



Government of Montenegro

Waste Management Reform Project (P510187)

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

Negotiated

February 24, 2026

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. Montenegro (the Borrower) is planning to implement the proposed Waste Management Reform Project (the Project) with the involvement of the Ministry of Ecology, Sustainable Development and Northern Region Development, 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 Activities are 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 Loan Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred 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 for the Activities, 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 Loan 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, during the implementation of the Activities, to reflect adaptive management of changes and unforeseen circumstances related to the Activities or in response to assessment of performance of the Activities. 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 Recipient's Representative specified in the Loan Agreement or the Ministry of Ecology, Sustainable Development and Northern Region Development. The Recipient shall promptly disclose the updated ESCP.
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			
A	<p>ORGANIZATIONAL STRUCTURE</p> <p>a. Establish and maintain a Project Implementation Unit with qualified staff and resources to support management of environmental, social, health and safety (E&S) risks and impacts of the Project including a Social Specialist, and an Environmental Specialist.</p> <p>b. Incorporate requirement of the E & S specialists within ToR of the Contractor and Supervision Engineers.</p>	<p>a. Hire specialists by Effectiveness date. The establishment of the PIU will be condition for the project's effectiveness. Thereafter, maintain throughout project implementation.</p> <p>2. Prior to issuance of the bidding documents of the corresponding activities and thereafter, implement throughout project implementation.</p>	<p>Ministry of Ecology, Sustainable Development and Northern Region Development (MESD NRD)</p>
B	<p>CAPACITY BUILDING PLAN/MEASURES</p> <p>Prepare and implement the following capacity building measures:</p> <ul style="list-style-type: none"> • training for PIU staff on E&S management • training for Project workers (including contractors and supervisors) on ESMP implementation if needed • training on project GRM and code of conduct for the project workers and relevant Municipalities • training of relevant participating municipalities on their respective role in the implementation of this project 	<p>Throughout Project Implementation</p>	<p>MESDNRD and PIU</p>
MONITORING AND REPORTING			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
B	<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. • Submission of environmental monitoring result. • 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. • Number and status of resolution of incidents and accidents reported under action E below. 	<p>Submit biannual reports to the Bank during implementation of the Activities, commencing after the Effective Date. Submit each report to the Bank no later than 20 days after the end of each reporting period.</p>	<p>MESDNRD and PIU</p>
D	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>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.</p>	<p>Submit the monthly reports to the Bank upon receipt, and also summarized in the biannual reports defined in section C.</p>	<p>MESDNRD and PIU</p>
C	<p>INCIDENTS AND ACCIDENTS</p> <p>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;</p>	<p>Notify the World Bank no later than 48 hours after learning of the incident or accident. Provide available details upon request.</p>	<p>MESDNRD and PIU</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<p>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.</p> <p>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.</p>	<p>Provide review report and Corrective Action Plan to the Bank no later than 10 days after the submission of the initial notice, unless a different timeframe is agreed to in writing by the Bank.</p>	
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ENVIRONMENTAL AND SOCIAL ASSESSMENTS AND/OR PLANS</p> <ol style="list-style-type: none"> 1. Prepare and implement an Environmental and Social Impact Assessment (ESIA) with embedded Environmental and Social Management Plan (ESMP) for activities related to Kombinat Aluminijuma Podgorica (KAP), consistent with the relevant ESSs under Component 3 of the Project 2. Prepare and implement an Environmental and Social Impact Assessment (ESIA), with embedded Environmental and Social Management Plan (ESMP) for activities related to Niksic Waste Management Center, consistent with the relevant ESSs under Component 2 of the Project. 3. Prepare and adopt ESMPs in a manner that is consistent with the relevant ESSs for transfer centre in Niksic and any additional activities that correspond to Additional Facilities (AF) requirements (see point 1.4 below). 	<ol style="list-style-type: none"> 1. Prepare the draft ESIA and ESMP based on the preliminary design by Appraisal and thereafter update together with the baseline monitoring and design prior to preparation of bidding document and disbursement of the financing. Thereafter implement ESIA with embedded ESMP throughout Project implementation. 2. Prepare the ESIA and ESMP prior to issuance of bidding documents of the relevant activity and implement the respective ESMP throughout Project implementation. 	<p>MESDNRD and PIU and contractor, Municipality of Niksic for Component 2.</p>

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
		3. Prior to the issuance of the bidding document and thereafter implement throughout project implementation.	
1.2	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, 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. Provide copies of the relevant contracts with contractors/subcontractors and supervision firms to the Bank.</p>	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.	MESDNRD and PIU
1.3	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (1) to strengthen the regulatory framework; (2) institutional capacity building for improved waste management; and (3) awareness raising and community engagement In particular under component 1 as well as under other components, are carried out in accordance with the terms of reference as agreed with the World Bank that are consistent with the ESF and all ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.</p>	Throughout Project implementation.	MESDNRD and PIU
1.4	<p>ASSOCIATED FACILITIES</p> <p>For all Project activities where Associated Facilities are identified as per the World Bank’s ESF and ESS1 (such as the transfer stations linked to the Niskic WMC), ensure that the activities in the Associated Facilities are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the ESIA, ESMP, LMP, management of contractors, RAP, and SEP.</p>	Prior to the commencement of the civil works of the Associated Facilities and thereafter, implement throughout Project implementation.	MESDNRD and PIU

