



Independent
Project
Accountability
Mechanism

Problem Solving Completion Report

Belgrade Solid Waste Public Private Partnership

EBRD Project Number 46758

Case 2021/01 (Request #2)

April 2026

The **Independent Project Accountability Mechanism (IPAM)** is the project grievance mechanism of the EBRD. It reviews environmental, social, and Project disclosure-related concerns raised by Project-affected people and civil society organisations. IPAM can address concerns through two avenues: i) Problem-solving, which supports dialogue between Requesters and Clients without attributing blame or fault; or ii) Compliance, which determined whether the EBRD has complied with its Environmental and Social Policy and Access to Information Policy in relation to the Project.

For information about IPAM, please contact us at ipam@ebrd.com or visit the [IPAM webpage](#).

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Unless otherwise indicated capitalised terms used in this report are those as set forth in the 2019 Project Accountability Policy.

Acknowledgements

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The good will and solution-oriented approach of all Parties named here have been fundamental to the success of the initiative and the implementation of the remedial actions in this case.

List of Abbreviations

Abbreviation	Long Form
Board	the Board of Directors of the European Bank for Reconstruction and Development
Case	the consideration of a Request under the Project Accountability Policy following its registration
CAO	the Chief Accountability Officer of the EBRD, and IPAM head
Case Registry	the registry of Cases created in accordance with Section III, Paragraph 3.1 of the Project Accountability Policy, which can be found on the IPAM Webpage
CSO	Civil Society Organization
EBRD (or Bank)	the European Bank for Reconstruction and Development
ESP	the EBRD's Environmental and Social Policy in force at the time of Project approval
IPAM	the Independent Project Accountability Mechanism of the EBRD established as per the 2019 Project Accountability Policy
IPAM Head	the EBRD managing director responsible for the running of IPAM, the implementation of the Project Accountability Policy and for making the decisions that are the responsibility of IPAM under said Policy
PAP	the 2019 Project Accountability Policy
Parties	the individuals, entities, and/or organisations with a direct interest in a Case. Parties may include (but are not limited to): the Requesters; their Representatives, if any; the relevant Bank department, team, or unit; the Client; and other Project financiers or other entities responsible for the implementation of a Project
Problem-Solving	the IPAM function which supports voluntary dispute resolution engagement between Requesters and Clients to resolve the environmental, social, and public disclosure issues raised in a Request, without attributing blame or fault.
PSD	Project Summary Document
President	the President of the EBRD
Request	The communication submitted by a Requester or the representative to IPAM under this Policy

Executive Summary

This Completion Report provides the Board with a summary of the Independent Project Accountability Mechanism (IPAM) Problem-Solving initiative for **Case 2021/01 (Request #2)** linked to the **Belgrade Solid Waste Public Private Partnership (EBRD Project 46758)**. The Request—submitted in November 2020 by Roma waste-picker households affected by the 2018–2019 relocation from the Vinča landfill—raised concerns regarding physical and economic displacement, adequacy of housing solutions, and affordability of rent and utilities, alongside requests for confidentiality due to perceived risks of intimidation and reprisals.

From **May 2021**, IPAM facilitated structured engagement among the Requesters and their representatives, the Client, the relevant municipalities (Belgrade, Vladimirci and Šabac) and EBRD Management. Following an extended dialogue period, the Parties concluded **Problem-Solving Agreements on 4–5 July 2023**, translating the concerns raised into a time-bound package of **47 remedial actions**. Implementation required sustained coordination across multiple public institutions and service providers, with IPAM’s role focused on enabling delivery, verifying completion, and maintaining a safe space for engagement under confidentiality arrangements.

- **Achievements—housing stability secured:** housing solutions were delivered for **all 17 resettled households**, including formal social housing allocations (with a late allocation in Belgrade in September 2024).
- **Achievements—affordability and access to services improved:** agreed legacy utility debts (up to December 2022) were addressed to enable reconnection and access to subsidised tariffs, alongside facilitated access to social benefits, healthcare and emergency assistance for eligible households.
- **Achievements—tangible support and pathways to livelihoods:** agreed household items (furniture, appliances and tools) were delivered, and employment and training opportunities were repeatedly offered and, where taken up, led to formal employment outcomes (notably in Šabac and for several households in Belgrade).

