



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

Gap Analysis & Disclosure Pack Section Mateševo – Andrijevića

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Consultant



PASECO SP LTD
26, Fokionos Negri str.,
11361 Athens, Greece

March 2025

Table of Contents

1 Introduction..... 4

2 Environmental & Social Action Plan 6

Abbreviations

Abbreviation	Meaning
APCH	Administration for Protection of Cultural Heritage
CESMP	Construction Environmental and Social Management Plan
CHMP	Cultural Heritage Management Plan
CRO	Community Relations Officer
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environmental Health and Safety
EPC	Engineering, Procurement, and Construction
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMMPs	Environmental Social Monitoring Management Plans
ESMP	Environment and Social Management Plan
ESMS	Environmental and Social Management System
EU	European Union
GBV	Gender-based Violence
GM	Grievance Mechanism
FC	Financial Closure
HR	Human Resources
IFC	International Finance Corporation
LARF	Land Acquisition and Livelihood Restoration Framework
MCI	Ministry of Capital Investments
LARP	Land Acquisition and Resettlement action Plan
MNE	Montenegro
PIU	Project Implementation Unit
PR	Performance Requirement
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SER	Serbia
SH	Sexual Harassment
TEM	Trans European Motorways
TEN-T	Trans-European transport network
TMP	Traffic Management Plan

1 INTRODUCTION

The Bar-Boljare Highway (BBH) in its length of 168 km, which the section Mateševó – Andrijevíca is a part of, forms the Trans European Motorway (TEM) branch route through Montenegro. This BBH road is part of the E-80 and E-65 routes, comprising SEETO Route 4 [Romanian border/Vatin – Belgrade (SER) – Podgorica (MNE) – Bar (MNE)]. The Highway connects the Adriatic Coast (Port of Bar) to the border of Serbia (Boljare) and with ports on the Danube (Corridor VII and Corridor X) and, ultimately, with the entire so-called Pan-European corridor network and integrate the TEN-T extension in the Western Balkans.

The development phases for the entire BBH are as follows:

- Section I: Smokovac–Mateševó
- Section II: Mateševó–Andrijevíca and the Smokovac–Tološi–Farmaci bypass;
- Section III: Andrijevíca–Boljare
- Section IV: Podgorica – Đurmani

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 “Mateševó - Andrijevíca” part of the Bar - Boljare Highway into the unified list of priority infrastructure projects.

The section Mateševó–Andrijevíca, subject to the present ESIA disclosure dossier, is 23.5 km long (14% of the total length of the Bar - Boljare highway).



Figure 1: The Bar-Boljare Highway and Mateševó - Andrijevíca section

The start point is after the Mateševsko IC (Smokovac – Mateševsko section). The end of the exploration area is the area of the Kraštica River, tributary of Lim River, near Andrijevica. Part of the Mateševsko-Andrijevica highway section is located within the municipality of Kolašin while the rest is located within the municipality of Andrijevica.

The activities undertaken in preparation of the mandatory documentation for the Mateševsko-Andrijevica Section, can be observed through two continuous development phases, without overlapping sequences.

The first phase, started by the General Design (Louis Berger SAS-Paris, Simm Engineering –Podgorica) in 2008, when three alignment alternative solutions were examined. The work continued in 2018 when the Government of Montenegro benefited from Technical assistance services (TA) for the preparation of the Preliminary Design and Social Impact Assessment (ESIA) supported through a Western Balkans Investment Framework (WBIF) Grant. Under the Scope of work of the said TA together with earlier efforts financed by the Government of Montenegro, the following studies were developed:

- Preliminary Design for the Section Mateševsko-Andrijevica adopting Variant 3, approved by the State Review Committee (2022)
- National EIA for the Mateševsko – Andrijevica section, (2024) for which the consent of the Environmental Protection Agency was given with the Decision 03-UP-652/28 dated May 14th, 2024, based on the above Preliminary Design.
- Preliminary ESIA for the Mateševsko – Andrijevica, drafted under the WBIF, based on the approved Preliminary Design, inclusive of a LARF and SEP, submitted in July 2023, which was not disclosed as final nor consulted.
- Preliminary ESIA prepared as a part of the Feasibility Study for the entire Bar-Boljare highway (2021).
- Strategic environmental impact assessment for Detailed spatial plan of Bar-Boljare highway (2008)

The second phase started during the first half of 2024 and was marked by two determining factors:

- (1) the Intention of EBRD to financially support the Government of Montenegro through a loan which required assessment on compliance of the entire 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 address, at that time already raised and known concerns of three out of eight settlements, through formalizing and enhancing stakeholder engagement activities in exploring viable alternatives to the alignment in the areas of concerns (from the exit portal of Tunnel Trešnjevik to interchange Andrijevica).

