A scaffolding on a house

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EDUCATION ENERGY EFFICIENCY PROJECT IN MONTENEGRO

STAKEHOLDER ENGAGEMENT PLAN

AUGUST 2024

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| --- | --- |
| Client: | European Bank for Reconstruction and Development (EBRD) |
| Project: | Education Energy Efficiency Project in Montenegro |
| Document: | Stakeholder Engagement Plan |
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List of Abbreviations

|  |  |
| --- | --- |
| ACM | Asbestos-Containing Materials |
| EBRD | European Bank for Reconstruction and Development |
| GBVH | Gender-based Violence and Harassment |
| Ministry | Ministry of Education, Science and Innovation |
| NTS | Non-technical Summary |
| SEP | Stakeholder Engagement Plan |
| PIU | Project Implementation Unit |
| PR | (EBRD’s) Performance Requirement |
| EE | Energy Efficiency |
| RE | Renewable Energy |

Brief Glossary of Stakeholder Engagement

This **one-page glossary provides definitions for some of the most important concepts used in this Stakeholder Engagement Plan**, although it is by no means an exhaustive list.

| **Glossary term** | **Definition/ Description** |
| --- | --- |
| **Stakeholders** | Stakeholders are those:   1. who are affected (directly or indirectly, positively or negatively) by a project, including those who might be particularly *vulnerable* to project impacts 2. who may have an interest in, or may otherwise influence, the project, but are not affected by it |
| **Stakeholder mapping** | Involves identifying all individuals, groups and organisations that are affected by a project or otherwise have an interest in the project, along with their needs, interests and concerns. Engagement planning is tailored to stakeholders’ needs and interests and is prioritised on those who are most affected by the project, particularly vulnerable to project impacts, and/or have a high degree of influence over project outcomes. |
| **Stakeholder engagement** | Refers to the ways in which an organisation communicates and interacts with local communities and other stakeholders and involves them in decision-making and project implementation. Engagement is a two-way or multi-way process, with the aim of listening, building trust, reaching common understanding and generating mutual benefit. |
| **Stakeholder Engagement Plan (SEP) – *this document*** | A plan which sets out the requirements and steps needed to identify, consult, and engage with stakeholders and disclose project information, to meet project objectives and the expectations of stakeholders. EBRD projects need to disclose a public SEP that meets the requirements of EBRD’s Environmental and Social Policy. |
| **Grievance mechanism** | A non-judicial process managed by the project implementor for receiving, acknowledging, investigating and responding to Project-related grievances. The mechanism should not affect a complainant’s access to judicial or administrative remedies. A community grievance mechanism is usually separate from an employee grievance mechanism.  *See Chapter 5 for details about the grievance mechanism.* |
| **Vulnerable people or groups** | People or groups of people who may be more adversely affected by project impacts than others by virtue of characteristics such as their gender, ethnicity, religion, age, physical or mental disability, literacy, social status, etc. Vulnerable people may also include people in vulnerable situations, such as people living below the poverty line, single-headed households, natural resource dependent communities, internally displaced people, etc. |

# Introduction

## Project Context

**Context.** EBRD is considering providing a sovereign loan to the Government of Montenegro for financing energy efficiency (EE), renewable energy (RE), accessibility and safety enhancements in 24 educational buildings (two kindergartens, 18 primary schools, three secondary schools and one university dormitory) in 10 cities in Montenegro (the “Project”):

1. Bar
2. Budva
3. Gusinje
4. Herceg Novi
5. Kotor
6. Niksic
7. Podgorica
8. Rozaje
9. Tivat
10. Zabljak

These enhancements will be managed by the Ministry of Education, Science and Innovation (“the Ministry”).

Project buildings are spread throughout entire Montenegro, covering both the continental and coastal regions of the country. Municipalities and cities where the Project buildings are located are shown in Figure 1 below.

