

# **GEOTECHNICAL INVESTIGATION AND MAIN DESIGN OF A LANDFILL BODY EXTENSION – DUBOKO REGIONAL LANDFILL, SERBIA**

## **STAKEHOLDER ENGAGEMENT PLAN**

**FINAL VERSION**

### **TASK 3.3: STAKEHOLDER ENGAGEMENT PLAN**

ENVIRONMENTAL INFRASTRUCTURE SUPPORT PROGRAMME  
PROCUREMENT REFERENCE: SW16/OC02-DU01  
PREPARED FOR: INTERNATIONAL MANAGEMENT GROUP (IMG)  
PREPARED BY: ENVIROPLAN S.A.  
SUBMITTED IN: MAY, 2016



**Assignment:** Consultancy Services for the Geotechnical / Geomechanical investigations, environmental & social impact assessment & the main design for Duboko Regional Landfill Extension Project, Serbia

**Reference No:** SW16/OC02-DU01

**Document title:** **Task 3.3: Stakeholder Engagement Plan FINAL VERSION**

**Status:** Draft

**Date:** 26/05/2016

**Client:** **International Management Group (IMG)**

**Project Manager:** Branimir Andjelic

**Consultant:** **ENVIROPLAN S.A.**

**Drafted by:** Mrs. Birgitt ALGER, Environmental & Social Impact Assessment Expert  
Mr. George C. LITAS, Environmental Expert  
Mrs. Georgia LOUKA, Team Leader, Waste Management Expert

**Read and approved by:** Mrs. Georgia LOUKA, Team Leader  
Mr. Theofanis LOLOS, Project Director

## Table of Contents

<b>1. STAKEHOLDER ENGAGEMENT PLAN (SEP).....</b>	<b>1</b>
1.1. Introduction .....	1
1.2. Objectives and identified stakeholders.....	1
1.3. Specific social aspects of the project .....	2
<b>2. CONSULTATION AND COMMUNICATION PROCESS .....</b>	<b>4</b>
<b>3. DISCLOSURE OF PROJECT DOCUMENTATION AND INFORMATION.....</b>	<b>6</b>
<b>4. GRIEVANCE MECHANISMS FOR STAKEHOLDERS .....</b>	<b>8</b>
<b>ANNEX I: DUBOKO GRIEVANCE MECHANISM.....</b>	<b>I</b>

# 1. STAKEHOLDER ENGAGEMENT PLAN (SEP)

## 1.1. Introduction

The International Management Group (IMG) has tendered the Consultancy Services for Geotechnical/Geomechanical investigations, Environmental & Social Impact Assessment (ESIA) and Main Design for Duboko Regional Landfill Extension Project in Serbia.

The contract was awarded to ENVIROPLAN S.A. and the overall objective of the Project of which this Contract is a part, is to enable the Duboko Waste Management Region to fulfill modern Serbian standards for waste disposal and operate in a sustainable manner. The project is made up of 4 components:

- **Component 1:** To identify the 'preferred' option for the short-term disposal of municipal solid waste from the Duboko Region. This component was complete and a preferred solution has been identified for further investigation.
- **Component 2:** To complete appropriate geotechnical soil mechanics investigations in order to determine an appropriate option for design and financing.
- **Component 3:** To prepare the Main Design for the agreed option and an ESIA, which will meet the EBRD PRs
- **Component 4:** To fulfill the statutory requirements and implement the works contract including supervision.

**Component 2 & 3** are included in the scope of this Contract.

The Project has been screened as a Category A project under EBRD's Environmental & Social Policy 2008 (<http://www.ebrd.com/downloads/research/policies/2008policy.pdf>) and has been assessed against the EBRD Performance Requirements (PRs) contained within the policy. And, it needs to meet the requirements for stakeholder engagement and public consultation as specified in the EBRD Environmental and Social Policy of 2008, its Public Information Policy and Performance Requirements (PRs).

This Stakeholder Engagement Plan has been developed, in accordance with PR 10 (Information Disclosure and Stakeholder Engagement) of the Policy.