The overview of the current status of activities and documentation required to continue with development of the Section Mateševsko-Andrijevica, and planned schedule is summarized below:

- **Engineering design and Construction schedule:** the Preliminary Design, which includes preliminary routing and layout, was prepared in 2022 and 2024 (for the change in the alignment). The Detailed Design phase is expected to start in 2025 following the award of the Design and Build Contract. MONTEPUT foresees a time for completion of 60 months starting from the Commencement date (with additional 24 months Defect Notification Period). This procurement procedure is guided by EBRD Procurement guidelines utilizing the EBRD Standard Bidding Documents.
- **Supervision over Design and Works:** MONTEPUT has published an invitation for Prequalification for selection of Supervision for preparation of Detailed Design and Construction Works for the Mateševsko - Andrijevica Section. The Contract is expected to be awarded beginning of 2025.
- **Technical Assistance** - MONTEPUT has published an invitation for Prequalification for selection of a Consultant to support MONTEPUT in managing the Design and Works Contractor the Mateševsko - Andrijevica Section. The Contract is expected to be awarded beginning of 2025.
- **Expropriation:** the Project will require private land rights and assets to be acquired through expropriation. However, the Detailed Design will confirm the exact project land needs and economic

and physical displacement impacts after mitigation measures have been considered and operationalized. There are some estimations of the area required including the number of physical and economic displacement cases. The Route change has also changed the physical footprint, minimized land acquisition and physical displacement. The changes also require changes in the declared and disclosed decision on Public interest.

- **Civil Works:** Preparatory works are expected to commence mid-2025, while the Permanent works will commence after approval of the Detailed Design by the Review Committee, the Road Safety Audit and after the Construction permit is obtained, (expected in late 2026/early 2027). The Detailed Design will be developed in sub-sections each of which will have a separate Construction permit to allow phased construction.

2 ENVIRONMENTAL & SOCIAL ACTION PLAN

This Environmental and Social Action Plan (ESAP) includes key actions which the Borrower should undertake during the implementation of the Project to ensure that EBRD's Performance Requirements (PRs), EU regulations and international standards, as well as national legislation are met. ESAP has been developed taking into account the findings of the ESIA carried out. The Project will be implemented by MONTEPUT d.o.o., a Stet owned road Management Company which will utilize this ESAP during implementation of the Project. **The ESAP will constitute an integral part of the financing agreement with the EBRD**

MONTEPUT will **be responsible for ensuring that third parties or contractors working on project sites meet the requirements of the ESAP** by adopting and implementing proper contractor management. This is expected to be accomplished by inclusion of appropriate requirements and conditions in tender documents, contracts and subcontracts, and through direct oversight and supervision by MONTEPUT. MONTEPUT will also **be responsible to ensure actions specified in the ESAP are implemented in the operation and maintenance phase by the Operator of the Road i.e. Monteput d.o.o.**

MONTEPUT is required to establish and maintain a Project specific Environmental and Social Management System (ESMS) appropriate to the nature and scale of the Project and commensurate with the level of its E&S impacts and issues in line with good international practice. The MCI will need to designate specific personnel, including management representative(s), with clear lines of responsibility and authority to maintain and implement the ESMS, and ensure that employees with direct responsibility for activities relevant to the E&S performance of the Project and the MCI operations are suitably qualified and trained. It is also required to establish an overarching E&S Policy defining the objectives and principles that enable the Project to achieve sound E&S performance.

MONTEPUT will monitor the implementation of actions specified in this ESAP. Based on the monitoring results, it will identify and reflect any necessary corrective and preventive actions in an amended ESAP if necessary (as to be agreed with the Lenders), implement the agreed corrective and preventive actions, and follow up on these actions to enhance their performance. **Regular reports will be provided to EBRD on the E&S performance of the Project**, including compliance with the EBRD's PRs, and implementation of this ESAP, the Framework Environmental and Social Management Plan (ESMP), the Stakeholder Engagement Plan (SEP) the Land Acquisition and Resettlement Framework (LARF) and Land Acquisition and Resettlement Plan (LARP).

MONTEPUT will prepare and submit to EBRD Semi-annual reports on E&S issues during the construction phase and annual reports during the operation phase as required by the Loan Agreement to be signed and will be audited or otherwise evaluated by EBRD throughout the implementation phases of the Project. The EBRD may also periodically verify the monitoring information through site visits by its E&S specialists and/or independent experts and may also engage Lenders Environmental, Social and Technical Advisors. EBRD shall be promptly notified of any E&S incident or accident related to the Project which has, or is likely to have, a significant adverse effect, or of any changes to the Project's scope, design or operation that is likely to materially change its E&S

impacts and issues. Further notification requirements in the form of legal covenants shall be specified in the Loan Agreement.

