

MONTENEGRO

**STAKEHOLDER ENGAGEMENT PLAN
(SEP)**

for the

**Western Balkans Trade and Transport Facilitation Project
Phase 2**

P 173620

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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
MoCI	Ministry for Capital Investments
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

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 WBTF supported by the World Bank and implemented by the Ministry for Capital Investments through a Project Implementation Unit (PIU) to be established within 30 days following the signature of the Loan Agreement.

Project Affected parties: includes 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

Recalibrating Stakeholder engagement: Adapting activities of stakeholder engagement in the times of the COVID-19 pandemic and the need for physical distancing.

Stakeholder Engagement Plan (SEP): This Plan document prepared to guide development of sub-project specific SEPs, and ensure effective stakeholder engagement while transitioning towards them.

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.

1. INTRODUCTION

1.1 Project Description and Context

The Government of Montenegro has requested support from the World Bank (Hereinafter: The Bank) to implement the Second Phase of the Western Balkans Trade and Transport Facilitation Project

The project aims at reducing trade costs and increase transport efficiency in the Western Balkans Six. The program 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) New Computerized Transit System (NCTS) to Montenegro; (iii) the improvements of crossing points in selected trade corridors (though upgrading of IT systems at Hani i Hotit – Bozaj road border crossing).

Component 2: Enhancing transport efficiency and predictability focusing on (i) the digitalization of the Port of Bar; (ii) the improvement of selected Railway Level Crossings on section Podgorica – Bar (RLC), (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 and studies (iv) the preparation of the corridor monitoring system.

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

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 Capital Investments (MoCI), and oversight of the project will be in the hands of the MoCI, while the governance of the Project is also expected to include a Project Implementation Unit (PIU) housed under the MoCI. The Fiduciary Arrangements are nested in the Central Fiduciary Unit (CFU) housed under the Ministry of Finance (MoF).

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

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

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.

1.4 Project Locations

This project will be implemented nationwide with most of the locations identifiable e.g. 5 Rail Level Crossings on the Bar - Podgorica rail route (shown on left figure below) interventions at Bozaj - Hani i Hotit (connecting Montenegro with Albania) (shown in figure right below), upgrade of Port of Bar.



Figure 1: The Bar- Podgorica Rail line



Figure 2: BCP Bozaj-Hani i Hotit

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.

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 preparation of the Project was not significantly impacted by the constraints of the global COVID-19 pandemic.

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 for Capital Investments including safeguard documentation;
- Multiple meetings and communication exchange with local Governments.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

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

1) **Project Affected Parties.** These include 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:

- 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 rail route,
- Local communities at 5 locations of the Rail Level Crossing points,
- Companies at 5 locations of the RLCs
- Border crossing users at BCP Bijelo Polje and Hani Hotit – Bozaj envisaged for extension and upgrade,
- Passenger and cargo transport users Podgorica – Bar rail route,
- Persons affected by land acquisition and resettlement (it is highly unlikely that land will be required),
- Vulnerable groups.

The implementation plans to be developed might expand the list of projects affected parties. 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.

3.3 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 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.

The specific details of groups and individuals vulnerable to impacts from the project are not yet known since the details of locations and technological issues of activities are still to be identified. 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 chronic disease;
- People with low literacy and ICT knowledge,
- Children pedestrians using the RLCs.

3.4 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 1: 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

Table 2: 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, rail level crossings	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 living in the area of the BCP Bijelo Polje and Hani Hotit -Bozaj	Interest in potential impacts during civil works, duration of civil works, traffic management plan, waiting hours on the BCP due to ongoing works	High	Medium	Inform	
		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 of Bijelo Polje, Hani Hotit Bozaj, Bar, Podgorica	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	
		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	

Project Stakeholder Group		Nature of interest	Level of interest	Level of Influence	Level of engagement	
	Government Agencies and institutions					
			GHG emissions, and possibly other positive externalities. will benefit directly from the institutional, legal and regulatory strengthening and capacity building activities			
			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
		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 for Capital Investments (MOCI)	Main counterpart of the WB for Project implementation and permitting authority	High	High	Partner
		PIU hosed by MOCI	Project management and implementation, oversight, reporting, financial, environmental and social risk management, grievance management, SEP implementation and coordination	High	High	Partner
		Local Governments (including line departments: land management, economic	Serve as first point of contact, conduct field outreach, facilitate two-way communication	Medium	Low	Inform

