

**Public Water Management Company Srbijavode**  
**European Bank for Reconstruction and Development**

# Environmental and Social Impact Assessment, Climate Change Assessment and Technical Assessment for Pambukovica Dam in Serbia

## Stakeholder Engagement Plan

Reference: 2025/14

Final | 12 August 2025



This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

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# Abbreviations

Abbreviation	Definition
CM	Cadastre Municipality
DRP	Detailed Regulation Plan
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
GLR	Grievance Log Register
GRM	Grievance Redress Mechanism
KPI	Key Performance Indicator
MAFWM	Ministry of Agriculture, Forestry and Water Management
PAP	Project Affected Person
PGD	Building Permit Design Stage (Projekat za gradjevisku dozvolu)
PR	Performance requirement
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
WMD	Water Management Directorate

# 1. Introduction

The European Bank for Reconstruction and Development (the “EBRD”) is considering providing finance to the Republic of Serbia (the “Borrower”, or the “Client”), represented by the Ministry of Finance.

The Loan is expected to finance the construction of a new impoundment dam and reservoir infrastructure at Pambukovica including associated works such as upstream sediment traps, road realignment etc. (the “Project”). Proceeds of the loan will also finance project implementation support, supervision of works and front-end fee.

The Project will be implemented by the Public Water Management Company Srbijavode (“Srbijavode”), the national body responsible for water management, including water use and protection from pollution. It is also responsible for management of risks associated with water bodies (such as flood risk). Srbijavode operates under the Water Management Directorate (WMD), which in turn is an administrative authority of the Ministry of Agriculture, Forestry and Water Management (MAFWM).

As this Project involves the greenfield development of a large dam, the EBRD has assigned it as a Category A project.

## 1.1 Project description

The Pambukovica proposals envisage development of a 27 m earth embankment dam (the Pambukovica dam) on the Ub River (about 21 km upstream of Ub settlement in Ub municipality) and an irrigation network within the Ub River Valley. The dam will be a multipurpose dam impounding a total reservoir volume of 8.15 Mm<sup>3</sup>. Its intended functions are:

- Flood protection,
- Irrigation of 2,225ha,
- Maintaining a guaranteed ecological flow in reservoir and downstream river,
- Retention of sediments.

Construction and preparation of technical documentation for Pambukovica dam is foreseen in two phases:

### Phase 1:

Construction of Pambukovica dam. For construction of the dam, and before impoundment, a 900m long section of the State Road No.21 will need to be raised above the maximum water level of the reservoir, and additional services located in the reservoir footprint relocated. Phase 1 will complete with the impoundment of the river and formation of the reservoir. Since the gap analysis was conducted, the dam design has been developed up to the “Project for the Building Permit” (PGD) stage, as defined by national legislation. Conceptual design of the road re-alignment is in progress.

### Phase 2:

Construction of an irrigation system within Ub Municipality is planned to begin in parallel with finalisation of Phase 1 works. Irrigation works will involve construction of the key facilities of the irrigation system distribution network which include pump stations, pressure pipelines and the tanks for daily balancing of the inflow. The rest of the distribution network infrastructure is planned to be developed to full capacity in the subsequent two years. Development of the secondary distribution network is planned concurrently with the primary distribution network.

A Feasibility study and associated Preliminary design of Irrigation system were completed in 2018. An Environmental Impact Assessment (EIA) for the irrigation system is not envisaged at this time.

