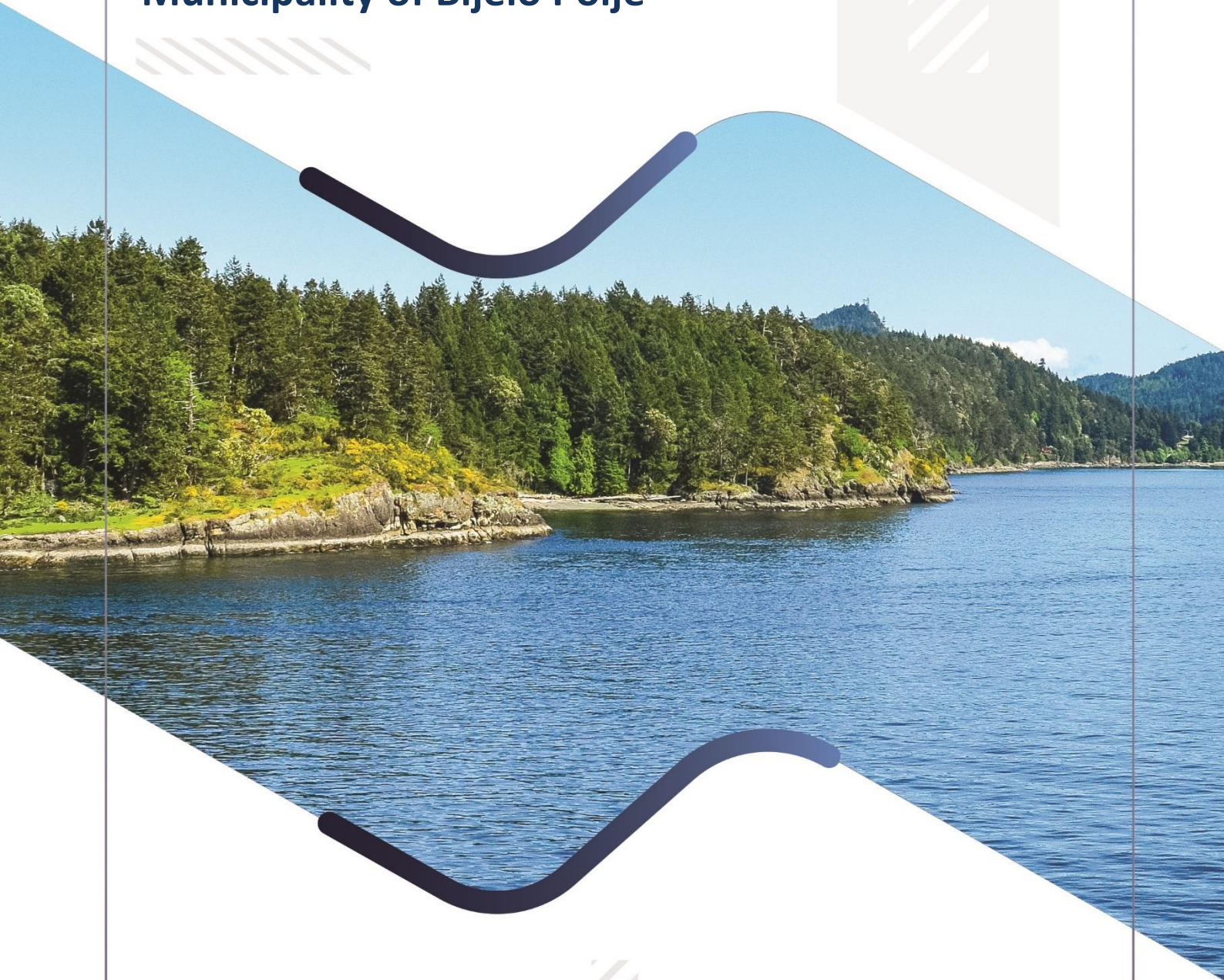


Sava and Drina River Corridors Integrated Development Program

Sub-project: Infrastructure works on the construction of the embankments at the Grncar and Lim rivers

Resettlement Review and Audit Report for Municipality of Bijelo Polje



May 2022

Client: Ministry of Agriculture, Forestry and Water Management

Project: Sava and Drina River Corridors Integrated Development Program (SDIP)

Document: Resettlement Review and Audit (RRA) Report

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Abbreviations

Administration	Administration for Cadaster and State Property of Montenegro
Commission	Commission for valuation of property (established by the Administration for Cadaster and State Property Administration)
ESS	Environmental and Social Standards of the World Bank
HH	Household
Ministry	Ministry of Agriculture, Forestry and Water Management
Municipality	Municipality of Bijelo Polje
PAP	Project Affected People
PIU	Project Implementation Unit
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
RRA	Resettlement Review and Audit
SEP	Stakeholder Engagement Plan
SDIP	Regional Sava and Drina River Corridors Integrated Development Program
WB	World Bank

1 THE PROJECT

The World Bank (WB) is providing finance to the Regional Sava and Drina River Corridors Integrated Development Program (SDIP) aimed at improving flood protection and enable transboundary water cooperation in the Sava and Drina Rivers Corridors. The SDIP will be implemented over the period of the next 10 years on the territory of Montenegro, Bosnia and Herzegovina and Serbia. Specifically, the sub-component of the program which will be implemented in Montenegro is aimed to improve watershed management in the Lim and Grncar River basins of Montenegro, as well as works related to flood protection measures within the Lim River Basin to mitigate flood risks and promote sustainable use of natural resources (the Project). This includes Project works in Berane, Bijelo Polje, Plav and Gusinje. The Project is implemented by the Ministry of Agriculture, Forestry and Water Management (the Ministry) and its dedicated Project Implementation Unit (PIU).

A Resettlement Policy Framework for Montenegro (RPF) was developed for the purposes of the Project in early 2020, in order to clarify the resettlement principles, organizational arrangements, and design criteria to be applied to subprojects during Project implementation, taking into account:

- > the legislation in force in Montenegro, and
- > The World Bank Environmental and Social Framework, specifically its Environmental and Social Standard 5: “Land Acquisition, Restrictions on Land Use and Involuntary Resettlement” (ESS5)¹.

The RPF foresees the preparation of Resettlement Action Plans (RAPs), with the aim to satisfy the provisions of ESS5 and the requirements of local legislation regarding land acquisition.

¹ Available in English at: <http://pubdocs.worldbank.org/en/837721522762050108/Environmental-and-Social-Framework.pdf>

2 ABOUT THIS RESETTLEMENT REVIEW AND AUDIT REPORT

2.1 Purpose

As mentioned previously, an RPF was developed for the purposes of the Project but a Resettlement Action Plan in line with ESS5 was not prepared prior to the start of the land acquisition process. The reason why a RAP was not developed was because there was a change in the composition of the PIU, and there was no adequate communication with the Municipality of Bijelo Polje (Municipality), which in the meantime initiated the process of land acquisition. Considering this situation, and taking into account that land acquisition activities have already been completed² at approx. 99%, WB agreed with Ministry and PIU that a Resettlement Review and Audit (RRA) should be developed. The RRA was prepared in the period March -April 2022 with the purpose of documenting the results of an assessment of the land acquisition process implemented by the Municipality for construction of the embankment on Lim River and obtaining an overall understanding of the process conducted to date.