Project Stakeholder Group		Nature of interest	Level of interest	Level of Influence	Level of engagement	
Other Interested Parties	Government Agencies and institution	development, environment)				
		Various Government Inspections such as Labor, Construction etc/	Interested in enforcement of legal requirements in all aspects of project implementation with emphasis during construction activities.	High	Medium	Consult
		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, NGO s	Interested in project benefits Interest in procurement and supply chain, potential environmental and social as well as community health and safety	Medium	Low	Inform

Project Stakeholder Group			Nature of interest	Level of interest	Level of Influence	Level of engagement
Other Interested Parties	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	People with low literacy and ICT knowledge; Children	Interested in accessibility, affordability of project investments and how the project will affect them, safety and mobility concerns	High	Low	Consult

3.5 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 3: *Expansion and update questionnaire*

STAKEHOLDER EXPANSION AND UPDATE NEED QUESTIONNAIRE	
<input type="checkbox"/> YES <input type="checkbox"/> NO <i>If No the Project needs to expand the Stakeholder list</i>	<p>Is the current list focused on relevant stakeholders who are important to our current and future efforts?</p> <p><i>(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)</i></p>
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If No the Needs assessment should be revisited or a supplementary conducted and Stakeholder list revisited</i>	<p>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?</p> <p><i>(The answers should be based on the frequency of stakeholders approaching through communication channels other than the Projects, with suggestion for inclusion of groups or eligible activities etc.)</i></p>
<input type="checkbox"/> Yes <input type="checkbox"/> No <i>If No the Stakeholder list should be revisited as well as admission and evaluation criteria should be revisited</i>	<p>Does the current engagement strategy adequately covers vulnerable groups?</p> <p><i>(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)</i></p>

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 though implementation and operation. All safeguard documents prepared in anticipation and in expectation of the financing agreement from the World Bank will be disclosed and consulted on before Project Appraisal takes place. Drafts of ESF documents (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 MoCI and WB.

4.2 Proposed Strategy for Disclosure

ESF documents (i.e. ESMF, ESCP, LMP, RPF and Project level SEP) The Disclosure Package will be disclosed electronically at the following websites:

- the website of the MOCI (<https://www.gov.me/mki>)
- the websites of Municipality Bar
- the websites of city of Podgorica
- World Bank`s website
- Through social media campaigns, and will be announced via various media, newspaper and radio at least 2 weeks ahead of the scheduled consultation dates.

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 website. 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 specialist will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan 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 outreach and stakeholder engagement will be gender appropriate, taking into consideration the after-hour chores of women. Targeted messaging will encourage the participation of women and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

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.

Different engagement methods are proposed, but driven by the COVID-19 considerations and restrictions the Project will adapt virtual communication and consultation methods taking into account social distancing requirements. Hence, alternative ways will be adopted in accordance with the local laws, policies and new social norms in effect to mitigate the virus transmission, as well as relevant WHO guidelines and the Banks' Technical Note: Public Consultations and Stakeholder Engagement in WB-supported operations when there are constraints on conducting public meetings.² The alternative approaches to be practiced for stakeholder engagement will include:

- (i) small groups consultations if smaller meetings are permitted, or making reasonable efforts to conduct meetings through online channels (e.g. webex, zoom, skype etc.); Where possible and appropriate, create dedicated online platforms and chatgroups appropriate for the purpose, based on the type and category of stakeholders;
- (ii) diversifying means of communication and relying more on social media, chat groups, dedicated online platforms & mobile Apps (e.g. Facebook, Twitter, WhatsApp groups, ViberApp groups, project weblinks/websites etc.);
- (iii) employing traditional channels of communications such TV, radio, dedicated phone-lines, SMS broadcasting, public announcements when stakeholders do not have access to online channels or do not use them frequently.
- (iv) Chose venues carefully based on hygiene and sanitation standards that can be achieved during the meetings;
- (v) Employ traditional channels of communications (TV, newspaper, radio, dedicated phone-lines, and mail) when stakeholders do not have access to online channels or do not use them frequently. Traditional channels can also be highly effective in conveying relevant information to stakeholders, and allow them to provide their feedback and suggestions;
- (vi) Where direct engagement with project affected people or beneficiaries is necessary, identify channels for direct communication with each affected household via a context specific combination of email messages, mail, online platforms, dedicated phone lines with knowledgeable operators;

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. The ESF instruments package will be available in English and Montenegrin while information about the Grievance Mechanism might be prepared in Albanian as well due to activities on the BCP with Albania.

