



**Montenegro/Ministry of Agriculture, Forestry
and Water Management**

**CLIMATE RESILIENT FISHERIES AND
AGRIFOOD SECTOR DEVELOPMENT
PROJECT
P507698**

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

**For Negotiations
October 15, 2025**

1. Montenegro (the Borrower) will implement the Climate Resilient Fisheries and Agrifood Sector Development Project (the Project), with the involvement of the Ministry of Agriculture, Forestry and Water Management (MAFWM), as set out in the Loan Agreement (the Agreement). The International Bank for Reconstruction and Development (the Bank), has agreed to provide financing for the Project, as set out in Agreement.
2. The Borrower shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Bank. The ESCP is a part of the Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the Agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Borrower shall carry out or cause to be carried out, including, as applicable, their respective timeframes; institutional, staffing, training, monitoring and reporting arrangements; and grievance management. The ESCP also sets out the environmental and social (E&S) documents that shall be prepared or updated, consulted, disclosed and implemented under the Project, consistent with the ESSs, in form and substance acceptable to the Bank. Said E&S documents may be revised from time to time with prior written agreement by the Bank. As provided for under the referred Agreement, the Borrower shall ensure that there are sufficient funds available to cover the costs of implementing the ESCP.
4. As agreed by the Bank and the Borrower, this ESCP will be revised from time to time, if necessary, to reflect adaptive management of Project changes or unforeseen circumstances or in response to Project performance. In such circumstances, the Bank and the Borrower agree to update the ESCP to reflect these changes through an exchange of letters signed between the Bank and the Borrower's Representative specified in the Agreement. The Borrower shall promptly disclose the updated ESCP through the Project Management Team (PMT) of the Project.
5. The subsection on "Indicators for Implementation Readiness" below identifies the actions and measures to be monitored to assess Project readiness to begin implementation in accordance with this ESCP. Nevertheless, all actions and measures in this ESCP shall be implemented as set out in the "Timeframe" column below irrespective of whether they are listed in the referred subsection.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
IMPLEMENTATION ARRANGEMENTS AND CAPACITY SUPPORT ¹			
A	ORGANIZATIONAL STRUCTURE a) Establish and maintain Project Management Team (PMT) within the MAFWM with qualified personnel and adequate resources to effectively manage the environmental, social, health, and safety (E&S) risks and impacts associated with the Project, in the following way: Maintain the existing PMT established for the ongoing Bank funded MIDAS 2 project which includes full-time Project manager, full time Senior M&E Specialist, a part-time Senior Civil Engineer, and a part-time Senior ESF specialist and extend their implementation responsibilities to the CRFASD Project. b) Strengthen and expand PMT with additional specialists including an ABP Specialist in the field of veterinary services, a full-time civil engineer, and a full-time Social Development Specialist to manage E&S risks and impacts of the Project, each with qualifications and experience satisfactory to the Bank. c. Hire services of specialized Consultancy firms/organizations for conducting out site specific stakeholder engagement, management of Grievances and trainings, where relevant. d. Enter into arrangements with Relevant Municipalities, Cadaster Agency, Environment permitting agency, Labor inspectorate and other relevant agencies as relevant to manage E&S risks and impacts of the project.	a. Formally extend implementation responsibilities of the existing PMT by signing hiring contracts prior to conclusion of Appraisal. b1) additional ABP specialist in the field of veterinary services, a full-time civil engineer not later than six months after the effective date, and b2) Hire an additional full-time Social Development specialist no later than 3 months after Effective Date. Thereafter maintain PMT positions throughout Project implementation c) and d) No later than start of bidding process and hereafter maintain throughout Project implementation	MAFWM

¹ For all actions, consult with the country lawyer to ensure consistency with the legal agreement in cases where some actions need to be completed before the project becomes effective (effectiveness condition) or before certain disbursements can occur (disbursement condition).

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> Capacity building measures shall be provided to PMT on the ESF. The PMT shall further undertake capacity building measures for other implementing partners, Municipality and other permitting agencies that shall focus on stakeholder engagement and grievance mechanism, managing adverse impacts from land acquisition past and future, project ESMF approach on E&S risk management; identification of E&S risks and implementation of risks management measures; and E&S monitoring and reporting, application of LMP, including Code of Conduct, incident reporting and occupational health and safety, vulnerable and disadvantaged groups. The Training shall be undertaken by the World Bank and/or Consultancy firm above under A (b). 	First measures to be undertaken by March 2026 to continue throughout Project Implementation.	MAFWMPMT

MONITORING AND REPORTING			
C	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Bank regular monitoring reports on the environmental, social, health and safety (E&S) performance of the Project. The reports shall include:</p> <ul style="list-style-type: none"> Status of preparation and implementation of E&S documents required under the ESCP. Summary of stakeholder engagement activities carried out as per the Stakeholder Engagement Plan. Complaints submitted to the grievance mechanism(s), the grievance log, and progress made in resolving them. E&S performance of contractors and subcontractors as reported through monthly contractors' and supervision firms' reports. Contractors and subcontractors' compliance with the Project Labor Management Procedures as reported through monthly contractors' and supervision firms' reports, and independently checked by the PMTs Social Specialist, Number and status of resolution of incidents and accidents reported under action E below. Status of Associated Facilities, where relevant. Status of land acquisition and implementation of the site-specific Resettlement Action Plan, where relevant. 	Submit quarterly and semiannually reports to the Bank throughout Project implementation, commencing after the Effective Date. Submit each report to the Bank no later than 45 days after the end of each reporting period.	MAFWM/PMT