IPAM monitored implementation from **July 2023 to December 2025** through continued engagement, in-country field visits and the deployment of a local monitor and issued **three monitoring reports**. By end-2025, the Parties had completed **45 of 47 actions (96%)**. The monitoring period was extended beyond the original timeline to address two persistent, institutionally complex issues: **(i)** utility enforcement fees affecting some households in Belgrade (with limited responsiveness from the utility provider and new arrears complicating resolution), and **(ii)** an unresolved structural housing issue in Vladimirci linked to a contractual dispute. In **December 2025**, having assessed the remaining actions as non-material to the core outcomes and unlikely to be resolved through further monitoring, IPAM informed the Parties of its intention to close the Case; the Requesters’ representatives agreed to conclude monitoring, and IPAM is proceeding to close **Case 2021/01**.

Challenges and residual issues encountered during implementation included:

- **Multi-actor delivery risk:** implementation depended on sustained coordination across three local administrations and multiple service providers; changes in local authorities contributed to delays and required additional on-the-ground follow-up.
- **Utilities-related constraints in Belgrade:** while historic debts were settled as agreed, enforcement fees on some accounts proved difficult to verify and resolve, compounded

by limited responsiveness from the utility provider and the emergence of new arrears for some households.

- **Technical/legal ambiguity in Vladimirci:** a contractual dispute over works meant an agreed structural solution (enclosing porches) was not delivered, and local legal interpretation treated the space as compliant irrespective of enclosure.
- **Livelihood restoration realities:** training and formal employment opportunities did not translate into uniform uptake, reflecting households' individual circumstances and the interaction between formal employment and eligibility for social assistance.

The Parties agreed that, while certain actions could not be completed due to the local context, the Problem-Solving process had addressed the more substantive concerns raised in the Request and therefore the Case could be closed.

This Report will be circulated to the Parties and disclosed in the virtual case file for [Case 2021/01](#) on the IPAM Case Registry in both English and Serbian, following its submission to the EBRD Board of Directors and the President for information. Once this disclosure takes place, IPAM will consider the case to be successfully completed and closed.

1. Background

1.1. The Request

The Request¹ was submitted to IPAM on 24 November 2020 by five families of Roma waste pickers represented by A11 - Initiative for Economic and Social Rights and advised by CEE Bankwatch. Requesters alleged that the [Belgrade Solid Waste PPP](#) (46758) caused them physical and economic displacement as they had to move from the Vinca landfill where they used to live and work. During the Assessment stage 12 additional affected families that were relocated from the Vinca landfill joined the IPAM Case, making 17 households² in total. Requesters expressed that they received no temporary housing, or for some of them the housing that was offered wasn't adequate, and they were unable to pay utility costs. In addition, Requesters claimed that lost personal property during the resettlement process and the resettlement process had not complied with the local legislation of Serbia and the EBRD's Environmental and Social Policy. Requesters asked for their identities to be kept confidential as a precautionary measure, due to concerns of potential intimidation, pressure, and reprisals and expressed interest in Problem Solving.



Waste picker at Vinca landfill before remediation. Source: Beo Čista Energija

1.1 The Project

The [Belgrade Solid Waste PPP](#) (46758) involved debt financing of up to EUR 70 million to Beo Čista Energija d.o.o. Beograd, which was responsible for the construction of new sanitary landfills, an energy from-waste facility for the thermal treatment of solid municipal waste, and the production of electricity and heat for the residents of Belgrade. The Project also envisaged the construction of a landfill gas facility, a leachate collection system and treatment facility, and construction and demolition waste recovery facilities. The Project also received financing support from the International Finance Corporation of up to EUR 70 million.



Vinca landfill leachate treatment plant. Source: Beo Čista Energija

¹ The Request and supporting documentation are available at: [Case 2021/01](#)

² A11 submitted complaints from two additional families, but those were rejected as the other Parties in the process expressed that they didn't participate in the census of Roma waste pickers conducted by the City of Belgrade in 2016 and were not included in the Resettlement Action Plan.

The existing Vinča landfill had been in operation since 1977 and was subject to remediation under the Project, including stabilisation and covering works.

Under the Project's Public Private Partnership, the City of Belgrade was responsible for land acquisition and resettlement activities and prepared a Resettlement Action Plan in 2018 in line with the EBRD's Environmental and Social Performance Requirement 5. Relocation activities took place between December 2018 and January 2019 in Belgrade, Šabac, and Vladimirci.

The Project was approved for financing by the EBRD Board of Directors on 18 September 2019 and was categorised as Category A under the EBRD's 2014 Environmental and Social Policy. At the time of preparation of this Report, the loan was in the repayment stage.

