

**DOCUMENT OF THE EUROPEAN BANK  
FOR RECONSTRUCTION AND DEVELOPMENT**

**STRATEGY FOR SERBIA**

**REPORT ON THE INVITATION TO THE  
PUBLIC TO COMMENT**

## **Strategy for Serbia: Report on the invitation to the public to comment**

### **1. Invitation to the public to comment as part of the review process.**

In accordance with the EBRD Public Information Policy (PIP), the draft Strategy for Serbia was posted on the website for 30 days from 19 December 2006 along with an invitation to the public to comment. The public was invited to submit comments on the draft Strategy no later than 20 January 2007.

Two comments were received during the public comment period. Details of the comments received and staff responses are provided in this Report, which becomes an addendum to the Strategy.

## 2. Comments received and staff responses

### The Ministry of Labour, Employment and Social Affairs, Serbia

The Ministry of Labour, Employment and Social Affairs, Serbia, expressed its interest in the review of the Country Strategy for Serbia, and noted that closer attention should have been given to employment issue, specially in regards to the adopted National Employment Strategy for period 2005-10 and, with the assistance of the European Agency for Reconstruction, the National Action Plan for employment for 2006-08.

**Staff response:** These comments have been taken into account in the revised version of the Strategy. Information on the National Employment Strategy and the National Action Plan for employment are now included in the Strategy.

### CEKOR/Serbian coordinator for CEE Bankwatch Network

The received comment from CEKOR beside the set of overall comments includes specific comments regarding the sustainable energy and transport issues and the EIA processes in Serbia. The received comments can be summarised as follows:

- The Bank's Draft Strategy for Serbia does not recognize sustainable development as a fundamental aspect of sound business management and it is not clear how the Bank will endeavour to ensure a healthy environment in Serbia, when performing its operations.
- The improvement of environmental compliance and enforcement of environmental legislation, inspection service and access to justice are fundamental to prepare the ground for further infrastructure projects at the local level. The transparency issue in Serbia should be more reflected, despite huge improvement in planning, procurement and implementing of projects.
- Sustainable energy issues and sustainable transport should be mentioned in the Strategy. It is mentioned that PPP schemes will be particularly important in the road sector in Serbia and that the Bank is directly supporting only highway roads, while railways, multimodal shift and public transport are not being considered. We are aware that there is no updated transport strategy for Serbia, and because of that we see the EBRD as a possible catalyst of sustainable transport. Energy efficiency, renewable resources and resource recovery should be emphasized.
- The EIA processes in Serbia should follow the EU practice.

**Staff response:** As emphasised in the Strategy, the EBRD will continue to ensure that EBRD-supported investment projects in Serbia are implemented according to EBRD Environmental Policy, which requires the Bank to ensure that its policies and business activities promote the principles of sustainable development. The Bank will also continue to ensure that, for those investment projects requiring EIA, this process is carried out according to EU, national and EBRD Environmental Policy requirements. The Bank is ready to consider PPPs in areas other than the roads sector, for example in the energy sector. We agree that the Bank can be a catalyst for sustainable energy and transport policies and we intend to promote these where possible in our policy dialogue with the authorities.