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
D	CONTRACTORS' MONTHLY REPORTS Require contractors and supervising firms to provide monthly monitoring reports on E&S performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Bank.	Submit the monthly reports to the Bank as part of the reports under Section C above throughout implementation of the Project. Reporting shall start thirty (30) days after the construction contractors begin the respective activities and thereafter monthly throughout contract implementation	MAFWM/PMT
E	INCIDENTS AND ACCIDENTS Notify the Bank of any incident or accident relating to the project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including those resulting in death or significant injury to workers or the public; acts of violence, discrimination or protest; unforeseen impacts to cultural heritage or biodiversity resources; pollution of the environment; dam failure; forced or child labor; displacement without due process (forced eviction); allegations of sexual exploitation or abuse (SEA), or sexual harassment (SH); or disease outbreaks. Provide available details of the incident or accident to the Bank upon request. Arrange for an appropriate review of the incident or accident to establish its immediate, underlying and root causes. Prepare, agree with the Bank, and implement a Corrective Action Plan that sets out the measures and actions to be taken to address the incident or accident and prevent its recurrence.	Notify the Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request. Provide review report and Corrective Action Plan to the Bank no later than 10 days following the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.	MAFWM/PMT
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS <ul style="list-style-type: none"> Prepare and implement an Environmental and Social Management Framework (ESMF) for the Project, consistent with the relevant ESSs. This includes, but is not limited to: Preparation of Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP) for the ABP plant, as per the provisions of ESMF and in line with ESS1. Supplement the Environmental and Social Impact Assessment (ESIA) and update the Environmental and Social Management Plan (ESMP) for the Fishing Port in Ucinj with respect to provisions of the ESMF and also the final design and in line with ESS1. Preparation of ESMP Checklists, site specific ESMPs or ESIA, as needed and as per the provisions of the ESMF 	1. prepare ESMF prior to Appraisal, implement throughout Project implementation. 2. The ESIA and ESMP for ABP shall be finalized before June 2026. 3. Supplement of ESIA and update of ESMP for Fishing port in Ucinj shall be finalized before January 2026. 4. The draft ESMP/ESMP Checklists shall be finalized before launching the bidding process. ESMP/ESMP-CI will be then incorporated as part of the respective bidding documents for the respective subproject	PMT

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ul style="list-style-type: none"> Require contractors to prepare and implement site-specific Contractor Environmental and Social Management Plans (C-ESMPs) or EMMP Checklist, as set out in the respective ESMP and ESMF. 	<p>activity prior to the carrying out of subproject activity that requires the preparation of such ESMP. Once finalized, implement the respective ESMP/ESMP-CL throughout Project implementation.</p>	
<p>The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>5. C-ESMP shall be developed prior to start of civil works and implemented throughout.</p>	
PMT		
<p>The proposed activities described in the exclusion list set out in the ESMF shall be ineligible to receive financing under the Project.</p>	<p>The ESMF, LMP and SEP will be prepared and disclosed prior to appraisal. As part of the preparation of procurement documents and respective contracts. Supervise contractors throughout Project implementation. Copies of relevant contracts provided to the Bank upon request.</p>	MAFWM/PMT and TSU
1.2 MANAGEMENT OF CONTRACTORS		
<p>Incorporate the relevant aspects of the ESCP, including, inter alia, [ESMPs, RPF, LMP and SEP], the Labor Management Procedures, and code of conduct, into the E&S specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and that they require their subcontractors to comply with the E&S specifications of their respective contracts (Contractor's ESMP, Occupational Health and Safety Plan, Water and Waste Management Plan, Traffic Management and Road Safety, Management Plan, Labor Influx Management Plan, Workers Camp Management Plan, Material Sourcing Plan and Site, Restoration Plan and Community Health and Safety Plan). Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p>		
1.3 TECHNICAL ASSISTANCE	<p>Throughout Project implementation.</p>	MAFWM/PMT and TSU
<p>Carry out the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project in accordance with terms of reference acceptable to the Bank, that are consistent with the ESSs. Thereafter prepare and finalize the outputs of such activities in compliance with the terms of reference.</p>	<p>Ensure assessment of associated facilities are included in the ESMF and RPF.</p>	
1.4 ASSOCIATED FACILITIES	<p>Prepare all adequate E&S due diligence documentation in line with provisions of the ESMF and prior to start of any works on the relevant sub project.</p>	MAFWM/PMT
<p>If the construction of Associated Facilities, as defined in the ESF and described in the ESMF, is required for the implementation of site-specific activities, ensure that all activities related to the construction of Associated Facilities are carried out in accordance with the applicable requirements of this ESCP and the ESSs. This includes, inter alia, the ESIA, ESMP, LMP, management of contractors, RAP and SEP.</p>		
ESS 2: LABOR AND WORKING CONDITIONS		