Table 1: Environmental and Social Action Plan

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
PR1	Assessment and Management of Environmental and Social Risks and Impacts						
1.1	Establish a Project Implementation Unit (PIU) with the responsibility to manage the Project.	Optimisation of environmental and compliance with EBRD requirements	EBRD PR1 Voluntary and best practice	MONTEPUT Own resources, external consultants Cost: Salaries of MONTEPUT employees plus consulting fees Responsibility: MONTEPUT	Prior to Financial close (FC)	<i>Target:</i> PIU Institutional capacity for management of E&S risk and impacts established <i>Evaluation Criteria:</i> Roles and responsibilities assigned and communicated to all participants of the Project. EBRD notified of established PIU	
1.2.	The Project shall develop and maintain an Environmental and Social (E&S) Aspects and Impacts Register, based on the ESIA and Supplementary E&S Assessments, for: a) Construction phase, and b) Operations phase.	Optimisation of environmental and compliance with EBRD requirements	EBRD PR1 Voluntary and best practice	MONTEPUT Own resources, external consultants Cost: Salaries of MONTEPUT employees plus consulting fees Responsibility: MONTEPUT	a. Prior to FC. b. Prior to the start of operations.	Evaluation Criteria: a. E&S Aspects and Impacts Register for the construction phase. b. E&S Aspects and Impacts Register for the operations phase.	
1.3	Carry out national Environmental and Construction permitting procedures overall and whenever changes to the Design require amendment of permits	Compliance with national requirements and EBRD	EBRD PR 1 National requirements	MONTEPUT Own resources, external consultants Cost: Salaries of MONTEPUT employees plus taxes and fees Responsibility: MONTEPUT	Prior to commencement of works	Evaluation Criteria: a. Project permits obtained and EBRD notified of obtained permits	
1.4	Develop and implement an overarching Project Environmental and Social Management System (ESMS) for the lifecycle of the Project construction and operations) which shall include: a) Project-specific Environmental and Social (E&S) Policy signed by Project sponsor, i.e. MONTEPUT d.o.o (MONT), b) Demonstrate the Project E&S governance structure supported by a detailed organogram of project management roles and responsibilities, describing the interfaces between MONT Engineering, Procurement and Design and Construction Contractor and subcontractors; c) An ESMS Handbook or Manual, and supporting documentation that addresses identification of risks and impacts; management programs; emergency preparedness and response, stakeholder engagement, and monitoring and review. d) Project-specific Environmental Social Management Plans (ESMPs)).	Optimisation of environmental management through a formalised system.	EBRD PR 1 EBRD PR 2 EBRD PR 4 EBRD PR 8	a) MONTEPUT own resources b) MONTEPUT own resources c) MONTEPUT with the support of The Technical Assistance Consultant d) Contractor	a) Final prior to Financial Close (FC), or substantially advanced and evidence of implementation demonstrated. b) Final prior to FC or substantially advanced and evidence of implementation demonstrated. c) Prior to FC or substantially advanced and evidence of implementation demonstrated. d) Refer to ESAP Actions 4, 5, 8 and 9.	Target: ESMS in place to manage E&S risks and impacts Evaluation Criteria: a) Project-specific Environmental and Social (E&S) Policy signed by Project sponsor, i.e. MONTEPUT d.o.o (MONT), b) Demonstrate the Project E&S governance structure supported by a detailed organogram of project management roles and responsibilities, describing the interfaces between MONT Engineering, Procurement and Design and Construction Contractor and subcontractors; c) An ESMS Handbook or Manual and supporting documentation that addresses identification of risks and impacts; management programs;	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
						emergency preparedness and response, stakeholder engagement, and monitoring and review. d) Project-specific Environmental Social Monitoring Management Plans (ESMMPs) (refer to ESAP Actions 4, 5, 8 and 9).	
1.5	The Project shall develop and implement: a) A Project Construction Environmental and Social Management Plan (CESMP) with implementation measures that link to the Project ESMS, including stakeholder mapping, clear roles and responsibilities, evidence of engagement with third parties, and E&S capacity for MONTEPUT, the Contractor and other stakeholders; b) Contractor CESMP; and c) Supporting policies, plans, procedures and checklists within the Project and/or Contractor CESMP, including but not be limited to: i. Environmental and Social Policies (refer to ESAP Action 1); ii. Environmental and Social Monitoring Plan, including monitoring locations, frequencies and standard operating procedures; iii. Occupational Health and Safety Management Plan; iv. Emergency Response and Incident Management Plan; v. Infrastructure and Utilities Management Plan vi. Grievance Redress Mechanism; vii. Spill Prevention and Response Plan; viii. Water Quality Management Plan ix. Soil Erosion, Reinstatement and Landscape Management Plan; x. Waste Management Plan; xi. Wastewater Management Plan; xii. Hazardous Materials Management Plan; xiii. Construction Community Health & Safety Risk Management Plan including cross-referencing to supporting plans); xiv. Traffic Management Plan; xv. Security Management Plan (supported by a security risk assessment); xvi. Workers' Accommodation Management Plan; xvii. Labor Management Plan - xviii. Blasting management plan xix. Stakeholder Engagement Plan; xx. Cultural Heritage Management Plan (refer to ESAP Action #8.1; and xxi. Management of Change Procedure. d) Quarry/Borrow pits Management Plan.		EBRD PR1, EBRD PR 2 EBRD PR 4 EBRD PR8	a) EPC Contractor b) EPC Contractor c) EPC Contractor d) EPC Contractor	a) Final prior to FC, or substantially advanced and evidence of implementation demonstrated. b) Final prior to FC, or substantially advanced and evidence of implementation demonstrated. c) Final prior to FC, or substantially advanced and evidence of implementation demonstrated d) Draft prior to FC, final one month prior to commencement of quarry /borrow pits operations.	Target: CESMP in place to manage E&S risks and impacts during construction Evaluation Indicators a) Project CESMP framework with implementation Plan. b) EPC Contractor CESMP. c) Individual plans with supporting policies, methods, procedures, checklists. d) Quarry/Borrow pits Management Plan	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