A map of the world

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Figure 1: Municipalities/cities where the Project buildings are located

**Project benefits.** The implementation of the Project is expected to deliver several environmental and social (E&S) benefits, such as reduced energy consumption and greenhouse gas emissions, improved indoor comfort, increased resource efficiency, and lowered operating costs. Additionally, the Project will enhance the safety of buildings through planned non-energy efficiency (non-EE) measures, generate local employment opportunities, and contribute to the goals outlined in Montenegro's Nationally Determined Contribution and strategic documents, primarily Climate Change Strategy and Energy Development Strategy.

**Categorisation.** The Project is categorised “B”[[1]](#footnote-2) in accordance with EBRD’s Environmental and Social Policy 2019.

**Implementation arrangements.** The Ministry of Education, Science and Innovation will be responsible for the preparation and implementation of the Project. The Project will be managed by a Project Implementation Unit (PIU), consisting of Ministry representatives. The PIU will be responsible for entire Project implementation including stakeholder engagement. A PIU Support Consultant will be engaged to provide expertise in tendering procedures, E&S monitoring and overall Project reporting.

**Project development status.** The Project is currently in its preparatory phase. During 2024, the EBRD funded the implementation of EE audits and the development of a Feasibility Study for the 24 educational buildings. The Main Designs for the Project is yet to be developed.

In 2024, an independent E&S assessment of the Project was undertaken by independent consultants commissioned by EBRD. This Stakeholder Engagement Plan is part of the Project’s disclosure package developed during the assessment, together with the Non-technical Summary which provides a more detailed description of the Project.

**Project measures.** In the 2024 Feasibility Study, the following measures are proposed for implementation:

|  |  |
| --- | --- |
| **Code** | **EE and RE measures** |
| ***M1*** | External wall insulation |
| ***M2*** | Roof insulation |
| ***M3*** | Openings replacement |
| ***M4*** | Lighting system replacement |
| ***M5*** | Heat pump installation |
| ***M6*** | New pumps (circulators) installation |
| ***M7*** | Thermostatic radiator valves installation |
| ***M8*** | Photovoltaic system installation |
| ***M9*** | Boiler upgrade |
| ***M10*** | Solar collector installation |
| ***M11*** | Building Management System installation |
| ***M12*** | Water savings measures |
| **Non-EE measures** | |
| ***M13*** | Accessibility ramps |
| ***M14*** | Electrical system renovation |
| ***M15*** | Fire system improvement |
| ***M16*** | Removal of asbestos-containing materials |
| ***M17*** | Structural strengthening |

A list of proposed measures per each building is provided below

Table 1: Proposed measures for each Project building

*Note: Each measure is marked with an abbreviated code from the table above.*

| **City/**  **Municipality** | **Project building** | **M1** | **M2** | **M3** | **M4** | **M5** | **M6** | **M7** | **M8** | **M9** | **M10** | **M11** | **M12** | **M13** | **M14** | **M15** | **M16[[2]](#footnote-3)** | **M17** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| ***Bar*** | Primary school "Blazo Jokov Orlandic” |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Meksiko“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Secondary school "Gimnazija Niko Rolovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Kekec” |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Budva*** | Primary school "Stefan Mitrov Ljubisa“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Kindergarten "Ljubica V. Jovanovic - Mase“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Gusinje*** | Primary school "Dzafer Nikocevic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Herceg Novi*** | Primary school "Milan Vukovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Kotor*** | Primary school "Narodni heroj Savo Ilic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Secondary schools Gimnazija and Srednja pomorska skola |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Nikola Djurkovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Niksic*** | Primary school "Ratko Zaric“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Olga Golovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Kindergarten "Dragan Kovacevic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Luka Simonovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Pavle Kovacevic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Podgorica*** | Primary school "Pavle Rovinski“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Sutjeska“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Primary school "Dr Dragisa Ivanovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| University dormitory Podgorica (a) – Dom I |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| University dormitory Podgorica (b) – Dom II |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| University dormitory Podgorica (c) - Restaurant |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Rozaje*** | Primary school "25. maj“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Tivat*** | Primary school "Drago Milovic“ |  | *Note[[3]](#footnote-4)* |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| Mixed secondary school "Mladost” |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| ***Zabljak*** | Primary school "Dusan Obradovic“ |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

## Objectives and Scope of this Stakeholder Engagement Plan

**This Stakeholder Engagement Plan (SEP) was developed by the PIU in order to clearly communicate to all interested and affected parties its stakeholder engagement program**.

