

FIRST DRAFT

STAKEHOLDER ENGAGEMENT PLAN SOLAR POWER PLANT RUDINE 50MW, NIKSIC

Prepared by:

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1. Introduction and Project Description

1.1. Purpose of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) has been prepared for the Rudine Solar Photovoltaic Project (hereinafter referred to as “the Project”) to outline a structured and appropriate approach to stakeholder engagement throughout the entire project lifecycle. The SEP ensures compliance with Montenegrin national legislation, the requirements of the European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2024), in particular Performance Requirement (PR) 10: Information Disclosure and Stakeholder Engagement, and other applicable EBRD Performance Requirements.

The SEP aims to:

- Ensure that stakeholders are informed and meaningfully engaged at all stages of the Project;
- Promote transparent, inclusive, timely and continuous engagement;
- Establish effective channels for communication between the Project and stakeholders;
- Set out procedures for receiving, responding to, and resolving stakeholder grievances through a formal Grievance Redress Mechanism (GRM);
- Support the preparation of the Land Acquisition and Resettlement Framework (LARF) during the ESIA stage, and subsequently a LARP, once the main design and expropriation studies are available.

The SEP is a living document that will be updated and refined as the Project advances from planning and permitting, through construction and operation, to eventual decommissioning.

The following table summarises the phases of stakeholder engagement and progress to date.

Table 1-1: Phases of the SEP and Progress to Date

Phase	Description	Status
Phase 1: ESIA Scoping	Initial stakeholder engagement during the scoping stage of the ESIA, including identification and mapping of stakeholders, preparation of the SEP, preliminary information disclosure, and planning of engagement activities for the ESIA.	In progress
Phase 2: ESIA Finalisation and Disclosure	Engagement activities during the finalisation of the ESIA, including public disclosure of the ESIA documentation, public hearings in line with national legislation and EBRD PR10, collection and integration of stakeholder feedback, and disclosure of final ESIA outcomes.	Planned
Phase 3: On-going Engagement	Continuous stakeholder engagement throughout construction, operation and decommissioning, including regular updates, grievance management, and targeted consultations on specific project activities (e.g. grid connection works, maintenance).	Planned

The engagement process is structured to ensure meaningful and timely consultations with all relevant stakeholders, including local communities, project-affected persons, competent institutions, NGOs, and other interested parties.

1.2. Project Overview

The Rudine Solar Photovoltaic Plant is planned in KO Rudine, within the Municipality of Nikšić, Montenegro. The Project involves the development of a ground-mounted solar PV plant with an installed capacity of approximately 49,875 MWp, covering a footprint of around 74.8 ha.

The Project also includes grid connection infrastructure consisting of:

1. Reconstruction of approximately 10 km of the existing 110 kV Nikšić–Bileća overhead transmission line, owned and operated by CGES (Crnogorski elektroprenosni sistem). This reconstruction is planned in the Transmission Network Development Plan 2025–2032.
2. Construction of two new 110 kV OHL segments of approximately 500 m each:
 - ✓ One connecting the PV plant to the existing 110 kV Nikšić–Bileća line;
 - ✓ The other connecting the same line to SS Vilusi substation.

The exact technical design of the connection is currently under preparation and will be defined in the Main Design.

Associated facilities include internal roads, a substation, temporary construction areas (laydown and yards), and access infrastructure.

The location of the above-mentioned project components is shown below.

The objectives of the Rudine Project are:

- To generate green electricity in Montenegro, thus contributing to the national strategy for the increase of RES and the reduction of GHG emissions
- To contribute to strengthening the regional electricity supply, and thus to regional development
- To contribute to reducing the reliance of the country on imported energy sources and thus promote the reliability of the energy supply.

