



**Ministry of Ecology, Sustainable Development, and Northern
Region Development**

STAKEHOLDER ENGAGEMENT PLAN (SEP)

**Prepared for
Waste Management Reform Project**

(v.2)

5th March 2026

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1 Introduction

The Waste Management Reform Project is financed by the World Bank and implemented through the Ministry of Ecology, Sustainable Development and Northern Region Development (MESDNRD), via the Project Implementation Unit (PIU).

In accordance with the World Bank Environmental and Social Framework (ESF), this Stakeholder Engagement Plan (SEP) has been prepared in line with the requirements of Environmental and Social Standard 10 (ESS10) – Stakeholder Engagement and Information Disclosure.

The SEP establishes a framework for systematic, transparent, and inclusive engagement of stakeholders throughout the entire project life cycle, with the objective of strengthening environmental and social risk management, enhancing public trust, and ensuring responsible implementation of project activities.

The SEP is a living document and will be updated during project implementation to reflect changes in project scope, availability of information, progress in preparation and implementation of project activities, outcomes of stakeholder consultations, and results of monitoring of stakeholder engagement effectiveness.

This Stakeholder Engagement Plan (SEP) represents the overarching, project-level SEP for the Waste Management Reform Project. The document defines the overall framework, principles, procedures, and minimum requirements for stakeholder engagement in accordance with Environmental and Social Standard 10 (ESS10) of the World Bank. For specific project components and locations with particular or heightened environmental and social risks, separate, site-specific Stakeholder Engagement Plans (site-specific SEPs) will be prepared, disclosed, and implemented prior to commencement of site-specific activities. These site-specific SEPs will operationalize the requirements of this project-level SEP at the level of the specific location and the associated ESIA/ESMP documentation.

1.1 Scope and objectives

This SEP applies to all components and phases of the Waste Management Reform Project, including the project preparation phase, the preparation of environmental and social documentation, the implementation phase, and the project completion phase.

This document defines the project-level framework for stakeholder engagement, while detailed stakeholder identification, engagement methods, consultation schedules, and local communication channels are elaborated through dedicated, site-specific SEPs prepared for project components and locations with specific environmental and social impacts. Site-specific SEPs form an integral part of the relevant ESIA/ESMP packages and are fully aligned with this document and the requirements of ESS10.

The objectives of this Stakeholder Engagement Plan (SEP) are to:

- identify all relevant project-affected parties and other interested stakeholders, including vulnerable and disadvantaged groups;
- ensure the timely disclosure of accurate, relevant, and understandable information regarding the project, its activities, timeline, potential environmental and social risks, and risk management measures;
- enable meaningful participation of stakeholders in the processes of project planning, preparation of environmental and social documentation, and project implementation, in a manner proportionate to the nature and risks of project activities;
- ensure that the views, concerns, and suggestions of stakeholders are duly considered and, where feasible, integrated into decision-making processes, including the development and implementation of environmental and social risk management measures;
- ensure a tailored and inclusive approach to engaging vulnerable and disadvantaged groups, in order to remove barriers to participation and provide equitable access to information and consultations;
- establish an effective, accessible, and transparent Grievance Redress Mechanism (GRM) that enables the timely receipt, review, and resolution of concerns and grievances related to the project;

- ensure systematic documentation and reporting on stakeholder engagement activities, consultation outcomes, and the functioning of the GRM.

1.2 Project description

The Waste Management Reform Project aims to improve the waste management system in Montenegro through institutional reforms, infrastructure investments, and the remediation of existing environmental liabilities, while applying good international practices and the World Bank’s environmental and social standards. The Project consists of the following components and subcomponents:

Component 1: Waste Management Governance and Institutional Development

This component focuses on strengthening the regulatory framework, enforcement mechanisms, and institutional capacities involving national authorities, sector institutions, municipal administrations, public utility companies, private waste operators, and relevant sector stakeholders, with explicit integration of gender inclusion, equitable access to participation, and inclusive decision-making processes. Activities support implementation of the Waste Management Law and the National Waste Management Plan through regulatory alignment with the EU waste acquis, improvement of data collection systems, transparency mechanisms, inter-institutional coordination, and structured engagement of public institutions and service providers. Gender inclusion and climate resilience are mainstreamed across institutional, regulatory, and operational structures, ensuring equitable participation of women and men in capacity-building activities, institutional processes, and stakeholder engagement mechanisms.

Subcomponent 1.1: Technical Assistance to strengthen the regulatory framework

This subcomponent engages ministries, regulatory bodies, inspectorates, municipalities, waste operators, and producer responsibility organizations in the development, revision, and harmonization of the waste management regulatory framework. Activities include preparation of by-laws, rulebooks, and technical guidance for municipal waste services, EPR systems, hazardous and industrial waste management, electronic reporting and monitoring systems, and construction and demolition waste regulation, supporting coordinated implementation by responsible public institutions and regulated stakeholders.

Subcomponent 1.2: Building institutional capacity for improved waste management

This subcomponent focuses on capacity building for national and municipal authorities, public utility companies, private waste operators, and institutional service providers. Activities include training programs, workshops, certification schemes, and on-the-job training in waste collection, sorting, recycling, treatment, regulatory compliance, and EPR implementation, with gender-inclusive access to capacity-building opportunities, as well as upgrading and integration of national and municipal waste information systems used by public institutions and sector operators.

Subcomponent 1.3: Public awareness, behavioural change and municipal support for improved waste management

This subcomponent engages municipalities, local communities, schools, civil society organizations, media, and public institutions in structured awareness raising, behavioural change, and local capacity building. Activities include development of national and local communication plans, implementation of public awareness campaigns, behavioural change interventions in selected municipalities, and differentiated technical and financial support to municipalities based on performance and readiness levels, with gender-responsive communication approaches and inclusive participation of women and men in community engagement activities, supporting local administrations and community stakeholders in improving waste management practices.

Component 2: Waste Management Infrastructure Improvements

This component focuses on infrastructure development and operational cooperation among municipalities, public utility companies, technical service providers, and waste management professionals through the establishment of a regional waste management system centred in Nikšić. Activities support inter-municipal cooperation, service delivery structures, infrastructure operation, and professional capacity development in compliance with EU environmental standards.

Subcomponent 2.1: Establishment of Nikšić Regional Waste Management Centre

This subcomponent supports the development of a regional waste management system serving the municipalities of Nikšić, Šavnik and Plužine possibly complemented with Kotor, Herceg Novi, and Žabljak, who will experience improved waste management services, environmental conditions, and public health outcomes through the establishment of the Regional Waste Management Centre in Nikšić. Activities include construction and operation of the Waste Management Centre in Nikšić, development of dual waste collection systems in participating municipalities, establishment of Civic Amenity Centres (CACs) in Šavnik and Plužine for citizen delivery of recyclable materials, development of basic CAC infrastructure, provision of transport equipment for recyclables, and organization of waste flows between municipalities and the regional centre. Stakeholders include municipal administrations, public utility companies, local communities, citizens, and regional waste service providers.

Subcomponent 2.2: Establishment of a Training and Knowledge Sharing Hub for Modern Waste Management Practices

This subcomponent engages municipal staff, waste management professionals, public institutions, educational institutions, and citizens through the establishment of a Training and Knowledge Sharing Hub within the Nikšić Waste Management Centre. Activities include development of training strategies, curricula, digital learning platforms, professional training programs, workshops, structured knowledge exchange activities, and educational spaces for citizens, pupils, and students.

Component 3: Remediation of Waste Disposal Sites

This component focuses on environmental remediation and risk reduction at legacy waste disposal sites through coordinated action by national institutions, environmental authorities, technical service providers, and regulatory bodies, with the objective of reducing environmental and public health risks and strengthening national systems for hazardous and industrial waste management.

Subcomponent 3.1: Remediation of Waste Disposal Sites (KAP)

This subcomponent supports the remediation of the solid waste disposal site at the KAP production plant location through activities involving national environmental institutions, technical operators, and regulatory authorities. Activities include construction of temporary storage facilities within the KAP site, construction of permanent engineered disposal basins with multi-layer containment systems, controlled handling, storage, encapsulation, and permanent isolation of hazardous and contaminated waste materials, and assessment of long-term institutional and infrastructure solutions for hazardous waste management in Montenegro. The KAP site represents the central operational and environmental focus of this subcomponent.

Component 4: Project Management

This component supports project implementation through coordinated engagement of the implementing agency, Project Implementation Unit (PIU), Technical Support Unit (TSU), national institutions, and the World Bank. Activities include project coordination, staffing, operational management, procurement, financial management, environmental and social

safeguards implementation, monitoring and evaluation systems, reporting mechanisms, and structured coordination among institutional stakeholders involved in project delivery.

2 Stakeholder engagement consultation and disclosure requirements

The following two sections present the main international and international requirements which guide development and implementation of this SEP.

2.1 National requirements

National requirements related to stakeholder engagement are not as explicit as the requirements stipulated by ESS10. However, this section presents a set of national legislative requirements and strategic documents from the area of environmental protection and waste management which are applicable to the overall implementation of this project. Additionally, the legislative framework presented below provides an overview of the wider context related to management of the social context and the pertaining rights which are to be provided and guaranteed to all the relevant project stakeholder, not only throughout the stakeholder engagement activities, but also through project implementation itself.

Table 1. Legal and Regulatory framework

National environmental and Social Policies and Regulations	
Strategic documents	
State Waste Management Plan for the Period 2025–2029	The Plan sets the national framework, priorities, and measures for waste management for the period 2025–2029, including measures relevant to remediation and rehabilitation of waste disposal sites, in line with the national waste management system and implementation arrangements adopted at the state level.
Legislation	
Law on Environment (“Official Gazette of Montenegro”, No. 052/16, 073/19)	This Law establishes the principles of environmental protection and sustainable development, as well as instruments and measures for environmental protection and other issues of relevance for environmental governance.
Law on Waste Management (“Official Gazette of Montenegro”, No. 034/24, 092/24)	This Law regulates the waste management system, responsibilities and requirements for waste management activities, and other matters relevant for waste management in Montenegro.
Law on Free Access to Information (“Official Gazette of Montenegro”, No. 044/12, 030/17)	This Law regulates the right of access to information and the procedure for exercising this right in relation to information held by public authorities, including rules relevant for information disclosure.
Law on Gender Equality (“Official Gazette of the Republic of Montenegro”, No. 46/07 and “Official Gazette of Montenegro”, No. 73/10, 40/11, 35/15)	This Law regulates the achievement of gender equality and the exercise of rights on the basis of gender equality, including measures aimed at eliminating discrimination based on sex and ensuring equal opportunities.
Law on Prohibition of Discrimination (“Official Gazette of Montenegro”, No. 46/10, 40/11, 18/14, 42/17)	This Law regulates prohibition and protection from discrimination and the promotion of equality, including the legal basis for prevention of discriminatory practices.
Law on Minority Rights and Freedoms (“Official Gazette of the Republic of Montenegro”, No. 031/06, 051/06, 038/07 and “Official Gazette of Montenegro”, No. 002/11, 008/11, 031/17)	This Law prescribes the position and rights of minority groups and provides the legal basis for the exercise and protection of minority rights and freedoms.

National environmental and Social Policies and Regulations	
Law on the Protector of Human Rights and Freedoms of Montenegro (“Official Gazette of Montenegro”, No. 42/11, 32/14, 21/17)	This Law regulates the competence, powers, and functioning of the Protector of Human Rights and Freedoms in relation to the protection of human rights and freedoms guaranteed by the Constitution, laws, and ratified international human rights instruments.

2.2 International requirements

Considering that the Project is implemented in line with the World Bank Environmental and Social Standards, it is essential that all applicable requirements related to stakeholder engagement are duly taken into account and consistently applied throughout project implementation.

This Stakeholder Engagement Plan (SEP) has been prepared in accordance with the World Bank Environmental and Social Standard ESS10: *Stakeholder Engagement and Information Disclosure*. In addition to ESS10, the SEP reflects the principles set out in the *Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in Programme Proposals for Bilateral German Technical and Financial Cooperation* and the *Principles for Digital Development*. With regard to the Principles for Digital Development, particular attention is given to the principle of *Address Privacy and Security*, as relevant for the implementation of this SEP.

The World Bank ESS10, together with the accompanying Guidance Note on Stakeholder Engagement and Information Disclosure, defines stakeholder engagement as a transparent, inclusive, and meaningful process of consultation and engagement that is to be carried out throughout the entire project life cycle and that promotes stakeholder feedback and participation. The stakeholder engagement process is developed in a systematic manner, enabling the Borrower to “build and maintain constructive relationships” with all project stakeholders. All stakeholder engagement–related processes and activities are designed to ensure efficient and inclusive engagement with all stakeholder groups, with particular attention paid to vulnerable and disadvantaged groups, in order to ensure their meaningful participation in the stakeholder engagement process.

Furthermore, the client is required to ensure full, informed, and continuous participation and information sharing with all relevant stakeholders throughout all project phases. This is achieved through timely disclosure of information, stakeholder consultations, and the establishment and implementation of an effective grievance mechanism, all of which are based on principles of informed consultation and participation. Accordingly, this SEP is intended to ensure comprehensive participation and involvement of all relevant project stakeholders, with the objective of enabling an early, systematic, and effective approach to the identification and mitigation of potential social impacts.

For the purpose of ensuring effective implementation of the above-mentioned principles of good international practice, this SEP is structured around and includes the following key components: stakeholder engagement approach; stakeholder identification and analysis; stakeholder engagement programme; and the grievance mechanism.

Moreover, Montenegro has ratified a number of international treaties and conventions, alongside an ongoing process of harmonisation of national legislation with the EU *acquis* within the domestic legal and policy framework. Further details regarding the relevant conventions, along with the abovementioned WB standards, are presented below.

- The World Bank Environmental and Social Framework, with particular emphasis on ESS10 (Stakeholder Engagement and Information Disclosure);
- The World Bank Guidance Note on ESS10: Stakeholder Engagement and Information Disclosure, 2018;
- Core Labour Standards of the International Labour Organization (ILO); Guidelines on Incorporating Human Rights Standards and Principles, Including Gender, in

Programme Proposals for Bilateral German Technical and Financial Cooperation; Aarhus Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters, 1998.

The Aarhus Convention (Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters) has been an integral part of the national legal system since 2009. Access to justice in environmental matters is regulated through a number of legislative acts that fully transpose the relevant EU provisions governing public access to environmental information and public participation in environmental decision-making, while remaining fully aligned with the Aarhus Convention. The primary objective of this Convention is to “guarantee the rights of access to information, public participation in decision-making and access to justice in environmental matters”. In this regard, it establishes provisions that ensure “accountability and transparency in decision-making and strengthen public support for environmental decisions”. Aarhus convention “recognises that the public must be informed about participation procedures in environmental decision-making, have free access to such procedures and be aware of how to use them”; and it “acknowledges the importance of the roles that individual citizens, non-governmental organisations and the private sector can play in environmental protection”.

Montenegro has ratified the Espoo Convention on Environmental Impact Assessment, its two amendments, and the SEA Protocol to the Espoo Convention (Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessment) (“Official Gazette of Montenegro”, No. 02/09).

The Convention for the Protection of Human Rights and Fundamental Freedoms was ratified by Montenegro in 2003, with the main objective of ensuring the application of objective standards and enabling individuals to seek protection against the misuse of authority.

The European Social Charter guarantees the realisation of fundamental social and economic rights without discrimination. Rights ensured under the Charter include the right to work, the right to social and medical assistance, and the right to social, legal and economic protection of the family, with particular importance attached to the protection and assistance of migrant workers and their families.

3 Stakeholder identification and analysis

Stakeholder identification and analysis is done on the basis of the scope of the planned project, whereby some of the main inputs for stakeholder identification and analysis are going to be obtained throughout the stakeholder engagement activities which are going to be implemented as part of development of this SEP. The stakeholder engagement activities are primarily planned to be carried out on KAP site, as this project has the necessary degree of maturity at this stage. When it comes to the Niksic WMC, stakeholder engagement is going to be carried out when the technical documentation for the project is developed. SEP is going to be updated after both of the abovementioned stakeholder engagement processes, and the necessary amendments are going to be integrated into the updated SEP accordingly.

However, for the purpose of this draft, the sections below present the main stakeholders which have been identified in the course of implementation of the previous project phase (development of ESIA and EIA in 2022 – for KAP site), as well as those stakeholders which have been identified through desk analysis (for all project components) and site visit (for KAP site) which have been implemented for the purpose of this assignment.

3.1 Methodology

Diverse nature of the project activities, including all components and sub-components, led to development of SEP which presents stakeholders in the context of the wider (general) project activities, as well as in the context of specific, on-site project activities. The stakeholders in this SEP are initially categorised on project-level, while they are subsequently divided per their respective roles in the project and they are finally presented on the level of individual stakeholders which have been recognised for the on-site activities.

Stakeholders' identification was carried out based on the following considerations:

- the scope of project activities and the locations where such activities will be implemented;
- potential environmental and social risks, including both temporary and long-term impacts;
- institutional mandates, roles, and responsibilities within the waste management and environmental protection sectors;
- interests in, and influence over, project implementation (e.g. institutions responsible for permitting, inspection, provision of public services, or involvement in planning processes);
- the need for specific engagement measures targeting vulnerable and disadvantaged groups.

Stakeholders are classified into two main categories: Project-Affected Parties (PAPs) and Other Interested Parties (OIPs). Since this project includes a wide range of activities, both on site activities and office-based activities, the range of stakeholders is going to be presented in the context of the abovementioned types of project activities. This is done in order to account for the varying potential impacts, roles and interests of stakeholders in the project.

In addition to these two main groups, the Project Beneficiaries are recognised as an important group of stakeholders, primarily due to complexity and the number of project activities since their implementation if going to require ongoing communication and cooperation between these parties.

Prior to presenting the stakeholder groups, it is important to make a clear distinction between the project components which belong to the on-site activities and the components which belong to the office-based activities. The reason for this lies in the fact that these two types of projects are going to require different approaches to stakeholder engagement, which is primarily due to the different nature of these two sets of activities. Thereby, the division of the project activities which represents the basis of this SEP is:

- > **On site activities:** Subcomponent 2.1 (Establishment of Nikšić Regional Waste Management Centre) and Subcomponent 3.1 (Remediation of Waste Disposal Site KAP).
- > **Office-based activities:** Component 1 (Waste Management Governance and Institutional Development), including all three of its subcomponents; Subcomponent 2.2 (Establishment of a training and knowledge sharing hub for modern waste management practices) and Component 4 (Project Management)

3.1.1 Project-Affected Parties (PAPs)

Project-Affected Parties include individuals or groups that may be directly or indirectly affected by project activities.

For office-based activities:

- Participants in capacity-building programs, workshops, certification programs, and on-the-job training
- Public utility companies, private waste collection operators
- Municipal staff
- Professionals
- Vulnerable and disadvantaged individuals and groups

For on-site activities:

RWMC Nikšić

- workers in Željezara, as parts of the object are in active use for business operations which need to be fully aligned with construction and operation of the WMC, so as to avoid any disruptions to either party during construction and operation;
- residents living in the vicinity of the WMC site and along access roads, who may be exposed to temporary impacts during construction (such as noise, dust, and increased traffic);
- local households and businesses within the area of influence, including those potentially affected by changes in traffic patterns or access restrictions during construction works;
- local municipal utility companies and their employees, as well as operators involved in the functioning of the waste management system;
- Municipality Nikšić both in terms of the subject project, and their individual investment related to transfer station within the overall facility;
- municipal authorities in Šavnik, Plužine as the definitive users of the RWMC, and Kotor, Herceg Novi and Žabljak as potential users of the RWMC;
- Civic Amenity Centres in Šavnik and Plužine;
- vulnerable and disadvantaged individuals and groups.

KAP Solid Waste Site

- residents within the project's area of influence who may have concerns related to contamination management, dust generation, and safety during remediation activities;
- formal and informal users of surrounding land and space (to the extent identified as relevant), including entities located in the immediate vicinity of the site;
- entities operating within the industrial zone and other nearby land users;
- workers engaged in remediation works and associated activities;
- local utility companies and providers of communal services in the area (water supply, waste management, etc.);
- Montenegrin Electricity Distribution Company (CEDIS), since one of their OHL towers is located in the middle of the waste site;
- vulnerable and disadvantaged individuals and groups.

3.1.2 Vulnerable and disadvantaged individuals and groups

Vulnerable and disadvantaged groups may include elderly persons, socially vulnerable households, persons with disabilities, women at disadvantaged positions, households with limited access to digital communication channels, waste pickers, and other groups that may face barriers in accessing information and participating in consultations.

Targeted and tailored engagement measures will be applied for these groups, including the use of a combination of digital and non-digital communication channels, adaptation of information formats, selection of accessible venues and timings, and the organization of targeted information sessions in smaller groups, where necessary.

3.1.3 Other Interested Parties (OIPs)

Other Interested Parties include institutions, organizations, and groups that have an interest in the Project or may influence its implementation, including:

- the Ministry of Ecology, Sustainable Development and Northern Region Development (MESDNRD) and the Project Implementation Unit (PIU);
- Technical Support Unit (TSU);
- the Environmental Protection Agency;
- Pollution data collection and monitoring agencies
- local governments involved in project activities;
- relevant line ministries and state authorities, in accordance with their mandates;

- non-governmental organizations active in the fields of environmental protection, public health, transparency, waste collection and management, and public participation;
- community based organisations in the field of waste management and public health in the relevant municipalities, including waste pickers;
- the academic and professional community;
- SEA/SH referral services such as health, legal, police, shelters etc..
- Accident and Emergency response services
- Traffic management agencies
- Relevant agencies/operators in waste collection and disposal
- the media.

OIPs are generally the same for both the on-site activities and the office-based activities, as they represent stakeholders who have general and wider interest in the project as a whole and its implementation.

3.1.4 Project beneficiaries

The project will benefit a wide range of stakeholders at the national, municipal, and community levels through strengthened waste management systems, improved infrastructure, and reductions in environmental risks. Under Component 1, the primary beneficiaries will be national institutions and municipalities across Montenegro, which will gain improved institutional capacity, technical skills, and regulatory support to implement the Waste Management Law, the National Waste Management Plan and corresponding Local Waste Management Plans. Municipalities will also benefit from targeted technical assistance leading to the service improvements. Under Component 2, the main beneficiaries will be the citizens of municipalities of Nikšić, Šavnik, and Plužine, possibly complemented with Kotor, Herceg Novi, and Žabljak, who will experience improved waste management services, environmental conditions, and public health outcomes through the establishment of the Regional Waste Management Center in Nikšić. This facility will serve 75,000 or more residents and support sustainable recycling and waste processing in line with EU environmental standards. Under Component 3, the communities near the KAP site in Podgorica will benefit from the remediation of a contaminated site for waste disposal, reduced environmental and health risks, and the rehabilitation of degraded land for potential economic use. Indirect beneficiaries will include private waste operators, educational and training institutions, and civil society organizations engaged in awareness, training, and capacity-building activities that will foster a culture of sustainable waste management across the country.

3.2 On-site stakeholder identification and analysis

Stakeholder identification for the on-site project activities has only been commenced for the KAP solid waste site. As previously mentioned, this project has reached a certain level of maturity, in the sense that the location and scope of works have been duly defined through the Main Design.

3.2.1 KAP Solid Waste Site stakeholder identification

Stakeholder identification in the Aol was done primarily on the basis of site visit, which was carried out in December 2025 for the purpose of this assignment. It is important to note that the site visit was conducted as a preparatory activity for the planned socio-economic survey in the Aol, thus the site visit had its limitations since the area which is adjacent to the Solid Waste Disposal Site is characterised by an illegal settlement. Information about the exact period of establishment of this settlement could not be found in any official sources, nor could this information be provided by the KAP management, but it was definitely built prior to official closure of the solid waste disposal site in 2012. The reason why this settlement is illegal is due to the fact that these objects were built without permits, on state and local government land, and these objects have never been legalised, albeit they are still used. However, despite the fact that the national and local authorities have not resolved the status of these objects, the people who use these objects represent the primary stakeholders who are going to be subject to stakeholder engagement activities which are going to be carried out for the purpose of this project.

Although several residential structures are located within the broader Project area of influence, the project design has been developed in a manner that avoids any physical intervention on existing residential buildings. The primary project-related risks to nearby residents are associated with

temporary activities during remediation works, including excavation, waste handling, and increased vehicle movement. Potential impacts may include:

- dust emissions,
- elevated noise levels, and
- temporary disturbance related to construction activities.

To manage these risks, the Contractor will implement specific mitigation measures defined in the ESMP, including:

- controlled access and fencing of work areas;
- dust suppression and air quality control measures;
- safe handling and transport procedures for contaminated materials;
- noise management measures and scheduling of works where feasible;
- environmental supervision and compliance monitoring throughout implementation.

Given the sensitivity of the local community and the presence of informal housing, proactive communication with residents is considered essential. The Project will therefore:

- maintain continuous stakeholder engagement throughout preparation and implementation phases;
- establish clear communication channels between residents and project representatives;
- coordinate activities among the Employer, Contractor, Supervising Engineer, and local authorities; and
- ensure advance notification of works that may temporarily affect nearby residents.

A Project-level Grievance Redress Mechanism (GRM) will be established prior to commencement of works. The GRM will allow residents to submit concerns or complaints and receive timely, transparent responses.

When it comes to the illegal settlement, socio-economic survey was done in this area, so as to identify the social baseline among the residents in the project area. The survey identified the total of 46 housing units in the project area (some residential objects are multi-housing unit objects, i.e. 2-4 families live in some objects).

- 6 units were identified as uninhabited;
- the surveyors could not find anyone home in 9 housing units (these objects are used, but residents were not found during the survey period);
- 14 households rejected participation in the survey;
- 17 households participated in the survey.

These households are considered sensitive receptors, and the environmental sampling plan includes locations near these units as well as nearby formal settlements such as Botun, to ensure that remediation effectively addresses potential exposure pathways.

It should be noted that these informal residential units are not within the scope of expropriation or land acquisition for the Project. Furthermore, as stated above remediation works will be implemented in a manner that ensures that these houses are not physically affected, and that access to homes and basic services will not be restricted or disrupted during Project implementation. The Project does not provide housing or land solutions for these informal units, but remediation activities will reduce environmental risks to nearby communities, including these households.

In addition to the illegal settlement, the Solid Waste Disposal Site is surrounded by other entities, as follows: Red Mud Basin, which is owned by a private company WEG Kolektor LLC; unregulated scrapyards (owner/manager unknown); a private company (Termoelektro LLC), which is located on land owned by the owner of the Aluminum Plant and does not have any land titles; and Aluminum Plant Podgorica, which is owned by UNIPROM LLC.

In addition to the abovementioned stakeholders, this SEP also includes national and local authorities which are essential for project planning and implementation, as well as for implementation of this SEP. Due to their active role in this project, Ministry of Ecology, Sustainable Development and Northern

Region Development (MESDNRD) represents the main institutional stakeholder, along with the Environmental Protection Agency (EPA). In addition to these institutions, The Capital Podgorica and Municipality Zeta represent key stakeholders who are going to be essential for project implementation from the aspect of land titles and local services management during the project. Coupled with them are the local municipal waste service companies (both from the Capital Podgorica and Municipality Zeta), as well as other local services (water services, utilities, etc.). Finally, Montenegrin Electricity Distribution System (CEDIS) is an important stakeholder since one of their OHL lines is located in the middle of the Solid Waste Disposal Site, and this aspect is going to have to be managed and agreed upon in coordination with CEDIS during the construction works, so as to ensure preservation and proper management of public infrastructure and services in the area.

3.2.2 KAP Solid Waste Site stakeholder analysis

The remediation of the historical hazardous waste disposal site and its area of influence is characterised by a number of diverse stakeholders, ranging from households without land titles adjoining the site, to private companies, and public service providers. The complexity of stakeholder structure for this project may also be recognised on institutional level, considering the fact that the project area has still not been administratively divided (in terms of land titles) between the Capital Podgorica and the recently established Municipality Zeta. All of these circumstances are going to require implementation of an ongoing stakeholder engagement process, throughout all project phases.

The phase of stakeholder engagement with institutional stakeholders (national and local institutions) and operator of the KAP facilities showed that they are highly interested in this project, and that they want to be informed and consulted during all project phases. Moreover, the process of providing feedback to stakeholders based on their involvement and comments provided during the disclosure phase is ongoing and the finalisation of this process is directly linked to the ongoing surveys which are being implemented on site in order to determine baseline conditions (soil, noise, groundwater quality, etc.) in the project area. The results of the ongoing site surveys are going to be used as the basis for providing responses to stakeholders' comments, and it is only then that the stakeholder feedback may be provided in relation to the versions of documents disclosed in February 2026. Thus, taking into account the ongoing interaction between the Ministry, the institutional stakeholders and operator of the KAP facilities, the dynamics of this relationship are going to be monitored and analysed throughout all project phases, so as to ensure that any changes in the stakeholders, their dynamics, interests, etc. are duly updated and reflected in this SEP.

Local community in the project area was subject to socio-economic survey, which was implemented from 12th until 16th February 2026. The survey identified the total of 46 housing units in the project area (some residential objects are multi-housing unit objects, i.e. 2-4 families live in some objects), as follows: 6 units were identified as uninhabited; the surveyors could not find anyone home in 9 housing units (these objects are used, but residents were not found during the survey period); 14 households rejected participation in the survey; 17 households participated in the survey. Housing conditions in the settlement are generally poor. Most interviewed households live in deteriorated shacks located on public land, often without formal documentation for the structures or the land. Despite these conditions, most respondents reported stable livelihoods. The majority of respondents are formally employed and belong to low- to medium-income households, and the survey confirmed that residents are not engaged in waste picking as a source of livelihood. The community has lived in the area for many years, with an average reported residence of around 20 years. Access to basic services is limited, particularly in relation to water supply and sanitation. Minority groups were not identified as predominant in the settlement, although surveyors noted that a small number of families may have Roma or Albanian origin. The survey also showed that not all households were interested in participating in the research. However, those who did participate were cooperative and open during the interviews, and they left the possibility for further communication during project implementation, as all the respondents recognise the significance of remediation of the solid waste dump site. Some respondents are not only concerned about the living conditions, but they also raised the concern regarding potential loss of shelter/home. It should be emphasised that this project is not going to lead to physical resettlement, as the project is not going to require any demolition of objects in the surroundings. This was clearly communicated to all the respondents, and they were all provided with project leaflets. Finally, it is important to note that the project leaflets presented information about the public consultation meeting (which was upcoming at the moment of implementation of the survey) and they were also invited by the Ministry, however the PCM was not attended by any member of the local community. Still, the following project phases are going to include ongoing and meaningful communication and engagement with the local community, so

as to ensure that they are duly consulted with throughout all project phases, and so that their potential concerns are duly addressed in all project phases.

The site-specific ESIA is under preparation based on the preliminary design. The draft ESIA with embedded ESMP was also be consulted and disclosed to public for feedback. The ESMP shall be part of the Bidding documents for further updating based on the Detailed Designs as required and thereafter its implementation. The Supervision Consultant will be responsible for ensuring the implementation of the ESMP.

Pursuant to national regulatory requirements, a new Environmental Impact Assessment (EIA), will be undertaken as a prerequisite for the issuance of the construction permit.

Baseline data collection is currently in progress, with the final report expected to be finalized and disclosed in May 2026.

3.2.3 Nikšić RWMC stakeholder identification

The stakeholder identification process has recognized the following groups as key parties with potential interest in or influence over the development of the Regional Waste Management Center in Nikšić. Their engagement will be ensured throughout the project lifecycle, in line with the provisions of this Stakeholder Engagement Plan.

- Municipality of Nikšić
- Municipalities expected to use the regional center (e.g., Šavnik, Plužine, Žabljak, Kotor, Herceg Novi)
- Local public utility companies from the participating municipalities
- National power utility company (EPCG)

To be updated once the Feasibility Study and Preliminary Design for the project are ready.

3.2.4 Nikšić RWMC stakeholder analysis

To be completed once the Feasibility Study and Preliminary Design for the project are ready.

4 Stakeholder Engagement Plan

Stakeholder Engagement Plan is based on core principles which are going to be implemented throughout all stakeholder engagement processes. The postulates of stakeholder engagement are defined below, followed by the project-level stakeholder engagement programme.

4.1 Stakeholder engagement goals and objectives

Stakeholder engagement under the Project will be implemented as a continuous and iterative process throughout the entire project life cycle, in accordance with the principles of ESS10. The level and intensity of engagement will be proportionate to the nature of project activities, the level of identified environmental and social risks, and the degree of stakeholder interest.

The stakeholder engagement strategy is based on the following principles:

- timeliness and transparency;
- inclusiveness and accessibility;
- proportionality to risks;
- two-way communication;
- documentation and monitoring;
- **Citizen Engagement:** The project will also engage citizens through various strategies aimed at informing, consulting, collaborating with, and empowering key stakeholders, including agencies, professionals, community partners, and the public. Using online platforms, focus groups, and other channels, the project will ensure broad outreach, particularly to residents near the project sites. Stakeholders will receive clear information on the project's objectives, scope, timelines, and benefits, with their feedback actively sought during planning and construction to minimize disruptions such as traffic and noise while ensuring community

priorities are reflected in implementation. A Grievance Redress Mechanism (GRM) will be established to enhance transparency and facilitate timely resolution of concerns related to construction and institutional development activities. Additionally, a beneficiary satisfaction survey at mid-term will help integrate community insights into project execution for improved outcomes. The project team will develop action plans to address stakeholder feedback and communicate these back through the original engagement channels. The effectiveness of these efforts will be tracked using key indicators, including the percentage of beneficiaries in focus groups or town halls who report satisfaction with the engagement process, as captured in the Results Framework (RF).

4.2 Approach to public consultation and stakeholder engagement

Meaningful consultations are a central element of the stakeholder engagement process and will be conducted in accordance with ESS10. Consultations will be organized as a two-way, inclusive, and continuous process, enabling project-affected and other interested stakeholders to express their views, concerns, and suggestions regarding the Project.

The objective of consultations is to ensure that stakeholder perspectives are taken into account in decision-making related to project activities, environmental and social risk management, and mitigation measures.

4.2.1 Core Principles of Stakeholder Consultations

Stakeholder consultations will be conducted in line with the following principles:

- **timeliness** – consultations will begin at an early stage of the Project and continue throughout the project life cycle;
- **transparency** – relevant information will be disclosed in advance and in an understandable format;
- **inclusiveness** – all relevant stakeholder groups will have opportunities to participate;
- **two-way engagement** – consultations will allow for information sharing and feedback;
- **non-discrimination** – the process will be free from coercion, manipulation, intimidation, or discrimination;
- **proportionality** – the scope of consultations will be commensurate with the nature and level of project risks;
- **documentation** – all consultation processes and outcomes will be recorded.

4.2.2 Timing and Phases of Consultations

Consultations will be conducted during the following phases:

(a) Consultations during the Project Preparation Phase

During this phase, the objective is to familiarize stakeholders with the Project's objectives, scope, and key characteristics, and to identify key issues and concerns.

Activities include:

- initial informational meetings;
- consultations on the draft Stakeholder Engagement Plan (SEP);
- collection of initial comments and suggestions.

(b) Consultations during the Preparation of site-specific Environmental and Social Documentation

This phase aims to enable stakeholders to become familiar with potential environmental and social risks and the proposed management and mitigation measures.

Activities include:

- disclosure of draft ESIA and ESMP documents;
- organization of public hearings and consultation meetings;
- provision of opportunities for written comments within a defined timeframe;
- review of comments and preparation of responses.

(c) Consultations during Project Implementation

During implementation, consultations aim to ensure continuous information sharing and timely resolution of issues arising during project execution.

Activities include:

- regular informational meetings with local communities;
- targeted consultations in cases of temporary impacts (e.g. noise, dust, traffic);
- continuous communication through established channels;
- active use of the Grievance Redress Mechanism (GRM).

(d) Consultations during the Project Completion Phase

In the final phase, consultations aim to inform stakeholders about project results and to collect feedback on the overall implementation process.

Activities include:

- final informational sessions;
- disclosure of summaries of achieved results;
- evaluation of the stakeholder engagement process.

4.2.3 Consultation Methods and Tools

Depending on the project phase and target stakeholder groups, the following consultation methods may be used:

- public hearings and public meetings;
- focus group discussions and thematic workshops;
- individual meetings with institutions and key stakeholders;
- submission of written comments (electronically or by mail);
- online consultations, where appropriate.

The selection of methods will be tailored to the local context, number of participants, and the needs of different stakeholder groups.

4.2.4 Notification of Consultations

Stakeholders will be informed about consultations in a timely manner, including information on:

- date, time, and location;
- agenda and discussion topics;
- availability of relevant documentation;
- methods for submitting comments.

Notifications will be disseminated through official websites, local notice boards, and other appropriate channels, in compliance with minimum advance notice requirements.

4.2.5 Engagement of Vulnerable and Disadvantaged Groups

To ensure meaningful participation of vulnerable and disadvantaged groups, additional measures will be applied, including:

- organization of targeted consultations in smaller groups;
- selection of accessible locations and suitable timings;
- use of clear and understandable language;
- cooperation with local institutions and organizations working with vulnerable groups, where applicable.

4.2.6 Documentation of Consultations and Response to Comments

All consultations will be documented through:

- meeting minutes;
- participant lists (to the extent feasible and in compliance with data protection requirements);
- summaries of comments and questions raised;
- comment–response tables demonstrating how comments were addressed and whether they were incorporated into project documents;
- stakeholder engagement logs which are going to contain information about all stakeholder engagement activities (as detailed in Appendix 3).

4.2.7 Evaluation of Consultation Quality

The PIU will periodically assess the quality and effectiveness of consultations, taking into account:

- the level of stakeholder participation;
- diversity of participants;
- nature and number of comments received;
- stakeholder satisfaction with the consultation process.

The results of such evaluations will be used to improve future stakeholder engagement activities.

4.3 Approach to information disclosure

Information disclosure is a key element of the stakeholder engagement process and will be carried out in accordance with the principles of transparency, accessibility, and timeliness, as required under ESS10.

The objective of information disclosure is to ensure that project-affected and other interested stakeholders have timely access to relevant, accurate, and understandable information about the Project, its activities, potential environmental and social risks, and the measures proposed to manage and mitigate such risks.

4.3.1 Information Disclosed to Date

As part of the Project preparation and in line with applicable requirements, the following documents have been disclosed to date:

- Environmental and Social Impact Assessments (ESIA) for the Remediation of the Solid Waste Disposal Site at the former Aluminium Plant (KAP) site in Podgorica, draft version;
- Stakeholder Engagement Plan (SEP), draft version;
- Labour Management Plan (LMP), draft version and
- Environmental and Social Commitment Plan (ESCP), draft version

4.3.2 Types of Information to Be Disclosed

During the different phases of the Project, the PIU will disclose the following types of information and documents:

- the Stakeholder Engagement Plan (SEP), in both draft and final versions;
- environmental and social documentation prepared in accordance with the ESF, including:
 - Environmental and Social Impact Assessments (ESIA),
 - Environmental and Social Management Plans (ESMP),
 - Non-Technical Summaries (NTS);
- information on planned project activities, timelines, and implementation phases;
- information on potential temporary impacts during implementation (e.g. noise, dust, traffic), including descriptions of mitigation measures;
- information on environmental and social risk management and mitigation measures;
- information on the Grievance Redress Mechanism (GRM), including contact details, submission procedures, and response timelines;
- periodic updates on project progress and key milestones;
- summaries of consultation outcomes and responses to stakeholder comments (comment–response matrices, in summarized form).

The scope and level of detail of disclosed information will be proportionate to the nature of project activities and the level of associated risks. The timing of disclosure is going to be commensurate with the level of readiness of the project documentation, thereby it should already be noted that disclosure for the KAP site is going to occur prior to disclosure for the Nikšić WMC.

4.3.3 Timing and Frequency of Information Disclosure

Information will be disclosed in line with the different phases of the Project, as follows:

- during the project preparation phase: basic information on project objectives, scope, and institutional arrangements;
- prior to public consultations: draft environmental and social documentation, with sufficient time provided for public review;
- during project implementation: regular updates on progress, planned works, and temporary impacts, including advance notice of activities of interest to local communities;
- in the event of significant project changes: information on the changes and associated risks, accompanied by appropriate consultations;
- upon completion of key phases: summary information on achieved results and relevant monitoring and management measures.

Information disclosure will be conducted in a timely manner to enable meaningful stakeholder participation.

4.3.4 Information Disclosure Channels

Information will be disclosed through a combination of electronic and traditional channels to ensure accessibility for a broad range of stakeholders, including vulnerable and disadvantaged groups.

Primary disclosure channels include:

- the official website of the Ministry of Ecology, Sustainable Development and Northern Region Development (MESDNRD);
- the PIU website (if established);
- websites and notice boards of relevant local governments;
- public meetings, workshops, and information sessions;
- local and national media outlets, where appropriate, particularly when rapid dissemination of information is required for activities that may cause temporary disturbances.

4.3.5 Language, Format, and Accessibility

All information and documents will be disclosed in the Montenegrin language, in formats that are clear, understandable, and appropriate for different stakeholder groups.

Measures to ensure accessibility include:

- use of simple and non-technical language in summaries;
- preparation of Non-Technical Summaries for complex technical documents;
- availability of hard copies of documents at municipal offices or other public institutions, where needed;
- adaptation of communication formats for persons with limited access to digital channels.

Special attention will be given to ensuring that information is accessible to vulnerable and disadvantaged groups.

4.3.6 Record-Keeping of Information Disclosure

The PIU will maintain records of all information disclosure activities, including:

- the type of document or information disclosed;
- the date and disclosure channel;
- the target stakeholder group, where applicable;
- the period of information availability.

These records will serve as the basis for reporting to the World Bank and for internal quality control of the stakeholder engagement process.

4.4 Stakeholder Engagement Programme

Table 2: Stakeholder Engagement Programme

Stakeholder	Phase	Topic	Methods	Timing/frequency	Responsibility	Outputs
Office-based activities						
Participants in capacity-building, training, certification and knowledge-sharing programmes	Preparation	Introduction to project objectives, scope and opportunities for participation	Informational sessions; workshops; written materials; email communication	Early stage; as required	PIU/TSU	Attendance lists; training reports; feedback summaries
Public utility companies and private waste collection operators	Preparation	Alignment on project objectives, institutional roles and coordination needs	Coordination meetings; written communication	Early stage; as required	PIU	Attendance lists; training reports; feedback summaries
Municipal staff and municipal service employees	Preparation	Familiarisation with project scope, governance framework, and institutional roles	Workshops; meetings; internal briefings	Early stage; as required	PIU / MESDNRD	Meeting minutes, participants lists
Vulnerable and disadvantaged individuals and groups	Preparation	Access to information and inclusive participation in office-based activities	Targeted information sessions; adapted materials; cooperation with local institutions	As required	PIU	Stakeholder engagement log, meeting minutes
All PAPs and OIPs	Preparation of E&S documentation	Review of potential environmental and social risks and management measures	Disclosure of draft documents; public consultations; written comments	During disclosure period	PIU	Comment-response table and meeting minutes
All stakeholders engaged in office-based activities	Implementation	Continuous information-sharing, transparency and grievance management	Regular updates, meetings as necessary, communication regarding GRM	Ongoing	PIU	Stakeholder engagement log and GRM reports
National institutions, municipalities, training and academic institutions, CSOs	Completion	Communication of project results and evaluation of engagement process	Final information sessions; dissemination of results summaries; feedback collection	End of project	PIU	Final project implementation report, including project results and outcomes
On-site activities (KAP site)						
Residents within Aol	Preparation	Early awareness of remediation activities,	Socio-economic survey, Local community meetings;	Early stage	PIU/Capital Podgorica/Municipality Zeta	Minutes; participant lists; issues log

Stakeholder	Phase	Topic	Methods	Timing/frequency	Responsibility	Outputs
		project scope, and identification of concerns	small-group sessions; information materials			
Entities operating within the industrial zone and nearby land users	Preparation	Coordination of site access, safety arrangements	Individual and group meetings, official correspondence	Early stage	PIU	Stakeholder engagement log, meeting minutes
Local utility companies and communal service providers; CEDIS	Preparation	Alignment on infrastructure protection, service continuity, and technical coordination	Technical meetings; written coordination; site visits	Early stage	PIU / Utilities / CEDIS	Technical notes; written correspondence/plans
PAPs, NGOs, relevant authorities	Preparation of E&S documentation	Review of draft ESIA/ESMP, impacts, and mitigation measures	Disclosure of ESIA/ESMP; public hearings; written comments	Disclosure period	PIU	Comment-response table, meeting minutes
Residents, land users, workers, vulnerable groups	Implementation	Management of temporary impacts (dust, noise, access, safety), information flow, and GRM use	Regular local updates; noticeboards; meetings; targeted engagement; GRM	Continuous	PIU/Contractor/Supervision	Engagement log, GRM register, site visit reports
Local community; local authorities; NGOs	Completion	Communication of remediation results and closure of outstanding issues	Final community meeting; disclosure of results summary	End of project	PIU	Final project implementation report, including project results and outcomes
Nikšić Regional Waste Management Centre (WMC)						
Municipality Nikšić; residents in Aol; local households and businesses	Preparation	Introduction to RMWC concept, scope of works, and identification of local priorities	Public meetings; local consultations; information materials	Early stage	PIU/Municipality Nikšić	Meeting minutes; lists of participants; issues register
Workers in Željezara, service operators, municipal utility companies	Preparation	Coordination of site use, access, safety and operational matters	Coordination meetings and official correspondence	Early stage	PIU	Meeting minutes and coordination notes
PAPs, NGOs, relevant authorities	Preparation of E&S documentation	Review of draft ESIA/ESMP, impacts, mitigation and monitoring measures	Disclosure of ESIA/ESMP; public hearings; written comments	Disclosure phase	PIU	Comment-response table; meeting minutes
Local communities, road users, workers, vulnerable groups	Implementation	Management of construction impacts, safety, access, nuisance, and continuous engagement	Regular updates; site notices; meetings; targeted engagement; GRM	Continuous; before disruptive works	PIU / Contractor / Supervision	Stakeholder engagement log; GRM reports

Stakeholder	Phase	Topic	Methods	Timing/frequency	Responsibility	Outputs
Municipalities which are users of the WMC; local communities; NGOs	Project completion	Communication of outcomes, feedback collection, and evaluation of engagement process	Final information sessions; results summaries; feedback collection	End of project	PIU	Project completion report; stakeholder feedback summary

5 Summary of Stakeholder Engagement Activities

The sections below present an overview of stakeholder engagement and public disclosure activities which were implemented during the public disclosure phase of the project. This update was done in order to present the ongoing stakeholder engagement activities, whereby all the subsequent stakeholder engagement activities are going to be duly recorded and updated as part of this SEP.

5.1 E&S documentation disclosure

First round of E&S documentation disclosure commenced on 4th February, which is when the Ministry of Ecology, Sustainable Development and Northern Region Development published the full E&S package of documentation on the official Government website (disclosed documentation available at: <https://www.gov.me/en/article/esf-documents-for-waste-sector-improvement-project>). The disclosure package includes: Environmental and Social Impact Assessment (ESIA) for Remediation of KAP Solid Waste Area, Stakeholder Engagement Plan (SEP) for the overall project, Environmental and Social Commitment Plan (ESCP) for the overall project, and Labour Management Plan (LMP) for the overall project.

5.2 Stakeholder engagement activities (disclosure phase)

Stakeholder engagement during the disclosure phase was aimed at consultations with the key stakeholders, which was done in order to identify any potential ongoing issues and/or topics that need to be addressed duly during development of ESIA and the overall E&S documentation for the overall project. Thereby, the stakeholder engagement phase included targeted meetings with relevant institutions and stakeholders in order to address technical, regulatory, and institutional matters, which were primarily focused on Remediation of the KAP Solid Waste Area, considering the technical readiness of this sub project.

In addition to the institutional stakeholders, the Consultant carried out identification and analysis of businesses in the vicinity of the project area. Of course, the main business in the area is Uniprom (managing company of the former KAP facility), but there are two other companies in the area which were also officially invited to the consultative meetings, but have still not responded officially to the request. These two other companies are WEG Kolektor, the owner of the Red Mud Basin, and Termoelektro, which is located between the former KAP facility and the project site. In addition to these two formal companies in the project area, there is a car scrapyard in vicinity of the project site. Several attempts have been made to try and identify the manager of this unregulated site, but due to it being an unofficial scrapyard, it was not possible to identify the manager of the site. Thus, when it comes to businesses in the area, the only business which has been actively participating in the consultation process (both the consultative meetings and public consultation meeting) is UNIPROM, while the consultant and the Ministry are going to keep trying to engage with the remaining stakeholders which have been identified in the area.

Meetings were held with:

- the Ministry of Ecology, Sustainable Development and Northern Development, in the context of coordination of project activities and preparation of ESF documentation;
- the Environmental Protection Agency, regarding regulatory requirements and technical aspects of environmental protection;
- the Municipality of Zeta, regarding potential local impacts and institutional cooperation;
- UNIPROM d.o.o., regarding initiatives related to the remediation of the former KAP site.
- The Capital City of Podgorica regarding potential local impacts and institutional cooperation

Outcomes of these stakeholder engagement activities are related to written comments and/or suggestions which the stakeholders provided to the Ministry. These comments/suggestions are currently the subject of review and analysis, in the context of updating ESIA in accordance with outcomes of the overall stakeholder engagement process. Meeting minutes from this stakeholder engagement process are available in Appendix 1 to this document.

5.3 Public Consultation Meeting (disclosure phase)

Public Consultation Meeting dedicated to collecting feedback from stakeholders during the E&S disclosure phase was organised duly, in accordance with the ESS10. Namely, Ministry of Ecology, Sustainable Development and Northern Region Development published the call for public consultation meeting on 6th February (available at: <https://www.gov.me/en/article/public-consultation-meeting-announcement>). The announcement provided information about the PCM which was scheduled for 19th February 2026, at the premises of the Ministry. In addition to this means of communication, this announcement was shared via the following means of communication: the official social media platforms and LinkedIn; non-governmental organization “Ozon” shared this announcement via their website; information was disseminated via electronic newsletter “Ekolog”; the Ministry sent invitations to 38 relevant institutions (local self-government units, public utility companies, private sector companies and NGOs) via email.

Additionally, considering the fact that the socio-economic survey was carried out during February, and prior to the PCM, all the respondents were provided with project leaflets, which also included information about the PCM, as a form of an open invitation for the local community to participate in the PCM. The project leaflet which was distributed during the socio-economic survey is available in Appendix 2. Finally, the Ministry informed a few members of the local community about the upcoming PCM via phone, which serves as an important indicator of the openness and transparency of the public consultation process in this project.

Public Consultation Meeting was held on 19th February 2026, ensuring a period of 13 days between publication and the consultation meeting. The deadline for submission of written comments was initially set for 19th February 2026 and was subsequently extended until 24th February 2026 in order to provide stakeholders with additional time to submit opinions and suggestions. The PCM included an open discussion about the complete E&S disclosure package, in accordance with the presentation of all segments of the project. The Ministry took an active role during the PCM so as to ensure full transparency of the process and early establishment of two-way communication between the Ministry and the relevant stakeholders. This stakeholder engagement activity was successful in the sense that it produced an open discussion, whereby the stakeholders provided their comments and suggestions during the meeting, which they further formalised by sending written feedback to the Ministry after the meeting. All the comments/suggestions received during the PCM are recorded in the Meeting Minutes from the PCM, and are going to be addressed duly throughout the process of updating ESIA, whereby outcomes of stakeholder engagement are going to be included in the updated SEP, as soon as the updates are finalised. Meeting Minutes from the PCM are available in Appendix 3.

5.4 Stakeholder feedback (disclosure phase)

The outcome of the PCM is reflected in a number of written comments and/or suggestions which were provided to the Ministry throughout this process. All of these comments and/or suggestions have been duly recorded by the Ministry, and they are going to be officially addressed and responded to in accordance with the outcomes of the ongoing process of updating ESIA. Any potential changes to the project, stemming from stakeholder engagement, and updates of ESIA documentation, are going to be duly communicated with all project stakeholders.

6 Grievance Mechanism

In accordance with ESS10, a Grievance Redress Mechanism (GRM) has been established under the Project to receive and address concerns and grievances from all project-affected and other interested stakeholders.

The GRM is intended to provide an effective, transparent, accessible, and fair process for submitting questions, concerns, and grievances related to environmental and social aspects of the Project, as well as to the implementation of project activities.

Use of the GRM is free of charge and does not limit the right of complainants to access judicial or administrative remedies.

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-centred manner.

The Grievance Redress Mechanism (GRM) defined under this SEP represents a single, project-wide GRM applicable to all components of the Waste Management Reform Project. Site-specific SEPs may provide for additional local intake channels (e.g. on-site contact persons, physical intake points, or receipt of grievances during local meetings); however, all grievances will be recorded, processed, monitored, and closed through the central GRM system managed by the Project Implementation Unit (PIU), in accordance with the procedures and timelines defined in this document.

6.1 Principles of the GRM

The GRM will be guided by the following principles:

- **accessibility** – the mechanism is open to all individuals and entities;
- **transparency** – procedures and timelines are clearly defined and publicly disclosed;
- **confidentiality** – personal data of complainants will be protected;
- **non-discrimination** – all complainants will be treated equally;
- **non-retaliation** – submission of a grievance will not result in any adverse consequences;
- **timeliness** – grievances will be addressed within defined timeframes;
- **proportionality** – the approach to resolution will be commensurate with the nature and complexity of the grievance.

Special procedures:

- SEA/SH grievances will be handled through confidential and survivor-centred protocols, separate from the general grievance chain, in line with World Bank guidelines.

6.2 Accountability

- The PIU will manage the centralised grievance register (Appendix 6), monitor progress on complaint resolution, and prepare quarterly summaries of GRM performance for internal and World Bank reporting;
- The PIU will ensure grievance data is disaggregated (e.g. by gender, type, vulnerability status) and analysed to identify trends;
- Final decision on complex or escalated grievances will rest with the PIU, which will liaise with relevant Directorates, Working Groups (WGs), and the Technical Services Unit (TSU) under the Ministry of Finance, as needed.

6.3 Eligibility to Submit a Grievance

Grievances may be submitted by:

- any individual or legal entity;
- individuals or groups;
- directly affected or other interested stakeholders;
- community representatives or organizations.

Grievances may be submitted anonymously, should the complainant so wish.

6.4 Channels for Submitting Grievances

Grievances may be submitted through the following channels:

- electronic mail (official PIU email address);
- telephone (PIU contact number);
- written submission (by post or in person at PIU or municipal offices);
- during public meetings or consultations (with recording by the PIU).

GRIEVANCE MANAGER CONTACT INFORMATION

Contact person: Almina Bučan
Position: Grievance Manager
Email: almina.bucan@mers.gov.me
Phone: +382 68 424 671
Address: Eko-efikasna zgrada, Cetinjski put b.b. 81000 Podgorica
Website: <https://www.gov.me/mers>

The official Grievance Form (available in Appendix 5) is going to be duly available via the Ministry's website, at the construction site, as well as at the relevant local self-government offices. Information on the GRM, including contact details and procedures, will be publicly disclosed and regularly updated in the form of Public Grievance Leaflet (Appendix 4), which contains the GRM contact information.

6.5 Grievance Handling Procedure

The PIU head is the person responsible for Grievance Management by ensuring that complaints and feedbacks are received, recorded, and responded and resolved in a timely manner. The grievance handling process consists of the following steps:

Step 1: Receipt and Registration of the Grievance

All grievances received will be registered in a central grievance log maintained by the PIU. Where the identity of the complainant is known, an acknowledgment of receipt will be provided within three (3) working days.

Step 2: Screening and Categorization

The PIU will conduct an initial review to determine:

- whether the grievance is related to the Project;
- the grievance category (e.g. environmental issues, social issues, safety concerns, fatalities and accidents, informational requests, Sexual Exploitation and Abuse/Sexual harassment (SEA/SH));
- the level of complexity and urgency.

This step will be completed within five (5) working days of receipt.

- SEA/SH grievances will be handled through confidential and survivor-centred protocols, separate from the general grievance chain, in line with World Bank guidelines.

Step 3: Review and Resolution

The PIU, in cooperation with relevant institutions, contractors, or competent authorities, will review the grievance and propose appropriate corrective or remedial measures.

The standard timeframe for grievance resolution is fifteen (15) working days. For complex cases, this period may be extended up to thirty (30) working days, with prior notification to the complainant.

Step 4: Response to the Complainant

A written response will be provided to the complainant, including:

- a summary of the grievance;
- actions taken or proposed;
- timelines for implementation of actions;
- information on escalation options if the complainant is not satisfied with the outcome.

Step 5: Closure of the Grievance

A grievance will be considered closed once corrective actions have been implemented or the complainant has accepted the response. The closure status will be recorded in the grievance log.

6.6 Grievance Escalation

If the complainant is not satisfied with the resolution, they may:

- request a review by the PIU management;
- submit the grievance to relevant competent authorities;
- pursue judicial or administrative remedies.

6.7 Grievance Record-Keeping and Reporting

The PIU will maintain an up-to-date grievance registry, including:

- a unique grievance identification number;
- date of receipt;
- subject and category;
- status and timelines;
- actions taken and outcomes.

Aggregated information on grievances will be included in periodic reports to the World Bank, without disclosure of personal data, while the Grievance Registry which is going to be used for managing the overall process is available in Appendix 3.

6.8 Disclosure of GRM Information

Information on the GRM will be:

- included in this SEP;
- made available on the websites of MESDNRD and the PIU;
- presented during public consultations;
- available at municipal offices involved in the Project.

7 Resources and responsibilities

Effective implementation of the Stakeholder Engagement Plan (SEP) requires clearly defined institutional responsibilities, adequate human capacity, and secured financial resources. In line with the requirements of ESS10, roles and responsibilities for SEP implementation are clearly allocated among the key actors involved in project implementation.

7.1 Institutional and implementation arrangements

The Ministry of Ecology, Sustainable Development and Northern Region Development (MESDNRD) is the Project implementing agency and holds overall responsibility for ensuring compliance of the Project with the World Bank Environmental and Social Framework (ESF).

The Ministry of Ecology, Sustainable Development, and Northern Region Development (MESDNRD) will serve as the lead implementing agency, responsible for overall project management, coordination, and oversight. Given its mandate to formulate and implement national waste management strategies, policies, and regulations, as well as to ensure compliance with environmental legislation, the MESDNRD is well positioned to lead the project. The Ministry will provide strategic direction and ensure that project activities are aligned with Montenegro's national environmental and waste management priorities, as well as the country's EU accession agenda. The MESDNRD will work in close collaboration with the Environmental Protection Agency (EPA), which has the regulatory responsibility for monitoring waste flows, issuing environmental and operational permits, and enforcing compliance with waste management regulations. The EPA will play a critical role in providing technical inputs, facilitating regulatory approvals, and ensuring adherence to environmental standards during project

implementation. At the local level, municipalities (which are responsible for the collection, transport, disposal of municipal waste, and the introduction of segregated waste collection for recycling, often through municipally owned public companies) will serve as key implementation partners, particularly under Component 1, which, among others, focuses on strengthening local waste management systems and service delivery. For Component 2, which will support infrastructure improvements in the Municipality of Nikšić, the municipality will take an active role in the implementation of civil works related to the construction of the Nikšić Waste Management Center. This will include facilitating permits, coordinating local engagement, supporting community consultations, and contractual arrangements with participating municipalities. Securing operational finance monitoring and compliance with national construction and environmental regulations as well as World Bank ESF (the compliance of which will be monitored by the municipal environment protection secretariat in coordination with the PIU).

To ensure effective and timely implementation, a Project Implementation Unit (PIU) will be established within the MESDNRD. The PIU will be responsible for day-to-day management, coordination, and technical oversight of all project activities. It will ensure compliance with the World Bank's fiduciary, environmental, and social standards, monitor progress toward achievement of the Project Development Objective (PDO), and prepare all required reports and documentation. The PIU will be composed of the following: a PIU Coordinator, who will provide overall leadership and coordination, serve as the main point of contact with the World Bank, the TSU, and other stakeholders, and ensure timely preparation of work plans, budgets, and progress reports; an Environmental Specialist and a Social Specialist, who will oversee the preparation and implementation of the Environmental and Social Framework (ESF) instruments, monitor compliance with the Environmental and Social Commitment Plan (ESCP), and ensure that environmental and social risks are effectively managed throughout the project cycle; a Civil Engineer (Technical Expert on Waste Management), who will provide technical guidance on design, supervision, and quality assurance of infrastructure works and other technical activities; and a Project Assistant, who will support administrative and logistical functions. The PIU will report directly to the Minister or State Secretary of Ecology, Sustainable Development, and Northern Region Development, ensuring high-level accountability and strong institutional ownership. The PIU will provide regular progress updates (on a monthly or quarterly basis) to the Minister and the World Bank.

To guide strategic decision-making and ensure policy coherence, a Project Steering Committee (PSC) will be established. The PSC will be chaired by the Minister of Ecology, Sustainable Development, and Northern Region Development and will include representatives of key ministries and agencies (e.g., Ministry of Finance, EPA) and participating municipalities (notably Nikšić). The PSC will provide high-level oversight, review implementation progress, ensure alignment with government policies, and address major challenges requiring cross-sectoral coordination. The PSC will convene on a quarterly basis or as needed.

Fiduciary functions, including procurement and financial management (FM) will be handled by the TSU, housed within the Ministry of Finance. The TSU has extensive experience in managing fiduciary aspects of World Bank-financed projects in Montenegro and will ensure compliance with the World Bank's Procurement Regulations for IPF Borrowers and Financial Management Manual. The TSU will manage all procurement processes, maintain accounting records, prepare interim financial reports, and ensure that all financial transactions are carried out in accordance with sound financial control principles. This arrangement leverages the TSU's established systems and institutional capacity to ensure efficiency, transparency, and accountability.

7.2 Roles and Responsibilities

Roles and responsibilities of individual entities, i.e. the most relevant groups of stakeholders which are in charge of project planning, implementation, monitoring and overall project management, are presented in the sections below.

Project Implementation Unit (PIU)

The PIU plays a central role in SEP implementation and is responsible for:

- planning and implementing stakeholder engagement activities in accordance with this SEP;
- identifying and regularly updating the stakeholder list throughout the project life cycle;
- organizing and facilitating public consultations, meetings, and other engagement activities;
- ensuring timely disclosure of information in accordance with Section 7 of this SEP;
- establishing, managing, and overseeing the Grievance Redress Mechanism (GRM);
- maintaining records of consultations, communications, and grievances;
- preparing periodic reports on SEP implementation for submission to the World Bank;
- coordinating with other institutions, local governments, contractors, and consultants on stakeholder engagement activities.

The PIU will designate one or more responsible staff members to oversee stakeholder engagement activities and the functioning of the GRM.

Local Governments

Local governments covered by the Project will have a supporting role in SEP implementation, including:

- assisting in informing local communities about project activities;
- providing venues for public meetings and consultations;
- supporting dissemination of information through local communication channels;
- cooperating with the PIU in addressing grievances related to local-level issues.

Contractors and Consultants

Contractors and engaged consultants will be contractually required to:

- cooperate with the PIU in implementing stakeholder engagement activities;
- provide timely information on planned works that may affect local communities;
- participate in the resolution of grievances related to their activities;
- designate contact persons for communication with the PIU and local communities.

7.3 Human Resources and Capacity

For the implementation of the SEP, the PIU will ensure the availability of adequate human resources, including:

- an environmental and social specialist;
- a staff member responsible for stakeholder engagement and communications;
- administrative support for record-keeping and reporting.

Where necessary, the PIU will organize training for staff and other relevant actors on:

- ESS10 requirements;
- consultation processes;
- grievance management;
- communication with vulnerable and disadvantaged groups.

7.4 Financial Resources

The costs associated with SEP implementation, including:

- organization of consultations and public meetings;
- preparation and dissemination of information materials;
- administration and operation of the GRM;
- training and capacity building activities;

will be covered under the Project budget, through the PIU's operational budget. Ensuring adequate financial resources is considered a key prerequisite for effective SEP implementation.

7.5 Coordination and Reporting

The PIU will establish internal coordination mechanisms to ensure consistent application of the SEP across all phases of the Project.

Reporting on SEP implementation will be carried out through:

- regular project progress reports;
- environmental and social monitoring reports submitted to the World Bank;
- updates to the Environmental and Social Commitment Plan (ESCP), as required.

8 Monitoring and Reporting

Monitoring and reporting on the implementation of the Stakeholder Engagement Plan (SEP) will be carried out throughout the entire project life cycle, with the objective of assessing the effectiveness of stakeholder engagement activities, identifying potential gaps, and ensuring continuous improvement of the engagement process in line with ESS10 requirements.

8.1 Monitoring of SEP Implementation

The Project Implementation Unit (PIU) will be responsible for regular monitoring of SEP implementation. Monitoring activities will include tracking:

- implementation of planned stakeholder engagement activities;
- levels of participation of project-affected and other interested stakeholders;
- effectiveness of communication and consultation methods;
- functioning of the Grievance Redress Mechanism (GRM);
- inclusion of vulnerable and disadvantaged groups.

Monitoring will be conducted on a continuous basis through the collection and analysis of data from records of consultations, communications, and grievances.

8.2 Monitoring Indicators

For monitoring purposes, both qualitative and quantitative indicators will be used, including but not limited to:

- number of consultations and meetings organized by project phase;
- number of participants in consultations, where feasible, disaggregated by stakeholder category;
- number of information disclosure activities, types of information disclosed, and communication channels used;
- number of grievances received through the GRM;
- categories of grievances;
- average response and resolution time for grievances;
- percentage of grievances resolved within defined timeframes;
- number of engagement activities targeting vulnerable and disadvantaged groups;
- stakeholder feedback on the quality and effectiveness of consultations.

These indicators will be regularly reviewed to assess the effectiveness of SEP implementation.

8.3 Reporting

The PIU will prepare reports on SEP implementation as part of regular project progress reporting. Such reports will include:

- a summary of stakeholder engagement activities carried out;
- monitoring results against the defined indicators;

- an overview of grievances received and resolved;
- identified challenges and corrective actions undertaken;
- recommendations for improving stakeholder engagement processes.

Monitoring and reporting at the project level will cover aggregated indicators for all Waste Management Reform Project components. Detailed monitoring and reporting on stakeholder engagement activities at individual locations will be carried out in accordance with the relevant site-specific SEPs and ESIA/ESMP documentation, and the results will be integrated into regular reporting to the World Bank.

8.4 Updating of the SEP

The SEP is a living document and will be updated within 6 months of project effectiveness to further detail out the GM and thereafter during project implementation in the following circumstances:

- in the event of significant changes to the project scope, design, or locations;
- if new or more significant environmental and/or social risks are identified;
- if new stakeholder groups emerge or if the level of interest or influence of existing stakeholders changes;
- if monitoring results indicate that existing engagement measures are insufficient or ineffective.

All updates to the SEP will be consulted upon, disclosed in an appropriate manner, and submitted to the World Bank in accordance with ESF procedures.

8.5 Role of the World Bank

The World Bank will oversee SEP implementation through:

- regular supervision missions;
- review of periodic monitoring and progress reports;
- oversight of the functioning of the GRM;
- provision of recommendations for improving stakeholder engagement practices.

The PIU will cooperate with the World Bank to ensure that stakeholder engagement activities are implemented in accordance with the ESF and good international practice.

9 Appendices

Appendix 1: Meeting Minutes from stakeholder engagement during E&S disclosure phase

MEETING MINUTES NO. 1

INSTITUTION	STAKEHOLDER ENGAGEMENT MoM	
ENVIRONMENTAL PROTECTION AGENCY		
Date		
16.02.2026.		

REMEDIATION OF KAP SOLID WASTE AREA

ATTENDEES	
NAME	COMPANY / INSTITUTION
Svetlana Živković	Environmental Protection Agency (EPA)
Marko Medenica	Environmental Protection Agency (EPA)
Danilo Veljić	Environmental Protection Agency (EPA)
Gordana Đukanović	Environmental Protection Agency (EPA)
Milena Lakić	Ministry of Ecology, Sustainable Development and Development of the North (MERS) – focal point
Almina Bučan	Project Implementation Unit (PIU) – WMRP
Danilo Barjaktarović	Consultant (ESIA team)
Jelena Vukčević	Consultant (ESIA team)
MEETING NOTES	
<p>Ms. Almina Bučan briefed the participants on the project background and scope, including the project lead institution and the parties involved in the preparation of the Environmental and Social Framework (ESF) documentation. The Waste Management Reform Project (WMRP) represents a continuation of the Industrial Waste Management and Cleanup Project (IWMCP), previously implemented in 2022. The current phase focuses on remediation activities at the solid waste disposal site within the KAP industrial area. The project is led by the Ministry of Ecology, Sustainable Development and Development of the North (MERS), implemented in coordination with the Environmental Protection Agency (EPA), and financed by the World Bank. Consulting services are being provided by the ENCON–E3 Consulting Consortium.</p> <ul style="list-style-type: none"> • It was confirmed that ESIA and EIA studies prepared under previous project phases require updating to reflect the current project design and applicable regulatory and financier requirements. • EPA confirmed that the previous EIA approvals expired in 2024 and 2025, and that a new EIA procedure must be initiated in accordance with national legislation. • The project falls under List I projects, for which a full EIA is mandatory; therefore, the screening phase is not applicable. • The need to conduct waste characterization prior to implementation was emphasized, in order to properly define the composition and classification of waste. • EPA representatives noted that, under Montenegrin legislation, permanent disposal/storage of hazardous waste is not permitted, and that the term “landfill” used in the ESIA documentation should be reconsidered and rephrased where relevant. 	

- MERS clarified that the project foresees temporary storage of existing hazardous waste as part of the remediation process and does not involve the establishment of a new permanent hazardous waste landfill.
- EPA presented the project “Development of remediation options for mercury-contaminated sites – former lead and zinc mine Brskovo, Mojkovac”, implemented by EPA in partnership with MERS, the Institute of Public Health of Montenegro and NGO Ozon.
- It was highlighted that this initiative contributes to alignment with the new EU Soil Monitoring and Resilience Law, relevant under Chapter 27 – Environment.
- EPA proposed that the updated ESIA for the KAP site should include a GAP analysis of the national legislative framework against the EU Soil Monitoring Law.
- EPA expressed readiness to support, within its mandate, efforts to facilitate and expedite the EIA approval procedure for the project.

Conclusions:

EPA to submit its written comments by 23 February.

MEETING MINUTES NO. 2

INSTITUTION	STAKEHOLDER ENGAGEMENT MoM	
MERS		
Date		
18.02.2026.		

REMEDIATION OF KAP SOLID WASTE AREA

ATTENDEES	
NAME	COMPANY / INSTITUTION
Lana Radunović	Ministry of Ecology, Sustainable Development and Development of the North (MERS)
Milena Lakić	Ministry of Ecology, Sustainable Development and Development of the North (MERS)
Almina Bučan	Project Implementation Unit (PIU) – WMRP
Milica Vujović	Project Implementation Unit (PIU) – WMRP
Danilo Barjaktarović	Consultant (ESIA Team)
Jelena Vukčević	Consultant (ESIA Team)
Maida Muratović	Consultant (ESIA Team)
Marko Ilić	Consultant (ESIA Team)
MEETING NOTES	
<p>Ms. Almina Bučan briefed the participants on the project background and scope, including the project lead institution and the parties involved in the preparation of the Environmental and Social Framework (ESF) documentation. The Waste Management Reform Project (WMRP) represents a continuation of the Industrial Waste Management and Cleanup Project (IWMCP), previously implemented in 2022. The current phase focuses on remediation activities at the solid waste disposal site within the KAP industrial area. The project is led by the Ministry of Ecology, Sustainable Development and Development of the North (MERS), implemented in coordination with the Environmental Protection Agency (EPA), and financed by the World Bank. Consulting services are being provided by the ENCON–E3 Consulting Consortium.</p> <ul style="list-style-type: none"> • MERS informed the participants that the remediation of the KAP solid waste disposal site is being implemented as a project of public interest, aimed at addressing historical environmental liabilities and reducing long-term environmental and health risks. It was noted that the relevant Government Information on the status of the red mud basins and hazardous waste landfill at the KAP site, including the proposal to establish public interest for project implementation, has been adopted. Responsibilities related to oversight during remediation, post-remediation site management and long-term environmental monitoring will be further specified through the ESIA/ESMP framework and the permitting conditions. • MERS stated that hazardous waste management in Montenegro is governed by national legislation and strategic planning documents with aim to align with EU directives from 27 Chapter. It was noted that the State Waste Management Plan of Montenegro has been adopted, although it has not yet been published in the Official Gazette. Within the scope of this project, the focus remains on managing existing hazardous waste at the KAP site through controlled remediation and long-term containment measures, rather than establishing new permanent disposal facilities for newly generated hazardous waste. • MERS highlighted the importance of aligning project implementation and subsequent site management with Montenegro’s EU accession commitments under Chapter 27 (Environment). Particular relevance was attributed to emerging EU requirements related to soil protection and monitoring, which should be reflected in the ESIA/ESMP approach, 	

especially in terms of baseline data collection, monitoring indicators and reporting arrangements.

- MERS emphasized the need to consider cumulative impacts with other ongoing and planned projects in the wider KAP area and surrounding industrial zone, including infrastructure and environmental remediation initiatives, in order to avoid overlapping pressures on access, traffic, environmental quality and institutional capacities.
- MERS stated that there is currently no reliable or up-to-date data on waste characterisation and quantities at the KAP site, and that the information available from previous studies is considered outdated and not sufficiently relevant for informed decision-making.

MEETING MINUTES NO. 3

INSTITUTION	STAKEHOLDER ENGAGEMENT MoM	
UNIPROM-KAP		
Date		
16.02.2026.		

REMEDIATION OF KAP SOLID WASTE AREA

ATTENDEES	
NAME	COMPANY / INSTITUTION
Nebojša Dožić	Uniprom-KAP
Marina Medojević	Uniprom-KAP
Mila Kostić	Uniprom-KAP
Milica Vujović	Project Implementation Unit (PIU) – WMRP
Almina Bučan	Project Implementation Unit (PIU) – WMRP
Danilo Barjaktarović	Consultant (ESIA team)
Jelena Vukčević	Consultant (ESIA team)
MEETING NOTES	
<p>The project scope, objectives and planned remediation activities at the KAP solid waste disposal site were presented to UNIPROM representatives, including the key elements of the ESIA process and planned stakeholder engagement.</p> <ul style="list-style-type: none"> UNIPROM proposed that the planned temporary storage cells for hazardous waste originating from the former KAP disposal area could also be used for the disposal of hazardous waste generated from UNIPROM's existing facilities. This primarily refers to asbestos-containing roofing materials (salonit) from buildings within the factory premises, as well as waste from decommissioned electrolysis cells (e.g. iron and aluminium residues). UNIPROM indicated that they would be willing to finance any additional costs associated with potential variations in the scope of waste to be managed under the project. UNIPROM stated that they expect certain impacts during the construction/remediation phase, primarily related to potential disturbances to factory workers and daily operations (e.g. increased traffic, noise, dust, and organisational/logistical constraints). In addition, UNIPROM highlighted the importance of considering cumulative impacts in the context of other ongoing and planned projects in the vicinity of their facilities, notably the construction of the Botun Wastewater Treatment Plant, as well as other infrastructure projects in the broader industrial zone. Land ownership and land management issues in the wider project area were briefly discussed. No specific unresolved ownership disputes were raised at this stage. The topic of potential current impacts from the existing solid waste disposal site was discussed at a general level. UNIPROM did not present detailed quantified impacts at this stage, but acknowledged that the presence of the disposal site represents an environmental and operational constraint for the wider industrial area. UNIPROM confirmed that they had been involved in earlier phases of this project and previous communication processes related to waste management and environmental issues in the KAP area. They emphasized that they expect to be more actively and systematically involved in the next phases of the project, given the proximity of their operational facilities and potential impacts on their workforce and operations. Strengthened and regular communication was highlighted as important for effective coordination. 	

Conclusions:

- UNIPROM will submit formal written comments and proposals on the ESIA package to the designated contact person within the Ministry of Ecology, Sustainable Development and Development of the North (MERS) for further consideration.
- Continued and strengthened stakeholder engagement with UNIPROM will be ensured throughout the subsequent phases of the project, in line with the Stakeholder Engagement Plan (SEP).
- Potential cumulative impacts with other nearby projects (including the Botun Wastewater Treatment Plant) will be further considered in the ESIA/ESMP framework and during implementation planning.

MEETING MINUTES NO. 4

INSTITUTION	STAKEHOLDER ENGAGEMENT MoM	
Municipality of Zeta		
Date		
18.02.2026.		

REMEDIATION OF KAP SOLID WASTE AREA

ATTENDEES	
NAME	COMPANY / INSTITUTION
Aleksandar Kujičić	Municipality of Zeta
Jelena Aligrudić	Municipality of Zeta
Almina Bučan	Project Implementation Unit (PIU) – WMRP
Milica Vujovic	Project Implementation Unit (PIU) - WMRP
Jelena Vukčević	Consultant (ESIA Team)
Danilo Barjaktarović	Consultant (ESIA Team)
Maida Muratović	Consultant (ESIA Team)
Marko Ilić	Consultant (ESIA Team)

MEETING NOTES
<p>An introductory presentation of the project was delivered to the representatives of the Municipality of Zeta, outlining the overall objectives of the Waste Management Reform Project (WMRP), the specific scope of remediation works planned at the KAP solid waste disposal site, and the rationale for the proposed remediation approach.</p> <ul style="list-style-type: none">• The Municipality of Zeta provided preliminary comments on the ESIA and noted that the Municipality is not sufficiently reflected in the description of the project area and location context. They emphasized that the project site is located within the territory of the Municipality of Zeta and on cadastral parcels belonging to cadastral municipalities of Zeta. The Municipality stated that they will submit formal written comments on the ESIA documentation.• It was noted that the Urban and Technical Conditions (UTU) were issued under the former Spatial and Urban Plan of Podgorica and the Detailed Urban Plan (DUP) from 2021. The Municipality emphasized the need to verify the validity of the existing UTU and, if required, to initiate procedures for their renewal/extension in line with current spatial planning documents and regulations.• The Municipality highlighted that the environmental baseline data used in previous analyses are outdated. It was noted that new environmental investigations will be conducted by CETI, including analyses of soil, air quality, surface and groundwater, and noise. These investigations should also include proper waste categorisation and determination of waste types to support further decision-making.• The Municipality of Zeta stated that, while they consider it positive that the existing waste will be properly managed and temporarily stored in a controlled manner, their position is that the waste should ultimately be fully removed from the territory of the Municipality of Zeta. The Municipality emphasized that the cumulative environmental and social pressure on this location is already high.• The ESIA consultants clarified that the export of hazardous waste represents a complex and challenging process, as many countries are increasingly restricting the import of waste, and specific permits and bilateral approvals are required. It was noted that the proposed remediation concept is based on long-term containment (encapsulation) of the waste on site, in line with applicable technical, regulatory and financial constraints.• The Municipality of Zeta highlighted that the current situation related to land ownership and the transfer of land titles between municipalities is affected by the ongoing process of administrative

and cadastral delimitation between Zeta and Podgorica. This situation creates uncertainties in terms of cadastral records, jurisdiction over specific parcels and the practical exercise of ownership and management rights. The Municipality stressed that the resolution of boundary delimitation and related cadastral and property registration issues represents an important prerequisite for ensuring legal certainty and smooth project implementation.

- The Municipality of Zeta stated that it expects to play an active role in the overall project implementation and in the subsequent management of the remediated site, particularly in relation to local coordination, monitoring of impacts on local communities, and interface with municipal services and infrastructure. The Municipality emphasized the importance of being formally involved in communication, coordination mechanisms and decision-making processes, given that the project is located on its territory and may have implications for local land use, environmental quality and community well-being. The need for clearly defined roles and responsibilities between the Municipality of Zeta, the Capital City of Podgorica, and national institutions was highlighted as a key condition for effective project governance.

Conclusions:

The Municipality of Zeta stated that the project area falls within its administrative territory. However, due to the still unresolved administrative boundary delimitation between the Municipality of Zeta and the Capital City of Podgorica, certain competences and administrative responsibilities in the wider project area remain unclear in practice. The Municipality emphasized the need for clearer institutional coordination and formal clarification of administrative roles between the two local self-government units, particularly with regard to permitting, land-use planning, access management and coordination of municipal services.

MEETING MINUTES NO. 5

INSTITUTION	STAKEHOLDER ENGAGEMENT MoM	
Capital City of Podgorica		
Date		
23.02.2026.		

REMEDIATION OF KAP SOLID WASTE AREA

ATTENDEES

NAME	COMPANY / INSTITUTION	POSITION
Vesna Brajović	Capital City Podgorica	
Branka Knežević	Capital City Podgorica	
Almina Bučan	Project Implementation Unit (PIU) –WMRP	
Milica Vujovic	Project Implementation Unit (PIU) – WMRP	
Jelena Vukčević	Consultant (ESIA Team)	
Marko Ilic	Consultant (ESIA Team)	
Danilo Barjaktarović	Consultant (ESIA Team)	

MEETING NOTES

An introductory presentation of the project was delivered to the representatives of Capital City of Podgorica, outlining the overall objectives of the Waste Management Reform Project (WMRP), the specific scope of remediation works planned at the KAP solid waste disposal site, and the rationale for the proposed remediation approach.

- It was noted at the outset that the City of Podgorica is not formally or legally designated as a direct implementing authority within the project framework. However, given the proximity of the project site, the interlinkages with municipal infrastructure and services, and the cumulative impacts of parallel projects in the area, the City of Podgorica expressed a high level of interest in the project and its outcomes, and emphasized the importance of being actively consulted and kept informed throughout the project lifecycle.
- It was noted that the launch of the tender procedure for the construction contractor is expected as of September. It was recalled that the Main Design was prepared in 2021 and that environmental approvals (EIA consents) were obtained for two project components under previous phases. However, these approvals have expired, and a new EIA procedure will need to be conducted in accordance with applicable national legislation.
- Representatives of the Capital City of Podgorica emphasized that Deponija Podgorica should be formally included in the consultation process as a relevant stakeholder, given its role and operational experience in waste management in the wider area.
- It was noted that environmental monitoring activities at the KAP site had been conducted in the past; however, a significant period of time has elapsed since those assessments. The need for new and updated baseline analyses (soil, groundwater, air quality, etc.) was emphasized, as confirmed by representatives of MERS.
- Representatives of the Capital City of Podgorica raised the question of whether alternative options to the proposed remediation concept exist, including the possibility of exporting the waste. They expressed concern regarding potential reactions of local residents, particularly given that construction works for the wastewater treatment system are currently ongoing in the area. The project location was described as highly sensitive, with cumulative pressures from multiple infrastructure activities taking place in parallel.

- It was discussed that there is a possibility to update the Main Design to reflect new or revised Urban and Technical Conditions (UTU), should updated UTU be issued. The need to ensure consistency between technical design documentation, the current spatial planning framework and permitting requirements was highlighted.
- The deadline for submitting comments on current ESIA package was set for 24 February.
- The City of Podgorica noted that the ESIA package should be further complemented, in particular the chapter on Analysis of Alternatives. It was agreed that the updated ESIA documentation will be re-circulated for further review.
- The City of Podgorica noted that, in their view, the timeline for launching the tender procedure appears relatively tight.

Conclusions:

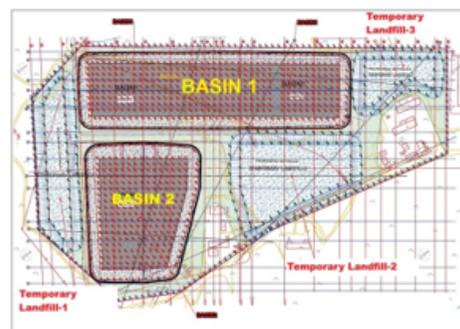
- The City of Podgorica will remain closely engaged in the consultation process, despite not being a formal implementing authority.
- The ESIA documentation will be updated, particularly the chapter on Analysis of Alternatives, and re-circulated for further comments.
- The deadline for submitting comments on current ESIA package was set for 24 February.
- Updated environmental baseline studies will be undertaken to support the EIA/ESIA process and technical design.
- Deponija Podgorica will be included as a stakeholder in the subsequent consultation rounds.
- The need to manage cumulative impacts and community sensitivities in the project area was acknowledged.

Appendix 2: Project leaflet used during socio-economic survey

The remediation of the Kombinat Aluminijuma Podgorica (KAP) solid waste dump site is implemented as a subproject under the Montenegro Waste Sector Improvement Project (MWSIP), which aims to strengthen the national waste management system and improve environmental performance. The KAP dumpsite, where uncontrolled disposal of hazardous and non-hazardous waste has taken place since 1969 without containment or pre-treatment measures, represents a significant source of soil, water, and air pollution. The project focuses on improving environmental conditions and reducing legacy pollution risks through targeted remediation activities.

The scope of the remediation works includes site preparation and clearance activities; construction and preparation of designated encapsulation basins with protective lining systems; controlled placement of existing solid waste in layers; final capping; and installation of surface water drainage systems. Project activities will be implemented in a phased manner to ensure environmental protection, operational safety, and effective risk management during both construction and operation. In accordance with the Main Design, the Project will involve the establishment of three temporary waste storage basins and two permanent encapsulation basins within the boundaries of the existing site, without requiring land acquisition, as all land is publicly owned. Temporary storage of material is required solely to enable the construction of the permanent basins. The two permanent basins will comprise a multilayer encapsulation system (16 layers) designed to fully isolate the solid waste from air and precipitation, prevent leachate generation and migration, and eliminate potential impacts on soil, surface water, groundwater, and other environmental and social receptors. Although located outside the Project boundary,

nearby residential areas, industrial facilities, and local businesses are identified as key stakeholders due to their proximity and will be engaged throughout all phases of the Project.



The Environmental and Social Impact Assessment (ESIA) Report has been prepared for the Project; Remediation Activities on KAP Solid Waste Dump Site in Podgorica following legal requirements of Montenegro as well as requirements of the World Bank Environmental and Social Framework. Activities related to remediation of the KAP Solid Waste Area represent a continuation of activities implemented in 2012, and subsequently continued in 2022, as part of the Industrial Waste Management and Cleanup Project (IWMCP), which was also financed by the World Bank. Main Design for remediation of the Solid Waste Disposal Site was developed in 2022, and it represents the basis for implementation of this project. The Project does not involve development of new industrial production facilities and is solely focused on environmental remediation and risk reduction limited to the waste disposal site, which has been out of use since 2012. During the operation (post-remediation) phase, activities will be limited to

site management, maintenance, and environmental monitoring.

The Project was subject to previous public consultation during the EIA procedure in accordance with national legislation. This public consultation meeting is being organized in order to inform public and all stakeholders including the population that would be potentially affected by the Project and to get comments and opinions on the Project and on the draft ESIA Report. All the comments received during the public consultation will be documented and addressed in the ESIA report including minutes with questions and answers from the public hearing.



CONTACT DETAILS:

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Project aims to reduce and eliminate some of the negative impacts of the solid waste disposal site on the environment by recultivation of the site. The Project provides elimination of the negative impacts of the disposal site on the quality of surface water resources, reduction of pollution in the ground water in the surrounding area and reduction of air pollution and soil pollution in the surrounding area.

Potential Area of Influence (Aoi)

The KAP is located between two rivers, the Morača River and the Cijevna River and located above Lake Skadar. Also, the Morača River passes near the KAP site and flows into Lake Skadar, a large National Park, which is located on the Albanian border. The potential Aoi would involve these surface water resources as well. In terms of the socioeconomic environment, the Aoi would include the close-by settlements mainly Botun village. In addition, the surrounding close settlements where generated dust and noise could reach are considered as sensitive receptors in terms of impacts on physical and social environment.

BENEFITS OF THE PROJECT:

- ✓ Reduction of historical environmental pollution affecting air, surface water, groundwater and soil, contributing to improved overall environmental quality.
- ✓ Improvement of air quality through remediation activities and better environmental management practices.
- ✓ Elimination of existing surface water contamination sources and protection of nearby water bodies.
- ✓ Restoration and rehabilitation of degraded land areas, supporting long-term ecological recovery and safer land use.

Dust emissions, exhaust emissions	<ul style="list-style-type: none"> • Frequent watering of work grounds will be done during dry period. • All vehicles, equipment and machinery used for construction will be regularly maintained and inspected/certificated to ensure that the exhaust emission levels conform to the standards prescribed.
Impacts on groundwater and surface water quality	<ul style="list-style-type: none"> • Driving of machinery within surface water, streams or on their banks will be prevented. • All machines and equipment will be checked for leaks prior to use.
Impact on soil quality and change in topography and natural drainage	<ul style="list-style-type: none"> • Systematic collection of solid waste during construction (including food and material packaging, and other types of waste) would be undertaken and wastes would be disposed at licensed facilities specified by national authorities • Parking, washing, maintenance and fuelling of the construction machinery would be done at designated sites with concrete ground and in the event that soil is contaminated by spillage, affected layer would be removed in line with the relevant regulation and internal management plans.
Impact on land- scape	<ul style="list-style-type: none"> • Preparation of a landscape restoration plan in line with the remediation design including the realistic requirements to minimize short term visual impacts from the site operations and to maximize the long-term recovery potential of the landscape.
Operation Phase	
Impacts on ground water and surface water quality	<ul style="list-style-type: none"> • Regular cleaning and maintenance of the water drainage system
Erosion risk, landslide, change in geological structure	<ul style="list-style-type: none"> • To avoid landslides on the slopes and embankments, technical requirements in line with the Main Design and Emergency Action Plan will be implemented
Loss of flora and fauna	<ul style="list-style-type: none"> • Checking and recording germination success of planted areas • If it is necessary, repeat sealing and planting by using of native species



Ministarstvo ekologije,
održivog razvoja
i razvoja sjevera

MINISTRY OF ECOLOGY, SUSTAINABLE DEVELOPMENT AND NORTHERN REGION DEVELOPMENT (MESDNRD)



REMEDIATION OF KAP WASTE DISPOSAL SITE PROJECT LEAFLET

PUBLIC CONSULTATION MEETING

**Amphitheatre of the Ministry (2nd floor)
February 19th, 2026,
at 10:00 a.m.**

9.1 Appendix 3: Meeting Minutes from PCM, including Attendance Sheet and Photos

Project Name	<i>Waste Management Reform Project (WMRP)</i>
Implementing Agency	<i>Ministry of Ecology, Sustainable Development and Northern Development</i>
Subject of Consultation:	Environmental and Social Framework (ESF) documentation package

Location:	Ministry of Ecology, Sustainable Development and Northern Development Eco-efficient Building, Cetinjski put bb, Podgorica Amphitheatre (Second Floor)
Date/Time:	19 th February 2026 / 10:00h

Opening of the Public Consultation

The public consultation meeting was opened by Ms Almina Bučan, Grant Coordinator, on behalf of the Project Implementation Unit (PIU), representing the Ministry of Ecology, Sustainable Development and Northern Development.

In her introductory remarks, it was stated that the Government of Montenegro secured grant financing in the amount of USD 1,000,000 from the International Bank for Reconstruction and Development (IBRD)-World Bank, under the Grant Facility for Project Preparation (GFPP), to support preparation and implementation of the Project.

It was further emphasised that the Government of Montenegro declared the Waste Management Reform Project a project of public interest, considering its strategic importance for strengthening the national waste management system, improving environmental protection, and aligning with European Union acquis and standards.

The Project comprises three components:

1. Strengthening governance and institutional capacity in the waste sector;
2. Investments in waste management infrastructure, including establishment of a Regional Waste Management Centre (WMC) in Nikšić;
3. Addressing environmental risks through remediation unmanaged solid waste disposal site located at the site of the former Aluminium Plant (KAP) in Podgorica.

The public consultation meeting was duly disclosed on the official website of the Ministry on 6 February 2026, including a link to the full ESF documentation package and an email address for submission of written comments, in line with ESF stakeholder engagement requirements.

Presentation of the ESF Documentation

The subject of the consultation was the ESF documentation package comprising:

- Environmental and Social Impact Assessment (ESIA) for the Remediation of the Solid Waste Disposal Site at the former Aluminium Plant (KAP) site in Podgorica;
- Labour Management Procedures (LMP);
- Stakeholder Engagement Plan (SEP);
- Environmental and Social Commitment Plan (ESCP).

Representatives of the consortium ENCON-E3 Consulting responsible for the preparation of ESF documentation (Mrs. Marija Sindjic and Mr. Marko Ilic) presented key points from the ESIA for the Remediation of the Solid Waste Disposal Site and overall Project framework. During the presentation, the overall Project framework, key components, and planned activities were introduced, with particular focus on the remediation of the former KAP site in Podgorica.

Participants were informed of:

- Baseline environmental and social conditions;
- Identified environmental and social risks and impacts;
- Proposed mitigation measures;
- Environmental and social monitoring arrangements;
- The Project-level Grievance Mechanism;
- Procedures for submission of comments during the disclosure period.

Following the presentation, the floor was opened for discussion.

Stakeholder Comments and Responses

No.	Name and Institution	Comment / Question	Response
1	Boris Jabučanin, EMCG d.o.o.	Expressed interest in participating in Project implementation through engagement of a company specialising in bio-waste treatment. Proposed that treated bio-waste be used as vegetative (living) cover material as part of site remediation works.	The Ministry representatives advised that the proposal should be submitted in writing for formal review. The proposal will be assessed in accordance with the Project design, ESF requirements, and applicable procurement and environmental regulations.
2	Draženka Lukovac, UNIPROM	Proposed inclusion of certain historical industrial materials (i.e. roof asbestos-cement sheets) located at the former KAP site into the remediation scope, following dismantling and obtaining necessary regulatory approvals. This waste is calculated as 1% of the total quantity of waste on existing solid waste landfill within KAP. This approach shall solve the problem of solid waste management within KAP in a long run. The company expressed readiness to bear additional costs proportionate to quantities involved.	The Ministry stated that a dedicated follow-up meeting will be organised with UNIPROM representatives to assess the proposal in accordance with applicable national legislation, environmental protection requirements, and Project objectives, ensuring alignment with public interest and ESF principles.
3	Vesna Vujačić, Municipality of Zeta	Emphasised the necessity of conducting detailed waste characterisation prior to implementation of remediation activities; defining adequate mitigation measures; and establishing independent environmental monitoring during and after Project implementation.	The Ministry clarified that waste characterisation, mitigation measures, and monitoring arrangements are defined within the ESIA. Updated sampling and laboratory analyses will be undertaken prior to commencement of works, as current data originate from 2021. Implementation will be based on updated baseline data and in accordance with applicable environmental standards and ESS requirements.
4	Nebojša Dožić, UNIPROM	Primary production at KAP was completed back in 2021. The project requires revision with the respect to construction of waste storage cells. In particular, temporary waste storage facilities should be established as an interim measure, followed by the construction of the permanent storage cells to ensure the final and safe disposal of waste.	The Ministry emphasised that this approach has already been defined under this project.
5	Milovan Benderać, Čistoća d.o.o., Municipality of Herceg Novi	Expressed interest regarding the planned establishment of the Regional Waste Management Centre in Nikšić and stated that the Municipality of Herceg Novi is interested in participation in the regional waste management system.	The Ministry stated that further planning of the Regional Waste Management Centre requires confirmation of projected waste quantities from participating municipalities. A working group will be established within the preparation of the Feasibility Study, including municipal representatives who will participate in the preparation process.

Conclusion of the Public Consultation

It was concluded that all participants were provided with the opportunity to present questions and comments regarding the disclosed ESF documentation.

Participants were informed that additional comments and suggestions may be submitted in writing via email within the prescribed disclosure period, and may also be submitted until the 23rd, as indicated in the public notice.

A total of 15 representatives of stakeholders and institutions attended the consultation meeting. The signed attendance list constitutes an integral part of these Minutes (Annex A).

The meeting concluded at 12:25.

Annexes

- Attendance List (Signed)
- Public Disclosure Notice
- ESF Documentation Presentation

Photo from the Public Consultation Meeting



9.2 Appendix 4: Public Grievance Leaflet

The MESDNRD/PIU is committed to ensuring that the establishment and implementation of the Waste Management Reform project does not cause adverse impacts on residents, landowners, business owners or other stakeholders affected by the Project. However, should any issues arise, we encourage you to share any concerns or grievances related to Project activities.

What type of grievance can be submitted?

Any individual may submit a grievance if they believe that Project activities are having a negative impact on them personally, their property or on their local environment. Examples include, but are not limited to:

- Increased noise, restricted access to private property, or other disturbances during construction works;
- Environmental, health, or safety concerns resulting from improper waste management, dust, or noise caused by the Project activities
- Damages on private property caused by the Project activities
- Inadequate implementation of the Stakeholder Engagement Plan by MESDNRD/PIU.

How can a grievance be submitted?

Grievances can be submitted to the MESDNRD/PIU (contact information provided below) or to the contractor/supervision engineer (once construction commences). Submission is free of charge to the complainant and may be made in the following ways:

- a. Verbally: in person or by telephone;
- b. In writing: either by completing the attached Project Grievance Form or using another preferred format, and submitting it by personal delivery, post, or e-mail.

CONTACT INFORMATION: Ministry of Ecology, Sustainable Development and Northern Region Development - Project Implementation Unit

Contact person: Almina Bučan

Position: Grievance Manager

Email: almina.bucan@mers.gov.me

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Address: Eko-efikasna zgrada, Cetinjski put b.b., 81000 Podgorica

Website: <https://www.gov.me/mers>

Grievances may also be submitted anonymously. If you prefer your grievance to remain confidential, the MESDNRD/PIU will ensure that your name and contact details are not shared without your consent. Only members of the MESDNRD / PIU team directly involved in addressing your grievance will have access to this information. In cases where a full investigation is not possible without disclosing your identity or the content of your grievance, you will be notified in advance.

How the MESDNRD/ PIU handles your grievance

Receipt and Registration of the Grievance

- All grievances received will be registered in a central grievance log maintained by the PIU. Where the identity of the complainant is known, an acknowledgment of receipt will be provided within three (3) working days.
-

Screening and Categorisation - The PIU will conduct an initial review to determine:

- whether the grievance is related to the Project;
- the grievance category (e.g. environmental issues, social issues, safety concerns, informational requests);
- the level of complexity and urgency.

- This step will be completed within five (5) working days of receipt.

Review and Resolution

- The PIU, in cooperation with relevant institutions, contractors, or competent authorities, will review the grievance and propose appropriate corrective or remedial measures.
- The standard timeframe for grievance resolution is fifteen (15) working days. For complex cases, this period may be extended up to thirty (30) working days, with prior notification to the complainant.

Response to the Complainant - a written response will be provided to the complainant, including:

- a summary of the grievance;
- actions taken or proposed;
- timelines for implementation of actions;
- information on escalation options if the complainant is not satisfied with the outcome.

Closure of the Grievance

- a grievance will be considered closed once corrective actions have been implemented or the complainant has accepted the response. The closure status will be recorded in the grievance log.

Appendix 5: Project Grievance Form

Reference Number	
Full name (optional) <ul style="list-style-type: none"> • I wish to raise my grievance anonymously. • I request that you do not disclose my identity without my consent. 	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ By Telephone: _____ By E-mail: _____
Preferred language of communication	<ul style="list-style-type: none"> • Montenegrin • English (if possible) • Other (e.g. Roma)
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	
	<ul style="list-style-type: none"> • One-time incident/grievance (date _____) • Happened more than once (how many times? _____) • On-going (currently experiencing problem)
What would you like to see happen?	

Appendix 6: Grievance Registry

No.	Name of complainant	Complainant profile	Contact information	Date received	Date acknowledged	Type (topic) of problem	Responsible party	Grievance description	Proposed corrective action	Due date for action	Results of action	Date of closure	Grievance follow-up	Recurring (Y/N)	Notes
	Enter name or 'anonymous'														

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

Appendix 4: Stakeholder Engagement Log

No.	Name/type of stakeholder (e.g., individual, local community, NGO, business, public institution, land or property owner, other (specify))	Contact information	Date of consultation	Type and place of consultation (e.g., live, online, telephone, group, personal, etc.)	Concern /topic description	Name, surname, and position of the MESDNRD/PIU representative	Name, surname, and position of the Municipality/Local Community representative (if applicable)	Proposed Action/ Response (Immediate / Long-term)	Start and end time of the consultation or meeting duration	Are further meetings planned, and if so, within what time frame?	Follow-up	Notes

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