MONTENEGRO

MINISTRY OF ENERGY and CEDIS

Montenegro Energy Sector Decarbonization Project (MESDP)

P505964

STAKEHOLDER ENGAGEMENT FRAMEWORK

(SEF)

DRAFT VERSION

September 2024.

Introduction

The Montenegro Energy Sector Decarbonization Project (MESDP), financed by the World Bank, aims to improve the energy efficiency of public buildings and enhance the operational efficiency of Montenegro's electricity distribution grid. To ensure transparent and inclusive participation of stakeholders across all project activities, this Stakeholder Engagement Framework (SEF) consolidates two Stakeholder Engagement Plans (SEPs) for the project's key components:

- Component 1: Improving Energy Efficiency of Public Buildings
- Component 2: Enhancing Operational Efficiency of the Electricity Distribution Grid

The SEF provides a unified approach to stakeholder identification, engagement, and consultation, ensuring that all relevant parties are informed and involved throughout the project's lifecycle. It also outlines the mechanisms for receiving and addressing grievances, ensuring that concerns are handled in a transparent and effective manner. This framework aligns with both national regulations and the World Bank's Environmental and Social Standards (ESS), particularly ESS10 on Stakeholder Engagement and Information Disclosure.

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MINISTRY OF ENERGY

Montenegro Energy Sector Decarbonization Project (MESDP)

for Component 1

P505964

STAKEHOLDER ENGAGEMENT PLAN COMPONENT 1 (SEP)

DRAFT VERSION

September 2024.

Abbreviations and Acronyms

EE	Energy Efficiency
ESCO	European Skills, Competences, and Occupations
ESCP	Environmental and Social Commitment Plan
ESF	Environmental and Social Framework
ESHG	Environmental, Health and safety Guidelines
ESMF	Environmental and Social Management Framework
ESS	Environmental and Social Standards
MoE	Ministry of Energy
M&V	Measurement & Verification
NZEBs	Near-Zero Energy Buildings
PV	Photovoltaic
SEP	Stakeholder Engagement Plan
WB	World Bank

1.1. Introduction/Project Description

The objective of the Montenegro Energy Sector Decarbonization Project (MESDP) is to improve energy efficiency of public buildings and enhance operational efficiency of the electricity distribution grid in Montenegro.
The Project consist of three (3) Components as shown in the Table 1.

Table 1. Project components

Component 1 Improving Energy Efficiency of Public Buildings	
Activities	Carry out energy efficiency renovations in National University buildings and selected Public buildings by implementing a range of EE Measures
	Operationalize the budget capture scheme for EE renovations established under MEEP2
Component 2 Enhancing Operational Efficiency of the Electricity Distribution Grid	
Activities	Replace power distribution transformers
	Retrofit the switchgear on the 35 kV side of a 110/35 kV substation
	Install/replace 100,000 smarts meters and finance grid digitalization investments
	Upgrade distribution grid code and enhance integrated system planning
Component 3 Technical Assistance and Project Implementation Support	

This SEP covers Component (1) - Improving Energy Efficiency of Public Buildings that is described hereinafter.
This component will finance Energy Efficiency (EE) renovations of select buildings of the University of Montenegro (Univerzitet Crne Gore, UCG) across the Country and of other public buildings located in Podgorica. A total of 23 buildings, have been identified as priority sites for renovation under the project. These buildings include 16 UCG buildings and 7 additional public buildings.
The UCG is the only public university in Montenegro and the largest university in the country, with about 22,000 students and facilities located in Podgorica and several other cities. Many of UCG's buildings are in need of renovation due to their age, poorly insulated walls and windows, and inefficient heating and cooling systems. The government of Montenegro decided to prioritize the renovation of UCG buildings under MESDP in light of their significant potential for EE improvements, their high level of utilization by a broad community of student, faculty, and staff, and the positive ripple effect of the renovation on the environmental awareness of the younger generations.
At the same time, the government of Montenegro identified additional public buildings that also need renovation and EE improvements. These additional public buildings are all located in Podgorica and include buildings used by different ministries and public agencies, as well as a health center.
The renovation of the selected buildings will include a wide range of EE measures, tailored to the specific conditions and characteristics of each building. The EE investments supported under the project will include the replacement of windows, insulation of walls and roofs (using climate-resilient envelopes), the upgrade of efficient heating and cooling systems, the installation of Rooftop Solar Photovoltaic (RSPV) systems, lighting upgrades, and a limited amount of reconstruction work. Based on the experience of other recent EE projects in Montenegro (including MEEP2), EE retrofitting is expected to reduce the energy consumption of the selected buildings by at least 20-30 percent. Where needed, the project will also finance interventions to reinforce structural elements of the buildings to withstand climate-related hazards (e.g., extreme heat events, floods) and earthquakes, but up to a maximum of 10 percent of the total investment.

Table 2. Buildings of the University of Montenegro selected for renovation

	Name of the building/institution	Location
1	Maritime Faculty Kotor-Maritime Library	Kotor
2	Faculty of Common Arts	Cetinje

3	Faculty of Fine Arts	Cetinje
4	Faculty of Philosophy and Philology	Niksic
5	Faculty of Sport and Physical Education of UCG	Niksic
6	UCG - Basic teaching building and laboratory of technical faculties and PMF	Podgorica
7	Rectorate building	Podgorica
8	Biotechnical faculty	Podgorica
9	Faculty of Law and Faculty of Political Sciences	Podgorica
10	Faculty of Architecture in Podgorica	Podgorica
11	UCG - Faculty of Economics	Podgorica
12	UCG - Faculty of Medicine	Podgorica
13	Historical Institute of UCG	Podgorica
14	Building of the Faculty of Civil Engineering	Podgorica
15	Faculty of Biotechnology-Applied studies Mediterranean fruit growing	Bar
16	Faculty of Biotechnology-Applied studies Continental fruit growing and medicinal plants	Bijelo Polje

Table 3. Public buildings selected for renovation

	Name of the building/institution	Location
1	Institute of Ecotoxicology	Podgorica
2	Commercial Court and Statistic office	Podgorica
3	Tax administration	Podgorica
4	Institute of Geological Research, and Hydrocarbons Administration	Podgorica
5	Health Center Podgorica-Tuzi	Tuzi
6	Supreme State Prosecutor's Office of Montenegro	Podgorica
7	Ministry of Justice	Podgorica

The MESDP Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

1.2. Legal and institutional framework

Law on Free Access to Information

The Law on Free Access to Information (Official Gazette 044/12 and 030/17) aims to enhance transparency and guarantee public access to information held by public authorities. It grants every natural or legal person the right to access information possessed by state bodies, local governments, public companies, and other entities that carry out public functions. This right covers information in all forms, whether it be written, electronic, or other formats. Public authorities are mandated to respond to information requests within 15 working days, either by providing the requested information or by justifying any refusal based on specific legal grounds. The law also establishes an appeal process for instances where access to information is denied. These appeals can be lodged with the Agency for the Protection of Personal Data and Free Access to Information, which is tasked with overseeing the law's implementation and ensuring adherence. While the law is designed to promote transparency, it also specifies certain exceptions where access to information may be restricted. Such

restrictions are applicable in cases where disclosure could potentially harm national security, public safety, defense, or international relations. However, if it is determined that the public interest in disclosure outweighs the potential harm, the information must still be released. The law also includes provisions for imposing fines on public bodies that fail to meet their obligations related to information access, thereby ensuring accountability. It encourages public authorities to proactively disclose information about their activities, such as decisions, policies, and financial reports, to minimize the need for individual requests. Moreover, the law addresses the protection of personal data, ensuring that the right to access information does not infringe on individual privacy rights.

Aarhus Convention

Montenegro is party to the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters done at Aarhus, Denmark, on 25 June 1998, which is based on three pillars:

- **The right to information**: citizens have the right to access environmental information held by public authorities upon request;
- **The right to participate** in decision-making during the preparation of plans, programs, policies and legislation relating to the environment; and
- **The right to justice**: citizens have the right to access justice regarding environmental matters; to challenge a refusal or inadequate response to request for information; and to challenge the legality of a plan or challenge actions or omissions that contravene national environmental law.

Any member of the public has the right to submit communications to the Aarhus Convention Compliance Committee concerning alleged non-compliance of a party with the Convention.

1.3. Social risks and impacts

Most social risks identified for Component 1 are typical for construction (renovation) works. The civil works to be performed are small to medium in magnitude and as such the impacts can be easily and predictably avoided, minimized and mitigated by proper organization of construction site, continuous communication with all stakeholders and through other ESF tools and national legislation, in particular through the development and implementation of project stakeholder engagement plans and grievance redress mechanisms as well as through the development and implementation of labor management procedures.

Community health and safety

Community health and safety risks typical for construction / renovation works:

- Increased noise and vibrations caused by increased traffic, use of machinery and equipment at the construction/renovation site.
- Traffic accidents for pedestrians caused by increased and inadequately organized traffic (transportation of materials, equipment and workers);
- Temporary closing of roads without ensuring adequate transport routs may cause inconvenience for local population.
- Disruptions in utility services due to accidents or planned interventions (water, gas, electricity).
- Poor occupational health and safety practices
- Inadequate disposal of waste from construction site polluting the community environment (including inadequate management of asbestos waste and exposure of local community with asbestos – if proved to be presence of asbestos on any of the sites).

In addition, potential community risks related to foreign labor influx are present. Although contractors and workers employed in construction activities are likely to be locally based, there is a potential of labor influx and contractor may engage foreign workers (local from outside the sub-project area or foreigners). Potential risks and impact on community related to foreign workers due to difficulty of

their integration into community are present (e.g., the feelings of anxiety and fear for unsafe environment among the local residents when there are foreign workers living in the same building or in vicinity).

Labor management risks

This Project will most likely include all categories of project workers defined by ESS2, except community workers (direct workers, contracted workers, and primary supply workers). Beside direct workers (persons employed or engaged directly by the implementing agencies such as technical, and environmental experts, architects, civil engineer, procurement, financial management employed within the PIU, etc.) both low and high-quality skilled workers, are expected to be engaged by contractors and sub-contractors (i.e. construction company, supervision company, and company performing project management). Beside the OHS risks potential labor risks in relation to civil works are related to working conditions and treatment of the project workers during implementation of works (e.g., employment and working conditions, membership and participation in workers' or employers' associations or in any other professional organization, etc.). It can be expected that the greater number of low skill workers will be engaged, including the foreign workers as previously described. Foreign workers can be seen as a vulnerable group due to their non-existent social networks, obstacles in exercising all social rights, and higher general exposure to potential discrimination.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

With respect to GBV, the risk is low as there will only be small to medium size civil works.

Montenegro has had a national law in place prohibiting workplace harassment, including sexual harassment, since 2012. Additionally, the country ratified the Istanbul Convention in 2013.

With respect to GBV, the risk is low as there will only be small to medium size civil works. The project is expected to engage some contractors and workers and will not include type of works which would initiate large labor influx. The project works will take place in areas which can be supervised. In spite of low GBV risk the project will institute a Code of Conduct for project workers and a dedicated grievance mechanism to receive confidential SEA/SH complaints. The project workers including those engaged on the small construction/installation works n will receive training on the prevention of SEA/SH.

Lack of communication and information exchange

There are potential risks of poor or a lack of communication and information exchange among relevant stakeholders including local community. For all civil works continuous stakeholder engagement through all project cycle should be ensured as well as easily accessible GRM mechanisms, both for public and project workers. Meaningful consultation and stakeholder engagement shall be conducted during the whole life-cycle of the of the subprojects.

1.4. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The key objectives of the SEP can be summarized as follows:

- Build ownership over the project outcomes among key stakeholders to promote collaboration, enhance probability of successful outcomes through ensuring key stakeholder participation.
- Start early in the project planning process in order for the initial feedback to be gathered from the participants and to enable modifications in the project design, as needed.
- Avoid, minimize, or reduce social risks that can negatively affect and/or jeopardize implementation of project activities, through proactively identifying risks and concerns with stakeholders and preventing or mitigating these risks through transparent and agile communication channels.
- Provide guidance for stakeholder engagement.
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities.
- Identify the most effective methods, timing, and structures through which to share project information, and to ensure regular, accessible, transparent, and appropriate consultation.
- Develop a stakeholder's engagement process that provides stakeholders with an opportunity to influence project planning, design, and implementation by generating structured channels for ongoing feedback from all project beneficiaries and partners.
- Establish formal grievance/resolution mechanisms.
- Define roles and responsibilities for the implementation of the SEP.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

1.5. Stakeholder identification and analysis

Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

Affected parties and other interested parties

Affected parties are persons, groups and other entities within the project area of influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Specifically, the following individuals and groups fall within this category:

Renovations of buildings of the University of Montenegro (UCG)

- Management staff of selected UCG buildings
- Staff of selected UCG buildings (including administrative staff, facility managers and maintenance staff, professors and researchers)
- Students using selected UCG buildings
- Associations representing staff of selected UCG buildings
- Associations of students (i.e. Student Parliament of the University of Montenegro and others)
- Inhabitants of neighboring buildings who may be impacted by the construction works (e.g., dust, noise, traffic disturbances).

Renovations of other public buildings located in Podgorica

- Management staff of public institutions including their line ministries (i.e. Ministry of Ecology, Sustainable development and Northern Region Development, Ministry of Justice, Ministry of Economic Development, Ministry of Health, Ministry of Mining, Oil and Gas
- Staff of public institutions
- Users of public services (i.e. patients and their caretakers in case of Health center Podgorica-Tuzi, citizens using court services, etc.)
- Associations representing staff of public institutions (Montenegro Medical Chamber, Montenegro Bar Association, Montenegro Chamber of Notaries, Montenegro Association of Judges, Montenegro Chamber of Nurses and Midwives)
- Associations representing users of public services impacted by the project (CSOs representing vulnerable groups, CSOs representing patients, CSOs representing plaintiffs and defendants)
- Inhabitants of neighboring buildings who may be impacted by the construction works (e.g., dust, noise, traffic disturbances).