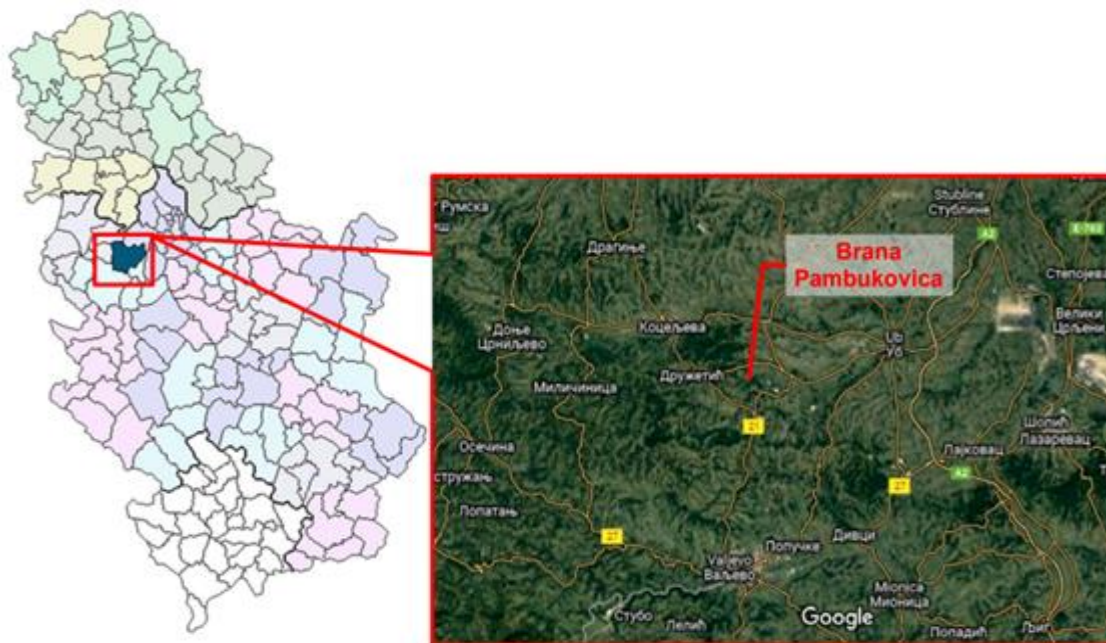
Although EBRD are not currently considering financing Phase 2, is it considered an inherent part of the delivery of the Project objectives, and constitutes an Associated Facility under the Environmental and Social



Policy 2019 (ESP). and thus should be considered appropriately in the Tasks, including as identified in the Terms of Reference (ToR).

### Project Location

Pambukovica Dam is envisaged to be on river Ub approximately 21 km upstream from the confluence to Tamnava River, which is 15km west from the settlement of Ub. Location of the Dam belongs to cadastral municipalities of Pambukovica, Radusa, Slatina and Gola Glava. Location of Pambukovica dam is shown in Figures 1 to 3 below.