1.6	The Project shall engage and/or retain E&S personnel required to deliver the Project in accordance with the Applicable Standards and provisions of this ESAP for: a. The construction phase, including but not limited to: i. Environmental, Safety and Health Manager acting on behalf of MONTEPUT; ii. Contractor Environmental, Safety and Health Manager; iii. Contractor Deputy Environmental, Safety and Health Manager; iv. Contractor Licensed Safety Engineer; v. Contractor Environmental Lead; vi. EPC Contractor Environmental, Safety and Health Specialists; vii. EPC Contractor Community Relations, Sustainability and Public Relations Manager; viii. EPC Contractor Community Relations, Sustainability and Public Relations Lead; ix. EPC Contractor Human Resources / Labour Relations Manager; x. EPC Contractor Camp Manager; xi. EPC Contractor Community Relations Officers, including at least one female CRO; xii. EPC Contractor competent biologist; and xiii. EPC competent archaeologist/cultural heritage specialist as needed . b. The operations phase, including but not limited to: i. Environmental, Safety and Health Manager; ii. Environmental, Safety and Health Specialists; iii. Worker Welfare Specialists; and iv. Community Liaison Officers, including at least one CLO.						
1.7	Submit regular progress reports to EBRD including information on ESAP implementation progress during the construction phase and annual reports during the operation phase as required by the Loan Agreement	Implementation of the ESAP to mitigate Project-related risks and fulfilment of the reporting requirements to EBRD	EBRD PR1 Respective E&S Covenants in the Legal and Project agreements with EBRD	Resources: MONTEPUT internal resources Investment needs: None Responsibility: MONTEPUT	As per the loan agreement	Target: Regular and on time reporting to the Lenders Evaluation Criteria: Internal responsibility assigned for submission of reports to the Lenders	
1.8	Promptly notify EBRD of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury [specify other examples of incidents and accidents, as appropriate for the type of operation]. Provide sufficient detail regarding the scope, severity, and possible causes of	Implementation of the ESAP to mitigate Project-related risks and fulfilment of the reporting requirements to EBRD	EBRD PR1 Respective E&S Covenants in the Legal and Project agreements with EBRD	Resources: MONTEPUT internal resources Investment needs: None Responsibility: MONTEPUT	Notify the EBRD no later than 48 hours after learning of the incident or accident. Provide subsequent report to the EBRD within a timeframe acceptable to the EBRD	Target: Timely notification on incidents and accidents	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate. Subsequently, at EBRD request, prepare a report on the incident or accident and propose any measures to address it and prevent its recurrence.						
PR2	Labour and Working Conditions						
2.1	The Project shall develop and implement a set of human resource (HR) policies and procedures for construction in line with the labour laws of Montenegro and EBRD Performance Requirements 2, including but not limited to: a) Overarching HR Policy that is owned by MONTEPUT and is cascaded down to the Contractor and subcontractors, including key commitments to non-discrimination, equal opportunity, prohibition of child and forced labour, and respect for the right to organise and collective bargaining; b) Labour Management Procedures; c) Recruitment Plan; d) Workers' Code of Conduct, taking into account gender-based violence (GBV) and community health, safety and security; e) Right of workers to unionize; f) Demobilization Plan following completion of construction; g) Workers' Grievance Mechanism, including contractors and subcontractors (taking into account mechanism and training to receive GBV related complaints); h) Worker accommodation monitoring plan and procedures in accordance with the Workers' Accommodation: Processes and Standards Guidance Note (IFC/EBRD, 2009), to include provision for pre-occupancy audit, regular inspections and periodic audits; and i) HR Monitoring Plan to verify compliance with the HR policies and procedures, including by contractors and subcontractors.	Implementation of the ESAP to mitigate Labor and Working condition Project-related risks and fulfilment of the reporting requirements to EBRD	EBRD PR2	EPC Contractor	To i) Final prior to FC, or substantially advanced and evidence of implementation demonstrated.	Target: Achieving EBRD PR 2 standards Evaluation Criteria: Submission of evidence of the following: (a) Overarching HR Policy that is owned by MONTEPUT and is cascaded down to the Contractor and subcontractors, including key commitments to non-discrimination, equal opportunity, prohibition of child and forced labour, and respect for the right to organise and collective bargaining; (b) Labour Management Procedures; (c) Recruitment Plan; (d) Workers' Code of Conduct, taking into account gender-based violence (GBV) and community health, safety and security commensurate to the risks; (e) Right of workers to unionize; (f) Demobilization Plan following completion of construction; (g) Workers' Grievance Mechanism, including contractors and subcontractors (taking into account mechanism and training to receive GBV related complaints); (h) Worker accommodation monitoring plan and procedures in accordance with the Workers' Accommodation: Processes and Standards Guidance Note (IFC/EBRD, 2009), to include provision for pre-occupancy audit, regular inspections and periodic audits; and (i) HR Monitoring Plan to verify compliance with the HR policies and procedures, including by contractors and subcontractors.	(b) developed as part of the ESIA