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<https://worldbankgroup.sharepoint.com/sites/wbunits/opcs/Knowledge%20Base/Public%20Consultations%20in%20WB%20Operations.pdf>

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 MOCI website will have a dedicated Project page disaggregated by the following topic in the main Page: Project Background, Construction and Schedule of works, News, Land acquisition and resettlement, Grievance mechanism and Feedback (leave a comment or ask a question) MOCI 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, MOCI 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.

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.

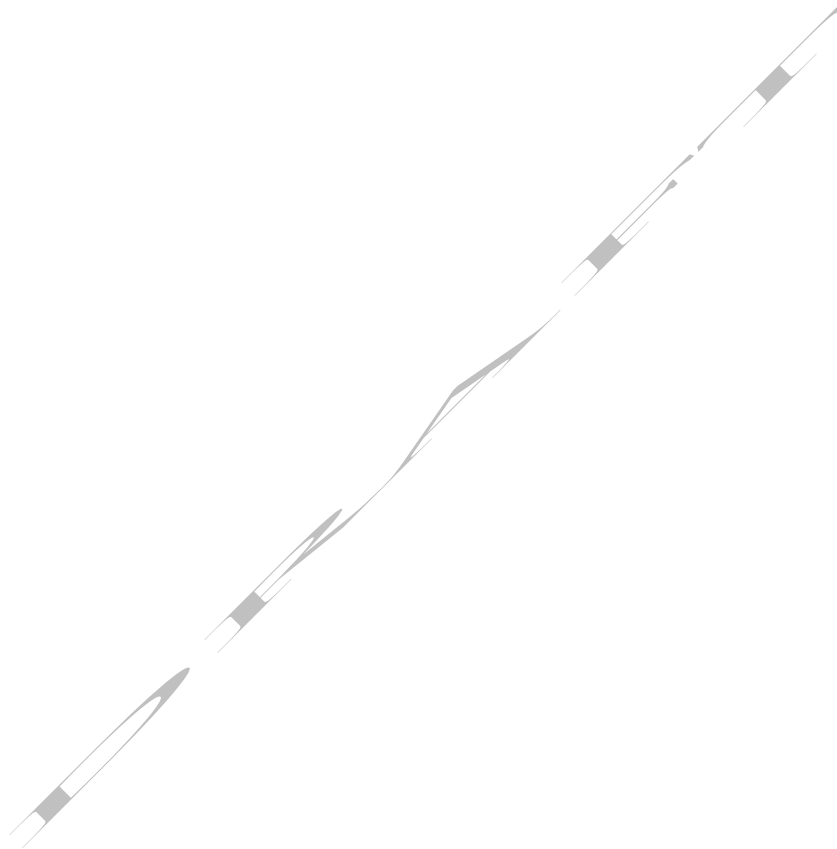
Citizen/PAP perception survey and feedback: In addition to the feedback space on the MOCI website sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (MOCI, 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 Ministry 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.

Driven by the continued need to observe COVID-19 considerations and restrictions the Project will also adapt virtual communication and consultation methods taking into account social distancing requirements. Hence, alternative ways will be adopted in accordance with the local laws, policies and new social norms in effect to mitigate the virus transmission, as well as relevant WHO guidelines.



4.4 Proposed strategy to incorporate the view of vulnerable groups

The project will take special measures to ensure that disadvantaged and vulnerable groups have equal opportunity to access information, provide feedback, or submit grievances. The deployment of the 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;
- People with disabilities: 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 ITC literacy: provide information through flyers and brochures, media and social media announcements,
- Children – though educational facilities and parents conduct a safety awareness campaign for children to understand elevated risks associated with RLC while physical interventions are ongoing.