This RRA is intended to demonstrate compliance of the process with WB Environmental and Social Framework, specifically ESS5, as well as to present the results of the land acquisition process in relation to the socio-economic impacts on the Project Affected Persons (PAP). It also identifies gaps and recommends corrective actions to address such gaps.

2.2 Activities Conducted by the Consultant

The tasks conducted during the development of this RRA included:

1. **Review of available documentation:**
 - > RPF approved by WB in February, 2020;
 - > Stakeholder Engagement Plan (SEP) approved by WB in February, 2020;
 - > Set of documents delivered by the Municipality related to land acquisition:
 - Decision on Adoption of Amendments to the Detailed Urban Plan of the “Central Zone” Bijelo Polje³
 - Expropriation Study⁴,
 - Land acquisition data for Bijelo Polje (Excel file),
 - Report of property valuation (by official court experts)⁵,
 - Proposals for expropriation (sent by Municipality of Bijelo Polje to the Administration for Cadaster and State Property– Regional Unit of Bijelo Polje),
 - Individual invitations to owners/users of affected land plots and auxiliary structures (sent by the Administration for Cadaster and State Property– Regional Unit of Bijelo Polje),
 - Minutes of Oral Hearings at which owners/users were individually informed about the expropriation process and the estimated value of their affected assets,
 - Decisions on expropriation (issued by Administration for Cadaster and State Property– Regional Unit of Bijelo Polje), and
 - Evidence of payment of compensation.
2. **Analysis of legislation** governing land acquisition in Montenegro
3. **Communication with the Municipality** to obtain answers to a list of questions on the conducted process

² Most of the land acquisition activities, conducted by the Municipality, started and ended in the second half of 2021. Compensation in all cases, except one for which court proceeding is pending, was paid by February 2022.

³ Official Gazette of Montenegro - Municipal Regulations, No. 11/18.

⁴ Prepared by “GEOMONT CONSULTING” d.o.o. Bijelo Polje, December 2020.

⁵ The Report of property valuation was prepared on August 18, 2021 by a Commission composed of five members.

4. A socio-economic survey conducted by the Consultant for the purpose of development of this RRA in order to obtain basic socio-economic data and information related to the results of the conducted land acquisition process, as well as the PAP level of satisfaction with this process.
5. Preparation of a census database with data on all affected land plots, indicating the percentage of land loss – the summarized version of the database without confidential data is provided in ANNEX 1: SUMMARIZED VERSION OF THE CENSUS DATABASE CONTAINING NON-CONFIDENTIAL DATA of this RRA.

3 LEGAL REVIEW AND GAP ANALYSIS

3.1 Relevant Legislation

A summary of the key requirements of the *Law on Expropriation*⁶ is given below.

- > Types of expropriation: Outright purchases of immovable property are defined as complete expropriation. Incomplete expropriation is the instigation of an easement over property or a lease of land. Temporary occupation of land is also possible when needed for construction works.
- > Public interest and expropriation proposal: The expropriation proposal may be submitted to Administration for Cadaster and State Property (Administration) only after public interest has been declared (by law or by a decision of the Government of Montenegro)⁷. It has to include: (i) information on affected properties, (ii) proof that public interest has been declared, and (iii) proof that the entire amount of compensation has been paid to the account of the Ministry of Finance and Social Welfare in advance.
- > Negotiated settlements: The Law allows for negotiated settlements on the amount and type of compensation with property owners, until the Decision on Expropriation becomes final. In such case, the expropriation procedure is terminated⁸.
- > Decision on Expropriation: If a negotiated settlement has not been reached, Administration issues a Decision on Expropriation. The amount of compensation is specified in the Decision. Affected persons are entitled to lodge an appeal against it with the Ministry of Finance and Social Welfare. Any decisions of the Ministry may further be challenged by initiating an administrative dispute with the court.
- > Access to property: The expropriation beneficiary may acquire possession of the affected property when the Decision on Expropriation becomes final, provided that compensation has already been paid to the property owner. Exceptions are allowed for urgent cases⁹.
- > Right to request acquisition of entire assets: Landowners affected by a partial loss of their property are entitled to request complete expropriation and the corresponding compensation, in case partial expropriation would result in the owner having no economic interest in using or not being able to use the remainder of the property, that remaining part of the property will also be expropriated at his/her request. Owners must be informed of such right by the authority conducting the expropriation procedure.

⁶ Official Gazette of Montenegro, No. 55/00, 12/02, 28/06, 21/08, 30/17 and 75/18.

⁷ In this particular case, it was not necessary to make a special decision on the establishment of public interest given the fact that the implementation of this Project is defined by the Detailed Urban Plan "Central Zone" Bijelo Polje. Also, the Municipal Assembly of Bijelo Polje adopted the Decision on Amendments to the Detailed Urban Plan of the "Central Zone" Bijelo Polje.

⁸ According to the information provided by the Municipality of Bijelo Polje, no activities have been undertaken in order to reach such agreements with the owners/users of affected property.

⁹ In case of urgency for construction of a specific facility or execution of works and to avoid major damage, the Administration issues a Decision on granting authorization to the expropriation beneficiary for early entrance into possession of expropriated land even before the Decision on Expropriation becomes final and before compensation is paid. The only condition is that the Decision on Expropriation must be enforceable.

- > **Entitlements:** Persons who have formal legal rights on land and structures, as registered in the Cadastre, are entitled to compensation.
- > **Type of compensation:** Compensation is defined as “fair compensation” in cash or in kind (replacement property). When compensation is provided in cash, it is determined “in the amount of the market value of similar properties in the area, plus any losses of income during the resettlement period and relocation costs”. When compensation is provided in kind, the owner is provided with replacement property at the same value as the previous property, plus any losses of income during the resettlement period and relocation costs.
The Law regulates in detail the types of compensation for different assets (agricultural land, construction land, residential facility, commercial premises, forests, crops, etc.).
- > **Increase in compensation (for vulnerable groups):** Financial and other personal/family circumstances of the PAPs must be taken into consideration if such circumstances are “of significance to the livelihood of the owner” (large number of household members, number of household members earning income, the health status of the household members, monthly income of the household, etc.).
- > **Valuation of property:** The amount of compensation is determined by a commission established by the Administration, consisting of five members of which at least three must be court experts. The valuation methodology is defined by the Rulebook on Methodology for Assessing Property Value¹⁰.
- > **Grievances:** Affected owners may lodge administrative and judicial appeals against all decisions at many stages of the expropriation procedure.
- > **Information disclosure:** Affected owners must be informed throughout the expropriation process (e.g., the Administration has to invite PAP to a meeting before the Decision on Expropriation is passed to present any facts which may be relevant for expropriation).

3.2 Analysis of Gaps

A brief analysis of gaps between ESS5 and the *Law on Expropriation* is presented in the table below. Issues with identified gaps are marked in orange.