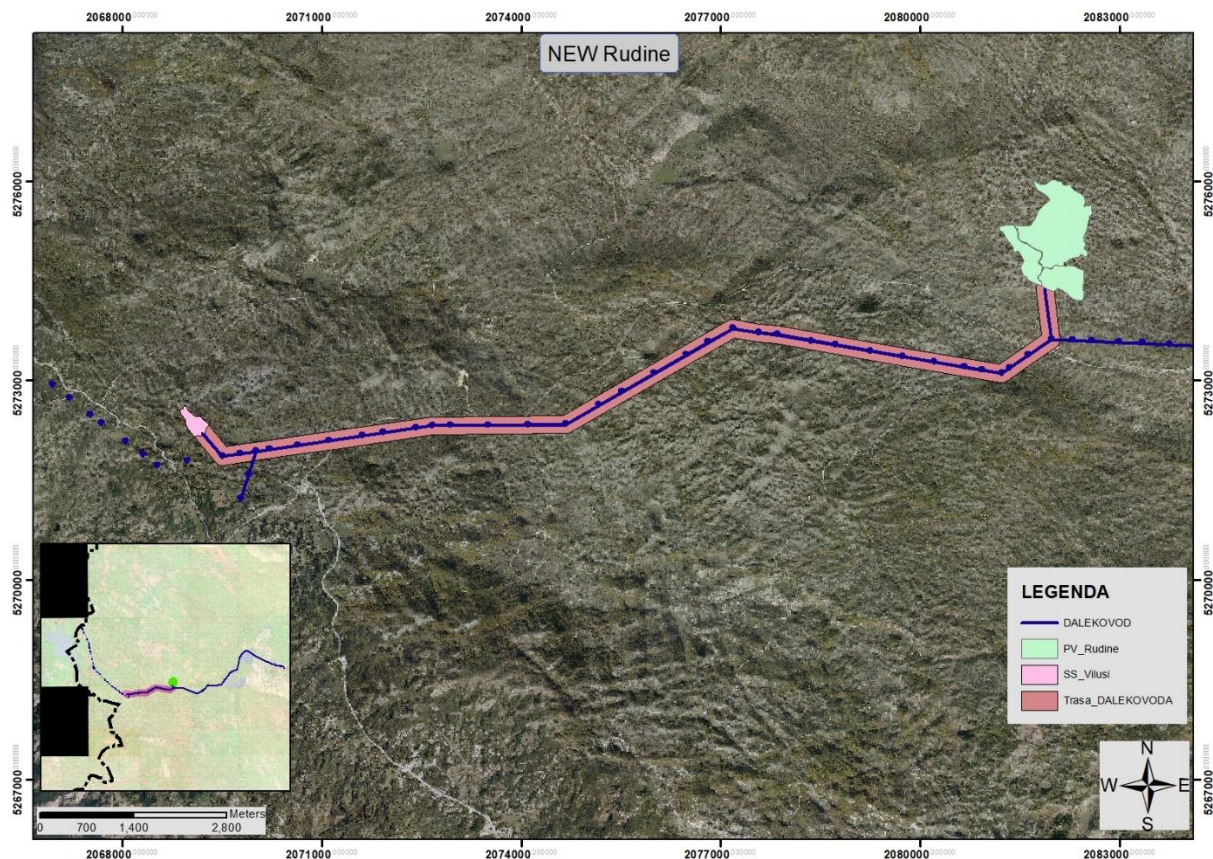


Figure 1-1: Location of the project elements including SPP, OHL and SS

1.3. Structure of this Plan

This Stakeholder Engagement Plan (SEP) is structured as follows:

Section 1: Introduction – Provides an overview of the Project, objectives of the SEP, and its alignment with national legislation and EBRD’s Environmental and Social Policy (2024).

Section 2: National and International Regulations and Best Practice – Summarises the legal and policy framework for stakeholder engagement applicable to Montenegro and relevant international standards (e.g. EBRD PR10, Aarhus Convention).

Section 3: Stakeholder Identification and Analysis – Identifies stakeholders relevant to the Project, including Project-Affected Persons (PAPs), local communities, authorities, NGOs, and other interested parties.

Section 4: ESIA Stakeholder Engagement Plan – Describes the activities undertaken during the Scoping and EIA phases, and outlines the planned engagement for the ESIA disclosure and subsequent phases of Project development.

Section 5: Grievance Mechanism – Details the procedure for receiving, recording, assessing and resolving grievances from affected communities and stakeholders, including anonymous submissions.

Section 6: Monitoring and Reporting – Describes how stakeholder engagement activities will be monitored and reported, including responsibilities and frequency.

Annexes:

- Annex A: Stakeholder Groups
- Annex B: Grievance Reporting Form

Additional annexes may be added during the implementation of the SEP to document stakeholder engagement activities carried out at various Project phases.

2. Regulatory Context

2.1. National Stakeholder Engagement Requirements & Legislation

Several types of public consultations relevant to the Project are foreseen by laws in Montenegro:

- 1) Consultations during the adoption of spatial planning documents – information disclosure and public consultations are mandated by the **Law on Spatial Development and Construction**. Spatial planning processes at all levels must incorporate public participation, providing sufficient time for the submission of comments. Following this, a public consultation report must be published to document the outcomes and feedback received.
- 2) Consultations during the national EIA procedure are required by the Law on the EIA. Projects are classified into two categories: projects that require mandatory preparation and submission of an EIA Study, and projects for which the preparation of an EIA Study depends on the opinion issued by the competent authority (for this Project, the competent authority is the Environmental Protection Agency – EPA).

For the **Rudine Solar PV Project**, the competent authority – the Environmental Protection Agency (EPA) – issued an opinion within the process of obtaining Urban Technical Conditions, establishing the obligation to prepare an Environmental Impact Assessment Study.

This procedure includes a mandatory public hearing on the EIA Study. The public hearing for the Rudine project was held on **20 November 2024 in Nikšić**, while the approval of the EIA Study was issued on **19 December 2024**.

Additionally, the following laws in Montenegro, which include requirements regarding transparency and information disclosure, will apply to the Project:

The Law on Free Access to Information of Public Importance stipulates that public authorities must provide every person with access to and the opportunity to become acquainted with information of public importance, except in cases prescribed by law.

The Media Law states that public information is free and not subject to censorship, and that the public has the right and interest to be informed about matters of public importance.

Montenegro has also ratified the **Aarhus Convention on Access to Information**, Public Participation in Decision-Making, and Access to Justice in Environmental Matters. The Convention applies both to government bodies and to other natural or legal persons who have public functions or responsibilities or provide public services.

There are no other local requirements for stakeholder engagement that are comparable to the EBRD requirements outlined below.

2.2. EBRD Requirements

EBRD recognizes the importance of stakeholder engagement as an essential element of good international practice and corporate citizenship. Such engagement is also a way of improving the environmental and social sustainability of projects. Effective community engagement is essential for the successful management of a project's environmental and social risks and impacts. Stakeholder engagement is central to achieving enhanced community benefits from a project.

The preparation of this SEP has taken into account the provision of EBRD's Environmental and Social Policy (2024) and Access to Information Policy and Directive (2024)¹.

The following elements of EBRD PR 10 will be applicable for the Stakeholder Engagement of the Project in addition to the national requirements:

1. **Stakeholder identification and analysis.** The first step in successful stakeholder engagement is the identification of various individuals and groups who (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties), or (ii) may have an interest in the Project (other interested parties), with specific attention to individuals and groups disadvantaged or with vulnerable status.
2. **Stakeholder Engagement Plan.** The Consultant will develop a Stakeholder Engagement Plan that will outline how communication with identified stakeholders will be handled throughout project preparation and implementation, including the grievance procedure envisaged.
3. **Disclosure and consultation.** Category B projects (including this Project) require carrying out a comprehensive assessment of environmental and social impacts (ESIA).