It is worth mentioning that in the current project the issue is not the construction of a new landfill site, but the stabilization design and expansion of the existing landfill. In the case that the Duboko landfill stabilization and expansion works are within the scope of the existing construction permit then the new ESIA is not required by the national legislation but only as a standard procedure under the required processes of EBRD.

## 1.2. Objectives and identified stakeholders

Due to the importance of the stakeholder engagement from the very beginning of this project, a series of consultations was carried out during the ESIA scoping & screening phase and the main design phase, to discuss with and to keep informed the participating municipalities and the affected population.

The general aim of the Stakeholder Engagement Plan (SEP) is to identify, understand, and manage key social aspects related to the project, in order to maximize the potential positive impacts and minimize or eliminate the potential negative impacts that could be generated by the project.

The specific targets are:

- To spread in a clear and simple way the community relations, health, safety, and environment standards and policies that PUC Duboko expects all the personnel that will work in the project to comply with
- Make understand the project's global activities and related subjects that affect or are affected by its development
- Ascertain that the identified subjects be understood and treated between PUC Duboko and its contractors

The SEP will be based on the effective management of key subjects identified during the development of the Environmental and Social Impact Assessment deals with:

- Management of stakeholders' expectations and perceptions
- Minimizing impacts related to project's logistics
- Minimizing impacts related to construction phase
- Minimizing impacts related to operational phase
- Supporting local initiatives

Identified stakeholders are following:

- Public Utility Company Regional Waste Management Centre Duboko (PUC) Duboko
- Municipal authorities of the municipality of Uzice and of the other 8 founder municipalities: Arilje, Bajina Basta, Cacak, Cejetina, Ivanjica, Kosjeric, Lucani, Pozega.
- Ministry of Agriculture and Environmental Protection of the Republic of Serbia – Directorate for Environmental Protection
- Environmental Protection Agency of the Republic of Serbia
- Technical Control Team of Experts for design review
- European Bank of Reconstruction and Development (EBRD)
- Swedish International Development Cooperation Agency (Sida)
- All inhabitants in the proximity of the project area
- The eight private owner of land and the Agriculture Cooperative (owner of one part of needed area)
- Interested and/or involved NGOs

### **1.3. Specific social aspects of the project**

Some of the identified impacts refer to perceptions the population may develop with regard to the project. Notwithstanding the fact that these perceptions may be real or not, they may generate concrete actions by the population in favor or against the project. Therefore, these perceptions will also be taken care of.

During the ESIA process the risk of a social conflict was evaluated and the conclusion was that there exists no risk of a social conflict in the frame of this project. Moreover, the project will notably assure the future sound and smooth solid waste management operation of the PUC Duboko and of the population in the region on a mid-term level. The benefit for the population's health living conditions will be significant and for this, the acceptance of this project is very high.

During this project, possibly the routine of waste collection could be disturbed during the construction phase due to limited filling volume/space for waste in the existing landfill. In this case, we recommend to inform in time about an alternative waste collection schedule for the time of construction works, with clear indications of possible changes of the normal waste collection rhythm.



One important point of this project is the currently running expropriation process of nine parcels located on southern part of the landfill area. The process and the negotiation are still ongoing and this could bring up an uncomfortable feeling among the affected people if no compensation payment according to law and to PR 5 is granted.

In this sense, we recommend strongly to schedule and reach immediately an agreement on compensation for expropriated property, and define a negotiation strategy, if necessary, to assure the finalization of the expropriation within the time line of the project and avoid any delay of the construction work due to this matter.

## 2. CONSULTATION AND COMMUNICATION PROCESS

The involvement of the municipalities, local community organizations, the Technical Control Team of Experts for design review, etc., during the ESIA process is important, because allows incorporating the relevant recommendations into the project design and into the impact evaluation and mitigation. The project related information and consultation activities will be also carried out during all other phases of the project preparation and implementation, so that concerns of people potentially affected by the project could be known and addressed.

It is envisaged that consultation and communication activities will be among responsibility of PUC Duboko. Within PUC Duboko, the Technical Director Marko Milojević, is responsible for all the mentioned activities in this SEP.

Consultation objectives are the same as for all the SEP:

- To build internal and external understanding related to the global activities of the project that affect or are affected by its development
- To make sure that the identified issues be understood and treated between PUC Duboko and its stakeholders / contractors.

