



Ministry of Agriculture, Forestry and Water Management

STAKEHOLDER ENGAGEMENT PLAN
agreed at Project Appraisal Stage

Prepared for the Project:

Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD)
Montenegro
Project No. P507698

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Executive Summary

Stakeholder Engagement Plan (SEP) Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD) – Montenegro

1. Introduction and Purpose of the SEP

The **Stakeholder Engagement Plan (SEP)** for the Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD) outlines the project's comprehensive strategy for transparent, inclusive, and participatory stakeholder engagement across all phases of implementation. The SEP has been prepared in compliance with national requirements and with the **World Bank's Environmental and Social Framework (ESF)**, particularly **Environmental and Social Standard (ESS) 10** on *Stakeholder Engagement and Information Disclosure*.

It ensures that all project-affected people (PAPs), interested parties (OIPs), and vulnerable groups have timely access to project information and meaningful opportunities to participate in decision-making. The SEP is a living document and will be updated periodically based on stakeholder feedback and evolving project needs.

2. Project Description

The CRFASD Project, implemented by the **Ministry of Agriculture, Forestry and Water Management (MAFWM)**, aims to enhance Montenegro's fisheries and agrifood sectors by promoting **climate resilience, improving infrastructure, and strengthening institutional capacities**.

The project has two major pillars:

- **Hard infrastructure investments** such as:
 - Construction of **Montenegro's first climate-resilient fishing port at Cape Đeran (Ulcinj)**.
 - Development of an **Animal By-Product (ABP) treatment facility in Nikšić**.
 - Rehabilitation of **Paying Agency Regional Offices in Bar and Nikšić**.
- **Soft institutional reforms** such as:
 - Strengthening food safety, fisheries management, and animal by-product systems.
 - Advancing EU compliance and improving rural service delivery.
 - Modernizing agricultural payment and traceability systems.

Geographic

While major investments are geographically concentrated in **Ulcinj, Bar, and Nikšić**, the Project is designed to have a **national-level impact**, especially through institutional reforms and the operation of the ABP facility, which will serve stakeholders countrywide.

3. Key Stakeholders Identified

The SEP identifies three main stakeholder categories:

Project-Affected Parties (PAPs):

- Small-scale fishers and fishing cooperatives in Ulcinj.
- Livestock farmers and agribusinesses in Nikšić and surrounding rural communities.
- Agrifood producers, cooperatives, rural SMEs.
- Women and youth entrepreneurs engaged in fisheries and agrifood value chains.
- Informal workers and seasonal vendors near project sites.

Other Interested Parties (OIPs):

- Government bodies (Directorate for Fisheries, Paying Agency, Authority for Food Safety, Veterinary and Phytosanitary Affairs).
- Local governments (Ulcinj, Bar, Nikšić).
- Environmental and fisheries NGOs (local and national level).
- Research and academic institutions.
- Media outlets (e.g., Radio Ulcinj, TV Teuta).

Vulnerable Groups:

- Women-headed households and women entrepreneurs.
- Roma and Egyptian (RE) communities.
- Persons with disabilities or low literacy.
- Informal fishers and low-income rural households.
- Youth not in employment, education, or training (NEETs).

Special Engagement Measures will be implemented to ensure the meaningful participation of vulnerable and disadvantaged groups.

4. Stakeholder Engagement Program

Stakeholder engagement activities will follow the Project's lifecycle phases:

- **Preparation Phase:** Early consultations; disclosure of safeguard documents (ESMF, SEP, LMP, ESCP); preliminary risk identification.
- **Implementation Phase:** early Consultations; disclosure on site specific ESIA, ESMP and RAP, Continuous consultation on, infrastructure works, policy reforms, and training activities.
- **Monitoring and Evaluation Phase:** Regular updates on environmental, social, and operational performance.
- **Closure Phase:** Final reporting on results, lessons learned, and sustainability planning.

A **differentiated approach** will be applied between:

- **Hard infrastructure components** (requiring formal ESIA/ESMP consultations).
- **Soft institutional reforms** (requiring participatory policy dialogue and capacity building workshops).

5. Information Disclosure Strategy

Hard Infrastructure Components:

- Disclosure of ESMF, SEP, ESCP, LMP, ESIA, and ESMPs, RAPs via:
 - Official websites (MAFWM, PMT, World Bank).
 - Printed copies at municipal offices (Ulcinj, Bar, Nikšić).
 - Media announcements (radio, newspapers).

- Visual/audio materials for low-literacy groups.
- Materials will be made available in **Montenegrin and English**, with **Albanian translations for Ulcinj** and **adapted outreach (Romani/verbal)** where Roma communities are present.
- Regular update on Infrastructure works and ESMP and RAP implementation through site information Desks and public consultations close to the work site.

Soft Institutional Components:

- Disclosure of draft policies, training guides, IACS system upgrades, and technical assistance materials through online platforms, extension centers, and targeted outreach to rural SMEs.

Special Disclosure for ABP Facility:

- An **awareness campaign** will precede the ESIA disclosure for the ABP facility.
- This campaign, **financed under MIDAS2 (Component 2.2)** and provided **free of charge**, will:
 - Educate rural communities about ABP management benefits.
 - Clarify health, environmental, and odor management measures to the neighboring community.
 - Build trust and address concerns early.
- Communication channels will include mobile units, community meetings, printed leaflets, radio broadcasts, and verbal materials.

6. Grievance Redress Mechanism (GRM)

A robust and inclusive GRM will be established based on MIDAS2 experience and adapted to CRFASD needs:

- Multiple grievance submission options (online, phone, in-person, SMS, social media).
- Municipal drop-boxes for written grievances.
- Site Information desks
- Special protocols for vulnerable groups and Gender-Based Violence (GBV)/SEA/SH issues.
- Grievance acknowledgment within **3 working days**; resolution targeted within **5–10 working days**.
- Regular public reporting on grievance trends and resolutions.

7. Environmental and Social Risk Management

Environmental and Social (E&S) risk management will be led by the **PMT** established under the Ministry of Agriculture, Forestry and Water Management (MAFWM), reinforced with technical expertise.

The existing PMT staff from the MIDAS2 Project will have their technical capacities strengthened through the addition of new personnel, in order to effectively lead the implementation of the CRFASD Project. The PMT will be composed of the following staff:

- Project Manager
- Civil Engineer (part time supervisor)
- Civil Engineer (full time)
- ESF Specialist (part time supervisor)
- Social Development Specialist (full time)
- Monitoring and Evaluation Specialist
- ABP specialist.

These staff members will ensure:

- Full implementation of safeguard instruments (ESMF, SEP, LMP, ESCP).
- Oversight of contractor E&S compliance and Occupational Health and Safety (OHS) measures.
- Monitoring of social inclusion, gender mainstreaming, and grievance management.

8. Special Measures for Vulnerable Groups

To prevent exclusion, the SEP includes targeted outreach strategies:

- Use of accessible formats (infographics, audio messages, simplified leaflets).
- Culturally sensitive consultations for Roma communities.
- Gender-responsive consultation sessions with women.
- Mobile outreach and home visits for elderly or isolated populations.
- Engagement of CSOs for outreach to disadvantaged groups.

Participation by vulnerable groups will be systematically monitored using gender- and vulnerability-disaggregated indicators.

9. Conclusion

The CRFASD SEP presents a clear and operational framework to ensure **inclusive, transparent, and accountable** stakeholder engagement throughout the project. It supports the project's environmental, social, and economic goals, strengthens social sustainability, and builds resilient partnerships with communities, civil society, and public institutions across Montenegro.

Through continuous disclosure, meaningful dialogue, grievance management, and adaptive learning, the CRFASD Project aims to foster ownership, enhance project outcomes, and promote equitable development in the fisheries and agrifood sectors.

1. Introduction¹

Montenegro's fisheries and agrifood sectors are essential to its rural and coastal economy, food security, and sustainable livelihoods. These sectors contribute significantly to employment, income generation, and the provision of safe and nutritious food—especially in regions where alternative economic opportunities are limited. However, the sectors face systemic constraints, including limited competitiveness, outdated infrastructure, fragmented value chains, weak public service delivery, and increased vulnerability to climate change.

To address these challenges and advance progress toward European Union (EU) accession, the Government of Montenegro, with support from the World Bank, is preparing the Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD). This new operation builds on the achievements of the Montenegro Institutional Development and Agriculture Strengthening (MIDAS) and MIDAS2 projects, which laid the groundwork for EU-aligned institutional frameworks such as the Paying Agency (PA) and the Integrated Administration and Control System (IACS). MIDAS2 has also financed key upstream investments for CRFASD, including technical studies, detailed designs, and environmental and social due diligence for priority investments.

The CRFASD will scale up and consolidate these achievements by financing investments across **three interlinked components**, including both infrastructure (hard) investments and institutional (soft) support:

- **Component 1:** Construction of a climate-resilient Fishing Port in Ulcinj and capacity building for the Directorate of Fisheries, supporting the closing benchmarks for Chapter 13 (Fisheries) of the EU Acquis.
- **Component 2:** Establishment of a fully compliant Animal By-Products (ABP) management system and strengthening of the PA, directly supporting the closing benchmarks of Chapters 11 and 12.
- **Component 3:** Project management and implementation support, including fiduciary oversight, safeguards, monitoring and evaluation, citizen engagement, and integration of climate and gender considerations.

The total project financing amounts to **EUR 33 million (US\$ 37.5 million equivalent)** and will be implemented during the period **2026–2030**. The CRFASD is fully aligned with Montenegro's national development strategies and EU pre-accession priorities, including the **Strategy for Agriculture and Rural Development (2023–2028)**, the **Fisheries Strategy and Action Plan (2024–2029)**, and the **National Strategy for Sustainable Development until 2030**. It also contributes to Montenegro's international commitments under the **Paris Agreement** and the **EU Green Agenda for the Western Balkans**, by enhancing climate resilience and reducing environmental risks—especially through improved ABP management and sustainable fisheries infrastructure.

Inclusive, transparent, and context-sensitive stakeholder engagement is a foundational principle of the CRFASD Project. While interventions will be concentrated particularly in the municipalities where investments will take place — such as Ulcinj, Nikšić, and Bar — access to the improved services and facilities, especially the Animal By-Products (ABP) facility, will be available at the national level. In this context, the Stakeholder Engagement Plan (SEP) serves as a core tool to guide the systematic identification, consultation, and ongoing engagement of all stakeholders, including those who are vulnerable, geographically remote, economically marginalized, or at risk of exclusion.

The project is being prepared and will be implemented in accordance with the World Bank's Environmental and Social Framework (ESF)², with the SEP aligned with the requirements of Environmental and Social Standard 10 (ESS10):

¹ The project description has been prepared based on the Project Appraisal Document (PAD), which will be officially disclosed and made publicly available on the official website of the Ministry of Agriculture, Forestry and Water Management of Montenegro (<https://www.gov.me/mpsv>).

² The World Bank's Environmental and Social Framework (ESF) outlines the environmental and social standards for projects financed by the Bank. It was adopted in 2018. More information is available at: <https://www.worldbank.org/en/projects-operations/environmental-and-social-framework>.

Stakeholder Engagement and Information Disclosure.

1.1 Objective / Description of the SEP

The Stakeholder Engagement Plan (SEP) for the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project provides a structured and inclusive framework to identify, engage, and maintain open communication with stakeholders throughout the project lifecycle. Developed in accordance with the World Bank Environmental and Social Standard 10 (ESS10), the SEP ensures that the views, needs, and concerns of all project-affected and interested parties—particularly disadvantaged and vulnerable groups—are meaningfully integrated into project planning, decision-making, and implementation.

Given the dual nature of the CRFASD — which includes infrastructure (hard) investments, such as the construction of the Fishing Port in Ulcinj, regional Paying Agency offices in Nikšić and Bar, and the Animal By-Product (ABP) facility, as well as institutional (soft) investments including technical assistance, capacity building, and policy and regulatory development — this SEP differentiates stakeholder engagement strategies based on the type of intervention and the profile of stakeholders involved.

In relation to the ABP facility, while Nikšić is latest considered location, the final site selection remains pending. Therefore, the Stakeholder Engagement Program will ensure inclusive, transparent, and participatory decision-making processes in the event that alternative locations are considered during implementation. Meaningful consultation and early engagement with affected communities, local authorities, and other relevant stakeholders will be conducted to support informed site selection, in line with the requirements of the Environmental and Social Management Framework (ESMF) and Environmental and Social Standard 10 (ESS10).

To ensure equity and inclusiveness throughout implementation, the SEP adopts a structured and differentiated approach to engaging disadvantaged and vulnerable groups, in line with World Bank Environmental and Social Standard 10 (ESS10). This classification allows for targeted engagement strategies that respond to the nature and severity of barriers faced by various segments of the population.

- **Group 1: Direct Project Beneficiaries Facing Barriers to Participation** – This category includes individuals and communities expected to directly benefit from CRFASD activities but who may experience participation constraints due to social, economic, geographic, gender-based, or cultural factors. Examples include women engaged in fisheries or food processing, youth in remote coastal communities, small-scale producers with limited access to institutional support and information, and informal fishers who currently operate outside formal regulatory frameworks and may face challenges in accessing the benefits associated with CRFASD-supported efforts to formalize fisheries management, including official registration, improved market access, and eligibility for institutional support.
- **Group 2: Broader Vulnerable or Disadvantaged Populations** – This category includes individuals or groups who may not be direct beneficiaries of CRFASD activities but who could be at risk of marginalization, exclusion from consultation processes, or disproportionate impacts from project implementation. Examples include persons with disabilities, elderly individuals in isolated rural areas, Roma communities (notably identified in Nikšić, where they represent a well-established community), and linguistically or culturally marginalized groups.

Differentiated engagement strategies will be designed for each group based on specific barriers and needs. These may include door-to-door outreach, mobile consultation units, simplified and visual information materials, and collaboration with local NGOs or facilitators to promote inclusive participation and feedback. Particular care will be taken to ensure accessibility of formats and venues, and to ensure gender-sensitive engagement that addresses the distinct needs of women and girls.

Grievance Redress Mechanism (GRM):

In line with the World Bank's Environmental and Social Standard 10 (ESS10), the Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD) will establish a practical, functional, and fit-for-purpose Grievance Redress Mechanism (GRM) to allow project-affected persons and other stakeholders—including vulnerable groups—to safely and effectively submit concerns or complaints related to project activities.

Ultimate responsibility for the management, coordination, and oversight of the GRM will lie with the Project Management Team (PMT) under the Ministry of Agriculture, Forestry and Water Management (MAFWM).

The GRM will operate at two levels:

Central level: The PMT will maintain and manage the central GRM database, oversee complaint resolution processes, ensure compliance with timelines, and produce periodic reports.

Local level: Designated municipal focal points in participating municipalities (e.g., Ulcinj, Nikšić, Bar) will serve as first points of intake for grievances. They will register complaints, provide basic feedback, and liaise with the PMT for resolution.

Accountability:

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

Core Design Principles:

The GRM will be practical and tailored to Montenegro's institutional context, and will prioritize:

- **Accessibility:** Multiple channels for submitting complaints (e.g., in-person, email, hotline, postal mail) in local language(s), including simplified procedures for vulnerable groups.
- **Predictability:** Clear procedures and indicative timelines for acknowledgment (within 5 working days) and resolution (within 30 working days).
- **Confidentiality:** Respect for complainants' privacy and secure handling of sensitive data.
- **Transparency:** Stakeholders will be informed of GRM procedures and rights through public communications at project sites and online.
- **Fairness and Impartiality:** Complaints will be processed objectively, with no retaliation against complainants.

Special Procedures:

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

Closing the Feedback Loop:

- The PMT will ensure that all complainants receive timely feedback on the status and outcome of their grievance.
- Wherever possible, complainants will be invited to confirm their satisfaction with the resolution process.
- Unresolved grievances will be documented along with reasons and will inform corrective actions and institutional learning.

Awareness and Capacity-Building:

- Awareness-raising campaigns will be conducted during project launch and periodically thereafter, especially in project-affected communities.
- Simple, easy-to-understand information materials will be produced.
- Capacity-building will be provided to all GRM focal points to ensure consistent application of procedures.

Monitoring and Reporting:

The GRM system will be subject to regular internal reviews by the PMT, and lessons learned will be integrated into ongoing project management improvements.

By establishing a clear, proportionate, and accountable GRM structure, the CRFASD Project will promote transparency, citizen engagement, and equitable access to recourse mechanisms, supporting both environmental and social sustainability and Montenegro's broader EU integration process.

Implementation Arrangements for SEP Delivery

The PMT will oversee all SEP-related activities, including stakeholder consultations, information disclosure, grievance redress mechanisms, and monitoring of engagement processes. It will work in close collaboration with key MAFWM departments—such as the Directorate for Fisheries (DfF), the Paying Agency (PA), and the Authority for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA)—each taking part in stakeholder engagement activities within their respective mandates and geographic areas, under the overall coordination and accountability of the PMT.

At the local level, municipal governments in Ulcinj, Nikšić, and Bar—where project activities are concentrated—will support SEP delivery by facilitating local outreach, community consultations, and operationalizing local-level grievance redress channels.

Additionally, two technical Working Groups (WGs) will be established for the Ulcinj fishing port and Nikšić ABP facility components. These WGs will serve as platforms for ongoing stakeholder dialogue and technical coordination between national agencies, local governments, and community representatives throughout project implementation.

These arrangements ensure that stakeholder engagement is fully integrated into the project's governance structure, enabling timely, inclusive, and responsive communication with all relevant actors across all levels.

1.2 Project Description

The project development objective (PDO) is to strengthen Montenegro's public institutions in the fisheries and agrifood sector for improved service delivery and readiness for EU accession.

Progress toward the PDO will be measured through the following indicators:

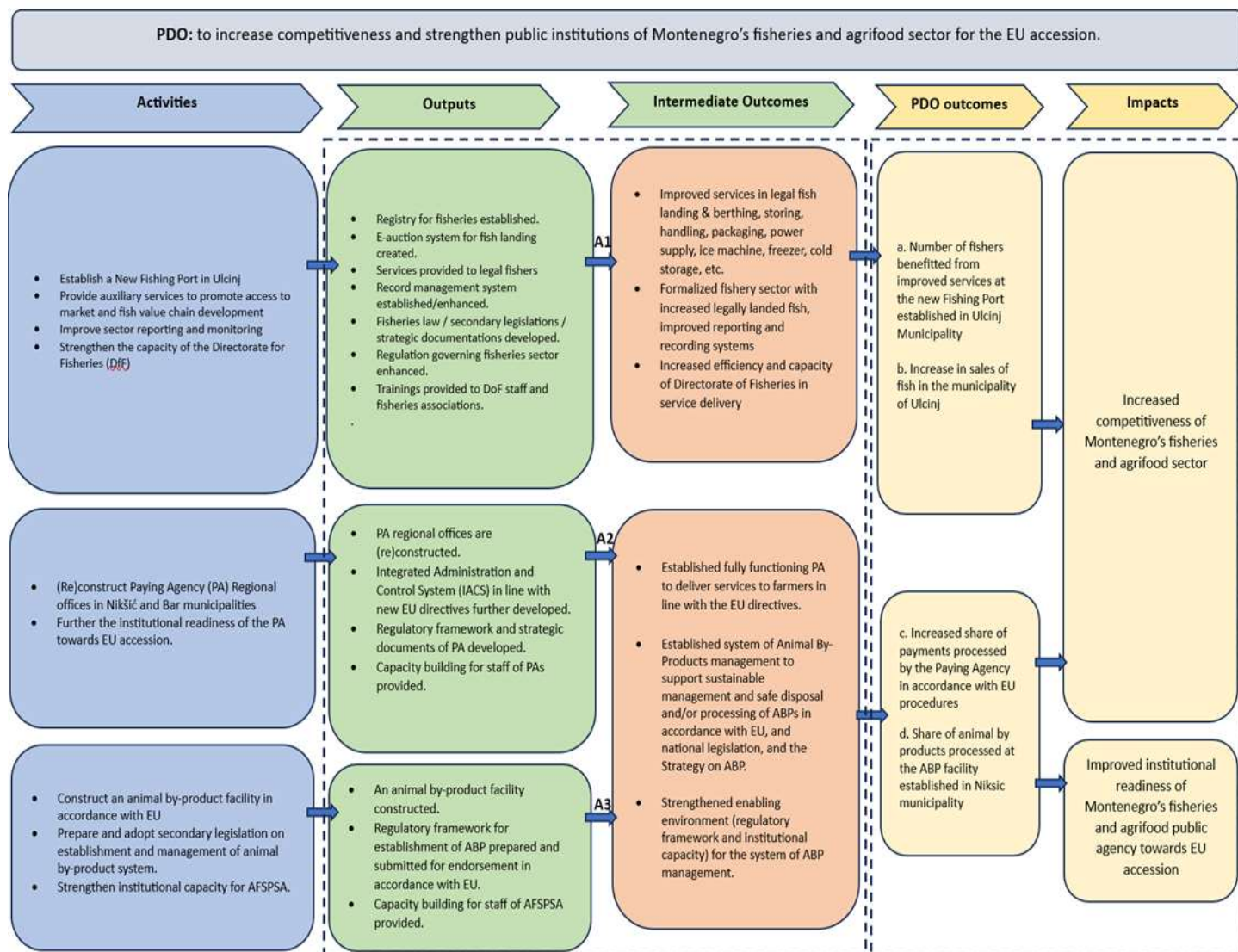
- (a) PDO Indicator 1: Fishers reached with improved services³ at the new FP established in Ulcinj municipality (Male/Female fishers, Number).
- (b) PDO Indicator 2: Increased share of payments processed by the PA in accordance with EU procedures (percentage)
- (c) PDO Indicator 3: Quantity of animal by-products processed at the ABP facility established in Niksic municipality (ton).

Disclaimer: *The Project Development Objective (PDO), project components, and site selections described herein are based on the information available at the time of preparation of this document. Final design elements are still*

³These are services offered to fishers to effectively put good on-board handling practices that maintain quality and reduce waste into place, including legal fish landing & berthing, storing, handling, packaging, power supply, ice machine, freezer, cold storage.

under refinement between the Government of Montenegro and the World Bank Task Team. Adjustments may occur before the Project's appraisal and formal approval.

Theory of Change:



Project Components

The CRFASD has two technical components and a project management component. The two technical components are designed to meet the EU accession requirements concerning Chapter 13 (Component 1) and Chapters 11 and 12 (Component 2) for prospective EU membership.

These components comprises both hard investments (infrastructure, construction works and procurement of goods) and soft investments (institutional strengthening, technical assistance, and capacity building), promoting a climate-resilient, inclusive, and EU-compliant transformation of the sector.

Component 1: Fisheries Development and Institutional Readiness for EU Accession under Chapter 13 (EUR 15.25M)

Objective:

The objective of this component is to enhance climate resilience and boost productive capacity of the fisheries sector by investing in climate resilient fisheries infrastructure development, and administrative and service delivery capacity development of the DfF for improved and climate resilient service delivery. The component has two sub-components.