¹ The 2024 Access to Information Policy and Directive on Access to Information were approved by the EBRD Board of Directors on 22 October 2024 and by the EBRD President, respectively. They came into effect on 1 January 2025.

Disclosure and consultation requirements must be built into each stage of the ESIA process.

4. **Information disclosure.** Disclosure of relevant project information helps stakeholders better understand the risks, impacts, and opportunities associated with the Project.
5. **Meaningful consultation.** The consultation process with affected parties will be undertaken in a manner that is inclusive and culturally appropriate, and which represents the views and specific needs of various groups. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts, and opportunities evolves.
6. **Ongoing reporting to relevant stakeholders.** Providing information to identified stakeholders, on an ongoing basis, appropriate to the nature of the Project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the Project.
7. **Grievance mechanism.** Establishment of an effective grievance mechanism to receive and facilitate the resolution of stakeholders' concerns and grievances, in particular, about the environmental and social performance of the project.

EBRD's Access to Information Policy and Directive sets out the EBRD's commitment to transparency and disclosure based on the principles of Transparency, Accountability, Good Governance and Client Responsibility to Affected Stakeholders, describes the principles of implementation arrangements as well as contains a limited list of exceptions to disclosure and corresponding overrides. The project documentation will be disclosed to the public on the EBRD website in accordance with this Policy.

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organizations about EBRD-financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

2.3. UN Economic Commission for Europe (UNECE) Aarhus Convention

Public participation in decision-making is fundamental in the Aarhus Convention. The term public participation is not explicitly defined, but involves the activity of members of the public working in partnership with public authorities to reach an optimal result in decision-making and policy-making. A minimum requirement of this is to ensure effective notice, supply of adequate information, proper procedures, and appropriate consideration of the outcome of public participation. The level of involvement of the public in a particular process depends on a number of factors, including the expected outcome, its scope, who and how many will be

affected, whether the result settles matters on a national, regional or local level, and so on. The Convention states that public participation should be timely, effective, adequate and formal, and contain information, notification, dialogue, consideration and response.

Montenegro ratified the Aarhus Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters and it links environmental and human rights and resides on the belief that it is a basic right of present and future generations to live in an environment adequate to health and wellbeing. The convention focuses on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice. Other stakeholder engagement, disclosure and transparency requirements within certain topics and sectors are embedded in the applicable laws regulating each of the treated subjects.

2.4. Key Differences between Montenegrin and EBRD Requirements for Stakeholder Engagement

The following gaps between Montenegrin legal requirements and the EBRD requirements (ESP 2024 and PR10) for stakeholder engagement have been identified:

Stakeholder Engagement Plan (SEP):

Montenegrin legislation does not require the preparation of a formal SEP. EBRD, however, requires the development and implementation of a SEP that systematically plans and documents engagement activities throughout the entire project lifecycle, including disclosure, consultation, grievance management, monitoring, and reporting.

Proactive vs. Reactive Engagement:

National procedures are largely reactive, focusing on public disclosure and the collection of comments during legally prescribed public consultations (e.g., EIA public hearings). In contrast, EBRD requires a proactive and iterative approach to stakeholder engagement, starting early in project preparation and continuing throughout construction and operation.

Engagement with Vulnerable Groups:

Montenegrin legislation does not include explicit requirements to identify or engage with vulnerable groups. EBRD PR10 requires the identification of vulnerable and disadvantaged groups (e.g., elderly, people with disabilities, ethnic minorities, isolated rural households) and ensuring that their views are considered through tailored engagement approaches.

Grievance Mechanism:

Montenegrin legislation provides administrative and judicial procedures for grievances but does not require a project-level grievance mechanism. EBRD requires the establishment and operation of a dedicated, accessible, transparent, and inclusive grievance mechanism at the project level for all stakeholders, including vulnerable groups.

Duration of Engagement:

National legislation focuses on stakeholder engagement during specific permitting stages (e.g., spatial planning and EIA procedures). EBRD PR10 requires on-going stakeholder engagement for the entire duration of the project, including construction, operation, and decommissioning phases.

Transparency and Disclosure:

While Montenegrin legislation provides for access to information mainly through formal channels and public hearings, EBRD AIP (2024) requires timely, meaningful, and broad disclosure of information in formats and languages accessible to all affected stakeholders.

3. Stakeholder Identification and Analysis

3.1. Stakeholder Identification

For the purposes of this Plan stakeholders are individuals or groups that are affected or likely to be affected (both directly and indirectly) by the Project (“affected parties”) or that may have an interest in the Project (“other interested parties”).

The objective of stakeholder identification is therefore to establish which organizations and individuals may be directly or indirectly affected (positively and negatively) by the Project. The process also aims to identify which stakeholder may have an interest and/or a positive or negative impact or influence on the Project.

