multimedia (photo, video) records of the meetings if available, and written documents that were discussed or issued in relations to the engagement.

The SEL will be a valuable tool providing an overview of key engagement phases, and actions within, facilitating monitoring of SEP, Sub-Project and Resettlement Plan implementation, resettlement process feedback, evaluation of empowerment of PAPs while agreeing the compensation packages as designed in the Resettlement Plan Framework and Sub-Project Specific Plans.

The SEL shall be managed by the Social Specialist of the PIU.

### 6.4 Transboundary Communication

The Higher-level Objective of the Sava and Drina Rivers Corridors Integrated Development Program (SDIP) is to facilitate integrated transboundary water resources management and development along the Sava and Drina Rivers Corridors. Governmental bodies of each country part of the riparian countries will agree and develop River basin management plan, Integrated data management system operational and provides information for decision making and agree on a Platform for transboundary collaboration established /operational.

## 7 IMPLEMENTATION ARRANGEMENTS AND INSTITUTIONAL ANALYSIS FOR STAKEHOLDER ENGAGEMENT

### 7.1 Project Enabling Efforts from Lessons Learned

The Project recognizes that the stakeholder profile is quite diverse their expectations and orientation as well as capacity to interface with the project might be different. The project design and institutional arrangements have been drawn such as to enable mitigation of social exclusion risks and come up with types of activities and approaches to address the likely impediments arising therefrom. This Project will be based on the early engagement and maintenance of dialog as a role model overall and in engagement with local communities in particular during preparation and implementation of site-specific resettlement plans.

### 7.2 Roles and Responsibilities

Stakeholder engagement will be coordinated and led by the PIU supported by the social and environmental specialist. The PIU will closely coordinate with other key stakeholders –Local Governments (line departments included), Extension Services, and local NGOs. The roles and responsibilities of these actors/stakeholders are summarized in the Table below.

*Table 6: Responsibilities of key actors/stakeholders in SEP Implementation*

STAKEHOLDER	RESPONSIBILITIES
PIU (Ministry of Agriculture and Rural Development)	<ul style="list-style-type: none"> <li>▪ Plan, implement and monitor SEP activities;</li> <li>▪ Lead and coordinate stakeholder engagement activities;</li> <li>▪ Collect stakeholder feedback through regional workshops, satisfaction surveys and bilateral meetings,</li> <li>▪ Manage the grievance mechanism at Project level, communicate grievances regularly through monitoring reports;</li> <li>▪ Build capacity of implementing partners – Local Governments and GM on Environmental and Social Framework (ESF) stakeholder engagement standard and its implications;</li> <li>▪ Manage national GM database and submit quarterly reports on the substance and quantity of grievances; and</li> <li>▪ Supervise/monitor Sub-Projects and engage with stakeholders.</li> </ul>
Local Governments	<ul style="list-style-type: none"> <li>▪ Lead stakeholder engagement activities at the municipal and community level during land acquisition and construction works;</li> <li>▪ Coordinate with the PIU on the outreach activities;</li> <li>▪ Local focal points for GM;</li> <li>▪ Administers the Grievance;</li> <li>▪ Discloses all documents, distributes outreach material as needed;</li> <li>▪ Facilitate the organization of regional stakeholder workshops to present project progress and collect feedback about project services;</li> <li>▪ Facilitate information requests and grievances by transfer to the PIU.</li> </ul>
Line departments in Cantons in Municipalities	<ul style="list-style-type: none"> <li>▪ Update spatial plans and issue permits (as required);</li> <li>▪ Respond to E&amp;S risk management requests;</li> <li>▪ Facilitate information requests and grievances by transfer to the PIU;</li> <li>▪ Discloses all documents, distributes outreach material as needed;</li> <li>▪ Administers land acquisition process.</li> </ul>

## 8 GRIEVANCE MECHANISM

Grievance includes complaints and suggestions on project implementation. Key objective of grievance mechanism is to ensure efficient manner to address grievances. The World Bank expects each project to establish such a mechanism in line with ESS10, at early stage of project development in order to be able to address specific issues in adequate and timely fashion.