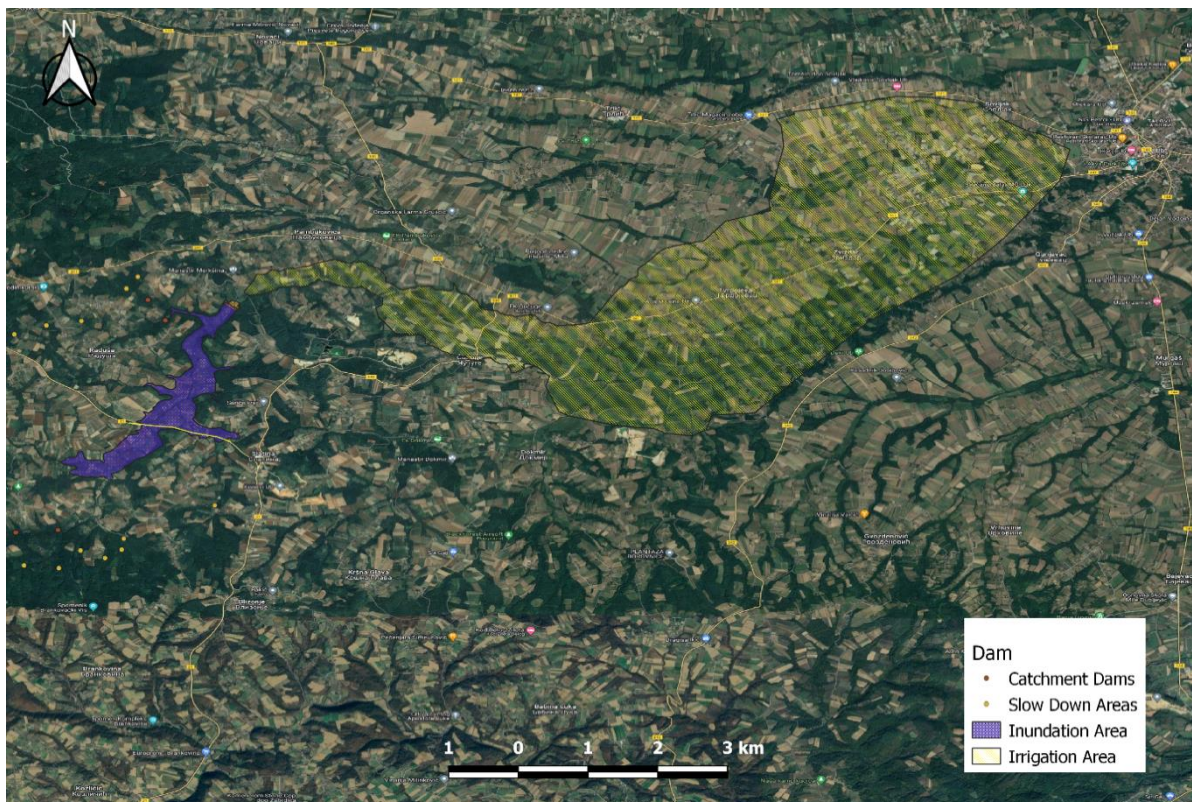


**Figure 1 Pambukovica Dam Location**



**Figure 2 Location of the Pambukovica Dam in the relation to location of settlements Gola Glava, Radusa and Pambukovica, and State Road No.21 (to be relocated / elevated)**





**Figure 3 Reservoir with irrigation area**



## 2. Objectives of the SEP

The Stakeholder Engagement Plan (SEP) has been developed specifically for this Project (ie Phase 1 as described above), delineating a comprehensive strategy for stakeholder consultation and engagement. It is designed to facilitate a systematic approach and formalize existing practices, aiding Srbijavode in continuing their good practice approach of cultivating and sustaining constructive relationships with the stakeholders both in this pre-construction stage of the Project and in the more active stages to come.

The main objectives of SEP are to:

- Ensure that adequate and timely information is provided to the Project Affected Persons (PAPs) or persons 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”) or that have influence over the Project. Provide to these groups such forums and opportunities to voice their concerns and opinions,
  - Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process.
  - Establish effective communication and cooperation facilitating community support in general, and
- Establish an effective grievance mechanism with the main goal to address concerns and issues in a timely fashion and minimize the number of cases referred to judicial authorities.

This SEP describes the approach to disclosing information and engaging with stakeholders, to be maintained throughout the Project cycle i.e. for, pre-construction including land acquisition, construction/rehabilitation activities and operation.

The table below identifies and summarizes the different stages of the project and status of the associated stakeholder engagement that guide this Project.

**Table 1 Project Stages**

Stage	Status (Planned/Completed)
Stage 1: Pre-construction Stage including design	Ongoing
Stage 2: Construction Stage	Planned
Stage 3: Operation	Planned

The implementation of the SEP is the primary responsibility of Srbijavode, although certain activities can be delegated to other parties, such as the local administration and the construction contractor. The SEP will undergo regular review and updates by Srbijavode .

### 3. Regulatory Requirements for Stakeholder Engagement

This Chapter provides an overview of the national and international laws and regulations relevant to the proposed project.

The selection of laws and regulations outlined in this Chapter and Appendix A.1 has been identified and listed based on the Project scale, nature, and the agreed-upon scope of the Project assessment.

#### 3.1 Legislation of the Republic of Serbia

Below is selection of main national legislation, which will be considered for this Assignment:

- Law on Environmental Impact Assessment.
- Law on Environmental Protection.
- Law on Planning and Construction.
- Law on Waters.
- Labour Law.
- Expropriation Law.
- Law on Nature Conservation.
- Law on Disaster Risk Reduction and Emergency Management.
- Law on Occupational Safety and Health.

Please note that the full list is included in Appendix A.1.

#### 3.2 EBRD Requirements

The ESP 2019 is the key document that guides the EBRD's commitment to promoting "environmentally sound and sustainable development" in the full range of its investment and technical cooperation activities. It sets out how Project Proponents are expected to implement this commitment in practice and on projects.