In the case of the proposed project, potential stakeholders fall in one of the following categories:

No.	Stakeholder Group	Definition of Stakeholders
1	Project Affected People	Individuals, households, and businesses - owners or users of land - who will be affected by permanent or temporary land acquisition and/or land use changes related to the construction and operation of the PV plant and associated facilities, including the 110 kV transmission line connection.
2	Local Residents and Businesses in the Project Area including Local communities Vilusi and Rudine	Local communities, residents and businesses located in the proximity of the PV plant site and along the section of the 110 kV OHL to be reconstructed, who may be affected by access restrictions, noise, dust, or other disturbances during construction works.
3	Users of Access Roads	Population using local and regional access roads that will be used for the transport of construction materials, equipment and workforce, and who may be directly or indirectly affected by increased traffic, temporary road closures or delays during construction.
4	Affected Vulnerable Groups	People who, by virtue of gender identity, sexual orientation, religion, ethnicity, age, disability, economic disadvantage, or social status, may be more adversely affected by Project impacts

		than others and/or may have limited ability to claim or benefit from project opportunities. This may include elderly rural residents, low-income households, and people with reduced mobility in the Rudine area.
5	Government Authorities within the Project Area, Relevant Ministries and Public Institutions	Municipal and national institutions directly involved in Project implementation (e.g. Municipality of Nikšić, Local Community Vilusi and Rudine, Ministry of Spatial Planning, Urbanism and State Property, Ministry of Energy and Mining, Environmental Protection Agency, Transmission System Operator – CGES, Cadastre and Property Administration) as well as other authorities with regulatory, planning or permitting responsibilities.
6	Interested NGOs at Local and National Level	Environmental NGOs, professional associations, local civic initiatives, and other civil society organizations at the local or national level with an interest in the project (e.g. biodiversity protection, renewable energy development, spatial planning) and/or the ability to influence public opinion and decision-making.
7	Employees and Workers	Individuals and organizations directly or indirectly engaged in project planning, construction and operation, including the developer (Qair), contractors, subcontractors, consultants, and site personnel, whose active involvement is essential for project success and compliance with environmental and social standards.
8	Media / Press	Local, regional and national media outlets (TV, radio, print and online platforms) that play a key role in disseminating project information, announcements of public hearings, and communicating project impacts and benefits to the wider public.

Stakeholder identification and mapping were initiated during the planning phase of the Project and will be regularly reviewed and updated throughout the lifetime of the Project. This analysis allows for informed planning of stakeholder activities and helps identify the key objectives of engagement with different parties.

3.2. Stakeholder Analysis

In order to develop an effective SEP, it is necessary to understand the priorities and objectives of stakeholders in relation to the Project. The stakeholder analysis tool in Figure 3.1 was used to group them.

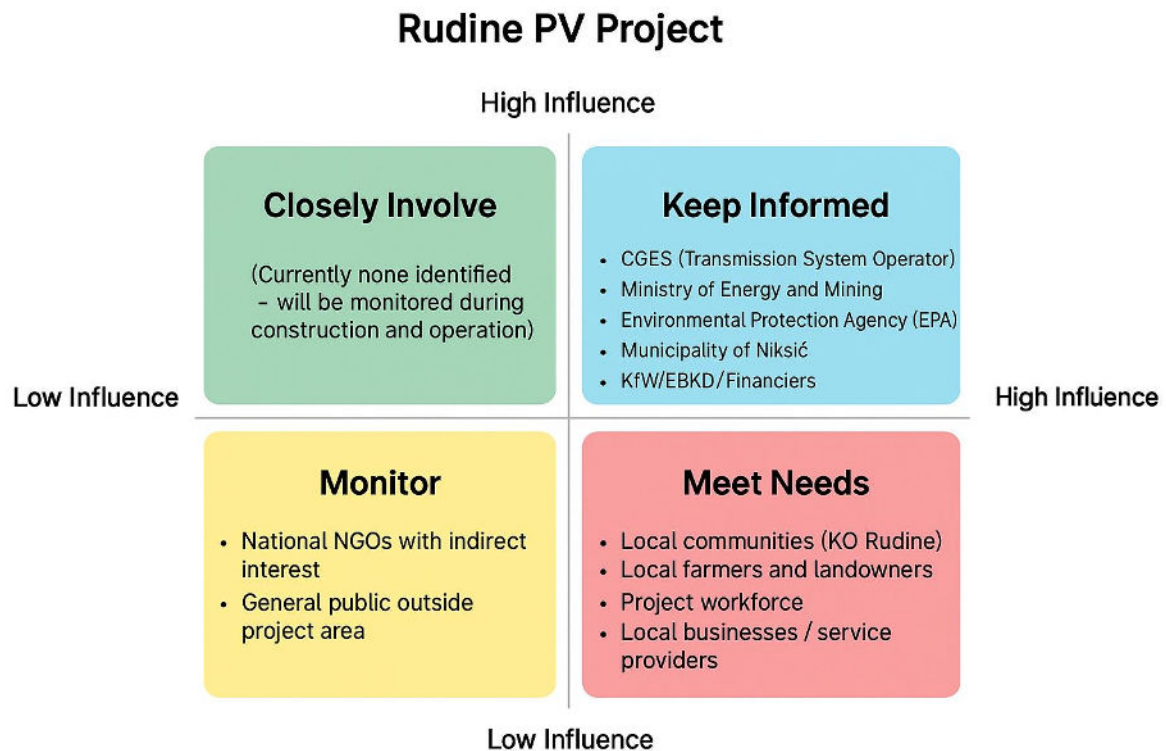


Figure 3-1: Stakeholder mapping tool

The stakeholder mapping guides the degree of effort required in working with each stakeholder on an on- going basis. After prioritizing stakeholders, the information is used to determine the degree to which Qair Rudine d.o.o. interacts with each stakeholder.

3.3. Communication Methods

A variety of communication methods were identified during the SEP preparation to be used as appropriate for each group of stakeholders. The following are anticipated to be used for the public consultations and disclosure of information as part of the ESIA process for the proposed Project:

- Press releases and announcements for the media
- Publications such as ESIA Scoping Report, Draft ESIA, Final ESIA, Non-technical summary, SEP etc.
- Public Presentations of the main project features, impacts and mitigation measures
- Interviews with key informants (i.e. heads of communities, other knowledgeable people at the local level)
- Focus group discussions, i.e. with women, youth, hunters and farmers
- Open hearings, at the municipality and community level
- Publication of relevant project information on Qair Rudine d.o.o. website.