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
2.2	The Project shall: a) undertake a labour audit of each subcontractor semi-annually during construction including completing the Checklist on Workers' Accommodation (Annex I of the IFC/EBRD Guidance) and sent to the EBRD	Ensure Compliance with Project standards	EBRD PR2	Independent Labour Specialist of the Supervising Engineer or Technical Assistant Consultant	Every six months during construction	Labour audit report.	
2.3	The Project shall develop and implement a set of human resource (HR) policies and procedures in line with the labour laws of Montenegro and EBRD Performance Requirement 2 for operation as it relates to contractors and sub-contractors performing maintenance activities of the motorway; The HR policies and procedures shall include but not be limited to: i. Overarching HR policy, including key commitments to non-discrimination, equal opportunity, prohibition of child and forced labour, and respect for the right to organise and collective bargaining; ii. Workers' Code of Conduct (taking into account gender-based violence (GBV) and community health, safety and security); iii. Retrenchment Policy; and iv. Workers' Grievance Mechanism.	Ensure Compliance with Project standards	EBRD PR2	Monteput Doo	Six (6) months prior to the start of operations.	HR policies and procedures for operations.	
PR3	Resource Efficiency and Pollution Prevention and Control						
3.1	The Project shall: • Adopt applicable air & noise pollution prevention measures as described in the ESIA for construction and monitor compliance.	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Contractor's cost, Construction contractor	Adopt and implement throughout construction as indicated in the ESIA.	- Meet National legislation, EU standards and EBRD PR 3 requirements. - Take corrective actions - Adopt appropriate mitigation measures to meet the requirements.	
3.2	The Project shall: a) Adopt and implement monitoring procedures for air quality and noise as described in the ESIA and the national EIA b) Calculate GHG during operation	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4. National & EU legislation. EU standards.	Monteput own resources/E&S manager.	a) As per Environmental Monitoring Plan included in the ESIA b) Annually during operation	Target: - Meet National legislation, EU standards and EBRD PR 3 requirements. - Evaluation: - Inclusion of outcomes in annual E&S compliance report to the Bank. - Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.3	The Project shall: a) Adopt applicable water & soil pollution prevention measures as described in the ESIA during construction. b) Ensure that equipment for dealing with leaks and accidental discharges is present at site at all times.	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Contractor's cost, Construction contractor	Adopt and implement throughout construction as indicated in the ESIA.	Meet National legislation, EU standards and EBRD PR 3 requirements. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
3.4	The Project shall: a) Adopt applicable water & soil pollution prevention measures as described in the ESIA during operation . b) Implement pollution prevention measurements according to ESMP c) Implement the monitoring procedures during operation.	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Own resources, Monteput d.o.o/E&S manager.	Adopt and implement throughout operation Conduct measurements as described in the Environmental Monitoring Plan	Meet National legislation, EU standards and EBRD PR 3 requirements. Inclusion of outcomes in annual E&S compliance report to the Bank. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.5	Adopt and implement Waste Management Plan for construction and monitor compliance	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Contractor's cost, Construction contractor Licensed companies to be engaged in waste transportation to final disposal sites (both for non-hazardous and hazardous waste)	Adopt and implement throughout construction as indicated in the ESIA.	Meet National legislation, EU standards and EBRD PR 3 requirements. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.6	Adopt and implement at all times Waste Management Plan for operation and monitor compliance	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Own resources, Monteput d.o.o/E&S manager Licensed companies to be engaged in waste transportation to final disposal sites (both for non-hazardous and hazardous waste)	Adopt upon signing of the Project agreement and implement throughout the project circle as indicated in the ESIA.	Meet National legislation, EU standards and EBRD PR 3 requirements. Inclusion of outcomes in annual E&S compliance report to the Bank. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.7	Adopt appropriate protocols and measures for hazardous waste handling	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4, PR6. National & EU legislation. EU standards.	Own resources, Monteput d.o.o/E&S manager	Adopt upon signing of the Project agreement and implement throughout the project circle	Meet National legislation, EU standards and EBRD PR 3 requirements. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.8	Adopt and implement traffic management plan for construction. The TMP shall include measures and guidance concerning optimum roads and times hours, as well as appropriate signalling	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4. National & EU legislation. EU standards.	Contractor's cost, Construction contractor	Adopt and implement throughout construction as indicated in the ESIA.	Meet National legislation, EU standards and EBRD PR 3 requirements. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
3.9	Adopt and implement traffic management system for operation.	Addressing of environmental and social risk. Improvement of performance.	EBRD PR1, PR3, PR4. National & EU legislation. EU standards.	Own resources, Monteput d.o.o/E&S manager	Adopt upon signing of the Project agreement and implement throughout the project circle	Meet National legislation, EU standards and EBRD PR 3 requirements. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
PR4	Health, Safety and Security						
4.1	Appoint a qualified Health and Safety (H&S) Manager to take overall responsibility for Project H&S compliance with clear Job description.	Effective management of occupational H&S issues and prevention of fatalities	Best Practice, EBRD PR1, EBRD PR2, EBRD PR4. National Legislation on OHS and Security	Contractor Sub-Contractor	As soon as practicable after signature of Contract	H&S Manager to be appointed and communicated to MONTEPUT and the Engineer * Supervision Consultant	
