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Montenegro: Construction of Bar-Boljare Highway - Environmental and Social Impact Assessment

Gap Analysis & Disclosure Pack section Mateševo – Andrijevisa

CONSULTATION REPORT

Meetings held with local communities impacted by the Mateševo-Andrijevisa Highway Design held
between July and December 2024

Key takeaways and most significant statements and insights shared by stakeholders from local
communities of Mateševo, Bare Kraljske, Kralje, Gnjili Potok, Sjenozeta, Trešnjevik, Slatina, Prisoja,
Zabrđe, Trešnjevo and Andrijevisa

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1 Introduction and consultation background

The Bar-Boljare Highway (BBH) in its length of 168 km, which the 23.5 km section Matešev –Andrijevića is a part of, forms the Trans European Motorway (TEM) branch route through Montenegro. The intention of Montenegro to construct the Bar – Boljare Highway was initiated back in 2001 by the Parliamentary decision to proceed with the development of the Spatial Plan (“Official Gazette of MNE” no. 45/01). The Spatial Plan of Montenegro up to 2020 was subsequently adopted in 2008 (“Official Gazette of MNE” no. 24/2008) reserving space by defining a dedicated corridor for the Highway BBH. The objective of defining the corridor was to safeguard the space from other spatial demands and use (Spatial Plan, Pg.133). On October 19, 2023 the Government of MNE has determined the Draft Spatial plan of Montenegro up to the year 2040. After the disclosure, public insight, and consultation period, the final draft of the Spatial Plan was adopted and disclosed on January 29, 2024 by the Ministry of Spatial Planning, Urbanism and State Property. The Strategy of transport development in Montenegro (2019-2035) has included the completion of the Section “Matešev – Andrijevića” part of the Bar - Boljare Highway into the unified list of priority infrastructure projects.

The activities undertaken in Project preparation can be observed through **two consecutive development phases**, without overlapping sequences.

The **first phase**, started with the General Design (Louis Berger SAS-Paris, Simm Engineering –Podgorica) in 2008, when three alternative solutions of the alignment were examined. The Design activities continued in 2018 under the Technical assistance services (TA) supported through a Western Balkans Investment Framework (WBIF)¹ Grant.

The **second phase** started in mid-2024, and has been mainly determined by the intention of the Government of Montenegro to request EBRD to financially support the construction of Matešev – Andrijevića, which required assessment of compliance of project activities with, inter alia, the Environmental and Social Policy of EBRD (2019) and the applicable Performance Requirements and consequently (2) the decision of MONTEPUT to explore viable alternatives in the endeavour to respond to complaints raised by three out of eight settlements.

This Consultation Report presents the summary of consultations and meetings undertaken with local communities impacted during the **second phase** of the project in course of the Due Diligence and development of the Environmental and Social Impact Assessment (ESIA).

¹ The Western Balkans Investment Framework is an EU initiative, uniting regional beneficiaries, international financial institutions, and bilateral donors to enhance the European perspective of the Western Balkans. Due to its collaborative nature in line with the ‘Team Europe’ approach, the WBIF has been identified as the main vehicle for the implementation of the ambitious Economic and Investment Plan for the Western Balkans.

From July to September 2024, two set of public meetings were organized with citizens from impacted local communities. The first set (July 23rd and 24th, 2024 in Bare Kraljske, Kralje and Slatina) was under the organization of the ESIA Consultant with the objective to collect data on the perception of the route, assess the environmental and social impacts attributable to the route, assess the past engagement and information sharing process. The second set of meetings was organized by MONTEPUT in response to concerns identified during the July 2024 meeting, which highlighted unresolved issues related to the highway route. To address these concerns and comply with EBRD Performance Requirements, MONTEPUT explored an alternative route, changing the alignment from Tunnel Tresnjevik to Andrijevisa. This new route was publicly presented to all impacted communities: in Andrijevisa on September 4th, 2024, in Kralje (for communities of Gnjili Potok, Sjenozeta, Trešnjevik, and Kralje) on September 18th, 2024, on September 19th, 2024 in Slatina (for communities Slatina, Zabrdje, and Tresnjevo) and on September 27th in Bare Kraljske and Mateševo for communities of Bare Kraljske, Mateševo and Sunga.