4.5 Review of comments

The comments on all disclosed data and ESF documents will be reviewed immediately upon arrival by the PIU E&S specialists. 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.

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 specialist will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan. 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 engagement implementation plans

The PIU will based on the procurement plan develop annual stakeholder implementation schedule. The schedule will be based on a screening to ensure relevant information that may be useful to understand the characteristics of people/communities that will be impacted by the project is included. This may for instance be: environmental data, census data, socio-economic data (gender data etc. and their implications from an environmental and/or social point of view will be explained. The Project

description shall be kept targeted and relevant to understand the types of stakeholder groups impacted by the project.

A detailed overview of key issues raised in previous stakeholder engagement activities and how early stakeholder input has influenced project design shall be included in the plan. Lessons learned on any prior stakeholder engagement activities from past projects or ongoing similar projects shall be taken into account and described as relevant.

Each time the annual schedule is prepared the list of identified stakeholders and their analysis will be revisited and will ensure that those (i) that are affected or likely to be affected by the project (project-affected parties); and (ii) May have an interest in the project (other interested parties) are adequately identified. Some groups may be interested in the project because of the sector it is in (i.e. rail sector), and others may wish to have information simply because public finance is being proposed to support the project. It is not important to identify the underlying reasons why people or groups want information about a project—if the information is in the public domain, it should be open to anyone interested.

The implementation schedule will include advertisement of local grievance entry points as part of the awareness building campaign. Commitments to releasing routine information on the project's environmental and social performance, including opportunities for consultation and how grievances will be managed shall be made.

The drivers of vulnerability will be in details assessed and identified during development of sub-projects, building upon the groups identified hereunder. The following can help outline an approach to understand the viewpoints of these groups:

- Identify vulnerable or disadvantaged individuals or groups and the limitations they may have in participating and/or in understanding the project information or participating in the consultation process.
- What might prevent these individuals or groups from participating in the planned process? (For example, language differences, lack of transportation to events, accessibility of venues, disability, lack of understanding of a consultation process).
- How do they normally get information about the community, projects, activities?
- Do they have limitations about time of day or location for public consultation?
- What additional support or resources might be needed to enable these people to participate in the consultation process? (Examples are providing translation into a minority language, sign language, large print or Braille information; choosing accessible venues for events; providing transportation for people in remote areas to the nearest meeting; having small, focused meetings where vulnerable stakeholders are more comfortable asking questions or raising concerns.)
- If there are no organizations active in the project area that work with vulnerable groups, such as persons with disability, contact medical providers, who may be more aware of marginalized groups and how best to communicate with them.
- What recent engagement has the project had with vulnerable stakeholders and their representatives?

A summary of stakeholder needs will be identified readying inter alia on the drivers of vulnerabilities but also other barriers requiring adaptation of the common communication and engagement tools.

A Strategy for Consultation will be adopted with methods varying according to targeted audience (e.g. interviews surveys, public meetings, participatory methods). A strategy to incorporate the view of vulnerable groups and how the views of vulnerable or disadvantaged groups will be sought will be developed.

Details of what resources will be devoted to managing and implementing the Stakeholder Engagement Plan and what budget is allocated to ensure implementation including the monitoring and evaluation activities will demonstrate the capacity and commitment to implement the SEP and activities thereunder.

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 4: Tentative budget Categories for effective implementation of engagement activities

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

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 5: Management functions and responsibilities

Actor	Stakeholder engagement responsibilities
Ministry for Capital Investments	<ul style="list-style-type: none"> ▪ 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	<ul style="list-style-type: none"> ▪ 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 Consultant hired by PIU	<ul style="list-style-type: none"> ▪ 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
Local Governments	<ul style="list-style-type: none"> ▪ 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

The implementing agency (MOCI) does not have a grievance system in place and is using an ad hoc approach for any grievance that arrives using exiting contact information. Hence, Project level grievance mechanism (GM) will be established under the WBTF.