EBRD has adopted a comprehensive set of specific PRs for key areas of environmental and social sustainability that projects are required to meet. Central to the PRs is the application of the mitigation hierarchy and good international practice. As the Project will involve funding from EBRD, in addition to compliance with the Republic of Serbia's legal requirements, the Project will also need to meet the following specific PRs defined in EBRD's E&S Policy:

- PR1 - Assessment and Management of Environmental and Social Impacts and Issues;
- PR2 - Labor and Working conditions;
- PR3 - Resource Efficiency and Pollution Prevention and Control;
- PR4 – Health, Safety and Security;
- PR5 - Land Acquisition, Involuntary Resettlement and Economic Displacement;
- PR6 - Conservation and Sustainable Management of Living Natural Resources;
- PR8 - Cultural Heritage;
- PR10 - Information Disclosure and Stakeholder Engagement.

Performance Requirements 7 and 9 (Indigenes Peoples and Financial Intermediaries) are not considered relevant for this Project.

Specific requirements related to stakeholder engagement are defined under PR10 and are detailed further below.

### 3.3 Gaps Between National and EBRD Requirements

The national framework in Republic of Serbia is broadly compatible with the EBRD requirements of public consultation and stakeholder engagement but there remain gaps to be addressed. The national requirements stay at the level of procedural engagement and do not tackle in depth meaningful, effective and inclusive consultation. The requirement of an effective procedure or mechanism by which people can make comments or raise grievances beyond the formal administrative and judicial grievance forums is also a gap in the national framework comparing to the EBRD requirements.

Therefore, this SEP has taken into consideration all the requirements and has produced a plan that ensures alignment with both national laws and EBRD requirements .

**Table 2 Legal Gaps**

Topics	EBRD Performance Requirements	Requirements According to National Legislation	Identified Gaps	Measures to Address the Gaps
<b>Stakeholder Identification</b>	Requires identification and analysis of all potentially affected and interested parties, including vulnerable groups.	Focuses mainly on directly affected persons and legal landowners.	Narrow identification scope excludes indirectly affected or vulnerable people.	Conduct stakeholder mapping, including social baseline analysis, to ensure representation of all affected groups.
<b>Stakeholder Engagement Plan</b>	Requires preparation, implementation, and public disclosure of a project-specific SEP from early stages.	No legal obligation for a standalone SEP for infrastructure projects.  Limited requirements under EIA legislation for certain projects.	No specific requirements to develop and implements a SEP.	Develop and disclose a SEP aligned with PR10. Include methods, timeline, roles, and vulnerable group outreach.
<b>Information Disclosure</b>	Provide stakeholders with access to timely, relevant, understandable, accessible information in a culturally appropriate manner across diverse communication channels	The draft EIA/planning documents for project design in general is disclosed in hard copy in relevant municipal buildings and offices, as well as on government websites. An announcement on the availability of the EIA for review as well as the planned public hearing has to be made in a local newspaper in official languages in the project area,	The disclosure requirements are only related to EIAs. Disclosure may be limited to conventional channels; lacks proactive, inclusive multi-channel dissemination (e.g., web portals, radio, languages).	Translate and simplify key documents, use diverse formats, and ensure iterative disclosure aligned with project phases