Subcomponent 1.1: Climate Resilient Fisheries infrastructure development (EUR 14.72 million).

Objective:

The objective of this sub-component is to support the establishment of a climate resilient FP, and to build the capacity of fishers using the FP to enhance value addition and improve market access. The sub-component will finance the following interventions: .

- **Hard Investments:**

- **Construction of a climate-resilient Fishing Port at Cape Đeran–Velika Plaža, Ulcinj.**
- **Development of auxiliary port infrastructure, including:**
 - Cold storage facilities (including Freezers and packaging units)
 - Hygienic fish landing and handling platforms
 - Ice production equipment
 - Boat maintenance and mooring infrastructure
 - Power supply infrastructure – The port is expected to include dedicated power supply as part of its essential services.
- **Civil works designed and implemented in compliance with Montenegrin port regulations and international climate-resilient standards, incorporating:**
 - Marine-grade concrete and corrosion-resistant materials
 - Fire suppression systems
 - Fender systems and structural safeguards against coastal hazards

- **Soft Investments:**

- **Technical Assistance (TA) for:**
 - Construction supervision
 - Development and implementation of a port Operations & Maintenance (O&M) model
- **Capacity building for fishers, including training on:**
 - Post-harvest fish handling and quality preservation
 - Adaptation to extreme climate events
 - Hygiene standards
 - Waste reduction and food loss minimization
 - Market access and climate-adapted marketing strategies
- **Gender-inclusive engagement and empowerment, including:**
 - Consultations and targeted training for women involved in fish processing and marketing
 - Promotion of women's representation in port governance and management structures
 - Institutional coordination with Ulcinj Municipality and monitoring of related infrastructure (e.g., access road)

Subcomponent 1.2: Strengthening DfF's capacity for EU compliance (EUR 0.53 million).

Objective: To build the capacity of the DfF for enhanced and improved service delivery compliant with EU requirements. The support provided by sub-component will improve the DfF's capacity, including administration, inspection, and control capacities required by the CFP contributing to one closing benchmark of Chapter 13. The sub-component will finance two distinct interventions to support the DfF: (a) strengthening fisheries management for CFP compliance, and (b) strategic support to improve the functioning of DfF.

- **Hard Investments:**

- **Procurement of essential equipment for the Directorate for Fisheries (DfF), including:**
 - Vehicles for fisheries inspectors to improve field-based inspection and control capacity
 - Office and IT equipment to support administration, data processing, and compliance monitoring
- **Soft Investments:**
 - **Development of policy and regulatory instruments, including:**
 - Strategic documents, secondary legislation, and by-laws aligned with the EU Common Fisheries Policy (CFP)
 - Technical inputs from fisheries associations, climate experts, and gender specialists
 - **Support to sector monitoring and evaluation, including:**
 - Mid-term and final evaluations of the Fisheries Sector Development Strategy and Action Plan
 - **Capacity building and training programs for DfF staff and fisheries inspectors, covering:**
 - EU regulatory compliance and inspection standards
 - Climate science and tools for modeling climate impacts on fisheries
 - CPUE tracking methods to support evidence-based management
 - **Support to fishermen's associations in applying CFP regulations and improving access to formal markets**
 - **Gender-responsive training design and delivery, incorporating:**
 - Flexible, hybrid (in-person and online) formats
 - Scheduling adjustments and logistical support to enhance participation of female staff
 - Childcare and travel support measures where relevant
 - **Digitalization and upgrading of the fishers' registry and record management system, enabling:**
 - Accurate documentation of fishing activities
 - Alignment with EU requirements on Illegal, Unreported, and Unregulated (IUU) fishing
 - Improved monitoring of catch and fishing effort data (e.g., CPUE – Catch Per Unit Effort)

Component 2: Institutional Readiness for Fulfilling EU Accession Requirements of Chapters 11 and 12 (EUR 16.70 million).

Objective: Component 2 aims to enhance Montenegro's institutional readiness to meet EU accession requirements under Chapters 11 and 12 by supporting the implementation of agriculture, rural development, and food safety programs. It also seeks to reduce methane emissions, strengthen climate resilience of key infrastructure, and promote gender-inclusive access to payment services and resources.

Subcomponent 2.1: Supporting the establishment of a fully functional Paying Agency (EUR 7.70 million).

Objective: Sub-component 2.1 aims to support the full operationalization and accreditation of a fully functional Paying Agency (PA) in compliance with EU Chapter 11 requirements. It focuses on expanding the regional outreach of the PA through the construction and equipping of new regional offices (PAROs), strengthening the Integrated Administration and Control System (IACS), enhancing the regulatory and strategic framework, and building institutional capacity through inclusive and gender-responsive training. The sub-component also promotes climate-resilient and universally accessible infrastructure to ensure equitable service delivery and institutional sustainability.

- **Hard Investments:**
 - Construction of two new PA Regional Offices (PAROs) in Nikšić and Bar, incorporating climate-resilient design and universal accessibility
 - Procurement of ICT systems, furniture, and equipment

- **Soft Investments:**

- Upgrade and integration of the Integrated Administration and Control System (IACS)
- Development of regulatory framework and strategic documentation
- Capacity building for MAFWM and PA staff, with gender-responsive support
- Implementation of the rural measures action plan and PA/IACS accreditation

Subcomponent 2.2: Supporting the establishment of a system of management and safe disposal of Animal By-products (EUR 9.00 million).

Objective: To support the Government of Montenegro in establishing a sustainable, EU-aligned system for the safe management, disposal, and processing of Animal By-Products (ABPs), in line with national legislation and the Strategy on ABPs. The sub-component aims to strengthen institutional capacity, reduce environmental and health risks, minimize methane emissions, and enable future private sector engagement in line with EU Chapter 12 requirements on Food Safety, Veterinary, and Phytosanitary Services.

- **Hard Investments:**

- **Construction of a climate-resilient Animal By-Products (ABP) facility in Nikšić,** designed with elevated critical infrastructure (e.g., electrical systems, processing and cooling units) to ensure operational continuity during extreme weather events and natural disasters.
- **Procurement of equipment and infrastructure, including:**
- Energy-efficient machinery and specialized transport vehicles for safe ABP collection and disposal
- ICT infrastructure and digital control systems to support traceability and data reporting

- **Soft Investments:**

- Harmonization of national ABP legislation and operational procedures with EU directives and international best practices
- Technical assistance (TA) for establishing official veterinary and food safety control systems for animal and plant products in compliance with Chapter 12 of the EU acquis
- Capacity building and knowledge transfer for AFSVPA staff (biosafety, traceability)
- Development and implementation of livestock traceability and ABP tracking registers
- Public awareness and outreach: Nationwide awareness campaign (prepared under MIDAS2) to promote safe ABP management, environmental and public health protection, and compliance with food safety regulations
- **Cross-cutting outcomes:**
- Significant contribution to methane emissions reduction by diverting organic animal waste from informal and environmentally harmful disposal practices
- Enhanced food safety and public health outcomes through regulated ABP handling and disposal
- Creation of private sector opportunities for investment in ABP reuse, valorization, and circular economy approaches
- Alignment with EU Food Safety, Veterinary, and Waste Management Directives, supporting Montenegro's Chapter 12 accession readiness

Component 3: Project Management (EUR 1,05 million)

Objective: To ensure effective, efficient, and timely implementation of the CRFASD Project through strengthened project management, coordination, staffing, fiduciary oversight, ESF and climate compliance, and inclusive monitoring systems.

Scope of Activities

- **Soft Investments:**
 - Strengthening of the existing PMT structure with a full-time Social Development Specialist, a full-time Civil Engineer (Structural Engineer), to support infrastructure-related supervision, a full-time ABP Specialist.
 - Daily project coordination, procurement and financial oversight
 - Monitoring and Evaluation system development, including tracking climate, gender, and emissions outcomes
 - Technical support through consultancies, training, and learning for project staff
 - Operation of a Grievance Redress Mechanism (GRM)
 - Citizen engagement and public communication activities
- **Hard Investments:**
 - None (all investments under this component are classified as soft)

Cross-cutting outcomes:

- Enhanced institutional coordination and transparency
- Strengthened environmental and social compliance

Monitoring of project results, including gender equality, community feedback, and climate adaptation

Table 1: CRFADS Project Components

Component	Subcomponent (Objective)	Hard Investments	Soft Investments
Component 1: Fisheries Development and Institutional Readiness for EU Accession under Chapter 13 (EUR 15.15M)	1.1 Climate Resilient Fisheries Infrastructure Development <i>Support the establishment of a climate-resilient fishing port and capacity building for fishers</i>	<ul style="list-style-type: none"> - Construction of fishing port at Cape Đeran–Velika Plaža, Ulcinj - Auxiliary infrastructure: cold storage, hygienic platforms, ice equipment, boat maintenance, power supply - Climate-resilient civil works (marine-grade concrete, corrosion resistance, fender systems) 	<ul style="list-style-type: none"> - TA for construction supervision and O&M model - Training for fishers on post-harvest handling, climate adaptation, hygiene, waste reduction - Market strategies and gender-inclusive training - Institutional coordination with Ulcinj Municipality
	1.2 Strengthening DfF's Capacity for EU Compliance <i>Improve DfF's administrative and control capacities for alignment with CFP</i>	<ul style="list-style-type: none"> - Procurement of vehicles, IT and office equipment - Digitalization of fishers' registry and catch monitoring system 	<ul style="list-style-type: none"> - Development of CFP-aligned legislation and by-laws - Mid-term/final strategy evaluations - Capacity building for DfF inspectors on EU compliance, climate science, CPUE

			<p>methods</p> <ul style="list-style-type: none"> - Gender-sensitive training and support for fisher associations
<p>Component 2: Institutional Readiness for EU Accession under Chapters 11 & 12 (EUR 16.00M)</p>	<p>2.1 Supporting a Fully Functional Paying Agency (PA) <i>Operationalize the PA and ensure compliance with CAP payment systems</i></p>	<ul style="list-style-type: none"> - Construction of PAROs in Nikšić and Bar with climate-resilient and accessible design - Procurement of ICT systems, furniture, and equipment 	<ul style="list-style-type: none"> - Upgrade and integration of IACS - Development of regulatory/strategic documents - Capacity building for MAFWM/PA staff with gender-responsive design - Implementation of rural measures action plan and PA/IACS accreditation
	<p>2.2 Animal By-Product (ABP) Management System <i>Establish EU-compliant system for ABP disposal, improve public health and reduce methane</i></p>	<ul style="list-style-type: none"> - Construction of ABP facility in with disaster-resilient design - Procurement of energy-efficient equipment, specialized vehicles, and ICT systems 	<ul style="list-style-type: none"> - Harmonization of ABP legislation with EU directives - TA for veterinary/food safety control systems - Capacity building for AFSVPA staff - Livestock tracking registers - Public awareness campaign
<p>Component 3: Project Management (EUR 1.00M)</p>	<p><i>Ensure efficient implementation, M&E, fiduciary, ESF and gender compliance</i></p>	<p>- None (all soft investments)</p>	<ul style="list-style-type: none"> - Staffing: Social Development Specialist, Civil Engineer, ABP Specialist, Gender Expert - Daily project coordination, procurement, FM oversight - M&E system including gender/climate tracking - GRM operation and citizen engagement - Training, consultancies, learning activities

Project Beneficiaries

The Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD) is designed to deliver comprehensive benefits to a diverse set of stakeholders across Montenegro. The primary geographic focus includes the coastal and central-northern municipalities of Ulcinj, Bar, and Nikšić, but the institutional reforms and environmental improvements are expected to generate broader impacts nationwide.

Stakeholders involved in the project can be categorized into three groups: Project-Affected Parties (PAPs), Other Interested Parties (OIPs), and vulnerable or disadvantaged groups. The project places strong emphasis on the inclusion and support of disadvantaged and vulnerable groups, in alignment with the World Bank's Environmental and Social Framework (ESF) and Gender Strategy.

➤ Primary Direct Beneficiaries (Project-Affected Parties - PAPs)

Small-Scale Fishers and Fisheries Associations

- Small-scale fishers and fisheries associations (including both formally registered and informal fishers), particularly those based in Ulcinj Municipality, will be key beneficiaries of the CRFASD Project through the construction of Montenegro's first climate-resilient fishing port at Cape Đeran. The new facility will provide regulated access to modernized landing sites, hygienic cold storage, ice production units, and essential services for vessel and gear maintenance. These investments aim to enhance occupational safety, raise hygiene standards, improve the marketability of fish products, and significantly reduce post-harvest losses, thereby increasing income opportunities for fishers. Special attention will be given to supporting the integration of informal fishers into formal market and regulatory structures through targeted outreach, technical assistance, and capacity-building activities. The facility will also contribute to climate resilience by incorporating environmentally sustainable infrastructure and operational practices, aligning with EU fisheries standards and supporting long-term sectoral development.

Livestock Farmers and Agrifood Enterprises

- Livestock farmers and agrifood enterprises, particularly those based in Nikšić and surrounding municipalities, will be among the key beneficiaries of the new national Animal By-Product (ABP) treatment facility to be constructed under the CRFASD Project. The ABP facility will support the safe, environmentally sustainable, and EU-compliant management of animal by-products, including carcasses, slaughterhouse waste, and materials not intended for human consumption. Access to the facility will be available nationwide, enabling livestock producers across Montenegro to safely dispose of animal by-products, thereby reducing illegal dumping, mitigating public and animal health risks, and supporting improved biosecurity. The facility will also be designed with climate-resilient features to ensure continuity of operations during extreme weather events. Over time, the ABP facility is expected to contribute to circular economy development by exploring opportunities for safe recycling and reuse of treated by-products. Complementary technical assistance will strengthen institutional capacity for ABP management, regulatory alignment with EU standards, and operational control systems, particularly within the Administration for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA). Local Agribusinesses, Cooperatives, and Producer
- **Organizations**
Operating in Bar and adjacent municipalities, these actors will gain from enhanced access to Paying Agency Regional Offices (PAROs), rural development funds, and institutional support aimed at improving compliance, service delivery, and market linkages.
- **Women and Youth Entrepreneurs**
The CRFASD Project will support women and youth entrepreneurs through targeted capacity-building activities, technical assistance, and training programs, particularly in areas such as post-harvest handling, processing, marketing, and agrifood value chain development.

Institutional Beneficiaries (Other Interested Parties - OIPs)

Several government institutions will be supported to strengthen service delivery, enhance compliance, and align with EU accession benchmarks, particularly under Chapters 11 (Agriculture), 12 (Food Safety), and 13 (Fisheries and Maritime Policy). These include:

- Ministry of Agriculture, Forestry and Water Management (MAFWM), including:
 - Directorate for Payments (DfP) – administering direct payments and support to producers;
 - Directorate for Fisheries (DfF) – leading fisheries policy, catch traceability, and registry creation;
 - Administration for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA) – responsible for disease surveillance, ABP management, and compliance with EU food safety regulations.

These institutions will benefit from IT systems development, technical assistance, equipment upgrades, and staff training, improving institutional readiness and service delivery capacities.

Indirect and Environmental Beneficiaries

- **Tourism-Dependent Enterprises (HoRACs)**
Hotels, restaurants, and cafés, particularly along the coast, are expected to benefit indirectly from improved waste management, environmental safeguards, and cleaner port environments, contributing to enhanced visitor appeal and tourism sector growth.
- **General Population and Visitors**
Citizens and tourists alike will benefit from cleaner coastal areas, reduced illegal dumping of ABPs, improved food safety practices, and more resilient value chains across Montenegro.

Social Inclusion and Vulnerable Groups

In line with the World Bank's ESS10 and Gender Strategy (2024–2030), the CRFASD project embeds inclusive measures across all components:

- Women's participation will be promoted in infrastructure planning, port management committees, and training schemes.
- Women-led agrifood and fisheries businesses will receive support through tailored technical assistance, training opportunities, simplified registration processes, and advisory services.
- Youth, Roma communities, informal fishers, and persons with disabilities or low literacy will be engaged through culturally adapted outreach, mobile consultations, and partnerships with civil society organizations, using communication methods tailored to their skills, IT literacy levels, and access to technology.
- The SEP includes specific engagement mechanisms for vulnerable groups, with their participation tracked via disaggregated monitoring indicators.

2. Potential Social and Environmental Impacts and Risk

The CRFASD project has been screened under the World Bank's Environmental and Social Framework (ESF), and the overall environmental and social (E&S) risk rating is assessed as **Substantial**. This reflects the nature, scale, and sensitivity of the planned infrastructure investments and institutional reforms, as well as the capacity of implementing agencies and the environmental and social context in which the project operates.

The project includes the construction of Montenegro's first climate-resilient fishing port in Ulcinj, a national animal by-product (ABP) facility, and construction/ rehabilitation of Paying Agency Regional Offices in Nikšić and Bar. These civil works and associated operational activities are expected to generate a range of E&S risks and impacts, including but not limited to:

- **Construction-phase risks:** Noise, dust, vibration, traffic disruptions, marine habitat degradation, and management of dredged materials (particularly in Ulcinj port construction), including potential health risks to workers and communities from contaminated sediments, hazardous materials exposure, and improper disposal. Additional risks include occupational health and safety (OHS) hazards, influx of labor, and construction-related waste.
- **Operation-phase risks:** At the ABP facility, these include wastewater discharge, pathogen exposure, odor generation, methane emissions, and risks associated with improper handling and processing of animal waste. The fishing port may also pose risks related to port traffic, fuel spills, and marine biodiversity degradation if not properly mitigated.
 - **Land acquisition** is not directly anticipated under the CRFASD Project, as all infrastructure investments, including the construction of the Fishing Port and ABP facility, are planned on state-owned land. However, the final site for the ABP facility has not yet been officially confirmed. In addition, the need for associated facilities—such as access roads, utility connections, and auxiliary infrastructure—may give rise to unforeseen impacts. These may include temporary access restrictions, potential displacement of informal users, or adverse effects on livelihoods during construction. To address any such risks in line with ESS5: Land Acquisition, Restrictions on Land Use and Involuntary Resettlement, a dedicated Resettlement Policy framework (RPF) is being developed.

The RPF will form part of the overall ESF package and serve as a guiding framework for identifying, assessing, and mitigating land-related ESS5 impacts throughout project implementation including those associated with linked or ancillary facilities.

- **Biodiversity and cultural heritage:** Though not expected to affect designated sensitive habitats or heritage sites, all activities involving earthworks and marine operations will apply chance finds procedures and follow applicable biodiversity protection protocols under ESS6 and ESS8.
- **Inclusion risks:** There is a risk of excluding vulnerable groups (e.g., women, youth, Roma communities, persons with disabilities) from access to project benefits, services, and consultations. If unaddressed, this could exacerbate existing inequalities in the fisheries and agrifood sectors.

To address the above risks, the following environmental and social risk management measures will be implemented:

- **Exclusion list and Screening procedures** for technical assistance and institutional activities to avoid downstream E&S risks
- **Environmental and Social Assessment (ESIA)** and site-specific **Environmental and Social Management Plans (ESMPs)** will be prepared for all infrastructure works, in line with ESS1 and Montenegrin law. These instruments will define mitigation measures, monitoring protocols, and institutional responsibilities.
- **Labor Management Procedures (LMPs)** will guide the treatment of all project workers—direct, contracted, and community-based. These will include OHS standards, codes of conduct, grievance mechanisms, and protocols for preventing child or forced labor in line with ESS2.
- **Community Health and Safety (CHS) protocols** will be incorporated into ESMPs to manage traffic safety, communicable disease risks, site security, and safe materials handling, following ESS4.
- **Waste and pollution control measures (ESS3)** will be applied to reduce emissions, improve wastewater treatment, and ensure safe handling of hazardous substances, especially at the ABP facility and during port construction.
- **Stakeholder Engagement Plan (SEP)** will ensure continuous, inclusive, and gender-responsive consultations throughout the project lifecycle, in line with ESS10. Mechanisms such as town halls, CSO coordination, online portals, and media campaigns will facilitate transparency and accountability.
- **Grievance Redress Mechanism (GRM):** A project-level GRM, adapted from the MIDAS2 model, will be established and enhanced into a broader **Beneficiary Feedback Mechanism (BFM)**. It will handle complaints from local communities, laborers, and other stakeholders.
- **SEA/SH Risk Mitigation:** Although SEA/SH risk is assessed as Low, project-specific prevention protocols—including worker training, codes of conduct, and female focal points—will be put in place, aligned with ESS2 and ESS4.
- **Climate Resilience:** All infrastructure will incorporate low-carbon, climate-resilient design standards such as elevation, reinforced structures, and energy-efficient systems (e.g., LED lighting, HVAC upgrades), supporting adaptation under the Paris Agreement and aligned with ESS3 and ESS6.

Table 3: Identification of Relevant Environmental and Social Standards (ESS) to CRFASD Project Components

Applicable Standard	Relevance to Project Activities
ESS1: Assessment and Management of Environmental and Social Risks and Impacts	Applies to all project components involving infrastructure (e.g., fishing port in Ulcinj, ABP facility, PA Regional Offices in Bar and Nikšić) and institutional reforms. Comprehensive ESIAs and ESMPs will be prepared to assess and mitigate risks across Components 1, 2, and 3.
ESS2: Labor and Working Conditions	Relevant for Components 1 and 2 where direct and contracted workers will be engaged in construction of the fishing port, ABP facility, and PA offices. Also applies to PMT staff and consultants under Component 3. Labor Management Procedures (LMP) will ensure fair and safe working conditions.
ESS3: Resource Efficiency and Pollution Prevention and Management	Highly relevant for Component 2.2 (ABP facility) and Component 1.1 (cold storage and hygienic infrastructure at fishing port), where risks include wastewater

	generation, organic waste, and energy consumption. Resource-efficient technologies and pollution control systems will be integrated into design.
ESS4: Community Health and Safety	Applies to Components 1 and 2 due to risks from increased traffic, noise, and dust during construction, especially in populated areas. Also applies to potential public health risks from ABP facility operation and marine works. CHS protocols will be included in ESMPs.
ESS5: Land Acquisition and Involuntary Resettlement	No land acquisition is currently anticipated under the Project, as all infrastructure activities are expected to be carried out on state-owned land. However, if project circumstances change, any associated risks and impacts related to ESS5 will be addressed in full accordance with the provisions outlined in the Project's Resettlement Policy Framework (RPF).
ESS6: Biodiversity Conservation and Sustainable Management of Living Natural Resources	Particularly relevant for Component 1.1 involving coastal and marine construction activities (e.g., port dredging and infrastructure at Cape Đeran). Marine habitats and ecosystem services will be assessed, and mitigation measures defined.
ESS8: Cultural Heritage	Component 1.1 and 2.1 construction activities may trigger chance finds procedures. Cultural heritage screening will be included in ESIAs/ESMPs and aligned with national heritage authority protocols.
ESS10: Stakeholder Engagement and Information Disclosure	Applies across all components. A detailed Stakeholder Engagement Plan (SEP) has been developed to ensure transparent, inclusive, and ongoing engagement with fishers, farmers, local communities, vulnerable groups, and relevant institutions throughout project implementation.