The objective of this SEP is to facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with Montenegrin legislation, as well as the requirements of EBRD.

**This SEP is a live document that will be periodically updated by the PIU** as necessary to reflect key changes in Project activities or any new developments in the Project scope.

*Note: No specific stakeholder engagement activities have yet been undertaken by the Ministry. All future activities will be guided by this SEP.*

# Regulatory Requirements for Stakeholder Engagement

## Montenegrin Requirements

The following specific laws in Montenegro with requirements regarding disclosure and transparency will be applicable to the Project:

* The *Law on Free Access to Information of Public Interest*[[4]](#footnote-5) states that public authorities are required to provide each person with the possibility of receiving and becoming acquainted with information of public interest, except in cases anticipated by law.
* The *Media Law*[[5]](#footnote-6) stipulates that public information is free and is not subject to censorship, and that the public has the right and interest to be informed on issues of public interest.

Montenegro has also ratified the Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters. The Convention applies both to government organisations but also any other natural or legal persons having public responsibilities or functions, or providing public services.

There are no other local requirements on stakeholder engagement applicable to this Project that are comparable to EBRD requirements elaborated below.

## EBRD Requirements

In its Environmental and Social Policy 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (Information Disclosure and Stakeholder Engagement) emphasises the importance of open, meaningful and transparent engagement with stakeholders.

EBRD’s PR 10 requirements can be summarised as follows:

* The stakeholder engagement process involves **stakeholder identification and analysis**, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
* Clients must ensure that stakeholders have **access to** **timely, relevant and understandable information**, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
* The client will undertake **meaningful consultation**, based on the nature and scale of the project’s adverse risks and impacts and the level of stakeholder interest.
* To respond to stakeholders’ concerns related to the project in a timely manner, the client will establish an **effective grievance mechanism** as early as possible in the project development process, to receive and facilitate resolution of stakeholders’ concerns and grievances.
* Clients are required to **develop and implement a SEP** that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.

# Project Stakeholders

Project stakeholders have been identified to address the different consultation requirements. Stakeholders include persons or groups that are:

* directly and/or indirectly affected by the Project;
* have certain interests in the Project and its activities; or
* have the ability to affect the Project itself and its final outcome.

Stakeholder mapping was carried out during the development of this SEP based on site visits to a representative sample of educational institutions, as well as discussions with the Ministry of Education, Science and Innovation.

The identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in the next chapter. It should be noted that any stakeholders not identified at this stage of the Project (such as any non-governmental organisations interested in the Project that have not been identified at this stage) may directly contact the PIU to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

1. **Students/visitors/users/staff within the educational institutions**

Relocating students/staff during construction works will largely not be feasible for most institutions involved in the Project. In fact, only a few have the capacity or conditions that make relocation a viable option, and even these cases require substantial planning and resources. Therefore, the preferred approach for most institutions will be to schedule construction works during school breaks, weekends or after hours to minimise disruptions.

Conducting construction works in the proximity of students/children and staff can pose significant health and safety risks such as the following:

* Refurbishment works involving loud machinery could elevate noise levels in and around the educational institutions.
* Dust and particulate matter from demolition and drilling could contaminate the air without effective management.
* Activities such as painting and flooring can release volatile organic compounds (VOCs) and chemical fumes.
* Unpleasant odours may arise from construction materials and processes.
* Electrical system overhauls pose risks of shocks or fires if safety protocols are not strictly followed.

Users of kindergartens and primary schools are a particularly sensitive (vulnerable) category who may have increased sensitivity to factors such as noise, dust and other challenges associated with ongoing construction activities. Construction activities may result in increased traffic congestion and closures of access paths, potentially affecting access to the educational institutions and causing inconveniences for staff, students/children and guardians. The significance of this potential risk is minimal since these facilities have multiple access paths, and construction works will be planned for periods when students are not present.