The project will help improve the existing grievance mechanisms to ensure all grievances are recorded and monitored, with the aim to increase transparency and accountability, as well as to reduce risk of Project's adverse environmental and social impact.

A Project level grievance mechanism (GM) will consist of a Central Grievance Desk (CGD) administered by the PIU and Sub-Project specific Local Grievance Desks (LGD) (collectively referred to as Grievance Mechanism (GM)) established and administered by the local Governments with representatives from the key three stakeholders: PIU representative, Municipal representative and representative of the PAPs.

To ensure GM access, potential beneficiaries, communities and other stakeholders may submit grievances through channels as outlined below. The GM will provide the opportunity for continued feedback on the Sub-Projects and resolution of individual grievances during implementation. Procedures related to complaints handling will be posted on the PIU (MARD MNE) website to ensure full transparency.

The GM shall serve as both Project level information center and grievance mechanism, available to those affected by implementation of all Project sub-components and be applicable to all Project activities and relevant to all local communities affected by project activities. The GM shall be responsible for receiving and responding to grievances and comments of the following four groups:

- A person/legal entity directly affected by the project, potential beneficiaries of the Project,
- A person/legal entity directly affected by the project through land acquisition and resettlement,
- Stakeholders - people with interest in the project, and
- Residents/communities interested in and/or affected by project activities.

The Central Grievance Desk (CGD) shall be effective immediately after appraisal of the Project, in order to manage and appropriately answer complaints during its different phases while the LGD shall be effective upon decision on each new Sub-Project has been taken. In addition to the GM, legal remedies available under the national legislation are also available (courts, inspections, administrative authorities etc.).

However, the grievance mechanism for project workers required under ESS2 will be provided separately with details to be provided in the Labor Management Procedure.

MARD MNE and the Local Governments respectively are responsible for establishing functioning GM and informing stakeholders about the GM role and function, the contact persons and the procedures to submit a complaint in the affected areas. Information on the GM will be available:

- on the websites of the MARD MNE (<http://www.minpolj.gov.me/ministarstvo>),
- on the notice boards and websites of Local Governments,
- through social media campaigns.

### 8.1 Raising Grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy,

understandable and without costs to the complainant. Any grievance can be brought to the attention of the GM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. The access points and details on local entry points shall be publicized and shall be part of the awareness building once further micro locations of the Sub-Projects are known. Within the RP for the Sub-Projects details on the GM shall be provided.

## 8.2 Grievances Administration

Any grievance shall follow the path of the following mandatory steps: receive, assess and assign, acknowledge, investigate, respond, follow up and close out.

Once logged, the GM shall conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 3 days from logging it will acknowledge that the case is registered and provide the grievant with the basic next step information. It will then investigate by trying to understand the issue from the perspective of the complainant and understand what action he/she requires. The GM will investigate the facts and circumstances and articulate an answer. The final agreement should be issued and grievant be informed about the final decision not later than 30 days after the logging of the grievance. Closing out the grievance occurs after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected, the results will be documented, actions and effort put into the resolution. If the grievance could not be resolved in amicable endeavor, the grievant can resort to the formal judicial procedures, as made available under the Montenegrin legal framework. Logging a grievance with the GM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time (including during the grievance process) provided by the Montenegrin legal framework.

In case of anonymous grievance, after acknowledgment of the grievance within three days from logging, the GM will investigate the grievance and within 30 days from logging the grievance, issue the final decision that will be disclosed on the PIU's website.

The GM shall keep a grievance register log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. However, the personal data of each Grievant shall be protected under the Law on Personal Data Protection. Each grievance will be recorded in the register with the following information at minimum:

- description of grievance,
- date of receipt acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures),
- date of resolution / provision of feedback to the complainant,
- verification of implementation, and
- closure.

To avoid multiple Grievances by the same person on the same subject simply because different admission channels exist, the LGD and the CGD shall weekly exchange information on grievances received and compare the Grievance logs. The centralized log at the level of the CGD will contain notes on potentially duplicated submissions. Multiple submissions, on same events, by same grievant shall be resolved by one decision, which will be stated and the grievant appropriately informed.