The following ESSs are not currently relevant:

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- **ESS7: Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities** – Not applicable to Montenegro. - **Not Relevant**
- **ESS 9: Financial Intermediaries.** - **Not Currently Relevant**

3. Project Implementation Arrangements

The Ministry of Agriculture, Forestry and Water Management (MAFWM), through the Project Management Team (PMT), will manage the Project, technically supported by the Ministry of Finance. The PMT, which was already established for the implementation of the former MIDAS Project and the ongoing MIDAS2 Project, will continue to serve as the core unit responsible for the day-to-day management of the CRFASD Project.

The current composition of the PMT includes a Project Coordinator, Project Manager, Senior Civil Engineer (part-time), Senior Monitoring and Evaluation (M&E) Specialist, Senior Environmental and Social Framework (ESF) Specialist (part-time).

To support the expanded scope and complexity of CRFASD activities, the PMT will be reinforced with additional positions, including:

1. **Full-time** Social Development Specialist;
2. Full-time Civil Engineer;
3. Full-time Animal By-Product (ABP) Specialist.

Building on its demonstrated capacity and institutional memory, the PMT will be strengthened with these additional staff and technical expertise to ensure effective implementation of the CRFASD

Project.

The PMT will be responsible for:

- Technical coordination and oversight of all project components;
- Management and oversight of environmental and social (E&S) safeguards, including implementation and monitoring of all ESF instruments (e.g., ESMF, RPF, SEP, LMP, ESCP);
- Operation and administration of the Project Grievance Redress Mechanism (GRM), including the intake, processing, resolution, and reporting of grievances;
- Monitoring, evaluation, and reporting on project performance, including safeguards compliance and grievance trends;
- Stakeholder engagement, citizen feedback, and public disclosure mechanisms;
- Communication and coordination with relevant national and municipal stakeholders;
- Liaison with the World Bank and development partners on project implementation progress and compliance matters.

In addition, the PMT may contract external consultants or advisory firms to provide specialized inputs in areas such as feasibility studies, infrastructure design and supervision, digital system support, training delivery, information dissemination, consultation and grievance management, and fiduciary advisory services.

Fiduciary functions, including procurement and financial management, will continue to be centralized under the Technical Services Unit (TSU) within the Ministry of Finance, as was the case under MIDAS2. The PMT will work closely with the TSU to ensure timely procurement processing, disbursement, and financial accountability in line with World Bank requirements.

- **Technical Support Unit (TSU):**

The Technical Services Unit (TSU) under the Ministry of Finance will retain full responsibility for procurement and financial management under the CRFASD Project. This arrangement builds on the well-established fiduciary implementation model used successfully during MIDAS and MIDAS2. The TSU will:

- Manage all procurement processes in accordance with World Bank Procurement Regulations
- Oversee disbursement and financial transactions
- Ensure compliance with fiduciary standards and internal controls
- Support financial reporting, budgeting, and audit requirements

The TSU has demonstrated strong institutional capacity and will continue to work closely with the PMT, ensuring streamlined coordination and fiduciary oversight throughout project implementation.

Implementing Directorates and Agencies:
Several technical directorates and agencies under the Ministry of Agriculture, Forestry and Water Management (MAFWM) will lead the implementation of their respective areas in accordance with their legal mandates and technical competencies:

- **Directorate for Fisheries (DfF):** Responsible for implementation of activities under Component 1, including the construction and operation of the fishing port in Ulcinj, development of post-harvest infrastructure, and capacity building for fishers and fisheries associations.
- **Directorate for Payments (DfP):** Leads activities under Component 2.1, focused on the establishment and operationalization of a fully functional Paying Agency and the upgrade of the Integrated Administration and Control System (IACS).

- **Administration for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA):** Responsible for the implementation of Component 2.2, which includes the development and operationalization of the Animal By-product (ABP) management system, aligned with EU regulatory frameworks.
- **Directorate for Rural Development (DfRD):** May provide supporting functions to ensure alignment of CRFASD institutional activities with broader rural development policies and Common Agricultural Policy (CAP) frameworks.

Each entity will lead technical aspects of the activities within their scope, while working in close coordination with the PMT.

Interagency Collaboration and Partnerships:

The MAFWM and the PMT will collaborate with key international and national stakeholders to leverage technical expertise and ensure harmonization with EU and global best practices. This includes:

- European Union Delegation to Montenegro
- Food and Agriculture Organization (FAO)
- Other development partners active in agriculture, fisheries, and institutional development

This partnership approach will strengthen capacity building, policy alignment with EU directives, and knowledge exchange in key areas such as fisheries governance, food safety, and climate resilience.

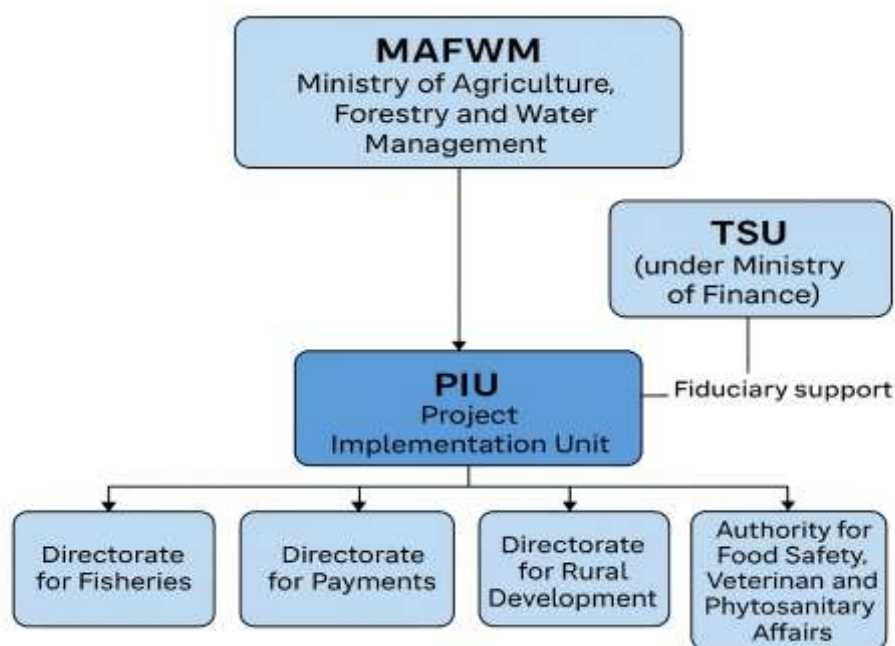


Figure 1: CRFADS Project implementation structure, schematic illustration

Environmental and Social Risk Management

The Project Management Team (PMT), operating under the Ministry of Agriculture, Forestry and Water Management (MAFWM), will be responsible for overseeing environmental and social (E&S) risk management during the implementation of the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project.

This enhanced structure reflects the increased scope, complexity, and E&S risks associated with the CRFASD Project. The inclusion of full time Social Development Specialist and full time Civil Engineering specialists will ensure dedicated support for environmental and infrastructure-related supervision, while the addition of an ABP Specialist will strengthen the implementation of animal by-product management measures.

Together, these two ESF specialists will ensure the comprehensive application of the World Bank's Environmental and Social Framework (ESF), relevant ESS and requirements across all CRFADS activities.

Their core responsibilities will include:

- Coordinating and leading the preparation, implementation, and monitoring of environmental and social instruments as per the approved and disclosed Framework instruments and ESSs—such as Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs), Labor Management Procedures (LMPs), and the Stakeholder Engagement Plan (SEP), where relevant site specific Resettlement Action Plan(RAP) —ensuring effective collaboration across relevant disciplines and stakeholders, particularly for complex and multidisciplinary assessments like the ESIA;
- Ensuring continuous compliance with the Environmental and Social Commitment Plan (ESCP) and full adherence to all applicable World Bank Environmental and Social Standards (ESS1–ESS10);
- Integrating environmental and social requirements into bidding documents and contracts for infrastructure works and consulting services, ensuring that contractors and service providers are contractually bound to implement E&S mitigation measures;
- Overseeing, together with the Supervision Consultant, the effective implementation of E&S mitigation measures by contractors during construction and operational phases, including management of labor and working conditions, occupational health and safety (OHS), community health and safety, and grievance redress;
- Supporting the delivery of the Stakeholder Engagement Plan (SEP), ensuring that consultations are inclusive, culturally appropriate, gender-sensitive, and accessible to disadvantaged and vulnerable groups;
- Monitoring and reporting on the implementation of ESCP and relevant ESF instruments.
- Monitoring and reporting on the implementation of climate adaptation measures, gender equality initiatives, and social inclusion actions in accordance with the Project's Results Framework,
- Coordinating and supervising the Grievance Redress Mechanism (GRM), including grievance intake, tracking, resolution, and reporting, with particular attention to grievances involving vulnerable groups and any cases related to Sexual Exploitation, Abuse, and Harassment (SEA/SH). Clear responsibilities for the GRM will be assigned at three levels: (i) the PMT level, where the Social Development Specialists will oversee and consolidate grievance management; (ii) the Municipality level, where designated focal points will serve as local admission desks for grievance intake and first-line response; and (iii) the Site level, where contractors will be responsible for maintaining grievance logbooks and reporting site-specific complaints related to construction activities).

The PMT will maintain overall responsibility for environmental and social risk management, stakeholder engagement, and grievance handling throughout project implementation, ensuring that all activities are executed in a timely, transparent, and compliant manner.

Capacity Building and Knowledge Transfer

The project will finance training programs and technical assistance for key institutional stakeholders (MAFWM directorates, municipalities, inspectors, and sector regulators), as well as for project beneficiaries such as fishers, agribusinesses, and women entrepreneurs. Capacity building activities will include:

- EU-compliant fisheries and food safety governance
- Operation of climate-resilient infrastructure
- Digital tools and data systems (e.g., fishers' registry, IACS upgrades)
- Environmental and Social Risk management

Monitoring, Reporting, and Evaluation

The Project Management Team (PMT) under the Ministry of Agriculture, Forestry and Water Management (MAFWM) will play a crucial role in project monitoring, reporting, and evaluation. It will carry out these responsibilities through its internal staff along with external expertise that will be hired as per the project needs, and with technical support of

financial and procurement aspects from the Technical Services Unit (TSU). The PMT will be responsible for establishing and maintaining a robust Monitoring and Evaluation (M&E) system to track implementation progress, assess results, and ensure timely reporting across all project components.

The M&E system will align with the Results Framework outlined in the Project Appraisal Document (PAD) and will incorporate indicators related to project development objectives, disaggregated by gender where relevant, and climate co-benefits. The system will also monitor performance against agreed intermediate results and environmental and social commitments under the Environmental and Social Commitment Plan (ESCP).

The PMT will be responsible for:

- Collecting and consolidating data across all components and subcomponents.
- Tracking project outputs, outcomes, and compliance with World Bank fiduciary and ESF requirements.
- Reporting regularly on the achievement of targets and results, including on gender, citizen engagement, and climate action.

In addition to the PMT and TSU, the M&E system will rely on regular inputs from key implementing institutions, including the Directorate for Fisheries (DfF), Directorate for Payments (DfP), the Authority for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA), the working Groups (WG) and municipal governments in Ulcinj, Bar, and Nikšić. These entities will designate focal points responsible for collecting and submitting monitoring data from their respective areas, including local consultations, safeguards implementation, and infrastructure progress. Their inputs will be consolidated by the PMT into periodic reports.

The PMT will prepare quarterly and semi-annual progress reports for submission to the World Bank. The specific reporting requirements, formats, and timelines will be detailed in the Project Operational Manual (POM), which will be finalized shortly after project effectiveness. Until the POM is adopted, interim reporting will follow the World Bank's requirements and agreed-upon arrangements during supervision. These reports will support effective project monitoring, inform World Bank supervision missions, and facilitate adaptive management throughout project implementation.

The PMT will also oversee:

- A mid-term review of project implementation (to be conducted jointly with the World Bank and key stakeholders).
- A final project evaluation, including beneficiary feedback and lessons learned, to guide future investments and reforms in the fisheries and agrifood sectors.

This structured approach to M&E will ensure transparency, accountability, and evidence-based decision-making throughout the project lifecycle.

4. Objective of The Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) sets out the framework and methodology for systematic, inclusive, and transparent engagement with stakeholders throughout the lifecycle of the Climate-Resilient Fisheries and Agrifood Sector Development (CRFASD) Project. The SEP is developed in accordance with the World Bank's Environmental and Social Framework (ESF), and specifically complies with the requirements outlined under Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure.

Stakeholder engagement under CRFASD is viewed as a continuous, proactive, and participatory process designed to promote open communication, ensure meaningful consultation, and foster collaboration with all individuals and groups who are affected by or have an interest in the project. Effective stakeholder engagement is integral to managing

environmental and social risks, enhancing project design, and improving outcomes for beneficiaries and institutions alike.

The key objectives of this SEP are to:

- ✓ Define a structured approach for stakeholder engagement that is embedded throughout project planning, implementation, and monitoring phases.
- ✓ Identify and map affected parties, interested parties, and vulnerable or disadvantaged groups, including measures for their effective inclusion.
- ✓ Ensure that all communication, consultation, and information disclosure processes are culturally appropriate, gender-responsive, and accessible to stakeholders across different regions and capacities.
- ✓ Provide robust and accessible grievance redress mechanisms to allow stakeholders to voice concerns, seek clarification, and submit complaints—including for sensitive issues such as gender-based violence (GBV), sexual exploitation and abuse (SEA), and sexual harassment (SH).
- ✓ Promote sustained and transparent dialogue between the Project Management Team (PMT), local municipalities (e.g., Ulcinj, Bar, Nikšić), relevant line ministries, implementing agencies, civil society organizations (CSOs), and the broader public.
- ✓ Support the integration of stakeholder feedback into decision-making processes, particularly in relation to key infrastructure investments (e.g., fishing port, ABP facility).
- ✓ Establish measurable indicators and monitoring tools to evaluate the effectiveness and responsiveness of stakeholder engagement activities.
- ✓ Ensure full compliance with national regulatory frameworks and the World Bank's ESS10 requirements on information disclosure, stakeholder engagement, and inclusive participation.

The SEP also establishes two dedicated **Grievance Redress Mechanisms (GRMs)**:

- ✓ A **public-facing GRM** to receive and resolve complaints or suggestions from community members, including vulnerable or marginalized groups. This mechanism will include confidential protocols for SEA/SH cases, grounded in survivor-centered principles.
- ✓ A **worker-specific GRM**, aligned with the Labor Management Procedures (LMP), designed to address labor-related grievances from direct and contracted project workers.

This SEP is a living document. It will be reviewed and updated throughout project implementation to incorporate lessons learned, respond to evolving risks and stakeholder needs, and remain adaptive to the dynamic operating context of Montenegro's fisheries and agrifood sectors.

5. Regulations and Requirements

5.1 National Requirements

Stakeholder engagement and public consultation are integral elements of Montenegro's national legal framework, particularly in the context of environmental protection, construction, and spatial planning. These processes are mandated by several national laws and regulations to ensure transparency, accountability, and meaningful public participation in decision-making.

The Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD) must comply with these national legal provisions to guarantee that stakeholders are appropriately informed, consulted, and engaged throughout the project lifecycle. This compliance not only ensures legal adherence but also supports social acceptance and enhances the overall quality and sustainability of project outcomes.

Where national legislation may not fully align with the World Bank's requirements, the project will also apply Environmental and Social Standard 10 (ESS10) on Stakeholder Engagement and Information Disclosure, to ensure comprehensive, inclusive, and transparent engagement practices are maintained throughout.

- ✓ **Law on Environmental Impact Assessment (EIA) (Official Gazette of Montenegro No. 75/18)**

This law outlines the procedures for assessing the environmental impacts of projects that may significantly affect the environment. It mandates the competent authority, the Environmental Protection Agency (EPA), to engage and consult with relevant authorities, organizations, and the interested public throughout various stages of the EIA process:

- **Screening:** Determining whether a project requires an EIA.
- **Scoping:** Defining the scope and content of the EIA Study.
- **Decision-Making:** Approving or rejecting the EIA Study.

In the final phase, the law requires public disclosure and discussion before a decision is made on the EIA Study. For projects with potential transboundary impacts, the Ministry of Ecology, Sustainable Development and Northern Region Development (MESDNRD) must notify potentially affected countries, providing details about the project, its possible impacts, the nature of the impending decision, and a timeframe for the other country to express its intent to participate in the assessment.

✓ **Law on Construction of Structures (Official Gazette of Montenegro No. 19/25)**

This law governs the design, permitting, construction, and supervision of buildings and infrastructure projects in Montenegro. It outlines procedures for obtaining construction permits, defines responsibilities of investors and contractors, and establishes requirements for public notification and participation in certain phases of construction planning. The law ensures that construction projects comply with technical, environmental, and safety standards and provides for oversight by competent authorities.

✓ **Law on Strategic Environmental Assessment (SEA) (Official Gazette of Montenegro No. 80/05, 59/11, 52/16)**

The SEA law stipulates the conditions, methods, and procedures for conducting strategic environmental assessments of certain plans or programs. It integrates environmental protection principles into the preparation, adoption, and implementation of plans or programs likely to have significant environmental impacts. The competent authority cannot submit a plan or program for further adoption without obtaining approval for the SEA report from the authority responsible for environmental protection. Public participation is a crucial element of the SEA process, ensuring that stakeholders are informed and can contribute to decision-making.

✓ **Law on Environment (Official Gazette of Montenegro No. 52/16)**

This comprehensive law outlines the obligations of all legal and natural persons to provide environmental protection. It emphasizes sustainable use of natural resources, introduction of energy-efficient technologies, use of renewable resources, and measures to prevent and mitigate environmental damage. The law also provides for public involvement in environmental management and mandates the disclosure of information about activities impacting the environment.

✓ **Law on the Protection of Cultural Heritage (Official Gazette of Montenegro Nos. 52/16, 44/17, 18/19)**

This law aims to preserve and enhance cultural heritage, ensuring its sustainable use in accordance with traditional and appropriate practices. Project planning documents must align with studies on the protection of cultural assets and management plans, and they require prior consent from the relevant authority as defined by the law. wapi.gov.me

In summary, the CRFASD project must comply with Montenegro's legal requirements for stakeholder engagement and public consultations as outlined in these laws. This compliance ensures transparency, inclusivity, and the integration of public input into environmental and spatial planning decisions.

5.2 World Bank Requirements

The CRFASD project is subject to the requirements of the World Bank's Environmental and Social Framework (ESF), with Environmental and Social Standard (ESS) 10: Stakeholder Engagement and Information Disclosure serving as

the primary reference for stakeholder-related obligations. ESS10 emphasizes the importance of open, inclusive, and transparent engagement as a core principle of responsible and sustainable project implementation. Stakeholder engagement is defined by the World Bank as a continuous and iterative process that begins at the earliest stages of project preparation and continues throughout the project lifecycle.

While ESS10 is central to the preparation and implementation of the Stakeholder Engagement Plan (SEP), its provisions should be interpreted in conjunction with other relevant ESSs—particularly those related to labor and working conditions (ESS2), community health and safety (ESS4), biodiversity (ESS6), and grievance redress mechanisms—since effective stakeholder engagement is a cross-cutting requirement throughout the ESF.

Key requirements under ESS10 include:

- **Early and Proactive Engagement:** Borrowers are required to initiate stakeholder engagement as early as possible in the project development process. Engagement must be timely and aligned with the project cycle to ensure stakeholders have a meaningful opportunity to influence the design and implementation of the project.
- **Proportionality:** The nature, scope, and frequency of stakeholder engagement must be proportionate to the project's risks, impacts, and context. For the CRFASD project—given its substantial risk classification and national importance—robust and inclusive stakeholder engagement is essential.
- **Meaningful Consultations:** Stakeholder consultations must be conducted in a culturally appropriate, respectful, and non-coercive manner. Information shared must be relevant, understandable, and accessible to all groups, including those who may be disadvantaged or vulnerable. Engagement must be free from manipulation, intimidation, discrimination, or interference.
- **Feedback Integration:** ESS10 requires that stakeholder feedback be systematically collected, documented, and meaningfully incorporated into project design and implementation. Where suggestions or concerns cannot be accommodated, clear explanations should be provided. This fosters transparency and builds trust among stakeholders.

Core Steps in Stakeholder Engagement: ESS10 outlines the following fundamental elements of the engagement process:

- Stakeholder Identification and Analysis – Mapping all relevant stakeholders, including affected parties, other interested groups, and vulnerable populations.
- Engagement Planning – Defining objectives, methods, and frequency of engagement activities.
- Information Disclosure – Ensuring timely and accessible sharing of project-related information.
- Consultations – Soliciting input and feedback in an inclusive and responsive manner.
- Grievance Redress Mechanism (GRM) – Establishing mechanisms for receiving, processing, and resolving stakeholder complaints.
- Reporting to Stakeholders – Keeping stakeholders informed about project progress and how their feedback has been considered.

Documentation and Disclosure: Borrowers must maintain and disclose a record of stakeholder engagement activities as part of the environmental and social assessment process. This includes:

- A description of stakeholders consulted;
- A summary of issues raised and feedback received;
- An explanation of how stakeholder input was incorporated into project design, or the rationale for not doing so where applicable.

For the CRFASD project, compliance with ESS10 will be ensured through the implementation of this Stakeholder Engagement Plan (SEP), which will be updated throughout the project lifecycle as necessary. The SEP will serve as a key tool for fulfilling ESS10 requirements and strengthening transparency, accountability, and community trust in the project.

5.3 SEP Disclosure and Consultation

This Stakeholder Engagement Plan (SEP) applies to all components and phases of the CRFASD Project and outlines the framework for inclusive, meaningful, and responsive engagement with stakeholders throughout project preparation, implementation, and closure. It is aligned with Environmental and Social Standard 10 (ESS10) of the World Bank's Environmental and Social Framework (ESF), as well as Montenegro's national legislation governing public participation and information disclosure.

The SEP aims to ensure that all relevant stakeholders—including project-affected persons (PAPs), vulnerable and disadvantaged groups, institutional actors, and the general public—are informed and consulted in a culturally appropriate, accessible, and timely manner. It also provides mechanisms for collecting and incorporating feedback into project decision-making, supported by a robust and accessible Grievance Redress Mechanism (GRM).