To mitigate the impact of indoor air emissions during construction works, various mitigation measures such as dust control, the use of low-VOC materials, and regular cleaning will be implemented. To enhance coordination throughout the construction period, the PIU will establish a *Communication and Coordination Procedure* to include a formal coordination procedure among construction managers and representatives of educational institutions, outlining the processes for scheduling, executing and supervising construction activities, with a special emphasis on coordinating noisy construction works; weekly meetings of educational institutions staff to discuss works planned for each week, allowing class teachers to prepare for any disruptions or relocation of students to other classrooms if feasible, and ensuring that facility’s staff are regularly informed about potential health and safety issues and providing updated on EE measures being implemented as well as instructions on handling any safety incidents related to the works. Additionally, Traffic Management Plan will be developed to mitigate traffic congestion and ensure unobstructed emergency evacuation routes.

1. **Relevant government authorities**

The process of obtaining national permits and authorisations for each building will depend on the final scope of work (to be defined after the development of the Main Designs), i.e., the categorisation of planned activities as remodelling or reconstruction. If the Project activities are confirmed as remodelling, the legal process will involve submitting applications to the Ministry of Spatial Planning, Urbanism and State Property for approval. Notifying the Administration for the Protection of Cultural Assets of Montenegro about the works (only in Kotor) will be necessary. In case of reconstruction, a more extensive set of permits and approvals will be required, including Urban-Technical Conditions, Conservation Conditions (only in Kotor), Contractor Permits, etc. No local Environmental Impact Assessment will be required.

Furthermore, for all Project buildings, it will be necessary to obtain confirmation from the competent state authorities regarding whether any of the building facades or parts of facades are subject to intellectual property rights. For those buildings determined to be under intellectual property protection, the legal process will require contacting the holders of these rights during the development of the Main Design.

1. **Contractors or subcontractors for construction, monitoring and supervision of works, and their employees**

The contractors or the supervision engineer have not been selected yet but are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the construction process.

The challenges for contractor’s workers in all Project buildings will involve general construction risks. A specific issue will be handling of asbestos-containing waste. Prior to the commencement of any works, the Ministry will therefore conduct a comprehensive asbestos-containing materials (ACM) survey at all Project buildings and prepare ACM Registers for each building. Where ACMs are identified, an ACM Management Plan will be developed where applicable.

# Stakeholder Engagement Program

Effective stakeholder engagement relies on transparent information disclosure and meaningful consultations. This section details the PIU's strategy and planned activities to keep all stakeholders informed and involved.

## Disclosure of Project Documents

The PIU will disclose the following documents as early as possible in the Project development process:

* + this SEP, the Public Grievance Leaflet (Appendix 1 of this SEP) and Project Grievance Form (Appendix 2 of this SEP), and
  + the Non-technical Summary (NTS) of the Project.

The documents will be publicly available in Montenegrin and English language in electronic and printed forms on the website of the Ministry of Education, Science and Innovation (<https://www.gov.me/mps>) and its physical address (Vaka Đurovića BB, Podgorica, Montenegro). The PIU will also ensure that all educational institutions publish the link with the documents on their websites.

After the disclosure of the documents listed above, stakeholders will have a period of 1 month to provide feedback (their opinions and suggestions with regard to the Project). To encourage feedback, the PIU will (in parallel with disclosure) publish on the Ministry’s website and ensure that all educational institutions publish on their websites a notification with the contact person details of the PIU, as well as the timeframe for sending feedback. PIU contact information is provided in Chapter 5 of this SEP.

All comments and proposals will be considered by the PIU. A brief report (“comments matrix”) on comments/proposals received and responses from the PIU will be published on the Ministry’s website following the public review period.

## Informing the Public About Construction Works

The PIU will commit to providing clear information about the planned construction activities. This will be ensured through publication of a notice detailing the start and duration of the works, accompanied by the Public Grievance Leaflet and the Project Grievance Form, at least 30 days before the start of works through:

* + the websites of the Ministry and the involved educational institutions
  + displaying the notice at the entrances to the educational institutions and the reception counter of the University dormitory Podgorica
  + displaying the notice at the entrances of spaces that educational institutions lease to business users and/or sending the notice to business users by email or post.
  + publication in the media.

## Engagement Objectives and Methods

The list of identified stakeholders and specific communication requirements are provided in the table below.

As noted previously, this list of stakeholders below may not be final, and any stakeholders not identified at this stage of the Project may directly contact the PIU to make themselves and their needs and interests known. The SEP will be updated accordingly by the PIU. Suggestions for improvement of proposed communication methods are also welcome and can be sent to the PIU which is open to feedback from stakeholders.

*Table 2: Engagement objectives and methods*

| **Identified stakeholder** | **Specific issues or interests** | **Communication and engagement methods** | **Information to be disclosed** |
| --- | --- | --- | --- |
| **Students/visitors/users/staff within educational institutions** | Construction-related concerns related to the health and safety of students/visitors and health workers if not properly managed, such as air contamination from demolition and drilling operations, heightened noise levels within the educational institutions due to loud machinery and works, unpleasant odours or electrical accidents during overhauls of electrical distribution systems. | * Access to Project documents online and in printed form, and opportunity to provide feedback to the Project documents * Meetings of educational public institutions staff to discuss works planned for each week, allowing class teachers to prepare for any disruptions and organise online classes promptly and relocate users to other classrooms * Ensuring that each facility’s staff are regularly informed about potential H&S issues and providing updated on EE measures being implemented as well as instruction on handling any safety incidents related to the works in line with the Communication and Coordination Procedure to be established for the Project by the PIU * Notice detailing the start and duration of the works and containing information on the grievance mechanism displayed at the entrances to the educational institutions and the reception counter of the University dormitory Podgorica * Responding to inquiries/ grievances through the Project grievance mechanism (see Chapter 5) * Information boards (including information on grievance mechanism) to be placed by the contractor at Project building entrance | * Project disclosure package (SEP, NTS, Public Grievance Leaflet, Grievance Form) and comments matrix published on the Ministry website * Information provided to educational institution staff about potential H&S issues and updates on EE measures being implemented as well as instructions on handling any safety incidents related to the works * Information on the extent, timing and duration of planned works * Information on grievance mechanism |
| **Relevant government authorities** (Ministry of Spatial Planning, Urbanism and State Property – Directorate for Inspection Supervision and Licenses; Administration for the Protection of Cultural Assets in Kotor) | Issuing permits, consents and opinions in accordance with national legislation, control of compliance with national legislation | * Official communication channels * Consultations with government authorities in the framework of permitting procedures * Monitoring based on national legislation requirements | * Information on Project activities, permitting requirements, monitoring/audit reports, other national legislation requirements and relevant information |
| **Contractors or subcontractors for construction, monitoring and supervision of works, and their employees** | Health and safety; implementation of Asbestos-Containing Material Management Plans in relevant buildings, labour and working conditions; environmental setting and impacts | * Regular communication with representatives of educational public institutions (school principals, secretaries, etc.) * Information through contracting * Toolbox talks at construction sites on gender-based violence and harassment (GBVH), health and safety topics * Workers’ grievance mechanism | * Coordination procedure among construction managers and representatives of educational public institutions (school principals, secretaries, etc.) * Work safety and health regulations, environmental protection requirements * Information on workers’ grievance mechanism |

# 

# Grievance Management

**Overview**

The PIU is striving to ensure that the implementation of the Project will not result in adverse impacts for students, visitors, educational institutions staff or for other potentially affected stakeholders. The PIU understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A Project-level grievance mechanism has been set up as a process for receiving, evaluating and addressing grievances. The PIU will implement the mechanism to ensure that it is responsive to any concerns and complaints. The mechanism will address concerns promptly and effectively in a transparent manner, free from manipulation, interference, coercion, discrimination, intimidation and retaliation, and it will be accessible to all affected parties, at no cost.

This chapter includes the following supporting appendices:

* + Text for Public Grievance Leaflet (Appendix 1),
  + Project Grievance Form (Appendix 2) and
  + Template of the Grievance Registry (Appendix 3).