Table 3-1: Overview of SEP Communication Tools

Communication tool	Description
Press release / announcements for media	This communication method includes new facts and information about the project. Press releases / announcements provide a response to the so-called 5W questions (who, what, where, when, why (and how)). This method is simple, but not always effective because it depends on the filtering of information in the media.
Interviews	The advantage of this method is that it can be prepared for specific target groups. Important to identify in advance the target group and plan what needs to be said and to whom.
Internet / web page	It can be very effective if it is used regularly and in a timely manner. It enables constant access to information and research, depending on the interests of specific target groups.
Presentations	The purpose of the presentation is to introduce the project and the results of work.
Public debate	This method is based on the use of presentations and interviews. The method is intended for the general public and assumes public participation in the debate. The method is useful for collecting information and opinions of the public and allows two-way communication.
Roundtable discussions (i.e. focus group discussions)	This method uses presentations and interviews but is intended for target groups (mainly professional audience) and for a smaller number of participants. The method is useful for collecting information and opinions of the target group and allows two-way communication.
Direct dialogue (open hearings)	The method of direct dialogue is desirable to establish a direct two-way communication with the target group. Allows a fast and successful exchange of information and is an efficient method for collecting opinions of the target group.

The methods/tools described above, as well as their advantages and disadvantages related to the de-fined objective, were taken into account in preparing the SEP.

4. Stakeholder Engagement plan

4.1. Methodology

The following elements were considered in the preparation of this SEP:

- **Geographic context:** The locations of the project components and the distances between these and the neighbouring communities will determine to a large extent the number of meetings and methodologies proposed.
- **Stage of the project:** The scope of consultation and disclosure activities is defined according to the needs of each stage of the Project.
- **Level of activity on the ground:** It is recognised that there will be a number of specialists undertaking activities in the local areas throughout the different project

phases. It is necessary to ensure that the relevant authorities are aware and supportive of these activities.

- **Range of stakeholder groups:** As previously discussed, engagement needs to be tailored to the needs and interests of different stakeholder groups taking account of language preferences, decision making processes and the needs of any disadvantaged or vulnerable groups.
- **Compliance with relevant standards:** The scope of the engagement to be proposed at each stage of the project will ensure compliance with Montenegrin requirements and EBRD ES Policy.

4.2. Phases of Engagement Activities

For the purposes of this project, the Stakeholder Engagement Plan has been divided into three phases, each having slightly different objectives for consultation. These phases are:

- Phase 1: ESIA Scoping. The scoping phase will contact statutory stakeholders at national, regional and local level. The aim of this phase is to provide information on the Project and generate feedback on the scope, approach, key issues and key stakeholders to be consulted. This phase will also enable the project team to gather additional baseline data.
- Phase 2: ESIA Finalisation and Disclosure. Stakeholders will be presented with the draft ESIA report at the end of the ESIA preparation process. Information on the project impacts will be presented along with the mitigation measures designed to minimise or, where positive, to enhance them. Comments of stakeholders will be taken into account in preparing the final ESIA.
- Phase 3: Ongoing Engagement. Qair Rudine doo will continue to engage with stakeholders throughout the project lifecycle. The methodology for this will be developed and finalised using the information compiled during the ESIA process.
- Detailed information on the engagement methodology, stakeholder engagement plan and stakeholders to be engaged during each project phase will be provided as Annexes to this SEP as the project is evolving.

As part of Phase 3, Qair Rudine d.o.o. will continue to engage with stakeholders throughout the entire project lifecycle, following the methodology defined in this SEP.

During the pre-construction and construction phase, regular engagement will be maintained with key stakeholders, particularly with the local communities of Rudine and Vilusi, as well as landowners along the access roads and connection corridor. Regular meetings will be organized to inform stakeholders about the progress of works, active construction fronts, as well as potential temporary impacts that may occur (e.g. dust and noise during excavation, traffic disruptions due to transport of heavy equipment, or other construction nuisances).

The Grievance Redress Mechanism (GRM) will be regularly discussed during these meetings to ensure that community members understand how to use it and to encourage its use whenever needed. Potential complaints or grievances will also be addressed during these

sessions. Representatives of Qair Rudine d.o.o. will actively participate in these meetings to maintain good relations with the communities and to ensure that any issues are resolved amicably, avoiding escalation or negative reputational impacts.

In addition to regular meetings, ad-hoc consultations may be organized to address any significant issues that arise during construction, including grievances or incidents related to gender-based violence (GBV), sexual exploitation and abuse / sexual harassment (SEA/SH), or increased community health and safety risks. Qair Rudine d.o.o. will closely monitor the handling and resolution of such cases to ensure effective and sensitive management.

During the operation phase, Qair Rudine d.o.o. will maintain regular communication with neighbouring communities, local authorities, and other stakeholders to ensure a transparent and constructive relationship throughout the operational period. The goal is to build and maintain trust and establish a solid framework for resolving any operational issues that may arise.

During the decommissioning phase, the company will continue its engagement activities, informing stakeholders about planned activities, potential impacts, and measures to ensure environmental and social protection during the dismantling and rehabilitation works.

Detailed information on the engagement methodology, stakeholder engagement activities, and specific stakeholders for each project phase will be further elaborated in the Annexes of this SEP as the project evolves.

4.3. Planned Information Disclosure and Public Consultation

Table 4.1 below summarizes how/when/where stakeholders will be consulted throughout the different ESIA process stages and how their concerns and comments will be considered and reported back.

Table 4-1: Consultation during ESIA Stages

ESIA Stage	Stakeholders	Engagement Activities	Timing / Frequency	Purpose of Consultation
Scoping	- National and local authorities (EPA, Municipality Nikšić, relevant Ministries) - Local communities (Rudine, Vilusi) - Landowners along access roads and connection corridor - NGOs and civil society - General public	- Disclosure of the Scoping Report on official websites - Distribution of project information leaflets - Initial community meetings - Collection of baseline inputs from stakeholders	During Scoping phase (completed / ongoing)	- Inform stakeholders about the project and ESIA scope - Identify key environmental and social issues - Collect baseline information and local knowledge

ESIA Draft & EIA procedure (National)	• Environmental Protection Agency (EPA) • Local communities and PAPs • General public • NGOs	• Public disclosure of the EIA/ESIA draft • Public hearing held in Nikšić on 20 November 2024 • Collection of written and verbal comments • Consideration of comments in final EIA/ESIA	November – December 2024	• Inform the public and stakeholders about the project and its potential impacts • Receive feedback and integrate relevant comments into the final ESIA
ESIA Finalisation & Disclosure (EBRD)	• Project Affected People (PAPs) • Local communities (Rudine, Vilusi) • Landowners • Municipal and national authorities • NGOs • Media	• Public disclosure of the Final ESIA and Non-Technical Summary (NTS) in Montenegrin and English • Public announcements through media and municipal notice boards • Community meetings and focus groups • Website publication	Planned (2025)	• Ensure transparent disclosure of final ESIA findings and mitigation measures • Provide opportunities for final feedback prior to financial close
Construction	• Local communities and landowners • Local businesses • Municipal authorities • Contractors and workers	• Regular community meetings (monthly) • Ad-hoc consultations on specific issues • Grievance Redress Mechanism (GRM) operational • Construction progress updates	Throughout construction	Inform communities of construction activities, schedule, and potential temporary impacts Address grievances and prevent escalation
Operation & Decommissioning	• Local communities • Municipal authorities • NGOs • Landowners	• Regular information sharing	Throughout operation and prior to decommissioning	• Maintain trust and transparent communication during operation • Prepare

		• Periodic engagement meetings • GRM maintained • Information on decommissioning plans disclosed well in advance		communities for decommissioning activities
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4.4. Review of Stakeholder's Engagement to Date

4.4.1. Prior to the Project

Prior to the initiation of the ESIA process, several engagement activities took place in the context of spatial planning and permitting procedures in line with national legislation, as well as preliminary engagement with local communities during the preparation of the EIA. Although these activities were not initiated within the ESIA framework, they represent an essential baseline for future stakeholder engagement and provide valuable insight into early community attitudes toward the Project.

As part of the spatial planning process, public consultations were organised during the preparation and adoption of relevant planning documents for the wider area, including the Detailed Spatial Plan and associated planning documentation. Public disclosure and consultations were carried out in accordance with the Law on Spatial Development, enabling affected stakeholders and the general public to submit comments and participate in the decision-making process. No objections related to the Rudine Solar Power Plant were recorded during these consultations.

In parallel, the Environmental Protection Agency (EPA), as the competent authority, issued an opinion during the Urban-Technical Conditions procedure requiring the preparation of an Environmental Impact Assessment (EIA) Study for the Project. This triggered the formal EIA procedure in accordance with the Law on EIA, including the organisation of a mandatory public hearing held in Nikšić on 20 November 2024 at the premises of the Municipality Hall (Njegoševa 18). The hearing was open to all interested parties, including affected communities, NGOs and relevant authorities. Following the disclosure and consultation process, and having considered the comments received, the EPA issued a positive Decision approving the EIA on 19 December 2024, thereby completing the national-level consultation phase.

During the preparation of the EIA, additional early engagement was conducted with local residents of Rudine. On 20 October 2024, interviews were held with households located approximately 25 m east and 180 m west of the project boundary. Discussions focused on current land use, seasonal activities, agricultural livelihoods, and community perspectives on the planned project. Residents did not express opposition to the development, and no concerns or complaints were raised during these meetings.

Furthermore, prior informal consultations were held with local landowners and community members even before the EIA process formally started. Initial negotiations began on 15 December 2022, followed by the signing of a voluntary land lease agreement on 24 May 2023. Additional consultations were held on 10 June 2023 with neighbouring households to present development intentions and discuss possible local benefits. All consulted landowners expressed their support for the Project. These activities helped establish a cooperative relationship and contributed to a positive social environment for further engagement.

Land acquisition for the Project has so far been conducted exclusively through voluntary, market-based agreements, including the signing of sales-purchase contracts with local landowners. These transactions represent a direct form of consultation and agreement with Project Affected Persons and demonstrate the absence of involuntary resettlement or disputes over land needed for the Project.

With these activities completed, the Project now moves into the ESIA Scoping phase supported by the EBRD, during which stakeholder engagement will be expanded, formalised and aligned with the requirements of EBRD PR10 – Information Disclosure and Stakeholder Engagement.

4.4.2. Consultations During the Development of the Spatial Plan of Montenegro

In June 2025, the Parliament of Montenegro adopted the Spatial Plan of Montenegro until 2040, which includes the construction of new SPP Rudine and reconstruction of OHL 110kV Niksic-Bileca.

Before the adoption of the Spatial Plan, the Ministry of Spatial Planning, Urbanism and State Property conducted a public consultation process, as required by the Law on Spatial Planning and Construction. This process included both the Draft Spatial Plan and the accompanying Strategic Environmental Assessment Report.

The full draft of the planning document was available on the Ministry's website: www.gov.me/mdup/javna-rasprava. The consultation period ran from 29 January to 29 April 2024. During this time, the Ministry, in cooperation with local municipalities, organised public presentations of the Draft Plan across all municipalities — including in Niksic Municipality where the Project is located. The public was also invited to submit comments and feedback either in person at the Ministry's offices or via email.

4.4.3. Consultation during development of Spatial-Urban Plan for Municipality of Niksic

A Public Consultation Report was prepared after the consultation period. Importantly, no comments or objections were submitted specifically regarding the reconstruction of 110 kV transmission line from Niskic to Bileca neither for SPP Rudine.

As part of the spatial planning process, public consultations on the Draft Amendments to the Spatial-Urban Plan of the Municipality of Nikšić were organized by the Ministry of Ecology, Spatial Planning and Urbanism in the period from 3 to 30 March 2023.

A central public presentation was held on 24 March 2023 in the Assembly Hall of the Municipality of Nikšić, with the participation of representatives of the Ministry, the Chief City Architect, local government representatives, and interested spatial users. The presentation included an overview of the planned spatial solutions, followed by an open discussion covering topics such as transport, hydrotechnical and energy infrastructure, infrastructure corridors, and planning solutions for individual sites and facilities.

A total of 40 written comments were submitted during the consultation period. None of the submitted comments or the issues discussed at the public presentation were related to the Rudine Solar Power Plant project or its associated infrastructure, and no objections to the project were recorded. The full draft of the planning document was available on the Ministry's website: <https://www.gov.me/clanak/izvjestaj-o-javnoj-raspravi-o-nacrtu-izmjena-i-dopuna-prostorno-urbanistickog-plana-opstine-niksic>.

4.4.4. Consultations During the Development of the Transmission System Development Plan

The Montenegrin Transmission System Operator (CGES) prepared the Transmission System Development Plan for the period 2025–2032, which outlines the planned development of the national transmission network over the medium and long term.

This updated Plan includes, among other investments, the reconstruction of the existing 110 kV transmission line Nikšić–Bileća, which will be used to connect the planned PV plant to the transmission network.

In accordance with the Rules for the Preparation and Monitoring of the Implementation of Transmission System Development and Investment Plans, CGES announced a public consultation on the draft Plan on 7 April 2025, inviting all interested parties to submit their comments, suggestions, and proposals via email, post, or in person at the CGES headquarters, by 28 April 2025.

The public notice was published on the CGES website and through social media channels, and the consultation period lasted 20 days, in line with regulatory requirements.

According to the publicly available Public Consultation Report, no comments, suggestions, or requests for consultation extension were received during the consultation period, and the process was therefore formally concluded.

5. Grievance Mechanism

5.1. Introduction

Qair Rudine d.o.o. will establish a Grievance Redress Mechanism (GRM) to receive, address, and resolve stakeholders' concerns and grievances in a timely and effective manner. The mechanism will ensure that all complaints are handled through a clear, transparent, and culturally appropriate process, which will be accessible to all segments of affected communities, free of charge, and without any risk of retribution for those who submit grievances.

Information about the grievance mechanism, including how to submit complaints, will be disclosed to affected communities and other stakeholders through this Stakeholder Engagement Plan (SEP) and the Company's website. Qair Rudine d.o.o. will also regularly report to the public on the implementation of the grievance mechanism, while safeguarding the privacy and confidentiality of individuals who submit grievances.

5.2. Grievance Mechanism Principles

The grievance mechanism will follow the following principles:

5.2.1. Communication

In order to effectively address complaints, Qair Rudine d.o.o. will outline its grievance mechanism in writing, publicise it and explain it to all affected parties. As with all information, this disclosure will be provided in a format and language readily understandable to the local population, simple enough so that it does not require legal counsel to complete. A Grievance submission template is provided in Annex 1.

5.2.2. Transparency

The grievance process will be transparent, fair, readily understandable, accessible and culturally appropriate for all affected parties — with particular attention to vulnerable groups, whose concerns are often not adequately heard. Qair Rudine d.o.o. will clearly communicate from the outset who can use the grievance mechanism and will assure all potential users that there will be no costs or retribution associated with submitting a grievance. Furthermore, the Company will ensure that personal data is treated in accordance with national legislation on data protection and privacy.

Grievances submitted anonymously will be addressed with the same diligence, although no direct response can be provided in such cases.

The entire process — from how a complaint is received and registered, through its review and decision-making, to potential appeal options — will be made as transparent as possible through clear and regular communication with stakeholders.

5.2.3. Timing

All grievances will be registered and acknowledged within 5 working days and responded to within 20 working days of receiving the grievance. During critical time periods, such as construction, it is important to have an immediate response to time-sensitive complaints, such as a fence being knocked down by a contractor, for example, and livestock getting out.

5.2.4. Written Records

Qair Rudine d.o.o. will keep a written record of all grievances, as this is critical for effective grievance management. The grievance log will include the name of the individual or organisation (if provided), the date and nature of the grievance, details of any follow-up actions taken, the final resolution, and how and when the decision was communicated to the complainant. All records will be securely stored and handled in accordance with national data protection legislation, ensuring the confidentiality of personal information.

5.2.5 Grievance Reporting

All public comments, by email, fax or phone can be made to the following communication lines:

Organization	Qair Rudine doo, Podgorica
Responsible person	<i>Stefan Klikovac</i>
Address	<i>Bulevar Džordža Vašingtona 19, Podgorica</i>
Telephone	<i>+38269480118</i>
Fax	
e-mail	s.klikovac@qair.energy

Complaints in writing can make use of the dedicated Grievance Reporting Form outlined in Annex 1. The use of the form will be explained to stakeholders during stakeholder engagement activities and through the company web page.

All complaints, written or in oral form, are to be submitted for consideration to the competent individuals which may include Qair Rudine d.o.o management and specialists, consultants, etc.

Written responses will be provided to those who submitted complaints, after internal decision making and resolution of complaint. A summary of all comments and decisions addressing them will be made upon completion of the consultation period.