The CRFASD Project will follow a structured and phased approach to stakeholder engagement and information disclosure, as summarized in the table below:

Table 2: SEP stages and information disclosure

Stage	Purpose	Key Activities	Responsible Entity
1. Internal Review	Ensure alignment with national strategies, institutional mandates, and project objectives	<ul style="list-style-type: none"> Internal clearance of SEP draft by MAFWM, PMT, and technical bodies Coordination with safeguards and planning instruments 	PMT / MAFWM
2. World Bank Review	Ensure consistency with the ESF and obtain formal clearance	<ul style="list-style-type: none"> Submit SEP draft to the World Bank Revise based on feedback Obtain "No Objection" for public disclosure 	PMT, WB
3. Stakeholder Consultations	Gather feedback, promote local ownership, and refine engagement tools	<ul style="list-style-type: none"> Municipal and national consultation events Tailored sessions for vulnerable groups (e.g., women's cooperatives, Roma NGOs) Geographic outreach in Ulcinj, Nikšić, Bar 	PMT / Local Governments// Relevant Directorates (DfF, AFSVPA, DfP) / Working Groups
4. SEP Finalization	Finalize SEP based on stakeholder feedback	<ul style="list-style-type: none"> Document consultation results Update SEP accordingly Prepare annexed feedback matrix Translate final SEP into Montenegrin 	PMT
5. Public Disclosure	Ensure universal access to SEP and project information	<ul style="list-style-type: none"> Publish SEP in Montenegrin and English on the official websites of MAFWM, PMT, participating municipalities, and relevant directorates (DfF, AFSVPA, DfP) Disseminate printed materials at local government offices, agriculture/fisheries extension points, and community centers Use infographics and audiovisual materials to reach low-literacy audiences Engage national and local media (TV, radio, online news portals, social media) 	PMT / MAFWM / Municipalities/ Relevant Directorates (DfF, AFSVPA, DfP)

		to announce disclosure, share project milestones, and promote consultations • Include announcements in minority-language media platforms where applicable	
6. Feedback and Monitoring	Promote continuous engagement and adaptive management	<ul style="list-style-type: none"> • Operate and publicize the GRM • Collect and analyze stakeholder feedback through satisfaction surveys and outreach • Revise SEP periodically as needed 	PMT / GRM Focal Points / M&E Officers

Language and Accessibility

All SEP-related materials—including information on the Grievance Redress Mechanism (GRM), summaries of the Environmental and Social Management Framework (ESMF), and project updates—will be made publicly available in both Montenegrin and English through the official websites of the Ministry of Agriculture, Forestry and Water Management (MAFWM), relevant municipalities, and relevant directorates.

To ensure inclusiveness and accessibility, alternative communication formats will be developed for stakeholders with limited literacy, language barriers, or physical access constraints. These formats will include visual aids, simplified written materials, audio recordings, and oral interpretation during community meetings and consultations.

Given the multi-ethnic and diverse composition of the project areas, specific linguistic measures will be applied:

- In Ulcinj Municipality, where a significant proportion of the population speaks Albanian, project materials and consultations will also be provided in Albanian to ensure meaningful participation and comprehension.
- In Nikšić Municipality, due to the presence of Roma minority groups, additional efforts will be made to provide oral interpretation or simplified communication tools tailored to the needs of Roma communities, recognizing potential language and literacy barriers.

Targeted outreach measures will also be implemented to ensure that disadvantaged and vulnerable groups—including women-led cooperatives, Roma communities, informal fishers, elderly individuals in remote areas, and persons with limited digital access—are not excluded from consultations or project benefits due to linguistic, technological, or mobility-related barriers.

Special Disclosure Note – OP 7.50 on International Waterways

The CRFASD Project has triggered World Bank Operational Policy (OP) 7.50 – Projects on International Waterways due to its potential indirect impacts on shared water bodies and ecosystems. In line with the policy requirements, the Government of Montenegro formally notified the downstream riparian country (Albania) regarding the project.

Following the review of project documentation and confirmation of no significant adverse transboundary effects, the World Bank issued a notification waiver—concluding that further formal disclosure or consultation abroad is not required.

Although OP 7.50 does not mandate public disclosure in riparian countries, a summary of the notification and waiver process is documented in the project files. This SEP includes reference to the waiver in the interest of full transparency. Disclosure of safeguard instruments will continue to be implemented within Montenegro, in accordance with ESS10 and national legal requirements.

6. Brief Summary of Previous Stakeholder Engagement Activities

In the process of identifying and preparing the Climate Resilient Fisheries and Agrifood Sector Development Project (CRFASD), the Ministry of Agriculture, Forestry and Water Management (MAFWM), in collaboration with the World Bank team, engaged in a series of consultations with institutional, municipal, and community-level stakeholders. These

engagements aimed to assess institutional readiness, gather feedback on sector priorities, identify potential risks, and inform the design of project components and environmental and social safeguards instruments.

The consultations were carried out through bilateral meetings, technical discussions, workshops, and the review of documentation and lessons learned from the ongoing MIDAS2 project. Importantly, targeted and detailed consultations were conducted for the Environmental and Social Impact Assessment (ESIA) of the Ulcinj Fishing Port—one of the CRFASD's largest infrastructure investments under Component 1.

Stakeholder Engagement for the Ulcinj Fishing Port ESIA

In accordance with Environmental and Social Standard 10 (ESS10) of the World Bank's Environmental and Social Framework (ESF), meaningful consultations for the Ulcinj Fishing Port began early in the project cycle and continued throughout the development of the Environmental and Social Impact Assessment (ESIA) and Environmental and Social Management Plan (ESMP). These consultations involved a wide range of stakeholders, including:

- National ministries and agencies (e.g., MAFWM, MESPU, Environmental Protection Agency, Ministry of Capital Investments)
- Ulcinj Municipality and local assembly representatives
- Fishermen's associations and cooperatives based in Ulcinj Municipality — particularly representing fishers operating in the areas of Cape Đeran, Velika Plaža, Donji Štoj, and Gornji Štoj — participated in the consultations organized under the Environmental and Social Impact Assessment (ESIA) for the Ulcinj Fishing Port.
- In addition, national-level organizations such as NGOs based in Podgorica, including Green Home and CZIP, which are active in environmental advocacy and fisheries-related issues in the Ulcinj area, also took part in the consultation process, providing broader environmental and community perspectives.
- Business and tourism community members
- Local residents of the Djerane neighborhood (directly adjacent to the port site)
- Academic and environmental institutions (e.g., Marine Biology Institute)

Consultation tools included online and in-person meetings, focus groups, direct interviews, and a socio-economic survey. The public scoping meeting was held in March 2022, and the formal public hearing on the draft ESIA was conducted in January 2023 in Ulcinj. The ESIA was subsequently revised to integrate comments from stakeholders and the Environmental Protection Agency (EPA) review commission.

The finalized ESIA and ESMP as per the National Legislation for the Ulcinj Fishing Port were formally disclosed to the public in accordance with Montenegrin national legislation and the World Bank's Environmental and Social Standard 10 (ESS10), and prior to the preparation of this Stakeholder Engagement Plan (SEP). Since December 2023, the documents have been publicly available, officially disclosed on the Ministry of Agriculture, Forestry and Water Management (MAFWM) website under the Environmental Documentation section: [Link to ESIA Disclosure – MAFWM Website] (<https://www.gov.me/clanak/elaborat-procjene-uticaja-na-zivotnu-sredinu-za-projekat-izgradnje-ribarske-luke-na-rtu-deran>). A full summary of issues raised and how they were addressed during project preparation is available in Annex 1 and within the disclosed ESIA document for the Ulcinj Fishing Port.

This early and comprehensive consultation process reflects the seriousness and transparency of the CRFASD's approach to stakeholder engagement. The insights gained—especially regarding Port Milena, Ulcinj Salina, tourism impacts, and design preferences—directly informed port layout alternatives and mitigation strategies.

The PMT is committed to applying the same level of integrated and transparent stakeholder consultation during the environmental and social due diligence for the remaining infrastructure investments under the project, including the Animal By-Product (ABP) facility in Nikšić and Paying Agency Regional Offices in Bar and Nikšić.

Table 3: Summary of Stakeholder Engagement During Project Preparation

Stakeholder	Engagement Method	Date and Location	Topics Discussed	Key Feedback and Results
Directorate for Fisheries (DfF)	Bilateral meetings and technical consultations	April–May 2025, MAFWM, Podgorica	Capacity needs for CRFASD implementation and coordination with fisher associations	Strengthen collaboration with local institutions; clarify roles and mandates
Directorate for Payments (DfP) and Directorate for Rural Development (DfRD)	Technical consultations	April–May 2025, MAFWM, Podgorica	Integration with CAP and rural development initiatives	Align CRFASD with national and EU strategies; enhance inter-agency coordination
Administration for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA)	Institutional meetings	April–May 2025, Podgorica	Inspection system gaps; weak stakeholder feedback mechanisms	Strengthen cross-sectoral coordination; improve stakeholder platforms
Municipality of Ulcinj	Stakeholder consultations	May–June 2025, Ulcinj	Infrastructure gaps in fisheries; sustainable port management	Promote co-design with municipal units and fishers; integrate sustainable practices
Municipality of Bar	Stakeholder consultations	May–June 2025, Bar	Alignment with local development strategies	Foster planning coordination and inter-municipal dialogue
Municipality of Nikšić	Stakeholder consultations	June 2025, Nikšić	Past limited stakeholder engagement	Ensure inclusive engagement throughout the project cycle
Fisher associations, producers, market actors	Focus group and technical consultations	May 2025, Ulcinj	Traceability systems and regulatory compliance challenges	Upgrade data systems; offer compliance-focused training for fishers
Agrifood producers and processors	Field visits and interviews	May–June 2025, Nikšić	Capacity gaps in food safety and traceability	Deliver technical training, organize study visits, and provide advisory support
MAFWM, EPA, NGOs (Green Home, CZIP), Ulcinj Municipality, Djerane residents, business and fisher groups	Multi-stage stakeholder engagement (scoping meetings, public hearings, surveys)	July 2020–Jan 2023, Ulcinj and online	Environmental impacts, marine biodiversity, wastewater, tourism value	Conduct ESIA/ESMP Ulcinj Fishing Port, explore design alternatives, disclose publicly, safeguard tourism/ecological assets
General Public, NGOs, Municipalities	Information Disclosure (ESIA and ESMP for Ulcinj Fishing Port)	Dec 2023–Present, Ulcinj, Podgorica, Nikšić, Bar, online platforms	Public disclosure of ESIA/ESMP, and safeguard instruments	Stakeholders accessed materials via websites and in print; feedback used to revise safeguard instruments prior to final clearance

6.1 Lessons Learned from Previous Consultations

In recent years, the Government of Montenegro (GoM), in collaboration with the World Bank, has implemented various agriculture and fisheries sector operations—including the ongoing MIDAS2 Project—which offer valuable

insights for stakeholder engagement under the new Climate-Resilient Fisheries and Agrifood Sector Development (CRFASD) Project. Lessons learned from these previous operations, particularly in relation to stakeholder consultations, demonstrate the importance of early, continuous, and inclusive engagement across all levels of government and with private sector actors, community representatives, and civil society.

One key lesson is the importance of tailored engagement strategies for different stakeholder groups. These include small-scale fishers, agrifood producers, local authorities, women's groups, and sector-specific associations. Each group brings unique perspectives, interests, and challenges, and consultations must be designed to reflect this diversity—ensuring that voices are heard and considered meaningfully throughout project planning and implementation.

Another important takeaway is the need for early identification of institutional coordination challenges. In previous consultations, overlaps and gaps in institutional mandates were frequently cited as constraints to efficient delivery of project support and technical assistance. To mitigate this, the CRFASD project incorporates enhanced mechanisms for institutional coordination and capacity building, particularly among the Ministry of Agriculture, Forestry and Water Management (MAFWM), the Directorate for Fisheries, the Directorate for Payments, and the Authority for Food Safety, Veterinary and Phytosanitary Affairs.

Engaging small and medium enterprises (SMEs) and the private sector early and consistently has also proven critical for project success. Past feedback highlighted the need to create enabling conditions for private sector participation in the fisheries and agrifood sectors, including transparent access to TA, finance, and support services. In response, Component 3 of the CRFASD project specifically focuses on improving the business climate for fisheries and agrifood-related SMEs, offering opportunities for public-private partnerships, concessional financing, and business development services.

Previous consultations further emphasized the importance of targeted outreach to vulnerable and underrepresented groups, particularly women, youth, and residents in remote areas. Barriers to participation—such as lack of access to information or mobility constraints—can result in their perspectives being overlooked. Therefore, the CRFASD SEP integrates culturally appropriate, gender-sensitive, and accessible communication strategies to ensure the full inclusion of these groups. Moreover, the project includes specific interventions to promote women's entrepreneurship and leadership, developed in collaboration with local NGOs, women's cooperatives, and other civil society actors.

Finally, earlier stakeholder engagement processes underscored the value of continuous feedback loops, where stakeholders are informed not only about consultation opportunities, but also about how their input has shaped project design and implementation. The CRFASD project incorporates structured mechanisms for follow-up communication, as well as a comprehensive Grievance Redress Mechanism (GRM) to ensure transparency and accountability.

Valuable insights were also gained from the multi-stage stakeholder engagement process conducted during the Environmental and Social Impact Assessment (ESIA) for the Ulcinj Fishing Port—one of the CRFASD Project's core infrastructure investments. This process included bilateral meetings, focus groups, socio-economic surveys, and public hearings conducted between 2020 and 2023. Several important lessons emerged:

Combining formal and informal consultation channels—such as direct interviews, surveys, and focus groups—helped capture a broad range of perspectives, particularly from Djerane residents and vulnerable community members who were otherwise hesitant to participate.

Providing interpretation in Montenegrin, Albanian, and English enhanced inclusivity in multilingual areas like Ulcinj.

Including a socio-economic survey strengthened the understanding of localized concerns such as potential tourism impacts and neighborhood-level effects, which were subsequently reflected in the ESIA and ESMP mitigation strategies.

Maintaining a tiered and transparent consultation approach—through early outreach, scoping sessions, and the formal public hearing—helped strengthen trust and resulted in substantive revisions of the ESIA based on public and institutional feedback.

The involvement of fishermen’s associations and tourism-related businesses during site selection and design discussions helped ensure that both economic and environmental priorities were reflected in the final layout. These lessons—grounded in local experience and aligned with international best practices—will guide the stakeholder engagement strategy throughout the CRFASD project lifecycle to foster inclusive, participatory, and effective project outcomes.

6.2 Stakeholder Identification and Analysis

Effective stakeholder identification is a foundational element in the design and implementation of the Stakeholder Engagement Plan (SEP). For the CRFASD Project, stakeholders are categorized into three main groups: (i) Project-Affected Parties (PAPs); (ii) Other Interested Parties (OIPs); and (iii) Vulnerable and Disadvantaged Groups. This classification is consistent with the World Bank’s Environmental and Social Standard 10 (ESS10), which emphasizes inclusive and meaningful engagement, particularly for those who may be disproportionately affected or face barriers to participation. Recognizing the dual nature of the CRFASD—comprising both infrastructure (hard) and institutional (soft) components—a tailored stakeholder identification and engagement approach has been applied to ensure relevance across different project activities.

1. Project-Affected Parties (PAPs)

Project-Affected Parties (PAPs) include individuals, groups, and entities who are likely to be directly and measurably impacted—positively or adversely—by the CRFASD Project’s interventions. These stakeholders are linked to both the physical (hard) infrastructure and institutional (soft) capacity-building dimensions of the project.

Table 4: Identification of Project-Affected Parties (PAPs)

Table 4.1: Group A: PAPs Affected by Hard Investments

Stakeholder Group	Type of Impact	Project Component(s)	Geographic Focus	Project Impact	Influence Level
Male- and female-headed Fishers and coastal households	Temporary access restrictions, marine works, noise during construction	Component 1.1 (Fishing Port in Ulcinj)	Ulcinj Municipality	High	Moderate
Agrifood producers and livestock holders SMEs	Odor, increased traffic, waste during ABP facility construction and operation	Component 2.2 (ABP Facility)	Nikšić and surrounding areas	High	Moderate
Residents and businesses near construction zones	Dust, noise, restricted access during civil works	Components 1.1, 2.1, 2.2	Ulcinj, Bar, Nikšić	High	Moderate
Construction workers and subcontracted laborers	Occupational risks during works	Components 1 and 2	All infrastructure locations	High	Moderate
Port users, vendors, processors	Temporary operational disruption, future economic benefit	Component 1.1	Ulcinj Municipality	Moderate	Moderate

Local tourism and hospitality operators	Short-term disturbance, long-term environmental gain	Component 1.1	Ulcinj coastal area	Moderate	Low
Property and business owners in Djerane	Risk of property devaluation, restricted access, tourism decline	Component 1.1	Ulcinj – Djerane	High	Moderate
Informal seasonal vendors and beach workers	Temporary loss of income during construction	Component 1.1	Cape Đeran, Velika Plaža	Moderate	Low
Local Community II (Mjesna Zajednica) of Ulcinj	Local administrative coordination, complaints handling	Component 1.1	Djerane – Ulcinj	Moderate	Moderate

Table 4.2: Group B: PAPs Affected by Soft Investments

Stakeholder Group	Type of Impact	Project Component(s)	Geographic Focus	Project Impact	Influence Level
Registered fishers, aquaculture operators, cooperatives	Regulatory access, training, registry inclusion	Component 1.2	Coastal and inland fisheries zones	High	Moderate
Informal fishers and unregistered fishers' groups	Risk of exclusion; targeted outreach for inclusion	Component 1.2	Coastal zones (Ulcinj, Bar)	Moderate	Low
Agrifood producer associations and rural cooperatives	Access to training, technical assistance, policy engagement	Component 2.1	Nikšić, rural municipalities	High	Moderate
DfF, DfP, AFSVPA staff	Institutional capacity building, IT upgrades	Components 1.2, 2.2, 3	National and regional level	High	High
Women in fisheries/agrifood	Skills upgrading, entrepreneurship support	Cross-cutting	All target municipalities	Moderate	Low
Local inspectors and extension agents	Improved service delivery tools and responsibilities	Components 1.2, 2.2	Local administration zones	Moderate	Moderate
Public servants in PA Regional Offices	Institutional reform, IACS deployment	Component 2.1	Nikšić and Bar	High	Moderate
Youth and new entrants	Access to jobs, training, and incubation programs	Component 3	National coverage	Moderate	Low

Each of these stakeholder groups will be engaged through tailored methods and tools, with their feedback systematically documented to ensure meaningful consultation and inclusion across both the physical and institutional components of the CRFASD Project. The specific methods and engagement approaches are detailed in Chapter 8.2.

2. Other Interested Parties (OIPs)

Other Interested Parties (OIPs) are individuals, groups, or institutions who may not be directly affected by project activities but have an interest in or influence over the design, implementation, monitoring, or outcomes of the CRFASD Project. Their engagement is essential for ensuring transparency, policy alignment, technical oversight, and successful integration with ongoing sectoral initiatives.

This group includes institutional stakeholders, regulatory bodies, knowledge institutions, and actors indirectly benefitting from the environmental, public health, and socio-economic outcomes of the project. In line with World Bank ESS10, the CRFASD project seeks to engage these parties through structured information-sharing, consultation, and collaboration.

Table 5: Identification of Other Interested Parties (OIPs)

Stakeholder Group	Type of Interest / Relevance	Project Linkage / Role	Geographic Focus	Project Impact	Influence Level
Ministry of Agriculture, Forestry and Water Management (MAFWM) and its directorates (DfF, DfP, DfRD)	Policy leadership, sector alignment, institutional reform	Lead implementing agency for CRFASD components	National	High	High
Authority for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA)	Regulatory enforcement, EU alignment	Implements ABP control systems and supports food safety under Component 2.2	National	High	High
Environmental Protection Agency (EPA), Environmental and Veterinary Inspectorates	Oversight of environmental compliance, monitoring, and food safety	Responsible for permitting, inspections, and enforcement during civil works and operations	National and local	High	High
Project Management Team (PMT), Technical Support Implementation Unit (TSIU), Working Groups (WGs),	Project delivery, coordination, and oversight	Manage day-to-day implementation, technical guidance, M&E, fiduciary tasks, and policy coordination	National and local	High	High
Ministry of Capital Investments (MCI) and Port/Maritime Safety Authorities	Transport and infrastructure governance	Engage on infrastructure design, marine safety, and interface with coastal zone planning	National and coastal	Moderate	Moderate
Public Enterprise for Coastal Zone Management (JPMDCG)	Regulatory management of public coastal areas	Coordinates with local authorities and MAFWM on spatial compatibility and land use	Coastal municipalities	Moderate	Moderate
Institute of Marine Biology (Kotor)	Biodiversity research and marine monitoring	Technical support to ESMP implementation and coastal ecological assessments	National and coastal	Moderate	Moderate
Municipalities of Ulcinj, Bar, and Nikšić	Infrastructure co-management, citizen outreach	Support local implementation, SEP activities, and GRM operations	Ulcinj, Bar, Nikšić	High	High
Academic institutions (e.g., University of Montenegro)	Research and technical training	Supports curriculum development and technical capacity building	Podgorica, Nikšić	Moderate	Moderate
Civil society organizations and NGOs	Advocacy, community mobilization, inclusion	Promote outreach to vulnerable groups and policy accountability	National and local	Moderate	Moderate

Development partners (EU, FAO, bilateral donors)	Co-financing, technical support	Align parallel programs and leverage international good practices	International and national	High	High
Media outlets and information platforms	Public communication and transparency	Disseminate updates, project achievements, and citizen information	National and regional	Moderate	Moderate
HoRACs (Hotels, Restaurants, Cafés) and tourism sector	Indirect beneficiaries of environmental outcomes	Positively affected by waste management and improved infrastructure	Coastal municipalities	Moderate	Low
Tourists and general public	Users of improved environment and infrastructure	Indirectly benefit from cleaner sites, food safety, and sector reform	Coastal zones, national reach	Moderate	Low

These OIPs will be engaged through targeted information-sharing campaigns, coordination meetings, and joint technical events to ensure inclusive participation, sector alignment, and successful implementation of the CRFASD Project.

3. Vulnerable and Disadvantaged Groups

In accordance with ESS10 of the World Bank Environmental and Social Framework (ESF), the CRFASD Project places a strong emphasis on identifying, engaging, and supporting vulnerable and disadvantaged individuals or groups who may be disproportionately affected by project activities or face barriers in accessing project benefits, participating in consultations, or voicing concerns.

Vulnerability in this context refers to a combination of social, economic, geographic, gender-based, or institutional factors that may limit access to information, participation, or benefits associated with CRFASD interventions. Stakeholder consultations conducted under the ESIA, as well as feedback from previous World Bank-financed operations in Montenegro (e.g., MIDAS2), have provided valuable insight into locally relevant vulnerability dynamics.

To ensure equity and inclusiveness throughout implementation, the SEP adopts a structured and differentiated approach to engaging disadvantaged and vulnerable groups, in line with ESS10. This classification allows for targeted engagement strategies that respond to the nature and severity of barriers faced by various segments of the population:

- **Group 1:** Direct Project Beneficiaries Facing Barriers to Participation – This category includes individuals and communities expected to directly benefit from CRFASD activities but who may experience participation constraints due to social, economic, geographic, gender-based, or cultural factors. Examples include women engaged in fisheries or food processing, youth in remote coastal communities, and small-scale producers with limited access to institutional support and information.
- **Group 2:** Broader Vulnerable or Disadvantaged Populations – These are individuals or groups not necessarily direct beneficiaries but who may be at risk of marginalization, exclusion from consultation processes, or disproportionate impacts from project implementation. This includes, but is not limited to, persons with disabilities, elderly individuals in isolated rural areas, Roma communities, and linguistically or culturally marginalized groups:

Table 6: Identification of Disadvantaged and Vulnerable Groups

Table 6.1: Group 1: Direct Project Beneficiaries Facing Barriers to Participation

Stakeholder Group	Nature of Vulnerability	Barriers to Engagement	Proposed Measures	Inclusion	Geographic Focus
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Women-headed fisher households	Disproportionate caregiving roles, mobility constraints, underrepresentation	Limited availability for public meetings; reduced access to technical assistance-related information	Schedule-friendly consultations, targeted outreach, simplified materials, and dedicated communication channels	Ulcinj, Bar
Economically marginalized fisher households	Low financial literacy, limited access to finance or administrative support	Risk of exclusion from matching technical assistance or formal processes	Tailored support for application processes, hands-on advisory services, one-on-one technical assistance	All project areas
Informal fishers and unregistered operators	Lack of formal status, mistrust in institutions	Difficulty engaging in formal stakeholder processes	Simplified registration drives, culturally relevant communication, community intermediaries	Coastal communities

Table 6.2: Group 2: Broader Vulnerable or Disadvantaged Populations

Stakeholder Group	Nature of Vulnerability	Barriers to Engagement	Proposed Inclusion Measures	Geographic Focus
Ethnic minorities (e.g., Roma, Egyptians)	Risk of social exclusion, language or literacy barriers, distrust in institutions	Limited participation in formal engagements; lack of tailored communication channels	Involvement of cultural mediators, use of translated materials, partnerships with local CSOs trusted by communities	All project areas
Persons with disabilities / low literacy	Limited physical or cognitive accessibility, low formal education	Difficulty accessing venues, understanding written project documents	Accessible formats (audio, large print, Braille), physically inclusive meeting spaces, visual/oral communication tools	All project areas
Underserved coastal rural communities	Geographic isolation, inadequate infrastructure, limited access to public services	Reduced exposure to project updates, low institutional visibility, weak transport links	Use of mobile consultation units, partnerships with local NGOs, info points at municipal offices, community-based outreach	Villages in coastal hinterlands of Ulcinj and Bar (e.g., Donji Štoj, Vladimir, Klezna)
Elderly smallholders and pensioners	Age-related mobility or communication barriers, exclusion from digital tools	Lack of access to digital/online information and mobility to attend consultations	Printed materials, home visits, and community focal points for information sharing	Rural municipalities
Youth not in employment, education, or training (NEET)	Disengagement from formal systems and employment pathways	Low institutional trust, digital exclusion, lack of incentives for participation	Peer-based outreach, partnerships with youth NGOs, youth ambassadors, inclusion in vocational activities	All project areas

Each of these stakeholder groups will be engaged through context-sensitive, inclusive, and culturally appropriate methods throughout the project lifecycle. Their participation will be essential for effective project implementation,

social acceptability, and long-term sustainability. Participation by vulnerable groups will be tracked through disaggregated indicators and monitored regularly to ensure adaptive engagement, transparency, and feedback loops.

6.3 Summary Stakeholder Needs

This section provides an overview of the communication and engagement preferences of key stakeholders under the CRFASD project. It includes their key characteristics, language needs, preferred communication methods, and any special needs that must be considered to ensure inclusive and effective engagement.

Table 7: Communication needs of stakeholders

Table 7.1: Communication Needs of Project-Affected Parties (PAPs) – Hard Investment Stakeholders

Stakeholder Group	Language Needs	Preferred Communication Methods	Special Needs / Considerations
Male- and female-headed Fishers and coastal households	Montenegrin, Albanian (Ulcinj area)	Community meetings, posters at landing sites, outreach via fishers' associations	Gender-sensitive timing, visual and oral formats, respect for seasonal work cycles
Agrifood producers and livestock holders SMEs	Montenegrin	Meetings through cooperatives, leaflets at veterinary/agricultural stations	Technical info simplified for non-specialists, scheduling around market days
Residents and businesses near construction zones	Montenegrin, Albanian (Ulcinj)	Community noticeboards, municipal website updates, in-person briefings	Advance notice of works, mitigation info, access routes explained clearly
Construction workers and subcontracted laborers	Montenegrin, Albanian (as relevant)	Site inductions, tool-box talks, SMS/WhatsApp notifications	OHS-focused communication, grievance awareness, clear reporting chain
Port users, vendors, processors	Montenegrin, Albanian	Targeted meetings at the port, visual display boards, SMS alerts	Early warning on access interruptions, hygiene/safety protocols, clear grievance channels
Local tourism and hospitality operators	Montenegrin, English (as needed for managers)	Info packs through tourism board, joint municipal-tourism briefings	Emphasis on environmental safeguards, timeline transparency, visuals/maps
Property and business owners in Djerane	Montenegrin, Albanian	Door-to-door updates, small group meetings, printed bulletins	Clear info on access, noise, property safeguards; channels for complaints
Informal seasonal vendors and beach workers	Montenegrin, Albanian	Beach patrol outreach, oral announcements, visual signage	Mobility-based outreach, simplified messages, conflict-avoidance protocols
Local Community II (Mjesna)	Montenegrin, Albanian	Coordination meetings, printed info at community centers	Role in local GRM intake, trusted liaison

Zajednica) of Ulcinj			for wider community concerns
General public and citizens of Niksic	Montenegrin	Municipal website, community meetings, local radio/TV announcements	Broad awareness campaigns; info accessible in simple language
Utility companies serving the geographic area of Niksic	Montenegrin	Coordination meetings, technical circulars, written notices	Early technical alignment; need for clear responsibilities on service disruptions
Communities living around the intended location of the ABP plant in Niksic	Montenegrin And Roma (as needed)	Door-to-door visits, community meetings, leaflets, radio spots	Targeted info on health safeguards, odor/noise control, and land-use impacts
Farmers, slaughterhouses, and meat processing facilities that will be required to use the ABP system for disposal of animal waste.	Montenegrin	Workshops, technical manuals, info packs at veterinary/agriculture offices	Clear explanation of obligations, cost implications, disposal procedures
Possible Transport companies who may be interested in acquiring licenses for transport animal byproducts	Montenegrin	Business info sessions, licensing briefings, online notices	Regulatory clarity, licensing requirements, transparent process
Business owners in the wider surrounding of the intended location for the ABP Plant in Niksic	Montenegrin	Municipal briefings, printed bulletins, business association meetings	Focus on property values, traffic impacts, grievance channels

Table 7.2: Communication Needs of Project-Affected Parties (PAPs) – soft Investment Stakeholders

Stakeholder Group	Language Needs	Preferred Methods	Communication	Special Needs / Considerations
Registered fishers, aquaculture operators, cooperatives	Montenegrin, Albanian (coastal areas)	Workshops via fishers' unions, printed guidelines, SMS/email alerts		Use of sector-specific terminology, targeted capacity building materials

Informal fishers and unregistered fishers' groups	Montenegrin, Albanian (Ulcinj, Bar)	Oral outreach through facilitators, community radios, peer group discussions	Trust-building approach, simplified language, culturally adapted communication
Agrifood producer associations and rural cooperatives	Montenegrin	Trainings at cooperative hubs, printed manuals, info sessions at agricultural centers	Emphasis on regulatory compliance, local dialect clarity, flexibility for seasonal work
DfF, DfP, AFSVPA staff	Montenegrin	Formal circulars, e-bulletins, internal workshops	Professional tone, performance tracking, opportunities for feedback loops
Women in fisheries/agrifood	Montenegrin, Albanian (where relevant)	Women-led group meetings, visual leaflets, NGO partnerships	Gender-sensitive facilitation, support for mobility/childcare, inclusion in business schemes
Local inspectors and extension agents	Montenegrin	Technical briefings, field visits, digital manuals	Tools for reporting, feedback mechanisms, ongoing capacity development
Public servants in PA Regional Offices	Montenegrin	Training modules, inter-departmental briefings, printed SOPs	Change management orientation, integration with IACS system updates
Youth and new entrants	Montenegrin	Social media campaigns, youth-focused info sessions, school outreach	Incentive-based engagement, digital tools, vocational orientation materials

Table 7.3: Communication Needs of Other Interested Parties (OIPs)

Stakeholder Group	Language Needs	Preferred Communication Methods	Special Needs / Considerations
Ministry of Agriculture, Forestry and Water Management (MAFWM) and its directorates (DfF, DfP, DfRD)	Montenegrin	Formal letters, coordination meetings, technical briefings	Alignment with strategic documents and EU benchmarks; inter-departmental coordination tools
Administration for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA)	Montenegrin	Written guidance, joint planning sessions, e-bulletins	Consistency with EU-compliant systems and veterinary protocols
Environmental Protection Agency (EPA), Environmental and Veterinary Inspectorates	Montenegrin	Site visits, regulatory workshops, permit coordination meetings	Clear alignment with EIA/ESIA procedures and enforcement responsibilities
PMT, TSIU, WGs,	Montenegrin	Steering Committee meetings, email updates, internal dashboards	Task-based reporting, decision logs, inter-agency collaboration
Ministry of Economic Development/Ministry of Public Works/Ministry of Maritime Affairs/Ministry of Spatial Planning, Urbanism and State	Montenegrin	Technical design consultations, formal memos	Integration with transport/maritime safety policies and risk protocols

Property and Port/Maritime Safety Authorities			
Public Enterprise for Coastal Zone Management (JPMDCG)	Montenegrin	Policy roundtables, land-use coordination meetings	Spatial planning alignment and regulatory clarity
Institute of Marine Biology (Kotor)	Montenegrin, English	Scientific workshops, environmental monitoring sessions	Data sharing protocols; input to marine biodiversity management plans
Municipalities of Ulcinj, Bar, and Nikšić	Montenegrin, Albanian (Ulcinj)	Joint planning sessions, coordination platforms, municipal circulars	Local capacity support; bilingual materials where applicable
Academic institutions (e.g., University of Montenegro)	Montenegrin, English	Research partnerships, academic seminars, curriculum consultations	Technical input on food safety, biodiversity, fisheries science
Civil society organizations and NGOs	Montenegrin, English	Public consultations, feedback forms, collaborative forums	Ensure early participation; feedback on social and environmental safeguards
Development partners (EU, FAO, bilateral donors)	English	Project review missions, donor coordination meetings, progress reports	Alignment with complementary programs and co-financing modalities
Media outlets and information platforms	Montenegrin	Press releases, press briefings, social media campaigns	Timely and factual dissemination of project updates and milestones
HoRACs (Hotels, Restaurants, Cafés) and tourism sector	Montenegrin, English	Focus groups, printed information packs, local business forums	Highlight links to environmental outcomes and tourism assets
Tourists and general public	Montenegrin, English, Albanian (Ulcinj, where relevant)	Online portals, public posters, community announcements	Multilingual, accessible communication; visual media preferred for outreach

Table 7.4: Communication Needs of Group 1 – Direct Project Beneficiaries Facing Barriers to Participation

Stakeholder Group	Language Needs	Preferred Methods	Communication	Special Needs / Considerations
Women-headed fisher households	Montenegrin, Albanian (Ulcinj)	Targeted women's outreach sessions, peer-led small group		Schedule-friendly formats, childcare support, transport stipends, safe and culturally appropriate venues

		meetings, visual and verbal materials	
Economically marginalized fisher households	Montenegrin	Door-to-door outreach, illustrated handouts, local info desks at fish markets	Hands-on advisory support with forms, financial literacy guidance, verbal explanation of processes
Informal fishers and unregistered operators	Montenegrin, Albanian (Ulcinj, Bar)	Intermediary-facilitated small group discussions, info sessions through local NGOs or cooperatives	Trust-building required; use of community intermediaries, anonymity assurances, support for regularization and inclusion

Table 7.5: Communication Needs of Group 2 – Broader Vulnerable or Disadvantaged Populations

Stakeholder Group	Language Needs	Preferred Communication Methods	Special Needs / Considerations
Ethnic minorities (e.g., Roma, Egyptians)	Romani, Montenegrin	Translated materials, oral communication via facilitators, local Roma NGO outreach	Use of cultural mediators, visual communication, ensure non-discriminatory setting and trust
Persons with disabilities / low literacy	Montenegrin, audio/visual formats	Audio recordings, illustrated flipcharts, home visits	Ensure physically accessible venues, tactile formats, one-on-one support if needed
Underserved coastal rural communities	Montenegrin, Albanian (where applicable)	Mobile consultation units, village meetings, flyers at local grocery and religious points	Flexible scheduling, in-person outreach, community liaison involvement
Elderly smallholders and pensioners	Montenegrin	Local radio broadcasts, printed leaflets, telephone hotlines	Simple language, large fonts, direct verbal communication during outreach
Youth not in employment, education, or training (NEET)	Montenegrin	Social media campaigns, peer facilitators, NGO youth ambassadors	Emphasis on two-way engagement, incentivized participation, embedded skills development content

7. Stakeholder Engagement Program

7.1 Purpose and Timing of Stakeholder Engagement Program

The Stakeholder Engagement Program under the CRFASD Project is designed in line with the objectives of the World Bank's Environmental and Social Framework (ESF), specifically Environmental and Social Standard (ESS) 10 on Stakeholder Engagement and Information Disclosure. The engagement program is aimed at fostering open, inclusive, and continuous communication and collaboration with all stakeholders throughout the project lifecycle.

The key objectives of the Stakeholder Engagement Plan (SEP) are:

- ✓ To identify stakeholder roles and responsibilities and ensure their participation throughout the project cycle;
- ✓ To establish a systematic approach to stakeholder engagement and maintain constructive relationships with stakeholders, especially project-affected parties;
- ✓ To assess the level of stakeholder interest and support for the project and reflect stakeholder views in project design and implementation;
- ✓ To promote and provide opportunities for effective and inclusive engagement on issues that could potentially affect stakeholders;
- ✓ To ensure timely, understandable, and accessible information disclosure on environmental and social risks and impacts, particularly for disadvantaged or vulnerable groups;

- ✓ To provide accessible and inclusive means for stakeholders to raise issues and grievances and to ensure project responsiveness;
- ✓ To clearly define means and frequency of engagement for each stakeholder group;
- ✓ To allocate appropriate resources and budget for effective implementation of the stakeholder engagement and monitoring activities.

Engagement activities will use a range of methods suitable for different stakeholder groups, including: community meetings, printed and electronic media, radio broadcasts, focus groups, surveys, phone calls, emails, and social media updates.

7.2 Information Disclosure

Information disclosure is a core component of the CRFASD Stakeholder Engagement Plan (SEP), in accordance with the World Bank Environmental and Social Standard (ESS) 10. The objective is to ensure that all relevant environmental, social, technical, and institutional information is shared with stakeholders in a timely, inclusive, accessible, and culturally appropriate manner throughout the project lifecycle.

Given the dual structure of the CRFASD Project—comprising both **hard infrastructure investments** (e.g., fishing port, ABP facility, Paying Agency offices) and **soft institutional investments** (e.g., systems development, regulatory reform, capacity building)—the disclosure strategy is divided into two differentiated streams. Each is tailored to reflect the nature and scope of project activities, the type of ESF instruments involved, and the appropriate engagement methods.

This approach ensures that:

- Affected persons and vulnerable groups receive adequate information on infrastructure works and associated impacts.
- Institutional stakeholders and beneficiaries are informed and able to contribute meaningfully to policy reforms, technical improvements, and capacity-building efforts.

Disclosure Strategy for Hard Infrastructure Components

The disclosure of environmental and social information for hard infrastructure components under the CRFASD Project—including the construction of the climate-resilient fishing port in Ulcinj, the Animal By-Product (ABP) facility in Nikšić, and the rehabilitation of Paying Agency Regional Offices (PAROs) in Bar and Nikšić—will be carried out in accordance with the World Bank Environmental and Social Standard (ESS) 10 and national requirements. The objective is to ensure timely, transparent, inclusive, and culturally appropriate communication with all stakeholders.

The disclosure strategy for these hard investments will consist of the following key actions:

Public Disclosure of ESF Instruments:

The following Environmental and Social Framework (ESF) instruments will be disclosed to the public:

- Environmental and Social Management Framework (ESMF)
- Stakeholder Engagement Plan (SEP)
- Resettlement Policy Framework (RPF)
- Labor Management Procedures (LMP)
- Environmental and Social Commitment Plan (ESCP)
- Environmental and Social Impact Assessments (ESIAs) and site-specific Environmental and Social Management Plans (ESMPs) for individual infrastructure investments.

Methods of Disclosure:

- Uploading all finalized ESF documents on the official websites of the Ministry of Agriculture, Forestry and Water Management (MAFWM), Project Management Team (PMT), and World Bank.
- Printing and making available copies at key municipal offices (Ulcinj, Bar, Nikšić).
- Disseminating key summaries and notifications through local media (radio, newspapers, TV broadcasts) and municipal noticeboards.
- Providing printed materials and simplified summaries in accessible formats, including visual aids and oral interpretation for low-literacy and vulnerable groups.
- Providing printed materials to community and directly affected people closer to the proposed sites.
- Distributing printed information materials on the Grievance Redress Mechanism (GRM), including brochures and leaflets, in nearby communities likely to be directly affected.
- Installing physical displays of GRM channels (posters, signboards, notice boards) at and around construction sites, municipal offices, port areas, and other accessible community spaces, to ensure PAPs know how and where to submit grievances.

Languages and Accessibility:

- Disclosure materials will be provided in **Montenegrin and English**.
- In Ulcinj Municipality, where a significant proportion of the population speaks Albanian, **translations or oral interpretation into Albanian** will be offered during consultations.
- In Nikšić and nearby rural areas, where Roma communities are present, **adapted outreach measures** (including verbal communication or simplified materials) will be used to ensure accessibility.
- Disability-friendly formats (audio files, large print, accessible PDFs) will be made available upon request.

Timing:

- Disclosure of the ESMF, SEP, LMP, and ESCP will take place **before project Appraisal**.
- Disclosure of site-specific ESIA and ESMPs for each sub-project will occur **prior to commencement of construction activities** at respective sites.
- GRM channels and contact information will be disclosed before the start of consultations and any site activities.

Target Groups:

- Project-Affected Persons (PAPs) including small-scale fishers, farmers, agribusiness operators, local households.
- Vulnerable and disadvantaged groups (informal fishers, women, Roma, low-income rural populations).
- Local government authorities, NGOs, civil society organizations (CSOs), and the general public.

Additional Awareness campaign and consultation for the Fishing Port Facility

Public consultations for the Ulcinj Fishing Port during the EIA and ESIA phase were last carried out in 2020 and 2021. Given the time elapsed and the subsequent evolution of project design and environmental and social risk management requirements, an updated consultation process is required.

This updated consultation will:

- Be organized by the PMT in cooperation with MAFWM and the Ulcinj Municipality ;
- Take place **prior to Project Appraisal**, in order to ensure that stakeholder feedback is reflected in project preparation and World Bank clearance processes;
- Serve as a platform to present the most recent ESIA findings, site-specific mitigation measures, and the draft and grievance arrangements associated with the Fishing Port;
- Provide affected communities with an opportunity to raise concerns or provide input on the updated design, environmental and social measures, and implementation timeline.

- Raise any additional concern,
- Inform the supplement ESIA which is under development,

Documentation:

- Detailed records of the updated consultation, including participant lists, minutes of meetings, photographs, and copies of information materials, will be prepared by the PMT.
- These records will be **attached as annexes to the final SEP** and disclosed publicly in line with ESS10 requirements.

Objectives of the Updated Consultation:

- Re-confirm the main environmental, social concerns raised during the past stakeholder engagement and consultation (by fishers, vendors, local households, etc.);
- Ensure that vulnerable groups (including informal fishers, seasonal vendors, and women engaged in fisheries-related activities) have a voice in the consultation process;
- Provide updated information on project timelines, grievance redress mechanisms, and compensation/assistance measures (if applicable);
- Document all feedback and clarify how it will be incorporated into the ESIA, SEP, and other relevant project instruments.
- Incorporate feedback into the ESIA Supplement.

Additional Disclosure and Awareness Campaign for the ABP Facility

Recognizing the specific environmental, health, and community sensitivities surrounding the construction and operation of the Animal By-Product (ABP) facility in Nikšić, an additional targeted awareness campaign and **updated consultation** will be carried out **prior to Project Appraisal** and before the formal disclosure of the site-specific ESIA/ESMP for the ABP facility.

This updated consultation will:

- Be organized by the PMT, in cooperation with MAFWM and the Nikšić municipal authorities;
- Be tailored to the needs of Vulnerable groups specifically the Roma community living nearby the intended site for the ABP,
- Take place **before Appraisal** to ensure that stakeholder feedback is formally documented and reflected in the preparation of final project instruments;
- Serve as a platform to present project objectives, anticipated environmental and social impacts, odor and environmental control measures, and project-specific grievance arrangements;
- Provide affected communities and stakeholders with the opportunity to raise concerns, ask questions, and propose mitigation or monitoring measures.

Documentation:

Detailed records of this updated consultation—including minutes of meetings, participant lists, photos, and distributed information materials—will be prepared by the PMT; This documentation will be attached as annexes to the final SEP and disclosed publicly in line with ESS10 requirements.

Objectives of the Awareness Campaign:

- Raise public understanding of the **health, environmental, and economic importance** of safe ABP management.

- Inform stakeholders about the **planned operations, safeguards, and odor and environmental controls** associated with the ABP facility.
- Address any community concerns regarding potential environmental, health, or nuisance risks.
- Build **early trust and acceptance** among rural communities and potentially affected groups.

Communication Methods:

- Community meetings in Nikšić and surrounding rural municipalities.
- Printed leaflets, visual posters, and local radio information broadcasts.
- Mobile outreach units to engage remote households.
- Verbal/audio materials and in-person explanations for low-literacy and vulnerable groups.

Special Focus:

- Targeting vulnerable rural populations with low access to information.
- Ensuring information is culturally appropriate, accessible, and available in formats suitable for communities with literacy barriers.

Importance:

- This proactive awareness initiative is critical to mitigating misinformation, reducing community resistance, and informing risk management and operational safety planning for the ABP facility.
- It complements the formal disclosure and consultation requirements under the World Bank ESF and strengthens the social sustainability of the Project.

Table 8.2.1: Information Disclosure – Hard Infrastructure Investments

Project Stage	Documents / Information to be Disclosed	Disclosure Methods	Location, Language & Accessibility	Target Stakeholders	Responsible Entities
Project Preparation	Environmental and Social Management Framework (ESMF), Resettlement policy Framework (RPF), Stakeholder Engagement Plan (SEP), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP), Environmental and Social Review Summary (ESRS)	Upload to MAFWM, PMT, and World Bank websites; print copies at municipal offices; media outreach; social media announcements	Montenegrin and English; printed and digital formats; accessible versions for low-literacy groups available in Ulcinj, Bar, Nikšić, and Podgorica.	General public, PAPs, local municipalities, NGOs, vulnerable groups	PMT, MAFWM
Preliminary Awareness Campaign for ABP Facility	Informational materials on ABP facility objectives, health/environment	Community meetings, mobile information	Montenegrin; adapted formats for low-literacy populations;	Potentially affected communities near proposed	PMT, MAFWM, Municipalities

	al benefits, safeguards, odor control measures, Grievance Mechanism for the Project	units, printed leaflets, local radio broadcasts, visual posters	verbal/audio delivery for isolated rural areas; in-person outreach in Nikšić and nearby municipalities	ABP sites; rural households; vulnerable and low-literacy groups	
Updated Consultation for Ulcinj Fishing Port (FPP)	Updated ESIA findings and mitigation measures; potential resettlement/land-use impacts; Port-specific GRM procedures Environmental and Social Management Framework (ESMF), Resettlement policy Framework (RPF), Stakeholder Engagement Plan (SEP), Environmental and Social Commitment Plan (ESCP), Labor Management Procedures (LMP), Environmental and Social Review Summary (ESRS)	Public consultation meetings in Ulcinj; targeted focus group discussions with local community, fisher associations, CSO, seasonal vendors, and tourism operators; disclosure at municipal office and port facilities; media/social media announcements	Montenegrin and Albanian (as needed); simplified executive summaries; printed copies at Ulcinj Municipality and Port Authority office; accessible formats (PPT/visuals/audio) for low-literacy groups	Fisher communities and associations; seasonal vendors; local businesses; municipal representatives; NGOs; vulnerable households Hospitalities, restaurants and other tourism service providers	PMT, MAFWM, Ulcinj Municipality, Port Authority
ESIA/ESMP/RAP Preparation & Appraisal	Environmental and Social Impact Assessments (ESIAs), Environmental and Social Management Plans (ESMPs) and Resettlement Action Plans (RAPs)	Public scoping sessions, public hearings, surveys; dissemination through municipal offices, websites, local newspapers	Montenegrin and English; simplified executive summaries for low-literacy audiences; translated versions in Albanian and Romani as needed	Local communities, fisher groups, municipal representatives, NGOs, vulnerable populations	PMT, Environmental Consultants, EPA
Pre-Construction Phase	Final construction schedules, site-specific mitigation measures, grievance mechanisms, traffic/access updates, health and safety information	Posters at community centers, SMS alerts, local radio announcements, direct briefings at municipal offices	Local languages (Montenegrin, Albanian if needed); visual/audio support for low-literacy individuals; accessible materials for	PAPs, seasonal vendors, small businesses, fisher associations, tourists, workers	PMT, Contractors, Municipalities

			persons with disabilities		
Implementation & Monitoring Phase	ESMP monitoring updates, grievance records, social and environmental performance summaries	Dashboard updates, community feedback meetings, project website postings, media bulletins	Accessible public dashboards (simple visuals and infographics); print and digital disclosure in Montenegrin and English	Affected communities, local governments, CSOs, World Bank supervision teams	PMT M&E Officer, Supervision Consultants, WB Team

Disclosure Strategy for Soft Institutional Components

These measures do not involve physical works or direct environmental risks. Accordingly, the focus of disclosure is on transparency in institutional reforms, eligibility criteria for support, and stakeholder participation in policy and system design.

Table 8.2.2: Information Disclosure – Soft Institutional Investments

Project Stage	Documents / Information to be Disclosed	Disclosure Methods	Location & Language	Target Stakeholders	Responsible Entities
Preparation & Design	Institutional reform roadmaps, capacity assessments, IACS updates, draft policy documents	Online publications, stakeholder briefings, thematic newsletters, technical meetings	Montenegrin and English; websites and PMT communication channels	MAFWM directorates, Paying Agency, AFSVPA, producer associations, CSOs	PMT, MAFWM
Rollout & Implementation	Guidelines for registry access, training programs, TA opportunities	Leaflets at extension offices, digital campaigns, online tutorials, info desks	Plain language, simplified visual formats; Montenegrin and Albanian (as needed)	Agrifood SMEs, fishers, rural cooperatives, vulnerable applicants	PMT, Extension Services
Monitoring & Feedback	Updates on institutional reforms, user satisfaction surveys, training results, complaints received and resolved	Online dashboards, community feedback forms, CSO forums, social media	Local and national media channels, project website	Civil society, partner institutions, WB, EU	PMT M&E Team, WB Task Team

Additional Notes on Language and Accessibility

All disclosed materials will be translated into English and Montenegrin, and Albanian and Romani versions will be made available when necessary to reach Roma, Egyptian, and Albanian-speaking communities. Where literacy or digital access is limited, audio materials, pictorial content, oral briefings, and mobile outreach will be used.

Print versions of all core documents will be made available at:

- PMT offices
- MAFWM
- Municipal offices in Ulcinj, Bar, and Nikšić
- Fisheries cooperatives and extension service centers

Social media (e.g., Facebook, WhatsApp, Viber), SMS notifications, and radio announcements will complement digital disclosure.

7.3 Proposed Strategy for Stakeholder Engagement

The Stakeholder Engagement Plan (SEP) for the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project defines a structured, inclusive, and participatory approach to engaging stakeholders across the full project lifecycle. It outlines the tools and methodologies to be applied to provide transparent information, solicit meaningful feedback, and ensure the participation of all stakeholder categories—including project-affected parties (PAPs), interested institutions, civil society actors, and vulnerable or disadvantaged groups.

Engagement activities will be tailored based on each stakeholder group's characteristics, geographic location, literacy and language needs, accessibility barriers, and level of influence or interest in the project. The SEP differentiates between:

- **Hard infrastructure investments** (e.g., the Fishing Port, ABP facility, and Paying Agency offices), which require formal consultation procedures aligned with Montenegrin national legislation and the World Bank's Environmental and Social Framework (ESF). These consultations will cover the preparation and disclosure of Environmental and Social Impact Assessments (ESIAs) and Environmental and Social Management Plans (ESMPs), Grievance management specific to the site and project, as well as site selection processes, timelines of works, and mitigation of potential construction-related impacts.
- **Soft institutional investments** — such as technical assistance (TA), capacity building, regulatory development, and systems modernization — will rely on flexible, participatory, and adaptive stakeholder engagement approaches. Engagement under these activities will focus on knowledge dissemination, consultation on regulatory reforms, institutional strengthening, and supporting inclusive policy dialogue to ensure that the outputs are contextually appropriate, broadly accepted, and aligned with EU accession objectives.

Stakeholder engagement will also vary depending on the phase of the project, ensuring continued, adaptive communication and feedback loops during:

1. **Project Preparation Phase** – Identification of stakeholders, early consultations to inform project design and risk scoping, and initial disclosure of safeguard instruments (ESMF, SEP, RPF, ESCP, LMP).
2. **Implementation Phase** – Ongoing engagement with PAPs and other stakeholders through consultations on site-specific interventions, construction updates, training opportunities, and operational planning.
3. **Monitoring and Evaluation Phase** – Regular sharing of project results, progress on environmental and social commitments, citizen feedback, and endline evaluations.
4. **Closure Phase** – Dissemination of final achievements, sustainability plans, and formal consultations to gather lessons learned and evaluate stakeholder satisfaction.

A range of communication and engagement tools will be used, including but not limited to:

- Public consultation meetings and focus groups (in-person and hybrid formats)
- Site information desks
- Community information sessions and site visits
- Thematic stakeholder workshops and roundtables
- Distribution of printed materials (leaflets, brochures, posters)
- Media campaigns via local radio, TV, newspapers, and digital platforms
- Use of official websites, municipal noticeboards, and mobile information units
- Online surveys, telephone interviews, and SMS-based updates
- Digital communication via email, social media, and messaging applications (e.g., WhatsApp, Viber)

To ensure inclusive and equitable stakeholder participation, the project will apply the following principles:

- **Culturally appropriate and gender-sensitive approaches**, including separate focus groups where needed;
- **Use of local languages and accessible formats** (e.g., simplified texts, infographics, and audio-visual materials);
- **Dedicated outreach to vulnerable groups**, including mobile consultations and home visits where necessary;
- **Accessible venues and communication channels** for persons with disabilities;
- **Confidential grievance and feedback mechanisms**, with clear response protocols.

The CRFASD project is committed to upholding the World Bank's principles of transparency, inclusiveness, and zero tolerance for reprisals. Stakeholders will be engaged in a respectful and safe environment, where their concerns and opinions are valued and integrated into project decision-making processes. As part of this stakeholder engagement strategy, a targeted public awareness campaign will also be conducted prior to the site-specific ESIA/ESMP disclosure for the Animal By-Product (ABP) Facility. This early outreach measure will aim to improve community understanding of Animal By-Product management, support informed consultation on site selection, and strengthen risk mitigation planning.

Table8.1: Proposed Strategy for Stakeholder Engagement – Hard Infrastructure Component

Project Phase	Target Stakeholders	Engagement Objectives	Engagement Methods	Responsible Parties	Frequency / Timing
Site Selection and Early Design Consultation	Project-Affected Persons (PAPs), local communities near potential ABP facility site, fisher households, Ulcinj Municipality	Consult on proposed site alternatives for ABP Facility and detailed design for Fishing Port; gather feedback on environmental and social risks; inform design refinement; raise early awareness about ABP management And fishing port management	Focus group discussions; participatory site visits; targeted stakeholder consultations; public notices in municipalities; Preliminary Awareness Campaign for ABP Facility (community meetings, informational leaflets, local media broadcasts, mobile information units), updated information campaign for Ulcinj port	PMT, ESIA Consultants, MAFWM, Municipalities	Q2–Q3 2025

Preparation (ESIA/ESMP/RAP Development)	PAPs, local communities, informal vendors, fisher associations, municipal authorities	Introduce final selected sites and infrastructure plans; identify specific environmental and social risks; gather input to inform ESIA/ESMP/RAP preparation	Public scoping meetings; socio-economic surveys; community consultations; site observations; printed materials	PMT, ESIA Consultants, MAFWM, Municipalities	Q3–Q4 2025
Disclosure and Appraisal of ESIA/ESMP/RAP	General public, CSOs, MAFWM, EPA, EPA Commission, World Bank	Disclose draft ESIA/ESMP findings; validate mitigation measures; solicit feedback	Public hearings; newspaper notifications; online disclosure (MAFWM, EPA websites); physical copies at municipal offices	PMT, MAFWM, EPA	Q1–Q2 2026
Pre-Construction Phase	Directly affected community stakeholders, construction-affected residents, seasonal vendors, local businesses	Inform about construction start dates, traffic/access changes, grievance channels, and safety measures	Local radio announcements; SMS alerts; posters at community boards; consultation briefings	Contractors, PMT, Municipalities	1–2 months before construction
Construction and Implementation Phase	Directly and indirectly affected community stakeholders (e.g., fisher cooperatives, local vendors)	Communicate updates on construction activities, access restrictions, mitigation measures, local employment opportunities	Site-level consultations; mobile information units; GRM brochures; contractor information desks; dedicated hotlines, Site information boards	PMT, Supervision Consultant, Contractors	Monthly or quarterly during construction (2026–2028)
Post-Construction Monitoring and Evaluation Phase	Local government, CSOs, community monitors, World Bank	Report on ESMP, SEP and RAP implementation; gather feedback on community satisfaction; identify corrective actions if needed	Participatory monitoring meetings; community scorecards; project website updates; public feedback sessions	PMT M&E Officer, WB Supervision Team	Annually and at project mid-term/final reviews

Table 8.2: Proposed Strategy for Stakeholder Engagement – Soft Institutional Components

Project Phase	Target Stakeholders	Engagement Objectives	Engagement Methods	Responsible Parties	Frequency / Timing
Preparation	DfP, AFSVPA, PA regional staff, producer cooperatives,	Assess institutional capacity needs, validate priorities, inform	Technical meetings, thematic roundtables,	PMT, MAFWM, Consultant Teams	Q2–Q4 2024

	NGOs, agrifood SMEs	stakeholders on reforms	online surveys, interviews		
Design & Rollout	Agricultural and fisheries cooperatives, extension services, women's associations	Provide updates on IACS system, ABP protocols, and training modules	Regional info sessions, leaflets in extension centers, online platforms	PMT, MAFWM, Municipal Agriculture Units	Bi-annual (2025–2027)
Implementation	Registered and informal fishers, agrifood MSMEs, vulnerable groups	Facilitate training, technical assistance, and access to registry platforms	Focus groups, door-to-door outreach, translated guidance material, WhatsApp groups	PMT, Municipalities, Extension Services	Ongoing (quarterly updates)
Monitoring & Feedback	Institutional stakeholders, cooperatives, PA staff, CSOs	Track adoption of reforms, system performance, stakeholder feedback	Online feedback forms, focus group discussions, M&E scorecards, regional consultation	PMT M&E Team, WB Task Team	Annual reports, feedback loops (2026–2029)

7.4 Proposed Strategy/Differentiated Measures to Include the Views of And Encourage Participation by Vulnerable Groups

In alignment with Environmental and Social Standard (ESS) 10 and the World Bank's Gender Strategy and Inclusion Framework, the CRFASD Project commits to inclusive engagement of vulnerable and disadvantaged groups throughout the project lifecycle. Specific measures are designed to address the social, economic, geographic, and institutional barriers these groups face—ensuring they are informed, consulted, and enabled to participate meaningfully in consultations, decision-making processes, and access to project benefits.

This strategy is grounded in the vulnerability analysis conducted under the SEP and tailored to both hard investments (e.g., port, ABP facility) and soft interventions (e.g., training, capacity building). Special attention will be given to groups at risk of exclusion due to gender, ethnicity, disability, low education, remoteness, or informal status.

Below is the proposed strategy for inclusive engagement of each vulnerable stakeholder group:

Table 8.3: Proposed Strategy for Stakeholder Engagement of Vulnerable / Disadvantaged Group

Vulnerable / Disadvantaged Group	Targeted Engagement Strategy
Women-headed fisher households and women in agrifood/fisheries	<ul style="list-style-type: none"> • Coordinate with Women's NGOs and female-led producer groups to conduct gender-responsive consultations. • Provide childcare support, safe meeting spaces, and flexible scheduling. • Deliver targeted communication materials highlighting participation opportunities and business support for women. • Facilitate female representation in port/PA user committees and training programs.
Economically marginalized fishers and farmers	<ul style="list-style-type: none"> • Collaborate with municipal social services, fishing cooperatives, and NGOs to identify and invite economically vulnerable households. • Disseminate simplified information on benefits through municipal help desks and peer outreach.

	<ul style="list-style-type: none"> • Offer travel stipends or in-kind incentives for participation in consultations or training. • Provide one-on-one support in application processes for soft investment opportunities.
Roma and Egyptian (RE) communities	<ul style="list-style-type: none"> • Engage Roma mediators and local CSOs with established trust networks. • Translate information into Romani and/or use verbal/audio formats where literacy is low. • Use culturally sensitive approaches, including informal group discussions and visual materials. • Ensure access to the GRM and include RE focal points in outreach efforts.
Informal fishers and unregistered operators	<ul style="list-style-type: none"> • Organize informal meetings at landing sites and ports to explain project opportunities and regulatory reforms. • Partner with local associations to support informal fishers in legal registration and benefit access. • Provide simplified visual materials and use community mobilizers familiar with the informal sector.
Elderly rural residents and pensioners	<ul style="list-style-type: none"> • Distribute printed bulletins and host small-group consultations in community centers. • Enable home visits or use trusted community intermediaries for two-way communication. • Ensure GRM accessibility via phone or municipal offices.
Persons with disabilities / low-literacy individuals	<ul style="list-style-type: none"> • Offer large print, audio, and picture-based communication materials. • Ensure all consultation venues are physically accessible. • Deliver one-on-one verbal briefings and use local facilitators to explain project benefits or grievance processes.
Youth, especially NEET (Not in Employment, Education or Training)	<ul style="list-style-type: none"> • Use youth-focused media (e.g., social media, WhatsApp, local radio) to inform about training and employment options. • Coordinate with vocational institutions, youth clubs, and education departments. • Recruit youth ambassadors to facilitate peer-to-peer outreach.
Isolated rural SMEs and agrifood microenterprises	<ul style="list-style-type: none"> • Engage through local extension agents, PA offices, or Chambers of Commerce. • Use mobile consultation units and cooperative networks to reach underserved locations. • Simplify eligibility criteria and provide remote technical support (phone, Zoom, field clinics).

Monitoring of Inclusion Strategy

Participation by vulnerable groups will be monitored via gender- and vulnerability-disaggregated indicators in the project's Monitoring and Evaluation (M&E) system. Feedback from these groups will be collected through satisfaction surveys, GRM analytics, and periodic stakeholder consultations. Based on this data, engagement methods will be adapted and improved to ensure meaningful inclusion throughout implementation.

Addressing Stakeholder Concerns through Project Design and Implementation

In line with ESS10, the CRFASD Project has committed to the meaningful integration of stakeholder input into both design and implementation. During the project information disclosure stage, any concerns or risks raised by stakeholders will be evaluated and addressed through the application of the mitigation hierarchy—prioritizing avoidance, followed by minimization, mitigation, and, where necessary, compensation. This approach ensures that stakeholder perspectives directly inform the refinement of technical solutions and safeguard measures. Furthermore, during implementation, the Grievance Redress Mechanism (GRM) will serve as an accessible, inclusive, and culturally appropriate tool that enables stakeholders—particularly vulnerable and disadvantaged groups—to communicate concerns interactively. The GRM will facilitate timely and effective responses, strengthening transparency, accountability, and adaptive project management in accordance with good international practice.

Public Comments and Feedback/Reporting to Stakeholders

To promote transparency, accountability, and stakeholder ownership, the CRFASD project will implement a structured, inclusive, and continuous process for collecting and responding to public and stakeholder feedback. This process supports compliance with World Bank Environmental and Social Standard (ESS10) and ensures that stakeholder voices meaningfully inform project design, implementation, and adaptation.

Submission of Feedback

All stakeholders—including project-affected persons, vulnerable and disadvantaged groups, civil society organizations, local governments, and the general public—will be provided at least two (2) weeks to review publicly disclosed environmental and social documents and submit their comments, concerns, or suggestions. Documents subject to public review include:

- Environmental and Social Management Framework (ESMF)
- Stakeholder Engagement Plan (SEP)
- Environmental and Social Commitment Plan (ESCP)
- Labor Management Procedures (LMP)
- Environmental and Social Impact Assessments (ESIAs) / Environmental and Social Management Plans (ESMPs) for hard infrastructure
- Other subproject-specific instruments as applicable

Feedback Channels

Stakeholders may submit input through multiple accessible channels:

- **Written:** Email and postal mail to the PMT or MAFWM
- **Verbal:** In-person meetings, stakeholder consultations, and telephone hotlines
- **Digital:** Project website feedback forms, social media messages (Facebook, WhatsApp, Viber), or SMS

Each method will be supported by appropriate formats (including local languages and visual/audio tools) to enable participation by all stakeholder groups, particularly vulnerable and low-literacy populations.

Designated Focal Points

All feedback will be directed to designated focal points at the **Project Management Team (PMT)**. PMT staff will ensure accurate documentation of all submissions, including verbal input, using structured feedback forms or audio logs. Focal points will also liaise with technical departments, MAFWM, or local governments for resolution as needed.

Review and Response Protocol

- **Acknowledgment:** Submissions will be acknowledged within **three (3)** working days.
- **Review and Action:** PMT and relevant entities will review the input and determine appropriate action.
- **Feedback Loop:** Stakeholders will be informed of the response and any follow-up within **five (5)** working days of internal review.
- **Justification:** If input cannot be incorporated, a clear justification will be communicated.

Reporting Back to Stakeholders

To close the feedback loop and build public trust, the CRFASD project will regularly report to stakeholders on how feedback has been addressed. Reporting will be conducted through:

- **Quarterly community feedback meetings** in Ulcinj, Nikšić, and Bar
- **Public bulletins** and noticeboards at municipal offices and PMT offices
- **Project website and social media updates**
- **Newsletters** distributed through producer cooperatives and local CSOs
- **Anonymized grievance resolution summaries**
- **Accessible formats** (audio-visual content, infographics, translated summaries) to ensure inclusion of vulnerable groups

8. Roles, Responsibilities of Implementing Agencies and Resources for Implementing Stakeholder Engagement Activities

To ensure the effective and timely implementation of the Stakeholder Engagement Plan (SEP) throughout the lifecycle of the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project, sufficient human and financial resources will be allocated under Component 3: Project Management, as defined in the PAD. These resources are necessary to facilitate inclusive stakeholder engagement, communication, grievance redress, and capacity building in line with Environmental and Social Standard (ESS) 10 of the World Bank's Environmental and Social Framework (ESF). Focal points for SEP implementation will be designated at three levels:

At the PMT level: The full-time Social Development Specialist will serve as the lead focal point for SEP implementation, supported by the part Environmental and Social Specialist and M&E. This role will include coordination of stakeholder engagement activities, supervision of grievance redress processes, and reporting to the World Bank.

At the Municipality level: Designated Municipal Focal Points (typically within the municipal administration offices) will act as local entry points for engagement and grievances, maintain local admission desks, facilitate information disclosure, and ensure feedback from affected persons is communicated to the PMT.

At the Contractor level: Each contractor will appoint a dedicated Community Liaison/GRM Officer responsible for day-to-day engagement at construction sites, maintaining grievance logbooks, disclosing project information on-site, and reporting grievances to the PMT for consolidation.

This three-tiered structure ensures that responsibilities are clearly assigned, that affected communities have multiple accessible points of contact, and that stakeholder engagement is carried out consistently and transparently across all levels of project implementation.

8.1 Resource Categories to Be Financed Under the Project Budget:

A. Information Disclosure and Communication

- Translation of key project documents into Montenegrin and English, and into Romani or Albanian for vulnerable groups where relevant.
- Design, printing, and distribution of communication materials (e.g., brochures, flyers, posters, infographics).
- Maintenance and regular updates of digital platforms (e.g., project website, MAFWM page, social media channels).
- Media engagement through local TV, radio, newspapers, and SMS/Viber/WhatsApp channels to disseminate key messages.