The following sections of this chapter elaborate the Project grievance procedure and steps. A separate grievance mechanism is available for workers.

**Visibility of the grievance mechanism**

The visibility of the grievance mechanism will be ensured through:

* + As early as possible in the Project development process: disclosing the Public Grievance Leaflet and Project Grievance Form through the websites of the Ministry and the involved educational institutions.
  + Prior to the start of construction: ensuring that all educational institutions prominently display a notice detailing the start and duration of the works on their main entrances, as well as the Public Grievance Leaflet and Project Grievance Form.
  + Once construction starts: placing information boards (by the contractor) at educational institutions entrances to clearly display PIU contact information for grievances.

**Submitting grievances**

Any concerns can be brought to the attention of the PIU verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail to the address/number given below). Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of construction works, the Project Grievance Form may also be submitted directly to the contractor or the supervision engineer, which will forward any such received grievances to the PIU without delay (within 24 hours)to allow PIU to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below).

**Recording and acknowledging grievances**

The PIU will record all grievances in the Grievance Registry. Written and non-anonymous grievances will be acknowledged within 5 calendar days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

* description of grievance, including an indication of the **type (topic) of the grievance** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as:

1. grievances related to any gender-based violence and harassment
2. grievances related to other construction nuisances such as improper waste management, noise dust, etc.

* details about the **complainant profile**, to understand who and where is most affected by negative impacts of the Project (*note: this information will be considered confidential and only disclosed to PIU staff working on grievances*)
* **date of receipt** of grievance and **date of acknowledgement** returned to the complainant
* **description of actions** taken (investigation, corrective measures, preventive measures)
* **date of resolution and closure**/provision of feedback to the complainant

**Assisting complainants**

If the grievance is vague and not clear enough, the PIU will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by the PIU, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

**Grievance resolution**

The PIU will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If the PIU is not able to address the issues raised by immediate corrective action, a long-term corrective action may be identified if relevant. The complainant will be informed about the proposed immediate action or any long-term action within 10 calendar days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant. The PIU will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

If the PIU is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/justification on why the issue was not addressed. The response will also contain, if relevant, an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

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

PIU contact information is:

**Education Energy Efficiency Project in Montenegro - Project Implementation Unit**

Email: kabinet@mpni.gov.me

Tel: +382 20 410 100

Address: Vaka Đurovića BB, 81000 Podgorica

Website: www.gov.me/mps

**EBRD’s Independent Project Accountability Mechanism**

In addition to the Project-level mechanism managed by the PIU, the EBRD’s Independent Project Accountability Mechanism[[6]](#footnote-7) (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

# Monitoring and Reporting

The results of the stakeholder engagement process will be included in **Environmental and Social Reports to EBRD** which will be prepared by the PIU, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance, and implementation of the external grievance mechanism.

The reports will include, in particular, the following information:

* **Number and types (topics) of received grievances** raised in the reporting period by **type (topic) of the grievance** to enable timely detection of most frequent incidents, ascertain trends and manage risks – such as: grievances related to any gender-based violence and harassment, grievances related to other construction nuisances such as improper waste management, noise, dust, etc.
* **Number and types of information disclosure and engagement activities** through all channels, with information on issues and concerns raised and information on how the issues raised were taken into consideration by the PIU.

The PIU will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the implementation and updating of this SEP and reporting to EBRD.

# Appendices

## Appendix 1: Text for Public Grievance Leaflet

The Project Implementation Unit (PIU) is striving to ensure that the establishment and development of the **Education Energy Efficiency Project in Montenegro** will not result in adverse impacts for students/visitors/users/staff within the Project buildings. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities.