4.2	Develop CESMP refer to item 1.5 of ESAP	Safer working conditions Ensure community Health and Safety	EBRDPR4 National Legislation	EPC Contractor Cost: Included in Bid Price	Prior to Commencement of any works including preparatory and temporary	- Project CESMP framework with implementation Plan. - EPC Contractor CESMP.	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
				<i>Responsibility:</i> EPC Contractor		- Individual plans with supporting policies, methods, procedures, checklists. - Quarry Management Plan	
4.3	Impacts on the local communities. As part of the ESMS carry out regular assessments of the impact of construction works and later operation. Key issues are noise, traffic (heavy lorries) and dust emissions.	Benefit: Avoidance/Minimise action of incidents and associated liability Better relationship with local residents	EBRD PR4 National Legislation	EPC Contractor Cost: Included in Bid Price <i>Responsibility:</i> EPC Contractor	Prior to Commencement of any works including preparatory and temporary		
4.4	Consult with affected communities and relevant government agencies about the proposed measures before they are finalised and take their concerns and comments into account. The client will review the measures regularly, and engage the affected communities and agencies on an ongoing basis, informing them on the status of implementation of plans and commitments, results, and discussing with them any material changes needed to the plans	Avoid or minimise risks to and impacts on the health and safety of the local community during the project life cycle from both routine and non-routine circumstances	EBRD PR4 National Legislation	EPC Contractor Cost: Included in Bid Price <i>Responsibility:</i> EPC Contractor In liaison with Monteput d.o.o.	Prior to Commencement of any works including preparatory and temporary an throughout the project cycle	Meet National legislation, EU standards and EBRD PR 4 requirements Records	
4.5	Make reasonable inquiries to satisfy itself that those providing security are not implicated in past abuses, will ensure they are trained adequately in the use of force (and where applicable, firearms) and appropriate conduct toward workers and the local community, and require them to act within the applicable law. Train security personnel on EHS aspects of the project and include in refresher training ad toolbox talks on issues pertinent to the scope of their assignment.	To ensure that the safeguarding of project related personnel and property is carried out in a legitimate manner that avoids or minimises risks to the community's safety and security	EBRD PR4 EBRD PR10 EBRDPR2 National Legislation	EPC Contractor Cost: Included in Bid Price <i>Responsibility:</i> EPC Contractor In liaison with Monteput d.o.o.	Prior to selection/engagement of	Meet National legislation, EU standards and EBRD PR 4 requirements Records	
4.6	Exercise commercially reasonable efforts to control the safety of transporting raw materials and of transportation and disposal of wastes, and will implement measures to avoid or control community exposure. Information on risk, exposure of population, mitigation measures and monitoring will be provided to the relevant authorities and communicated to the public.	To ensure that the safeguarding of project related personnel and property is carried out in a legitimate manner that avoids or minimises risks to the community's safety and security	EBRD PR4 National Legislation	EPC Contractor Cost: Included in Bid Price <i>Responsibility:</i> EPC Contractor In liaison with Monteput d.o.o.	While developing the TMP	Meet National legislation, EU standards and EBRD PR 4 requirements Records	
4.7	Develop and Implement Emergency Response Plan during operation	Preparedness regarding emergency situations (health, accidents, safety, natural disasters etc.)	EBRD PR 4 Best practice	Own resources, Monteput d.o.o./E&S manager	Implement throughout operation	Meet National legislation, EU standards and EBRD PR 4 requirements Records	
PR5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
5.1	The Project shall develop, disclose and implement the Land Acquisition and Resettlement Framework (LARF)	Manage economic and physical displacement impacts compliant to PR5	EBRD PR5	MONTEPUT Own resources, external consultants Cost: Salaries of MONTEPUT employees plus consulting fees	LARF adopted, disclosed and consulted prior to FC	Target: Land acquisition impacts minimized <i>Evaluation Criteria:</i> LARF developed and approved by EBRD LARF implemented	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
				Responsibility: MONTEPUT			
5.2	Explore technically feasible options to minimize physical displacement impacts while actively engaging and soliciting the views and concerns of local communities	Manage economic and physical displacement impacts compliant to PR5	EBRD PR5 EBRD PR10	MONTEPUT Own resources, EPC Contractor Cost: Cost of design and Construction Responsibility: MONTEPUT and EPC Contractor	Modification to design explored prior to FC	<i>Target:</i> Physical displacement impacts avoided and minimized <i>Evaluation Criteria:</i> Modified designs presented and consulted with local communities Modified designs notified to EBRD including Minutes of meeting with local communities Stakeholder engagement log maintained	
5.3.	The Project shall: Develop Land Acquisition and Livelihood Restoration Plan (s) (LARP)	Manage economic and physical displacement impacts compliant to PR5	EBRD PR5 Law on Expropriation of Montenegro	MONTEPUT Own resources supported by the Social Specialist of the Technical Assistance Consultant	Prior to any displacement taking place	<i>Target:</i> Land acquisition and resettlement completed prior to commencement of works and in compliance with EBRD PR 5 <i>Evaluation Criteria:</i> LARP developed and approved by EBRD	
5.4	The Project shall: a) Undertake a Land Acquisition Resettlement Execution Report by an independent third party for each section of the motorway. The provision for these audits shall be included in the Project ESMS (refer ESAP Action #1); and b) If required, develop a Resettlement Corrective Action Plan which includes a timeline, budget and resource allocation based on the findings of the Audit.	Monitoring of displacement impacts	EBRD PR 5	Independent third party Responsibility: MONTEPUT	a) No later than 12 months following completion of the land acquisition process or livelihood restoration measures, whichever is later. b) Within 60 days of Land Acquisition Resettlement Execution Report	<i>Target:</i> a) Land Acquisition Resettlement Execution Report b) Resettlement Corrective Action Plan. <i>Evaluation Criteria:</i> a) Land Acquisition Resettlement Execution Report approved by EBRD b) Resettlement Corrective Action Plan implemented and compliance note sent to EBRD	