## 8.3 Grievance and Beneficiary Feedback Reporting

The role of the GM, in addition to addressing grievances, shall be to keep and store comments/grievances received and keep the Central grievance log administered by the MARD MNE/PIU. In order to allow full knowledge of this

tool and its results, quarterly updates from the GM shall be available on the MARD MNE website. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

#### 8.4 Grievance Log

The PIU will maintain grievance log to ensure that each complaint has an individual reference number and is appropriately tracked and recorded actions are completed. When receiving feedback, including grievances, the following is defined:

- Type,
- Category,
- Deadline for resolving the appeal, and
- Agreed action plan.

Each complaint should be assigned with an individual reference number and is appropriately tracked and recorded actions are completed. The log should contain the following information:

- Name of the grievant, location and details of the grievance.
- Date of submission.
- Date when the Grievance Log was uploaded onto the project database.
- Details of corrective action proposed,
- Date when the proposed corrective action was sent to the complainant (if appropriate).
- Date when the grievance was closed out.
- Date when the response was sent to the grievant.

#### 8.5 Grievance Admission Channels

Any grievance can be brought to the attention of the GM by filling the grievance form in hard copy or on-line, or in any other format as chosen by the grievant. The Grievance form is provided in *Annex A. Project Grievance Form*.

Any type of grievance can be submitted by mail, fax, phone, e-mail or in person using the below access details:

*Attention: Mr. Momčilo Blagojević, General Director of Directorate for Water Management*

*Government of Montenegro, Ministry of Agriculture and Rural Development*

*Address: Rimski Trg 46, 81000 Podgorica/Montenegro*

*Tel: + 382 20 482 260, E-mail: momcilo.blagojevic@mpr.gov.me*

#### 8.6 Monitoring and Reporting on Grievances

The CGD will be responsible for:

- Collecting data from LGD serving as local admission points on the number, substance and status of complaints and uploading them into the single regional database;
- Maintaining the grievance logs on the complaints received at the regional and local level
- Monitoring outstanding issues and proposing measures to resolve them;
- Disclosing quarterly reports on GM mechanisms.

- Summarizing and analyzing the qualitative data received from the local Grievance Admission points on the number, substance and status of complaints and uploading them into the single project database;
- Monitoring outstanding issues and proposing measures to resolve them.

The monthly social monitoring reports to the WB shall be submitted through the PIU, which shall include a section related to GM which provides updated information on the following:

- Status of GM implementation (procedures, training, public awareness campaigns, budgeting etc.);
- Qualitative data on number of received grievances (applications, suggestions, complaints, requests, positive feedback) and number of resolved grievances;
- Quantitative data on the type of grievances and responses, issues provided and grievances that remain unresolved;
- Level of satisfaction by the measures (response) taken;
- Any corrective measures taken.

## 8.7 World Bank Grievance Redress System

Communities and individuals who believe that they are adversely affected by a World Bank (WB) supported project may submit complaints to existing project-level grievance redress mechanisms or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond.

For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit <http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service>.

For information on how to submit complaints to the World Bank Inspection Panel, please visit [www.inspectionpanel.org](http://www.inspectionpanel.org).

Addresses to send complaints:

Email: [grievances@worldbank.org](mailto:grievances@worldbank.org)

Fax: +1-202-614-7313

Mail address:

The World Bank Grievance Redress Service (GRS)

MSN MC 10-1018, 1818 H St NW

Washington, DC 20433, USA

## 9 SEP MONITORING AND REPORTING

The PIU will document, and communicate the progress and results of the project, including monitoring of the Stakeholder Engagement Plan. The PIU will be responsible for overall compilation of progress and results. Feedback and grievances received through the project GM will be aggregated and included in the social progress monitoring reports and other report at frequency as required by the WB.

### 9.1 Monitoring Reports during Construction

Monitoring reports documenting the environmental and social performance of the Project during construction will be prepared by the Social and Environmental specialists to be engaged by the PIU for the PIU and the World Bank. These reports will include a section regarding stakeholder engagement and grievance management. **Error! Unknown switch argument.** proposes a comprehensive set of indicators related to SEP performance at this stage. The achievement of indicators shall rely on information from the SEL.