6. Monitoring and Reporting

6.1. Monitoring Stakeholder Engagement Activities

Throughout all consultation activities, stakeholders will be asked targeted questions to help evaluate the effectiveness and quality of the stakeholder engagement process. These questions will be tailored to the audience and context but will aim to assess whether the consultation process has been conducted in a manner that is free of manipulation, interference, coercion, or intimidation, and whether it is based on timely, relevant, understandable, and accessible information presented in a culturally appropriate format.

A guideline for preparing the questionnaire is presented in Table 6.1 below. The example questions are designed to yield a simple YES/NO answer, while the Evaluation Criteria column provides a framework for assessing the overall effectiveness of the engagement (H – High, M – Medium, L – Low).

Table 6-1: Evaluation of Meetings

Evaluation Aspect	Example questions to be asked to stakeholders	Rate of Evaluation
Free of manipulation, interference, coercion, and intimidation	Have you been in any way intimidated or coerced during this consultation process? Have you been in any way unduly incentivised to support the Project?	- H (more than 75% of stakeholders answering No) - M (between 35% and 75% answering No) - L (less than 35% answering No)
Timely, relevant, understandable and accessible information	Do you think you have been provided with all relevant information in advance of this meeting? Do you feel that enough time was allowed to review project information and submit comments? Do you think you had enough opportunities to meaningfully influence the project design (e.g., mitigation measures, benefit sharing, siting, location, routing, scheduling)?	- H (more than 75% of stakeholders answering Yes) – - M (between 35% and 75% answering Yes) - L (less than 35% answering Yes)
Relevant, understandable and accessible information	Did you find the information discussed during this meeting useful? Did you find the material distributed/shown adequate and complete, including draft documents and plans?	- H (more than 75% of stakeholders answering Yes) - M (between 35% and 75% answering Yes)

	Do you think it is clear how Qair Rudine d.o.o. will consider your comments on mitigation measures, benefit sharing and implementation issues in the final project documents? Do you think you were consulted in a culturally appropriate way? After the meetings, do you feel you fully understand how the Project will affect your life?	-L (less than 35% answering Yes)
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The results of these evaluations will be collected after each consultation and monitored over the course of the stakeholder engagement process. On a regular basis (and at least after each round of engagement), Qair Rudine d.o.o. will review the key indicators to evaluate the effectiveness of engagement.

This approach will help identify trends and areas of concern over time. A medium or low score following a meeting or engagement phase will indicate that corrective measures are needed. These may include reviewing the information disclosed to stakeholders, revising the meeting schedule or locations, or organising additional targeted meetings with specific stakeholders to clarify concerns.

6.2. Reporting Stakeholder Engagement Activities

All stakeholder engagement activities will be recorded by Qair Rudine d.o.o throughout the Project. The purpose of such records is to ensure that communication with stakeholders is accurately logged so that views expressed are taken into consideration by the project and that any commitments made are delivered.

The results of stakeholder engagement activities, including how stakeholder comments have been taken into account, will be reported in ESIA reports and documented in the relevant annexes attached to this document.

ANNEX 1: GRIEVANCE SUBMISSION FORM

Public Grievance Form

You may report any grievance or incident anonymously however please note that by providing your name below, you agree to be contacted by the company and to have your name shared with individuals responsible for resolving the situation.

Personal Details	
Full Name	
Contact information and preferred method of communication Please mark how you wish to be contacted (post, telephone, or e-mail) and provide your contact details. <i>Leave blank if reporting anonymously.</i>	☐ By Post: _____ _____ _____ ☐ By Telephone: _____ ☐ By E-mail: _____
Grievance or Incident Details	
Date	
Ongoing issue?	Yes / No
Location (Including parcel number if applicable)	
Detailed description (e.g., parcel number, cadastral municipality, injuries, property damage, people involved and similar)	
Any other comments?	

Signature: _____

Date: _____

Please return this form to:
 Stefan Klikovac
 Qair Rudine doo, Podgorica
 Email: s.klikovac@qair.energy
 Phone: +38269480118

ANNEX B: Stakeholder Groups

No.	NGO Name	Area of Focus	Relevance to the Project	Geographic Scope
1	Green Home	Environment, climate change, biodiversity, energy	National NGO active in environmental protection, monitoring, and advocacy. Regularly participates in consultations on energy and infrastructure projects.	National
2	CZIP – Center for Protection and Research of Birds	Biodiversity, ornithology, protected areas	Key stakeholder for biodiversity issues, particularly bird monitoring and protection.	National
3	Ozon – Environmental Movement	Environmental protection, air quality, public participation	Active in Nikšić and nationally on environmental issues, public consultations, and legal procedures.	National / Local
4	NGO Društvo mladih ekologa Nikšića (Society of Young Ecologists of Nikšić)	Biodiversity, youth engagement, environmental education	Based in Nikšić, active in nature protection, awareness raising and biodiversity monitoring.	Local (Nikšić)
5	Association of Beekeepers “Piva – Plužine”	Biodiversity, pollinators, local livelihoods	Relevant for ecosystem services and potential indirect effects on beekeeping.	Regional
6	NGO “Green Piva”	Sustainable tourism, biodiversity protection	Focused on sustainable use of natural resources and eco-tourism in western Montenegro.	Regional
7	Association of Farmers of Banjani and Oputne Rudine	Agriculture, rural development	Represents local farmers in the project area; relevant for land use, livelihoods, and local benefits.	Local (Banjani & Oputne Rudine – Nikšić)
8	Mountaineering and Ecological Associations (local)	Cultural and natural landscape protection	Relevant for landscape, recreational use, and cultural heritage aspects in the wider area.	Local
9	NGO Green Piva & Environmental and Tourism Values Association	Sustainable development, tourism, environment	Interest in infrastructure impacts on protected areas and local development.	Regional / National