The communication and consultation process started during the Environmental and Social Impact Assessment (ESIA), but is not yet completed. The Consultation will continue with individuals and groups at local, regional and national level, during the construction and operational phases of the project and should be done by PUC Duboko. Consultation and communication is a continuous process and regular meetings with key local stakeholders should be programmed throughout the project.

A description of the recommended communication methods to be adopted by PUC Duboko for engagement is provided below. The objective of employing various methods is in order to ensure easy, transparent, direct, open and interactive communication with all stakeholders and to get as earlier as possible their feedback in the different phases of project implementation.

- 1) PUC Duboko will establish a Liaison Committee with key stakeholders and local communities for the Project. This committee will meet on a quarterly basis and will be facilitated by the Technical Director Marko Milojević and his Assistant Branko Nikolić of PUC Duboko, possibly with the support of IMG. The likely constitutes of the Liaison Committees will be the stakeholder group who may be directly or indirectly affected by the construction and operation, and are indicated below:

- Representatives of Public Utility Company Regional Waste Management Centre Duboko (PUC) Duboko
- 1 Representative of each the 9 founder municipalities (Uzice, Arilje, Bajina Basta, Cacak, Cejetina, Ivanjica, Kosjeric, Lucani, Pozega).
- 1 Representative of the Technical Control Team of Experts for design review
- Several Representatives of the neighboring population and interested NGOs

PUC Duboko can work with this “Stakeholder Liaison Committees for the Project” to provide technical and socio-economic updates and keep local community informed on the Project and other related activities and plans. Also, to inform local community and other relevant stakeholders about grievance mechanism and procedures as detailed within this SEP, and receive any grievances and complaints from local communities in accordance with the grievance procedure.

- 2) Invite to these quarterly meetings other relevant stakeholders (EBRD, SIDA, etc.), if the scope of meeting requires a wider participation or if aspects arise which should be discussed with these stakeholders.
- 3) Additionally, individual meetings will be undertaken by representatives from PUC Duboko with several governmental entities – to include Ministry of Agriculture and Environmental Protection of the Republic of Serbia – Directorate for Environmental Protection and the Environmental Protection Agency of the Republic of Serbia, etc.. The objectives of such meetings are mainly to review, agree, and implement the monitoring programs related to Environment, Health, and Safety (EHS) within the Project (to include air quality, noise, water resources, and occupational health and safety) and the review of Permitting Requirements.
- 4) Besides direct meetings, the consultation process will use other methods to stimulate discussion and dialog, like the radio, newspapers and press releases if necessary. An arrangement for visitor days for the general public, after conclusion of the construction works of cell 1 and at beginning of the operation, would be a good idea to show the result of the construction works and the smooth operation of the extended landfill facility.
- 5) Any level of consultation reasonably required to manage the social compromises of the Environmental and Social Management Plan and the Stakeholder Engagement Plan shall be implemented.

PUC Duboko is fully committed to a clear, transparent and continuous consultation process with stakeholders, throughout the duration of the project.

### 3. DISCLOSURE OF PROJECT DOCUMENTATION AND INFORMATION

Information about the project was provided to stakeholders at meetings during the ESIA S&S process and the design phase in March – November 2015. The final design and final ESIA will be disclosed by IMG and / or PUC Duboko.

The information provided about the project should be sufficient at least for describing what changes will be caused by the project, where these changes are expected and when they are expected.

PUC Duboko intends to provide all relevant information to stakeholders on the Project and the related expansion measures. Certain documents and information will be disclosed to relevant stakeholders, which includes: (1) regular updates on project activities (including on PUC Duboko website) and (2) disclosure of the ESIA, NTS & SEP.