B. Stakeholder Consultations and Outreach

- Planning and facilitation of in-person and virtual consultations at national and local levels, including in Ulcinj, Bar, and Nikšić.
- Mobile outreach teams and information desks to reach remote and marginalized groups (e.g., Roma and Egyptian communities, women-headed households, informal fishers).
- Preparation of accessible materials (e.g., picture-based content, large print formats, audio/video materials, Braille if required).

C. Capacity Building

- Training for PMT staff, municipal focal points, and technical working groups on stakeholder engagement methods, inclusive communication, Grievance Management and ESS10 compliance.

- Gender-sensitive engagement and communication training, including support for facilitators working with disadvantaged groups.
- Awareness-building and training for SEA/SH prevention, code of conduct, response protocols, and survivor-centered approaches.

D. Grievance Redress Mechanism (GRM)

- Establishment and operationalization of the GRM, including IT-based tools, hotline setup, printed intake forms, and reporting templates.
- Community awareness campaigns on how to access and use the GRM, including SEA/SH-specific mechanisms.
- Provision of confidential, safe, and accessible channels to report grievances, including those for vulnerable and at-risk groups.
- A dedicated budget will be allocated under Component 3: Project Management to cover the costs of GRM implementation, including awareness campaigns, capacity building for focal points at PMT/Municipality/Contractor level, IT/hotline operation, printed materials, and SEA/SH-sensitive support services.

Budget Integration and Oversight Mechanisms:

All SEP-related costs will be:

- Reflected in the **Project Implementation Budget** and tracked under Component 3;
- Included in the **Annual Work Plans** and **Procurement Plans**;
- Monitored through the **Monitoring and Evaluation (M&E)** framework to ensure efficient resource use and measurable engagement outcomes.

The Project Management Team (PMT), in coordination with MAFWM, will oversee the planning, allocation, and disbursement of SEP-related resources. Regular implementation reports will include a section dedicated to stakeholder engagement performance, GRM functionality, and budget execution status.

Table 9.1: Stakeholder Responsibilities for SEP implementation

Stakeholder / Institution	Key Responsibilities
Ministry of Agriculture, Forestry and Water Management (MAFWM)	<ul style="list-style-type: none"> - Provide strategic oversight and ensure alignment with EU accession requirements (Chapters 11, 12, 13) - Approve budget allocations and support institutional coordination - Oversee and support implementation of SEP, including the GRM - Maintain high-level communication with stakeholders - Participate in national consultations and disclosure efforts
Project Management Team (PMT)	<ul style="list-style-type: none"> - Lead planning, coordination, and monitoring of SEP implementation - Organize consultations, disclosure of E&S instruments, and community outreach - Ensure functionality and responsiveness of the Grievance Redress Mechanism (GRM) - Maintain the SEP database, document engagement activities, and track indicators - Revise and update the SEP periodically - Report on SEP and GRM progress to MAFWM and the World Bank
Municipal Governments (Ulcinj, Bar, Nikšić)	<ul style="list-style-type: none"> - Support local consultations, public information dissemination, and GRM intake - Facilitate mobile outreach to vulnerable and remote communities

	- Assist with site access, venue organization, and translation/localization of materials
Technical Services Unit (TSU)	- Provide fiduciary oversight and support procurement of SEP-related activities - Monitor disbursement and budget tracking of engagement-related expenditures
Working Groups (WGs)	-Facilitate subcomponent-level technical coordination, participatory planning, and stakeholder dialogue for key infrastructure investments (e.g., Ulcinj Fishing Port, ABP Facility). -Ensure localized consultations, integration of feedback from affected communities, and adaptive decision-making throughout project implementation.
Civil Society Organizations (CSOs) and NGOs	- Serve as intermediaries to engage vulnerable groups and marginalized communities - Support inclusive consultation, training delivery, and feedback collection - Promote awareness of project benefits and grievance procedures
World Bank Task Team	- Review SEP implementation, disclosure, and compliance with ESS10 - Provide technical support on engagement strategy, GRM, and E&S risk communication - Monitor stakeholder engagement outcomes and adaptive improvements
Project-Affected Parties (PAPs)	- Participate in consultations, community meetings, and project feedback sessions - Use the GRM to report concerns or grievances - Provide feedback on project documents and local implementation impacts
Other Interested Parties (e.g., academia, private sector, media)	- Engage in consultations and awareness events - Provide feedback and support communication of project outcomes - Raise sector-specific concerns or recommendations during implementation

8.2 Human and Financial Resources

Stakeholder engagement and grievance redress under CRFASD will be supported by dedicated staff and adequate financing. All associated costs are reflected under **Component 3: Project Management** in the PAD.

In line with ESS10, an indicative budget for SEP implementation (including stakeholder engagement activities, disclosure, consultations, grievance redress mechanisms, capacity building, and monitoring) will also be provided in this SEP (see Section 8.3). This ensures that sufficient resources are earmarked and transparently allocated for the full lifecycle of engagement and grievance management activities.

Key Resource Categories:

- **Information Disclosure & Communication**
 - Translation into Montenegrin, English, and Romani (as needed)
 - Printing of brochures, posters, infographics
 - Maintenance of the PMT webpage and social media engagement (Facebook, WhatsApp/Viber)
 - Media outreach via local TV, radio, and print channels
- **Stakeholder Consultations**
 - Organization of community meetings and participatory planning sessions
 - Mobile outreach to remote communities and vulnerable groups
 - Provision of refreshments, venue costs, and support facilitators
- **Training and Capacity Building**
 - Training on inclusive and gender-sensitive stakeholder engagement
 - Orientation of local GRM focal points and NGO partners
 - Awareness raising on SEA/SH protocols and E&S risk communication

- **Grievance Redress Mechanism (GRM)**
 - Setup of the GRM registry, hotline, and physical intake tools
 - SEA/SH-sensitive protocols, community information campaigns
 - Travel and mediation support for local grievance resolution

The PMT's Social Development Specialist, to be financed under Component 3, will oversee day-to-day SEP implementation, including communications and outreach. This role ensures internal coordination and supports the mainstreaming of inclusive engagement across all project activities.

8.3 Estimated Budget for SEP Implementation (Indicative)

The estimated SEP budget covers a one-year period within the CRFASD implementation timeframe (2026–2030). The cost estimates are based on prevailing market rates in Montenegro and reflect the essential functions required for effective stakeholder engagement. The budget table is indicative and will be further refined and finalized by the PMT as part of annual planning during project implementation.

Table 9.2: Estimated Budget for SEP Implementation (Indicative, EUR)

Budget Category	Quantity	Unit (EUR)	Cost	Total (EUR)	Remarks
1. Staff & Coordination					
Environmental and Social Specialist (PMT Full-time)	12 months	1,500/month		18,000	Responsible for integrating environmental risk considerations into all SEP-related disclosure and consultation activities; ensures that site-specific ESIA/ ESMPs are disclosed and explained to affected communities; monitors environmental-related grievances in the GRM; supports awareness campaigns on environmental risks (e.g., waste, odor, ABP management).
Social Development Specialist	12	1,200/month		14,400	Leads stakeholder engagement activities as defined in the SEP; ensures inclusion of vulnerable groups in consultations; prepares and maintains the Stakeholder Engagement Log (SEL); coordinates municipal and site-level focal points for GRM; ensures timely disclosure of social instruments (RPF, RAPs, SEP updates).
PMT Travel for Stakeholder Engagement	10 trips	150/trip		1,500	Outreach to Ulcinj, Bar, Nikšić
2. Consultations & Meetings					
Project Launch Events	3 events	1,000/event		3,000	National and local consultations
Focus Group Consultations	6 sessions × 2 rounds	500/session		6,000	Gender-sensitive and inclusive stakeholder dialogues
3. Communication & Media					
Translation and Printing of Materials	Lump sum	—		2,500	Montenegrin, Albanian, Romani as needed
Local Tv, Radio and Social Media Info Spots	Lump sum (2 years)	—		3,000	For vulnerable and rural audience outreach

4. Training & Capacity Building				
SEP / ESF Training for PMT / Contractors	2 sessions	2,000/session	4,000	Covers stakeholder engagement, ESS10, and inclusion
SEA/SH Risk Awareness & Protocol Training	2 sessions	2,000/session	4,000	Focus on GRM response and survivor-centered procedures
5. Stakeholder Feedback Tools				
Midline Stakeholder Survey (M&E)	1 round	2,500	2,500	Collects data on inclusiveness and effectiveness
Endline Stakeholder Survey	1 round	2,500	2,500	Final performance review and impact evaluation
6. Grievance Redress Mechanism (GRM)				
GRM Training for Municipal Focal Points and contractors	2 sessions	1,500/session	3,000	Ulcinj, Bar, Nikšić
GRM Materials (leaflets, intake forms)	Lump sum	—	1,500	Distributed during community outreach
Suggestion Box Installation	10 boxes	100/unit	1,000	Placed in accessible municipal facilities
Site-Based Mediation and Resolution Visits	6 visits	300/visit	1,800	PMT-led resolution with local stakeholders
Digital GRM Registry Setup and Maintenance	1	2,000	2,000	Online case tracking tool
Miscellaneous Logistics for GRM	Lump sum	—	2,000	Printing, airtime, and minor outreach costs
7. General Logistics				
Venue Rentals & Refreshments	Lump sum	—	2,300	Community and consultation events
IT-based tools & Digital Registry Setup	Lump sum	2,000	2,000	Development of an online case tracking and registry system to record, manage, and monitor grievances; supports transparency and systematic reporting as required in the SEP.
Hotline setup & first year operation	Lump sum	3,000	3,000	Establishment of a dedicated project hotline (toll-free where feasible) to provide PAPs and stakeholders with direct access to GRM; facilitates immediate intake of grievances, including SEA/SH-sensitive complaints.
Training of GRM operators (PMT + municipal focal points)	2 sessions	1,000/session	2,000	Capacity building for PMT staff, municipal focal points, and contractor representatives on grievance intake, registration, reporting, and SEA/SH-sensitive handling, ensuring alignment with SEP procedures.

TOTAL ESTIMATED BUDGET			82,000 EUR	All costs are indicative and aligned with CRFASD PAD Component 3
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8.4 Monitoring and Reporting

The PMT's Monitoring and Evaluation (M&E) Officer will track stakeholder engagement performance, using the following indicators:

- Number of stakeholder engagement events conducted (disaggregated by gender and vulnerability)
- Number of stakeholders reached (by type and location)
- Volume of grievances received and resolution rate
- Number of grievances received by different intake points
- Number of Grievances received and Resolved within stipulated time
- Feedback from satisfaction surveys and consultations
- Timely disclosure of documents and project updates

Annual and Semi-Annual Implementation Progress Reports to the World Bank will include a dedicated section on the Stakeholder Engagement Plan (SEP) implementation status and the functioning of the Grievance Redress Mechanism (GRM), summarizing key engagement activities, grievances received and resolved, and any major issues or adaptations needed.

9. Grievance Redress Mechanism

The Grievance Redress Mechanism (GRM) for the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project is designed to address concerns and grievances from all project stakeholders—especially affected persons—in a transparent, accessible, timely, and fair manner. It allows individuals and groups to raise complaints, suggestions, or concerns regarding any aspect of project design or implementation. In line with the World Bank's Good Practice Note on SEA/SH (2020), the GRM will integrate survivor-centered protocols for addressing SEA/SH-related grievances. These include ensuring confidentiality, allowing anonymous complaints, referral to appropriate support services, and engagement of trained personnel. A brief digest of SEA/SH grievance handling procedures is included in Annex 3.

9.1 Scope of the GRM

The Grievance Redress Mechanism (GRM) for the CRFASD Project is a practical and simple process for receiving, evaluating, and resolving concerns raised by individuals, groups, or institutions who may be affected by or have an interest in the Project. It ensures that grievances are addressed in a timely, transparent, culturally appropriate, and non-retaliatory manner across all phases of Project implementation.

The GRM will serve both hard investments (such as construction of the fishing port in Ulcinj, the Animal By-Product (ABP) facility, and the establishment of Paying Agency Regional Offices) and soft investments (such as institutional strengthening, technical assistance, grant administration, and support to the Integrated Administration and Control System – IACS).

Distinct and context-appropriate grievance channels will be maintained for different types of interventions, while consistently adhering to the principles of accessibility, confidentiality, and accountability.

Grievances may include, but are not limited to:

- Environmental or social impacts from infrastructure activities (e.g., dust, noise, traffic disruption, water use, construction nuisances);
- Exclusion or inequity in access to training, technical assistance, services, or project benefits;
- Errors or delays in benefit allocation (e.g., producer advisory support or grant distribution);
- Misconduct by Project staff, contractors, or officials;
- Gender-based violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH);
- Marginalization or discrimination against vulnerable or disadvantaged groups;
- Labor-related issues, such as unsafe working conditions, wage disputes, violation of worker rights, or occupational health and safety concerns.

For labor-related grievances specifically: A separate Workers' Grievance Mechanism (WGM) will be established under the Project in accordance with the Labor Management Procedures (LMP). The WGM will ensure that all Project workers—including direct workers, contracted workers, and primary supply workers—have access to an independent, confidential, and effective mechanism for submitting workplace-related grievances. Issues raised through the WGM will be processed independently of the broader Project GRM, following procedures tailored to labor standards, non-retaliation principles, and protections for whistleblowers.

The GRM will uphold the following principles:

- **Accessibility:** The mechanism will be available to all stakeholders, including women, youth, Roma and Egyptian communities, persons with disabilities, and individuals with limited literacy or access to technology. Submissions may be made in-person, online, by phone, or anonymously.
- **Confidentiality:** Complainants may request that their identity, the content of their complaint, and even the existence of their complaint remain confidential. Sensitive cases—particularly SEA/SH-related grievances—will

be handled through separate, secure channels and never recorded in public logs. The identity of complainants will never be disclosed without consent.

- **Protection from Retaliation:** The GRM incorporates strict non-retaliation protocols. Retaliation against complainants—whether by employers, contractors, peers, or public officials—will be treated as a serious grievance itself. Clear referral mechanisms will be established for such cases.
- **Responsiveness and Fairness:** Complaints will be acknowledged promptly, assessed impartially, and resolved within predefined timelines. The mechanism will include the option for appeal and escalation, including to the World Bank's Grievance Redress Service (GRS) if necessary.
- **Survivor-Centered SEA/SH Procedures:** The GRM will provide safe, confidential, and survivor-centered procedures for handling SEA/SH complaints. Survivors will be referred to trained service providers and offered access to legal, health, psychosocial, and protection services, in line with national protocols and World Bank guidance (ESIRT). Only limited, non-identifying details will be recorded, and action will proceed only with the survivor's informed consent.
- **Distinction of Complaint Types:** The GRM will maintain distinct protocols for:
 - Community-level and infrastructure grievances related to hard investments (e.g., construction impacts, access disruptions, environmental nuisances);
 - Programmatic grievances related to soft investments (e.g., concerns about grant eligibility, training opportunities, or access to technical assistance);
 - Labor grievances, which will be addressed through a separate Workers' Grievance Mechanism (WGM), established under the Labor Management Procedures (LMP). The WGM will provide all project workers—including direct workers, contracted workers, and primary supply workers—with an independent, confidential, and accessible channel for workplace-related complaints (e.g., unsafe working conditions, wage disputes, non-compliance with labor standards);
 - SEA/SH-related complaints, which will be handled through survivor-centered, confidential, and specialized pathways, following World Bank good practice and ethical guidelines.

Grievances will be initially addressed at the project level by the Project Management Team (PMT), with the Social Development Specialist acting as the GRM focal point responsible for intake, coordination, and preliminary resolution.

If a complainant is dissatisfied with the initial response, the grievance may be escalated for second-tier review within the PMT. This escalation will involve reassessment by the PMT Project Coordinator and relevant senior technical staff, who will review the case independently and propose a final project-level resolution.

If the complainant remains dissatisfied after the second-tier review, they will be informed of their right to seek redress through Montenegro's judicial or administrative systems, without restriction or prejudice.

9.2 GRM Structure

The Grievance Redress Mechanism (GRM) under the Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project will operate throughout all phases of project implementation—planning, construction, operation, and monitoring. The GRM aims to ensure timely, transparent, and equitable resolution of complaints and feedback from all stakeholder groups, with a particular focus on vulnerable and disadvantaged persons, including women engaged in the fisheries and agrifood sectors.

The GRM structure is built on the following key principles:

- Multi-tiered grievance intake and resolution (local and central levels)
- Clear institutional roles and responsibilities
- Dedicated grievance channels, including SEA/SH pathways
- Confidentiality and non-retaliation guarantees
- Systematic tracking, reporting, and learning

9.2.1 Multi-Tier Operation and Local/Central Access

The Grievance Redress Mechanism (GRM) for the CRFASD Project will function through a **multi-tiered structure** designed to ensure effective intake, tracking, and resolution of grievances at both the **local and central levels**. This structure is tailored to the dual nature of the Project—encompassing both hard (infrastructure) and soft (institutional and policy) investments—and ensures coverage across geographic areas and stakeholder groups.

Local Level Access

At the local level, grievance collection and initial resolution will be facilitated by municipal focal points appointed in the three main project municipalities: Ulcinj, Nikšić, and Bar. These focal points will be housed within municipal offices and/or key implementing partners such as the Directorate for Fisheries (DfF) and the Authority for Food Safety, Veterinary and Phytosanitary Affairs (AFSVPA). Their role will be to:

- Receive grievances through verbal, written, or digital submissions;
- Log complaints into the secure GRM registry;
- Provide immediate guidance or resolve minor issues locally when feasible;
- Coordinate with the Project Management Team (PMT) to escalate unresolved or sensitive cases.

Additionally, construction companies and supervision engineers contracted for hard infrastructure works (e.g., the fishing port, ABP facility, Paying Agency offices) will appoint site-based GRM contact persons responsible for:

- Informing workers and local communities about the grievance mechanism;
- Recording complaints on labor-related matters or civil works impacts;
- Referring cases to the municipal or central-level focal points as needed.

Grievance submission points will be clearly marked and accessible at municipal offices, construction sites, project information boards, and through designated community facilitators. The aim is to ensure timely and culturally appropriate engagement with affected persons, particularly in communities with vulnerable groups such as women in fisheries, informal workers, and rural producers.

Central Level Access

At the central level, overall coordination and oversight of the GRM will be led by the Project Management Team (PMT) under the Ministry of Agriculture, Forestry and Water Management (MAFWM). Within the PMT, the Monitoring and Evaluation (M&E) Specialist will serve as the designated GRM Coordinator, responsible for:

- Maintaining the digital grievance database and documentation system;
- Screening, assigning, and tracking grievances in accordance with defined protocols;
- Liaising with municipal focal points, contractors, and technical agencies;
- Coordinating responses with the PMT Project Director and legal advisor;
- Ensuring regular reporting and analysis of grievance trends.

For fiduciary-related grievances (e.g., procurement disputes, allegations of favoritism in selection, financial transparency concerns), the Technical Services Unit (TSU) under the Ministry of Finance may be consulted to provide clarification or initiate internal audit procedures. The TSU's participation reinforces transparency and accountability in the management of public resources under CRFASD.

Working Groups (WGs) and Sectoral Focal Points

The Working Groups (WGs) established for the Ulcinj fishing port and Nikšić ABP facility components will also play a key role in grievance resolution. As multi-stakeholder coordination bodies, the WGs can:

- Mediate disputes that require interagency cooperation;
- Provide technical or regulatory input into complex grievances;
- Assist with stakeholder dialogue where infrastructure impacts require joint decisions.

Each WG will include representatives from MAFWM directorates, municipal authorities, and sectoral experts, thereby enhancing the problem-solving capacity of the GRM.

Special Protocols for SEA/SH and Vulnerable Groups

All tiers of the GRM will adhere to strict protocols for confidentiality, survivor-centered response, and protection from retaliation, particularly in relation to grievances involving Sexual Exploitation and Abuse (SEA) or Sexual Harassment (SH). Complainants may request that their identity, complaint details, or even the existence of a complaint be kept confidential from contractors, local officials, or other parties. To this end:

- SEA/SH complaints will be received through secure and discreet channels, including partner NGOs or specialized service providers;
- Only non-identifiable data will be stored in the grievance log;
- No action will be taken without the informed consent of the survivor;
- Referrals will be made to licensed psychosocial, legal, and protection services, as per Montenegro's national referral system;
- The PMT Gender Focal Point, when assigned, will support oversight of gender-based grievance handling.

9.2.2 Process of Reporting Grievances

To ensure accessibility and inclusivity, the GRM under the CRFASD Project will allow complaints and feedback to be submitted through a variety of locally appropriate and confidential channels. These mechanisms will accommodate the needs of all stakeholders, including vulnerable and disadvantaged groups, women in fisheries, elderly persons, ethnic minorities, and those with disabilities.

Grievances may be submitted through the following channels:

- **In-person:** Submissions can be made at municipal offices in Ulcinj, Bar, and Nikšić, or at the central PMT office within the Ministry of Agriculture, Forestry and Water Management (MAFWM).
- **Written format:** Via letters or physical grievance forms submitted to designated drop-boxes at community locations, PMT, or contractor site offices.
- **Telephone, SMS, or mobile apps:** Dedicated phone numbers and messaging services (e.g., WhatsApp, Viber) will be available to collect feedback quickly, especially from rural areas.
- **Email and online:** A project-specific email address and grievance submission form on the MAFWM or CRFASD project website.
- **Through community intermediaries:** Trained facilitators, NGOs, CSOs, and Working Group (WG) members will be authorized to collect and forward grievances, especially in communities with low literacy or internet access.
- **Contractor-level GRM:** For infrastructure-related issues (e.g., Ulcinj fishing port construction), on-site grievance mechanisms managed by construction contractors will serve as the first point of grievance uptake.

All verbal complaints will be recorded in writing by trained PMT or municipal staff using standardized grievance intake forms, and complainants will be issued a receipt or reference number to track their case if they disclose their identity.

The system will also allow for:

- **Anonymous submissions**, which will be investigated and treated with equal seriousness;
- **Accessible formats**, including large print, Braille, or audio formats, for persons with disabilities or limited literacy;
- **Mobile grievance outreach**, during public consultations and field visits, enabling real-time collection of concerns in remote communities.

A communication and outreach campaign (see Section 10.3) will ensure all stakeholders are informed of their rights and available channels to submit grievances.

9.2.3 Focal Points for Receiving/Recording Grievances

To ensure timely intake and response, each participating institution under the CRFASD Project—including the project PMT along with DfF, PARO's will appoint a designated GRM Focal Point. These individuals will be responsible for:

- Receiving and logging grievances submitted at the institutional or municipal level;
- Coordinating with the PMT for escalation and resolution;
- Participating in training on WB ESF, grievance recording protocols, and confidentiality standards.