Table 7: SEP Indicators to Be Documented in Progress Reports

ENGAGEMENT WITH PAPs
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number and location of formal meetings with PAPs
Number and location of informal meetings with PAPs
Number and location of community awareness raising or training meetings
Number and location of formal meetings with PAPs
ENGAGEMENT WITH OTHER STAKEHOLDERS
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholder (Governmental departments, municipalities, NGOs)
Minutes of meetings will be annexed to the six-monthly report
Number and nature of Project documents publicly disclosed
Number and nature of updates of the Project website
Number and categories of comments received on the website
GRIEVANCE RESOLUTION MECHANISM
Number of grievances received, in total and at the local level, at Tbilisi headquarters, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)
Number of grievances received from affected people, external stakeholders
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age and location of complainant.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Number of LGD meetings, and outputs of these meetings (minutes of meetings signed by the attendees, including the complainants to be annexed to the report)
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods
WORKERS GRIEVANCES
Number of grievances raised by workers, disaggregated by gender of workers and worksite
Number of workers grievances (i) opened, (ii) open during more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the workers, during the reporting period disaggregated by category of grievance, gender, age of workers and worksite.
Profile of those who lodge a grievance (gender, age, worksite), by category of grievances.
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints
Trend in time and comparison of number, categories, and location of complaints with previous reporting periods

The reporting on Environmental and Social activities conducted by PIU and the Supervision and ESMP and RP Monitoring will be the responsibility of the Social and Environmental Consultants during the construction phase, and will be undertaken in accordance with the requirements of the ESMP and RP.

## 9.2 Reporting Frequency

During the Project development and construction phase, the Social and Environmental Specialist will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan and include indicators as designed in Table 7. Monthly reports will be used to develop quarterly and annual reports reviewed. The quarterly and annual reports will be disclosed on the Project website and made available at the level of project affected Municipalities.

## 9.3 Involvement of Stakeholders in Monitoring Activities

The Project provides several opportunities to stakeholders, especially Project Affected Parties to monitor certain aspects of Project performance and provide feedback. LGD at the level of each affected Municipality will allow PAPs to submit grievances and other types of feedback. Citizen/PAP surveys at the project mid-point and end stages will also allow PAPs to provide feedback on project performance. Furthermore, frequent and regular community meetings and interactions with PIU staff, will allow PAPs and other local stakeholders to be heard and engaged.

## 9.4 Reporting Back to Stakeholder Groups

The PIU through the Social consultant will report back to PAPs and other stakeholder groups, primarily through public meetings in project affected Municipalities and/or Villages. Minutes of meetings will be shared during subsequent public meetings. Feedback received through the GM will be responded to in writing and verbally, to the extent possible. SMS and phone calls will be used to respond to stakeholders whose telephone numbers are available.

## 10 DISCLOSURE AND CONSULTATION

As explained in Chapter 3 on WB requirements, the WB standard on [Stakeholder Engagement and Information Disclosure 10](#) (“ESS10”) recognizes the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice. Effective stakeholder engagement can improve the E&S sustainability of projects, enhance project acceptance, and make a significant contribution to successful project design and implementation.

In line with these requirements, the set of documents that will guide the further E&S due diligence during sub-project implementation based on the 2018 WB E&S Framework including:

- this Stakeholder Engagement Plan (SEP)
- the Environmental and Social Management Framework (ESMF)
- the Environmental and Social Commitment Plan (ESCP)
- the Resettlement Policy Framework (RPF) and
- the Labor Management Plan (LMP)

was disclosed to the public on December 30, 2019 through the website of the Ministry of Agriculture and Rural Development (link: [http://www.minpolj.gov.me/rubrike/Javne\\_rasprave/219348/Poziv-an-javnu-raspravu-o.html](http://www.minpolj.gov.me/rubrike/Javne_rasprave/219348/Poziv-an-javnu-raspravu-o.html)).

On January 20, 2020, the Ministry announced that the public hearing took place on January 24, 2020 in Municipality of Bijelo Polje (link: [http://www.minpolj.gov.me/rubrike/Javne\\_rasprave/219714/Poziv-za-ucisce-na-javnu-raspravu.html](http://www.minpolj.gov.me/rubrike/Javne_rasprave/219714/Poziv-za-ucisce-na-javnu-raspravu.html)).