The projects' stakeholders are also **other interested parties** that are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Specifically, the following individuals and groups fall within this category:

- Local authorities such as representatives of municipalities (i.e. mayors of towns and cities of selected locations)
- national and local media channels
- Civil society organizations, NGOs,

The following internal stakeholders can also be included in the category of "other interested parties":

- World Bank
- Ministry of Finance
- Implementing Agencies: Ministry of Energy (MoE, CEDIS)
- Component-specific Project Implementation Units (PIUs)
- Environmental Protection Fund of Montenegro (Eco Fund)
- Parties involved in construction activities (Contractors, OHS specialist, Supervision engineer, Designer)

Disadvantaged/vulnerable individuals or groups[i]

Within the Project, vulnerable or disadvantaged groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal

representation in the consultation and decision-making process associated with the project. Disadvantaged/vulnerable individuals or groups may include but are not limited to the following:

- Persons with disabilities (students and users of public services)
- Women (students and users of public services)
- Older persons (users of public services especially patients of health center Tuzi)
- Foreign workers
- Victim and witnesses (using Court services and premises of the Supreme State Prosecutor's Office of Montenegro)
- LGBT+Q students and teaching staff, Roma students and staff and economically marginalized people

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

The following table shows the likely impact that project activities will have on the vulnerable groups while the topics and frequency of engagement is described in following paragraphs.

Group	Impacts
- Persons with disabilities	- Potential impacts on accesiblity of the building during energy renovation works (reduced access to the elevator, changes in organization of spaces) - Efforts will be made during design and construction phase to avoid reorganization of spaces (minimal changes to layout) and limit the impact of construction work on work accessibility of the building. Contractors will be encouraged to use notices, signage and information materials in accessible formats (i.e. braille, large print, audio od digital format that can be read by digital readers) ans well as specific physical barriers and markings (i.e. tactile pads, raised strips for altered routes and layouts) and / or temporary structures (i.e. ramps) that comply with accessibility standards. - After renovation the improved energy efficiency in the buidlings will increase the quality of spaces and of service delivery
- Women	- Potential impacts on the quality and efficiency of public services delivery during energy renovation works. - After renovation the improved energy efficiency in the buidlings will increase the quality of spaces and of service delivery - Opportunity to influence the design and potentially benefit from internships (UCG students) -
- Elderly, persons users of public services especially	- Potential impacts on accesiblity of the building during energy renovation works (reduced access to spaces, changes in organization of spaces) - Efforts will be made during design and construction phase to avoid reorganization of spaces (minimal changes to layout) and limit the impact of construction work on work accessibility of the building. Contractors will be encouraged to use notices, signage and information materials in

patients of healthy center Tuzi	accessible formats (i.e. braille, large print, audio od digital format that can be read by digital readers) ans well as specific physical barriers and markings (i.e. tactile pads, raised strips for altered routes and layouts) and / or temporary structures (i.e. ramps) that comply with accessibility standards. - After renovation the improved energy efficiency in the buidlings will increase the quality of spaces and of service delivery
- Foreign workers	- Exposed to potential discrimination due to their non-existent social networks and obstacles in exercising all social rights, -
- Victim and witnesses	- Potential impacts on safety of the building during energy renovation works due reduced access to dedicated rooms for victims and witnesses, difficulties in securing separate flows (direction of moving within the buidling organised to avoid contacts between vicitms and witnesses with potential suspects - Efforts will be made during design and construction phase to assure a room for victims and witnesses and to organise, as much as possible, separate flows through space management of the building and management of the time in which victims, witnesses and eventual suspect are present in the building
- LGBT+Q students and teaching staff, Roma students and staff and economically marginalized people -	- Construction workers or contractors may not be trained on sensitivity and inclusivity towards LGBT+Q individual or members of ethnic minorities - Eventual temporary closures or relocation of classrooms, offices, or services during renovation may force economically marginalized individuals to spend additional time and money commuting to alternative sites, increasing financial and time burdens.

1.6. Stakeholder Engagement Program

Summary of needs and methods, tools, and techniques for stakeholder engagement

The stakeholder groups and their levels of influence, cross-referenced with their interests in the project, guides the type and frequency of engagement activities for each group. The color-coded interest and influence matrix provided below helps identify where to focus stakeholder engagement efforts as it outlines key stakeholder groups and categories, their needs and interests as well as influence in the project.

The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project and is based on the color code in the matrix below.

Table: Influence and interest matrix

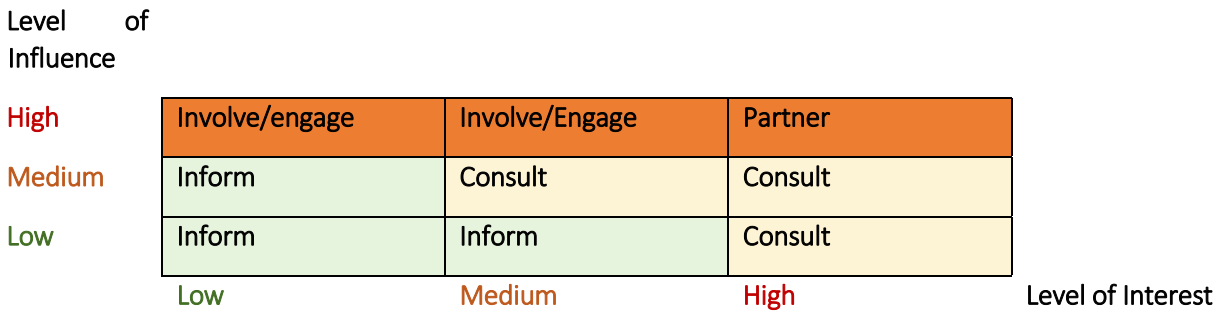

Table 4: Influence and Interest Matrix

Stakeholder Group	**Nature of interest**	**Level of interest**	**Level of Influence**	**Level of engagement**
Management Staff of Selected UCG Buildings	Minimize disruptions, ensure safety, improved work environment.	High	High	Partner
Staff of selected UCG buildings, staff of other public institutions and their associations	Minimize disruptions to work, ensure safety, improved work environment, advocate for staff rights, ensure fair working conditions.	High	Medium	Consult
Students using Selected UCG Buildings and their association	Access to study areas, minimal disruption, safety, potential internship opportunities.	High	Medium	Consult
Users of public services and their association	Access to services, safety, minimal disruption, advocate for vulnerable groups	High	Low	Inform
Inhabitants of Neighboring Buildings (UCG and Public Buildings)	Minimize noise, dust, and traffic disruptions.	High	Low	Consult
Local Authorities (Municipalities)	Minimize noise, dust, and traffic disruptions for citizens, improved delivery of public services	High	Low	Inform
National and Local Media Channels	Information dissemination, public interest.	Medium	Medium	Inform
The World Bank	Financier, Loan supervision	High	High	Partner
Ministry of Finance	Loan supervision	High	High	Partner

Implementing agencies (MoE, CEDIS)	Implementing agency	High	High	Partner
PIU of Implementing Agencies	Project success, timely completion, adherence to budgets.	High	High	Partner
Contractors, OHS Specialist, Supervision Engineer, Designer	Successful completion of works, adherence to safety and quality standards.	High	High	Partner
Vulnerable groups	Access to services, safety, minimal disruption	High	Medium	Consult

Proposed Strategy for Consultation

Different engagement methods are proposed and cover different stakeholder needs, interests and influence to the project as suggested in the stakeholder engagement plan below. Examples may include formal meetings, workshops, surveys but also phone and e-mail communication as well as formal press releases.

The outreach and stakeholder engagement will be gender appropriate, taking into consideration the after-hour chores of women. Targeted messaging will encourage the participation of women and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, medical facilities and services and other challenges they face at home, at workplaces and in their communities.

Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

Citizen/PAP perception survey and feedback: Six months after each launch meeting the PIU will conduct sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (PIU, Contractor, GM etc) during construction works. The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. This will allow the PIU to identify potential design issues. The survey data will be disaggregated by age, gender and location). Survey results with proposed corrective measures will be published on CEDIS website and discussed at consultation meetings.

Stakeholder engagement plan

Design phase

STAKEHOLDER ENGAGEMENT PLAN
Design phase Timeframe: *2025-2027*
Objective: Consult & inform key stakeholders to provide meaningful & constructive feedback Gather information relevant to adequately inform sub-project design (identification of needs, potential risks and impacts, suggestions for improvement)
Activities of pre-construction phase/design preparation phase: Identification and mobilization of key stakeholders Conducting stakeholder engagement (meetings, presentations etc.) Raising awareness and ensuring functioning of project GRM
Inputs for pre-construction phase/design preparation phase: Program of outreach for the location Communication tools: Summary on actions per location, PPTs design Articulation of key stakeholders, benefits & risks of sub-project implementation Project GRM
Outputs of the Pre-construction phase/design preparation phase: Summary of feedback received during stakeholder engagement Identification of critical risks and benefits for the locations based on stakeholder feedback Identification of Recommendations/Revisions to incorporate into design when feasible Informed Stakeholder Groups to Provide Meaningful Feedback during Construction phase Revised communication tools based on feedback received during pre-construction phase

Stakeholder engagement program for Design phase

Stakeholders	Benefits	Risks	Key messages and topics	Areas where Feedback is Sought	Methods for Engagement	Frequency and responsability
Management staff of selected UCG buildings, Management staff of other public institutions	- Manage a higher quality/modern facility - Satisfied staff due to the enhanced working environment - Improvement in of working environment reflects in better service delivery	- Resistance from employees due to potential impact of works on their working conditions (noise, dust, interruptions in heating, possible re-location, etc) - Additional workload as a focal point for communication of activites with the staff, students and/or other users of public services, PIU and Implementing Agency	- Efforts will be made during design and construction phase to limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	- Collect needs and feedbacks related to the buildings - Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - E-mail - Phone	- Frequency: monthly - Responsability: - Designer under the supervision of PIU
Staff of selected UCG buildings, staff of other	- Enhanced working environment that leads to	- Dissatisfaction with the final design	- Efforts will be made during design and construction phase to limit the impact of	- Collect needs and feedbacks related to the buildings	- Meetings - Presentation materials - E-mail	- Frequency: monthyl - Responsability:

public institutions	better service delivery and more satisfied users - Opportunity to influence the design	- Fear of negative impacts of construction on working and studying environment	construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	- Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Phone	- Designer under the supervision of PIU
Students of selected UCG buildings and their associations;	- Better service delivery Opportunity to influence the design and potentially benefit from internships	- Dissatisfaction with the final design - Fear of negative impacts of construction on working and studying environment (access to study areas)	- Efforts will be made during design and construction phase to limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - Internships (for UCG technical faculties)	- Frequency: at least once during phase - Responsibility: Designer under the supervision of PIU

Women	- Better service delivery Opportunity to influence the design and potentially benefit from internships	- Dissatisfaction with the final design - Fear of negative impacts of construction on working / studying environment and service delivery	- Efforts will be made during design and construction phase to limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - Internships (for UCG technical faculties)	- Frequency: at least once during phase - Responsibility: Designer under the supervision of PIU
Persons with disabilities	- Enhanced environment of UCG and public buildings with better service deliveries	- Potential impacts of construction works that might worsen the accessibility of the building to persons with disabilities (i.e. reduced access to the elevator, changes in organization of spaces)	- Efforts will be made during design and construction phase to avoid relocation and limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Web site (MoJPA, Court) - Information notices on construction sites - bulletin boards of judicial buildings	- Frequency: at least once during phase - Responsibility: Designer under the supervision of PIU

			- Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
Contractors	- gaining experience on works on renovation of public buildings managed in line with WBs procedures, especially ESF requirements	- low engagement or resistance to gain experience on works on renovation of public buildings managed in line with ESF requirements	- Present relevant legislation and ESF tools this includes obligation to athere to ESMP, establish GRM (including workers GRM) that are enabled to recognize SEA/SH grievances, establish the code of conduct for workers -	- Collecting feedback from project design and ESF requirements	- Regular Meetings - Mail - Phone -	- Frequency: once during phase - Responsibility: - Designer under the supervision of PIU
Victim and witnesses	- Enhanced environment of public buildings with better service deliveries	- Potential impacts on safety of the building during energy renovation works due reduced access to dedicated rooms for victims and	- Efforts will be made during design and construction phase to assure a room for victims and witnesses and to organise, as much as possible, separate flows through space management of the building and	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project - Grievances and level of satisfaction regarding grievance resolution	- Meetings - Web site - Information notices on construction sites - bulletin boards of judicial buildings	- Frequency: at least once during phase - Responsibility: - Designer under the supervision of PIU

		witnesses, difficulties in securing separate flows (direction of moving within the building organised to avoid contacts between vicitms and witnesses with potential suspects -	management of the time in which victims, witnesses and eventual suspect are present in the building - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
- LGBT+Q students and teaching staff, Roma students and staff and economically marginalized people	- Enhanced environment of public buildings with better service deliveries	- Construction workers or contractors may not trained on sensitivity and inclusivity towards LGBT+Q individual or members of ethnic minorities - Eventual temporary closures or relocation of classrooms,	- Efforts will be made during design and construction phase to avoid relocation of classrooms, offices or services that might generate additional cost or result in more time spent for commuting - Presentation of project, timeframes, WBs ESF and related tools obligations for contractor to	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project - Grievances and level of satisfaction regarding grievance resolution	- Meetings - Web site - Information notices on construction sites - bulletin boards of judicial buildings	- Frequency: at least once during phase - Responsibility: - Designer under the supervision of PIU

		offices, or services during renovation may lead to additional time and money for communitng to alternative sites, increasing financial and time burdens.	develop and implement Code of conduct and increase awareness of workers against SEA/SH - Presentation of GRM			

Construction / renovation phase

STAKEHOLDER ENGAGEMENT PLAN
Construction / renovation phase Timeframe: *2025/2030*
Objective: Consult & inform key stakeholders to provide meaningful & constructive feedback on project implementation Activate coordination mechanisms to assure functioning of project GRM
Activities of construction phase: Mobilize/implement construction phase communications activities Collect, systematize and prepare responses on feedback received Supervise adequate implementation and support for each location and GRMs
Inputs for construction phase: Communication tools: PPTs, leaflets, information notices on construction sites, bulletin boards Construction workers GRM tools Summary of Feedback received during construction phase