Table 1: Analysis of gaps

Issue	Comment
Avoiding involuntary resettlement	The Law allows the expropriation beneficiary to reach a negotiated settlement on the amount and type of compensation with property owners, until the Decision on Expropriation becomes final. If negotiated settlement is reached the expropriation procedure is terminated.
Resettlement planning and implementation	The expropriation proposal prepared by the expropriation beneficiary has to include information on affected properties, but there are no explicit requirements in the Law related to socio-economic surveys or development of resettlement plans.
Cut-off date	There are no differences with respect to determining the cut-off date or communicating it to PAP between ESS5 and the national legislation.
Timing of compensation	In general, the Law requires that compensation must be paid before the expropriation beneficiary gains access to the affected property, but it does allow early access (before compensation) in exceptional cases.
Replacement cost	The Law foresees both compensation in cash and in kind. The Law defines “compensation in kind” as replacement property plus the payment of all accompanying costs which implies replacement cost. However, the “fair compensation in cash” is the amount of the market value of the same type of property in the area (i.e., based on supply and demand in the market), increased by any losses of income during the relocation period and relocation costs. In addition, PAP are exempt from paying taxes when purchasing new property. WB defines transaction costs as including administrative charges, registration or title fees, reasonable moving expenses, and any similar costs imposed on affected persons. Therefore, since PAP are not entitled to all types of transaction costs under national Law,

¹⁰ Official Gazette of Montenegro, No. 64/18

Issue	Comment
	<p>the cash compensation is not fully compliant with the ESS5 requirement of compensation at replacement cost which would include market value plus all transaction costs.</p> <p>Note: The Law does not foresee situations when replacement cost may be determined through alternative means – it specifies that if functioning markets do not exist in the area, other markets with similar income levels per capita are to be used as a calculation basis. Therefore, no depreciation is foreseen.</p>
Eligibility for compensation (categorization)	A major gap between ESS5 and the Law is that the Law refers only to formal owners of property with no exceptions as the category of persons who are entitled to compensation.
Economic displacement	The Law recognizes the right of (formal) owners to compensation of lost income during the period of resettlement. It also stipulates that the financial and other personal/family circumstances of the previous owner must be taken into consideration if such circumstances are “of significance to the livelihood of the owner” (large number of household members, number of household members earning income, health status of the household members, monthly income of the household, etc.).
Vulnerable groups	There are no specific provisions in the Law which require consultations with and providing assistance to vulnerable groups in the expropriation process.
Grievance mechanism	While the Law does foresee the rights of affected owners to appeal at many stages of the expropriation procedure, there is no requirement for establishment of an independent grievance mechanism to process complaints related to specific projects.
Disclosure of information and consultations	Several articles of the Law stipulate notifying of/consultation with property owners.
Monitoring, evaluation and reporting	There are no legal requirements in Montenegrin legislation to monitor, evaluate or report on land acquisition.

4 DESCRIPTION OF THE LAND ACQUISITION PROCESS

4.1 Responsibility for Land Acquisition Activities

Land acquisition activities were carried out by the Municipality as the expropriation beneficiary, whereas the expropriation authority was the Administration – Regional Unit of Bijelo Polje¹¹.

4.2 Land Acquisition Procedure and Timeline

The land acquisition process was conducted in accordance with the Law on Expropriation and the Rulebook on Methodology for Assessing Property Value.

Key steps undertaken during the process are described below.

Declaration of public interest. Property can only be expropriated upon the establishment of public interest by law or by a decision of the Government of Montenegro. In this particular case, public interest was determined through the adoption of amendments to the Detailed Urban Plan “Central Zone” Bijelo Polje by the Municipal Assembly (the Law on Spatial Planning and Construction of Facilities¹² stipulate that the adoption of a planning document is equivalent to declaration of public interest for a project).

Preparation of the Expropriation Study. The Municipality hired the company “Geomont Consulting” d.o.o. Bijelo Polje, which prepared the Expropriation Study in December, 2020 for the construction of the embankment on the left bank of the Lim River.

Proposals for expropriation. The proposals for expropriation were submitted individually to all PAPs in August 2021 by the Municipal Directorate for Property and Protection of Municipal Rights to the Administration as the expropriation authority. The proposals contained data on affected property, the property owners and the purpose for which expropriation was proposed. They also contained land registry data, the proof on declaration of public interest and evidence that the required funds had been secured and deposited with the Ministry of Finance and Social Welfare. The PAP were all informed of the cut-off date when they received the proposals for expropriation. After the proposals were submitted, all PAP were then invited by the Administration for individual meetings (15 days after the delivery of the proposals) to determine the status of ownership and consult with PAP regarding the initiated expropriation procedure. The hearings were held in the premises of the Administration, in the presence of a Municipality representative.

Negotiated settlements. The Law on Expropriation allows the signing of negotiated settlements after the expropriation proposal has been submitted – the expropriation beneficiary and the property owner can agree on the form and amount of compensation, as well as the transfer of possession of real estate. Such an agreement may be signed until the Decision on Expropriation becomes final, in which case the expropriation procedure is suspended.

However, according to information provided by the Municipality, no action has been taken to conclude negotiated agreements (contracts) on compensation, and consequently no such negotiated agreements have been concluded during the process.

Decisions on Expropriation. The Administration issued the Decisions on Expropriation in October 2021 for all of the land plots (with the exception in one case where the Decision was issued in November 2021). Each Decision contained instructions on available legal remedy and gives owners the possibility to appeal against the Decision to the Ministry of Finance.

¹¹ The Cadastre and State Property Administration is the administrative body responsible for conducting the expropriation procedure, real estate appraisal and registration of rights in the land register.

¹² Official Gazette of Montenegro, No. 64/17, 44/18, 63/18, 11/19 and 82/20.

Valuation of property. According to the provisions of the Law on Expropriation, valuation of property is performed by a special Commission. The Commission is appointed ex officio by the Administration and has 5 members, of which at least three members must be court experts of appropriate professions. Valuation of property is determined in accordance with the provisions of the Rulebook for Methodology for Assessing the Value of Assets.

The Law specifies that compensation must be based on fair value of property, calculated as the market price with an increase due to lost income and relocation costs. The market value of assets is defined based on recent market transactions in the affected area (or in a relevant nearby area). Replacement cost of land must correspond to the market value of land with similar characteristics in the vicinity of affected land including transaction costs. Appraisal of plants and trees takes into account features such as their age or the resources and amount of time that would be needed to grow a new tree/plant. For example, compensation for fruit-bearing vineyards or orchards is increased by “value of undepreciated investments in such vineyards and orchards and amount of net yield lost”.

Valuation of properties was conducted by the Commission and included (i) compensation for land including all crops and trees, and (iii) compensation for auxiliary structures.

Payment of compensation. Compensation costs were borne entirely by Municipality of Bijelo Polje and were based on valuations of the above-mentioned court experts. Land acquisition costs were paid in the total amount of EUR 46,425.55.

Early entrance into possession. The Municipality has not used the possibility of early entry into possession of expropriated land before the payment of compensation, considering that construction works have not started yet. However, in 99% of the cases, the expropriation procedure has been completed and compensation has been paid. It can be reasonably concluded that by the beginning of the construction works, the expropriation process will be successfully completed and all compensation will be paid.

Assistance to vulnerable persons. According to information provided by Municipality, even though the Law on Expropriation does not require any special measures for vulnerable groups, both the Municipality and Administration representatives undertook additional efforts to provide assistance to vulnerable PAP by, e.g., providing legal advice, organizing home visits, etc.

5 SCOPE AND IMPACTS OF LAND ACQUISITION

5.1 Extent of Impacts

The total number of affected land plots is 13 of which:

- 7 privately owned land plots (owned by 20 PAP in total – owners and co-owners);
- 6 state owned land plots.