#### (1) Updates on Project Activities

PUC Duboko will coordinate and work with the relevant stakeholders to provide updates and keep local community informed on any issue which could affect them related to the Project and related construction activities at the landfill. This is to be undertaken through the following:

- Leaflets/information in Serbian to be distributed to the municipal authorities of the municipality of Uzice and of the other 8 founder municipalities: Arilje, Bajina Basta, Cacak, Cejetina, Ivanjica, Kosjeric, Lucani, Pozega; and
- Project updates will also be made on the PUC Duboko Announcement Website: <http://www.duboko.rs/en/ecology/projects>

#### (2) Disclosure of the Project Documentation

All interested and affected parties will be able to find the following documents regarding the Project on the PUC Duboko website (<http://www.duboko.rs/en/ecology/projects>):

- Environmental and Social Assessment Study
- Non-Technical Summary (NTS)
- Stakeholder Engagement Plan (SEP)

These documents will remain in the public domain for the duration of the Project. The SEP will be updated periodically. Hard copies of these documents will be deposited at PUC Duboko (on-site) and in the city hall of Uzice. The address of PUC Duboko is shown below:

**JKP Duboko,  
Duboko b.b. 31000 Uzice, Serbia  
Tel.: 064/8387367; 064/8387358  
E-mail: [office@duboko.rs](mailto:office@duboko.rs)**

Stakeholders, including the public, will be able to use the grievance procedure and information on this procedure will be disseminated. The Grievance Procedure will also be available on the PUC Duboko website.

EBRD will disclose the ESIA on their website too ([www.ebrd.com](http://www.ebrd.com)).

We recommend that comments to the disclosed documents, especially to the ESIA, will be received as filled in forms with specified contact details for submission. Information leaflets, distributed within the project area, could provide contact details to encourage the population to



send their comments/sorrows/expectations. This should be carried out in forms, which appear to be the most acceptable for addressing the stakeholder interests. During construction phase, photos of the progress of the works could be provided via website or another media.

Whenever necessary, PUC Duboko and their contractors should provide more detailed information about technical aspects to the stakeholders.

## 4. GRIEVANCE MECHANISMS FOR STAKEHOLDERS

At the stage of construction and operation, the comments, questions and possible complaints should be addressed within the grievance mechanism. This mechanism should be based on written forms, which can be filled in by any affected person or organization and submitted to PUC Duboko, who will take action, if required, and within 15 days inform the author of grievance on the action taken in response to the submitted grievance. A grievance format is shown in **Annex I**.

In some instances it may be possible to resolve a grievance immediately. Where this is not possible the PUC Duboko will work through the following steps:

- **Step 1** Receive Complaint: Upon receipt of a completed form or get notification of a problem, someone is assigned to be responsible for resolving the grievance.
- **Step 2** Acknowledgement: A grievance will be acknowledged by letter within 15 working days of receipt. The acknowledgement will specify a contact person, their reference indicator and an anticipated target date for resolution.
- **Step 3** Investigation: The PUC will work to understand the cause of every grievance. Contact with the grievant may be necessary during this time.
- **Step 4** Resolution: once a grievance has been investigated, the results of the investigation and of the proposed course of action will be communicated to the grievant, if necessary.

If the grievant considers the grievance to be satisfactorily resolved, PUC Duboko would appreciate sharing that with him/her by signing a Statement of Satisfaction.

If the grievance remains unresolved it will be reassessed and the PUC Duboko will have further dialogue with the grievant to discuss whether there are any further steps which may be taken.

- **Step 5** Follow Up: The PUC Duboko may contact the grievant at a later stage to ensure that its activities continue to pose no further problems.

All grievances shall be monitored by PUC Duboko, Mr. Marko Milojević, Director of the Technical Department, who will be responsible for ensuring that a plan is developed and internally approved by the PUC Management Board (and if appropriate discussed with the grievant) as soon as reasonably practicable for any unresolved grievances. The plan's objective will be to bring unresolved grievances to a swift and fair resolution.

## ANNEX I: DUBOKO GRIEVANCE MECHANISM

Anyone can raise a grievance with PUC Duboko. The PUC Duboko will look into all grievances officially received.

The grievance will be reviewed and a decision taken whether it will be considered further.

In the event that the grievance is not connected to the PUC's activity or in the event that the PUC finds that they are working within the applicable Serbian and international standards, the grievance will not be further processed. In these cases this will be explained in writing to the grievant.

In all other cases the PUC will investigate whether they have failed to work to the intended standard and, if they have, identify measures which may be taken to prevent further occurrences.