This consultation report summarizes the above meetings:

- **July 23, 2024, meeting with the local community Bare Kraljske.**

Participants reported that, as of the meeting date, there had been no meaningful consultations or presentations regarding the proposed route alignment. Concerns were raised about a lack of transparency and failure to disclose relevant information to enable effective stakeholder consultations. The community shared how this, but also Mateševo were adverse impacted from contractors off site activities during the construction of Smokovac - Mateševo (another section of the BBH preceding the Section Mateševo – Andrijevisa). Road safety, damages to local roads, speeding vehicle, and overloaded trucks, were highlighted, as were drainage solutions, impacts on community connectivity, and land restrictions imposed after the highway's construction.

Participants reported that the administratively expropriation process had begun, and questions were raised about why this process started based on the Preliminary Design. The meeting also expressed dissatisfaction with the activities preceding asset valuation, particularly the lack of prior communication. No negotiated settlements, land acquisitions, or resettlements had taken place to date.

During the meetings the participants emphasized that in 2022 they had submitted a list of seven requests (as Joint conclusions from the community meeting held on September 10, 2022) to various governmental institutions, including MONTEPUT and the line Ministry. However, no feedback was received. MONTEPUT only responded to one out of 7 requests— request for an additional interchange—declining it on the grounds that it was not technically feasible and that the distance between two consecutive interchanges has followed the applicable national design standards in addition that it was not defined in the Spatial Plan of Montenegro, prompting the community to request amendments to the Plan. This initiative was supported by the Municipality of Kolašin through a formal decision by the Municipal Assembly.

The community welcomed the meeting with the Due Diligence Consultants, assessing the initiative as a positive step in improving communication with MONTEPUT and other government stakeholders. They also appreciated receiving information about the planned Project-specific Grievance Mechanism. It was decided during the meeting that formal communication and engagement should be directed to the elected representative of the local community, the President of the local community.

■ **July 23, 2024, meeting with the President of the Local Community office and citizens from Slatina**

During the meeting, the importance of the highway was not questioned. The President shared the citizens expectations that the construction of the highway would encourage younger generations to stay in the region and even return to resettle there. However, they emphasized the need for the route to be reassessed and possibly modified to minimize, and where possible, avoid the expropriation of properties and residential structures. The primary goal of changing the alignment would be to protect properties and allow landowners (citizens) to continue living and working on their land. One opinion shared was that individuals who do not live in the settlement, but own land, see the land acquisition as an economic opportunity. There was consensus that authorities need to change the way they engage with citizens, with a call for more frequent and structured communication with the local population.

■ **July 24, 2024, meeting with citizens from the settlement Kralje.**

In advance of the meeting, the Due Diligence Consultants met with the President of the local community (Mjesna zajednica), who provided historical insight to the concerns from adverse impacts from the route set by the Preliminary design and actions undertaken to communicate these concerns to relevant authorities. The participants underlined that their main concern was that the alignment will bisect the settlement, infringe on the spatial and functional cohesion of the settlement and impact their well-being. It was reiterated that the focus is on social values and they are not driven by economic factors. The participants reported that they have not been engaged meaningfully in the routing of the alignment, have received no relevant information in advance, not even when it comes to expropriation. They raised these concerns with many institutional stakeholders, and appear to have been receiving assurances that these concerns will be considered seriously. The understanding from the meeting was that MONTEPUT was aware of these concerns and their seriousness. However, it was indicated that exploring alternatives would take place later, during the Detailed Design phase, once the EPC Contractor has been selected. The participants suggested that an alternative route possibly bypassing the settlement is explored. The information that a Project specific Grievance mechanism will be established was welcomed. Finally they decided, as did other communities that formal communication and engagement is channelled through their elected representative i.e. the President of the local community.