The minutes from the public hearing with an accompanying list of participants and photographs is included in Annex B.

This SEP has been updated to include the outcomes of the public consultation process.

## 11 ESTIMATED BUDGET

MARD MNE/PIU will be responsible for planning and implementation of stakeholder engagement activities, as well as other relevant outreach, disclosure and consultation activities. Based on the needs of the SEP, the stakeholder engagement/communication budget will cover the following activities: (i) development of communication strategy, (ii) printed outreach materials and project documents (leaflets, ads, manuals, brochures, posters, etc.). To ensure successful SEP implementation, the Project will hire an external Social Specialist to support the PIU in outreach and social performance.

## Annex A. Project Grievance Form

### SAVA AND DRINA RIVERS CORRIDORS INTEGRATED DEVELOPMENT PROJECT

#### Project Grievance Form

Designation (entered by the Project Implementation Unit)	
First name and Surname (not obligatory) <input type="checkbox"/> I would like to lodge a complaint anonymously. <input type="checkbox"/> Please do not disclose my identity without my consent.	
Contact data  Signify the desired manner of contact (by mail, by telephone, by email).	<input type="checkbox"/> By mail: <i>Provide an address for mail delivery:</i> _____ _____ <input type="checkbox"/> By telephone: _____ <input type="checkbox"/> By email: _____
Description of event to which the complaint relates	What occurred? Where did it happen? To which person did it happen? What came out as a consequence of the problem?
_____ _____ _____	
Date of the event / complaint	
	<input type="checkbox"/> Event that occurred once/complaint (date _____) <input type="checkbox"/> It occurred more than once (how many times? _____) <input type="checkbox"/> Ongoing (a problem that currently exists)
What would you want to be undertaken?	
_____ _____ _____	

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

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

*Please send this Form to the following address:*

**Attention:** Mr. Momčilo Blagojević, General Director of Directorate for Water Management  
 Government of Montenegro, Ministry of Agriculture and Rural Development  
**Address:** Rimski Trg 46, 81000 Podgorica/Montenegro  
 Tel: + 382 20 482 260, E-mail: momcilo.blagojevic@mpr.gov.me

## Annex B. Minutes from the public consultations

<b>Venue:</b>	Meeting hall of the Municipality of Bijelo Polje
<b>Date:</b>	24 January 2020
<b>Time:</b>	13:00 hr
<b>Organizer:</b>	Ministry of Agriculture and Rural Development, Directorate for Water Management, Project Implementation Unit (PIU)

The public consultation meeting for the set of documents that will guide the further E&S due diligence during sub-project implementation based on the 2018 World Bank E&S Framework was organized by the PIU from the Directorate for Water Management under the Ministry of Agriculture and Rural Development. The announcement for the review and comments on the set of documents was published at the website of the Ministry, providing relevant information to the public and all interested parties about the location of the document, in both English and local language, as well as the timeframe and the address for submitting official comments, and the time and venue of the public meeting.

The introductory note and welcome speech at the public meeting were given by the representative of the host agency Directorate for Water Management – [Mr. Momčilo Blagojević](#). Mr. Blagojević greeted the Municipality representatives, participants, representatives of the World Bank and the expert working on the mentioned documents. He provided basic information about the World Bank support and guidance in the preparation of the SDIP project, its aims and envisioned results. In addition, three components of the SDIP project and the preparatory work conducted by the expert team in the past period were presented, which resulted in the selection of sub-projects that will be implemented in Montenegro and development of all the key documents essential for the start of the SDIP project implementation. This information served as an introduction for the detailed presentation of the documents.