As previously stated, land acquisition activities for affected land plots have been ongoing since August 2021, and have already been completed in 99% of cases.

All land plots (private and state-owned) were affected by complete expropriation. Incomplete expropriation (instigation of easement rights) was not required.

Physical resettlement: The Project does not require the acquisition of any residential structures and therefore the physical relocation of any households.

Acquisition of auxiliary structures: A total of 17 auxiliary structures were affected by land acquisition as follows:

- 16 garages, of which 15 were built on state owned land plots and are considered as informally built structures. One garage was built on privately owned land plot as a formal structure (i.e., built with permits).
- 1 garage foundation on state owned land plot considered as an informally built structure.

The Municipality has confirmed that all these structures were compensated based on the Commission's Report on property valuation. Only one owner of an informally built garage disagreed with the estimated value, and in this particular case court proceeding is pending (more information provided in the next chapter).

The Consultant has ascertained based on the Commission's Report that the cost method was used to evaluate the value and offer compensation for these auxiliary structures. The cost method of valuing property that was used by the Commission involved an estimation based on the principle that the buyer will not pay for the asset more than it would cost him/her to acquire or build the same asset of equal value. Using this method, the costs of building the structure, obtaining the necessary documentation as well as corrections depending on the age of the structure (depreciation) were determined. The assessment of the value in this way was not in accordance with the chapter 7 of the RPF, where it is stated that depreciation will not be taken into account, and that the assessment will be made at the time of removal of facilities, otherwise inflation must be taken into account. However, depreciation was taken into account in the assessment made by the Commission, and inflation was not taken into account when determining the compensation. Therefore, it will be necessary to review the report of the Commission, and to consider paying the owners the difference in price in relation to the above.

Impacts on privately owned land plots: Approx. 99% of PAP lost only a part of their land (the percentage of partially affected land plots ranges from 0.23% to 27.94%), and only one privately owned land plot was affected entirely on which a private auxiliary structure (garage) was located. The affected private land plots are mainly yards of residential buildings located in the immediate vicinity of the project area, as well as uncultivated land near the river. Only on two affected land plots there were a few fruit trees and ornamental plants. The Consultant has ascertained based on the Commission's Report that replacement value was not paid for this land but that the comparative method (to compare similar properties on the market) was used to evaluate the value and offer compensation. However, **in view of the fact that (i) all losses were compensated for land plots and other assets, (ii) landowners were able to continue with their activities on remaining land and (iii) none of the landowners requested an increase in compensation, the Consultant considers that no further measures are needed.**

Impacts on businesses: No businesses were affected by land acquisition. However, at a distance of 50-80 meters there are several local businesses (coffee shop, markets, hotel etc.). **If certain temporary negative impacts on nearby businesses occur during the construction phase, the Municipality will need to provide compensation**

as defined in the RPF (i.e. “cash compensation for loss of income until the completion of construction works which directly impact the business operations of the business entity, in line with assessment of court experts”).

Impacts on informal users of state-owned land: Ownership of all state-owned land plots (6 in total) was granted to the Municipality as the expropriation beneficiary. Prior to this, only one state-owned plot was used informally by a private person¹³. The land plot was used by a private person who planted fruit trees, coniferous trees and other ornamental plants. All plantations have been assessed by the Commission and compensation for all plantations paid (assumably at market value). The Commission’s report has no description of the method of valuation of plantations, and the Administration (which appointed the Commission) has not been able to provide any additional information at the Consultant’s request. Therefore, **it will be necessary to reconsider the method of valuation of plantations made by Commission, and in case of non-compliance with the RPF (which requires payment of full replacement cost, i.e. the cost of re-establishing the plantation and lost income during the transition period), it will be necessary to pay the difference in compensation.**

5.2 Results of the Socio-Economic Survey Conducted

A socio-economic survey was conducted in the period from 3 March to 13 March 2022 for the purpose of development of this RRA to solicit the opinions of the PAP about Project impacts and compensation payments as well as to obtain specific data on current livelihoods and living conditions of PAP. Moreover, the aim of the socio-economic survey was to gain a good understanding of PAP level of satisfaction with the land acquisition process.

The survey and field observations were conducted by a team of trained surveyors, supervised by a field coordinator. During field visits, the surveyors were provided with:

- cadastral maps,
- a census table for data collection/verification,
- survey questionnaires prepared by land acquisition experts, and
- printed guidelines for surveying.

The residents of the Project area were notified about the survey 7 days in advance – written notifications containing information about the planned survey and the Project were posted on visible locations within the Project area. The notification contained information about the survey and the Project, and confirmation that collected data would not be publicly disclosed. The letters of notification and photographs of posted notifications are provided in ANNEX 4: NOTIFICATION OF SOCIOECONOMIC SURVEY.

Given the situation caused by the COVID-19 pandemic and respecting the prescribed measures of competent institutions to prevent the spread of the virus, the surveyors were obliged to adhere to the measures during the survey.

The surveyors personally visited the affected land plots and conducted face-to-face interviews with affected owners/users.

Before the start of the survey, **each respondent was informed that the condition to participate in survey was to sign a Statement of Consent for the Processing and Use of Personal Data**, which were intended to be collected through questionnaires. Furthermore, each respondent was made aware of his/her rights in relation to the above, as well as the fact that the statement is signed on a voluntary basis and can be withdrawn at any time.

The questionnaire and the Statement of Consent for the Processing and Use of Personal Data used for the survey are provided in ANNEX 2: QUESTIONNAIRES USED FOR PRIMARY DATA COLLECTION and ANNEX 3: STATEMENT OF CONSENT

In total, 8 PAP were contacted for the purpose of conducting the survey and were successfully surveyed.

¹³ Unfortunately, during the socio-economic survey, this person was not available and the Consultant could not obtain an opinion on the degree of satisfaction with the paid compensation.

The key results are summarized below, while the full results are available in separate Excel files which contain confidential data and information.

Key results for 8 surveyed landowners:

- Regarding **disclosure of information**, 75% of respondents were completely satisfied, while 25% were partially satisfied with the level of shared information during the expropriation process.
- All received **monetary compensation**.
- 25% stated that they were fully **satisfied with the compensation received**, while others expressed some dissatisfaction (the reason for dissatisfaction was the amount of price paid).
- 37.5% respondents stated that they used the affected land for **agricultural purposes**. All of them stated that they performed agricultural activities for their own needs.
- Salaries and pensions are the main **source of household income** for most respondents (87.5%).
- All respondents stated that expropriation did not affect their households' source of income, while one respondent emphasized that expropriation had a positive effect in terms of source of income.

6 GRIEVANCES AND DISPUTES

Disputes in line with local legislation

PAP were informed of their right to appeal throughout the expropriation process, as defined by the *Law on Expropriation*, including administrative and judicial appeals against the Decisions on Expropriation and regarding compensation.

There is only one dispute that concerned the estimated value of an informally constructed auxiliary structure (garage). The case is currently pending before the Constitutional Court of Montenegro, and the Municipality has no information on when the case can be expected to be completed and compensation paid in this particular case. The compensation funds for this case have been secured in an escrow account. The national Law provides that the expropriation beneficiary may acquire the right to take possession of the expropriated property on the day the Expropriation Decision becomes final if it proves that the PAP was duly invited to accept the assessed compensation but rejected the offered compensation. ESS5 allows taking possession of property in such exceptional cases which involve significant difficulties related to the payment of compensation (including lengthy legal proceedings) provided that it can be demonstrated that all reasonable efforts to resolve the matter have been taken and funds deposited in an escrow account to be made available in a timely manner once the matter is resolved. Therefore, the Bank's prior agreement will need to be sought before proceeding with Project activities in this case.