5.5	GRIEVANCE MECHANISM Establish and implement the grievance mechanism (GM) to address resettlement related complaints as warranted by the LARF and SEP.	Preventing social harm Avoiding long-term hardship and impoverishment for affected persons and communities, and adverse socio-economic impacts	EBRD PR 5	Cost: Salaries of MONTEPUT employees Responsibility: MONTEPUT	Prior to FC	<i>Target:</i> Proper management of involuntary resettlement and avoidance of long term hardship <i>Evaluation Criteria:</i> Provide evidence that the GM is established and evidence that the communities have been made aware on its existence and how they can utilize the system	
PR6	Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	Preparation / Implementation of Construction Biodiversity Management Plan, that: - Covers all pre-construction and construction period - considers the baseline conditions, as they have been recorded by the filed surveys already executed	Management of impacts on biodiversity	EBRD PR6 National and EU legislation	EPC Contractor	Preparation to be completed during pre-construction phase Implementation throughout construction phase	In the CBMP net loss / net gain are estimated with adequate metrics as per EBRD guidelines No net loss is results by the project and that net gain can/will be achieved	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	- includes an additional survey regarding aquatic environment (ichthyofauna and benthic fauna) to be conducted during pre-construction - determine any additional surveys that must be conducted during pre-construction, assessing also the need to conduct surveys at the areas of landfills and borrow pits. - considers and incorporates findings of the Critical Habitat Assessment (in the frame of the ESIA) - defines detailed measures and procedures to avoid / prevent / minimise the adverse impacts to biodiversity features, based on the measures described in the ESIA and the national EIA and relevant approval decision - Includes a loss/gain analysis and ensures that for the habitats identified in the project area and characterised as PBF, no net loss is achieved, while for the habitat 91E0*, as well as for the species that qualify as CH as per EU legislation, net gain is achieved. If necessary for achieving net gain, opportunities for offset should be determined. - is updated reflect increased understanding of Project programme and design and incorporates any new information which may be obtained during the pre-construction phase						
6.2	Preparation of an Appropriate Assessment for protected areas	Ensure that candidate Emerald sites are not affected	EBRD PR6 National & EU legislation	EPC Contractor	After drafting of the CBMP	Meet National legislation, EU standards and EBRD PR6 requirements.	
6.3	Implementation of biodiversity monitoring program as indicated in ESMP and the ESIA.	Improvement of performance.	EBRD PR1, PR2, PR3, PR4, PR5, PR6, PR10. National & EU legislation.	Own resources, Monteput d.o.o/E&S manager /External consultant.	As indicated in ESMP.	Meet National legislation, EU standards and EBRD PR requirements. Inclusion of outcomes in annual E&S compliance report to the Bank. Take corrective actions/ adopt appropriate mitigation measures to meet the requirements.	
PR7	Indigenous People						
	Not applicable						
PR8	Cultural Heritage						
8.1	The Project shall: a) Develop a and implement construction phase Cultural Heritage Management Plan (CHMP). The	Minimising risks to cultural heritage	EBRD PR 8 National legislation	Resources: MCI's and Contractor's internal resources	a) Prior to FC. b) Prior to start of construction activities	a) Construction phase CHMP. b) Organogram and reporting structure, job description; short profile or	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
	construction phase CHMP shall be incorporated into the CESMP (refer ESAP Action #1.5), with clear decision-making process and roles and responsibilities for all relevant stakeholders, and should include but not be limited to: i. A process for investigation of known cultural heritage sites likely to be affected by the Project and determine the detailed mitigation for the management of those sites using best available technique in compliance with PR8; ii. Timing for Administration for Protection of Cultural Heritage (APCH) pre-construction surveys and links to the Project programme; iii. Scope and techniques to be used in pre-construction surveys; iv. Scope and approach for archaeological supervision during construction activities within cultural heritage sites; v. Standards for protection of cultural heritage features within construction areas; vi. Protocol for recording the process demonstrating compliance with IPCM requirements and PS8 (including appropriate oversight by an appropriately experienced specialist); and vii. Notifications required throughout the cultural heritage management process: MONTEPUT EPC CONTRACTOR,APCM,EBRD, and others as appropriate; b) Appoint a dedicated archaeological supervisor to monitor earthworks activities; c) Develop and implement a Chance Find Procedure; and d) Develop and implement an operations phase CHMP and incorporate it into the OESMP (refer ESAP Action #6). The operations phase CHMP shall set out roles and responsibilities for management and monitoring of any impacts to cultural heritage sites associated with Project operations.			<i>Investment needs:</i> Contractual obligation of the Contractor <i>Responsibility: EPC Contractor</i>	within any cultural heritage or archaeological site. c) Prior to FC. d) Six (6) months prior to the start of operations.	curriculum vitae, and signed contract. c) Chance Find Procedure. d) Operations phase CHMP.	
PR10	Information Disclosure and Stakeholder Engagement						
10.1	The Project shall: Develop, update and implement the Stakeholder Engagement Plan (SEP) to ensure sufficient information about the risks and impacts arising from the Project are disclosed in a timely, inclusive and participatory manner to Project stakeholders	Participatory planning and implementation of the Project	EBRD PR 10	Resources: MONTEPUT internal resources Investment needs: MONTEOUT internal resources	Prior to FC	Target: Meaningful consultation and engagement of stakeholders Evaluation Criteria SEP adopted and approved by EBRD	