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The next **five** meetings were held after MONTEPUT explored an alternative route and scheduled these meetings to provide information and detailed presentation of the changes. All meetings had a common opening statement provided by the Director of MONTEPUT who explained why a modification to part of the Mateševo – Andrijevića route section of the Highway Bar - Boljare is being considered. Background information on the highway's financing was shared, noting that initially the section was to be funded by the Capital Investment Fund of Montenegro due to its importance for national development and urgency. This urgency led to the start of the expropriation process based on the Preliminary design. However, when the European Bank for Reconstruction and Development (EBRD) agreed to finance the project the entire project had to align with the EBRD's Environmental and Social Performance Standards. As a result, the funding shift required new criteria, particularly focusing on social impacts, to be considered in the route's assessment.

■ **September 4th, 2024, meeting with citizens from the settlement Andrijevića**

MONTEPUT presented the advantages of the new route (approximately 8.5 km long) compared to the original route such as construction cost, avoidance of intersections with the regional road, minimized physical displacement, relocation of the interchange in Slatina which minimizes adverse social impacts and livelihood loss and protects the quality of life for nearby residents. Participants were informed that public presentations regarding the proposed changes, specifically the alternative route, would be organized in each impacted local community, providing all interested citizens with an opportunity to gain a detailed understanding and express their views on the revised route.

General perception. The majority of participants expressed a positive assessment of the new route, emphasizing its significance for the development of this part of Montenegro. It was unanimously acknowledged that the new route is more advantageous for their settlements, particularly in Slatina, Gnjili Potok and Kralje. **Perception of benefits.** The revised route presents considerably fewer adverse social impacts and consequences in comparison to the original alignment outlined in the Preliminary Design. Participants emphasized that, in evaluating the route's validity, the public interest should be prioritized, particularly the avoidance of negative impacts on existing residential and public buildings in Kralje. It was also highlighted that the settlement's continued existence and quality of life should not be undermined or devastated by the highway passing through its center. **Opposing voices.** A smaller number of citizens expressed opposition to the proposed changes, as they had anticipated expropriation based on the original alignment and considered compensation for the expected land acquisition to be warranted. Dissatisfaction with the short notice for the meeting was also stated. Questions were raised whether other alternatives were analysed alongside the current one, especially considering technical and geological aspects. Specific focus of those opposing the route was that in anticipation of the expropriation investments were made to acquire replacement assets. MONTEPUT acknowledged these concerns and confirmed that no land had yet been expropriated and stated that concerns raised by those citizens who feel affected by the change in the route would be taken into consideration. Discussions will be held with these citizens to reach mutually agreeable solutions. MONTEPUT, in cooperation with the relevant state authorities, will determine acceptable forms of compensation for those who may have suffered damages and will keep the public and local communities informed on the matter. A comprehensive plan will be developed to survey citizens' opinions on the proposed compensation methods and to assess public attitudes toward the suggested solutions. It was clarified that this meeting is the first in a series of meetings in impacted local communities.

■ **September 18th, in Kralje for the communities Kralje, Gnjili Potok, Sjenožeta, Trešnjevik**

This meeting had a very affirmative tone. Participants from all four communities voiced widespread support for the alternative route. While there were also concerns raised, at the end of the meeting all present were in favour and provided support to the changed route. The President of the Local Community in Gnjili Potok reported that more than 90% are in favour of the new alignment. Many expressed gratitude that their homes were no longer at risk of demolition, which fostered a positive outlook on the future of their communities. The participants acknowledged that the new route offered better prospects for long-

term development, particularly for settlements which had been threatened by the original design. **Expropriation and perceived economic loss from avoiding land acquisition.** One group of participants whose land and homes will not be impacted by expropriation due to the changed route still supported the change assessing it as socially sustainable. In contrast, another participant who claimed to speak on behalf of a group of absent citizens reported they had acquired new land and homes in a nearby area, driven by the expectation that their properties would be expropriated under the original highway route. This purchase was made after the government declared the public interest for the expropriation in early 2024. This participant further considers that these investments need to be compensated for and suggested that this issue be brought to the attention of the relevant authorities for further resolution. MONTEPUT has acknowledged this and provided assurance that this issue will be discussed further. **Water supply and health and safety concerns.** Concerns were voiced around the importance to map chartered and uncharted springs providing water supply, the highway's proximity to certain houses, further adjustments to the route to avoid even minor disturbances to properties situated near the proposed alignment, and future construction-related disturbances, such as noise or dust, during the highway's development. **Isolation due to tunnel construction.** There were also concerns around possible isolation of homes and due to the tunnel construction since there was not direct connection to the highway. It was clarified that the interchange will be in Andrijevica while the exiting local network will be preserved and connectivity maintained.

■ **September 19th , 2024 meeting with residents of Slatina, Zabrdje, Prisoja and Trešnjevo (In Slatina)**

The overall tone was a mix of **concern and** support. Despite the vocal expression of negative perceptions stated by several participants during the meeting, which were extensively described, the majority of participants provided support to the route at the end of the meeting.

General perception. Citizens expressed differing opinions on the new route. Some supported the change, citing reduced demolition of properties, while others raised concerns about the environmental impact, the lack of prior public discussion, and potential compensation for losses incurred due to the previous route's expropriation process. Several questions were raised regarding the impact on local businesses, the process of expropriation, and the planning of the new route, including whether it had been approved by relevant authorities and whether it met all technical and environmental requirements. It argues that the process for the new route has been mishandled and requests that more government representatives and EBRD officials attend future local community meetings to address these concerns. The question was raised who's initiative it was to the change the route and that the new route impacts and destructs the industrial zone. Questions were raised if the Government has supported the change and who will bear the cost of redesign. The most vocal participant were persistent to provide written comments to the EU Commission and all national authorities. **Public participation and transparency.** There were concerns from the community about the lack of adequate public consultation and transparency throughout the decision-making process. Many felt that the change in route was not properly communicated and that their input had not been sufficiently considered. There were also questions about the involvement of key authorities, such as relevant ministries and environmental agencies, in the discussions. Some participants felt uninformed about the changes, suggesting a need for

better communication with local communities. Allegations of improper planning procedures, lack of communication with owners, and insufficient public consultation were also highlighted. The fact that many people don't reside in the area made the unaware of the meeting. **Impact on Property & Expropriation.** The expropriation process raised significant concerns, particularly regarding compensation and fairness. Some citizens were worried about the impact of the old route on their properties and the potential for additional displacement. However, others welcomed the new route, as it spared their homes from demolition, providing a more favorable outcome compared to the previous plan. There was a mixed sentiment regarding how the expropriation process was handled and what compensation would be provided. Allegations were made that the route was changed to benefit some business owners in the industrial zone, claiming the route change benefited the owner by facilitating expropriation and financial gain. Questions were raised about compensation for losses due to the construction ban along the old route, which had affected owners for five years. What could be heard is that a number of citizens already provide support to the old route when they agreed to the expropriation. The perception that more residential buildings will be impacted was stated. Opinions were provided that the new route was developed without adequate public consultation and has caused division among residents, as many had initially accepted expropriation but will no longer be affected. Request that compensation for expropriated land must be higher than what the Government paid for the preceding section Smokovac – Mateševci. **Restrictions on land.** Concerns were raised that a 5 year restriction of development was imposed when the highway corridor was set which led to economic loss. This led to the question what planning document was the new route based on. **Livelihood impacts.** Participants who have land dependent livelihood were extremely satisfied with the changed route as it avoid impact on their family business.

Environmental impacts. Some residents feared that the new route could cause more harm to the environment than the original route, particularly in terms of damage to agricultural land, water resources like the Kraštica River, and the broader ecosystem. There were specific concerns about the proximity of the route to sensitive areas and the risks of landslides. Some residents questioned whether the new route had been thoroughly assessed for its environmental consequences. **Technical & Cadastral** Questions were raised about the technical details of the new route, including its inclusion in the Spatial Plan and the cost implications. Doubts about the accuracy of the plans were raised, particularly regarding the number of buildings that would be demolished and the potential impact on local development. Authorities clarified that the new route had been thoroughly assessed using geodetic and cadastral data, ensuring that it met technical and legal requirements. **Construction & Timeline.** There was a sense of urgency in the community about the construction timeline. Several participants expressed impatience and concern about delays in the project, urging that work begin promptly to improve regional connectivity and infrastructure. The authorities reassured the public that construction efforts were underway, with plans to start as soon as possible and with high expectations for quality, based on the successful completion of other nearby projects.

■ **September 27th 2024 meetings in Bare Kraljske**

The route was not changed in the impact area of Bare Kraljske. The discussion during the meeting focused on several issues regarding the highway route in the local communities of Bare Kraljske and Mateševci,

specifically related to the route based on the Preliminary Design. Most of the discussion was a repetition of what was discussed during July 23, 2024. **Communication with Authorities:** Participants emphasized the need for ongoing communication between the local community and the state authorities involved in the highway construction. The President of the local community (MZ) emphasized the importance of receiving information related to the project, and suggested that the alignment be optimized in certain areas during the detailed design phase. **Concerns about Demolitions:** A major topic was the impact of the highway on existing structures. Participants expressed concerns about specific homes that would be demolished or impacted by the route. There were suggestions that minor adjustments to the route could avoid demolishing some of the affected structures and raised questions about how homes in close proximity to the highway or under the planned bridge would be affected, especially in terms of living conditions. One participant specifically questioned whether there were regulations regarding the distance between residential buildings and the highway, as his house would be less than 15 meters away from the bridge's pillar. **Property Valuation and Expropriation:** Several participants voiced concerns about the property valuation process and how expropriation is being handled. There were complaints about omissions when recording properties and assessing their value. One participant asked whether only the part of the land over which the route passes would be expropriated, or if the entire parcel would be affected. There were also requests for the Commission to assess the usability of land that would be only partially expropriated and establish clear principles for handling such cases. Citizens expressed dissatisfaction with the work of the Property Valuation Commission, citing inconsistencies and errors in the assessment. **Restrictions on Construction and Expropriation Process:** Several participants mentioned the restrictions they faced, including bans on building new houses or repairing existing ones. They requested clearer information on which structures would be demolished and insisted on checking the Cadaster data for accuracy. They also called for standardizing the criteria for expropriation and ensuring that any remaining parts of expropriated properties are assessed correctly. **Support for Highway Construction:** Despite the concerns, in general support for the highway project, acknowledging its benefits for the village and the region. However, they emphasized the importance of maintaining good living conditions for those whose homes would not be demolished. In conclusion, the main concerns revolved around the transparency and fairness of the expropriation and valuation process, the impact of the route on local properties, and ensuring that the highway project benefits the community while minimizing harm to individual households. **Interchange in Bare Kraljske:** This meeting was finalized with the reiterated request to consider the construction of an interchange in Bare Kraljske as detailed during the meeting held on July 23, 2024.

■ **September 27th 2024 meetings in Matesevo**

Public participation and transparency. There were concerns from the community about the lack of adequate public consultation and that they had not been provided with information about the alignment. **Impact on Property & Expropriation.** The expropriation process raised significant concerns, particularly regarding the cooperation and communication with the Real Estate Administration in Kolasin. Concerns were raised about a groups of 7 structures not required for the footprint of the highway but fronting the highway in close proximity and whether further modifications to the alignment can be made to avoid impacts and maintain access to the homes. **Experience with past projects.** Examples of adverse impacts from contractors off site activities during the construction of Smokovac – Matesevo were shared (another section of the BBH preceding the Section Matesevo –Andrijevisa). Road safety, damages to local roads,

speeding vehicle, and overloaded trucks, were highlighted, as were drainage solutions, impacts on community connectivity, and land restrictions imposed after the highway's construction, where some of the difficulties the community encountered.

▪ **December 4, 2024, with members of the community Bare Kraljske**

A meeting was held with mostly property owners in the local community Bare Kraljske to follow up on some of the concerns raised during the September 2024 meeting. What remained as a concern and was highlighted are the residential structures fronting the highway, where there was no clarity on mitigation and potential further avoidance measures, and the continued request for the project to include the additional interchange in Bare Kraljske. The meeting was dominated by different perceptions of the participants relevant to their own properties and a strong request for MONTEPUT to keep engaging with the community during the Detailed Design phase.

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The below are the summarized concerns per topic from the 8 individual Minutes of Meeting prepared in form of transcript and intends to complement these by summarizing the most common topics, questions, opinions and concerns related to alignment before and after modification (from Tunnel Trešnjevik to Andrijevica) and the Mateševo-Andrijevica Section in general.

Topics were similar but not identical across the local communities. What was observed that positions were polarized – with evidently different perceptions of vested interests between majority participants who were in favour of the proposed modifications to the alignment and those who expressed clear opposition advocating that the Preliminary Design route has been approved and should be implemented.

1. Dissatisfaction with stakeholder engagement, communication and neglect of citizens' views on issues affecting their lives and assets.

The patterns and scale of dissatisfaction exhibited were unified across all the meetings. Even those groups supporting the Project, and the modified alignment respectively, are of the opinion that their views and opinions were neglected during the early planning phases. The dissatisfaction is particularly focused on the municipal and cadastral authorities' conduct – the Real Estate Agency, in the course of processing the expropriation. The main determinants of dissatisfaction were: lack of information in general, lack of timely and written notifications, accessing properties and undertaking activities thereon without proper identification, unannounced surveys and visits to households by valuation experts for purposes of asset census, survey and enumeration and assessment of other impacts as a result of expropriation under the unmodified Preliminary Design. Many of participants stated that this is the first time they received any information regarding the construction and expropriation activities. In summary, participants assessed stakeholder engagement activities as overdue, inconsistent, sporadically, and unstructured.

2. Perceived protraction and deliberate delays in the land acquisition process (expropriation) since February 2024 when the Public interest was declared and doubts on legitimacy of the modified

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alignment and perceived loss of economic opportunities were common denominator among the groups opposing the changes of the alignment.

The land acquisition topic revolved around the following areas of concern:

- Dissatisfaction with how the expropriation process was carried out and handled thus far (Conduct of the local authorities (Real Estate Agency) and inadequacy in information sharing and interaction with persons affected by land acquisition and conduct of valuation experts during the site surveys, census activities and site visits – also see point 1 above).
- Dissatisfaction with the alignment modification due to prior investments and/or expectations of economic prospects and gains from the compensation and their perception that the changes in the alignment have deprived them of such options. In one case prior investments was allegedly demonstrated in anticipation of the land acquisition to be completed and financial loss claimed. All other concerns were voices of perceived impacts of missed opportunities to relinquish assets in exchange to compensation given that the modified alignment avoids impacts to their specific assets. MONTEPUT has committed to investigate this and compensate those cases where impact has occurred and can be verified.

Based on the observed meetings and course of discussions it appears that the focus of individuals that opposing the modification of the alignment was placed to their perceived loss of anticipated compensation for expropriation. This is opposed to the views of what appeared to be a majority of participants during public meetings, concerns focused on preservation of rural settlements, sustaining of social cohesion, avoidance of physical displacement in the endeavour to stop rural outmigration.

3. Claims of economic loss resulting from development /construction restrictions on land imposed by the Highway Bar – Boljare Spatial plan

Allegations were raised that land owners within the highway corridor were restricted in their construction rights on their land in the past (different periods were stated between 3 and 16 years). This concern was raised at multiple meetings but by the same participants. MONTEPUT relying on data from Municipalities' Kolasin and Andrijevisa and their internal records, reported that there were no requests for obtaining construction or other permits pertaining to the rural areas in the past several decades. There were cases of request for information on development conditions for certain land plots. MONTEPUT has committed to investigating this subject further in lieu of commitments made under item 2 above.

4. Request to avoid physical displacement impacts and maintenance of pre-Project standards of living for non-displaced households

A significant number of citizens opposed the route outlined in the Preliminary Design due to the substantial physical displacement it would cause. They strongly emphasize the importance of being allowed to remain in their current homes, in the place of their birth, where they have raised their children, and where their parents, and often previous generations, have lived and continue to live. The participants in a number of cases anticipate that the highway will bring significant development opportunities to both the region and their households. The most common expectation is that, after the highway's construction, the improved connectivity between these villages, Podgorica, and other cities, along with reduced travel time, will encourage younger members of the households—currently working in those cities—to return

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and settle in the villages. They expect these individuals will commute daily to Podgorica for work. Arguments in favour of the preceding expectation stated that rural settlements have lower cost of living, provide for housing, are more suitable for raising children, have a cleaner and unpolluted environment, and that there are 30 minutes' drive employment opportunities in Podgorica. This attitude was widespread among the majority of participants. According to data from ESIA, the Northern part of MNE has a below-average population density and is the least developed area of MNE, with a high degree of emigration to larger cities, especially to Podgorica and abroad. One of the most important functions of the Highway and the most common expectation from this Project is mobility enhancement and the opportunity for stop of demographic decline and emigration. The interlocutors reminded of the exceptional nature and the potential the Northern Region of MNE offers but only with people living there. Recognition that the Highway can encourage the activation of natural potentials and development resources and can fulfil the role of stopping emigration was widespread. In these expectations, they believe that it is very important to preserve rural settlements, to restore and improve physical assets, both private houses, estates and business activities, as well as public institutions and infrastructure.

In addition, it was highlighted that even in cases where direct impacts to houses are avoided it has not been done so as to prevent deterioration of their living conditions due to the proximity of the highway especially and structures, such as bridges, overpasses etc. They consider that the alignment cannot collide with the current use and dynamic of residential and other structures as well as land with the land use.

5. Preservation of social cohesion of settlements

Participants noted that in the context of social history Montenegro settlements have very specific features. The population in rural areas demonstrate close and intensive ties to family, tribal, relatives, historically important and other affiliations. Montenegro, especially in the Northern Part continues to nurture traditional forms of attribution and affiliation among family and relatives (nuclear and extend family). Settlements are considered not just as territorial units but more importantly as set of intertwined and interrelated family, relatives, traditional friendship bonds. For the majority of participants from Kralje, Gnjili Potok, and Slatina this was one of the main drivers in support to the modified alignment stating that the compensation from the expropriation interest is secondary to the need to preserve the current settlements. They were often stating that they also speak for their relatives living abroad or in other parts of Montenegro.

6. Claims of environmental harm from the Route change

Claims on Environmental harm to the Komovi mountains, the river Kraštica and its surroundings from the new alignment were raised.

7. Request for an additional Interchange Bare Kraljske

During all meetings with the community in Bare Kraljske requests were repeated for MONTEPUT to explore the option for including an additional interchange with the argumentation that this interchange would serve the wider gravitation area including tourist centres of Bjelasica and Komovi. The local community is intending to initiate amendment to the Spatial Plan of Montenegro which is under development. MONTEPUT took this suggestion under advisement but provided arguments why they consider this request not to be feasible: the construction of the interchange in the suggested location would be difficult for construction, would require physical displacement, would be very costly and cannot

be considered without this interchange to be provided by the Spatial Plan. As an alternative to the interchange it was suggested that the reconstruction of the Regional road from Mateševu to Andrijevića would achieve the same objective. During meeting No. 7 when the modified alignment was consulted and presented the local community requested MONTEPUT to explore whether during the Detailed Design phase adjustments to the route can be made to avoid physical displacement of the few residences affected by the PD since the alignment was not modified from Mateševu to Trešnjevik. MONTEPUT was not able to respond immediately clarifying that any change in the position of the alignment has numerous other implications, but that they will consider moving the rest areas which might achieve avoidance of impacts. It was explained that noise and visual nuisance's barriers are planned based on the noise modelling results. However, the concern was taken on record and will be explored with the EPC contractor during the Detailed Design.

8. Road Safety during construction and damages to existing road network

Across all the meetings, but with elevated focus on this issue in Mateševu and Bare Kraljske, safety issues during construction and damages to public roads from construction traffic were highlighted as key concerns. Experience and lessons learned from construction of the first section Smokovac – Mateševu was elaborated including the key risks the communities have identified. These risks mainly are around speeding traffic on and off the construction work zones, inadequate sign posting, significant road damages and traffic disruption including interfaces between the public roads and construction site.

9. Innuendos and personal views of individuals

During 2 out of 8 meetings, a few participants misrepresented the number of displacement cases in arguing in favour of the unchanged route from the Preliminary Design. They alleged the design was modified to benefit local businesspersons, had disregarded known landslide areas, lacked investigations, and violated engineering standards. They also insinuated corruption and power abuse by MONTEPUT management. MONTEPUT countered these claims, rebutting data misinterpretation.