All focal points will maintain a grievance log and ensure complaints are documented in a standardized format and forwarded to the PMT for tracking. The PMT M&E Specialist will act as the central GRM Coordinator, ensuring consistency and oversight across all channels.

Ensuring Inclusive and Low-Tech Access to the GRM

To comply with ESS10 and ensure that all stakeholders—including those in remote areas or with limited access to technology—can effectively use the Grievance Redress Mechanism (GRM), the CRFASD Project will offer multiple offline and low-tech grievance submission options. These will include:

- **In-person submission** of grievances at municipal offices or designated PMT/PMT contact points;
- **Suggestion/complaint boxes** placed at key project sites (e.g., fishing ports, ABP facility);
- **Dedicated phone numbers** for calls and SMS submissions, including local language support;
- **Support from community liaison officers** or social specialists who will document oral complaints and submit to PMT on behalf of the complainant;
- **Paper-based grievance forms** distributed through local administrative units and civil society organizations (CSOs) working with vulnerable groups, including the Roma community.

These measures will ensure that the GRM remains **inclusive, culturally appropriate, and responsive** to the needs of all stakeholder groups, particularly those at risk of exclusion due to digital or linguistic barriers.

SEA/SH-Specific Grievance Intake

SEA/SH complaints will follow a specialized, confidential pathway in accordance with the World Bank's survivor-centered approach and ESIRT protocol. Full details on SEA/SH handling are provided under Section 10.1 and summarized here for clarity:

- Designated female focal points will be trained in survivor-sensitive communication;
- Complainants may remain anonymous and provide only the minimum information required for referral;
- Cases will be referred to licensed psychosocial, legal, and health services within Montenegro;
- No SEA/SH case will be investigated or shared without the survivor's explicit, informed consent;
- These cases will be tracked separately and excluded from any public grievance logs or reporting unless anonymized.

9.2.4 Roles and Responsibilities

Table 10.2.6: GRM Roles and Responsibilities by Operational Level

Level	Actor	Key Responsibilities
Local	Municipal Focal Points (Ulcinj, Bar, Nikšić)	- Receive and register grievances from citizens and Project-Affected Persons (PAPs)

		<ul style="list-style-type: none"> - Facilitate local resolution of minor issues - Escalate complex or unresolved cases to the PMT GRM Coordinator
	Directorate for Fisheries (DfF), AFSVPA, Directorate for Payments (DfP)	<ul style="list-style-type: none"> - Serve as institutional focal points for grievances related to fisheries, food safety, veterinary, and payment issues - Provide technical input for grievance resolution
	Construction Companies and Supervision Consultants	<ul style="list-style-type: none"> - Maintain on-site grievance boxes and signage - Inform workers and community members about the grievance process - Record and refer grievances to municipal focal points or PMT
Central (PMT)	PMT Monitoring and Evaluation (M&E) Specialist – GRM Coordinator	<ul style="list-style-type: none"> - Central coordination and oversight of the GRM - Maintain the grievance database and ensure secure documentation - Track, escalate, and report grievances - Liaise with TSU and the World Bank, as needed
	Technical Services Unit (TSU), Ministry of Finance	<ul style="list-style-type: none"> - Provide fiduciary oversight for procurement- or finance-related grievances - Support grievance resolution on financial management and procurement issues
Cross-Cutting	Working Groups (WGs) for Ulcinj Fishing Port and ABP Facility	<ul style="list-style-type: none"> - Advise on site-specific and multi-agency grievances - Facilitate coordination among municipal and sectoral actors for complex cases
SEA/SH Channel	Designated Female Staff and Support Service Providers (e.g., CSWs, NGOs, health/legal providers)	<ul style="list-style-type: none"> - Receive SEA/SH-related grievances through confidential, survivor-centered pathways - Ensure informed consent and non-disclosure - Refer survivors to licensed psychosocial, health, and legal services

9.2.5 Screening, Acknowledgment and Closure of Grievances

All grievances submitted through official GRM channels will be promptly recorded and reviewed. The PMT Monitoring and Evaluation (M&E) Specialist, acting as the central GRM Coordinator, will serve as the primary point of intake, screening, coordination, and resolution tracking.

Grievances received at the local level by municipal focal points will be forwarded to the PMT within one (1) working day.

Upon receipt, the GRM Coordinator will:

- Acknowledge the grievance in writing within three (3) working days, providing the complainant (if identified) with a reference number and an outline of the anticipated timeline for resolution;
- Screen the grievance to determine:
 - (i) Whether the complaint falls within the scope of the GRM;
 - (ii) Whether it can be resolved at the municipal level with support from the PMT; or
 - (iii) Whether the PMT will manage the grievance directly.

The PMT will strive to resolve grievances within thirty (30) working days from acknowledgment. If additional time is required due to complexity, the GRM Coordinator will update the complainant regularly regarding progress and revised timelines.

Grievances will be considered eligible if they relate to:

- Environmental and social risks and impacts;
- Access to project benefits;
- Labor-related issues under the Labor Management Procedures (LMP);
- Allegations of Sexual Exploitation and Abuse (SEA) or Sexual Harassment (SH);
- Procurement or fiduciary concerns.

If a grievance is found ineligible (e.g., not related to the project), the GRM Coordinator will inform the complainant within three (3) working days, explaining the rationale and, if appropriate, referring the complaint to another competent institution.

Closure of grievances will occur when:

- A resolution has been mutually agreed upon and documented;
- Required corrective actions have been completed and verified;
- The complainant has been informed and, where possible, their satisfaction confirmed.

All closed cases will be documented in the grievance registry, including the resolution process, final outcome, and feedback from the complainant where applicable.

Anonymous grievances will be processed with equal diligence. Fraudulent, abusive, or speculative complaints will only be closed after proper review and documentation, providing an opportunity for clarification before final closure.

9.2.6 Appeal Process

If a complainant is not satisfied with the PMT's resolution, they may submit an appeal directly to the Ministry of Agriculture, Forestry and Water Management (MAFWM), specifically addressed to the Secretary General.

Upon receipt of an appeal:

- MAFWM will initiate an internal review in coordination with the PMT and relevant directorates;
- A final decision will be communicated to the complainant within fifteen (15) working days.

Fiduciary or procurement-related grievances requiring special review may involve consultation with the Technical Services Unit (TSU) of the Ministry of Finance. The appeal process does not limit or restrict complainants' access to national judicial or administrative remedies. Complainants may choose at any point to pursue resolution outside the Project's GRM.

9.3 Awareness Raising on GRM

The PMT, led by the Social Development Specialist and supported by institutional focal points and NGOs where needed, will carry out a targeted outreach and awareness-raising campaign to ensure that all stakeholders—especially vulnerable and disadvantaged groups—are fully informed of the GRM's existence, access channels, and protections.

Information will be disseminated using a range of communication platforms, including:

- In-person sessions at launch events, community consultations, and municipal meetings;
- Posters, brochures, and flyers distributed at public offices, health centers, and markets;
- Radio and TV broadcasts in Montenegrin and other locally relevant languages;
- Project website and affiliated municipal platforms;
- Mobile outreach through trusted NGOs and CSOs, especially in rural and remote areas.

- Physical display of GRM channels (posters, signboards, notice boards) on or near project sites, municipal buildings, port facilities, and other accessible community spaces.
- Distribution of printed GM information materials (brochures, leaflets, posters) directly within communities likely to be most affected by sub-project activities, to ensure PAPs know how to submit grievances.

Accessible communication formats (audio, large print, pictorials, and Braille) will be used for individuals with disabilities or low literacy. SEA/SH-sensitive content will be presented discreetly through female facilitators, trusted health workers, or survivor-support partners.

Key outreach priorities include:

- Women in fisheries and agrifood sectors;
- Roma and Egyptian (RE) communities;
- Elderly persons, individuals with disabilities, and informal workers;
- Seasonal laborers and youth with limited formal education.

All members of the GRC and field-based focal points will undergo training on GRM procedures, inclusive engagement, and SEA/SH-safe response protocols. Awareness activities will be synchronized with the Stakeholder Engagement Plan (SEP) and updated periodically to reflect community feedback.

9.4 Monitoring and Reporting

9.4.1 Project Level Reporting and Monitoring

The PMT will maintain a centralized digital grievance database, managed by the GRM Coordinator, to ensure consistent documentation, tracking, and resolution of all grievances. The database will include: submission date, complainant type (anonymous, individual, group), issue category, location, handling steps, outcome, and resolution timeline.

Quarterly and annual progress reports will include GRM indicators such as:

- Number of grievances received (by source and type);
- Number resolved, pending, or escalated;
- Average resolution time;
- Satisfaction ratings (when available);
- SEA/SH-related complaints (reported only in anonymized, aggregate form);
- Trends, systemic issues, and recommendations for procedural improvements.

These reports will feed into the broader Monitoring and Evaluation (M&E) system and will be reviewed by the World Bank as part of its oversight responsibilities.

9.4.2 Reporting to World Bank

The PMT will report GRM activities to the World Bank through standard progress reports and during supervision missions. A concise log will summarize:

- Number of grievances received;
- Resolved, pending, or escalated cases;
- Cases related to SEA/SH (presented only in aggregate form);
- Any systemic issues requiring World Bank support.

Any grievance deemed high-risk—particularly those related to SEA/SH, elite capture, discrimination, or corruption—will be reported immediately to the World Bank under the ESIRT (Environmental and Social Incident Response Toolkit) protocol. If required, the case will also be referred to the Bank's Grievance Redress Service (GRS).

9.4.3 GRM Contact Information

Until the PMT is fully staffed and operational, the following contact will serve as the primary grievance entry point:

Name of the Project	Climate Resilient Fisheries and Agrifood Sector Development (CRFASD) Project
Project Implementing Agency	Ministry of Agriculture, Forestry and Water Management (MAFWM), Montenegro
Address	Rimski trg br. 46 81000 Podgorica
Email	marija.klikovac@t-com.me, Monitoring and Evaluation Specialist
Website	https://www.gov.me/mpsv
Telephone	+382 20 482 262 +382 20 482 278

This information will be updated and re-published upon PMT launch, with full details of the designated GRM Coordinator, municipal focal points, and SEA/SH confidential channels.

10. Monitoring and Reporting

10.1 Involvement of Stakeholders in Monitoring Activities

The monitoring of the Stakeholder Engagement Plan (SEP) is a core requirement under ESS10 to ensure accountability, transparency, and inclusive implementation of the CRFASD Project. Stakeholders will be actively involved in monitoring the effectiveness of engagement activities, the responsiveness of the Project Management Team (PMT), and the resolution of grievances. Monitoring will cover both qualitative and quantitative indicators, with a focus on ensuring meaningful stakeholder participation and responsiveness to feedback, especially from vulnerable or disadvantaged groups.

Monitoring will be conducted by the PMT's Monitoring and Evaluation (M&E) Officer, with support from the Social Development Specialist, and in collaboration with municipal focal points. Results will be shared quarterly and annually with the World Bank and disclosed publicly.

Monitoring Tools and Methods:

- Stakeholder meeting records and consultation logs
- GRM database and grievance logs
- Attendance sheets (disaggregated by gender, vulnerability, stakeholder type)
- Feedback and satisfaction surveys
- Community scorecards and media monitoring

Qualitative Indicators:

- Nature and outcomes of consultations, including themes and emerging concerns
- Levels of stakeholder satisfaction and responsiveness to feedback
- Evidence of adaptive changes in project design or mitigation measures based on stakeholder input

Quantitative Indicators:

- Number and types of engagement events held, disaggregated by stakeholder group and location
- Number of grievances received, resolved, and pending (including disaggregation by gender, type, and location)
- Number of SEA/SH-related grievances reported and referred appropriately
- Participation rates of vulnerable and disadvantaged groups
- Timeliness of reporting back to stakeholders and updates on disclosed documents

Gender-Responsive Monitoring and Disaggregated Indicators
To ensure equitable stakeholder engagement and benefit-sharing, the CRFASD Project will track

gender-disaggregated indicators throughout the implementation of the Monitoring data will include the number and percentage of women and men:

- Participating in public consultations and information sessions;
- Accessing the Grievance Redress Mechanism (GRM);
- Expressing project-related concerns or feedback;
- Benefiting from project-related livelihood or capacity-building activities.

This disaggregated data will be used to assess the project's gender responsiveness and to identify any emerging barriers to women's participation. If disparities are identified, corrective actions will be taken, including targeted outreach, adjusted communication tools, or gender-specific engagement activities. The PMT's Gender Focal Point will oversee the integration of gender indicators into regular SEP monitoring and reporting frameworks

SEP monitoring will be linked to ESS10-related commitments defined in the Environmental and Social Commitment Plan (ESCP), and progress will be reflected in regular project implementation reports to the World Bank.

10.2 Reporting Back to Stakeholder Groups

To ensure transparency and reinforce stakeholder trust, the CRFASD Project will establish mechanisms for systematic and accessible feedback to all stakeholder groups. Reporting back will be conducted on a quarterly basis and in formats appropriate for different audiences.

Feedback Mechanisms Include:

- Community feedback meetings organized by the PMT in Ulcinj, Bar, and Nikšić
- Printed bulletins and noticeboards in municipal buildings and community centers
- Updates on the MAFWM and PMT project websites and social media channels (Facebook, WhatsApp, Viber)
- Periodic newsletters shared through local agriculture/fisheries cooperatives
- Anonymized summaries of resolved grievances shared with communities
- Targeted outreach sessions for women, Roma and Egyptian communities, and youth organizations

All information will be disclosed in Montenegrin, with translation into Albanian or Romani for relevant vulnerable groups, ensuring full accessibility and cultural appropriateness.

10.3 Reporting to the World Bank

The PMT will produce bi-annual monitoring reports for submission to the World Bank, including a dedicated chapter on the implementation of the SEP and Grievance Redress Mechanism (GRM). These reports will:

- Track SEP implementation indicators as defined in the Results Framework (PAD)
- Include cumulative engagement and grievance statistics

- Document stakeholder concerns and how they have informed decision-making
- Highlight progress on addressing inclusion, SEA/SH risks, and GRM functioning

The SEP will be updated periodically based on monitoring results, stakeholder input, or changes in project scope.

Table 11.1: SEP Monitoring and Evaluation Framework

Evaluation Area	Key Questions	Indicators	Data Sources/Tools
Grievance Mechanism Functionality	<ul style="list-style-type: none"> - Are stakeholders using the GRM? - Are grievances resolved effectively and on time? - Are SEA/SH referrals functioning? 	<ul style="list-style-type: none"> - Number of grievances received and resolved - Resolution rate (within 30 days) - SEA/SH cases referred for support services 	<ul style="list-style-type: none"> GRM database Focal point reports Community scorecards
Effectiveness of Stakeholder Engagement	<ul style="list-style-type: none"> - Are stakeholder views influencing project design? - Is participation inclusive and equitable? 	<ul style="list-style-type: none"> - Number of consultations held - Feedback incorporated into ESIA/ESMP/SEP updates - Number of engagement sessions targeting vulnerable groups 	<ul style="list-style-type: none"> Attendance records Consultation summaries Feedback surveys
Stakeholder Satisfaction	<ul style="list-style-type: none"> - Are stakeholders satisfied with the level of engagement? - Are their expectations met? 	<ul style="list-style-type: none"> - Satisfaction ratings from surveys - Positive feedback trends - Number of suggestions adopted 	<ul style="list-style-type: none"> Satisfaction survey results Feedback forms
Implementation of SEP Commitments	<ul style="list-style-type: none"> - Are SEP activities on schedule and as planned? - Are resources allocated effectively? 	<ul style="list-style-type: none"> - % of planned SEP activities completed - Budget execution rate for stakeholder engagement 	<ul style="list-style-type: none"> SEP activity log Financial reports M&E updates
Transparency and Accessibility	<ul style="list-style-type: none"> - Is project information disclosed in a timely and accessible manner? - Are marginalized groups being reached? 	<ul style="list-style-type: none"> - Timely publication of key documents - Disaggregated outreach data - Use of local languages/formats 	<ul style="list-style-type: none"> Website traffic Media monitoring Outreach tracking tools

Annexes

- Annex 1. Template to capture minutes/records of consultation meetings
- Annex 2. Sample Table: Monitoring and Reporting on the SEP
- Annex 3. Annex 3: Summary of SEA/SH Grievance Handling Protocols

Annex 1: Template to Capture Consultation Minutes

Stakeholder (Group or Individual)	Summary of Feedback	Response of Project Implementation Team (PMT/MAFWM)	Follow-up Action / Next Steps
(e.g., Local fishers in Ulcinj)	Concerned about temporary loss of access to landing site during construction	PMT explained that construction works will be phased and temporary access points will be provided	Site-specific construction and access plan to be shared and discussed at the next local coordination meeting
(e.g., Women-led processing enterprise)	Requested support for accessing technical assistance and storage facilities	PMT confirmed training and advisory support through Component 1 activities	Schedule targeted information session in Ulcinj on available technical assistance programs in Q2 2025
(e.g., Directorate for Fisheries staff)	Need for tailored training on new EU-aligned inspection procedures	Project team acknowledged and noted training is planned under Subcomponent 1.2	Coordinate with training provider and develop training calendar by June 2025
(e.g., Community in Nikšić)	Concerns regarding odor and traffic impact of the ABP facility	PMT explained design includes odor control systems and restricted traffic hours	Share environmental mitigation plan during next municipal briefing

Annex 2. Monitoring and Reporting on the SEP

Key evaluation questions	Specific Evaluation questions	Potential Indicators	Data Collection Methods
GM. To what extent have project-affected parties been provided with accessible and inclusive means to raise	<ul style="list-style-type: none"> Are project-affected parties raising issues and grievances? How quickly/effectively are the grievances resolved? 	<ul style="list-style-type: none"> Usage of GM and/or feedback mechanisms Requests for information from relevant agencies. Use of suggestion boxes placed in the 	Records from the implementing agency and other relevant agencies

<p>issues and grievances? Has the implementing agency responded to and managed such grievances?</p>		<p>villages/project communities.</p> <ul style="list-style-type: none"> • Number of grievances raised by workers, disaggregated by gender of workers and worksite, resolved within a specified time frame. • Number of Sexual Exploitation, and Abuse/Sexual Harassment (SEA/SH) cases reported in the project areas, which were referred for health, social, legal and security support according to the referral process in place. (if applicable) • Number of grievances that have been (i) opened, (ii) opened for more than 30 days, (iii) resolved, (iv) closed, and (v) number of responses that satisfied the complainants, during the reporting period disaggregated by category of grievance, gender, age, and location of complainant. 	
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<p>Stakeholder engagement impact on project design and implementation. How have engagement activities made a difference in project design and implementation?</p>	<ul style="list-style-type: none"> • Was there interest and support for the project? • Were there any adjustments made during project design and implementation based on the feedback received? • Was priority information disclosed to relevant parties throughout the project cycle? 	<ul style="list-style-type: none"> • Active participation of stakeholders in activities • Number of actions taken in a timely manner in response to feedback received during consultation sessions with project affected parties. • Number of consultation meetings and public discussions where the feedback and recommendation received is reflected in project design and implementation. • Number of disaggregated engagement sessions held, focused on at-risk groups in the project. 	<p>Stakeholder Consultation Attendance Sheets/Minutes</p> <p>Evaluation forms</p> <p>Structured surveys</p> <p>Social media/traditional media entries on the project results</p>
<p>Implementation effectiveness. Were stakeholder engagement activities effective in implementation?</p>	<ul style="list-style-type: none"> • Were the activities implemented as planned? Why or why not? • Was the stakeholder engagement approach inclusive of disaggregated groups? Why or why not? 	<ul style="list-style-type: none"> • Percentage of SEP activities implemented. • Key barriers to participation identified with stakeholder representatives. • Number of adjustments made in the stakeholder engagement approach to improve projects' outreach, inclusion and effectiveness. 	<p>Communication Strategy (Consultation Schedule)</p> <p>Periodic Focus Group Discussions</p> <p>Face-to-face meetings and/or Focus Group discussions with Vulnerable Groups or their representatives</p>

Annex 3: Summary of SEA/SH Grievance Handling Protocols⁴

(Fulfilling World Bank Good Practice Note, 2020)

To address the specific risks of Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), the CRFASD Project will implement dedicated grievance handling protocols that adhere to the World Bank's **Good Practice Note: Addressing SEA/SH in Investment Project Financing (2020)**. These protocols ensure a **survivor-centered, confidential, and accessible** process for reporting and responding to SEA/SH grievances. The following principles will be integrated into the Grievance Redress Mechanism (GRM):

1. Confidentiality and Privacy Protection

SEA/SH-related complaints will be treated with the strictest confidentiality. GRM staff will be trained to respect survivors' privacy, and no personal data will be disclosed without informed consent. Records will be kept separately from other project-related grievances to ensure data protection.

2. Anonymous and Safe Reporting Channels

Survivors may choose to submit grievances anonymously. In such cases, the GRM will still ensure appropriate follow-up while respecting the survivor's right not to disclose identity or details. Reporting mechanisms will include low-tech, accessible options (e.g., sealed complaint boxes, in-person reporting through trained focal points) to accommodate women, girls, and vulnerable populations with limited digital access.

3. Separate and Specialized Handling

SEA/SH grievances will be handled through a separate channel within the GRM and managed only by **trained personnel**. These focal points will be knowledgeable in SEA/SH protocols and gender-based violence response, including principles of do-no-harm, safety, and survivor empowerment.

4. No Retaliation or Penalties

No complainant or survivor will face retaliation or discrimination for reporting SEA/SH. The project explicitly prohibits any punitive measures or adverse treatment toward those who raise SEA/SH-related concerns.

5. No Burden of Proof on Survivors

⁴ <https://documents.worldbank.org/en/publication/documents-reports/documentdetail/399881582493078997>

The GRM will not require survivors to provide evidence or detailed accounts of incidents. The guiding approach is survivor-first, aiming to support the individual rather than to investigate or substantiate claims.

6. Referral to Support Services

Upon receiving an SEA/SH complaint, the GRM will immediately refer the survivor to local service providers for medical, psychosocial, legal, and protection support. A directory of qualified service providers will be maintained and updated regularly. Where service provision is limited, the project will explore coordination with national or municipal authorities to ensure support access.

7. Monitoring and Reporting

SEA/SH grievances will be reported separately from general GRM complaints and disclosed in aggregated form (no personal identifiers) in monitoring reports to ensure transparency and accountability. Internal review mechanisms will ensure that SEA/SH grievances are acted upon sensitively and promptly.

8. Capacity Building and Focal Points

The PMT will be reinforced with a Social Development Specialist, who will also serve as the SEA/SH Focal Point, responsible for overseeing SEA/SH risk management, including grievance handling, training of GRM personnel, and coordination with relevant service providers. All contractors will be required to adopt and enforce Codes of Conduct that specifically address SEA/SH risks.