The grievance mechanism will be made public throughout the public consultation process, and will be maintained during preparation, construction and operation activities.

The Technical Director Marko Milojević is responsible for the implementation, accurate process and monitoring of the grievance mechanism within PUC Duboko.

### REPORTING A GRIEVANCE

There are several ways to report a grievance:

- Send a completed Grievance Form (see appendix) to the address on the back of the form;
- Contact the PUC Director of the Technical Department, Mr. Marko Milojević. The contact details are also provided at the end of the leaflet;
- Send an email to the indicated address: [office@duboko.rs](mailto:office@duboko.rs)
- Call the PUC Duboko directly, on a confidential phone line at 064/8387367 and/or 064/8387358;
- It is also possible to leave a completed Grievance Form in the PUC Mail box.

### GRIEVANCE REVIEW PROCESS

In some instances it may be possible to resolve a grievance immediately. Where this is not possible the PUC Duboko will work through the following steps:

- **Step 1: Receive Complaint**

Upon receipt of a completed form or get notification of a problem, someone is assigned to be responsible for resolving the grievance.

- **Step 2: Acknowledgement**

A grievance will be acknowledged by letter within 10 working days of receipt.

The acknowledgement will specify a contact person, their reference indicator and an anticipated target date for resolution.

- **Step 3: Investigation**

The PUC will work to understand the cause of every grievance. Contact with the grievant may be necessary during this time.

- **Step 4: Resolution**

Once a grievance has been investigated, the results of the investigation and of the proposed course of action will be communicated to the grievant, should this be believed necessary.

If the grievant considers the grievance to be satisfactorily resolved the PUC would appreciate sharing that with him/her by signing a Statement of Satisfaction.

If the grievance remains unresolved it will be reassessed and the PUC will have further dialogue with the grievant to discuss whether there are any further steps which may be taken.

- **Step 5: Follow Up**

The PUC Duboko may contact the grievant at a later stage to ensure that its activities continue to pose no further problems.

All grievances shall be monitored by the PUC Duboko, Mr. Marko Milojević, Director of the Technical Department, who will be responsible for ensuring that a plan is developed and internally approved by the PUC Management Board (and if appropriate discussed with the grievant) as soon as reasonably practicable for any unresolved grievances. The plan's objective will be to bring unresolved grievances to a swift and fair resolution.

#### **CONFIDENTIALITY AND ANONYMITY**

Where requested, the PUC Duboko will protect the identity of the grievant, and will not disclose it without consent. Details of submissions and allegations will remain confidential within the team responsible for investigating the concerns. However, the situation may arise where it will not be possible to resolve the matter without revealing the grievant's identity (for instance where it is required to give evidence in court). The investigative team will discuss with the grievant whether and how best to proceed.

Where the grievant does not disclose his identity to the PUC Duboko it may make it more difficult to look into the matter, to protect the grievant's position or to give feedback. Accordingly, while PUC Duboko will consider anonymous reports, they are not encouraged. If the grievant insists on raising a concern anonymously, he will need to provide sufficient facts and data to enable the investigative team to look into the matter without his assistance.

**PUC DUBOKO PUBLIC GRIEVANCE FORM**

<b>Duboko Reference No:</b>	
<b>Full Name</b>	
<b>Contact Information</b>	<b>By Post:</b> <b>Please provide mailing address:</b>
<b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>	<b>By Telephone:</b> <input type="checkbox"/>
	<b>By E-mail:</b> <input type="checkbox"/>
<b>Preferred Language for communication</b>	<b>Serbian</b> <input type="checkbox"/>
	<b>English</b> <input type="checkbox"/>
<b>Description of Incident or Grievance:</b> What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
<b>Date of Incident/Grievance</b>	<b>One time incident/grievance (date )</b> <b>Happened more than once (how many times? )</b> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen to resolve the problem?</b>	

Signature:

Date:

**Please return this form to:**

Marko Milojević ; Branko Nikolić - JKP Duboko, Duboko b.b. 31000 Uzice, Serbia,  
 Tel.: 064/8387367; 064/8387358 or E-mail: office@duboko.rs