The GM will consist of a Central Feedback Desk (CFD) established and administered by the PIU with Sub-Project specific Local Grievance Admission Desks (LGAD) (collectively referred to as Grievance Mechanism (GM)). The administration remit will reside with the MOCI and its PIU. The LGAD shall serve as local admission point for uptake of grievances and acknowledgment of grievance receipt through local avenues

MOCI will adopt a Grievance Mechanism and will inform all 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 MOCI <https://www.gov.me/mki>
- The website/social media managed by City of Podgorica <https://podgorica.me/>
- The website/social media managed by Municipality Bar <https://bar.me/>
- The notice boards (and frequently visited places) of local communities impacted by the Project – Bozaj, Podgorica (settlements Vukovci, Moraca and Bistrica) and Bar (Virpazar and Zutokrlica),
- Through social media campaigns.
- the website of the border/customs authority
- at border crossing points
- 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 MOCI via the same means as grievances (see section below). Once received they will enter into MOCI 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 acting 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 MOCI (collectively referred to as Grievance Mechanism). A separate workers’ Grievance Mechanism will be established and will be operated by MOCI Human Resources Department and will be separate from the public grievance mechanism.

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 GM outreach campaigns, MOCI 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 (hotline, 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 have 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 smallscale 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 Capital Investments

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

Att. Mr. Vladimir Raković

grievance@MoCI.gov.me

Address: IV proleterske 19,

81100 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.

5.2 The Procedure

1. In some instances, such as when a complaint is more of a question or request for information, MOCI 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.
- MOCI 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

- MOCI 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 MOCI or from contractors.
- The MOCI 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 MOCI will discuss the results and proposed resolution with the complainant, including a timeline for implementation.
- The MOCI will implement the resolution either directly or through a third party, which will be done in consultation with the complainant.
- The MOCI will review complaints regularly to ensure progress is being made towards resolution. If no progress is being made, the MOCI may decide to escalate the complaint to MOCI 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 MOCI will close the grievance.
- In case of anonymous grievance the final decision will be disclosed on the MOCI website.
- The MOCI 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 MOCI 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 MOCI may re-open the complaint if the complainant provides new information.
- The MOCI may contact the complainant after closure to ensure no other problems have arisen.

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

- The MOCI 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 MOCI. 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.

6.1 Raising grievances

Effective grievance administration strongly relies on a set fundamental principle designed to promote the fairness of the process and its outcomes. The grievance procedure shall be designed to be accessible, effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the GM personally or by telephone or in writing by filling in the grievance form by phone, e-mail, post, fax or personal delivery to the addresses/numbers to be determined. 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.

6.2 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 (MOCI). 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.

6.3 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 MOCI website. The updates shall be disaggregated by gender, type of grievances /complaints and updated regularly.

6.4 Grievance log

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

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

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

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

6.5 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.

6.6 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>

8. MONITORING AND REPORTING

MOCI 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..**

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

Indicator	How will it be monitored	Responsibility	Frequency
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			
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,	Grievance Log	PIU's Social Specialist,	Quarterly

Indicator	How will it be monitored	Responsibility	Frequency
(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 Focal Point	
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, MOCI 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 and 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 MOCI 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;

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 and construction (Official Gazette No. 064/17, 044/18, 063/18 and 011/19)	The Law on Spatial Planning and Construction defines the process of adoption of the planning documents for construction of facilities (spatial plans). 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)	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)	The Law on nature protection defines general provisions on nature protection objectives conservation of biodiversity and sustainable management of living natural resources.

	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.

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 _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> 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)	<input type="checkbox"/> By Post: Please provide mailing address: _____ <input type="checkbox"/> By _____ Telephone: _____ <input type="checkbox"/> By _____ E-mail _____ <input type="checkbox"/> I don't wish to be contacted and will follow up on the resolution on the MOCI website
Preferred Language for communication	<input type="checkbox"/> Montenegrin <input type="checkbox"/> 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	<input type="checkbox"/> One time incident/grievance (date _____) <input type="checkbox"/> Happened more than once (how many times? _____) <input type="checkbox"/> On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	
Signature: _____ (not required in case of anonymous complaints) Date: _____	
Please return this form to: Ministry of Capital Investment To the attention of the CGD Address: IV proleterske 19, 81100 Podgorica	

ANNEX 4: PUBLIC GRIEVANCE LEAFLET

MoCI 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 MoCI (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 Capital Investments

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

Att. Mr. Vladimir Raković

Address: IV proleterske 19,

81100 Podgorica

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain Confidential, MoCI 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:

