MONTENEGRO

STAKEHOLDER ENGAGEMENT PLAN (SEP)

for the

Western Balkans Trade and Transport Facilitation Project Phase 2

P 173620

June 2026

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ABBREVIATIONS

CGD	Central Grievance Desk
E&S	Environmental and Social
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESS	Environmental and Social Standards
GRS	Grievance Redress Service
GM	Grievance Mechanism
GoMNE	Government of Montenegro
LGAD	Local Grievance Admission Desk
MoT	Ministry for Transport
MoF	Ministry of Finance
NGO	Non-Governmental organization
OG	Official Gazette
OHS	Occupational Health and Safety
OIP	Other Interested Parties
PIU	Project Implementation Unit
SEP	Stakeholder Engagement Plan
RPF	Resettlement Policy Framework
WB	World Bank

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GLOSSARY

Consultation: 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.

Environmental and Social Standards (ESSs): The 10 Environmental and Social Standards (ESSs) setting 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.

Project: Refers to the WBTTF supported by the World Bank and implemented by the Ministry for Transport through a Project Implementation Unit (PIU) which has been established within 30 days following the signature of the Loan Agreement for the Parent Project. The PIU currently consists of six experts: a Project Manager, Administrative Assistant, Transport Policy Expert, Trade Facilitation Specialist, Railway Specialist, and a Local Legal Expert supporting the National Single Window component. The PIU will also be supported by part-time experts: Environmental Specialist, Social Specialist, Monitoring & Evaluation (M&E) Specialist and a Legal Specialist, who are in the process of being engaged.

Final Beneficiaries: Government institutions and private-sector entities that directly benefit from the Project. These include, inter alia: (a) the Ministry of Maritime Affairs (including the Administration for Maritime Safety and Port Management); (b) the Customs Administration (CA); (c) the Border Police under the Ministry of Interior; and (d) Railway Infrastructure of Montenegro (ŽICG). In addition, beneficiaries include, but are not limited to, producers, traders, exporters, importers, and transport service providers, as well as other border management and regulatory agencies overseeing import and export procedures.

Project Affected parties include those affected or likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being, or livelihoods. These stakeholders may include individuals or groups, including local communities.

Other interested parties 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.

Stakeholders: Collective reference to individuals or groups who: (a) are affected or likely to be affected by the project (*project-affected parties*); and (b) may have an interest in the project (*other interested parties*).

Stakeholder engagement: is the continuing and iterative process by which the Borrower identifies, communicates, and facilitates a two-way dialogue with the people affected by its decisions and activities, as well as others with an interest in the implementation and outcomes of its decisions and the project. It takes into account the different access and communication needs of various groups and individuals, especially those more disadvantaged or vulnerable, including consideration of both communication and physical accessibility challenges. Engagement begins as early as possible in project preparation because early identification of and consultation with affected and interested parties allows stakeholders views and concerns to be considered in the project design, implementation, and operation.

Stakeholder engagement modality: the Project will prioritize in-person stakeholder consultations as the primary engagement modality. Online and hybrid tools will remain available as complementary, to enhance accessibility (e.g., for remote stakeholders, persons with mobility constraints, or when rapid feedback is needed) and as a contingency if in-person consultations are not feasible.

Stakeholder Engagement Plan (SEP): This updated SEP reflects the Project's Additional Financing and expanded scope. It builds on the original SEP from 2022, prepared for project appraisal of the parent project and provides the

guiding framework for preparing and implementing sub-project-specific SEPs i.e. implementation plans at Sub-projects level, ensuring timely, inclusive, and effective stakeholder engagement throughout the project lifecycle.

Implementation Plans at Sub-project level: annual consultation and communication plans assisting in effective engagement with stakeholders throughout the life of the project and specifying ground rules who, when, why and how should be receiving information, providing feedback and be meaningfully consulted.

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1. INTRODUCTION

1.1 Project Description and Context

The Government of Montenegro has received financing in the total amount of USD 15,000,000.00 (equivalent) from the World Bank (Hereinafter: The Bank) toward the costs of the "Western Balkans Trade and Transport Facilitation Phase 2" (WBTTF) project. Loan Agreement for the implementation of the WBTTF project in Montenegro was signed on February 13, 2023 and Amendment No. 1 to the Loan Agreement was signed on May 27, 2024 and its closing date is 30 April 2028.

The project aims at reducing trade costs and increase transport efficiency in the Western Balkans Six Countries. Montenegro, with one of the two gateway ports to the Western Balkans, holds a critical position for the landlocked countries of the region as well as along the TEN-T corridor and linkages to the broader European region. Given its advanced progress, towards EU membership and developed road transport infrastructure, Montenegro stands to gain significantly from efficiency gains provided by the WBTTF in the country and in neighboring countries through increased road and rail connectivity and enhanced trade integration.

On July 24, 2025, the Ministry of Finance in its letter No. 04-11-430/25-247641 requested the restructuring of the Loan No IBRD 9471-ME to accommodate additional financing in the amount of EUR 9,500,000 in grant funding from the Safe and Sustainable Transport Program (SSTP) and to incorporate changes in project activities under the Component 2: Enhancing transport efficiency and predictability, namely the Digitalization of Port of Bar and establishment of five railway level crossings along Podgorica – Bar corridor. The SSTP grant funding was approved by the SSTP Steering Committee Group to support the improvement of 24 rail level crossings on the Podgorica–Nikšić line (EUR 5.3 million) and the construction of an underpass and an alternative road to eliminate three railway crossings on the Nikšić–Podgorica line (EUR 4.2 million).

In its letter of July 29, 2025, the IBRD agreed in principle to the proposed restructuring request and informed that project changes proposed in the restructuring would take effect following a formal restructuring process by the Bank and the signing of the related legal document (a letter amending the Loan Agreement). After the restructuring is approved, the Ministry of Transport and IBRD approached to the defining and signing of the grant agreement from the SSTP.

The project is structured around the following four components:

Component 1: Facilitating movement of goods across the Western Balkans focusing on: (i) the design and implementation of a National Single Window (NSW) solution for trade and the associated reform and modernization of Customs and other border management agency requirements; (ii) Preparation of the technical designs for the building and purchase of equipment for the new customs inspection facility at the Port of Bar;

Component 2: Enhancing transport efficiency and predictability focusing on (i) the design and implementation of Port Community System; (ii) upgrade of 22 railway level crossings (RLC) and the removal of three critical crossings through the construction of an underpass and an alternative road on the Podgorica–Nikšić line, (iii) the update to existing National Transport Strategies to incorporate the Green Transport and the new EU Green Deal as well as preparation of specific transport strategies,studies and bylaws in transport sector (iv) internship and scholarship program in technical areas.

Component 3: This component will support the implementation of commitments to improve market access in services and foster regional investments.

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Component 4: This component will support project implementation unit (PIU) and provide additional technical support, including policy coordination, operating costs, and monitoring and evaluation of the project.

The ultimate leadership of the Project will be with the Ministry of Transport (MoT), and oversight of the project will be in the hands of the MoT, while the governance of the Project is also expected to include a Project Implementation Unit (PIU) housed under the MoT. The Fiduciary Arrangements are nested in the Technical Service Unit (TSU) housed under the Ministry of Finance (MoF).

The table below presents the activities approved under the originally approved Project and those introduced or modified through the restructuring process:

Activities in red font indicate cancelled activities; blue font new or revised activities, and black font unchanged activities

APPROVED PROJECT	IBRD	RESTRUCTURED PROJECT	IBRD (USD)	SSTP (EUR)	Note
Component 1: Facilitating movement of goods across the Western Balkans	5,850,000	Component 1: Facilitating movement of goods across the Western Balkans	5,857,600		
1.1. Design and Implementation of a National Single Window	4,850,000	1.1. Design and Implementation of a National Single Window	4,857,600		
1.2. Preparation of the technical designs for the building and equipment for the new customs inspection facility at the Port of Bar and procurement of related equipment	1,000,000	1.2. Preparation of the technical designs for the building and equipment for the new customs inspection facility at the Port of Bar and procurement of related equipment	1,000,000		
Component 2: Enhancing transport efficiency and predictability	8,200,000	Component 2: Enhancing transport efficiency and predictability	7,532,536		
2.1. The digitalization of the Port of Bar	4,800,000	2.1. Development of Port Community System	4,800,000		Replaced activity
2.2. The improvement of selected Railway Level Crossings (RLC) on the rail network	1,500,000	2.2.1 Construction of a Railway Underpass at the Airport Railway Station	1,000,000		Replaced activity

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APPROVED PROJECT	IBRD	RESTRUCTURED PROJECT	IBRD (USD)	SSTP (EUR)	Note
		2.2.2 Improvement of 22 rail level crossings on the Podgorica–Nikšić line		5,300,000	New activity
		2.2.3 Construction of an underpass and alternative road to eliminate three railway crossings on the Nikšić–Podgorica line		4,200,000	New activity
2.3. Preparation and update of existing National Transport Strategies and Studies	1,500,000	2.3. Preparation and update of existing National Transport Strategies and Studies	1,672,536		
2.3.1. Preparation of Study on Intermodal Transport Development	*700,000*	*2.3.1. Preparation of Study on Intermodal Transport Development*	150,000		Old activity, funds decreased
2.3.2. Update of the Transport Development Strategy	*400,000*	*2.3.2. Update of the Transport Development Strategy*	400,000		Old activity, unchanged
2.3.3. Preparation of an ITS strategy for maritime affairs	*200,000*	*2.3.3. Preparation of an ITS strategy for maritime affairs*	150,000		Old activity, funds decreased
2.3.4. Preparation of technical guidelines for the design, construction, and maintenance of roads	*200,000*	*2.3.4. Preparation of technical guidelines for the design, construction, and maintenance of roads*	200,000		Old activity, unchanged
		2.3.5. Railway Market Development and Competitiveness Study	570,000		New activity
		2.3.6. Preparation of bylaws in the field of railway and road transport	130,000		New activity
		2.3.7. Update of Transport model	40,000		New activity
		2.3.8. Rail Freight Market and Operations Analysis	32,536		New activity

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APPROVED PROJECT	IBRD	RESTRUCTURED PROJECT	IBRD (USD)	SSTP (EUR)	Note
2.4. Development of a Corridor Monitoring System	390,000	~~2.4. Development of a Corridor Monitoring System~~			Cancelled activity
2.5 Internship Program for female students and graduates in technical areas	10,000	2.4 Internship Program in technical areas	60,000		
		2.4.1. Internship Program for female students and graduates in technical areas	50,000		Old activity, Funds upgraded
		2.4.2. Scholarship program for retraining in a shortage occupation — train drivers	10,000		New activity
Component 3: Supporting the implementation of commitments to improve market access in services and foster regional investments	0	Component 3: Supporting the implementation of commitments to improve market access in services and foster regional investments	0		
Component 4: Project Implementation Support	750,000	Project Implementation Support	1,409,864		
Contingency	200,000	Contingency	200,000		
Total	15,000,000	Total	15,000,000	9,500,000	
	EUR 14,500,000		EUR 14,500,000		

Table 1 Restructuring table

Under the Component 2: Enhancing transport efficiency and predictability, the new activities were introduced as part of the restructuring as well as some changes in the activities related to sub-component Preparation and update of existing National Transport Strategies and Studies, as presented in the table above.

The development of a *Port Community System (PCS)* replaced the initially approved activity *Digitalization of the Port of Bar*. The implementation of this platform would be carried out according to the plan that is already drawn up and which foresees that the beneficiary of PCS will be the Administration for Maritime Safety and Port Management, while the role of responsible authority of the beneficiary will be assumed by the Ministry of Maritime Affairs.

The initially approved activity *Improvement of selected Railway Level Crossings (RLC) on the rail network* which aim was the establishment of five RLCs along the Podgorica–Bar corridor is replaced with the *Upgrade of 22*

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railway level crossings (RLC) and the removal of three critical crossings through the construction of an underpass and an alternative road on the Podgorica–Nikšić line which will be financed from the additional grant funding from the Safe and Sustainable Transport Program (SSTP). The additional grant funding allows the implementation of urgent railway safety improvements, which directly contribute to enhancing climate resilience, railway and road safety and sustainability in line with the Transport Community Treaty and the Sofia Declaration on Green Agenda for the Western Balkans. In addition, *the construction of a pedestrian underpass at the Aerodrom stop on the Podgorica - Bar railway line* is included in the project and will be financed from the IBRD Loan.

Based on the identified needs, new activities were introduced during the restructuring process as part of the Component 2 of the project, within sub-component Preparation and update of existing National Transport Strategies and Studies. These activities were introduced based on the reallocation of funds within the same project component. Funds were allocated from the initially approved activity *Preparation of Study on Intermodal Transport Development,* since the new cost estimation showed that the initially approved budget is much higher than needed and by cancelling the activity *Development of a Corridor Performing Monitoring System*. This activity was cancelled after consultations with the Transport Community and the Bank and it was determined that this activity is no longer relevant to be financed from the project. The following activities were introduced within the sub-component Preparation and update of existing National Transport Strategies and Studies:

- Railway Market Development and Competitiveness Study, which should comprise the Development of Marketing Strategy for the Railway Passenger Operator (ZPCG) and Study on rail market potentials and possibilities for attracting more users with special emphasis on integration with existing and future urban transport that were introduced during the restructuring process. This activity will deliver a framework to grow Montenegro's passenger rail market and strengthen its competitiveness. The objective is to (i) assess Montenegro's passenger rail market and market potential with strong integration to current and future urban transport (ITD) and (ii) develop a practical strategy and marketing framework to attract more users and improve service competitiveness of national railway passenger operator (ZPCG). It will analyze current/forecast demand, segment user groups, identify service gaps and intermodal bottlenecks, and propose priority measures for first/last-mile access and coordinated timetables. Outputs include a strategy with prioritized investment pipeline, a marketing action plan with KPIs and timelines, and proposals for potential pilot projects for service and connectivity improvements. The overall scope should cover market analysis, service/product design, intermodal integration, investment prioritization, pilot design, change management, and implementation governance. By completion, Montenegro will have a practical roadmap to increase ridership, enhance user experience, improve financial performance and advance modal shift toward greener, more sustainable mobility
- *Preparation of bylaws in the field of rail and road transport* that will strengthen the regulatory framework and institutional capacity, ensuring Montenegro's timely harmonization of its legal framework with the EU acquis and enabling more efficient, coordinated transport operations in line with international best practices.
- *Rail Freight Market and Operations Analysis (US$ 0,03 Million).* Rail Freight Market and Operations Analysis aims to analyze Montenegro's rail freight sector to boost its efficiency, market share, and sustainability. It will analyze current and projected freight flows, operational practices, and infrastructure capacity, identifying key improvements to increase rail's competitiveness for domestic and transit cargo. The expected output is a comprehensive study with recommendations and an action plan to enhance rail freight services and better integrate rail into intermodal supply chains.
- *Scholarship program for retraining in a deficit occupation — train drivers* which addresses critical skills shortages and build human capital for sustainable railway operations. Together, these activities will reinforce the project's core objectives of trade cost reduction, transport efficiency, multimodal connectivity (integrating road and rail networks), and institutional strengthening, delivering significant efficiency gains for Montenegro through enhanced rail integration and trade facilitation.

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1.2 Purpose and justification for development of a SEP

Operations and activities for which the World Bank`s Investment Project Financing (IPF) is sought after October 1, 2018, fall under the application of the Environmental and Social Framework (ESF)[1]. The ESF comprise, inter alia, the 10 Environmental and Social Standards which set out mandatory requirements for the Borrower and the Project. Under the Environmental and Social Standard 10 (ESS10) – Stakeholder Engagement, development of a Stakeholder Engagement Plan (SEP) is called for prior to Project appraisal setting out principles and procedures for stakeholder engagement in a manner consistent with ESS10.

Not all of the details of project locations, technical and technological details are known and will be decided at a future date, which is why this Stakeholder Engagement Plan (SEP) includes commitments to update the SEP with implementation plans for specific activities or group of them once these become known. This is part of an iterative process in communicating with stakeholders who may be affected by or might be interested in the Project throughout its life cycle. To allow uptake of Stakeholders concerns and problems during the project planning stage a fully functional Grievance Mechanism is established and operationalized with details provided in chapter 6.

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement throughout the project cycle:

- *Openness and life-cycle approach*: public consultations for the project(s) will be arranged during the whole life-cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation;
- *Informed participation and feedback*: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns;
- *Inclusiveness and sensitivity*: stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly and the cultural sensitivities of diverse ethnic groups.

1.3 Scope and structure of the SEP

The SEP is applicable to all activities planned under the Project. The engagement will be an integral part of the project's environmental and social performance and project design and implementation.

The document comprises 8 chapters. The first chapter serves as an Introduction. Chapter 2 provides a summary of stakeholder engagement held so far. Stakeholder Identification, Mapping and Analysis is described in Chapter 3. The Stakeholder Engagement Program is presented in Chapter 4. Implementation Arrangements for implementing the SEP are presented in Chapter 5. Description of the Project's Grievance Mechanism (GM) follows in Chapter 6. Monitoring, documentation and reporting are presented in Chapter 8.

[1] The ESF is accessible at - https://www.worldbank.org/en/projects-operations/environmental-and-social-framework. Lates accessed on November 5, 2022

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1.4 Project Locations

This project will be implemented nationwide with the specific project locations identified.

Initially defined locations of 5 Rail Level Crossings on the Bar - Podgorica rail route and interventions at Bozaj - Hani i Hotit (connecting Montenegro with Albania) are replaced with the 22 level crossings on the Podgorica–Nikšić railway line and Podgorica - Bar railway line and construction of underpasses at Pažići and Spuž with the reconstruction of access roads as well as construction of the access road along the railway from the Sekulići road crossing to the Ždrebaonik road crossing and a Pedestrian Underpass at the Airport Railway Stop on the Podgorica - Bar railway line (shown on the Figure 2 below). The list of locations of railway level crossings with photo documentation of the current state on the site is provided in Annex 5 and locations of underpasses in Pažići and Spuž, alternative road along the railway from the Sekulići road crossing to the Ždrebaonik road crossing on the Nikšić–Podgorica railway line and a Pedestrian Underpass at the Airport Railway Stop with photo documentation of the current state on site are provided in Annex 6.

Another specific location that is identified is Port of Bar, as one of the activities pertains to the construction of a facility for carrying out detailed customs control in the Free Zone Port of Bar customs terminal. The project will include the detailed designs, technical specifications, and other documents needed for putting together the bidding documents for the construction of the customs inspection facility and associated equipment inside the building. The construction of the customs inspection building and the procurement of related inspection equipment will be financed through national funds or other IFI grants. For the construction of Customs inspection facility the urban parcel LZ220 with an area of 3,088.04 m² has been allocated in the Free Zone – Port of Bar (Figure 3)

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Figure 1: The Railway network of Montenegro

Figure 2: Podgorica – Bar Railway route 1

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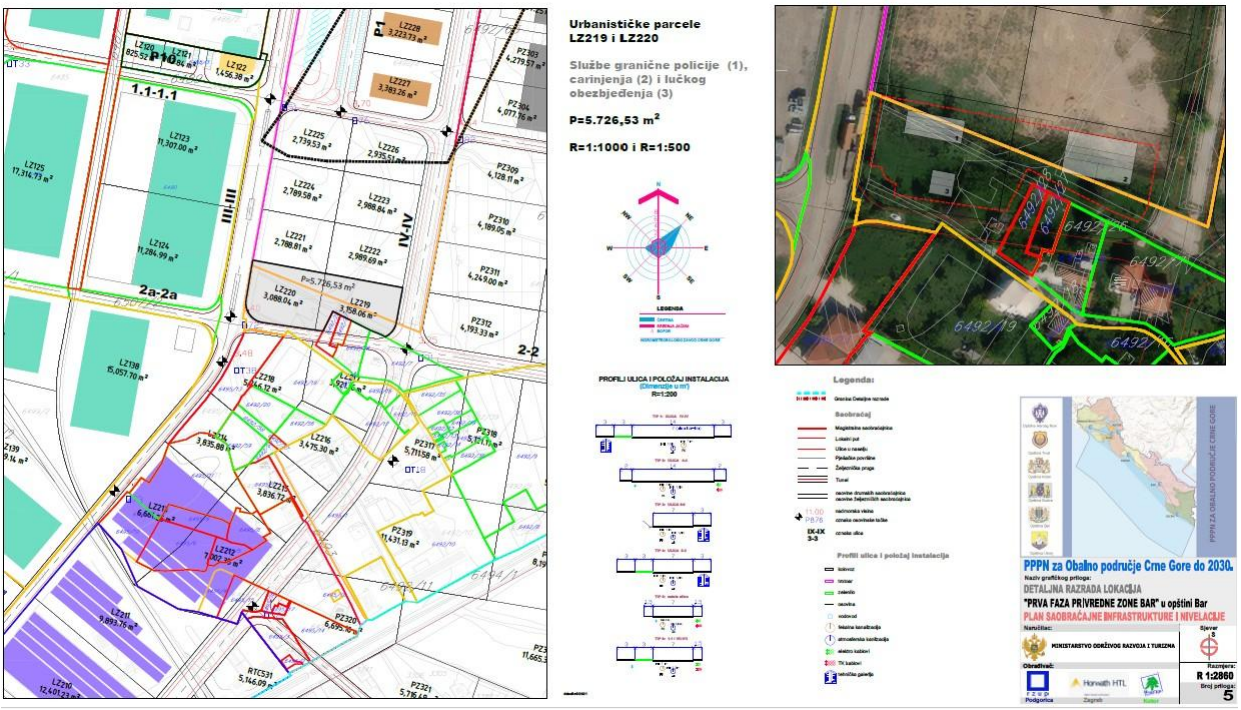

Figure 3: Location of Customs inspection facility in the Free zone Port of Bar 1

1.5 National Legislation Requirements

The commitments and requirements of the Montenegro to stakeholder and citizen engagement are not residing under a single self-standing law or regulation. However, the recognition of importance of communicating with the stakeholders is infused in the legal system and clearly recognized by mandatory procedures provided under individual laws.

The right to receive and access information related to the condition of the environment is a fundamental right granted under the Constitution of Montenegro ensuring a universal right to timely and complete information on the condition of the environment, the right to influence decisions on issues of importance for the environment and to the legal protection of these rights. Montenegro acceded to the Aarhus Convention on the 2nd November 2009, ("Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters"). A summary of the relevant policies, laws, by laws, and regulations of Montenegro, which specifically involve public consultation and disclosure on issues related to area of urban planning, construction environmental and land acquisition and resettlement and thereby attributable impacts are shown in **Error! Reference source not found.**

Other stakeholder engagement, disclosure and transparency requirements within certain topics and sectors are embedded in the applicable laws regulating each of the treated subject. They are broadly compliant to the requirements of ESS10 but have certain shortcomings when it comes to active outreach and continuous engagement strategies.

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1.6 World Bank's Environmental and Social Standard on Stakeholder Engagement (EES10)

The World Bank's ESS 10, "Stakeholder Engagement and Information Disclosure", recognizes "the importance of open and transparent engagement between the Borrower and project stakeholders as an essential element of good international practice". Specifically, the ESS10 requires the following:

- "Borrowers will engage with stakeholders throughout the project life cycle, commencing such engagement as early as possible in the project development process and in a timeframe that enables meaningful consultations with stakeholders on project design. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and impacts.
- Borrowers will engage in meaningful consultations with all stakeholders. Borrowers will provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.
- The process of stakeholder engagement will involve the following, as set out in further detail in this ESS: (i) stakeholder identification and analysis; (ii) planning how the engagement with stakeholders will take place; (iii) disclosure of information; (iv) consultation with stakeholders; (v) addressing and responding to grievances; and (vi) reporting to stakeholders.
- The Borrower will maintain and disclose as part of the environmental and social assessment, a documented record of stakeholder engagement, including a description of the stakeholders consulted, a summary of the feedback received and a brief explanation of how the feedback was taken into account, or the reasons why it was not." (World Bank, 2017: 98).

2. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

The specific nature of the Project required a broad engagement with various project stakeholders with main discussions between the World Bank and the Government, institutional and sector specific institutional Stakeholders. The specific stakeholder engagement activities that have taken place during Project preparation include:

- Numerous discussions and communication exchange between the World Bank and government agencies at the national, regional and local level;
- Discussions and engagement with Custom authorities
- Discussion and engagement with the Rail Companies
- Communication and meetings with other national and international donors working in the rail sector;
- Review of project preparation status with representatives from the Ministry of Transport including ESF Instruments;
- Multiple meetings and communication exchange with local Governments.

Ministry of Traffic (MoT) that was the lead ministry for the project at the beginning, has prepared a draft Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP) and Labor Management Procedures (LMP), for WBTTFP Project which was submitted to WB for comments and remarks during December 2022. After the World Bank gave "no objection" on draft ESF instruments, on December 16, 2022, on its web site, MoT announced invitation for Public Consultations for the public, bodies and organizations interested in ESF instruments for WBTTFP Phase 2. Same announcement is published in daily newspaper "Dan" on December 17, 2022. Public and other interested parties and organizations were invited to participate in process of public consultation on draft document, proposed project

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works and environmental and social impact of the project with presented mitigation and monitoring measures. ESF instruments and Call for Public Consultations were placed on MoT web site too, as follows: https://www.gov.me/clanak/javne-konsultacije-za-projekat-pojednostavljenja-transporta-i-trgovine-na-zapadnom-balkanu-faza-ii. Insight into the ESF document was ensured at the MoT premises, on the second floor, on working days from 11:00 AM to 01:00 PM (local time), on December 19, 2023 and December 20, 2023 in regards to the date of public announcement of this invitation. Disclosure of draft ESMF document finished on December 21, 2022, when the public meeting was held, in online format. During the public consultations, there were no comments, remarks or complaints related to issues presented, and no environmentally or socially related issues were raised and there were no other comments on the documents nor related to the future works and environmental aspect of the Project.

During the preparation and implementation phase of project activities, numerous in-person and online meetings with relevant stakeholders were held. All stakeholders had the opportunity to participate in discussions and they are encouraged to provide their feedback, comments, suggestions, or questions also by email or any other way of communication. A detailed Stakeholder Engagement log is being kept by the PIU with the Attendance lists from each meeting. The in-person meetings and the discussions are the main model of communication and engagement with the stakeholders, and online meetings are used when in-person meeting are not possible to organize or for the technical discussions when needed.

For the activities under the Component 1: Facilitating movement of goods across the Western Balkans of the Project, related to implementation of a **National Single Window** various stakeholder consultations were held.

In accordance with the obligations under the Loan Agreement, the Trade Facilitation Council, chaired by the Ministry of Finance, has taken the role of a Steering Committee responsible for providing recommendations and for guiding and monitoring the implementation of the National Single Window system in cross-border trade.

At the second session of the Trade Facilitation Council, held in March 2024, the members were informed on the status of the Western Balkans Trade and Transport Facilitation Project, in the part regarding the introduction and implementation of the National Single Window in trade. The information is publicly disclosed on the following link: https://www.gov.me/clanak/odrzana-druga-sjednica-savjeta-za-trgovinske-olaksice .

At its third session, held in October, 2024, the Trade Facilitation Council, inter alia, adopted the conclusion that it is necessary to establish a Working Group to support the implementation of Component 1 of the Project. The information is publicly disclosed on the following link: https://www.gov.me/clanak/odrzana-treca-sjednica-savjeta-za-trgovinske-olaksice.

The Working Group has been established on March 4, 2025. The Working Group has representatives of relevant stakeholders, namely, Ministry of Finance, Customs Administration, Directorate for Food Safety, Veterinary and Phytosanitary Affairs, Border Police, Ministry of Economic Development, Ministry of Public Administration, Ministry of Health, Ministry of Ecology, Sustainable Development and Northern Region Development, Ministry of Interior, Ministry of Transport, Ministry of Agriculture, Forestry and Water Management, Ministry of Culture and Media, Environmental Protection Agency, Centre for Ecotoxicological Research, Institute for Medicines and Medical Devices and Chamber of Commerce. The first meeting of the Working Group was held on April 25, 2025, in the premises of Ministry of Finance, with 15 participants present. Representatives of the Ministry of Finance chaired the meeting and informed the members of the Working Group on activities on National Single Window implementation and future activities of the Working group.

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In May 2025, the PIU held separate meetings with Customs Administration and Ministry of Transport in order to present and discuss the functional and technical recommendations for the Montenegro National Single Window (NSW) system.

Starting from September 2025, the Working Group has held three working sessions to prepare the Draft Law on the National Single Window, after which public consultations are planned for January 2026. Before public consultations, the draft Law will be shared with all relevant institutions to provide comments and suggestions before formal process of giving the opinion by the relevant ministries and institutions start. In addition, it is planned to organize the stakeholder meeting at the Chamber of Commerce, in order to present the draft Law, and to inform and engage the private sector, giving them opportunity to provide comments and feedback on the draft Law before the official public consultations start.

Following the restructuring of the Project and changes in project activities, specifically replacement of the Digitalization of Port Bar with the **Port Community System (PCS)**, on May 26 – 30, the World Bank held the technical mission on Port Community System (PCS) in order to introduce the PCS to all the relevant stakeholder. During the Mission separate meetings were held with the Ministry of Transport, Ministry of Maritime Affairs, Ministry of Finance and Customs Administration, Administration for Maritime Safety and Port Management (UPSUL), Port of Bar, Port of Adria, Chamber of Commerce, Association for Transport within the Chamber of Commerce and representatives of Transport and Trucking Operators, Railway Infrastructure of Montenegro (ZICG), Montecargo and Barska plovidba. During the separate meetings, the relevant stakeholders were introduced to the PCS and discussions were held on the future involment of each stakeholder.

On May 27, 2025, a workshop on the Port Community System (PCS) for all relevant stakeholders was held at the premises of the Ministry of Transport (Rimski Trg 46, Podgorica, second floor, Meeting Hall). The workshop focused on the strategic importance of digital transformation in the maritime sector, the development of PCS as a government priority to enhance trade competitiveness and operational efficiency, a contextual introduction to the Trade and Transport Facilitation Project (TTFP) and its relevance for the port sector, as well as the role of PCS within broader connectivity efforts. It also included an overview of the PCS concept, global benchmarks, the project structure under TTFP and the roadmap for implementation. Following the World Bank team's detailed presentation of the PCS, an open discussion was held and stakeholders provided their feedback. There were 16 participants present, from World Bank, Ministry of Transport, PIU, Ministry of Maritime Affairs, Port of Bar, Customs Administration, ZICG and Montecargo.

In regards to the stakeholder engagement for the component **Transport Development Strategy 2019-2035 (TDS)** Update, wide range of stakeholders have been involved in the process right from the inception phase.

Namely, the Inception meeting took place on September 15, 2025, in the presence of representatives of the MoT's directorates and JASPERS representatives. On September 16, 2025, individual meetings of the Consultant with relevant directorates (State Roads, Air Traffic, Railway Traffic, and Road Traffic directorates) have been organized followed by the meeting with Directorate for Capital Investments on September 22, 2025 in hybrid form.

From September 30 to October 2, 2025 a technical visit has been organized in order for the Consultant to present to the stakeholders TDS update scope and goals, and to discuss issues from their relevant sub-sectors. These meetings involved railway companies - ŽICG, Montecargo, ŽPCG and Rail Authority (September 30), Authority of Maritime Safety and Port Management, Barska Plovidba, Port of Bar, and Port of Adria (held in Bar, October 1), and Air Traffic Directorate, Airports of Montenegro, Road Traffic Directorate, Road inspection, and Ministry

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of Maritime Affairs (October 2). Also, at least two technical meeting have been organized involving TDS and transport model update Consultants, MoT and JASPERS.

Next technical visit, with another round of stakeholder meetings will be held in the first half of December 2025.

The wide stakeholder Working group (supporting the Consultant for TDS and model update) is established, although all relevant stakeholders were already involved in the process of reviewing the deliverables and data collection, even before the formal establishment of the Working group. The Working group, beside all MoT's directorates, MoMa and all relevant transport sector public companies and authorities, also involves the Ministries in charge of energy, environment, Custom Authorities, Border Police, Chamber of Commerce/private companies association, Municipalities Association, Eco Fund, Transport Community, etc.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

ESS 10, read in conjunction with ESS1, recognizes the following categories of stakeholders:

1**) Project Affected Parties**. These includes those likely to be affected by the project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, wellbeing, 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.

2) **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. The stakeholder identification has been expanding to a wider area than the project will affect, since the locations have not all been identified and important details of project activities are still under development.

3) **Disadvantaged/Vulnerable Individual or Groups.** Includes those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take advantage of a project's benefits. Such an individual/group is also more likely to be excluded from/unable to participate fully in the mainstream consultation process and as such may require specific measures and/ or assistance to do so. This will take into account considerations relating to age, including the elderly and minors, and including in circumstances where they may be separated from their family, the community or other individuals upon whom they depend.

3.1 Methodology applied to identify the area of influence

To assist with the initial identification of stakeholders, a set of 'distance' criteria has been applied to determine the directly affected parties in the area of direct and indirect influence of the project. Affected Communities are defined as being those distinguishable settlements (by law, or by name, or by recognition of local people or all three of these criteria) located within areas bounded by the area of influence.

The identification of the AoI is based on the locations of the project and related activities, and the type and location of anticipated impacts. Analysis of these factors indicates that the AoI can be considered as the combination of a series of defined areas nested within a spatial hierarchy (each area being the focus of a specific combination of impact types according to the location and type of project activities), as follows:

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- Area of direct physical footprint of any intervention on ground,
- Rail level crossing,
- The temporary construction and permanent operation phase facilities.
- Any facility with non-physical interventions.

3.2 Project Affected Parties

The Project Affected Parties of the Project are likely to extend over the following groups of stakeholders:

- Passengers on the Podgorica –Bar and Podgorica - Nikšić rail route,
- Local communities at 22 locations of the Rail Level Crossing points, and locations of underpasses, access road and pedestrian underpass,
- Companies at 22 locations of the RLCs, and locations of underpasses, access road and pedestrian underpass,
- Passenger and cargo transport users Podgorica – Bar and Podgorica – Nikšić rail route,
- Vulnerable groups.

Passengers and cargo transport users on the Podgorica – Bar rail route could potentially be affected because of the construction of the pedestrian underpass at the Airport Railway Stop that is located on this route. Passengers on the Podgorica–Bar rail route could potentially experience temporary timetable changes, slower journeys, occasional replacement transport or modified boarding/alighting arrangements due to potential speed restrictions and disruptions to train operations in the section where the pedestrian underpass at the Airport Railway Stop is being constructed.

The sub-project specific SEPs to be prepared at later stages will expand the list of projects affected parties and include for each sub-project those likely adversely by the project activities. These may also include parties affected by beneficial impacts, but the focus of engagement shall lie on drivers of the adverse impacts.

3.3 Other Interested Parties

'Other Interested Parties' constitute individuals, groups, entities that may not experience direct impacts from the project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Accordingly, there are a number of other stakeholders who have a stake, have expressed, or may express interest due to a variety of reasons. They include project implementing agencies, project partners, political institutions, service providers, civil society organizations, NGOs, political authorities, academic institutions, and project beneficiaries. It also includes staff and employees of authorities and institutions where institutional "soft" measures are being implemented, as well as users of newly introduced or upgraded services (e.g. NSW, PCS, rail services), who are priority audiences for change-management, user support, and training.

3.4 Disadvantaged or Vulnerable Individuals or Groups

Of particular importance is to understand whether adverse project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, or they are likely to be excluded/unable to access Project benefits. Such groups may often not have a voice to express their concerns or understand the impacts of a project. The SEP ensures that disadvantaged or vulnerable individuals or groups, relevant to the project, are identified, that their particular sensitivities, concerns and barriers to project information are assessed and that they fully

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understand project activities and benefits and participate in consultation processes. The vulnerability may stem from person's origin, gender, age, health condition, economic deficiency and financial insecurity, disadvantaged status in the community (e.g. minorities or fringe groups), dependence on other individuals or natural resources, etc. Engagement with the vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input to the overall process are commensurate to those of the other stakeholders.

Given the defined scope of activities, specifically, upgrades at railway level crossings including underpasses and access roads, implementation of institutional "soft" measures and digital platforms such as NSW and PCS and related activities in the field of transport and customs, and the country context, the Project anticipates the following groups and individuals that may face impacts form the project. The drivers of vulnerability will be in details assessed and identified during development of the sub-project specific SEPs. Based on the initial screening some of the identified groups may include:

- Retired elderly and people with disabilities and chronical disease;
- People with low literacy and ICT knowledge, including micro/small traders, truckers, and customs brokers who should use NSW/PCS;
- Children pedestrians using the RLCs;
- Economically marginalized and disadvantaged groups and people living below poverty line;
- Women;

3.5 Summary of stakeholder engagement needs and Analysis of their Interest and Influence

Identified stakeholder groups and their level of influence cross-referenced with their interest they may have in the project will determine the type and frequency of engagement activities necessary for each group. Using the color-coding of interest and influence matrix below will help determine where to concentrate stakeholder engagement efforts and why.

The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project and is based on the color code in the matrix below.

Table 2: Influence and interest matrix

Level of Influence				
High	**Involve/engage**	**Involve/Engage**	**Partner**	
Medium	**Inform**	**Consult**	**Consult**	
Low	**Inform**	**Inform**	**Consult**	
	Low	**Medium**	**High**	**Level of Interest**

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Table 3: Level of stakeholder engagement based on their level of interest and level of influence

Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
Local Project Affected People	Individuals	Local population along Podgorica – Bar and Podgorica – Nikšić railway line, on locations of rail level crossings points	Impacts from land acquisition (highly unlikely) during civil works, duration of civil works, traffic management plans, disruption of mobility, diversion of traffic etc.	High	Medium	Consult
		Local population whose businesses/livelihoods in and around subprojects is temporarily or permanently affected	Interest in project impact on their livelihoods and understanding the compensation procedure and additional support and assistance in restoration of living standards	High	Medium	Consult
		Passengers	Concerns about disruption of traffic, interested in alternative traveling options	High	Low	Inform
		Commuters	Avoid adverse impacts from diversion of traffic, in expectation of efficient and safe transport service	High	Low	Inform
	Communities	In the project areas along Podgorica – Bar and Podgorica – Nikšić railway line on locations of rail level crossings points	Concerns about community health and safety, traffic construction related impacts (noise, dust, damages, emissions, vibrations)	High	Medium	Consult
	Legal Entities	Private operators for freight transport	Concerns about disruption in carrying out the circle of freight transport	High	Low	Inform
	Government Agencies and institutions	Montecargo	High expectations on timely implementation to receive benefit from economic development, lower costs and time savings, safety, environmental benefits in terms of reduced	High	Medium	Consult

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Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
			GHG emissions, and possibly other positive externalities. will benefit directly from the institutional, legal and regulatory strengthening and capacity building activities			
		Railway Infrastructure of Montenegro (ŽICG)	High expectations on timely implementation to receive Benefit from economic development, lower costs and time savings, safety, environmental benefits in terms of reduced GHG emissions, and possibly other positive externalities. will benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	Medium	Consult
		Railway Transport of Montenegro (ŽPCG)	High expectations on timely implementation to receive benefits from economic development, lower costs and time savings, safety, environmental benefits in terms of reduced GHG emissions, and possibly other positive externalities. will benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	Medium	Consult
		Port of Bar	High expectations on timely implementation to receive benefits from economic development, lower costs and time savings, safety, environmental benefits in terms of reduced GHG emissions, and possibly other positive externalities. will benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	Medium	Consult
Other Interested Parties		Ministry of Finance	Loan Agreement oversight	High	High	Partner
		Ministry of Transport (MoT)	Main counterpart of the WB for Project implementation and permitting authority	High	High	Partner
		PIU hosed by MoT	Project management and implementation, oversight, reporting, financial, environmental and social risk management, grievance management, SEP implementation and coordination	High	High	Partner

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Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
Other Interested Parties	Government Agencies and institution	Ministry of Maritime Affairs	High expectations on timely implementation to receive benefits from economic development, lower costs and time savings, digitalized port/maritime processes via PCS, improved supply-chain efficiency and improved Customs–Port cooperation. Will also benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	High	Partner
		Administration of Maritime Safety and Port Management	High expectations on timely implementation to receive benefits from economic development, lower costs and time savings, digitalized port/maritime processes via PCS, improved supply-chain efficiency and improved Customs–Port cooperation. Will also benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	High	Partner
		Customs Administration	High expectations on timely implementation to receive benefits from economic development, lower costs and time savings, transparency from the NSW and development of technical documentation for the construction of new customs inspection facility in the Free Zone Port of Bar and equipment that is to be purchased for customs inspection. will also benefit directly from the institutional, legal and regulatory strengthening and capacity building activities	High	High	Partner
		Local Governments (including line departments: land management, economic development, environment)	Serve as first point of contact, conduct field outreach, facilitate two-way communication	Medium	Low	Inform
		Various Government Inspections such as	Interested in enforcement of legal requirements in all aspects of project implementation with emphasis during construction activities.	High	Medium	Consult

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Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
Other Interested Parties		Labor, Construction etc.				
		The World Bank	Interested in achievement of Project Development Objectives and compliance to E&S Standards of the Project	High	High	Partner
		Academic institutions (e.g. Faculty of transport and Traffic Engineering)	Potential concerns over regarding environmental and social impacts and project designs The project may provide a knowledge sharing avenue	Medium	Low	Inform
		Rail transport associations, NGOs	Interested in project benefits Interest in procurement and supply chain, potential environmental and social as well as community health and safety	Medium	Low	Inform
	Business entities	National and international Contractors and Engineering Consultancies	Interested in participating in various bidding procedure	High	Medium	Consult
	Media	National media (Radio, TV, Newspaper)	Enables wide and regular dissemination of information related to the Project, ensures its visibility and facilitates stakeholder engagement	Medium	Low	Inform
Vulnerable group	Individuals	Retired elderly and people with disabilities and chronical disease	Interested in accessibility, affordability of project investments and how the project will affect them, safety and mobility concerns, physical access during and after works, barrier-free design, safe navigation near RLCs and underpasses	High	Low	Consult

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Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
		People with low literacy and ICT knowledge, limited ICT access/skills (incl. micro/small traders, truckers, customs brokers using NSW/PCS)	Interested in accessibility, affordability of project investments and how the project will affect them and ability to use new digital services	Medium	Low	Inform
		Children pedestrians using the RLCs	Interested in accessibility, affordability of project investments and how the project will affect them, safety and mobility concerns, safety during construction and operation, safe routes to school/play	Medium	Low	Inform
		Economically marginalized and disadvantaged groups and people living below poverty line;	Interested in accessibility, affordability of project investments and how the project will affect them, temporary access disruptions that can cause indirect costs/time burden (e.g. if train services will be disrupted because of construction works, so there will be a need to use alternative modes of transport that could be more expensive and time consumable; cost of railway services after the project implementation)	High	Low	Consult

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Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
		Women	Interested in accessibility, affordability of project investments and how the project will affect them in personal security in and around stations, underpasses, and along temporary detour routes; in minimizing additional time burdens given caregiving/work schedules, and in prevention and response to sexual exploitation, abuse and harassment (SEA/SH)	High	Low	Consult

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3.6 Stakeholder expansion

The list of stakeholders will be revisited to verify the 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 main milestones during Project implementation but mandatory before activities under any of the project components commences. A potential update will be part of the Monitoring & Evaluation (M&E) segment of the Project.

Table 4*:* Expansion and update questionnaire

STAKEHOLDER EXPANSION AND UPDATE NEED QUESTIONNAIRE	
□ YES □ NO *If No the Project needs to expand the Stakeholder list*	Is the current list focused on relevant stakeholders who are important to our current and future efforts? (*Answers should be based on knowledge of the Project, feedback received and grievances registered tackling inadequate outreach, real or perceived exclusion and feedback during their Engagement)*
□ Yes □ No *If No the Needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited*	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? *(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.)*
□ Yes □ No *If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited*	Does the current engagement strategy adequately covers vulnerable groups? *(Answers should be based on the result of the feedback received through on-going consultations, Grievance log, and mid-term review of stakeholder engagement during project implementation)*

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4. STAKEHODLER ENGAGEMENT PROGRAM

4.1 Purpose and timing of stakeholder engagement program

The main goals of the stakeholder engagement program is to inform, disclose and consult on various project documents and activities early on to establish a dialogue with Project Stakeholders from project planning through implementation and operation. All safeguard documents prepared for the Appraisal phase of the parent Project disclosed. The updated ESMF, SEP, RPF and the ESCP were published at Railway Infrastructure of Montenegro (ŽICG's) website in May 2026 and it is available on the following link: https://www.gov.me/dokumenta/4e462fed-cd3b-41b2-9aeb-910fe04542d0. In anticipation of site specific SEPs, drafts of ESF documents updated to reflect the additional financing and restructuring of the Project (i.e. ESMF, ESCP, LMP, RPF and Project level SEP) will be publicly disclosed at least 15 days before Public Consultations on the websites of the MoT and WB. The disclosure package will include:

- Project announcements,
- Brief description of the Project,
- Description of public consultation arrangements (time, location)
- Ways of submitting comments and feedback
- Key deadlines
- The respective draft ESF documents

The final documents, with attached Minutes of the Public Consultations, with the list of stakeholders that participated and a short description of the whole process from the time of disclosure to the conclusion will be re-disclosed on the websites of MoT and WB and will be available for the whole duration of the Project.

4.2 Proposed Strategy for Disclosure

In general all documents including the ESF documents (i.e. ESMF, ESCP, LMP, RPF and Project level SEP) will be disclosed electronically at the following websites together with invitations and notices providing details to any public consultation, discussion, or meeting:

- the website of the MoT (https://www.gov.me/msa)
- the website of Railway Infrastructure of Montenegro (www.zicg.me)
- The website of Municipality Niksic (https://opstinaniksic.me/);
- The website of Municipality Danilovgrad (https://www.danilovgrad.me/)
- The website of City of Podgorica (https://www.podgorica.me/);

To ensure inclusion of wide stakeholder groups and possible constraints of digital inclusion within the Project area of influence, information that documents have been disclosed and the details of the planned public consultation, discussion, or meeting will be sent directly to the Community elected representatives – presidents of Local Communities (Mjesna Zajednica), with printed copies made available:

- In the community offices of the local affected communities – Mjesne zajednice

Notification that the Disclosure Package is available to the public and how and where it can be accessed, including an invitation to attend the public presentation and consultation meeting, will also be announced through:

- Social media campaigns; and

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- Newspaper and radio announcements.

During the disclosure period, the **Ministry of Transport**, will organise public consultations and encourage stakeholders to provide feedback. After the public consultation process is completed, a **Public Consultation Report** will be prepared and the set of ESF documents updated as necessary.

Additional efforts will be made to provide the key institutional stakeholders with electronic copies of the documents for review and feedback.

Printed copies will be made available at PIU premises.

During Project Implementation any of the documents disclosed during preparation, if updated shall be re-disclosed and public consultations held.

Site specific management instruments developed to manage environmental and social risk and impacts such as Environmental and Social Management Plans (ESMPs), Resettlement Action Plans (RAP) will be disclosed in the same manner as the ESF package.

Contractors' documents related to management of environmental and social risks (these may include traffic Management Plan, Emergency preparedness and response plans, Codes of Conduct for Employees and Contracted workers etc.) shall be made available at Contractors' websites. Information on timing of project activities and related information shall be made public via various media, newspaper and radio at least 2 weeks prior to actual execution.

During the Project development and construction phase, the Social and Environmental specialists 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 Monthly reports will be used to develop quarterly reports. The quarterly reports will be disclosed on the Project website and made available at the level of project.

4.3 Proposed Strategy for Consultation

Various stakeholder engagement activities are proposed to ensure awareness and meaningful consultations about Project activities. The main strategy is in-person engagement that establishes effective two-way communication through the Ministry of Transport (MoT) and more importantly through the Final Beneficiaries (e.g. ŽICG). Engagement will be guided and overseen by the PIU Social Specialist. The invitations will be sent to the key stakeholders identified in this SEP and the engagement of local communities will be organized through Local Community Offices (Mjesne zajednice) in order to ensure two-way dialogue, inclusive participation, and timely feedback on design, implementation, and mitigation measures.

The consultations and received comments will be registered in the Minutes of the Public Consultations, along with the list of stakeholders that participated and on line with the data protection provision, with a short description of the whole process from the time of disclosure to the conclusion. This will be included as annex to the each document consulted and will form an integral part of the final documents.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information and services and other challenges they face at home, at work places and in their communities.

At this stage of the project the PIU will organize public consultations in order to present the current project activities and activities that are added through the Additional financing and restructuring of the

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project, as well as to consult on the existing and updated ESF documents, 15 days after their disclosure. Such engagement will then continue whenever new Sub-Projects are agreed to be developed and will be integrated into the Site Specific SEPs. Site-Specific SEP Implementation Plans will be prepared and implemented, comprising six-month stakeholder engagement activities for each individual sub-project, or for groups of similar sub-projects where appropriate. The first such plan will be submitted to the World Bank for review and confirmation of its proposed scope and content.

The PIU will rely on the support from the respective Municipalities and Local Community Offices (Mjesne zajednice) to help organize community meetings sessions in all settlements throughout the project's lifecycle. The Project will include targeted outreach to women and disadvantaged groups ahead of these meetings to ensure their integration in the engagement activities.

Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

The main engagement tools are presented below by type of stakeholder engagement event and phases of the project:

Public Disclosure Meetings: Public Disclosure Meetings will be linked to the disclosure of the ESF package and associated management documents and will reflect the engagement and communication undertaken and describe the process of consultation of ESF instruments.

Public Disclosure meeting was held for the ESF instruments that were prepared for the parent project. After the World Bank gave "no objection" on draft ESF instruments, on December 16, 2022, on its web site, the invitation for Public Consultations for the public, bodies and organizations interested in ESF instruments for WBTTFP Phase 2 was announced. The same announcement was published in daily newspaper "Dan" on December 17, 2022. Public and other interested parties and organizations were invited to participate in process of public consultation on draft document, proposed project works and environmental and social impact of the project with presented mitigation and monitoring measures. ESF instruments and Call for Public Consultations were placed on MoT web site too, as follows: https://www.gov.me/clanak/javne-konsultacije-za-projekat-pojednostavljenja-transporta-i-trgovine-na-zapadnom-balkanu-faza-ii. Insight into the ESF document was ensured at the MoT premises, on the second floor, on working days from 11:00 AM to 01:00 PM (local time), on December 19, 2023 and December 20, 2023 in regards to the date of public announcement of this invitation. Disclosure of draft ESMF document finished on December 21, 2022, when the public meeting was held, in online format.

Considering the long-term nature of this project, and the previous information shared with the public, the PIU organised a set of stakeholder engagement meetings and disclosed the updated E&S documentation in May-June 2026. The stakeholder engagement process which was carried out in 2026 included a set of meetings with the local communities in the area of the railway (Danilovgrad municipality), institutional stakeholders (national and local), NGOs and business entity in the vicinity of the railway Podgorica-Niksic. Additionally, the stakeholder engagement process included informative presentations in PPT format, as well as dissemination of project information leaflets. The meetings were organised and held in cooperation with the local municipalities, i.e. Municipality Niksic and Municipality Danilovgrad. All the meetings were scheduled and attended by the MoT, ZICG, PIU, including the members of the technical assistance (environmental and social experts). The updated E&S documentation and the Project Information Leaflet are available at ŽICG website, at the following link: https://zicg.me//projekti/informacije/es-dokumenti-ttfp-projekta/pi-MjhiYwuj, as well as at the website of the Government of Montenegro, i.e. the Ministry's website at the following link:

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https://www.gov.me/pretraga?q=WBTTFP2%20&ou=81 and will be available on the local municipalities web sites.

All stakeholder engagement activities were carried out in May and June 2026, as per the following schedule: Institutional stakeholders (national institutions) 12th May 2026; Municipality Danilovgrad 19th May 2026; Municipality Niksic 19th May 2026; NGOs 27th May 2026; business entity 09th June 2026. The project E&S documentation was disclosed on 13th May 2026, whereby all the stakeholders were duly informed about the overall scope of the stakeholder engagement process, the scope and nature of E&S documentation, including the principles and rights of project affected parties defined in ESMF, LMP, SEP, RPF. The PIU and the technical assistance team provided all the information regarding the available means of communication and the recently updated Grievance Mechanism address which is going to be used as the central point of communication with the interested parties.

The already adopted ESF instruments will be re-introduced to refresh stakeholder awareness and the updated instruments that reflect the additional financing and restructuring of the Project will be presented. All documents will be made available in English and Montenegrin, on the MoT website and mirrored on the websites of ŽICG and other relevant beneficiaries, with links announced via LCO (Mjesne zajednice) channels and social media.

Presentations: All meetings will include PowerPoint presentations that aim to give attendees visual information and to summarise written disclosure documents.

Consultations with key informants. The representatives of local communities i.e. Mjesne zajednice will be the key focal point for targeted messaging and sharing information and communication material in advance key milestones of the project such as tendering of works, potential commencement of works etc. This is a locally accustomed mean of communication, with local representatives being equally well rooted in the community and the local governmental authorities.

Media advertisements and kiosk announcements: The MoT will update its website regularly (the frequency will depend on the type of information to be disseminated) with key project updates and reports on the project's environmental and social performance both in English and Montenegrin. The project will also be heavily present on social media, such as Facebook, Instagram etc. On social media, MoT would place its announcements, work progress and information and the Project itself. It is also planned to have all the national Television stations broadcast for main events. All information and documentation will be disclosed on the Project webpage once it is created, and in the meanwhile also utilize the websites of the Final Beneficiaries specifically ZICG, Municipality of Bar, the Municipality of Niksic, City of Podgorica etc.

Communication materials: Written information on the grievance mechanism, land acquisition process, cut-off date etc. 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. Suggestion boxes will also be installed for uptake of public comments and suggestions by using the Comment form in Annex 7a.

Citizen/PAP perception survey and feedback: In addition to the feedback space on the MoT website sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (MoT, Contractor, 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. The survey data will be disaggregated by age, gender and location. Survey results will be published on MoT website and discussed at consultation meetings.

Meetings with officials: Intended project implementation programme and/or PowerPoint (PPT) slide presentation will be made available. These will be used, as appropriate, depending on the stakeholders and the timing of the meetings. Materials will be available in Montenegrin versions.

Focus group, face to face, and other types of non-public meetings: Leaflet and PowerPoint slide presentation. Leaflets will be available in Montenegrin and English versions and the appropriate versions will be distributed according to stakeholder type and needs. Leaflets will be distributed at least 5 working days prior to meetings. PowerPoint presentations will be made at the beginning of meetings. Each meeting agenda will have time allocated to clarifications and questions focused on the Project.

Formal legally required meetings: Meeting related to land acquisition and resettlement. The communication shall be formal, in writing, delivered via courier, with evidence of receipt, notification periods in line with the national regulation as supplemented with the RPF and subsequent RAPs (if any). Avenues for seeking clarifications shall be provided.

4.4 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups defined in the section 3.4, have equal opportunity to access information, provide feedback, or submit grievances. The PIU Environmental & Social specialist will help to ensure proactive outreach to all population groups. Focus groups dedicated specifically to vulnerable groups will be conducted to gauge their views and concerns of the project attributable impacts.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, facilities and services supported by the project and other challenges they face at home, at work places and in their communities. Some of the strategies that will be adopted to effectively engage and communicate to vulnerable group will be towards:

- Women: ensure that community engagement teams are gender-balanced and promote women's leadership within these, design online and in-person surveys and other engagement activities so that women in unpaid care work can participate;
- Retired elderly and people with disabilities and chronical disease: provide information in accessible formats, like braille, large print; offer multiple forms of communication, such as text captioning or signed videos, text captioning for hearing impaired, online materials for people who use assistive technology.
- People with low literacy and ICT knowledge, including micro/small traders, truckers, and customs brokers who should use NSW/PCS: provide information through flyers and brochures, media and social media announcements,
- Children pedestrians using the RLCs: though educational facilities and parents conduct a safety awareness campaign for children to understand elevated risks associated with RLC while physical interventions are ongoing.

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- Economically marginalized and disadvantaged groups and people living below poverty line: outreach through trusted community intermediaries and local offices.

Based on further vulnerable groups identified during development of Site Specific SEPs and identification of particular drivers of their vulnerabilities the strategy toward engaging with vulnerable groups will be adapted accordingly.

4.5 Review of comments

During the public consultations that were conducted for the ESF documents for the Parent project, there were no comments, remarks or complaints related to issues presented, and no environmentally or socially related issues were raised and there were no other comments on the documents nor related to the future works and environmental aspect of the Project.

The comments on all disclosed data, existing ESF documents and the updated ones that will be disclosed will be reviewed immediately by the PIU E&S specialists and after the upcoming public consultations planned. Major comment will be incorporated in the final version of the ESF documents and disclosed, together with a report on the feedback, i.e. (i) list of media the announcement was disclosed, (ii) content of the announcement, (iii) time of publishing, (iv) list of received feedback.

The consultations and received comments will be registered in the Minutes of the Public Consultations, along with the list of stakeholders that participated and on line with the data protection provision, with a short description of the whole process from the time of disclosure to the conclusion. This is included as annex to the each document consulted and will form an integral part of the final documents. Meeting minutes from the stakeholder engagement process which was carried out in May and June 2026 are provided in Annex 7 of this document. Still, a general overview of the outcomes of the stakeholder engagement carried out so far is presented in this section so as to point out the main characteristics of the stakeholder's comments during this process. Namely, all the stakeholder engagement meetings were rather productive and beneficial in the sense that the stakeholders were duly informed about the planned project activities in their respective communities. The majority of concerns was raised by population from Danilovgrad settlements, as they emphasized that there is a significant number of houses in proximity to the railway line, and that special attention shall be paid to ensuring safety and security, as well as to fulfilling the requirements of the local population in regards to additional and future upgrade of the railway. The topic of safety and security was addressed by representatives of the local administration Niksic, as they emphasized the need for installation of protective fencing in pedestrian areas. They were informed that such interventions are going to be implemented at certain sections in the future. Additionally, considering the fact that the Danilovgrad section of the railway runs through a number of rural settlements, the local population proposed introducing free rail tickets during weekends, so as to encourage people to come back to their properties in the Podostrog area and engage in agriculture. The stakeholder engagement process also included consultations with NGOs, which pointed out the need for paying attention to developing infrastructure with due respect to persons with disabilities. In this context, they emphasized the need for installation of proper lighting, tactile paving, as providing accessible crossing. The project team duly informed them that integration of accessibility solutions is planned and will be implemented as part of the project.

4.6 Future Phases of Project

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and grievance mechanism. During the Project development and construction phase, the Social and

Environmental specialists 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. 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.

4.7 Development of Site Specific SEPs

Site-Specific SEP Implementation Plans will be prepared and implemented, comprising six-month stakeholder engagement activities for each individual sub-project, or for groups of similar sub-projects where appropriate. The first such plan will be submitted to the World Bank for review and confirmation of its proposed scope and content.

5. RESOURCES AND RESPONSIBILITIES FOR IMPLEMENTING STAKEHOLDER ENGAGEMENT ACTIVITIES

5.1 Resources

Detailed budgets will be further specified in the Sub-Project Specific SEPs and may include budget categories listed in table below. The SEPs will make a fair and accurate estimation on the required budget to ensure implementation of the engagement strategies.

Table 5: Tentative budget Categories for effective implementation of engagement activities

Budget categories	
1. Staff salaries and related expenses	**4. Trainings**
1a. Environnemental and Social Consultants	4a. *Training on social/environmental issues for PIU and contractor staff*
1b. *E.g. Travel costs for staff*	
2. Events	**5. Beneficiary surveys**
2a. *Project launch meetings*	5a. *perception survey*
2b. *Organization of focus groups*	**6. Grievance Mechanism**
2c. Conducting surveys	6a. *Training of GM committees*
3. Communication campaigns	6b. Constitution of local admission points
3a. *Posters, flyers*	6c. *GM communication materials*
3b. *Social media campaign*	**7. Other expenses**
3c. Workshops	7a. Travel, accommodation, etc.

5.2 Management Functions and Responsibilities

The PIU will be overall responsible for planning and implementation of stakeholder engagement activities, as well as other relevant outreach, disclosure and consultation activities, as well as for GRM functioning.

Table 6: Management functions and responsibilities

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Actor	Stakeholder engagement responsibilities
Ministry of Transport	- High level promotion of the overall Project as part of the ongoing outreach and information campaign - Promotion of Sub-project activities with relevant local self-governments - Engage with other relevant Ministries high level stakeholders
Head of PIU	- Develop a communications strategy covering the lifetime of the project - Liaise with and manage the relationship with any contracted companies producing communication materials (posters, flyers, video/TV spots…) - Plan and manage the project's communications via all media channels (social media, TV, radio, written press…)
Environmental and Social Consultants hired by PIU	- Develop a communications strategy covering the lifetime of the project - Liaise with and manage the relationship with any contracted companies producing communication materials (posters, flyers, video/TV spots…) - Plan and manage the project's communications via all media channels (social media, TV, radio, written press…) - Maintain the Stakeholder Engagement Log (SEL) - Develop the annual implementation schedule
Railway Infrastructure of Montenegro (ŽICG)	- Promotion of sub-projects activities related to the ŽICG - Use of already existing communication, stakeholder engagement and grievance mechanism channels for the purpose of the project - Receive and register any grievance voiced by project-affected parties or other interested parties and communicate them immediately to the PIU - Publish project related documentation, especially ESF documents on ŽICG website - Build and maintain constructive relationships with all stakeholder groups
Local Governments	- Build and maintain constructive relationships with all stakeholder groups in the respective municipality (business and religious leaders, community organizations…) - Identify any issue that may result in heightened concern to provide an early warning system on community issues and communicate these to the PIU - Receive and register any grievance voiced by project-affected parties or other interested parties and communicate them immediately to the PIU - Support the planning and logistics for capacity-building and communication events at local levels

To ensure successful SEP implementation, the PIU will engage a part time Environmental and Social Specialists for the duration of the Project.

6. GRIEVANCE MECHANISM

To ensure a structured approach to grievance redress under the WBTTF, a Project-level Grievance Mechanism (GM) has been established. The GM comprises a **Central Feedback Desk (CFD)**—which is already operational and managed by the PIU under MoT - and **Local Grievance Admission Desks (LGADs)** for each sub-project (collectively referred to as Grievance Mechanism). A dedicated Grievance Officer has been appointed to oversee the CFD. The LGADs will become operational at the commencement of technical design activities for the respective sub-projects and will serve as local entry points for receiving and acknowledging grievances. MoT/PIU will ensure that all stakeholders are informed about the GM, including its purpose, procedures, contact persons, and channels for submitting

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comments, concerns, or grievances in the affected areas. The administration remit will reside with the MoT and its PIU. The LGAD shall serve as local admission point for uptake of grievances and acknowledgment of grievance receipt through local avenues

The roll out of the GRM will commence with the disclosure of this SEP and the upcoming public consultations to inform stakeholders of the grievance mechanism by communicating the availability, its function, the contact persons and the procedures for submitting comments/concerns or grievances in the affected areas. External communications from stakeholders are considered to involve comments/concerns and grievances, as follows:

- Comments/concerns raised by an individual or group may, or may not, arise from a specific impact or incident that is related to a project activity. They can be positive or negative observations on general project performance and, also, can take the form of questions or requests for information; and
- A grievance is a complaint, raised by an individual or group, related to a specific impact or incident, which is considered to affect, adversely, the interests of the complainant. This includes specific concerns about compensation and relocation that are raised by displaced persons (if land acquisition is induced by the project which is highly unlikely).

Any grievance can be brought to the attention of the Grievance Mechanism verbally (personally or by telephone) or in writing by filling in the Public Grievance Form (Annex 7) (by personal delivery, post or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

Information on the GM including the Public Grievance Form, a Public Grievance Leaflet (Annex 7c) will be disclosed and made available through:

- the websites of MoT https://www.gov.me/msa
- the website of the Railway Infrastructure of Montenegro
- The notice boards (and frequently visited places) of local communities impacted by the Project – along Podgorica – Bar and Podgorica – Nikšić railway line on locations of rail level crossing points,
- Through social media campaigns.
- at local communities at the Rail Level Crossing points
- at the construction site prior to commencement of any on ground activities.

Comments/concerns will be conveyed to MoT via the same means as grievances (see section below). Once received they will enter into MoT external communication procedures and feedback will be provided according to the requirements of the procedure. Concerns will be identified and every month concerns will be analysed and a report provided to the senior ministerial level. This will alert to concerns, and acing as ‘early warning’ enable swift action to be taken to address the concerns and, thus, avoid the receipt of grievances in the future.

The grievance mechanism will consist of a Central Desk (CD) with Local Admission Desks for both affected municipalities administered by the MoT (collectively referred to as Grievance Mechanism). A separate workers’ Grievance Mechanism will be developed and operated by the Contractors in line with the LMP. The implementation of the workers’ Grievance Mechanism is to be monitored by the Supervision consultant and PIU Social Specialist.

The Grievance Mechanism is developed with the following aims:

- To build and maintain trust with all stakeholders;
- To prevent adverse consequences of failure to adequately address grievances; and
- To help identify and manage stakeholder concerns and thus support effective risk management.

The system and requirements (including staffing) for the grievance redress chain of action – from registration, sorting and processing, acknowledgement and follow-up, to verification and action, and finally feedback – are embodied in this GM. As a part of the upcoming public consultations that will present the current project activities, newly introduced activities that are subject of additional financing and restructuring of the project, as well as already existing and updated ESF instruments, the established Grievance Redress mechanism for the Project will be also presented. GM outreach campaigns, MoT will make sure that the relevant staff are fully trained and has relevant information and expertise to provide phone consultations and receive feedback. The project will utilize the existing system (line, online, written and phone complaints channels) to ensure all project-related information is disseminated and complaints and responses are disaggregated and reported.

Initially, GM would be operated manually, however, development of an IT based system is proposed to manage the entire GM. Quarterly reports in the form of Summary of complaints, types, actions taken and progress made in terms of resolving of pending issues will be prepared and disclosed (the tool for such reports is presented in **Error! Reference source not found.**). Once all possible avenues of redress h ave been proposed and if the complainant is still not satisfied then the GM would advise of their right to legal recourse.

The grievance system shall be effective as soon as practicable, in order to manage and appropriately answer complaints during its different phases. In addition to the GM, legal remedies available under the national legislation remain (courts, inspections, administrative authorities etc.) To date grievances from local communities and the public have been received during the consultation process.

Although the Project's Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) and Gender Based Violence (GBV) risk is assessed as low (because of (i) the expected local employment and (ii) expected small scale number of workers on construction sites) the GM will, on a precautionary base, be enabled to recognize SEA/SH and GBV grievances. Such grievances will be managed separately, but will use the same process value chain and timeframes described below (Grievance admission and process value chain). The necessary training for the appointed staff member who is to deal with such grievances will be provided by a WB.

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

Ministry of Transportation
To the attention of the Grievance Mechanism for the Trade and Transport Facilitation Project 2
Att. Ms Sonja Mamić
zalbenimehanizam.ttfp@msa.gov.me
Address: Rimski Trg 46,
81000 Podgorica

Details of the local access details will be disseminated as part of the grievance awareness campaign. The Grievance Procedure will be free of charge, open and accessible to all, and comments and grievances will be addressed in a non-discriminatory and transparent manner.

6.1 The Procedure

In some instances, such as when a complaint is more of a question or request for information, MoT may be able to resolve a complaint shortly after it is received. In this case, the complainant will be given the information necessary to address the issue, and the complaint will be documented and closed once the complainant is satisfied with the information offered.

When complaints are more complex and require some investigation, the following process will be used:

Step 1: Receive & Acknowledge Complaint

- Once the complaint is received, it will be recorded in a register.
- MoT will acknowledge receipt of the complaint by letter within 5 working days of receipt.
- The acknowledgement letter will specify a contact person and a description of what the complainant can expect next, including a timeline.

Step 2: Evaluate, Assign Owner, and Investigate

- MoT will assess the complaint to determine how it should be managed and, in most instances, will assign an owner with the substantive expertise to resolve it. The complaint owner will work to understand, investigate, resolve, and follow-up with the complainant. This may involve seeking information from different departments within MoT or from contractors.
- The MoT will work with the complainant to understand the cause of the issue and will need to contact the complainant during the investigation.

Step 3: Consult on and Implement Resolution

- Once the complaint has been investigated, in consultation with the complainant, the MoT will discuss the results and proposed resolution with the complainant, including a timeline for implementation.
- The MoT will implement the resolution either directly or through a third party, which will be done in consultation with the complainant.
- The MoT will review complaints regularly to ensure progress is being made towards resolution. If no progress is being made, the MoT may decide to escalate the complaint to MoT management. In such circumstances, the complainant will be updated on progress.

Step 4: Close and Monitor

- After the complaint has been fully investigated, the resolution has been implemented and monitored, and no further action is deemed necessary to resolve the issue, the MoT will close the grievance.
- In case of anonymous grievance the final decision will be disclosed on the MoT website.
- The MoT will ask the complainant to sign a statement to acknowledge resolution. Signing the statement does not preclude the complainant from raising the issue again, or seeking other avenues for redress should the resolution not result in a permanent fix or the issue recurs.
- If the complainant does not agree with the resolution offered, the MoT will close the complaint however the complainant may choose to appeal the decision to close the complaint (see Step 5) or seek other recourse.
- The MoT may re-open the complaint if the complainant provides new information.
- The MoT may contact the complainant after closure to ensure no other problems have arisen.

Step 5: Appeal (optional if complainant is not satisfied)

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- The MoT will establish an additional mechanism for community members to appeal closure of a complaint when they are not satisfied with the outcome of the investigation and/or the proposed resolution.
- A second tier panel comprised of trusted external third parties, including technical specialists familiar with the issue or higher management structures of the MoT. Generally, these people will not have had previous detailed knowledge of the complaint or engagement with the complainant.
- In some cases, the panel may choose to include one or more reputable and independent third parties on the panel.
- The panel may decide to refuse an appeal if they feel the complaint has not been presented in good faith.
- The selection of the mediator or individuals comprising the panel will be conducted in consultation with the complainant and other key stakeholders to ensure there is trust in the process.
- At any time can the aide from judicial and administrative authorities be sought without prejudice.

6.2 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. All grievances can be filled anonymously. 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.

6.3 Grievance 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 5 days from logging, it will acknowledge registration 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 business 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 national 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 Data Protection Law. 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 duplication of Grievances by the same person on the same matter, simply because different admission channels exist, the LGAD 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.

In case a grievance cannot be resolved in manner satisfactory to the complainant he/she has the right for an appeal. In such cases the resolution of the grievance will be reviewed by a commission at the level of the implementing agency (MoT). This will serve as second tier grievance level. The commission will consist of three appointed members that are not directly involved in Project implementation. The commission will acknowledge the receipt of the appeal within 3 days and issue the final decision within 5 days of the receipt of the appeal. The decision of the commission will entail a detailed explanation of the grievance resolution process as well as the explanation of the final decision and guidance on how to proceed if the outcome is still not satisfactory for the complainant.

6.4 Grievances 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 PIU. In order to allow full knowledge of this tool and its results, quarterly updates from the GM shall be available on the MoT website. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

6.5 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.

6.6 Grievance admission and process value chain

The grievance resolution process includes the following steps:

STEP 1: Submission of grievances: either orally, in writing via suggestion/complaint box, through telephone hotline/mobile, mail, SMS, social media (WhatsApp, Viber, Facebook etc.), email, website, and the LGAD. The GRM will also allow anonymous grievances to be raised and addressed. The site specific SEPs shall include details of Grievance entry points and focal points.

STEP 2: Recording of grievance, classifying the grievances based on the typology of complaints and the complainants in order to provide more efficient response, and providing the initial response immediately if possible. The typology will be based on the characteristics of the complainant (e.g., vulnerable groups, persons with disabilities, people with language barriers, etc) and also the nature of the complaint.

STEP 3: Acknowledgement of grievance within 5 days.

STEP 4: Investigating the grievance and due diligence- investigation involves gathering information about the grievance to determine its eligibility and to generate a clear picture of the circumstances surrounding the issue under consideration. This process normally includes site visits, document reviews, a meeting with the GM user (if known and willing to engage) and meetings with individuals and/ or entities who can assist with resolving the issue. Reasonable efforts will be taken to address the complaint. If the grievance is vague and not clear enough, the GM is obliged to help and provide counsel and even help in redrafting the submission, in order for the grievance/ to become clear, for purposes of an informed decision by the GM, in the best interests of persons affected by the Project. If the GM is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The decision shall give a clear assessment on the grievance/complaint, clear ruling and recommendations for fair remedy and propose measures to modify future conduct that caused the grievance as well as proposed measures to compensate if mitigation measures cannot remedy the harm or injury. The decision shall be in writing and shall be delivered to the person who filed the grievance as well as to any other person or entity to which the recommendation and measures shall apply or is under obligation by Law. The person who filed the grievance can express his/her personal satisfaction to the outcome of the grievance resolution procedure. Unilateral decision shall be an exception and resolution shall be sought through a dialogue between the GM and the Grievant,

STEP 5: Communication of the decision within 30 days.

STEP 6: Complainant Response: either grievance closure or taking further steps if the grievance remains open. Before any closure of complaints/grievances, the GM shall:

- Confirm that the required GM actions have been enforced, that the grievance resolution process has been followed and that a fair decision has been made;
- Organize meeting(s) within 10 days of being contacted by the concerned parties to discuss how to resolve the issue, if not previously conducted;
- Recommend the final decision on the mitigation measure to the complainant/aggrieved party;

- Implement the agreed mitigation measure;
- Update the Grievance Report Form and have it signed by the complainant/aggrieved party;
- Sign the Grievance Report Form and log the updated information of the grievance into the Grievance Registry; and
- Send copies of relevant documents (e.g. completed Grievance Report Form, mitigation measure, minutes of the meetings, if appropriate) to the concerned parties.

Further details on local access details LGAD will be disseminated at later stages and shall be part of the grievance mechanism awareness raising campaign.

6.7 Monitoring and reporting on Grievances

The CFD will be responsible for:

- Collecting data from LGAD 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 regular 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.

7. WORLD BANK GRIEVANCE REDRESS SERVICE

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

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8. MONITORING AND REPORTING

MoT will be responsible for preparing monitoring reports documenting the environmental and social performance of the Project and submitting them to the WB, on semi-annual basis. These shall be part of the overall progress reporting requirements as set forth in the respective Loan Agreement (to be signed). These reports will include sections dedicated to stakeholder engagement and grievance management.

The Monitoring and reporting requirements shall be structured to be completed in-house during the preparation stage. Arrangements for third party monitoring may be made either related to a specific element of a project (such as the grievance mechanism or compensation scheme) or its overall implementation during the implementation phase of the project. The Monitoring indicators are provided in **Error! Reference source not found.**.

Table 7 Monitoring Indicators

Indicator	How will it be monitored	Responsibility	Frequency
Engagement with affected parties			
Number and location of formal meetings	Minutes of Meetings	PIU's Social Specialist	Quarterly
Number and location of informal/ spontaneous meetings	Minutes of Meetings	PIU's Social Specialist	Quarterly
Number and location of community awareness raising or training meetings	Minutes of Meetings	PIU's Social Specialist	Quarterly
Number of men and women that attended each of the meetings above	List of Attendees	PIU's Social Specialist	Quarterly
For each meeting, number and nature of comments received, actions agreed during these meetings, status of those actions, and how the comments were included in the Project environmental and social management system	Minutes of Meetings	PIU's Social Specialist	Quarterly
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	PIU's Social Specialist	Quarterly
Grievance Resolution Mechanism			

Indicator	How will it be monitored	Responsibility	Frequency
Number of grievances received, in total and at the local level, on the website, disaggregated by complainant's gender and means of receipt (telephone, email, discussion)	Grievance Log	PIU's Social Specialist, Grievance Focal Point	Quarterly
Number of grievances received from affected people, external stakeholders	Grievance Log	PIU's Social Specialist, Grievance Focal Point	Quarterly
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.	Grievance Log	PIU's Social Specialist, Grievance Focal Point	Quarterly
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints	Grievance Log	PIU's Social Specialist, Grievance Focal Point	Quarterly
Number of LGD meetings, and outputs of these meetings	Minutes of meetings signed by the attendees	PIU's Social Specialist, Grievance Focal Point	Quarterly
Trends in time and comparison of number, categories, and location of complaints with previous reporting periods	Grievance Log	PIU's Social Specialist, Grievance Focal Point	Quarterly

Note: **Minutes of meetings of formal meetings and summary note of informal meetings will be annexed to the quarterly report. They will summarize the view of attendees and distinguish between comments raised by men and women**

Stakeholder engagement activities will be documented and filed in order to ensure accountable delivery of commitments made to stakeholders.

The following documentation will be used and maintained during pre-construction, construction and operation phases:

- **Stakeholder engagement log**: Used to store, analyse and report on stakeholder dialogue activities. It will be populated with details on information presented, audience questions, MoT

responses and actions, and meeting evaluation results, when appropriate. The database will also be used to track frequency of meetings over the life of the Project.

- **Commitments register**: used to keep track of the commitments made to various stakeholders.
- **Meeting minutes**: used to document meetings held ad agreements made; to be filed within the stakeholder engagement log and commitment register (as needed).
- **Stakeholder list**: ongoing updates to the list, including key contacts and contact details (telephone number, email address etc.) as additional stakeholders are identified.
- **Grievance log** will record all grievances received, management actions taken and whether it has been closed out satisfactorily.
- **Clippings:** Media monitoring of press and radio stories relevant to the Project.

Records will be reviewed on a quarterly basis to ensure that records are being used and maintained. Commitments and actions recorded during community interaction activities will also be regularly reviewed to ensure they are taken forward.

8.1 Reporting back to stakeholder groups

Periodic summaries and internal reports on public grievances, enquiries and related incidents, together with the status of implementation of associated corrective/preventative actions will be collated by responsible staff and referred to the senior management of the PIU. The summaries will provide a mechanism for assessing both the number and the nature of complaints and requests for information, along with the Project's ability to address those in a timely and effective manner. Information on public engagement activities undertaken by the Project during the year may be conveyed to the stakeholders in the following possible ways:

- Publication of a standalone annual report on project's interaction with the stakeholders.
- Adopt software solutions to scale up the two-way interaction and feedback, by using survey platforms, preferable using one dashboard to make it easy to measure and understand the feedback (any platform in use and central governmental MoT level, or alternatively /in addition (as required) SurveyMonkey or alternative online platform can be applied), in order to meet citizens' expectations for change created by their engagement, use their input to facilitate improved development outcomes;

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ANNEX 1 : KEY LAWS GUIDING AND MANDATING STAKEHOLDER ENGAGEMENT IN MONTENEGRO

Issue	Laws of reference	Summary of Stakeholder Engagement Requirements
Preparation of project documentation and related strategic studies	The Law on Spatial Planning ("Official Gazette of Montenegro", No. 19/25 dated 04.03.2025) and Law on Construction of Structures ("Official Gazette of Montenegro", No. 19/25 dated 04.03.2025) and related sectoral laws and secondary legislation	The Law on Spatial Planning and Law on Construction of Structures define the process of adoption of the planning documents for construction of facilities (spatial plans) and preparation of designs and technical documentation for construction and obtaining all necessary permits. In this adoption process, there is a procedure of public inquiry. It envisages disclosure, consultations and grievance mechanism prior to adoption of general spatial plans, detailed spatial plans and urbanistic plans.
Land acquisition (expropriation)	The Law on Expropriation (Official Gazette No. 055/00, changes 012/02, 028/06, 021/08, 030/17, 75/18, 33/24 and 53/25)	The Law defines expropriation as dispossession or limitation of the ownership right on immovable assets (defined as land, buildings and other structures, including perennial plants, crops, logging forest etc.) based on determined public interest, with fair compensation. This Law defines the stakeholder participation and appeals in the process of expropriation.
Environmental issues, EIA and Environmental Permits	The Law on Strategic Environmental Assessment (Official Gazette 080/05, 059/11 and 052/16)	The Law on Strategic Environmental Assessment includes provisions that a special strategic assessment shall be carried out for all projects when there is a possibility that their implementation shall cause significant impacts on the environment, such as "complex engineering facilities" (defined by The Law on Spatial Planning and Construction), including highways, bridges, tunnels etc. It includes specific requirements for construction design, plan and licensing and requirement to prepare elaborated Strategic environmental assessment document (SEA), which is subject to mandatory public inquiry.
	Law on nature protection (Official Gazette 054/16, 018/19 and 84/24)	The Law on nature protection defines general provisions on nature protection objectives conservation of biodiversity and sustainable management of living natural resources.