Outputs
Stakeholders informed and engaged in sub-project implementation
Updating/revision of the rehabilitation/construction works course due to possible problems or modifications of plans
GRM tools for construction workers is functional
Monthly reports from construction companies inform semi-annual project reports

Stakeholder engagement program for construction / renovation phase

Stakeholders	**Benefits**	**Risks**	**Key messages and topics**	**Areas where Feedback is sought**	**Methods for Engagement**	**Frequency and responsibility**
Management staff of selected UCG buildings, Management staff of other public institutions	- Manage a higher quality/modern facility - Satisfied staff due to the enhanced working environment - Improvement in of working environment reflects in better service delivery	- Resistance from employees due to potential impact of works on their working conditions (noise, dust, interruptions in heating, possible re-location, etc.) - Concerns regarding safety - Additional workload as a focal point for communication of activities with the staff, students and/or other users	- Efforts will be made during design and construction phase to limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Works managed with maximum attention to safety	- Collect needs and feedbacks related to the buildings - Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - E-mail - Phone	- Frequency: monthly - Responsibility PIU

		of public services, PIU and Implementing Agency	- Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
Staff of selected UCG buildings, staff of other public institutions	- Enhanced working environment that leads to better service delivery and more satisfied users	- Dissatisfaction due to the potential impacts that may be caused by construction works (excessive noise, reduced access to the elevator, interruptions in the supply of water, electricity, noise, etc.) - Concerns regarding safety - Dissatisfaction of users due to construction	- Efforts will be made during design and construction phase to avoid relocation and limit the impact of construction work on work environment (dust, noise etc.) - Improved service delivery and efficiency - Works managed with maximum attention to safety	- Collect needs and feedbacks related to the buildings - Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - E-mail - Phone	- Frequency: at least twice during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

		works disturbances is transferred to staff	- Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
Students of selected UCG buildings and their associations;	- Better service delivery	- Dissatisfaction due to the potential impacts caused by construction works (excessive noise, reduced access to the elevator, interruptions in the supply of water, electricity, noise, etc.)	- Efforts will be made to limit the impact of construction work (dust, noise etc.) - Location level GRM established to submit complaints, feedback, queries, suggestions Measures undertaken to toward grievance resolution and complaint feedback	- Collect needs and feedbacks related to the buildings - Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - Internships (for UCG technical faculties)	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU
Users of public services (other	- Better service delivery	- Dissatisfaction due to the potential impacts caused by	- Efforts will be made to limit the impact of	- Collect needs and feedbacks	- Meetings - Presentation materials	- Frequency: once during phase

than UCG students)		construction works (excessive noise, reduced access to the elevator, interruptions in the supply of water, electricity, noise, etc.)	construction work (dust, noise etc.) - Location level GRM established to submit complaints, feedback, queries, suggestions Measures undertaken to toward grievance resolution and complaint feedback	related to the buildings - Technical documentation / design - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution		- Responsibility Contractor and Supervising engineer under supervision of PIU
Associations representing staff of selected UCG buildings; Associations representing staff of public institutions; Associations representing users of public services impacted by the project	- Better service delivery	- Dissatisfaction due to the potential impacts caused by construction works (excessive noise, reduced access to the elevator, interruptions in the supply of water, electricity, noise, etc.)	- Efforts will be made to limit the impact of construction work (dust, noise etc.) - Location level GRM established to submit complaints, feedback, queries, suggestions	- Collect needs and - Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

		- Concerns regarding safety - Concerns regarding fair working condition	Measures undertaken to toward grievance resolution and complaint feedback - Works managed with maximum attention to safety and attention to ESF			
Neighboring buildings inhabitants	- Enhanced of attractiveness of the neighborhood due to building refurbishment / reconstructions	- Concerns as potentially affected by construction work (traffic disturbances linked to the reconstruction works and other negative impacts i.e. dust, noise)	- Efforts will be made to limit the impact of construction work (dust, noise etc.) - Location level GRM established to submit complaints, feedback, queries, suggestions Measures undertaken to toward grievance resolution and	- Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

			complaint feedback			
Local authorities	- Better service delivery - Enhanced attractiveness potentially contributing to positive economic and/or demographic trends	- Complaints from nearby community due the construction works impacts and interruptions (e.g. increased traffic, noise, dust, etc.)	- Sub-project level GRM established to submit complaints, feedback, queries, suggestions or compliments during design and construction phase - Measures undertaken to toward grievance resolution and complaint feedback	- Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - Frequency: If needed - Responsible: - PIU	- Frequency: once during phase Responsibility: - PIU
Local and national media	- To inform general public about project activities	- Correct and clear information on project activities not available	- To provide correct and clear information on project activities if requested	- Quality of material and Information provided	- Presentation materials - Press releases	- Frequency: once during phase - Responsibility PIU and MoE press services
Contractors, OHS specialist,	- gaining experience on	- low engagement or resistance from	- Present and control alignment	- Collecting feedback from	- Regular Meetings	- Frequency: monthly

Supervision engineer, Designer, Design auditor	works on renovation of public buildings managed in line with WBs procedures, especially ESF requirements	the staff of public bodies and UCG as well as students due to potential impact of construction work on their working conditions / studying conditions	with relevant legislation and ESF - Rising awareness and control functioning of project GRM and worker GRM - Time plans -	project and worker GRM	- Mail - Phone	- Responsibility - PIU
Persons with disabilities	- Enhanced environment of UCG and public buildings with better service deliveries	- Dissatisfaction due to the potential impacts that may be caused by construction phase to avoid works that might worsen service delivery and the accessibility of the building to persons with disabilities (i.e. reduced access to the elevator, changes in organization of spaces)	- Efforts will be made during design and construction reorganization of spaces (minimal changes to layout) and limit the impact of construction work on work accessibility of the building. - Improved service delivery and efficiency - Presentation - of GRM	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings, including with constructor to raise awareness on the needs of vulnerable group - Use of notices, signage and information materials in accessible formats (i.e. braille, large print, audio od digital format that can be	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

					read by digital readers) - Use of physical barriers and markings (i.e. tactile pads, raised strips for altered routes and layouts) - Use of temporary structures (i.e. ramps) that comply with accessibility standards.	
Women	- Better service delivery Opportunity to influence the design and potentially benefit from internships (UCG students)	- Dissatisfaction due to the potential impacts that may be caused by construction works (i.e. reduced access to the elevator)	- Efforts will be made during design and construction phase to limit the impact of construction work on service delivery (dust, noise etc.) - Improved service delivery and efficiency	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings - Presentation materials - Internships (for UCG technical faculties)	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

			- Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
Older persons (users of public services especially patients)	- Enhanced environment of public buildings with better service deliveries	- Dissatisfaction due to the potential impacts that may be caused by construction works that might worsen service delivery and the accessibility of the building to elderly (i.e. reduced access to the elevator, changes in organization of spaces)	- Efforts will be made during design and construction phase to avoid reorganization of spaces (minimal changes to layout) and limit the impact of construction work on accessibility of the building. - Improved service delivery and efficiency - Presentation - of GRM	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Meetings, including with constructor to raise awareness on the needs of vulnerable group - Use of notices, signage and information materials in accessible formats for elderly (i.e., large print) - Use of Physical Barriers and Markings (i.e. tactile pads, raised strips for	- Frequency: once during phase - Responsibility Contractor and Supervising engineer under supervision of PIU

					altered routes and layouts) - Use of temporary structures (i.e. ramps) that comply with accessibility standards for elderly	
Victim and witnesses	Enhanced environment of public buildings with better service deliveries	- Potential impacts on safety of the building during energy renovation works due reduced access to dedicated rooms for victims and witnesses, difficulties in securing separate flows (direction of moving within the building organised to avoid contacts between vicitms and witnesses with potential suspects	- Efforts will be made during design and construction phase to assure a room for victims and witnesses and to organise, as much as possible, separate flows through space management of the building and management of the time in which victims, witnesses and eventual suspect	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project - Grievances and level of satisfaction regarding grievance resolution	- Meetings - Web site - Information notices on construction sites - bulletin boards of judicial buildings	- Frequency: at least once during phase - Responsibility: - Designer under the supervision of PIU

			- are present in the building - Improved service delivery and efficiency - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM			
- LGBT+Q students and teaching staff, Roma students and staff and economically marginalized people	- Enhanced environment of public buildings with better service deliveries	- Construction workers or contractors may not trained on sensitivity and inclusivity towards LGBT+Q individual or members of ethnic minorities - Eventual temporary closures or relocation of classrooms, offices, or services during renovation may lead to	- Efforts will be made during design and construction phase to avoid relocation of classrooms, offices or services that might generate additional cost or result in more time spent for commuting - Presentation of project, timeframes, WBs	- Collect needs and feedbacks related to the buildings - Interest/Concerns related to project - Grievances and level of satisfaction regarding grievance resolution	- Meetings - Web site - Information notices on construction sites - bulletin boards of judicial buildings	- Frequency: at least once during phase - Responsibility: - Designer under the supervision of PIU

		additional time and money for communitng to alternative sites, increasing financial and time burdens.	ESF and related tools obligations for contractor to develop and implement Code of conduct and increase awareness of workers against SEA/SH - Presentation of GRM			

Postconstruction phase

STAKEHOLDER ENGAGEMENT PLAN
Postconstruction phase Timeframe: *2026-2030*
Objective: Collect productive and meaningful feedback from key stakeholders on the satisfaction of completed renovation Collect productive and meaningful feedback from key stakeholders on the implementation of the project at each location (i.e. the way design and construction phase were implemented) Collect productive and meaningful feedback from key stakeholders on the level of satisfaction on grievance resolution
Activities of Postconstruction phase: Mobilize/implement post construction phase communications activities Conducting stakeholder engagement (including surveys, workshops) Collect, systematize, analyze and prepare responses on feedback received

Inputs for construction phase: Program of outreach for the sub-project level (i.e. surveys, workshops) Communication tools: Summary per location, PPTs, surveys, press releases
Outputs Summary of feedback received during stakeholder engagement. Identification of recommendations/revisions to incorporate into design in future locations and project

Stakeholder engagement plan for Postconstruction phase

Stakeholders	**Benefits**	**Risks**	**Key messages and topics**	**Areas where Feedback is Sought**	**Methods for Engagement**	**Frequency and responsibility**
Management staff of selected UCG buildings, Management staff of other public institutions	- Manage a higher quality/modern facility - Satisfied staff due to the enhanced working environment - Improvement in of working environment reflects in better service delivery	- Resistance from staff and users due to potential lack of satisfaction with works conducted	- Improved service delivery and efficiency -	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility PIU

Staff of selected UCG buildings, staff of other public institutions	- Enhanced working environment - Better service delivery and more satisfied users	- Resistance from staff and users due to potential lack of satisfaction with works conducted	- Improved service delivery and efficiency	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility Contractor under supervision of PIU, PIU
Students of selected UCG buildings and their associations;	- Better service delivery	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency -	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey - Workshops	- Frequency: once during phase - Responsibility Contractor under supervision of PIU, PIU
Users of public services (other than UCG students)	- Better service delivery	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility Contractor under supervision of PIU, PIU
- Associations representing staff of selected UCG buildings; - Associations representin	- Better service delivery -	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility PIU

g staff of public institutions; - Associations representing users of public services impacted by the project						
- Local and national media, Local authorities	- To inform general public about project activities	- Correct and clear information on project activities not available	- To provide correct and clear information on project activities if requested	- Quality of material and Information provided	- Presentation materials - Press releases - agency Press Service	- Frequency: once during phase - Responsibility PIU
- Women	- Better service delivery -	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency -	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility - PIU
- Persons with disabilities	- Better service delivery -	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility - PIU

- Older persons (users of public services especially patients)	- Better service delivery	- Lack of satisfaction with works conducted	- Improved service delivery and efficiency	- Grievances and level of satisfaction regarding grievance resolution or non-resolution	- Meetings - Presentation materials - E-mail - Phone - Survey	- Frequency: once during phase - Responsibility - PIU

Proposed strategy for disclosure:
All ESF draft tools and documents will be disclosed before Project Appraisal takes place. ESF documents (i.e. ESMF, ESCP, LMP, RPF and Project level SEP) will be disclosed electronically and will be available in English version. The documents will be available for public consultation for at least 15 days on the websites of the Implementing Agencies:

- https://energetska-efikasnost.me/
- www.cedis.me

Notices inviting the public to consultations swill be posted on the websites of the Implementing Agencies and disseminated through all relevant digital platforms and at least one reputable print media outlet. The notices will be issued at least 15 days prior to the scheduled consultation event, allowing the public sufficient time to review the documents before the meeting. Notices will define methods for stakeholders to submit their comments, both in person and online and will be adapted to be easily consulted by persons with disabilities. Implementing Agencies will organize consultation events in premises that are adapted and accessible by persons with disabilities. Detailed reports of the consultations, including how comments were addressed, will be well-documented and added as Annexes to the SEP that will then be re-disclosed on the websites of the Implementing Agencies.

Institutional stakeholders (i.e. representatives of municipalities, line ministries of public institutions selected in Component 1) will be engaged through e-mail communication with the ESF tools attached.

Eventual significant up-dates of ESF documents during project implementation, as well as additional ESF tools developed specifically for selected locations (such as ESMPs, ESMP Checklists) will be disclosed and open for public consultation again for at least 15 days. Information on public engagement activities undertaken by the Project will be conveyed to the stakeholders through short annual reports published on Implementing Agencies web sites.

Printed copies will be made available at the PITs and PIU premises and during public consultation.

The Project will be announced through Radio, TV, written and electronic media as well as all available official social media accounts and web pages.
During Project Implementation any of the documents disclosed during preparation, if updated shall be re-disclosed and public consultations held.
Site specific management instruments developed to manage environmental and social risk and impacts such as Environmental and Social Management Plans (ESMPs), will be disclosed.

Contractors documents related to management of environmental and social risks (these may include traffic Management Plan, Emergency preparedness and response plans, Codes of Conduct for Employees and Contracted workers etc) shall be made available at Contractors website. Information on timing of project activities and related information shall be made public via various media, newspaper and radio at least 2 weeks prior to actual execution.
During the Project development and construction phase, the Technical and Environmental specialist will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan. Monthly reports will be used to develop quarterly

reports. The quarterly reports will be disclosed on the Project website and made available at the level of project.