Grievances under the Project's grievance mechanism

The Project's grievance mechanism for receiving and reviewing Project-related complaints was not established prior to nor during the land acquisition procedure.

This is a significant gap given that this was envisaged in the RPF and in the SEP (both documents developed in February 2020 and approved by the Ministry and WB). It is necessary to establish the Grievance Mechanism before the start of construction works in the manner specified in the RPF and the SEP.

7 DISCLOSURE OF INFORMATION AND CONSULTATIONS

Various types of notifications and consultations were published/organized before and throughout the land acquisition process:

- The first public hearing was held in January 2020, during which project documents (the Environmental and Social Management Framework, the Environmental and Social Commitment Plan, the Stakeholder Engagement Plan, the RPF and the Labor Management Plan) were presented to the local community. The public hearing was attended by representatives of the WB, the Municipality of Bijelo Polje, the local population and the non-governmental sector. There were no objections to the Project during this public hearing.
- Notices relevant to the implementation of the Project are continuously published on the Municipality's website¹⁴;
- PAP living in the Project area were individually visited by the representatives of the Municipality, Administration and the experts for valuation of property,
- All PAPs were invited by the Administration and were informed about the expropriation process at individual meetings in the Administration's premises. They were also informed about the estimated amounts of compensation;
- An integral part of all Decisions on Expropriation, which were delivered to PAPs, was the notification about the legal remedy available to them (contact persons for receiving appeals, timeframe for submission of appeals and information that appeals can be filed at no cost to the complainant);
- PAP were informed of their right to request expropriation of the entire plot in cases where only part of the plot was initially planned to be expropriated.

¹⁴ Available at: <https://www.bijelopolje.co.me/index.php/arhiva-glavnih-vijesti/4768-prezentovan-projekat-setalista-uz-lim-sa-obaloutvrdom>
<https://bijelopolje.co.me/index.php/arhiva-vijesti-lijevo/5478-uskoro-pocinie-izgradnja-setalista-pored-lima>

8 KEY FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

8.1 Identified Gaps

The main elements of the land acquisition process conducted by the Municipality in comparison with WB ESS5 are presented in the table below. Identified gaps (with measures recommended in the following sections) are marked in orange.

Table 2: Key findings regarding the land acquisition process

Issue	Activities undertaken	WB ESS 5 requirements	Gaps/comments
Census/socioeconomic survey and Resettlement Action Plan	The Expropriation Study was prepared as the baseline census (with data on affected owners or users and data on affected property). There is no legal requirement regarding surveys or resettlement plans.	A socio-economic baseline assessment and a detailed census must be developed at early stages of project preparation. A RAP must be developed to address physical and/or economic displacement, depending on the nature of the impacts expected from a project.	The Expropriation Study (which contain census data) prepared by the Municipality is broadly compliant with ESS5 census requirements. However, a RAP was not developed, and a socio-economic assessment was not conducted prior to the land acquisition process. Since land acquisition is completed at 99%, this RRA has been developed to bring the process into compliance with WB requirements.
Cut-off date for eligibility	The cut-off date was the date when the Administration sent individual invitations to owners/users of affected land plots and auxiliary structures.	A cut-off date for eligibility must be determined and communicated throughout the project area.	No gaps identified in the process.
Eligibility for compensation (categorization)	<p>A total of 7 PAP (belonging to category i per ESS5 – those who have formal legal rights to the land or assets) which are formal owners of land plots were affected by the Project. On one of these land plots there was also a formal auxiliary structure - garage.</p> <p>A total of 16 PAP (belonging to category ii per ESS5 – those who do not have formal legal rights to land or assets at the time of the census, but who have a claim to land that is recognized or recognizable under national laws) were affected by the Project. All of them were owners of illegally constructed auxiliary structures (garages and one foundation for a garage that was never completed) on state-owned land.</p> <p>One PAP without any recognizable legal right or claim to the land he/she used was affected by the Project (category iii per ESS5 – those who have no recognizable legal right or claim to the land or assets they occupy or use).</p>	<p>There are 3 categories of persons in terms of compensation eligibility:</p> <p>i) those who have formal legal rights to the land or assets,</p> <p>ii) those who do not have formal legal rights to land or assets at the time of the census, but who have a claim to land that is recognized or recognizable under national laws,</p> <p>iii) those who have no recognizable legal right or claim to the land or assets they occupy or use.</p>	<p>No gaps identified in the process.</p> <p>All 7 PAP (belonging to category i per ESS5) who were formal owners of affected land plots received compensation for land and other assets.</p> <p>A total of 15 PAP (belonging to category ii per ESS5) whose auxiliary structures were affected by the Project received compensation. Only one PAP (belonging to category ii per ESS5) refused to receive compensation and filed a complaint against the estimated value of the auxiliary structure, in which case the proceeding is pending before the Constitutional Court of Montenegro. The compensation funds for this case have been secured in an escrow account but the Bank's prior agreement will need to be sought before proceeding with Project activities in this case.</p> <p>One informal user of state-owned land plot as defined by category iii per ESS5 was affected by the Project, who used part of the state-owned land plot to plant various fruit trees and ornamental plants. The Commission carried out an adequate assessment of the fruit trees and ornamental plants planted by this person on state-owned land and compensation was paid. However, it will be necessary to reconsider the method of valuation of plantations made by Commission, and in case of non-compliance with the RPF, it will be necessary to pay the difference in compensation.</p>

Issue	Activities undertaken	WB ESS 5 requirements	Gaps/comments
Timing of compensation	<p>Compensation was in all completed cases paid prior to formal transfer of ownership of expropriated property. The PAP were all informed of the cut-off date when they received the proposals for expropriation (in August 2021) in line with the provisions of the Law. There were no identified cases of new investments or encroachments after the cut-off date.</p> <p>The Municipality did not apply provisions of the Law on Expropriation which allow early access to property before compensation is paid.</p>	Compensation must be provided before displacement or imposition of access restrictions.	No gaps identified.
Types and levels of compensation	<p>Compensation arrangements were based on valuations of the Commission which was appointed by Administration. The Commission prepared a Report on valuation of property and included all land, structures, and any crops/trees/improvements on land.</p> <p>Compensation was calculated and paid in line with the Law on Expropriation and the Rulebook on Methodology for Assessing Property Value, not entirely in line with RPF provisions.</p> <p>Namely, the valuation of affected land plots was based on market value, while the cost method was used to estimate auxiliary structures.</p>	All displaced persons must receive compensation for loss of assets at full replacement cost and other assistance in order to restore, and potentially improve, their standards of living and/or livelihoods to pre-displacement levels.	<p>The Consultant analyzed the submitted documentation related to the valuation and ascertained based on the Commission's Report that the cost method was used to evaluate the value and offer compensation for 16 informal auxiliary structures. The cost method of valuing auxiliary structures that was utilized by the Commission involved estimations based on the principle that the buyer will not pay for the asset more than it would cost him/her to acquire or build the same asset of equal value. Using this method, the costs of building the structure, obtaining the necessary documentation as well as correction depending on the age of the structure (depreciation) were determined. The assessment of the value was thus not in accordance with the chapter 7 of the RPF, where it is stated that depreciation should not be taken into account, and that the assessment should be made at the time of removal of facilities, otherwise inflation must be taken into account. However, depreciation was taken into account in the assessment made by the Commission, and inflation was not taken into account when determining the compensation.</p> <p><u>See chapter 8.2 for recommendations.</u></p>
Livelihood restoration	PAP were provided with compensation for land plots and auxiliary structures, as well as for fruit trees and ornamental plants on affected land plots.	ESS5 requires the restoration or, where possible, improvement of the livelihoods and standards of living of displaced persons to pre-displacement levels.	No gaps identified
Assistance to vulnerable persons /households	The Municipality as the expropriation beneficiary and Administration undertook activities to identify vulnerable people and to assist them as needed.	Particular attention must be paid to vulnerable groups and individuals.	No gaps identified in the process. Even though no formal process for identifying and assisting vulnerable groups was in place (as the Law on Expropriation does not stipulate any such measures), vulnerable groups were de facto identified and provided with assistance during the expropriation process by, e.g., providing legal advice, organizing home visits.
Disclosure of information	Various types of notifications and consultations were published/	Appropriate disclosure of information and involvement of all affected	Although the Municipality as the beneficiary of the expropriation and the Administration as the holder