Topics	EBRD Performance Requirements	Requirements According to National Legislation	Identified Gaps	Measures to Address the Gaps
		as well as through electronic media.		
<b>Meaningful Consultation</b>	Requires free, prior, informed and <b>meaningful</b> engagement throughout project cycle.	EIA law requires public consultations, but these are often one-off and focus on formal announcements.	Consultations are often procedural, not participatory or iterative.	Conduct early and ongoing consultations, use two-way dialogue, and document feedback and outcomes.
<b>Disclosure and Consultation on Category A projects</b>	For Category A projects, early and broad disclosure of ESIA and associated documents is required, including 120-day disclosure prior to Board approval.	No specific legal distinction made for disclosure based on project category	Serbian legislation does not provide for enhanced disclosure or extended consultation timelines for high-risk projects.	Follow EBRD timelines; publish draft ESIA, SEP, and other relevant docs at least 120 days prior to approval. Hold additional consultations.
<b>Stakeholder engagement activities throughout project cycle</b>	EBRD PR10 requires meaningful and inclusive stakeholder engagement throughout the project life cycle, including the collection of sex-, age-, and vulnerability-disaggregated data.	National legislation requires public disclosure and consultation for projects that may have significant environmental impacts.  These laws do not require engagement beyond approval or the collection of disaggregated data, nor do they mandate inclusion of vulnerable groups.	Limited provisions in national legislation for systematic and inclusive engagement, including lack of requirement for disaggregated data collection.	Ensure stakeholder engagement activities are designed to capture sex-disaggregated data and reflect gender-sensitive approaches. Record attendance by gender and include gender-focused questions in engagement instruments. Provide training to field teams on inclusive communication.
<b>Grievance Mechanisms</b>	Establish grievance mechanisms that are prompt, understandable, transparent, culturally sensitive, accessible, and free of charge, without retribution.	Formal administrative and judicial grievance forums without effective mechanisms for comments or grievances.	Absence of effective grievance mechanisms beyond formal forums. Legal grievance mechanisms are often slow and not adapted to informal or vulnerable complainants.	Develop and implement grievance mechanisms that are accessible, culturally appropriate, and free of charge, in line with EBRD PR10. Inform affected communities as part of the stakeholder engagement process.



## 4. Summary of Previous Stakeholder Engagement Activities

The stakeholder engagement to date has primarily involved public consultations. The first round was held prior to the publication of the Detailed Regulation Plan (DRP) for the Ub municipality. This consultation included members of the local communities as well as all interested stakeholders. Details regarding notification methods and specific discussion topics remain undisclosed. A second round of consultations was organized while the land acquisition process was underway in three Ub municipality communities. These consultations addressed community concerns regarding perceived delays in compensation payments. While no actual delays existed, the consultations were proactively initiated by Srbijavode to clarify the established timeline and answer questions. Participants included the director of the Sava-Danube Centre, with a list of additional undisclosed attendees. Local residents were invited by the presidents of the respective local communities.

In addition to these project-specific consultations, formal public participation was also ensured through the statutory procedures accompanying the preparation and adoption of planning documents relevant to the Pambukovica Dam project. These include the DRP for the area of the Ub municipality, the Spatial Plan of the Municipality of Ub, and the General Regulation Plan for the town of Ub. In accordance with national planning legislation, each of these documents underwent at least two rounds of public consultation—during the draft presentation and the subsequent public review—thereby providing stakeholders with official opportunities to be informed and to express their views.

For the DRP “Pambukovica Dam on the Ub River,” the decision on the preparation of the draft plan was published in the “Official Gazette of the Municipality of Ub,” No. 16/16. A technical review of the draft plan was conducted during a session of the Planning Commission held on October 27, 2016, which issued a positive opinion and forwarded the draft for public review. An official notice announcing the public review was published in the local newspaper “Napred” on November 3, 2016. The public review lasted from November 7 to December 7, 2016, and the public presentation of the draft plan was held on November 25, 2016.

Regarding the DRPs for the area of Valjevo, as well as the consultations related to the Spatial and General Regulation Plans, it is confirmed that these planning documents, as required by national legislation, also underwent formal public consultations during both the draft and public review phases. However, due to limited publicly available information and the inability of local municipal staff to access older records, the specific dates and content of these consultation sessions could not be verified during the preparation of this report.

Nonetheless, the structure and timeline of planning procedures defined by Serbian spatial planning legislation provide a reasonable basis to confirm that stakeholder engagement was embedded in the planning framework from an early stage, even where specific consultation records remain inaccessible.