[Ms Irem Silajdžić](#), the E&S specialist engaged by the Ministry of Agriculture and Rural Development to work on the documents presented the main scope and results of her work. Ms Silajdžić provided relevant background information on the SDIP project and the selected sub-projects that will be implemented in Montenegro and relevant background information on the World Bank requirements. Following the introductory review, Ms Silajdžić presented each of the documents listed below:

- the Environmental and Social Management Framework (ESMF)
- the Environmental and Social Commitment Plan (ESCP)
- the Stakeholder Engagement Plan (SEP)
- the Resettlement Policy Framework (RPF)
- the Labor Management Plan (LMP)

The focus of her presentation was on the results of the E&S assessment of the known projects in Phase 1 of the SDIP and the framework procedures that will guide further implementation of each sub-project in the domains of E&S risk assessment, stakeholder engagement, resettlement and labor management. The special focus of her presentation was related to the obligations of the PIU and the role of municipalities in this process.

Following the presentation, the discussion was initiated by [Mr. Almer Mekić](#), president of the non-governmental organization (NGO) Euromost from Bijelo Polje. He stated that the NGO Euromost is leading the NGO coalition for the protection of Lim River, gathering all NGOs in the river basin, from Municipality of Plav to Municipality of Rudo. Therefore, he underlined that he speaks on behalf of all NGOs from the Lim River Basin. From the NGOs' standpoint, the most important issue is to protect the river. He praised the project stating that the citizens are well aware of the benefits, especially knowing that the flood protection infrastructure will also include walking and bicycle paths along the river that will certainly increase the quality of life for the citizens in the basin. He asked what will happen if the framework procedures are not respected during

implementation of the project as well as what are the national obligations regarding environmental impact assessments for each sub-project. He also wanted to know what is the level of development of the project documentation. He said he would appreciate to receive answers so that his NGO can communicate about the project activities to the members of the coalition as well as to concerned citizens.

**Mr. Momčilo Blagojević** from the Directorate for Water Management responded by saying that the PIU had held several meetings with all municipalities in the basin. The Ministry and the PIU are committed to implement all projects in line with the national regulations and the WB standards. The issue faced by the PIU was the low level of readiness of the spatial planning documentation. This problem interfered with the development of design documents; hence it was not possible to start the design prior to including all flood protection infrastructure in the municipal spatial planning documents. The current status of sub-projects in Bijelo Polje and Berane is that the Main Designs are finalized and the documentation is under revision. An Environmental impact assessments for these projects are to be carried out in line with the national regulations. The PIU will organize a public presentation of these projects. Mr. Blagojević also stated that all the requests from local communities have been taken into account during preliminary design. He provided the example of Municipality of Plav and the request submitted by the Fisherman Association to preserve one section of the river important from the aspect of fish breeding, based on which the design was revised.

**Mr. Igor Palandžić** from the World Bank responded regarding the question on the framework procedures. He said that all the documents presented at this meeting are legally binding for the Borrower and will be part of the contractual obligations. The World Bank has its own mechanisms to terminate the project in case of serious violation of the rules. However, he noted that the Montenegro government is committed to respecting the rules and procedures, and that no issues with implementation are expected.

**Mr. Almer Mekić** said that the NGO coalition will monitor the implementation of the SDIP sub-projects and will report to the Contractors, Municipalities and the PIU in case they discover any problems related to environmental and/or social aspects. He emphasized the importance of cooperation and communication between all stakeholders.

**Ms Bisera Alihodžić** from the Urban Department of Municipality of Bijelo Polje asked about the timing of expropriation related activities which concerns her department and about the compensation framework for privately owned property.

**Mr. Fahrudin Begović** from the Municipality of Bijelo Polje stated that the Municipality is waiting for the main design to be delivered so that they can proceed with the development of the Geodesy Study which is the input for the Expropriation Study.

**Mr. Momčilo Blagojević** from the Directorate for Water Management stated that the projects are located on public land (so called “public water assets”), and that expropriation will be avoided as much as possible. He added that everybody will be compensated in accordance with the law if any private property is identified.

**Ms Irem Silajdžić** explained the differences between national regulations and WB ESS5, mentioning all categories that are entitled to compensation. She added that it is advisable that a responsible person from the municipal department dealing with expropriation carefully reads the prepared RPF which defines the compensation framework, and incorporates these requirements during the development of the Expropriation Study according to the national regulations.

The meeting ended at 14:00.

**Photographs**



List of participants

Javna rasprava  
24.01.2020. godine  
Opština Bijelo Polje

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