Issue	Activities undertaken	WB ESS 5 requirements	Gaps/comments
and consultations	<p>organized before and throughout the land acquisition process as described in chapter 7.</p> <p>PAP living in the Project area were individually informed about land acquisition activities and individual meetings were held with each of them.</p>	<p>population must be ensured from the earliest phase.</p>	<p>of the expropriation process took numerous actions to inform the public about the Project and the expropriation procedure, the Consultant found that the disclosure was not in accordance with provisions of the RF and SEP. Namely, the PIU was not involved in the process of informing the public, and did not establish a special webpage dedicated to the Project on the existing website of the Ministry, where all information related to the Project should be published. It was also determined that the PIU did not establish and disclose a Stakeholder Engagement Log (SEL) as a documented record of all stakeholder engagement activities, including group and individual meetings, planned or spontaneous meetings, formal or informal, phone conversations, written exchanges etc.</p> <p><u>See chapter 8.2 for recommendations.</u></p>
Grievance redress	<p>Affected owners were informed of their right to appeal at many stages of the process, as defined by the Law. In addition, the RPF (section 9) provides for the establishment of an grievance mechanism by which all PAP can lodge grievances to PIU. However, this project specific grievance mechanism has not been established yet.</p>	<p>A project-specific grievance mechanism must be established.</p>	<p>A project-specific grievance mechanism has not been established, even though this was defined in the RPF and SEP.</p> <p><u>See chapter 8.2 for recommendations.</u></p>
Monitoring, evaluation and reporting	<p>The Municipality keeps internal records of land acquisition and overall spending.</p> <p>The PIU will facilitate the development of a Completion Audit at the end of the land acquisition process by an independent expert.</p>	<p>Monitoring of the resettlement and livelihood restoration process must be carried out in accordance WB requirements and should involve the participation of key stakeholders such as affected communities.</p>	<p>The PIU does not develop or publicise land acquisition reports or conduct evaluation and monitoring of the process. The PIU was not able to deliver any such reports to the Consultant during the development of this RRA.</p> <p><u>See chapter 8.2 for recommendations.</u></p>

8.2 Gap Closure Recommendations

According to the information provided by the Municipality, no major problems were reported in the land acquisition process. There was only one dispute which referred to the estimated value of an informally constructed auxiliary structure (garage). The case is currently pending before the Constitutional Court of Montenegro. The land acquisition process has been conducted entirely in line with the Law on Expropriation. The conducted analysis indicates that land acquisition activities have been carried out adequately by the Municipality and Administration; however, some gaps in terms of WB requirements have been identified. It is recommended to perform the following activities to achieve full compliance with WB ESS5:

- 1 The Consultant analyzed the Report on the Assessment of the Value of Property prepared by the Commission and determined that the assessment was not performed in accordance with the provisions of the RPF. Namely, it has been ascertained that the cost method was used to evaluate the value and offer compensation for the auxiliary structures. Such assessment was not in accordance with the RPF, where it is stated that depreciation will not be taken into account, and that the assessment will be made at the time of removal of facilities, otherwise inflation must be taken into account. However, depreciation was taken into account in the assessment made by the Commission, and inflation was not taken into account when determining the compensation. Therefore, the owners will need to be contacted by the Municipality and the Administration for purpose of bridging this gap by paying the owners the difference in price in relation to the above.
Furthermore, it has been determined that the Commission's Report does not contain a description of the method of valuation of trees/plants grown by a private person on state-owned land which does not allow assessment of adequacy of compensation in line with RPF. Therefore, it is necessary to reconsider the method of valuation of plantations made by Commission, and in case of non-compliance with the RPF, it will be necessary to pay the difference in compensation. xxx
- 2 There is only one dispute regarding the estimated value of an informally constructed auxiliary structure (garage) – the case is currently pending before the Constitutional Court of Montenegro. The compensation funds for this case have been secured in an escrow account. The national Law provides that the expropriation beneficiary may acquire the right to take possession of the expropriated property on the day the Expropriation Decision becomes final if it proves that the PAP was duly invited to accept the assessed compensation but rejected the offered compensation. ESS5 allows taking possession of property in such exceptional cases which involve significant difficulties related to the payment of compensation (including lengthy legal proceedings) provided that it can be demonstrated that all reasonable efforts to resolve the matter have been taken and funds deposited in an escrow account to be made available in a timely manner once the matter is resolved. Therefore, the Bank's prior agreement will need to be sought before proceeding with Project activities in this case.
- 3 At a distance of 50-80 m from the Project there are several local businesses (coffee shop, markets, hotel etc.) which may potentially be affected by temporary negative impacts during the construction phase. Therefore, in case such impacts occur, the Municipality will need to provide compensation as defined in the RPF (i.e. "cash compensation for loss of income until the completion of construction works which directly impact the business operations of the business entity, in line with assessment of court experts").
- 4 The PIU should undertake steps to implement the activities listed in the approved Project Stakeholder Engagement Plan. For example, the PIU should create a webpage about the Project on the existing website of Ministry. All future Project related environmental and social monitoring reports should be disclosed on this webpage. Project updates (including news on construction activities and relevant environmental and social data) as well as all information brochures/fliers should also be posted on the Ministry's website. In particular, details about the Project Grievance Mechanism should be posted on

the website including the electronic grievance submission form. Contact details of the PIU, the Contractor(s) as appointed and the Supervision Consultant as appointed should be publicized. The PIU needs to update and maintain the website regularly (at least once a quarterly basis). Further, the PIU is also required to create a dedicated project Facebook page for PAPs and other stakeholders.

Written information will also be disclosed to the public via a variety of communication materials including brochures, flyers, posters, etc. The PIU will set up Information Desk in the premises of Municipality where they can meet and share information about the Project with PAPs and other stakeholders. Information Desk will provide local residents with information on stakeholder engagement activities, construction updates, contact details of the PIU. Brochures and flyers on various Project related social and environmental issues will be made available at this Information Desk.