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project and thereafter as part ESIA and ESMP for the activities related to KAP consistent with ESS2.</p> <p>Prepare and implement the Labor Management Procedures (LMP) for the Project and thereafter as part ESIA and ESMP for the activities related to Niksic Waste Management Center, consistent with the relevant ESSs..</p>	Same as 1.1	MESDNRD and PIU
2.2	<p>OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT PLAN</p> <p>1. Prepare and implement an OHS Management Plan to assess and manage the OHS risks and impacts of the Project.</p> <p>2. Require contractors and subcontractors to prepare and implement OHS Management Measures or Plan in accordance with ESIA/ESMPs and in a manner consistent with the requirements of ESS2.</p>	<p>The OHS will be integral part of ESIA/ESMP and will follow the same timeframe for the preparation and implementation of the ESIA/ESMPs under 1.1.</p> <p>2. Prior to the mobilization of workforce and equipment and thereafter, throughout project implementation.</p>	<p>1. MESDNRD and PIU</p> <p>2. MESDNRD and PIU</p>
2.3	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2.</p>	Establish grievance mechanism prior engaging Project workers and thereafter maintain and operate it throughout Project implementation.	MESDNRD and PIU
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.1	WASTE MANAGEMENT PLAN Adopt and implement hazardous and non-hazardous waste management plan as envisaged in the ESIA/ESMP and in a manner that is consistent with the requirements of ESS3.	The waste management plan/procedures will be an integral part of the site-specific ESIA/ESMP and will follow same timeframe for the preparation and implementation of the ESIA/ESMPs under 1.1.	MESDNRD and PIU
	Require Waste Producers to prepare and implement Waste Management Plans (WMPs) in accordance with the existing national law on Waste Management and other by-laws and the requirements of ESS3.	Prepare and adopt, as part of the preparation of the procurement documents and respective contracts. Supervise Contractors throughout project implementation. .	MESDNRD and PIU
3.2	RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT 1. Require and ensure that Contractor's environmental and social management plans, as required by the ESIA/ESMP, to include relevant resource efficiency and pollution prevention measures. 2. Supervise the implementation of the referenced plans in 3.1	Prepare and adopt, as part of the preparation of the procurement documents and respective contracts. Supervise Contractors throughout project implementation. 2. Throughout project implementation.	1. MESDNRD and PIU
			MESDNRD and PIU
3.3	Carry out environmental sampling and monitoring as defined in ESIA/ESMP.	As an integral part of the site-specific ESMP activity will follow similar timeline as that prescribed under 1.1. Updated ESMP must be integrated into the bidding documents for works.	MESDNRD and PIU
ESS 4: COMMUNITY HEALTH AND SAFETY			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <p>Incorporate measures to manage traffic and road safety risks as required in the ESIA/ESMP to be prepared under action 1.1 above.</p>	As an integral part of the site-specific ESIA/ ESMP activity following similar timeline as that prescribed under 1.1.	MESDNRD and PIU
4.2	<p>COMMUNITY HEALTH AND SAFETY</p> <p>Assess and manage specific risks and impacts to the community arising from Project activities, including, inter alia, behavior of Project workers, risks of labor influx, response to emergency situations], and include mitigation measures in the ESMPs.</p>	As an integral part of the site-specific ESMP activity will follow similar timeline as that prescribed under 1.1.	MESDNRD and PIU
4.3	<p>SEA AND SH RISKS</p> <p>Prepare and implement a SEA/SH Action Plan as a stand-alone plan, to assess and manage the risks of SEA and SH.</p>	Prepare the SEA/SH Action Plan before commencement of works, and thereafter implement the SEA/SH Action Plan throughout Project implementation	MESDNRD and PIU
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT			
5.1	<p>RESETTLEMENT [FRAMEWORK] [PLAN] or [PLANS]</p> <p>1. Ensure that all physical investments under the project exclude private land. Prepare and implement a Livelihood Restoration Plan (LRP)/for KAP and Niksic project sites, if required under the Project as set out in the ESIA for KAP and Niksic consistent with ESS5.</p>	Prepare and implement the respective LRP prior to carrying out the relevant works, including ensuring that before taking possession of the land and related assets, livelihood assistance has been provided as per LRP.	MESDNRD and PIU
ESS 8: CULTURAL HERITAGE			

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
8.2	<p>CHANCE FINDS</p> <p>Require contractors to implement the chance finds procedure that is part of the ESIA/ESMP of the project, including training supervisors and workers in their responsibilities.</p>	Describe the chance finds procedures in the ESIA/ESMP following similar timeframe for the preparation and implementation of the ESIA/ESMPs under 1.1. and thereafter implement the procedure throughout project implementation.	MESDNRD and PIU
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	<p>STAKEHOLDER ENGAGEMENT PLAN</p> <p>Prepare 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.</p>	Prepare the SEP prior to appraisal. Thereafter, update and implement the SEP throughout Project implementation.	MESDNRD and PIU
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>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.</p> <p>The grievance mechanism shall be further 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.</p>	Establish the basic grievance mechanism prior to Appraisal thereafter fully establish within 6 months of project effectiveness. Thereafter maintain and operate the mechanism throughout Project implementation.	MESDNRD and PIU
INDICATORS FOR IMPLEMENTATION READINESS			
The following actions are indicators for implementation readiness:			

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<ol style="list-style-type: none"> 1. Establishment of the Project Implementation Unit (PIU) with adequate E&S personnel (A above) 2. Recruitment and training of E&S staff within PIU (B above) 3. E&S assessments and plans to be prepared by the Borrower, through PIU prior to tendering of the works (1.1 above). 		