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Best Practice)	Resources, Investment Needs, Responsibility	Timetable	Target and Evaluation Criteria for Successful Implementation	Status
				Responsibility: MONTEPUT/PIU		Monitoring reports on implementation of SEP sent to EBRD	
10.2	The Project shall: a) Present and consult the local communities on the alignment route b) Present and consult the local communities on changes and modifications made to the alignment c) Hold structured meetings and keep written Minutes of meeting summarizing the main discussion and capturing objections raised d) Follow up on any concern raised during such meetings in line with the SEP timelines	Manage community expectations and ensured participatory design activities	EBRD PR 10 EBRD PR 1	<i>Resources:</i> MONTEPUT internal resources <i>Investment needs:</i> MONTEPUT internal resources <i>Responsibility:</i> MONTEPUT/PIU	a) By end of September 2024 b) By end of September 2024 c) In line with Project SEP	Target: Meaningful consultation and engagement of stakeholders Evaluation Criteria a) SEP adopted and approved by EBRD Monitoring reports on implementation of SEP sent to EBRD	
10.3	The Project shall: a) Establish, publicize, maintain, and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, b) The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.	Manage community risks and impacts	EBRD PR 10	<i>Resources:</i> MONTEPUT internal resources <i>Investment needs:</i> MONTEPUT internal resources <i>Responsibility:</i> MONTEPUT/PIU	a) Prior to FC b) Prior to FC	Target: Inform communities and public on the grievance mechanism Evaluation criteria: a) Grievance Mechanism established and evidence that grievances are being managed submitted to EBRD b) Grievance Mechanism equipped and staff trained to manage SEA/SH complaints	