Stakeholder expansion

The list of stakeholders can be revisited / updated during project implementation, especially if new locations for energy efficiency renovation are selected. The activity can be carried out within the regular Monitoring & Evaluation (M&E) of the Project. The potential tool to expand lists of stakeholder is found below.

Table 5: Stakeholder expansion tool

STAKEHOLDER EXPANSION AND UPDATE NEED QUESTIONNAIRE	
□ YES □ NO *If No the Project needs to expand the Stakeholder list*	Is the current list focused on relevant stakeholders who are important to our current and future efforts as well as project locations?
□ Yes □ No *If No the needs assessment should be conducted and Stakeholder list expanded / updated*	Do we have a good understanding of what are stakeholder needs and concerns, what they may want, whether they would be interested in engaging with the Project, and why?
□ Yes □ No *If No the needs assessment should be conducted and Stakeholder list expanded / updated*	Does the current engagement strategy adequately covers vulnerable groups?

1.7. Resources and Responsibilities for implementing stakeholder engagement activities

Management functions and responsibilities

The development of project SEP, its implementation, the disclosure and consultation activities, as well as functioning of GRM will be responsibility of the PIU established by the Implementing Agency for Component 1, the Ministry of Energy (MoE). To ensure successful SEP implementation during the implementation of project, as well as implementation of the abovementioned activities, the Technical and environmental expert as a PIU staff, will regularly monitor on the implementation of the SEP and report to the WB. All stakeholder engagement activities mentioned in table above will be financed by the budget of the implementing agencies and/or project funds.

Resources

The budget for the SEP is included in Component 3: Technical Assistance and Project Implementation Support of the project.

Tentative budget categories and amounts for the implementation of stakeholder engagement activities can be find below.

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
1. Estimated staff salaries and related expenses					
1b. Travel costs					
2. Events					
2a. Organization of workshops in selected UFC buildings and other public buildings					
3. Trainings					
3a. Training on social/environmental issues for PIU, designer, contractor and supervising engineer staff					
4. Beneficiary surveys					
5a. Survey before renovation / construction works					
5b. Survey after renovation / construction works					
5. Grievance Mechanism					
6a. Training on GRM for PIU, designer, contractor and supervising engineer staff					
6b. GRM communication materials					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

The stakeholder engagement activities will be documented primarily through Minutes of Meetings, Grievance logs, Reports from workshops and press clippings.

1.8. Grievance Mechanism

The main objective of a GM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

Description of Project GRM

A Grievance Redress Mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints, feedback, questions, and suggestions from citizens and affected communities at the level of the project.

A well-designed grievance mechanism is accessible, effective, easy, understandable and without costs to the complainant. The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and will follow the required procedures. All grievances lodged, regardless of the project phase or activity being implemented, should follow one single mechanism.

Considering the above, the GRM is intended to serve as a mechanism to:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the project.
- Strengthen accountability to beneficiaries, including project-affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns.

Having an effective GRM in place will also serve the objectives of reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project management regarding the strengths and weaknesses of project procedures and implementation processes.

Although the Project's Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) and Sexual Exploitation and Abuse/Sexual Harassment risk was assessed as low (because of (i) the expected local employment and (ii) expected low number of workers on construction sites) the GM will, on a precautionary base, be enabled to recognize SEA/SH grievances.

During design phase a representative of hired advisor (i.e. architect, engineering bureau etc.) will be responsible for addressing grievances of citizens and stakeholders (i.e. management staff and staff of selected UCG buildings, management staff and staff of other public institutions, students and their associations, users of public services and their associations and vulnerable groups). Contact information to this person will be made available to the public at all selected locations during design phase.

During construction / renovation works phase, a representative of the contractor (i.e. site manager) will be responsible for addressing grievances of citizens and stakeholders. Contact information to this person will be made available to the public at all locations where the works are being performed. The available telephone number and mail of the named person, based on good experiences of previously implemented projects (MEEP2) is a good way to solve all complaints in the right way.

During post-construction phase, a representative of the contractor (i.e. site manager) will be responsible for addressing grievances of citizens and stakeholders at least during the duration of the defined period for the removal of defects (usually 1 years after the end of works). Contact information to this person will be made available to the public at all locations where the works are being performed.

Contracts with the advisor (design phase) and contractor (construction/renovation phase and post-construction phase) shall specify that all complaints received should be communicated to the PIU Social Specialist, who will add these complaints to the grievance log and to the Project Coordinator. Furthermore, during construction/renovation phase complaints should be communicated to the supervising engineer. Moreover, contracts shall specify the obligation of the advisor, supervising engineer and contractor to participate in eventual training activities on WBs ESF and GRMs that are organized and/or selected by the PIU.

The grievance redress mechanism is organized as two-level mechanism, while the second level of appeal shall occur, if the complainant is unhappy with the result of the grievance resolution process. It will be

possible to bring grievances to the attention of responsible persons personally, verbally by telephone, or in writing through e-mail, post, fax or personal delivery.

Project-affected persons will have the possibility to voice their complaints to:

- PIU, Technical and environmental expert: Rimski trg 46, Podgorica, e-mail address: martina.bjeletic@ee-me.org. Phone and fax number will be included in particular ESMPs.

Grievances will be systematically acknowledged: an interim reply will be sent within 3 working days of receipt and provide the complainant with basic information about next steps. This will be followed by an investigation stage, during which the Technical and environmental expert of the PIU will try to understand the issue from the perspective of the complainant and what action may be required, examine factual evidence and circumstances, carry out complementary research, interview parties involved and confer with relevant stakeholders as appropriate. Once investigated, and depending upon the severity and type of grievance, a provisional decision shall be discussed with the complainant in order to find a satisfactory solution. Unilateral announcements shall be an exception. If an agreement is found, it should be specific and time-bound and will be communicated to the complainant in writing within one month of the grievance receipt. The grievance will be considered "closed" after the implementation of the resolution has been verified. Even when an agreement is not reached, or the grievance was rejected (for example because it did not fall under the scope of the project), actions undertaken, status of the case (e.g. pending due to investigation, closed) and results achieved will be systematically documented.

The PC shall keep a grievance register log that will record the following information at minimum:

- Name of complainant (if treated as non-confidential)
- Location and address of Complainant (if available),
- Location concerned by the grievance;
- Date the grievance was received;
- Date of receipt acknowledgement returned to the complainant;
- Channel through which the grievance was received;
- Brief description of grievance;
- Classification/type of grievance (level of impact on the project);
- Description of actions taken (investigation, corrective measures)
- Current status of grievance;
- Date of resolution and closure
- Feedback from Complainant on level of satisfaction

In order to monitor the efficacy of the GRM, the following indicators may be used: (i) number of grievances received/resolved; (ii) number of grievances acknowledged within the 3-day timeframe; (iii) number of grievances resolved within one month from receipt.

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

Workers GRM

A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measure will be put in place to make the grievance mechanism easily accessible to all such project

workers. Project workers should be able to raise concerns regarding unsafe or unhealthy work situations through the grievance mechanism.

Contracts with contractors and advisors shall specify the obligation to inform workers on Workers GRM and to make relevant contacts available, especially in case of civil works in the selected locations.

The workers GRM will include:

- A channel to receive grievances such as comment/complaint form, suggestion boxes, email.
- Stipulated timeframes to respond to grievances.
- A register to record and track the timely resolution of grievances.
- A responsible person/section/committee to receive, record and track resolution of grievances.

The PIU will review the records and report on the workers grievances, response time and resolution status in a semi-annual report to the WB. The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The point of contact regarding project and workers grievance management are:

- Technical and environmental expert: Rimski trg 46, Podgorica, e-mail address: martina.bjeletic@ee-me.org. Phone and fax number will be included in particular EMPs.

Other mechanisms that can be used to submit complain related to the project are those established by the WB (described below).

WB's complaint mechanisms practice

Project stakeholders and citizens can also submit complaints regarding the project activities through the World Bank Grievance Redress Service (GRS). Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to existing project-level grievance-redress mechanism or to the WB's (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel (IP), which determines whether harm occurred, or could occur, because of the WB noncompliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management (BM) has been given an opportunity to respond. For information on how to submit complaints to the WB's GRS, please visit: http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service.

For information on how to submit complaints to the WB's Inspection Panel, please visit www.inspectionpanel.org.

The World Bank and the Borrower and Implementing Agencies do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

1.9. Monitoring and Reporting

Summary of how SEP implementation will be monitored and reported

Reporting is an integral part of the monitoring process as it provides valuable insight into project processes as well as decision-making information to the Project Implementation Unit (PIU) and WB teams. Consequently, it enables timely interventions and adjustment of corrective measures. Unless differently agreed, the PIU will report on the implementation of ESF tools including SEP in regular progress reports and upon request of WB Environmental and Social Specialists. Stakeholders will be kept informed on project environmental and social performance on the implementation of project SEP and GRM, as well as on the project's overall implementation progress through short reports published on the websites of the Implementing Agencies: Ministry of Energy and CEDIS.

At the level of each selected location particular focus of monitoring and reporting will be given:

- during design phase on the involvement and collection of needs and concerns of the users of selected buildings (in particular management staff and staff of selected UCG buildings, management staff and staff of other public institutions, students, users of public services and vulnerable groups),
- during construction / renovation phase on the involvement and collection of grievances and concerns of the users of selected building and construction workers as well as on the dedicated Labor related GRM mechanisms

During implementation of works regular monthly meetings are foreseen among "construction" stakeholders (i.e. contractors, supervising engineer, construction project manager (where relevant), designer; occupational health and safety (OHS) specialist) and monthly meetings with PIU and Implementing Agencies representatives. Contractual obligation of the supervising engineer will include to write minutes from the held meetings and distribute it to all stakeholders for confirmation. The monitoring of implementation implies constant communication among contractors, supervising engineer, construction project manager (where relevant), designer; occupational health and safety (OHS) specialist, the PIU and Implementing Agencies representatives and the management staff of UCG and other public institutions. Monitoring also includes control of reports submitted by the Supervising Engineer and Contractor and on-the-spot checks. PIU will conduct on-the-spot checks in all stages of the project (ad hoc or related to the payments). During the implementation of the contract, it is possible to hold additional ad hoc meetings (regardless of the party organizing it) at which the PIU is required to participate depending on the assessment, to monitor the implementation and to resolve possible difficulties related to the implementation of the contract.

More particularly, the contractor and the supervising engineer will report on relevant ESF tools to the PIU, monthly. In the case of significant non-compliance, the PIU will, without delay, inform the WB Environmental and Social Specialists of the nature, size, and scope of the impact. Unless differently agreed with the WB Environmental and Social Specialists, the PIU will report on implementation compliance with ESF tools in regular annual progress reports (when reporting on SEP) and upon request of WB Environmental and Social Specialists. In the case the Contractor and/or Supervising Engineer breached the measures defined in relevant ESF tools and/or applicable national regulation, and incompliance is confirmed, the PIU will propose corrective measures as well as the timeframe (deadline) for the implementation. If the corrective measures are not implemented and compliance criteria does not met within the defined timeframe, the PIU can consider withholding the payment until the Contractor / Advisor responses to these requirements and requests and compliance is accomplished and re-confirmed (either through a location inspection or desk review).

Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Semi-annual summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project.

The PIU will report on the implementation of ESF tools including SEP in regular progress reports and upon request of WB Environmental and Social Specialists. Information on public engagement activities undertaken by the Project will be conveyed to the stakeholders through short annual reports published on Implementing Agencies web sites.

1.10. Annexes

Annex I Report from stakeholder consultation during project preparation

TO BE INSERTED UPON STAKEHOLDER CONSULTATION

Annex II Public grievance registration form

GRIEVANCE REDRESS FORM	
MONTENEGRO ENERGY SECTOR DECARBONIZATION PROJECT (MESDP) Montenegro Ministry of Energy Montenegro Electric Distribution System - CEDIS	
Note: If you prefer you can remain anonymous	First name _____ Last name _____ □ I wish to raise my grievance anonymously □ I request not to disclose my identity without my consent
Contact Information: Please mark how you would like to be contacted (mail, phone, e-mail)	□ By Post on the following address: _____ □ By Telephone: _____ □ By E-mail _____ □ I don't wish to be contacted
Preferred Language for communication	□ Montenegrin □ Other please specify
Description of Incident or Grievance:	
Date of Incident/ Grievance	
What would you like to see happen to resolve the problem?	
Signature: _____ (not required in case of anonymous complaints) **Date: _____**	
Please return this form to: PIU Technical and environmental expert Martina Bjeletić Rimski trg 46, Podgorica, e-mail address: martina.bjeletic@ee-me.org	

Montenegro Energy Sector Decarbonization Project (MESDP)

P505964

STAKEHOLDER ENGAGEMENT PLAN (SEP) FOR COMPOMENT 2

DRAFT VERSION

September 2024.

1.11. Introduction/Project Description

The objective of the Montenegro Energy Sector Decarbonization Project (MESDP) is to improve energy efficiency of public buildings and enhance operational efficiency of the electricity distribution grid in Montenegro.

The Implementing Agencies of the project are the Ministry of Energy and Crnogorski elektrodistributivni sistem (CEDIS) (eng. Montenegrin electric distribution system)

The Project consist of three (3) Components as shown in the Table 1.

Table 2. Project components

Component 1 Improving Energy Efficiency of Public Buildings	
Activities	Carry out energy efficiency renovations in National University buildings and selected Public buildings by implementing a range of EE Measures
	Operationalize the budget capture scheme for EE renovations established under MEEP2
Component 2 Enhancing Operational Efficiency of the Electricity Distribution Grid	
Activities	Replace power distribution transformers
	Retrofit the switchgear on the 35 kV side of a 110/35 kV substation
	Install/replace 100,000 smarts meters and finance grid digitalization investments
	Upgrade distribution grid code and enhance integrated system planning
Component 3 Technical Assistance and Project Implementation Support	

This SEP covers Component 2 - Enhancing Operational Efficiency of the Electricity Distribution Grid.
The component 2 of the project will be implemented by CEDIS and will finance investments aimed at improving the operational efficiency and reliability of Montenegro's distribution grid, improving the visibility of the Low Voltage (LV) network, and laying the foundations for a wide-scale adoption of smart grid solutions. These investments will contribute to enabling the integration of the rapidly growing Rooftop Solar Photovoltaic (RSPV) installations into the distribution grid, by enhancing its resilience to solar output fluctuations and allowing CEDIS to make more informed decisions on new connections. This component will be implemented by CEDIS and is structured around three subcomponents: (i) Subcomponent 2.1: Retrofit of 35kV switchgear in primary substations, (ii) Subcomponent 2.2: Replacement of old medium-voltage/medium-voltage (MV/MV) and medium-voltage/low-voltage (MV/LV) transformers, and (iii) Subcomponent 2.3: Pilot investments to improve the visibility of the low-voltage (LV).

Subcomponent 2.1. Retrofit of 35kV switchgear in primary substations

This subcomponent will finance the rehabilitation and upgrade of electrical switchgear in seven (7) primary substations to reduce technical losses and improve the reliability of power supply. A few years ago, CEDIS took over from CGES the 35 kV side of sixteen (16) 110/35 kV substations around the country. Out of these 16 substations, 7 (Pljevlja 1, Nikšić, Tivat, Ulcinj, Budva, Bar, and Berane) have been identified as requiring urgent rehabilitation to replace old switchgear equipment that poses a threat to the reliability of power supply. In addition to replacing old equipment, this subcomponent will finance the supply and installation of: (i) additional 35 kV sections to allow for further expansion of the network and remove bottlenecks for the connection of RE capacity, (ii) AC/DC auxiliary voltage and backup power supply

systems, and (iii) a substation-level SCADA system to monitor and manage the 35 kV switchgear and communicate with the grid-level SCADA. The procurement and installation of the new equipment will be handled under an Engineering, Procurement, and Construction (EPC) contract. Where deemed necessary, these investments will be designed to also enhance the resilience of the infrastructure to climate-related hazards (e.g., by improving drainage to reduce risk of flooding).

Subcomponent 2.2 Replacement of old MV/MV and MV/LV transformers

This component will finance the replacement of thirty-eight (38) old MV/MV and MV/LV transformers with efficient eco-design transformers to reduce technical losses and improve the reliability of power supply. The transformers that will be replaced include: (i) thirty-six (36) 35/10 kV transformers located in twenty-seven (27) MV/MV substations around the country, and (ii) two (2) 10/0.4 kV transformers located in two different 10/0.4 kV substations. The transformers to be replaced have been selected because they are the oldest units (installed between mid-1960s and mid-1980s), they are located in areas experiencing voltage issues, and they do not comply with CEDIS's Rulebook on Technical Requirements for Eco-Design Transformers (CG 95/23), which will come into force on January 1, 2025. Six (6) of the 35/10 kV transformers and the two MV/LV transformers will be equipped with on-load tap changers (OLTC), as they are located in areas that have been experiencing voltage regulation issues, also as a result of an increasing penetration of RSPV installations. OLTC is a new technology for CEDIS, so the adoption of OLTC transformers will allow the company to pilot this new equipment and build capacity for a potential subsequent wider-scale adoption of this technology to further improve the reliability of the grid and enable the integration of additional RE capacity. Where deemed necessary, these investments will be designed to also enhance the resilience of the infrastructure to climate-related hazards (e.g., by using higher design standards for transformers to withstand extreme conditions).

Subcomponent 2.3 Pilot investments to improve the visibility of the LV network

This component will pilot technological solutions to monitor the operational performance and improve the visibility of the LV network. Investments will include the installation of meters and sensors together with accompanying systems, such as specialized software and an Application Programming Interface (API) to integrate the new devices with the MDM system currently under development and the SCADA and ADMS to be implemented by CEDIS under a project financed by EBRD. The meters and sensors will be handled by one of the three head-end systems currently operated by CEDIS and will provide information and alerts on key electrical parameters (e.g., voltage, current, power, energy, harmonic distortion) needed by CEDIS for system planning and operation in the context of the rapidly increasing penetration of RSPV. Besides investments in distribution infrastructure, the component could assist CEDIS in developing a smart grid development strategy, upgrading distribution grid code, enhancing integrated system planning, and designing cybersecurity measures in the context of the increasing reliance on digital communication and control systems for grid management and operation. The detailed design of the interventions under this subcomponent will rely on a technical and feasibility study that will be financed under component 3 and will be aligned with the investments planned by CEDIS under the new project financed by EBRD.

The MESDP Project is being prepared under the World Bank's Environment and Social Framework (ESF). Per Environmental and Social Standard ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agencies should provide stakeholders with timely, relevant, understandable, and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination, or intimidation.

1.12. Legal and institutional framework

Law on Free Access to Information

The Law on Free Access to Information (CG 44/12, 30/17) aims to enhance transparency and guarantee public access to information held by public authorities. It grants every natural or legal person the right to access information possessed by state bodies, local governments, public companies, and other entities that carry out public functions. This right covers information in all forms, whether it be written, electronic, or other formats. Public authorities are mandated to respond to information requests within 15 working days, either by providing the requested information or by justifying any refusal based on specific legal grounds. The law also establishes an appeal process for instances where access to information is denied. These appeals can be lodged with the Agency for the Protection of Personal Data and Free Access to Information, which is tasked with overseeing the law's implementation and ensuring adherence. While the law is designed to promote transparency, it also specifies certain exceptions where access to information may be restricted. Such restrictions are applicable in cases where disclosure could potentially harm national security, public safety, defense, or international relations. However, if it is determined that the public interest in disclosure outweighs the potential harm, the information must still be released. The law also includes provisions for imposing fines on public bodies that fail to meet their obligations related to information access, thereby ensuring accountability. It encourages public authorities to proactively disclose information about their activities, such as decisions, policies, and financial reports, to minimize the need for individual requests. Moreover, the law addresses the protection of personal data, ensuring that the right to access information does not infringe on individual privacy rights.

Law on the Protection of Personal Information

The Law on the Protection of Personal Information (CG 79/8, 70/9, 44/12, 22/17) is a legal framework designed to safeguard the personal data of individuals within the country. This law aligns with international standards and principles, particularly the European Union's General Data Protection Regulation (GDPR). The law applies to the processing of personal data by public and private entities within Montenegro. Personal data is broadly defined to include any information that can directly or indirectly identify an individual. The law outlines specific legal grounds for processing personal data, such as consent from the individual, the necessity of processing for the performance of a contract, compliance with legal obligations, protection of vital interests, public interest, and legitimate interests of the data controller. Individuals have several rights regarding their personal data, including the right to access, correct, delete, and restrict the processing of their data. They also have the right to object to processing and to data portability. The law provides mechanisms for individuals to exercise these rights, with obligations on data controllers to respond to requests within specified timeframes. Consent must be freely given, specific, informed, and unambiguous. Data subjects must be able to withdraw their consent at any time without negative consequences. Data controllers and processors are required to implement appropriate technical and organizational measures to ensure data security.

In case of a data breach, the law mandates that the supervisory authority and affected individuals be notified promptly if the breach poses a risk to individuals' rights and freedoms. The law establishes a supervisory authority responsible for overseeing compliance, handling complaints, conducting investigations, and imposing penalties for violations. This authority has the power to audit organizations, issue warnings, and impose fines for non-compliance. The law stipulates significant penalties for violations, which can include fines and other sanctions. The severity of penalties is proportionate to the

nature and gravity of the breach, taking into account factors like the level of negligence and the impact on data subjects.

Aarhus Convention

Montenegro is party to the United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters done at Aarhus, Denmark, on 25 June 1998, which is based on three pillars:

- **The right to information**: citizens have the right to access environmental information held by public authorities upon request;
- **The right to participate** in decision-making during the preparation of plans, programs, policies and legislation relating to the environment; and
- **The right to justice**: citizens have the right to access justice regarding environmental matters; to challenge a refusal or inadequate response to request for information; and to challenge the legality of a plan or challenge actions or omissions that contravene national environmental law.

Any member of the public has the right to submit communications to the Aarhus Convention Compliance Committee concerning alleged non-compliance of a party with the Convention.

1.13. Social risks and impacts

Some of the social risks identified for Component 2 are typical for small-scale construction works needed to replace the equipment of 35kV switchgear in 7 primary substations; to replace old MV/MV and MV/LV transformers (37 type 35/10 kV transformers located in 29 MV/MV substations around the country, and 2 type 10/0.4 kV transformers located in 2 different 10/0.4 kV substations) as well as to install smart meters and sensors for approximately 6.000 consumers. The civil works and installation of equipment are small in magnitude and as such the impacts can be easily and predictably avoided, minimized and mitigated by proper organization of construction site, continuous communication with all stakeholders and through other ESF tools and national legislation, in particular through the development and implementation of project stakeholder engagement plans and grievance redress mechanisms as well as through the development and implementation of labor management procedures.

The replacement of switchgear, transformers, as well as the installation of smart metering systems for consumers may necessitate temporary power outages. These outages could disrupt daily life of citizens living and/or working in the area. Outages can affect vulnerable groups, in particular the elderly persons and persons with disabilities that depend on electricity powered medical equipment and devices for accessibility (i.e. elevators).

Community health and safety

Community health and safety risks typical for construction / renovation works:

- Increased noise and vibrations caused by increased traffic, use of machinery and equipment at the construction/renovation site.
- Traffic accidents for pedestrians caused by increased and inadequately organized traffic (transportation of materials, equipment and workers);
- Temporary closing of roads without ensuring adequate transport routs may cause inconvenience for local population.
- Disruptions in utility services due to accidents or planned interventions (water, gas, electricity).
- Poor occupational health and safety practices

- Inadequate disposal of waste from construction site polluting the community environment (including inadequate management of asbestos waste and exposure of local community with asbestos – if proved to be presence of asbestos on any of the sites).

In addition, potential community risks related to foreign labor influx are present. Although contractors and workers employed in construction activities are likely to be locally based, there is a potential of labor influx and contractor may engage foreign workers (local from outside the sub-project area or foreigners). Potential risks and impact on community related to foreign workers due to difficulty of their integration into community are present (e.g., the feelings of anxiety and fear for unsafe environment among the local residents when there are foreign workers living in the same building or in vicinity).

Labor management risks

This Project will most likely include all categories of project workers defined by ESS2, except community workers (direct workers, contracted workers, and primary supply workers). Beside direct workers (persons employed or engaged directly by the implementing agencies such as technical, and environmental experts, architects, civil engineer, procurement, financial management employed within the PIU or by the Implementing Agencies, etc.) both low and high-quality skilled workers, are expected to be engaged by contractors and sub-contractors (i.e. construction company, supervision company). Beside the OHS risks potential labor risks in relation to civil works are related to working conditions and treatment of the project workers during implementation of works (e.g. employment and working conditions, membership and participation in workers' or employers' associations or in any other professional organization, etc.). It can be expected that the greater number of low skill workers will be engaged, including the foreign workers as previously described. Foreign workers can be seen as a vulnerable group due to their non-existent social networks, obstacles in exercising all social rights, and higher general exposure to potential discrimination.

Sexual Exploitation and Abuse/Sexual Harassment (SEA/SH)

With respect to GBV, the risk is low as there will only be small size civil works.

Montenegro has had a national law in place prohibiting workplace harassment, including sexual harassment, since 2012. Additionally, the country ratified the Istanbul Convention in 2013.

With respect to GBV, the risk is low as there will only be small to medium size civil works. The project is expected to engage some contractors and workers and will not include type of works which would initiate large labor influx. The project works will take place in areas which can be supervised. In spite of low GBV risk the project will institute a Code of Conduct for project workers and a dedicated grievance mechanism to receive confidential SEA/SH complaints. The project workers including those engaged on the small construction/installation works n will receive training on the prevention of SEA/SH.

Lack of communication and information exchange

There are potential risks of poor or a lack of communication and information exchange among relevant stakeholders including local community. For all works and equipment replacement continuous stakeholder engagement through all project cycle should be ensured as well as easily accessible GRM mechanisms, both for public and project workers. Particular attention should be given to ensure clear and comprehensive communication and information about potential power outages that could disrupt daily life of citizens. Meaningful consultation and stakeholder engagement shall be conducted during the whole life-cycle of the of the subprojects.

Temporary power outages

The replacement of switchgear (subcompoment 1) and transformers (subcompoment 2), as well as the installation of smart metering systems for consumers (subcompoment 3), may require no-voltage conditions, leading to planned power outages. These outages have the potential to disrupt daily life, particularly for vulnerable populations, the elderly and individuals with disabilities, that can be dependent on electrically powered medical equipment and accessibility devices such as elevators, and stairlifts. Moreover, power outages can impact the provision of healthcare services (outpatient services, diagnostic labs, and electronic medical records systems), of emergency services such as police, fire departments, and ambulance services and for municipalities create concerns on failure of traffic lights, increasing the risk of accidents and traffic congestion. Furthermore, concerns arise for educational activities if power outages occur during extreme weather conditions where heating or cooling is essential. Public administration functions can be delayed by power outages. Citizens can face disruptions in functions of phone networks, internet services, and other communications systems impacting everyday communication, disruptions in lighting, heating/cooling systems, and the ability to use household appliances such as refrigerators, cooking devices, and washing machines.

For the replacement of switchgear in Subcomponent 1, several planned power outages, each lasting a few hours, will be required. The number of consumers at each location potentially affected by these no-voltage conditions is as follows:

- TS 110/35kV Budva – 40,727 consumers
- TS 110/35kV Tivat – 19,128 consumers
- TS 110/35kV Ulcinj – 18,260 consumers
- TS 110/35kV Bar – 38,495 consumers
- TS 110/35kV Berane – 25,583 consumers
- TS 110/35kV Nikšić – 23,206 consumers
- TS 110/35kV Pljevlja – 22,070 consumers

In Subcomponent 2, among all planned transformer replacements, five locations have only one energy transformer each (TS Ponari, TS Ubli, TS Bioče, TS Gusinje, and TS Čokrlije). For these sites, a no-voltage condition (power outage) will be required, with an average duration of 3-4 hours, depending on the specific work needed at each facility. The maximum disconnection duration could extend to 8 hours. For substations equipped with two energy transformers, replacements are planned during periods of the year when consumer load permits the operation of just one transformer, thereby avoiding the need for power outages. The number of consumers at each of the five locations with a single power transformer potentially affected by no-voltage conditions in Subcomponent 2 is as follows:
TS 35/10kV Ponari – 1,566 consumers
TS 35/10kV Ubli – 1,506 consumers
TS 35/10kV Bioče – 664 consumers
TS 35/10kV Gusinje – 1,992 consumers
TS 35/10kV Čokrlije – 1,937 consumers

In Subcomponent 3, the plan involves installing approximately 6,000 smart metering devices in consumer facilities. These installations will occur individually at specific consumer locations on the network. As a result, any supply interruptions will be localized in the facility of the consumer and brief, typically lasting no more than 20 minutes, and possibly even less, since the replacement process is straightforward.

In their usual business practices and procedures CEDIS takes several measures to mitigate the impact of power outages on consumers:

- Scheduled outages during low-demand periods such as early morning hours. This helps minimize the disruption to daily activities of consumers.
- Advance notification advance notice to consumers about planned outages. This allows consumers to prepare for the temporary loss of power, reducing the inconvenience.
- Minimizing duration of the power cuts, i.e. less than 20 minutes for the installation of smart metering devices
- Minimizing the likelihood of power outages, in stations with 2 transformers, replacements are planned during periods of the year when consumer load permits the operation of just one transformer

CEDIS has a detailed process for informing the public about planned outages and network issues to ensure transparency and minimize disruption. Through various communication channels, CEDIS ensures that all stakeholders are well-informed about upcoming outages, helping them to plan accordingly and reduce the impact on their daily activities

The process of informing the public is as follows:

- the Maintenance Department plans the works, which are then coordinated with the Network Management Department. Both departments fall under the Operational Directorate.
- The Network Management Sector sends the worklists to the Corporate Communications Service at least two days before the planned work.
- The Corporate Communications Service sends notifications to all media outlets and CEDIS website 48 hours in advance, ensuring the public and businesses can prepare for the power outages.
- Daily updates on planned works are published on the official CEDIS website (cedis.me) and the CEDIS Facebook page (facebook.com/cedisonline). These platforms provide the most current information regarding scheduled outages.

1.14. Objective/Description of SEP

The overall objective of this SEP is to define a program for stakeholder engagement, including public information disclosure and consultation throughout the entire project cycle. The SEP outlines the ways in which the project team will communicate with stakeholders and includes a mechanism by which people can raise concerns, provide feedback, or make complaints about project activities or any activities related to the project.

The key objectives of the SEP can be summarized as follows:

- Build ownership over the project outcomes among key stakeholders to promote collaboration, enhance probability of successful outcomes through ensuring key stakeholder participation.
- Start early in the project planning process in order for the initial feedback to be gathered from the participants and to enable modifications in the project design, as needed.
- Avoid, minimize, or reduce social risks that can negatively affect and/or jeopardize implementation of project through proactively identifying risks and concerns with stakeholders and preventing or mitigating these risks through transparent and agile communication channels.
- Provide guidance for stakeholder engagement.
- Identify key stakeholders that are affected, and/or able to influence the Project and its activities.
- Identify the most effective methods, timing, and structures through which to share project information, and to ensure regular, accessible, transparent, and appropriate consultation.
- Develop a stakeholders engagement process that provides stakeholders with an opportunity to influence project planning, design, and implementation by generating structured channels for ongoing feedback from all project beneficiaries and partners.
- Establish formal grievance/resolution mechanisms.

- Define roles and responsibilities for the implementation of the SEP.
- Define reporting and monitoring measures to ensure the effectiveness of the SEP and periodical reviews of the SEP based on findings.

1.15. Stakeholder identification and analysis

Methodology

In order to meet best practice approaches, the project will apply the following principles for stakeholder engagement:

- *Openness and life-cycle approach:* Public consultations for the project(s) will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion, or intimidation.
- *Informed participation and feedback:* Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholder feedback, and for analyzing and addressing comments and concerns.
- *Inclusiveness and sensitivity:* Stakeholder identification is undertaken to support better communications and build effective relationships. The participation process for the projects is inclusive. All stakeholders at all times are encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders. Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups that may be at risk of being left out of project benefits, particularly women, the elderly, persons with disabilities, displaced persons, and migrant workers and communities, and the cultural sensitivities of diverse ethnic groups.

Affected parties and other interested parties

Affected parties are persons, groups and other entities within the project area of influence that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures. Specifically, the following individuals and groups fall within this category:

- Consumers (i.e. households, citizens, businesses)
- Public institutions providing key services and their representatives (i.e. kindergartens, schools, healthcare services, emergency services such as police, firefighters, ambulances)
- Local authorities such as representatives of towns and municipalities

The projects' stakeholders are also **other interested parties** that are individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way. Specifically, the following individuals and groups fall within this category:

- national and local media channels

The following internal stakeholders can also be included in the category of "other interested parties":

- World Bank
- Ministry of Finance
- Implementing Agencies: CEDIS and Ministry of Energy
- Component-specific Project Implementation Units (PIUs)
- Stakeholders in Montenegro's Energy Sector (Elektroprivreda Crne Gore (EPCG), Crnogorski Elektroprenosni Sistem (CGES), Energy and Water Regulatory Agency (REGAGEN)
- Parties involved in construction activities (Contractors, OHS specialist, Supervision engineer, Designer)

Disadvantaged/vulnerable individuals or groups[2]

Within the Project, vulnerable or disadvantaged groups are persons who may be disproportionately impacted or further disadvantaged by the project as compared with any other groups due to their vulnerable status, and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project. Disadvantaged/vulnerable individuals or groups may include but are not limited to the following:

- Elder persons
- Persons with Disabilities
- Foreign workers

Vulnerable groups within the communities affected by the Project may be added, further confirmed, and consulted through dedicated means, as appropriate. Description of the methods of engagement that will be undertaken by the project is provided in the following sections.

The following table shows the likely impact that project activities will have on the vulnerable groups while the topics and frequency of engagement is described in following paragraphs.

Group	**Impacts**	
Elderly Persons	- Elderly individuals, particularly those with chronic health conditions, are more vulnerable to the effects of power outages as they may rely on electric-powered medical devices that are critical for their health. - Difficulties to move around during a power outage, especially if elevators, powered stair lifts, or other accessibility devices are non-operational due to the lack of electricity. - Without electricity, elderly individuals are at risk from temperature extremes - Elderly person may have lower level of digital literacy and less access to	- The project will avoid impelmentaiton of works during extreme temperature events - Using usual CEDIS communication channels for power outages the project will encourage the local community (i.e. family members, neighbours, friends) to inform the elderly about the planned power outage (including expected duration and time windows) and to check on check them during outages, ensuring they have adequate food, water, and medical supplies, and helping them access emergency services if needed. - Efforts to schedule equipment

	mobile phones or other digital devices, this means that they have lower access to some of the uslual CEDIS communication channels for power autage, that can keep them informed about the outage duration or emergency services. -	replacement during times of the year and day when power demand is lower to reduce the risk of outages.
Persons with disabilities	- Individuals with disabilities who depend on electrically powered medical equipment (e.g., ventilators, mobility aids) could face health risks during outages. - Individuals with physical disabilities, such as those who use wheelchairs, walkers, or other mobility aids, may find it more difficult to move around during a power outage, especially if elevators, powered stair lifts, or other accessibility devices are non-operational due to the lack of electricity. Even navigating darkened spaces can be more challenging without adequate lighting. - Those with certain disabilities (e.g., hearing or visual impairments) may find it difficult to receive or respond to outage notifications and emergency information. -	- Using usual CEDIS communication channels for power outages the project will encourage the local community (i.e. family members, neighbours, friends) to inform the persons with disabitlies about the planned power outage (including expected duration and time windows) and to check on check them during outages, ensuring they have adequate food, water, and medical supplies, and helping them access emergency services if needed. - Efforts to schedule equipment replacement during times of the year and day when power demand is lower to reduce the risk of outages.
Foreign workers	- Exposed to potential discrimination due to their non-existent social networks and obstacles in exercising all social rights,	- The project will develop Labor management procedures in line with the requirements of EES2. Provisions of project LMP will include, among others, requirement, for the Contractor to prepare and enforce a Code of Conduct for Workers, a functional Worker GRM and Project GRM.

1.16. Stakeholder Engagement Program

Summary of needs and methods, tools, and techniques for stakeholder engagement

The stakeholder groups and their levels of influence, cross-referenced with their interests in the project, guides the type and frequency of engagement activities for each group. The color-coded interest and influence matrix provided below helps identify where to focus stakeholder engagement efforts as it outlines key stakeholder groups and categories, their needs and interests as well as influence in the project.

Table 4: Influence and Interest Matrix

The table below identifies the key stakeholder groups and categories, the nature of their interest in the project and their level of interest in and influence over the project and is based on the color code in the matrix below.

Table: Influence and interest matrix

Level of Influence				
High	Involve/engage	Involve/Engage	Partner	
Medium	Inform	Consult	Consult	
Low	Inform	Inform	Consult	
	Low	Medium	High	Level of Interest

Stakeholder Group	Nature of interest	Level of interest	Level of Influence	Level of engagement
Consumers (households, citizens, businesses)	Reliable power supply, lower technical losses, and improved grid efficiency	High	High	Consult
Public institutions (schools, healthcare, emergency services)	Reliable power supply critical for service continuity	High	Medium	Inform
Local Authorities (Municipal Representatives)	Ensure local development, minimize disruption, and improve infrastructure	High	High	Consult

National and Local Media Channels	Information dissemination, public perception, and awareness	Medium	Medium	Inform
The World Bank	Financier, Loan supervision, Project oversight, compliance with Environmental and Social Standards	High	High	Partner
Ministry of Finance	Loan supervision, Financial management	High	High	Partner
Implementing agencies (MoE, CEDIS)	Implementing agency, project success, timely completion, adherence to budgets, operational efficiency, grid management	High	High	Partner
Implementing Agencies and Implementing agencies	Day-to-day management, project success, timely completion, adherence to budgets	High	High	Partner
Stakeholders in Montenegro's Energy Sector (EPCG, CGES, REGAGEN)	Sectoral coordination, regulatory compliance, and operational standards	Medium	Medium	Inform
Contractors, OHS Specialist, Supervision Engineer, Designer	Successful completion of designs, works, adherence to safety and quality standards.	High	Medium	Partner
Elder Persons	Accessibility and reliable power critical for assistive devices and daily living	High	Low	Consult
Persons with disabilities	Accessibility and reliable power critical for assistive devices and daily living	High	Low	Inform giving special attention

Different engagement methods are proposed and cover different stakeholder needs, interests and influence to the project as suggested in the stakeholder engagement plan below. Examples may include formal meetings, workshops, surveys but also phone and e-mail communication as well as formal press releases.

Proposed Strategy for Consultation

Different engagement methods are proposed and cover different stakeholder needs, interests and influence to the project as suggested in the stakeholder engagement plan below. Examples may include formal meetings, workshops, surveys but also phone and e-mail communication as well as formal press releases.

The outreach and stakeholder engagement will be gender appropriate, taking into consideration the after-hour chores of women. Targeted messaging will encourage the participation of women and highlight Project characteristics that are designed to respond to their needs and increase their access to Project benefits.

The project will carry out targeted consultations with vulnerable groups to understand concerns/needs in terms of accessing information, medical facilities and services and other challenges they face at home, at workplaces and in their communities.

Each of the proposed channels of engagement should clearly specify how feedback and suggestions can be provided by stakeholders.

Citizen/PAP perception survey and feedback: Six months after each launch meeting the PIU will conduct sample-based stakeholder satisfaction surveys to collect feedback on: i) engagement process and the quality and effectiveness of methods ii) level of inclusiveness in the engagement process, iv) quality of the communication and dialogue with the internal stakeholders (PIU, Contractor, GM etc) during construction works. The survey results will be soliciting feedback on the effectiveness of the project activities that will be used for communication level improvements. This will allow the PIU to identify potential design issues. The survey data will be disaggregated by age, gender and location). Survey results with proposed corrective measures will be published on Ministry website and discussed at consultation meetings.

Stakeholder engagement plan

Construction phase (replacement of switchgear and transformers, installation of smart metering devices)

STAKEHOLDER ENGAGEMENT PLAN
Construction / renovation phase Timeframe: *2025/2030*
Objective: Consult & inform key stakeholders to provide meaningful & constructive feedback on project implementation Activate coordination mechanisms to assure functioning of project GRM
Activities of construction phase: Mobilize/implement communications activities Collect, systematize and prepare responses on feedback received Supervise adequate implementation and support for each location and GRMs
Inputs for construction phase: Communication tools: PPTs, leaflets, information notices on sites, bulletin boards, media / social media announcement Workers GRM tools Summary of Feedback received during phase
Outputs Stakeholders informed and engaged in sub-project implementation Updating/revision of plans for replacement of equipment due to possible problems GRM tools for workers is functional Monthly reports from construction companies (replacing equipment) inform semi-annual project reports

Stakeholder engagement program for the construction phase (replacement of switchgear and transformers, installation of smart metering devices)

Stakeholders	Benefits	Risks	Key messages and topics	Areas where Feedback is sought	Methods for Engagement	Frequency and responsibility
Consumers (households, citizens, businesses)	- Reliable power supply, - reduced outages, - improved grid efficiency, - potential for lower electricity costs due to reduced technical losses and the installation of smart meters	- Disruption to daily life during planned power outages including potential loss of heating/cooling, disruption of household appliances, and communication systems	- Advance notice of outages, duration, and timing; steps being taken to minimize disruption; long-term benefits of the upgrades - Clear information on the installation process of smart meters - Presentation of project, timeframes - Presentation of GRM	- Concerns about the timing of outages, suggestions for minimizing inconvenience, specific needs of vulnerable consumers. - Interest/Concerns related to project Grievances and level of satisfaction regarding grievance resolution	- Usual CEDIS communication channels for power outages (notification to all media outlets 48 hours in advance and on CEDIS website, daily updates on CEDIS website and social media page) - Informational brochures that include project GRM - Direct phone and e-mail communication, - Use of informational brochure on	Frequency: - 48 hours before planned outages (CEDIS web site and media outlets) - regular updates during outages (CEDIS web site, CEDIS social media pages) - Phone line at disposal of consumers and vulnerable groups before, during and after outage - Mail communication to consumers and vulnerable group (if addresses available), 48 hours before outage with Project GRM and usugal CEDIS complaint mechanism)

					smart metering systems and GRM in accessible formats	- 2 weeks' notification of smart metering system installations (including through leaflets)Responsibility PIU and Implementing agency
Public institutions (schools, healthcare, emergency services)	- Enhanced infrastructure reliability, reduced risk of unplanned outages, better power quality.	- disruption to critical services, including healthcare operations (e.g., labs, medical records), emergency response, and educational	- Importance of planned upgrades for long-term service reliability; detailed outage schedules and contingency plans;	- Critical service continuity needs, timing preferences for outages, specific concerns related to power-dependent operations. - Interest/Concerns related to	- Presentation materials - E-mail - Phone - Usual CEDIS communication channels for power outages - Informational brochures that	Frequency: - Intensive communication two weeks before and during outages. - regular updates during outages. Responsibility

		activities, especially during extreme weather conditions.	coordination with emergency services to ensure continuity. - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	project Grievances and level of satisfaction regarding grievance resolution	include project GRM - Informational brochure on smart metering systems (for selected consumers)	- PIU and Implementing agency
Local authorities (municipal representatives)	- Improved infrastructure supporting local development,	- Public backlash due to service disruptions, increased traffic congestion from non-functioning traffic lights, potential accidents.	- Coordination on minimizing disruption, ensuring safety during outages, and managing public communication - Support for the distribution of informational brochures / leaflets (on Project, GRM,	- Local traffic management during outages, timing of outages to minimize public disruption, coordination with public safety services. - Interest/Concerns related to project Grievances and level of satisfaction regarding	- Meetings - Presentation materials - E-mail - Phone	Frequency: - Intensive communication two weeks before and during outages. - regular updates during outages Responsibility - PIU and Implementing agency

			Smart metering devices) - Presentation of project, timeframes, WBs ESF and related tools - Presentation of GRM	grievance resolution		
National and local media channels	- Accurate and timely dissemination of information and enhanced public awareness.	Negative media coverage if public dissatisfaction with outages arises	- Project benefits, outage schedules, steps taken to mitigate impacts, positive outcomes of the upgrades. - Presentation of GRM	- Public sentiment, key issues for public communication, suggestions for media campaigns.	- Meetings - Presentation materials - Press releases, media briefings - Real-time updates during outages.	Frequency: Frequency: - Intensive communication two weeks before and during outages. - regular updates during outages. Responsibility - PIU and Implementing agency
Stakeholders in Montenegro's energy sector (EPCG, CGES, REGAGEN)	- Enhanced grid reliability.	- Public dissatisfaction with outage management.	- Sectoral coordination during outages, regulatory compliance, long-term	- Coordination during outages, eventual regulatory concerns	- Meetings - Presentation materials - Mail - Phone	Frequency: - once during phase Responsibility - PIU and Implementing agency

			benefits to the energy sector. - Presentation of project and GRM			
Contractors, OHS specialist, supervision engineer, designer	- gaining experience on works and equipment installation managed in line with WBs procedures, especially ESF requirements	- Safety incidents during outages, delays due to public backlash, technical challenges during installations.	- Present and control alignment with relevant legislation and ESF - Rising awareness and control functioning of project GRM and worker GRM - Time plans	- Collecting feedback from project and worker GRM	- Regular Meetings - Mail - Phone	Frequency: - once during phase Responsibility - PIU and Implementing agency
Elderly persons	- Reliable power supply - reduced risk of health complications due to uninterrupted use of medical devices,	- Health risks due to reliance on electric-powered medical devices - increased vulnerability during power outages, especially in	- Importance of planned infrastructure upgrades for long-term benefits. - Advance notice of outages and their expected duration.	- Preferences for timing of outages to minimize impact. - Specific health and safety needs during outages. - Grievances and level of satisfaction	- Usual CEDIS communication channels for power outages (notification to all media outlets 48 hours in advance and on CEDIS website,	Frequency: - 48 hours before planned outages (CEDIS web site and media outlelts) - regular updates during outages (CEDIS web site, CEDIS social media pages)

	- minimized disruption to daily life during planned outages.	extreme temperatures - difficulties in mobility if elevators or powered stair lifts are non-operational. - lower digital literacy may hinder access to real-time outage information and emergency services.	- Encouragement for family members, neighbors, and friends to support elderly individuals during outages through CEDIS communication channels. - Assurance that the project will avoid work during extreme temperature events and will schedule work during periods of lower demand to minimize disruption. - Presentation of GRM	regarding grievance resolution	daily updates on CEDIS website and social media page) - CEDIS communication channels and messages modified to encourage local community to inform the elderly about the planned power outage and to check on check them during outages - Press releases - Use of notices, signage and information materials in accessible formats for elderly (i.e., large print)	- Phone line at disposal of consumers and vulnerable groups before, during and after outage - Mail communication to consumers and vulnerable group (if addresses available), 48 hours before outage with Project GRM and usugal CEDIS complaint mechanism) 2 weeks' notification of smart metering system installations (including through leaflets) Responsibility - PIU and Implementing agency

Persons with disabilities	- Continuous power supply for essential medical and mobility devices, minimized disruption to daily life	- Health risks from the interruption of electrically powered medical equipment (e.g., ventilators, mobility aids), - increased challenges in mobility if elevators and powered stair lifts are non-operational - difficulties in navigating dark spaces	- Importance of planned infrastructure upgrades for long-term benefits. - Advance notice of outages and their expected duration. - Encouragement for family members, neighbors, and friends to support persons with disabilities during outages through CEDIS communication channels. - Assurance that the project will avoid work during extreme temperature events and will schedule work	- Preferences for timing of outages to minimize impact. - Specific health and safety needs during outages. - Grievances and level of satisfaction regarding grievance resolution	- Usual CEDIS communication channels for power outages (notification to all media outlets 48 hours in advance and on CEDIS website, daily updates on CEDIS website and social media page) - CEDIS communication channels and messages modified to encourage local community to inform persons with disabilities about the planned power outage and to check on them during outages	Frequency: - 48 hours before planned outages (CEDIS website and media outlets) - regular updates during outages (CEDIS web site, CEDIS social media pages) - Phone line at disposal of consumers and vulnerable groups before, during and after outage Mail communication to consumers and vulnerable group (if addresses available), 48 hours before outage with Project GRM and usugal CEDIS complaint mechanism) - 2 weeks' notification of smart metering system installations

			during periods of lower demand to minimize disruption. - Presentation of GRM		- Press releases - Use of notices, signage and information materials in accessible formats for persons with disabilities (i.e., large print) - Direct phone and e-mail communication, use of informational brochure on smart metering systems and GRM in accessible formats (for selected consumers)	(including through leaflets) Responsibility PIU and Implementing agency of PIU

Proposed strategy for disclosure :
All ESF draft tools and documents will be disclosed before Project Appraisal takes place. ESF documents (i.e. ESMF, ESCP, LMP, RPF and Project level SEP) will be disclosed electronically and will be available in English version. The documents will be available for public consultation for at least 15 days on the websites of the Implementing Agencies:

- https:// energetska-efikasnost.me/
- https://cedis.me

Notices inviting the public to consultations swill be posted on the websites of the Implementing Agencies and disseminated through all relevant digital platforms and at least one reputable print media outlet. The notices will be issued at least 15 days prior to the scheduled consultation event, allowing the public sufficient time to review the documents before the meeting. Notices will define methods for stakeholders to submit their comments, both in person and online and will be adapted to be easily consulted by persons with disabilities. Implementing Agencies will organize consultation events in premises that are adapted and accessible by persons with disabilities. Detailed reports of the consultations, including how comments were addressed, will be well-documented and added as Annexes to the SEP that will then be re-disclosed on the websites of the Implementing Agencies. Institutional stakeholders (i.e. representatives of municipalities, line ministries, energy sector stakeholders), experts, NGOs and associations representing stakeholders will be engaged through e-mail communication with the ESF tools attached.

Eventual significant up-dates of ESF documents during project implementation, as well as additional ESF tools developed specifically for selected locations (such as ESMPs, ESMP Checklists) will be disclosed and open for public consultation again for at least 15 days. Information on public engagement activities undertaken by the Project will be conveyed to the stakeholders through short annual reports published on Implementing Agencies web sites.

Printed copies will be made available at the CEDIS premises during public consultation.

The Project will be announced through Radio, TV, written and electronic media as well as all available official social media accounts and web pages.
During Project Implementation any of the documents disclosed during preparation, if updated shall be re-disclosed and public consultations held.
Site specific management instruments developed to manage environmental and social risk and impacts such as Environmental and Social Management Plans (ESMPs), will be disclosed.

Contractors' documents related to management of environmental and social risks (these may include traffic Management Plan, Emergency preparedness and response plans, Codes of Conduct for Employees and Contracted workers etc) shall be made available at Contractors website. Information on timing of project activities and related information shall be made public via various media, newspaper and radio at least 2 weeks prior to actual execution.

During the Project development and construction phase, the PIU members responsible for the implementation and monitoring of ESF tools will will prepare monthly reports on E&S performance for the PIU and the WB which will include an update on implementation of the stakeholder engagement plan. Monthly reports will be used to develop quarterly reports. The quarterly reports will be disclosed on the Project website and made available at the level of project.

Stakeholder expansion

The list of stakeholders can be revisited / updated during project implementation, especially if new locations for renovation are selected. The activity can be carried out within the regular Monitoring & Evaluation (M&E) of the Project. The potential tool to expand lists of stakeholder is found below.

Table 5: Stakeholder expansion tool

STAKEHOLDER EXPANSION AND UPDATE NEED QUESTIONNAIRE	
□ YES □ NO If No the Project needs to expand the Stakeholder list	Is the current list focused on relevant stakeholders who are important to our current and future efforts as well as project locations?
□ Yes □ No If No the needs assessment should be conducted and Stakeholder list expanded / updated	Do we have a good understanding of what are stakeholder needs and concerns, what they may want, whether they would be interested in engaging with the Project, and why?
□ Yes □ No If No the needs assessment should be conducted and Stakeholder list expanded / updated	Does the current engagement strategy adequately covers vulnerable groups?

1.17. Resources and Responsibilities for implementing stakeholder engagement activities

Management functions and responsibilities

The development of project SEP, its implementation, the disclosure and consultation activities, as well as functioning of GRM will be responsibility of the PIU established by the Implementing Agency for Component 2, CEDIS. To ensure successful SEP implementation, as well as implementation of the abovementioned activities, the PIU will engage a Project coordinator for the duration of the project that will regularly monitor on the implementation of the SEP and report to the WB. All stakeholder engagement activities mentioned in table above will be financed by the budget of the implementing agencies and/or project funds.

Resources

The budget for this SEP is included in Component 3: Technical Assistance and Project Implementation Support of the project.

Tentative budget categories and amounts for the implementation of stakeholder engagement activities can be find below.

Budget Category	Quantity	Unit Costs	Times/Years	Total Costs	Remarks
1. Estimated staff salaries and related expenses					
1b. Travel costs for Project coordinator					

2. Trainings					
3a. Training on social/environmental issues for PIU, designer, contractor, OHS and supervising engineer staff					
4. Printed materials					
5a. Brochures / leaflets with project information and GRM, explanation of smart metering systems					
5. Grievance Mechanism					
6a. Training on GRM for PIU, designer, OHS, contractor and supervising engineer staff					
TOTAL STAKEHOLDER ENGAGEMENT BUDGET:					

The stakeholder engagement activities will be documented primarily through Minutes of Meetings, Grievance logs and press clippings.

1.18. Grievance Mechanism

The main objective of a GRM is to assist to resolve complaints and grievances in a timely, effective, and efficient manner that satisfies all parties involved.

Description of Project GRM

A Grievance Redress Mechanism (GRM) is a process for receiving, evaluating, and addressing project-related complaints, feedback, questions, and suggestions from citizens and affected communities at the level of the project.

A well-designed grievance mechanism is accessible, effective, easy, understandable and without costs to the complainant. The mechanism focuses not only on receiving and recording complaints but also on resolving them. While feedback should be handled at the level closest to the complaint, all complaints should be registered and will follow the required procedures. All grievances lodged, regardless of the project phase or activity being implemented, should follow one single mechanism.

Considering the above, the GRM is intended to serve as a mechanism to:

- Allow for the identification and impartial, timely and effective resolution of issues affecting the project.
- Strengthen accountability to beneficiaries, including project-affected people, and provide channels for project stakeholders and citizens at all levels to provide feedback and raise concerns.

Having an effective GRM in place will also serve the objectives of reducing conflicts and risks such as external interference, corruption, social exclusion or mismanagement; improving the quality of project activities and results; and serving as an important feedback and learning mechanism for project

management regarding the strengths and weaknesses of project procedures and implementation processes.

During the construction phase (replacement of switchgear and transformers, installation of smart metering devices), a representative of the contractor (i.e. site manager, team leader of the team responsible for the installation of smart metering devices) will be responsible for addressing grievances of citizens and stakeholders. Contact information to this person will be made available to the public at all locations where the works (including installation switch gear, transformations and installation of smart metering devices) are being performed. Contracts with the contractor shall specify that all complaints received should be communicated to Project coordinator, who will add these complaints to the grievance log. Furthermore, during this phase complaints should be communicated to the supervising engineer, if they will be engaged in the implementation of the phase according to relevant legislation. Moreover, contracts shall specify the obligation of the advisor (i.e. designer / engineer developing technical projects), supervising engineer and contractor to participate in eventual training activities on WBs ESF and GRMs that are organized and/or selected by the PIU.

Furthermore, during this phase informational brochure / leaflets on the project and project GRM and on smart metering systems will be shared to citizens in main public spaces and with the support of stakeholders such as municipalities.

Although the Project's Sexual Exploitation and Abuse (SEA)/Sexual Harassment (SH) risk was assessed as low (because of (i) the expected local employment and (ii) expected low number of workers on construction sites) the GM will, on a precautionary base, be enabled to recognize SEA/SH grievances.

The grievance redress mechanism is organized as two-level mechanism, while the second level of appeal shall occur, if the complainant is unhappy with the result of the grievance resolution process. It will be possible to bring grievances to the attention of responsible persons personally, verbally by telephone, or in writing through e-mail, post, fax or personal delivery.

Project-affected persons will have the possibility to voice their complaints to the PIU Project coordinator:

Name and Surname of Project coordinator
address
e-mail address
phone number
fax number

Grievances will be systematically acknowledged: an interim reply will be sent within 3 working days of receipt and provide the complainant with basic information about next steps. This will be followed by an investigation stage, during which the Project coordinator of the PIU will try to understand the issue from the perspective of the complainant and what action may be required, examine factual evidence and circumstances, carry out complementary research, interview parties involved and confer with relevant stakeholders as appropriate. Once investigated, and depending upon the severity and type of grievance, a provisional decision shall be discussed with the complainant in order to find a satisfactory solution. Unilateral announcements shall be an exception. If an agreement is found, it should be specific and time-bound and will be communicated to the complainant in writing within one month of the grievance receipt. The grievance will be considered "closed" after the implementation of the resolution has been verified.

Even when an agreement is not reached, or the grievance was rejected (for example because it did not fall under the scope of the project), actions undertaken, status of the case (e.g. pending due to investigation, closed) and results achieved will be systematically documented.

The Project Coordinator shall keep a grievance register log that will record the following information at minimum:

- Name of complainant (if treated as non-confidential)
- Location and address of Complainant (if available),
- Location concerned by the grievance;
- Date the grievance was received;
- Date of receipt acknowledgement returned to the complainant;
- Channel through which the grievance was received;
- Brief description of grievance;
- Classification/type of grievance (level of impact on the project);
- Description of actions taken (investigation, corrective measures)
- Current status of grievance;
- Date of resolution and closure
- Feedback from Complainant on level of satisfaction

In order to monitor the efficacy of the GRM, the following indicators may be used: (i) number of grievances received/resolved; (ii) number of grievances acknowledged within the 3-day timeframe; (iii) number of grievances resolved within one month from receipt.

Once all possible means to resolve the complaint have been proposed and if the complainant is still not satisfied, then they should be advised of their right to legal recourse.

Workers GRM

A grievance mechanism will be provided for all direct workers and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed of the grievance mechanism at the time of recruitment and the measures put in place to protect them against reprisal for its use. Measure will be put in place to make the grievance mechanism easily accessible to all such project workers. Project workers should be able to raise concerns regarding unsafe or unhealthy work situations through the grievance mechanism.

Contracts with contractors and advisors shall specify the obligation to inform workers on Workers GRM and to make relevant contacts available, especially in case of civil works in the selected locations.

The workers GRM will include:

- A channel to receive grievances such as comment/complaint form, suggestion boxes, email.
- Stipulated timeframes to respond to grievances.
- A register to record and track the timely resolution of grievances.
- A responsible person/section/committee to receive, record and track resolution of grievances.

The PIU will review the records and report on the worker's grievances, response time and resolution status in a semi-annual report to the WB. The grievance mechanism will not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

The point of contact regarding project and worker's grievance management are:

Name and Surname of Project coordinator
address
e-mail address
phone number
fax number

Considering that The CEDIS complaint resolution process is regulated, detailed and established (known) by the majority of consumers, it can be foreseen that a certain number of grievances related to the Project will be received through the CEDIS complaint mechanism described below.

Other mechanisms that can be used to submit complain related to the project are those established by the WB (also described below).

CEDIS complaint mechanism practice and integration with the Component 2 GRM

The CEDIS complaint resolution process is thoroughly regulated by the document titled "Procedure on Receiving and Resolving User Complaints, no. ID 033-REG, version 2 of 03.12.2020." This document establishes a structured process for recording and resolving complaints using the Bitrix IT program, ensuring that all complaints are handled systematically. This detailed procedure ensures that all user complaints are handled efficiently, with specific responsibilities and deadlines clearly defined for each phase of the process.

Complaints can be submitted in several ways:

- Regular mail: complaints can be sent to the Central Archive of CEDIS, located at Ivana Milutinović Street no. 12, Podgorica.
- Email: complaints can be submitted via email to korisnik@cedis.me.
- Online: an online submission form is available on the CEDIS website.
- In-person: complaints can also be lodged directly with the end-user relations officer in municipalities where CEDIS has offices for end-user interaction.

Complaints received before 2:00 p.m. are processed the same day and forwarded to the Department for relations with the regulator, state institutions and users of the distribution system (REG). Complaints received after 2:00 p.m. are processed the next business day. Each complaint is logged in the Bitrix system, where it is assigned a unique number and directed to the appropriate phase under REG's jurisdiction. The REG officer responsible for the initial phase must verify the request and forward it to the relevant sector for further explanation on the same day. REG maintains records of all user complaints. Consumers submitting complaints in person at CEDIS offices receive a confirmation of receipt. Each complaint is registered in a special record book by the officer responsible for records and document handling.

Complaint resolution stages and deadlines:

- Phase 1: the Archive, under the Sector for Human Resources, General Affairs, and Corporate Communications, is required to process all requests received by 2:00 p.m. on the same day.

- Phase 2: REG processes complaints immediately upon receipt. REG must forward the complaint to the relevant sector for an explanation on the same day.
- Standard complaints: REG and all other sectors involved in complaint resolution have a maximum of 7 days to respond, provided the complaint does not involve voltage quality issues.
- Voltage quality complaints: complaints concerning voltage quality have a longer processing time, with the competent sector required to provide a statement within 25 days from the date of complaint submission.
- Final response deadlines: all sectors, including the archive, must provide a response to the user within 15 days for general complaints or 30 days if the complaint relates to voltage quality.

Intersectoral Cooperation

In cases where resolving a complaint requires additional information, evidence, or expert opinions from other organizational units, REG will issue an inquiry on the same day the complaint is received. The inquiry is sent to the appropriate unit and includes the submitter's details and the complaint's subject, along with a scanned copy of the complaint. The relevant organizational units are required to respond within 7 days, providing a clear and comprehensive statement, evidence, or expert opinion. The response must be submitted through the Bitrix system. Based on the gathered information, REG prepares a response to the user within 3 days of receiving the necessary details.

If the response from the competent organizational unit includes planned activities to address the complaint, the unit must inform REG of the actions taken within 2 days of their implementation. The total time for providing a final response to the user must not exceed 15 days, except for voltage quality-related complaints, where the response time is extended to 30 days. In cases involving voltage quality, the competent unit must, within 25 days of REG's receipt of the complaint, submit a statement confirming whether the user's request is valid, specifying any voltage deviations and the timeline for rectifying them. REG then provides the user with a response based on these findings.

Evidencing Project grievances within the CEDIS complaint mechanism

Given that the CEDIS complaint resolution process is well-regulated, detailed, and familiar to most consumers, it is anticipated that some grievances related to the Project will be submitted through the existing CEDIS complaint mechanism. Efforts will be made to identify grievances related to the Project that are submitted through the regular CEDIS complaint mechanism. Special attention will be given to distinguishing these project-specific complaints to ensure they are appropriately addressed and tracked, despite being received through the established and familiar CEDIS channels.

To effectively identify grievances related to the Project that are received through the regular CEDIS complaint mechanism, the following steps will be implemented:

- Regular briefings of the staff handling complaints (REG) on the specifics and phases of the project. This will help identify and manually tag relevant complaints. This will be done through updates to the staff on keywords and issues that may be linked to the Project. For example, complaints mentioning specific substations and locations, planned outages, or locations with installations of smart metering devices could indicate a project-related issue.
- PIU members will periodically review complaints if needed (i.e. if mayor power outage connected to the Project occur) in order to flag complaints that appear to be related to the Project for further attention and monitoring within the CEDIS and Project GRM.

- Complaints received through CEDIS mechanism can be flagged in the semi-annual reports to the World Bank (WB) to track project-specific issues, response times, and resolutions.

These steps will help ensure that project-related grievances are accurately identified and managed, even when they are submitted through the regular CEDIS complaint mechanism.

WB's complaint mechanisms practice

Project stakeholders and citizens can also submit complaints regarding the project activities through the World Bank Grievance Redress Service (GRS). Communities and individuals who believe that they are adversely affected by a World Bank-supported project may submit complaints to existing project-level grievance-redress mechanism or to the WB's (GRS). The GRS ensures that complaints received are promptly reviewed to address project-related concerns. Project-affected communities and individuals may submit their complaint to the WB's independent Inspection Panel (IP), which determines whether harm occurred, or could occur, because of the WB noncompliance with its policies and procedures.

Complaints may be submitted at any time after concerns have been brought directly to the WB's attention, and Bank Management (BM) has been given an opportunity to respond. For information on how to submit complaints to the WB's GRS, please visit: http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service.

For information on how to submit complaints to the WB's Inspection Panel, please visit www.inspectionpanel.org.

The World Bank and the Borrower and Implementing Agencies do not tolerate reprisals and retaliation against project stakeholders who share their views about Bank-financed projects.

1.19. Monitoring and Reporting

Summary of how SEP implementation will be monitored and reported

Reporting is an integral part of the monitoring process as it provides valuable insight into project processes as well as decision-making information to the Project Implementation Unit (PIU) and WB teams. Consequently, it enables timely interventions and adjustment of corrective measures. Unless differently agreed, the PIU will report on the implementation of ESF tools including SEP in regular progress reports and upon request of WB Environmental and Social Specialists. Stakeholders will be kept informed on project environmental and social performance on the implementation of project SEP and GRM, as well as on the project's overall implementation progress through short reports published on the websites of the Implementing Agencies: Ministry of Energy and CEDIS.

At the level of each selected location particular focus of monitoring and reporting will be given in the situation in which power outages occur.

During implementation of works regular monthly meetings are foreseen among "construction" stakeholders (i.e. contractors, supervising engineer, construction project manager (where relevant), designer; occupational health and safety (OHS) specialist) and monthly meetings with PIU and Implementing Agencies representatives. Contractual obligation of the supervising engineer (if needed according to relevant national legislation) will include to write minutes from the held meetings and distribute it to all stakeholders for confirmation. The monitoring of implementation implies constant

communication among contractors, supervising engineer, engineer/designer; occupational health and safety (OHS) specialist, the PIU and Implementing Agencies representatives. Monitoring also includes control of reports submitted by the Supervising Engineer and Contractor and on-the-spot checks. PIU will conduct on-the-spot checks in all stages of the project (ad hoc or related to the payments). During the implementation of the contract, it is possible to hold additional ad hoc meetings (regardless of the party organizing it) at which the PIU is required to participate depending on the assessment, to monitor the implementation and to resolve possible difficulties related to the implementation of the contract.

More particularly, the contractor and the supervising engineer will report on relevant ESF tools to the PIU, monthly. In the case of significant non-compliance, the PIU will, without delay, inform the WB Environmental and Social Specialists of the nature, size, and scope of the impact. Unless differently agreed with the WB Environmental and Social Specialists, the PIU will report on implementation compliance with ESF tools in regular annual progress reports (when reporting on SEP) and upon request of WB Environmental and Social Specialists. In the case the Contractor and/or Supervising Engineer breached the measures defined in relevant ESF tools and/or applicable national regulation, and incompliance is confirmed, the PIU will propose corrective measures as well as the timeframe (deadline) for the implementation. If the corrective measures are not implemented and compliance criteria does not met within the defined timeframe, the PIU can consider withholding the payment until the Contractor / Advisor responses to these requirements and requests and compliance is accomplished and re-confirmed (either through a location inspection or desk review).

Reporting back to stakeholder groups

The SEP will be periodically revised and updated as necessary in the course of project implementation. Semi-annual summaries and internal reports on public grievances, enquiries, and related incidents, together with the status of implementation of associated corrective/preventive actions, will be collated by responsible staff and referred to the senior management of the project.

The PIU will report on the implementation of ESF tools including SEP in regular progress reports and upon request of WB Environmental and Social Specialists. Information on public engagement activities undertaken by the Project will be conveyed to the stakeholders through short annual reports published on Implementing Agencies web sites.

1.20. Annexes

Annex I Report from stakeholder consultation during project preparation

TO BE INSERTED UPON STAKEHOLDER CONSULTATION

Annex II Public grievance registration form

GRIEVANCE REGISTRATION FORM	
MONTENEGRO ENERGY SECTOR DECARBONIZATION PROJECT (MESDP) Montenegro Electric Distribution System - CEDIS	
Note: If you prefer you can remain anonymous	First name _____ Last name _____ □ I wish to raise my grievance anonymously □ I request not to disclose my identity without my consent
Contact Information: Please mark how you would like to be contacted (mail, phone, e-mail)	□ By Post on the following address: _____ □ By Telephone: _____ □ By E-mail _____ □ I don't wish to be contacted
Preferred Language for communication	□ Montenegrin □ Other please specify
Description of Incident or Grievance:	
Date of Incident/ Grievance	
What would you like to see happen to resolve the problem?	
Signature: _____ (not required in case of anonymous complaints) **Date: _____**	
Please return this form to: *Name and Surname of Project coordinator* *address* *e-mail address* *phone number* *fax number*	

Annex III CEDIS Grievance registration form (on line)

COMPLAINT FORM

NAME
SURNAME
JMBG
COUNTER NUMBER
SUBSCRIPTION NUMBE

MAIL RECEIVING ADDRESS
ADDRESS REGARDING THE LOCATION WITH WHICH THE COMPLAINT IS SUBMITTED
PHONE
E-MAIL

REASON FOR COMPLAINTS

- Displacement 0.4
- Displacement of 10 and 35
- Maintenance of pole replacements
- Maintenance of cable replacements
- Maintenance and repair of cables
- Removal of vegetation
- Voltage quality
- Impact on the environment
- Another type of request
- Displacement of meters
- Objection based on unauthorized electricity consumption
- Quality of supply

REMARKS

REASONS FOR COMPLAINTS (IF IT IS NOT IN THE OPTIONS)

ATTACHMENTS