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
2.1	LABOR MANAGEMENT PROCEDURES Prepare and implement the Labor Management Procedures (LMP) for the Project.	Implement the LMP throughout Project implementation.	MAFWM/PMT
2.2	OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with the ESMPs for the Fishing port in Ulcinj and ABP at Niksic as described in the ESMF.	Ensure the OHS Management Plan is prepared by the contractors and subcontractors prior to the commencement of any construction work and thereafter implemented throughout Project implementation.	MAFWM/PMT
2.3	GRIEVANCE MECHANISM FOR PROJECT WORKERS Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.	Establish grievance mechanism prior to engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MAFWM/PMT
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	WASTE MANAGEMENT PLAN Prepare and implement a Waste Management Plans (WMPs) where relevant, as a standalone document but part of the site specific ESMPs prepared for the Project under action 1.1 above, to manage hazardous and non-hazardous wastes, consistent with ESS3.	Same timeframe as for the preparation and implementation of the ESMPs	MAFWM/PMT
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT Incorporate resource efficiency and pollution prevention and management measures in the ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESMPs	MAFWM/PMT
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	TRAFFIC AND ROAD SAFETY Incorporate measures to manage traffic and road safety risks as required in the ESIA and ESMPs to be prepared under action 1.1 above.	Same timeframe as for the preparation and implementation of the ESIA and ESMP.	MAFWM/PMT
4.2	COMMUNITY HEALTH AND SAFETY Assess and manage specific risks and impacts to the community arising from Project activities, and include mitigation measures in the ESMPs to be prepared in accordance with the ESMF.	Same timeframe as for the preparation and implementation of the ESMPs	MAFWM/PMT
4.3	SEA AND SH RISKS Assess and manage specific SEA/SH risks and impacts to the community arising from Project activities as a part of ESMP, LMP and GRM with the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner	Same timeframe as for the adoption and implementation of ESMPs under action 1.1 above,	MAFWM/PMT
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT [The relevance of ESS5 is established during the ESA process. If resettlement documents need to be prepared (e.g., resettlement process frameworks, resettlement action plans, process frameworks) this should be reflected in the ESCP. See sample actions below]			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
5.1	<p>RESETTLEMENT FRAMEWORK and PLANS</p> <p>1. Prepare and implement a Resettlement Policy Framework (RPF) for the Project, consistent with ESS5.</p> <p>2. Prepare and implement a Resettlement Plan (RP) or a Livelihood Restoration Plan (LRP) for each activity under the Project for such RP or LRP is required, as set out in the RPF, and consistent with ESS5.</p> <p>3. Conduct Ex-post Social Audits (EPSA) in cases where the land acquisition has already taken place and implement gap filling measures between the country law and ESS5 as per the Project's RPF and provisions of ESS5, where appropriate.</p>	<p>Prepare the RPF prior to. Appraisal and Implement throughout Project implementation.</p> <p>2. Prepare and implement the respective RP or LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, full compensation has been provided and displaced people have been resettled and moving allowances have been provided.</p> <p>3. Conduct the EPSA and implement gap filling measures, including ensuring that full compensation has been provided, prior starting any construction work on the land that has been acquired.</p>	MAFWM/PMT
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	<p>BIODIVERSITY RISKS AND IMPACTS</p> <p>Prepare and implement a Biodiversity Management Plan (BMP) within the site specific ESIA and ESMPs as needed for given project sites, in accordance with the ESMF and consistent with ESS6.</p>	<p>Same timeframe as for the adoption and implementation of ESMPs under action 1.1 above.</p>	MAFWM/PMT
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Prepare and implement a Cultural Heritage Management Plans (CHMPs) as part of the site specific ESMPs, where relevant, in accordance with the guidelines of the ESIA prepared for the Project, and consistent with ESS8.	Same timeframe as for the adoption and implementation of ESMPs under action 1.1 above.	MAFWM/PMT
8.2	CHANCE FINDS Describe and implement the chance finds procedures described in the ESMF developed for the Project, and incorporate into the respective ESMPs and Bidding documents	Same timeframe as for the adoption and implementation of ESMPs under action 1.1 above.	MAFWM/PMT
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN Update and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Implement the SEP throughout Project implementation.	MAFWM/PMT
10.2	For each specific Project activity prepare a specific SEP implementation plan. PROJECT GRIEVANCE MECHANISM Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10. The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Establish the grievance mechanism prior to Appraisal, and thereafter maintain and operate the mechanism throughout Project implementation.	MAFWM/PMT
INDICATORS FOR IMPLEMENTATION READINESS			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
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The following actions are indicators for implementation readiness:

1. Establishment of the Project Management Team (PMT) with adequate E&S personnel (A above)
2. Recruitment and training of E&S staff within PMT (B above)
3. E&S assessments and plans to be prepared by the Borrower, through PMT prior to tendering of the works (1.1 above)