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

* Increased noise, access issues or other nuisances during construction works within the Project buildings
* Concerns about the environment or health and safety issues due to improper waste management, noise or dust around or near educational institutions
* Practices that endanger the health, safety and security of employees working on the Project
* Inadequate implementation of the Project’s Stakeholder Engagement Plan by the PIU

**How can I submit a grievance?** Anyone can submit a grievance to the PIU (contact information given below) or the contractor/supervision engineer (once construction starts) without any costs incurred to the complainant, in the following ways:

1. verbally (in person or by telephone)
2. in writing by filling in the attached Project Grievance Form or in other form if preferred, and sending it by personal delivery, post or e-mail

**Contact information:**

**Education Energy Efficiency Project in Montenegro - Project Implementation Unit**

Email: kabinet@mpni.gov.me

Tel: +382 20 410 100

Address: Vaka Đurovića BB, 81000 Podgorica

Website: www.gov.me/mps

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, the PIU will ensure that your name and contact details are not disclosed without your consent and only the PIU team directly working on 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 PIU deal with my grievance?** The PIU will go through the following steps to deal with your grievance:

* + 1. The PIU will contact you (if you submitted a non-anonymous grievance) to acknowledge your grievance within 5 calendar days. It will include your grievance reference number as recorded in the Grievance Registry, the person responsible for tracking your grievance and his/her contact information. If the grievance is vague and not clear enough, the PIU will assist you and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer.
    2. The PIU will make all reasonable efforts to address the complaint and will set up an investigation into your grievance. We may need to contact you during this step for further information.
    3. You will be contacted within 10 calendar days upon the acknowledgement of grievance. If the investigation finds that your grievance is justified, we will notify you of the immediate corrective action undertaken or potentially the identified long-term corrective action if relevant. If the grievance does not relate to the Project activities or that no relevant national and international standards have been breached in relation to the grievance or if we are not able to address the issue you raised, we will explain this to you in writing.
    4. The PIU may contact you at a later stage to check that the Project activities pose no further problems.

## Appendix 2: Project Grievance Form

|  |  |  |
| --- | --- | --- |
| **Reference Number** |  | |
| **Full name (optional)**   * I wish to raise my grievance anonymously. * I request that you do not disclose my identity without my consent. |  | |
| **Contact information**  **Please mark how you wish to be contacted (mail, telephone, e-mail).** | By Post: Please provide mailing address:  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  By Telephone: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  By E-mail: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ | |
| **Preferred language of communication** | - Montenegrin  - English (if possible)  - Other \_\_\_\_\_\_\_\_\_\_ | |
|  | | |
| **Description of Incident for Grievance** | | What happened? Where did it happen? Who did it happen to? What is the result of the problem? |
|  | | |
| **Date of Incident / Grievance** |  | |
|  | * One-time incident/grievance (date \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_) * Happened more than once (how many times? \_\_\_\_\_\_) * On-going (currently experiencing problem) | |
|  | | |
| **What would you like to see happen?** | | |
|  | | |

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

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

*Please return this form to:*

***Education Energy Efficiency Project in Montenegro***

***Project Implementation Unit***

*Email: kabinet@mpni.gov.me*

*Tel: +382 20 440-100*

*Address: Vaka Đurovića BB, 81000 Podgorica*

*Website: www.gov.me/mps*

## Appendix 3: Grievance Registry – Template

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

|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Name of complainant | Complainant profile | Contact information | Date received | Date acknowledged | Type (topic) of problem | Responsible teacher class or class section | Grievance description | Proposed corrective action (immediate or long-term) | Due date for action | Results of action | Date of closure | Grievance follow-up | Recurrence (Y/N) | Notes |
|  | *Enter name or ‘anonymous’* |  |  |  |  | *E.g., noise, dust, gender-based violence and harassment* |  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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1. An EBRD project is categorised B when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures. [↑](#footnote-ref-2)
2. This measure may be applicable to other buildings as well, as to be determined after a comprehensive survey is conducted for all buildings during the pre-construction phase. [↑](#footnote-ref-3)
3. This measure was initially included for this school per the Feasibility Study. However, a public procurement announcement for roof repair was announced in March 2024. Therefore, it is reasonable to assume that M2 will not be implemented in this school as initially planned. [↑](#footnote-ref-4)
4. *Official Gazette of Montenegro, no. 044/12 and 030/17* [↑](#footnote-ref-5)
5. *Official Gazette of Montenegro, no. 82/20* [↑](#footnote-ref-6)
6. Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html> [↑](#footnote-ref-7)