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Issue	Laws of reference	Summary of Stakeholder Engagement Requirements
	Law on environment (Official Gazette 052/16)	The Law on Environment generally defines obligations of all legal or natural person while performing its activities, to provide environmental protection, including sustainable use of natural resources, goods and energy, introducing more energy efficient technologies and using renewable natural resources, using products, processes, technologies that are less endangering the environment, taking measures to prevent and eliminate the consequences of endangerment and damage to life, control of the activities and operation of installations that may pose a risk or cause, danger to the environment and human health etc. It also provides the possibility for inclusion of legal entities and entrepreneurs in the environmental management, control system and disclosure to the public of impacts of certain activities on the environment, (EMAS system) in accordance with the standard MEST EN ISO 14001.
Cultural heritage issues	Law on the protection of cultural heritage (Official Gazette 052/16, 044/17 and 018/19)	The Law on the protection of cultural heritage defines its objectives as protection of cultural heritage as preservation and improvement, ensuring the sustainable use of cultural heritage, according to their traditional and appropriate uses, The Project planning documents must be harmonized with the study of the protection of cultural assets and management plan and subject to prior consent of the proper authority defined by the Law.
Public information	Law on Free Access to Information (Official Gazette 044/12 and 030/17)	The law regulates the right of public to know information which are in possession of state authorities: (legislative, executive, judicial, administrative) authority of local self-government, local government bodies, institutions, business and other legal entities if its mainly financed from public revenues, as well as natural person, entrepreneur or a legal entity that exercises public authority or manages a public fund. According to this Law every domestic and foreign natural and legal entity has the right to access information, without obligation to state the reasons and explain the interest of seeking information.

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ANNEX 2 : COMMUNITY GRIEVANCE REGISTER, TRACKING REPORT AND GENERIC DASHBOARDS GENERATED

COMMUNITY GRIEVANCE STATUS TRACKING REPORT

DASHBOARD STATUS AS OF: Thursday, September 8, 2022

Average Response Time	
Target Resolution Timeframe (days)	**30**
% Satisfied with Process	**100%**
% Satisfied with Outcome	**100%**
Reponse Target (Days)	**30 days**
Average Duration to Response	
Average Duration to Closure	

Status Report	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Open cases at beginning of month												
New cases this month												
Cases closed this month												
Open cases at end of month												
Average time between receipt and closing out of complaints												
% of closed cases that were closed on time												
% of complainants that were satisfied with the **process**												
% of complainants that were satisfied with the **outcome**												

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ANNEX 3: PUBLIC GRIEVANCE REGISTRATION FORM

GRIEVANCE FORM –	
INFORMATION ABOUT THE PERSON SUBMITTING THE GRIEVANCE	
Reference no.	
Full Name Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent	First name _____ Last name _____ □ I wish to raise my grievance anonymously □ I request not to disclose my identity without my consent
Contact Information: Please mark how you would like to be contacted (mail, phone, e-mail)	□ By Post: Please provide mailing address: _____ □ By Telephone: _____ □ By E-mail _____ □ I don't wish to be contacted and will follow up on the resolution on the MoT website
Preferred Language for communication	□ Montenegrin □ Other please specify
Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/ Grievance	□ One time incident/grievance (date _____) □ Happened more than once (how many times? _____) □ On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature: _____ (not required in case of anonymous complaints) **Date: _____**	
Please return this form to: Ministry of Transport To the attention of the CGD Address: Rimski Trg 46, 81100 Podgorica	

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ANNEX 4: PUBLIC GRIEVANCE LEAFLET

MoT is striving to ensure that the implementation of the Trade and Transport Facilitation Project, will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. However, should there be any issues we would like to hear about your concerns that you may have in relation to Project activities.

What kind of grievance can be lodged?

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

- Increased noise, access issues or other nuisances during construction works or operation;
- Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- Concerns about the environment;
- Concerns related to land acquisition and resettlement
- Practices that endanger the health, safety and security of employees working on the Project;
- Inadequate implementation of the Project's Stakeholder Engagement Plan
- And any other related to impacts stemming from development of this Project

How to file a grievance?

Anyone can lodge a grievance to MoT (contact details are provided below) or the contractor free of charge in via the following ways:

- verbally (in person or by phone)
- in writing by filling in the attached Project Grievance Form (or in a different form if you wish), and filing such grievance (by hand delivery, mail, fax or e-mail)

Contact details:

Ministry of Transport

To the attention of the Grievance Mechanism for the Trade and Transport Facilitation Project

Sonja Mamić

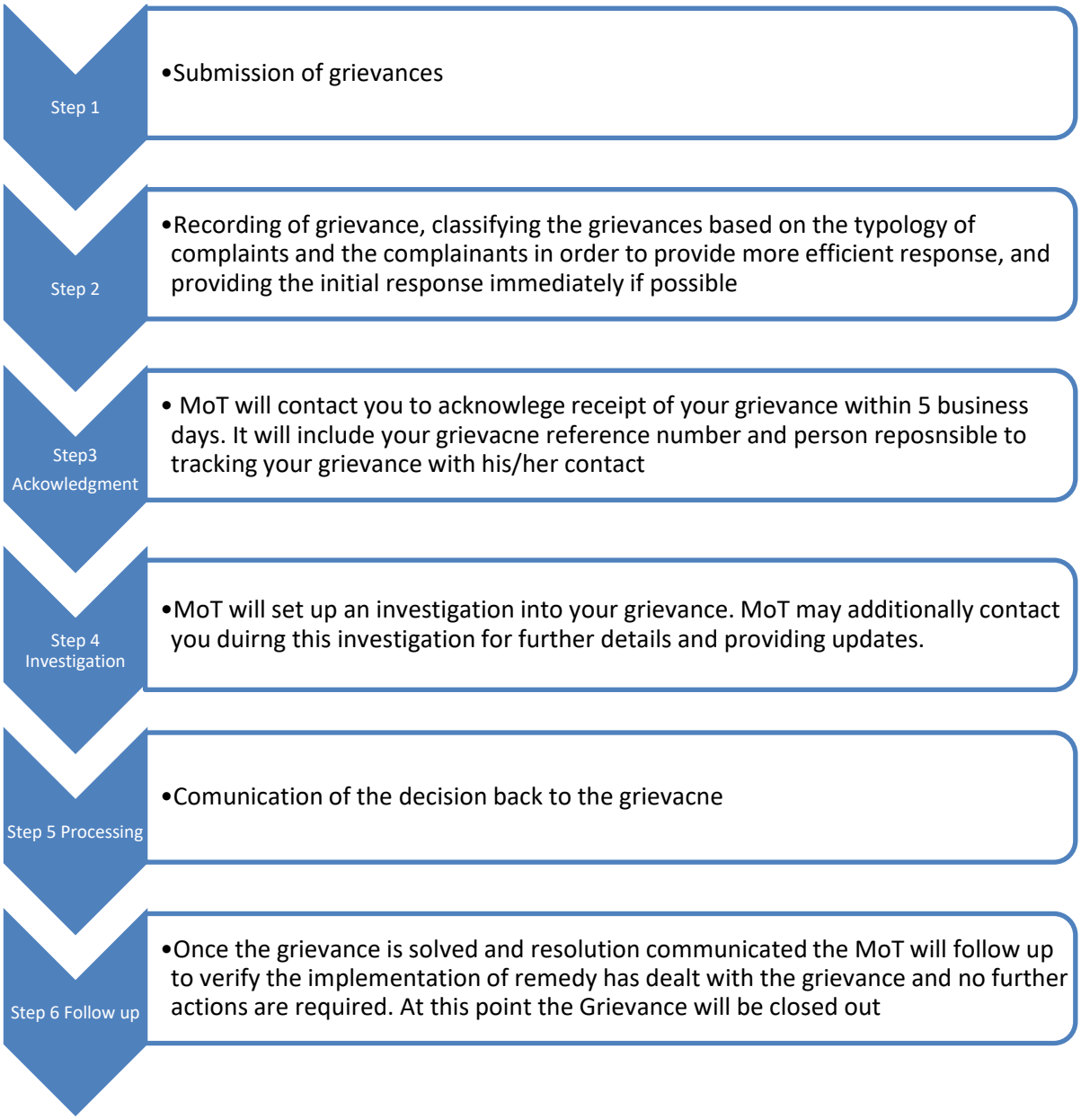
Address: Rimski Trg 46,

81100 Podgorica

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

How will the grievance be processed?

The following steps will be taken to deal with your grievance:



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Annex 5: List of railway level crossings with photo documentation of current state on site

No.	Railway level crossing	View 1	View 2
1.	Cijevna km 411+670	Podgorica - Bar 	Bar - Podgorica
2.	Mahala km 414+241	Podgorica - Bar 	Bar - Podgorica

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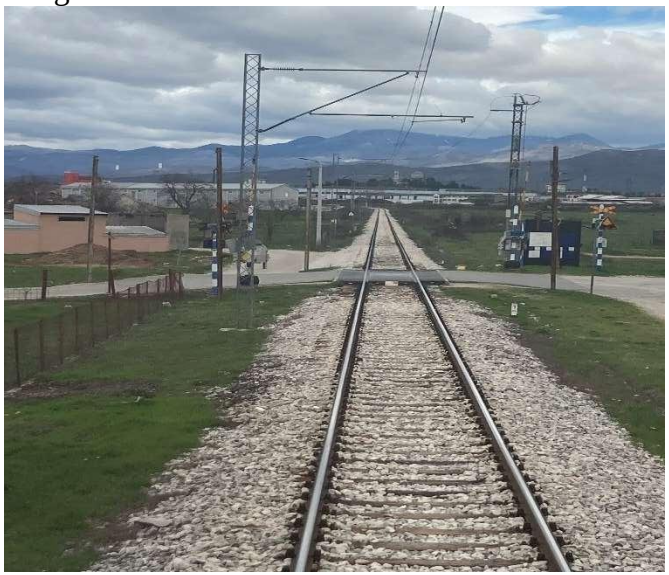
3.	Kličevo km 2+082	Nikšić - Podgorica 	Podgorica - Nikšić 
4.	Dabovići km 14+364	Nikšić - Podgorica 	Podgorica - Nikšić

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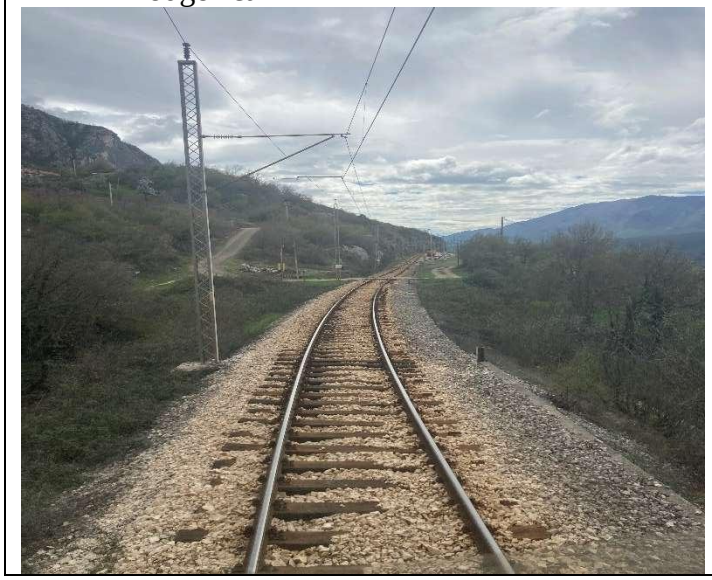
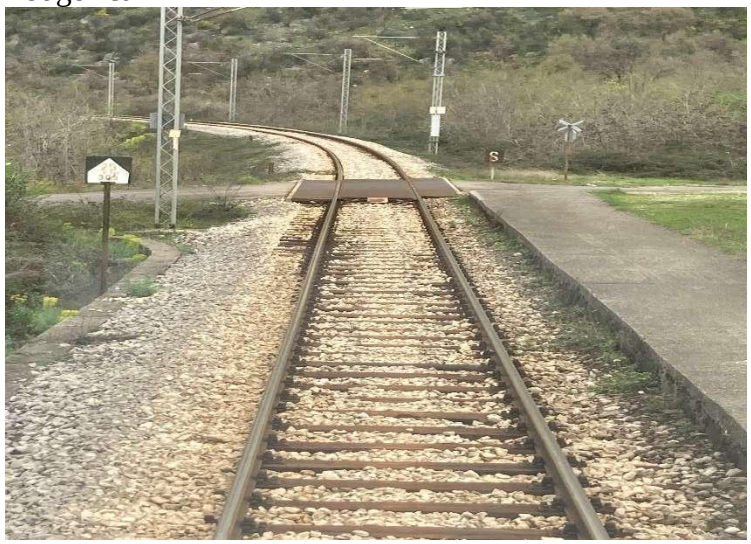
5.	Požar - Ostrog km 17+114	Nikšić - Podgorica 	Podgorica - Nikšić
6.	Šobajići km 21+014	Nikšić - Podgorica 	Podgorica - Nikšić 

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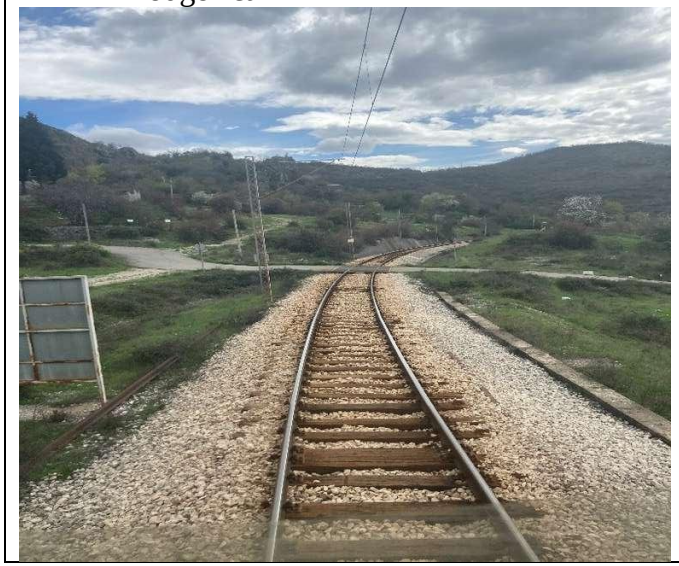
7.	Bare Šumanovića km 22+681	Nikšić - Podgorica 	Podgorica - Nikšić
8.	Slap km 26+426	Nikšić - Podgorica 	Podgorica - Nikšić

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9 .	Sekulići km 34+938	Nikšić - Podgorica 	Podgorica - Nikšić
10.	Kopito Petrovića km 36+588	Nikšić - Podgorica 	Podgorica - Nikšić

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11.	Kruščice km 37+595	Nikšić - Podgorica 	Podgorica - Nikšić
12.	Ljutotuk km 38+209	Nikšić - Podgorica 	Podgorica - Nikšić

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13 .	Martinići km 39+013	Nikšić - Podgorica 	Podgorica - Nikšić
14.	Prentina glavica km 40+255	Nikšić - Podgorica 	Podgorica - Nikšić

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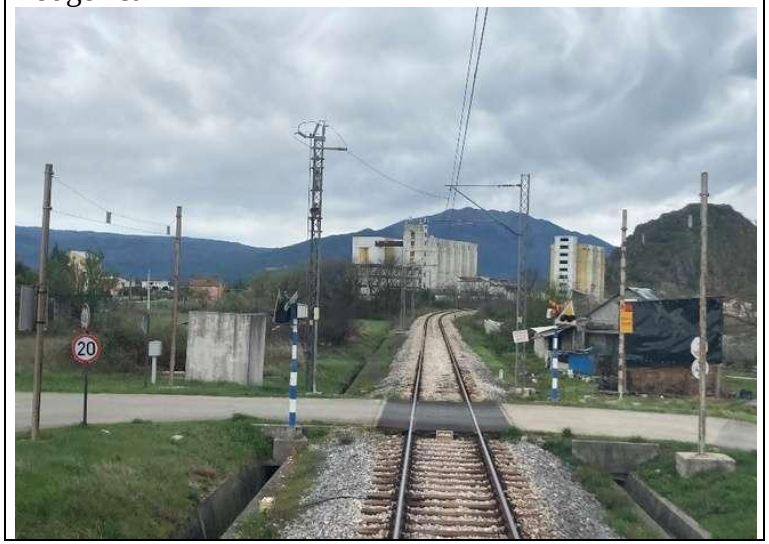
15.	Podglavica km 42+118	Nikšić - Podgorica 	Podgorica - Nikšić
16 .	Burum km 42+906	Nikšić - Podgorica 	Podgorica - Nikšić

Official Use Only

17.	Šunjine km 44+715	Nikšić - Podgorica 	Podgorica - Nikšić 
18.	Pričelje km 42+082	Nikšić - Podgorica 	Podgorica - Nikšić

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19.	Donje šume km 45+879	Nikšić - Podgorica 	Podgorica - Nikšić
20 .	Laze Radevića km 48+124	Nikšić - Podgorica 	Podgorica - Nikšić

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21.	Duklja km 51+586	Nikšić - Podgorica 	Podgorica - Nikšić
22.	Zagorič 2 km 52+689	Nikšić - Podgorica 	Podgorica - Nikšić

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ANNEX 6: Locations of underpasses in Pažići and Spuž, alternative road along the railway from the Sekulići road crossing to the Ždrebaonik road crossing on the Nikšić–Podgorica railway line and a Pedestrian Underpass at the Airport Railway Stop with photo documentation of the current state on site

No.	Site location	View 1	View 2
1.	Pažići underpass near to Danilovgrad	Podgorica - Nikšić	Nikšić - Podgorica

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2	Access road from the Sekulići road crossing to the Ždrebaonik road crossing	Podgorica - Nikšić 	Nikšić - Podgorica

Official Use Only

3	Spuž underpass	Podgorica - Nikšić 	Nikšić - Podgorica

Official Use Only

4	Aerodrom stop	Podgorica - Bar 	Bar - Podgorica

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ANNEX 7: MEETING MINUTES FROM STAKEHOLDER CONSULTATIONS CARRIED OUT IN MAY/JUNE 2026

Minutes of the Stakeholder Consultation Meeting

Project Name:	Western Balkans Trade and Transport Facilitation Project – Phase 2
Project No:	MNE-WBTTFP-94710
Date:	12.05.2026 at 8am
Location:	Ministry of Transport
Participants:	MoT Bojana Laković ZICG Tamara Todorović PIU Sonja Mamić, Nataša Veljković, Milica Daković Representatives of the national institutions and railway companies

Introduction

On May 12, 2026, representatives of the Ministry of Transport (MoT), Railway Infrastructure of Montenegro (ZICG) and the Project Implementation Unit (PIU), conducted a stakeholder consultation meeting with representatives of public institutions and railway companies.

The purpose of the meeting was to familiarize participants with the Project and the recent activities undertaken by the MoT in relation to its progress, with particular emphasis on Component 2, as well as to present the key Environmental and Social (E&S) requirements in accordance with the World Bank Environmental and Social Standards.

A total of 12 participants attended the stakeholder consultation meeting, representing the following institutions: the Customs Administration, the Environmental Protection Agency, the Ministry of Maritime Affairs, Railway Passenger Transport of Montenegro, Montecargo, and the Ministry of Transport (the Attendance sheet and photo log provided in Appendices 1 and 2).

All participants were provided with a Project leaflet containing key information about the Project and the related Environmental and Social (E&S) requirements, as well as copies of the presentation materials.

Topics discussed

Mrs. Bojana Lakovic (Acting Director General of the Directorate for capital projects and international cooperation, MoT) opened the meeting and presented to the participants key information about the project. The Loan Agreement for the Second Phase of the Western Balkans Trade and Transport Facilitation Project (TTFP) in Montenegro was signed with the World Bank on 13 February 2023, with project completion scheduled for 30 April 2028. The MoT is responsible for overall project implementation, with key beneficiaries including the Ministry of Finance and Customs Administration, the Ministry of Maritime Affairs, and the ZICG. Phase 2 further focuses on strengthening climate resilience in the transport sector through targeted railway infrastructure improvements, early warning systems, and institutional capacity building, in line with regional strategies and commitments. Additionally, EUR 9.5 million in SSTP grant funding has been approved to support railway crossing upgrades and related infrastructure, with grant agreements expected to be signed in June 2026. As part of project restructuring to accommodate the grant, certain activities have been revised, including replacing the digitalization of the Port of Bar with the implementation of a Port Community System. Key activities also include updating the Transport Development Strategy (2019–2035) and preparing revised environmental and social management documentation in accordance with World Bank standards and national legislation.

Mrs. Sonja Mamic (Project Manager, PIU) introduced the participants to the Project components in greater detail, with particular emphasis on the key features of Component 2 and provided an overall overview of the activities undertaken by the PIU to date as well as the purpose of the consultation meetings. In addition to the improvement of 22 rail level crossings on the Podgorica–Nikšić and Podgorica-Bar line and the construction of an underpass and alternative road to eliminate two railway level crossings on the Nikšić–Podgorica line, other specific activities that were highlighted are the development of the National Single Window and preparation of the Draft Law on the NSW, development of the Port Community System, and preparation of the technical designs for the building and equipment of the new customs inspection facility at the Port of Bar, including procurement of related equipment. These activities were emphasized as they could potentially have environmental and/or social impacts.

Mrs. Tamara Todorovic (PIU, ZICG) introduced the participants to the Project from the perspective of ZICG, highlighting its importance for enhancing future railway safety and improving the efficiency of rail transport. It was emphasized that the project aims to reduce trade costs and improve transport efficiency through streamlined documentation processes, increased transparency, and reduced administrative burdens, ultimately enhancing competitiveness and lowering emissions.

Mrs. Natasa Veljkovic (Environmental Expert, PIU) introduced the participants to the key environmental requirements to be implemented under the Project in accordance with the World Bank Environmental and Social Standards, highlighting the level of environmental risks and the recent activities related to the update of the Environmental and Social (E&S) documentation relevant to the Project. In addition, she explained that the enviromental risk are connected mainly to constuction activities under components 1 and 2 of the Project and that mitigation measures related to recognised risks have been developed. Key environmental mitigation measures are related to air, noise, waste and water drainage management.

Mrs. Milica Dakovic (Social Expert, PIU) introduced the participants to the key social aspects of the Project that are being considered and implemented in accordance with the World Bank Environmental and Social Standards. Particular emphasis was placed on the importance of timely consultations with relevant stakeholders throughout all stages of the Project. The participants were also introduced to the set of documents prepared and publicly disclosed online as part of the Project disclosure package addressing the social aspects of the Project, including the Environmental and Social Management Framework (ESMF), Resettlement Policy Framework (RPF), Stakeholder Engagement Plan (SEP), and Labor Management Procedures (LMP). Mrs. Dakovic provided key information regarding the potential social impacts of the Project, noting that the activities financed under the World Bank grant will not require permanent land acquisition or expropriation. At the same time, potential social risks and impacts have already been identified and are being addressed through appropriate mitigation measures. Furthermore, Mrs. Dakovic emphasized the importance of the public consultation process and provided the participants with detailed information on the Project Grievance Mechanism.

There were no additional questions raised by the participants.

Appendix 1_Attendance sheet

Western Balkans Trade and Transport Facilitation Project Phase 2

Subject: Stakeholder Consultation Meeting

Stakeholder group: National institutions

Location: MOT, PODGORICA

Date: 12/05/2026

Time: 08:00

Organized by: Project Implementation Unit (PIU)

ATTENDANCE SHEET

ORGANISATION	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
MOT	Bojana Labović	Acting Director General, coordinator	bojana.labovic@msa.gov.me	067 860 240	Labović Bojana
PIUM	Tamara Todorović	PIU	tamara.todorovic@mg.me	068 869 791	Tamara Todorović
PIU MOT	Milica Đaković	SOCIAL EXPERT	milicadjakovic@oseanstrategy.co.me	069 459 926	
PIU MOT	Nataša Veljković	ENV. EXPERT	natasa.veljkovic@outlook.com	060 711 0457	
EPA	Dragana Mirović	Savjetnik	dragana.mirovic@epa.org.me	067/378-194	
Customs Administration	Miloš Vujović	adviser	milos.vujovic@carina.gov.me	067 497 924	
MOMA	Stefan Milanović	advisor	Stefan.milanovic@ups.gov.me	067 66 96 22	

Western Balkans Trade and Transport Facilitation Project Phase 2

ORGANISATION	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
ŽPCG	Miroslav Đuraić	Menadžer za OSP, planiranje i analizu RV	miroslav.djuraic@zpcg.me	068/852-888	
MOT	Filip Spaić	VNKE	filip.spaic@gov.me	069-641-886	
MONTECARGO	Kajić Dženeta	director, sector za komercijalne	dzeneta.kajic@montecargo.me	067 482 180	
MONTECARGO	Zoran Đukanović	director sector za ekonomske	zorankukujevic@montecargo.me	068/877 995	
PIU MOT	Sonja Matić	project manager	sonja.matic@mpa.gov.me	063 231 283	

Appendix 2_Photo log

Minutes of the Stakeholder Consultation Meeting

Project Name:	Western Balkans Trade and Transport Facilitation Project – Phase 2
Project No:	MNE-WBTTFP-94710
Date:	19.05.2026 at 9:30am
Location:	Municipality Danilovgrad
Participants:	MoT-Direktorat za željeznički saobraćaj, Slavica Knežević ŽICG Tamara Todorović PIU Sonja Mamić, Nataša Veljković, Milica Daković Representatives of the Municipality of Danilovgrad and the residents of the local communities.

Introduction

On 19 May 2026, representatives of the Ministry of Transport (MoT), the Railway Infrastructure of Montenegro (ŽICG), and the Project Implementation Unit (PIU) held a consultative meeting with stakeholders, attended by representatives of the Municipality of Danilovgrad and municipal secretariats, as well as local residents from the local communities (LC Jelenak-Martinići, LC Gorica, LC Vražegrmci, and Lalevići). The purpose of the meeting was to familiarize participants with the Project and the recent activities undertaken by the Ministry of Transport regarding its implementation, with a particular focus on Component 2, as well as to present the key environmental and social (E&S) requirements in accordance with World Bank standards.

A total of 16 participants attended the meeting.

All participants were provided with a promotional leaflet about the Project, containing key information about the Project and the relevant environmental and social (E&S) requirements, as well as copies of the presentation materials.

Topics dissussed

Ms. Sonja Mamić (Project Manager, PIU) opened the meeting and presented the project components, with a particular focus on Component 2, as well as an overview of the activities implemented by the PIU to date and the purpose of the consultative meetings. In addition to the upgrading of 22 railway crossings on the Podgorica–Nikšić railway line and the construction of an underpass and an alternative road to eliminate two railway crossings on the Podgorica–Nikšić and Podgorica–Bar railway lines, activities such as the development of the National Single Window (NSW) and the preparation of the Draft Law on the NSW, as well as the development of the Port Community System, were highlighted.

Ms. Tamara Todorović (ŽICG) presented the project from the perspective of ŽICG, emphasizing its importance for improving railway traffic safety and transport efficiency. It was highlighted that the project aims to reduce trade costs and improve transport efficiency through the simplification of procedures, increased transparency, and the reduction of administrative burdens, thereby contributing to enhanced competitiveness and reduced emissions.

Ms. Slavica Knežević (Acting Director General of the Directorate for Railway Transport) emphasized the importance of modernization from the perspective of traffic safety and efficiency, as well as the particular importance of the Podgorica–Nikšić railway line due to its connection with Čapljina, which forms part of the Pan-European Corridor.

Ms. Milica Daković (Social Specialist, PIU) presented the key social aspects of the project that are being considered and implemented in accordance with World Bank standards. Particular emphasis was placed on the importance of timely consultations with stakeholders throughout all phases of the project. Participants were also informed about the documents prepared and publicly disclosed under the project, including the Environmental and Social Management Framework (ESMF), the Resettlement Policy Framework (RPF), the Stakeholder Engagement Plan (SEP), and the Labor Management Procedures (LMP). Ms. Daković presented the potential social impacts of the project, emphasizing that activities financed through World Bank grant funds do not require permanent land acquisition or expropriation, but that potential risks have already been identified and addressed through appropriate mitigation measures. She also highlighted the importance of the public consultation process and presented the grievance mechanism established within the project.

Participants were actively engaged during the consultative meeting and presented the following comments, remarks, and suggestions:

1. **Mr. Željko Savović (Lalevići village)**

- He lives 200 meters from the railway line.
- The issue of railway crossings has been a long-standing concern. Residents possess a document in which ŽICG committed to constructing an underpass in Lalevići. He also noted that, in the past, the Municipality of Danilovgrad had planned a railway crossing opposite the marble factory in order to prevent flooding, which is a frequent occurrence in that area.
- Residents of Lalevići are exposed on a daily basis to health and safety risks because they pass underneath the high-voltage power network.
- He announced that if the planned railway crossing modernization proceeds, the residents of Lalevići will react in order to ensure that their long-standing demands are fulfilled, as they had previously ceded their land during the construction of the railway line.
- He invited representatives of the Ministry of Transport (MoT) and ŽICG to visit the site in order to assess the situation firsthand.
- He considers that the selection of the 22 railway crossings is inadequate and that the village of Lalevići was not taken into consideration, and therefore requested that the issue of the railway crossing in Lalevići, as well as the paving of the access road, be resolved.

- He pointed out the issue concerning the well in Pažići–Lalevići, as it is connected with the receiving waters, which may have an impact on the biodiversity of the Zeta River (trout population).
- He pointed out the poor condition of the trains and the lack of hygiene.
- He proposed that residents – landowners in the Podostrog villages area – should receive free train tickets on weekends, as depopulation is occurring, while such a measure could encourage residents to return to the villages.
- He asked whether there is an obligation to install protective fencing along the railway line, as this is necessary for the villages of Lalevići. Representatives of the MoT stated that there is an obligation to install protective fencing, but only on certain sections of the railway line, and that funding for this purpose would be planned in the future.
- His key remark referred to the fact that the residents of Lalevići were not initially consulted by the competent institutions regarding the definition of the railway crossings and overpasses to be included in the modernization project; that there is a lack of continuity in project planning policies; and that the issue of constructing an underpass in Lalevići remains unresolved and will likely be raised again and potentially affect the implementation of the project if not addressed in a timely manner.

2. **Mr. Novo Stanišić (LC Vražegrmci)**

- He stated that 85% of the local community's population relocated during the construction of the railway.
- He asked whether there is a possibility of procuring a new train.
- He pointed out that if works are carried out, attention must be paid to preserving the quality of access roads affected by the movement of machinery. He noted that during the implementation of the railway electrification project, this issue had not been adequately considered, resulting in damage to roads caused by construction machinery.
- He pointed out the need for regular analysis of water quality from the railway station or consideration of constructing a new water intake system. ZICG indicated that the Danilovgrad station is connected to the public water supply network, while the control and monitoring of drinking water quality are carried out by the water supply operator (Danilovgrad Water Utility).
- He pointed out that the railway stations Slap and Ostrog, although equipped with three tracks, are inaccessible for cargo transshipment and freight transport, and therefore suggested constructing a road for these purposes and enabling goods transshipment.
- He stated that the railway line would only make sense if it were further connected to Bosnia and Herzegovina and Serbia, and asked about the possibility of connecting the existing railway line with Republika Srpska.

3. **Ms. Gordana Razić (LC Gorica)**

- She emphasized the importance of optimizing railway crossings.
- She raised a remark regarding the train timetable. Representatives of the MoT suggested contacting ŽPCG regarding the new timetable in accordance to citizens needs.

4. **Mr. Slobodan Mišković (LC Jelenak)**

- He remarked that a very small number of passengers use the Podgorica–Nikšić railway line and pointed out the need to procure two new trains.

5. **Mr. Dušan Stijović**

- He emphasized the importance of the corridor towards Čapljina and its connection with European corridors, as well as the need to connect the Podgorica–Nikšić railway line to those corridors.

Following the comments and suggestions raised by the residents, Ms. Daković provided participants with more detailed information regarding World Bank standards related to the timely and continuous informing of stakeholders about the project, emphasizing that the purpose of the consultative meeting itself was to inform stakeholders about the project at an early stage. Participants were also informed about the Entitlement Matrix, as well as the possibility of using the Grievance Mechanism in the event of any comments or complaints during different phases of the project. On the other hand, it was emphasized that the purpose of this consultative meeting was specifically related to the implementation of Component 2 and the activities it entails, while also highlighting that consultations are a continuous process that will continue in the future period.

Appendix 1_Attendance sheet

Western Balkans Trade and Transport Facilitation Project Phase 2

Subject: Stakeholder Consultation Meeting

Stakeholder group: Municipality Danilovgrad and the pertaining stakeholders

Location: MUNICIPALITY DANILOVGRAD

Date: 19.05.2026

Time: 09:30

Organized by: Project Implementation Unit (PIU)

ATTENDANCE SHEET

INSTITUTION	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
M2. JEDINAK MATIJA	DUSAN STOJOVIĆ	ČLAN M2.	DUSAN.STOJOVIC@GMAIL.COM	067 240 240	
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MZ GORICA	Gordana Razić	predsjednica Savjeta MZ	gordanarazic18@gmail.com	069 346 666	
MZ Вранеши	Небојша Савковић	председник МЗ Вранеши		068 589 956	
SEKR. ZA DRUM. POSOV. I SAOBRAĆ	BRANKA ŽEGLAK	SEKRETARKA SEKRETARIJ.	branka.zeglak@danilovgrad.me	067/102-352	
SEKR. ZA IMOVINU, INVESTICIJE I ZASTUP.	Vojislav Bošković	VIŠI JAVNI SAVJETNIK II ZA UPRAVLJANJE IMOVINOM	imovina@danilovgrad.me	067/673-100	
SEKR. ZA IMOVINU, INVESTICIJE I ZASTUPANJE	Suzana Perović		perovicsuzana08@gmail.com	067/545-719	
SEK. ZA LOKALNU SAMOUPRAVU	VUK JANJUSEVIĆ	SEKRETAR	vuk.janjusevic@danilovgrad.me	069179494	

Western Balkans Trade and Transport Facilitation Project Phase 2

INSTITUTION	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
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"		odbornica O.	—	069015804	
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PIU MOT	Nataša Veljković	ENV. EXPERT (online)	natasa.veljkovic@outlook.com	060 711 0455	
PIU MOT	Milica Dekanić	Social Expert	milica.dekanic@eeconsulting.co.me	069 459 926	
MOT	Slavica Knežević	V.d generalne direktorice za železnički saobraćaj	slavica.knezevic@msa.gov.me		
RIOM	Tamara Todorović	PIU	tamara.todorovic@zicg.me	068 869 791	

Appendix 2_Photo log

Minutes of the Stakeholder Consultation Meeting

Project Name:	Western Balkans Trade and Transport Facilitation Project – Phase 2
Project No:	MNE-WBTTFP-94710
Date:	19.05.2026 at 1pm
Location:	Municipality Niksic
Participants:	ŽICG Tamara Todorović PIU Sonja Mamić, Nataša Veljković, Milica Daković Representatives of Niksic municipality

Introduction

On 19 May 2026, representatives of the Railway Infrastructure of Montenegro (ŽICG) and the Ministry of Transport Project Implementation Unit (PIU) held a consultative meeting with representatives of the Municipality of Nikšić. The purpose of the meeting was to familiarize participants with the Project and the recent activities undertaken by the Ministry of Transport regarding its implementation, with a particular focus on Component 2, as well as to present the key environmental and social (E&S) requirements in accordance with the World Bank standards.

A total of 7 participants attended the meeting, including 3 representatives from the Municipality of Nikšić and the Secretariat for Communal Affairs and Transport.

All participants were provided with a leaflet about the Project, containing key information about the Project and the relevant environmental and social (E&S) requirements, as well as copies of the presentation materials.

Topics discussed

Ms. Sonja Mamić (Project Manager, PIU) provided a more detailed presentation of the project components, with a particular focus on Component 2, as well as an overview of the activities implemented by the PIU to date and the purpose of the consultative meetings. In addition to the upgrading of 22 railway crossings on the Podgorica–Nikšić railway line and the construction of an underpass and an alternative road to eliminate two railway crossings on the Podgorica–Nikšić and Podgorica–Bar railway lines, activities such as the development of the National Single Window (NSW) and the preparation of the Draft Law on the NSW, the development of the Port Community System, as well as the preparation of technical documentation for the construction and equipping of a new customs inspection facility in the Port of Bar, including the procurement of equipment, were highlighted.

Ms. Tamara Todorović (ŽICG) presented the project from the perspective of ŽICG, emphasizing its importance for improving railway traffic safety and transport efficiency. It was highlighted that the project aims to reduce trade costs and improve transport efficiency through the simplification of procedures, increased transparency, and the reduction of administrative burdens, thereby contributing to enhanced competitiveness and reduced emissions.

Ms. Milica Daković (Social Specialist, PIU) presented the key social aspects of the project that are being considered and implemented in accordance with World Bank standards. Particular emphasis was placed on the importance of timely consultations with stakeholders throughout all phases of the project. Participants were also informed about the documents prepared and publicly disclosed under the project, including the Environmental and Social Management Framework (ESMF), the Resettlement Policy Framework (RPF), the Stakeholder Engagement Plan (SEP), and the Labor Management Procedures (LMP). Ms. Daković presented the potential social impacts of the project, emphasizing that activities financed through the World Bank grant funds do not require permanent land acquisition or expropriation, but that potential risks have already been identified and addressed through appropriate mitigation measures. She also highlighted the importance of the public consultation process and presented the grievance mechanism established within the project.

Ms. Nataša Veljković (Environmental Specialist, PIU) informed participants about the key environmental requirements applicable under the project in accordance with World Bank standards, highlighting the level of environmental risks and the activities related to updating environmental and social documentation. It was emphasized that environmental risks are mainly associated with construction works under Components 1 and 2, and that mitigation measures have been defined, particularly in the areas of air quality, noise, waste management, and water drainage.

Participants raised the following issues:

1. **Mr. Vidak Krtolica, Vice President of the Municipality of Nikšić**

- He emphasized the importance of the railway and railway transport in the context of the future Adriatic-Ionian Highway project, as well as the importance of investing in railway infrastructure in terms of regional connectivity.

- He asked about the current stage of preparation of the Čapljina–Nikšić study. ŽICG indicated that the preparation of the 'Preliminary Design, Studies and Spatial Planning Document for the Regional Railway Line Čapljina–Trebinje–Nikšić' had been completed in the previous period. The project included a preliminary transport study, a preliminary environmental impact assessment, a preliminary cost estimate, and a preliminary design solution.
- He pointed out the issue and the need to resolve the matter of the industrial railway track near the Nikšić Steel Plant and its immediate proximity to the main road.
- He highlighted the need to install protective fences in populated areas located along the railway line.
- It was noted that Kličevo 2 had previously been planned to include an underpass as well, but this is not envisaged under the current project. Residents of the Kličevo settlement have expressed the need for the construction of an underpass at that location for an extended period of time.

2. **Mr. Milan Bošković, Head of the Transport Sector**

- It was pointed out that within the territory of the Municipality of Nikšić there is only one railway crossing (Kličevo 2) included in the railway crossing modernization project. The remaining crossings are located within the territory of the Municipality of Danilovgrad, while the Dabovići railway crossing is situated on the border between the two municipalities.

Appendix 1_Attendance sheet

Western Balkans Trade and Transport Facilitation Project Phase 2

Subject: Stakeholder Consultation Meeting

Stakeholder group: Municipality Nikšić and the pertaining stakeholders

Location: Municipality Nikšić

Date: 19.05.2026

Time: 13:00

Organized by: Project Implementation Unit (PIU)

ATTENDANCE SHEET

INSTITUTION	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
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PIU MOT	Nataša Velković	ENV. EXPERT (online)	natasa.velkovic@outlook.com	060 711 0455	
PIU MOT	Milica Dakić	Social Expert	milica.dakic@pjconsulting.co.me	069 454 126	
RIOM	Tamara Todorović	PIU	tamara.todorovic@21cg.me	068 869 791	

Appendix 2_Photo log

Minutes of the Stakeholder Consultation Meeting

Project Name:	Western Balkans Trade and Transport Facilitation Project – Phase 2
Project No:	MNE-WBTTFP-94710
Date:	27.05.2026 at 9am
Location:	online
Participants:	PIU Sonja Mamić, Nataša Veljković, Milica Daković NGO representatives: Stefan Bulatović, NGO Biciklo.me Kristijan Ćalić, NGO Center for climate change, natural resources and energy, University Donja Gorica Blažo Crvenica, NGO Terra

Introduction

On 27 May 2026, representatives of the Ministry of Transport Project Implementation Unit (PIU) held a consultation meeting with representatives of the NGO sector. The purpose of the meeting was to familiarize participants with the Project and the recent activities undertaken by the Ministry of Transport in relation to its implementation, with a particular focus on Component 2, as well as to present the key Environmental and Social (E&S) requirements in accordance with World Bank standards.

A total of six participants attended the meeting, including three representatives of NGOs.

Topics discussed

Ms. Sonja Mamić (Project Manager, PIU) provided a more detailed presentation of the project components, with a particular focus on Component 2, as well as an overview of the activities implemented by the PIU to date and the purpose of the consultation meetings. In addition to the upgrading of 22 railway crossings on the Podgorica–Nikšić railway line and the construction of an underpass and an alternative road to eliminate two railway crossings on the Podgorica–Nikšić and Podgorica–Bar railway lines, activities such as the development of the National Single Window (NSW) and the preparation of the Draft Law on the NSW, the development of the Port Information System, and the preparation of technical documentation for the construction and equipping of a new customs inspection facility at the Port of Bar, including the procurement of equipment, were also highlighted.

Ms. Nataša Veljković (Environmental Specialist, PIU) informed participants about the key environmental requirements applicable to the project in accordance with World Bank standards, highlighting the level of environmental risks and activities related to updating environmental and social (E&S) documentation. It was emphasized that environmental risks have been assessed as moderate and are mainly associated with construction works under Components 1 and 2. Mitigation measures have been defined, particularly in the areas of air quality, noise management, waste management, and water drainage.

Ms. Milica Daković (Social Specialist, PIU) presented the key social aspects of the project that are being considered and implemented in line with World Bank standards. Particular emphasis was placed on the importance of timely stakeholder consultations throughout all stages of the project.

Participants were also informed about the documents prepared and publicly disclosed under the project, including the Environmental and Social Management Framework (ESMF), the Resettlement Policy Framework (RPF), the Stakeholder Engagement Plan (SEP), and the Labor Management Procedures (LMP). Ms. Daković presented the potential social impacts of the project, emphasizing that activities financed through World Bank grant funds do not require permanent land acquisition or expropriation, but that potential risks have already been identified and addressed through appropriate mitigation measures. She also highlighted the importance of the public consultation process and presented the grievance mechanism established under the project.

Participants raised the following issues:

1. Mr. Stefan Bulatović, NGO Biciklo.me

Following the presentation, Mr. Bulatović raised the following questions:

1. Does the project envisage adapting railway crossings in a way that also addresses pedestrian crossings?
2. What does the rehabilitation of the 22 railway crossings entail, and does it include pedestrian crossings?
3. Is it possible to review the design of the Airport underpass project?

Ms. Mamić explained that the project does not include dedicated pedestrian crossings, as all railway crossings at the specified locations have already been reconstructed from a civil engineering perspective. The planned interventions are limited to improving safety at railway crossings through enhanced signaling. At only one location, the works also include civil engineering interventions in the form of installing rubber panels at the railway crossing. Regarding the Airport railway stop underpass project, access to the design will only be possible once the project documentation has been prepared, considering that the project will be implemented under a Design & Build approach.

Mr. Bulatović suggested that particular attention should be paid to persons with disabilities, including the provision of lighting, tactile paving, and accessible crossings. The PIU clarified that this issue is being carefully considered, given that the World Bank places special emphasis on vulnerable groups, and that these considerations have been duly reflected in the project's environmental and social documentation.

Minutes of the Stakeholder Consultation Meeting

Project Name:	Western Balkans Trade and Transport Facilitation Project – Phase 2
Project No:	MNE-WBTTFP-94710
Date:	09.06.2026 at 9am
Location:	Winery 'Radevic'
Participants:	PIU representatives: Sonja Mamic, Milica Dakovic ZICG representatives: Tamara Todorovic, Radovan Vujovic, Radovan Jovanovic Stakeholder: Goran Radevic, Winery 'Radevic' owner

Introduction

On 9 June 2026, representatives of the Ministry of Transport Project Implementation Unit (PIU) and the Railway Infrastructure of Montenegro (ŽICG) held a consultation meeting with a stakeholder, namely the representative and owner of the legal entity **"Radević Winery",** which is located in the immediate vicinity of the **"Laze Radevića" railway crossing (km 48+124)**.

The purpose of the meeting was to inform the company about the Project and the planned activities, with particular emphasis on the interventions envisaged at railway crossings. The meeting also provided an opportunity to present the key Environmental and Social (E&S) requirements applicable to the Project in accordance with World Bank standards, with a specific focus on social aspects and the rights of stakeholders throughout the Project implementation process.

A total of six participants attended the meeting.

Topics discussed

Ms. Sonja Mamić (Project Manager, PIU) provided a detailed presentation of the Project components, with particular emphasis on Component 2 and the planned activities related to the upgrade of 22 railway crossings. During her presentation, she outlined the envisaged project activities and implementation timeline, highlighting that the railway crossing upgrade project will be carried out through a Design & Build approach, whereby the selected contractor will be responsible for both the preparation of the design documentation and the execution of works. These activities will be supervised by an independent Supervision Engineer to be selected through a procurement process currently underway.

With regard to the implementation schedule, it was noted that the overall project completion deadline is April 2028, while construction works are expected to commence in early 2027, subject to the fulfillment of the necessary preconditions, including the preparation and approval of design documentation and the issuance of the required construction permits.

Ms. Tamara Todorović (Railway Infrastructure of Montenegro – ŽICG) presented the Project from the perspective of ŽICG, emphasizing its importance for improving railway safety and enhancing transport efficiency. It was highlighted that the Project aims to reduce trade-related costs and improve transport efficiency through streamlined procedures, increased transparency, and reduced administrative burdens. Particular emphasis was placed on the fact that the modernization of railway crossings will contribute to safer and more efficient transportation for both local communities and business entities operating in the area.

Ms. Milica Daković (Social Specialist, PIU) presented the key social aspects of the Project that are being considered and implemented in accordance with World Bank standards. Particular attention was given to the importance of timely and meaningful stakeholder engagement throughout all phases of Project implementation. Ms. Daković emphasized that the Project does not envisage permanent land acquisition or expropriation; however, potential social risks have been identified and addressed through appropriate mitigation measures. She also highlighted the importance of maintaining continuous public consultations and presented the Project Grievance Mechanism, including information on how stakeholders may access and utilize it during the various stages of Project implementation.

Mr. Goran Radević (stakeholder and owner of "Radević Winery") informed participants about the previous initiatives and activities that led to the construction of the existing "Laze Radevića" railway crossing. He explained that, as the owner of land located on both sides of the railway line, he submitted an initiative to ŽICG in 2008 requesting the construction of a railway crossing that would provide access to the future winery and could also be used by the local population. The initiative was additionally supported by local residents through a signed petition requesting the construction of the crossing, with only two residents opposing the proposed location as they preferred the crossing to be situated closer to their properties.

Following the submission of the initiative, ŽICG identified the location of the crossing and proceeded with its design and construction. Mr. Radević further explained that he had proposed the preparation of an underpass design and expressed his willingness to finance its construction using his own resources. However, this proposal was not approved due to the fact that the railway line had already been reconstructed and the technical conditions required for the construction of an underpass were not available at that time.

Mr. Radević also shared his personal experience of a serious traffic accident that occurred at the railway crossing in 2013, when the vehicle in which he was travelling with his daughter stalled while on the crossing and was subsequently struck by a train. As a result of the collision, Mr. Radević sustained severe injuries and remained in a coma for five days, while his daughter suffered minor injuries. Drawing on this experience, he stressed that the implementation of the proposed railway crossing upgrade project is both urgent and necessary. He expressed his full support for the Project and confirmed his willingness to actively participate in and support its implementation in order to contribute to improving safety conditions at the crossing.

Appendix 1_Attendance sheet

Western Balkans Trade and Transport Facilitation Project Phase 2

Subject: Stakeholder Consultation Meeting

Stakeholder group: Businesses in the Area of Influence

Location: Vinarija Radević

Date: 9.6.2026.

Time: 9-10 h

Organised by: Project Implementation Unit (PIU)

ATTENDANCE SHEET

COMPANY	NAME/SURNAME	POSITION	EMAIL	PHONE	SIGNATURE
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Appendix 2_Photo log