The PIU must also maintain and disclose a Stakeholder Engagement Log as a documented record of all stakeholder engagement activities, including group and individual meetings, planned or spontaneous meetings, formal or informal, phone conversations, written exchanges etc. Each log entry should contain details of stakeholders engaged, date, time and place of meeting/method of communication, short description of the topics discussed, information gathered, a summary of the feedback received, if any, and a brief explanation of how the feedback was taken into account, or the reasons why it was not.

- 5 The PIU must ensure that the grievance mechanism is implemented in accordance with the provisions of the SEP and the RPF. The PIU needs, inter alia, to establish a register of grievances, and ensure that PAPs are fully informed of the grievance mechanism by communicating the availability of this registry, its function, the contact persons and the procedures to submit a complaint in the affected areas. As stated above, the grievance form for this Project with contact information (address, e-mail, telephone number and contact person) must be published on the Ministry's website. The PIU needs, inter alia, to ensure that the Municipality dedicates at least one officer to the task of administering grievances and updating the PIU regularly.
- 6 The PIU should improve monitoring, evaluation and reporting for this Project by using the indicators defined in the RPF (chapter 10). It should produce reports based on these indicators, submit these to WB and publicize the reports in a summarized form without confidential information on its website.

ANNEXES

ANNEX 1: SUMMARIZED VERSION OF THE CENSUS DATABASE CONTAINING NON-CONFIDENTIAL DATA

Note: Full data is provided in separate Excel tables containing confidential information.

No.	Location	Cadastral borough	Land plot number	Public/private	Complete or partial acquisition	Total area of plot (m ²)	Total affected area of plot (m ²)	Structure/s (commercial or residential) on affected or unaffected part of land	Other assets (natural structures)	Affected auxiliary assets	Other assets on land (unaffected)	Physical displacement
1.	Bijelo Polje	Bijelo Polje	156/2	Public	Part of the land plot	494	131	-	-	-		No
2.	Bijelo Polje	Bijelo Polje	156/4	Public	Part of the land plot	61	1	-	-	-		No
3.	Bijelo Polje	Bijelo Polje	2350/1	Public	Part of the land plot	404071	10115	-	-	-		No
4.	Bijelo Polje	Bijelo Polje	2353/1	Public	Part of the land plot	485	238	-	-	15 garages + 1 garage foundation (all without permits)		No
5.	Bijelo Polje	Bijelo Polje	2353/2	Public	Part of the land plot	460	146	-	2 birch trees 1 Grapevine 1 thuja tree 1 cypress tree 1 walnut tree (all these were planted by private person)	15 garages + 1 garage foundation (all without permits)		No
6.	Bijelo Polje	Bijelo Polje	2348/1	Public	Part of the land plot	15551	173	-	River Lješnica	-		No
7.	Bijelo Polje	Bijelo Polje	1333/1	Private	Part of the land plot	184	16	Residential building (not affected)	1 Pear tree 5 rose bushes	-		No
8.	Bijelo Polje	Bijelo Polje	1347	Private	Part of the land plot	68	19	-	2 walnut trees	-		No
9.	Bijelo Polje	Bijelo Polje	1333/2	Private	Entire land plot	18	18	-	-	Garage		No
10.	Bijelo Polje	Bijelo Polje	1223	Private	Part of the land plot	429	1	-	-	-		No

No.	Location	Cadastral borough	Land plot number	Public/private	Complete or partial acquisition	Total area of plot (m ²)	Total affected area of plot (m ²)	Structure/s (commercial or residential) on affected or unaffected part of land	Other assets (natural structures)	Affected auxiliary assets	Other assets on land (unaffected)	Physical displacement
11.	Bijelo Polje	Bijelo Polje	1225	Private	Part of the land plot	1278	6	2 residential buildings (not affected)	-		Shed/garage (not affected)	No
12.	Bijelo Polje	Bijelo Polje	1292	Private	Part of the land plot	479	27	Residential building (not affected)	-		Shed/garage (not affected)	No
13.	Bijelo Polje	Bijelo Polje	1332	Private	Part of the land plot	350	4	Residential building (not affected)	-		Shed/garage (not affected)	No

ANNEX 2: QUESTIONNAIRES USED FOR PRIMARY DATA COLLECTION

#1 - Questionnaire for landowners or users

Date of survey:	
Survey start time:	_____ h, _____ min
Name of interviewer:	
Number and location of the expropriated plot:	
Name of respondent:	
Contact number:	

	Question	Answer
1.	Was the whole plot expropriated or only a part of it?	
2.	What is the area of your expropriated part in m ² ?	
3.	Have you lost any other real estate/s (e.g. auxiliary structures, etc.) in addition to the land? <i>If YES</i> - what was the purpose of the auxiliary structure/s? - was the structure/s built with or without permits?	
4.	Did you receive the compensation in full? <i>If YES, was it monetary compensation or replacement property?</i> <i>(if the compensation was monetary)</i> Are you satisfied with the monetary compensation you received? <i>If NO, why?</i>	
5.	Did you buy other land with that money? <i>If YES:</i> What is the area of the new plot in m ² ? Where is it located? Did you have additional costs when buying other land (e.g. taxes) that were not compensated for?	
6.	<i>(if the compensation was replacement land)</i> Are you satisfied with the replacement plot you received? Is the new plot exactly the same standard/content as your expropriated plot? What is the area of the plot in m ² ? Were you able to negotiate a different location?	
7.	Did you request the expropriation of other land plots you own, which are located in the immediate vicinity of your expropriated land plot? <i>If NO, skip the next questions.</i> Was your request granted? What is the area of the land plot / plots for which you requested to be additionally expropriated? Are you satisfied with the outcome?	
8.	Did you use the expropriated plot for agricultural purposes? <i>If NO, skip to the next question.</i> <i>If YES:</i> What did you have on the plot? (crops...) Did you use the land for your own needs and/or as a source of income (for selling crops, etc.)? If the answer is yes, are you registered as an agricultural producer? Did you receive compensation for crops and trees? Have you continued your agricultural activities elsewhere? (If not, what is the main reason?)	
9.	Was the expropriated plot used by anyone other than the owner? <i>If YES, please briefly state who used the plot, for what purpose, for how long, and whether the user received any compensation?</i>	
10.	How many members does your household have?	
11.	Were there any vulnerable categories (disabled, children, etc.) in the household of the user of expropriated plot? <i>If YES, were their needs taken into account during the expropriation process – e.g. special help for the elderly?</i>	
12.	Are you satisfied with the information provided to you during the expropriation process? <i>If the answer is 1 – skip to the next question.</i> <i>If the answer is 2 or 3 – why are you dissatisfied and what could have been done differently?</i>	1-completely satisfied 2-partially satisfied 3-dissatisfied
13.	What is your main source of income (employment, pension, etc.)?	

14.	Has expropriation affected your household income?	1- No 2- Yes, positively 3- Yes, negatively
	Please comment, why?	

Interviewer comments and observations (difficulties encountered, additional observations, etc.)