1.2 Processing to date

IPAM registered the Request on 14 January 2021 as [Case 2021/01](#), in accordance with the 2019 Project Accountability Policy, and initiated the Assessment stage. During the Assessment, IPAM engaged with the Requesters, their representatives, the Client, relevant municipalities, and EBRD Management to understand the concerns raised in the Request and to assess the Parties' willingness to engage in Problem Solving.

Following the completion of the Assessment stage and based on the expressed willingness of the relevant Parties to participate, the Case proceeded to IPAM's Problem Solving function in May 2021. Parties agreed that the scope of the initiative would be limited to the issues around (i) adequate and sustainable housing for resettled families; (ii) affordable costs for rent and utilities; (iii) waste pickers' access to education; and (iv) income generation for resettled families.

IPAM facilitated a multistakeholder Problem Solving initiative involving the Requesters and their representatives, the Client, the City of Belgrade, the Municipality of Vladimirci, the City of Šabac, and EBRD Management.

The Problem Solving Agreements were signed on 4 and 5 July 2023 during meetings held in Belgrade and Vladimirci. The Agreements set out actions aimed at addressing the concerns raised in the Request and included provisions for IPAM to monitor implementation, given that certain actions required additional time to be completed.

Following the signing of the Agreements, the Case was transferred to the Problem Solving Monitoring stage, during which IPAM monitored the implementation of the agreed actions in line with the Project Accountability Policy.

2. Agreement Monitoring Activities

Following the signing of the Problem Solving Agreements in July 2023, [Case 2021/01](#) entered the Agreement Monitoring stage. IPAM monitored implementation of the agreed actions between July 2023 and December 2025 in line with the Project Accountability Policy.

In accordance with paragraph 2.5(a) of the Project Accountability Policy, IPAM considers an agreement to be completed when (i) the commitments made by the Parties are being effectively carried out to the extent possible, and (ii) implementation timetables are being met.

In line with the Policy, IPAM's monitoring activities included consultation with the Requesters, the Client, EBRD Management, and other relevant stakeholders; review of Project documentation, documentation submitted by the Parties, and publicly available information; site visits to the Project area as deemed necessary; and engagement of consultants on specific technical matters, as required.

Monitoring activities were undertaken following the signing of the Problem-Solving Agreements and continued until the conclusion of the monitoring period in December 2025.

During the monitoring period, IPAM engaged with the Parties through virtual meetings and written correspondence to seek updates on implementation of the Problem-Solving Agreements. IPAM also conducted field visits to Serbia and appointed a local monitor. IPAM reviewed documentation shared by the Parties to monitor progress in implementation.

The full case timeline is presented below:

Table 1: Case 2021/01 Timeline

Date	Action
2020	
24 Nov	Request received
7 Dec	Acknowledgement sent to the Requesters
2021	
14 Jan	Registration Notification
20 Apr	Assessment report (Jan-Apr 2021)
May-Dec	Dialogue sessions
2022	
Jan - Dec	Dialogue sessions - continued
2023	
4-5 Jul	Problem-Solving Agreement signed
Nov	Problem-Solving Summary Report is issued
2024	
Jun	ToR for local monitor approved and hired to undertake monthly visits
Feb – Oct	Field visits to Belgrade by IPAM to support the implementation
Apr	1 st Problem-Solving monitoring report issued
Sep	2 nd Problem-Solving monitoring report issued
2025	
Jun	3 rd Problem-Solving monitoring report issued
Dec	Case closure agreed
Apr 2026	Closing of case

IPAM issued three monitoring reports during the monitoring stage. The agreement monitoring reports for Case 2021/01 are available in IPAM's virtual case registry in both English and Serbian, providing full detail of the monitoring activities undertaken and outcomes of each period. Below is a summary of the key monitoring activities undertaken from 2023 to 2025.

Box 1. Summary of monitoring activities undertaken from July 2023 to May 2025

Following the signing of the Problem-Solving Agreements in July 2023, IPAM monitored implementation through three formal monitoring periods, characterized by the following activities:

Core monitoring modalities

Regular engagement with Parties through virtual meetings and written exchanges to track progress and unblock implementation challenges.

Multiple in-country monitoring visits to Serbia:

December 2023 (first monitoring visit)

February and March 2024 (second monitoring period)

August and October 2024 (third monitoring period).

Systematic document review, including confirmations from municipalities, utilities, social services and the Client, to verify delivery of agreed actions.

Deployment of a local monitor

From early 2024, IPAM hired a local monitor to mitigate delays caused by changes in local administrations and to maintain continuity on the ground.

The local monitor:

- Conducted monthly household visits.
- Supported Requesters in accessing social services, utilities, employment offices, and education/training information.
- Acted as an interface with municipalities where institutional follow-through was weak.