Survey completion time: _____ h, _____ min

Questionnaire checked by:	(signature)
Date of verification:	
Coordinator's comments:	

ANNEX 3: STATEMENT OF CONSENT

I _____ (name and surname), ID card number: _____, inhabited in _____ (city, municipality and address of residence) as a respondent I voluntarily give:

STATEMENT OF CONSENT FOR THE PROCESSING AND USE OF PERSONAL DATA

By signing this Statement, I confirm that I have been previously informed by E3 Ltd., Serdara Jola Piletića 24, 81000 Podgorica (hereinafter the Controller) of the reasons for collecting personal data and giving this consent in accordance with the Law on Personal Data Protection (Official Gazette of Montenegro No. 79/08, 70/09, 44/12 and 22/17), in order to implement the Project of construction of embankments on Grncar and Lim rivers.

In this regard, I voluntarily give my consent that the controller can process and use my personal data, and that it may submit it to the Ministry of Agriculture, Forestry and Water Management, Municipality of Bijelo Polje and the World Bank, only for the purpose listed above. Personal data that I consent to be subject to processing by E3 Ltd. are: name and surname, year of birth, sex, address of residence, e-mail address, telephone / mobile contact number, level of education, health condition, type and number of identification document.

I am informed by the controller that at any time, in full or in part and free of charge, I am free to withdraw my statement by submitting a notice to E3 Ltd., Serdara Jola Piletića 24, 81000 Podgorica or by e-mail: office@e3consulting.co.me. Also, I am aware that the controller will keep my personal data for as long as necessary to fulfil the purpose for which they are processed, unless the controller is bound by additional legal deadlines for their storage.

Withdrawal of this statement will not affect the legality of processing before withdrawal of the statement.

Name and surname: _____
 Signature: _____
 Date and time of signature: __. __. 2022, at ___ h ___ min

The legal basis for the collection, processing and storage of personal data is your voluntary written consent given by signing this statement. By signing this statement, you consent to the further processing of your personal data that you will provide in the survey questionnaire that is an integral part of this statement. Personal data are collected for processing for the purpose of implementing the Project of construction of embankments on Grncar and Lim rivers.

The information within this Project will only be used in ways that will not reveal who you are. You will not be identified in any of the publications within this Project and your identity as a Project participant is confidential.

Your data will be protected from unauthorized access or misuse, and will be handled in accordance with legal regulations with appropriate security measures.

ANNEX 4: NOTIFICATION OF SOCIOECONOMIC SURVEY

SURVEY NOTICE

TO OWNERS / USERS OF LAND PLOTS AND STRUCTURES WITHIN THE PROJECT OF CONSTRUCTION OF THE EMBANKMENTS AT THE GRNCAR AND LIM RIVERS

We would like to inform you that in the period from 3 March 2022 to 13 March 2022 the owners/users of land plots and structures, which are intended for expropriation, will be surveyed in the area of the Municipality of Bijelo Polje, at the site of the planned construction of the embankments at the Lim river.

The map below shows the project area, and the land plots that are planned to be expropriated. Owners/users of land plots marked in green will be the subject of a survey.

The purpose of this survey is to collect socio-economic data on families and individuals living or working on properties covered by expropriation, in order to establish a fairer land acquisition system and so that the Municipality of Bijelo Polje in cooperation with the Ministry of Agriculture, Forestry and Water Management can better plan its activities in that direction.

The data collected from the survey are confidential and will be used for the purpose of drafting the document " Resettlement Review and Audit" for the needs of the Project.

The organization of the survey will be performed by consultants of the company E3 d.o.o. engaged in order to support the Project.

If you cannot or do not want to attend the survey in the specified period, please contact us by 13 March 2022, by calling the telephone number: 020/227-501 or via e-mail: office@e3consulting.co.me, so that we can contact you directly and agree on an alternative way of surveying at our expense.

If you are not sure whether your land plot will be the subject of expropriation, please call the above number to help you.

We thank you in advance for your cooperation.

Ministry of Agriculture, Forestry and Water Management

Municipality of Bijelo Polje

Consulting company E3 d.o.o.



Notification on socio-economic survey and map of project area – Municipality of Bijelo Polje

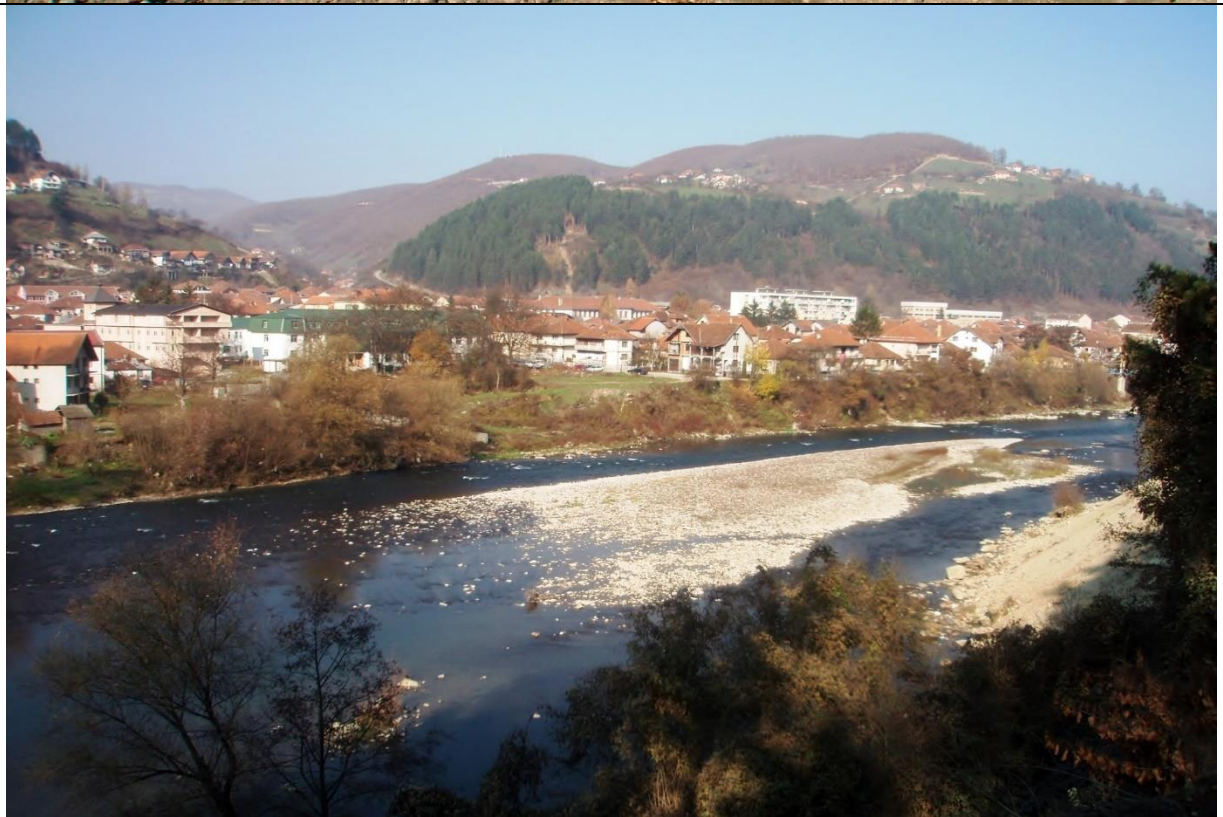


ANNEX 5: SELECTED PHOTOGRAPHS FROM THE PROJECT SITE



Location of illegally built garages on state-owned land plots





Location of project area