Source: Case 2021/01 Belgrade Solid Waste PPP – Problem Solving Monitoring Reports 1 to 3.

3. Problem Solving Outcomes

The agreement signed by the Parties contained 47 actions subject to monitoring. At the end of the monitoring stage, 45 had been fully implemented, while two were only partially implemented.

Across Belgrade, Vladimirci and Šabac, monitoring confirmed that:

- **Housing solutions** were delivered to all 17 resettled families, under formal social housing allocations (including a late allocation in Belgrade in September 2024).
- **Access to social benefits, healthcare and emergency assistance** was secured for all eligible Requesters.
- **Utility debt legacy issues** (up to December 2022) were covered as agreed, enabling reconnection and access to subsidised tariffs.
- **Furniture, appliances and tools** were delivered to all affected households.
- **Employment and income opportunities** were actively offered:
 - Formal employment secured for all Requesters in Šabac and several in Belgrade.

- Others made an informed choice to pursue informal or seasonal work to retain eligibility for social assistance.
- **Education and vocational training opportunities** were made available, with repeated outreach and enrolment support, notwithstanding limited uptake by Requesters.

By the end of 2024 and into 2025, monitoring confirmed that most agreed actions were completed, but two categories of issues remained unresolved, leading IPAM to continue monitoring for one more year, beyond the original December 2024 deadline. The outstanding issues were:

Utility enforcement fees in Belgrade

While historic utility debts were settled, new or unclear enforcement fees continued to appear on some accounts. Despite sustained engagement by IPAM, only three out of eight families had their fees written off. Obtaining information about the nature of these fees was hindered by limited responsiveness of the utility provider. In addition, post-2023, new utility debts were incurred by some of the households, complicating verification of penalty charges.³

Unresolved structural housing issue in Vladimirci

In May 2023 the five families resettled to Vladimirci moved to the newly built houses provided. External porches were built on four out of five houses to allow for sufficient living space. However, the porches have not been closed as agreed due to a contractual dispute.

IPAM engaged with all relevant Parties to determine if the porches could be closed, but with no success. The response that IPAM got was a reference to the Serbian housing law, which considers the porch area as living space, regardless of whether it is enclosed, or not. Therefore, the porches remain open.

4. Lessons learned

The monitoring process for [Case 2021/01](#) highlights several institutional and operational lessons relevant for future IPAM problem-solving cases:

1. Importance of continuity safeguards

Political transitions and elections can significantly delay implementation when agreements rely on municipal action. Built-in mechanisms (e.g. local monitors or escrow-type arrangements) are essential to preserve continuity.

2. Value of a local presence

The local monitor proved critical in maintaining trust, verifying delivery on the ground, and supporting vulnerable households with administrative processes. This model reduced reliance on formal municipal follow-up where capacity or incentives were limited.

3. Need for realism in livelihood restoration

Repeated offers of training and formal employment did not automatically translate into uptake. Socio-economic incentives (notably the interaction between formal employment and eligibility for

³ Some households, therefore, remain ineligible for reduced utility costs due to existing debt, which is a condition set in local regulation.

social benefits) materially influenced Requesters' choices and should be explicitly factored into future agreement design.

4. Clarity on technical and legal obligations

Ambiguities around housing standards and utility enforcement regimes created long-tail issues that were difficult to resolve at the monitoring stage. Future agreements would benefit from clearer legal anchoring and verification mechanisms for technically complex commitments.

5. Conclusion and next steps

The monitoring mandate of IPAM allowed it to oversee the implementation of the agreement signed by the Parties in [Case 2021/01](#). It included 47 actions to address the concerns raised by the families physically and economically displaced from the Project area and who filed a complaint with IPAM through the local civil society organisation A11 in late 2020.

The monitoring stage lasted two and a half years, from July 2023 to December 2025, after which 45 of the agreed actions were completed (96%). During this period, local conditions changed, such as changes in local authorities, which limited the full implementation of the agreement. However, after engagement with the Requesters' Representatives and the Client, IPAM decided to end the monitoring and close the case, even though two actions remained open.

The Requesters' representatives and the Client acknowledged that the IPAM process had resulted in substantial progress toward addressing the concerns raised by the displaced families. Both parties agreed that, given the current situation and local conditions, further extension of the monitoring phase was unlikely to bring about improved outcomes beyond what had already been accomplished. This consensus supported the decision to conclude the monitoring stage, recognizing the effectiveness of the actions undertaken up to that point.

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