A formal public participation process was ensured during the public consultations on the Environmental Impact Assessment (EIA) during the 20-day period, starting from November 26, 2019. An official notice announcing the public review was published on the Ministry of Environmental Protection’s website on November 25, 2019, and in the national newspaper “Večernje novosti”, on 28 November 2019, with the information on the availability of the documentation, duration of the public consultation process, date and venue of the public discussion and procedure for submitting complaints. The official announcement stated that the documentation will be made available online at the Ministry of Environmental Protection’s website, and that the printed versions will be made available at the Municipality of Ub and Municipality of Valjevo. Public discussion on the EIA was held on December 25, 2019 in the Municipality of Ub. However, no official records or documentation (e.g., participant lists or meeting minutes) are available to confirm the number of attendees or the issues raised by participants. According to information provided by Srbijavode, no comments were provided by any of the possible affected and/or interested parties (public bodies, organisations and general public). The EIA was approved by the technical commission of the Ministry of Environmental Protection on June 10, 2020, with the obligation to start the construction within the two-year period. Srbijavode is expected to initiate the EIA renewal procedure as a prerequisite to proceeding to the

Construction Stage of the Project. If construction does not commence within two years of receiving the EIA Study approval, the project developer is required to submit a formal request to the competent authority to proceed with the project. Upon review of this request, the authority may decide to either require a completely new EIA Study or request an update to the existing one. The request must include the same type of information that was initially required—such as project scope, potential impacts, and other relevant data. The renewal or update process then follows the same procedural steps as the original EIA, including determination of scope, preparation of documentation, public disclosure, and final approval.

## 4.1 Media search

The Consultant undertook a brief media search as a part of the preparation of this report. Table below summarises findings of the media search.

**Table 3 Media search results**

LINK	TITLE	DESCRIPTION	DATE
<a href="https://www.euronews.rs/srbija/drustvo/123684/denija-od-velikih-majskih-poplava-u-srbiji-postoji-li-strah-da-2014-godina-moze-da-se-ponovi-vest">https://www.euronews.rs/srbija/drustvo/123684/denija-od-velikih-majskih-poplava-u-srbiji-postoji-li-strah-da-2014-godina-moze-da-se-ponovi-vest</a>	A decade since the major May floods in Serbia – is there fear that 2014 could happen again? ( <i>“Decenija od velikih majskih poplava u Srbiji - postoji li strah da 2014. godina može da se ponovi?”</i> )	Pambukovica dam presented as a key element in preventing a repeat of the 2014 disaster in western Serbia.	17 May 2024
<a href="https://www.rts.rs/lat/vesti/drustvo/5440068/puzovic-poplava-u-obrenovcu-bila-je-kao-uragan-pete-kategorije.html">https://www.rts.rs/lat/vesti/drustvo/5440068/puzovic-poplava-u-obrenovcu-bila-je-kao-uragan-pete-kategorije.html</a>	Puzović: The flood in Obrenovac was like a Category 5 hurricane ( <i>Puzović: Poplava u Obrenovcu bila je kao uragan pete kategorije?</i> )	Director of Srbijavode announces the start of the construction works on the Pambukovica dam as an answer to the destruction caused by the 2014 floods.	15 May 2024
<a href="https://www.regionalne.rs/vesti/uskoro-izgradnja-brane-i-visenamenske-akumulacije-pambukovica?">https://www.regionalne.rs/vesti/uskoro-izgradnja-brane-i-visenamenske-akumulacije-pambukovica?</a>	Construction of the Pambukovica dam and multipurpose reservoir to begin soon. ( <i>“Uskoro izgradnja brane i višenamenske akumulacije Pambukovica ”</i> )	<p>The construction of the Pambukovica dam and multipurpose reservoir is planned on the Ub River, spanning parts of Valjevo and the Municipality of Ub. The Serbian Government has approved land expropriation for the project.</p> <p>The project is based on the Detailed Regulation Plan covering 130 ha in Ub and 33 ha in Valjevo. The conceptual design was developed by Energoprojekt – Hidroinženjering.</p> <p>The dam aims to regulate river flow, prevent floods, and support irrigation of about 1,970 ha of land. The reservoir can be emptied within 1–2 days in case of high water levels.</p> <p>Planned works include new and upgraded roads, utility infrastructure, and a transformer station near the dam site.</p>	3 September 2022
<a href="https://valjevonadlanu.rs/2022/09/02/uskoro-izgradnja-brane-i-visenamenske-akumulacije-pambukovica-na-delu-teritorije-valjeva-i-opštine-ub/">https://valjevonadlanu.rs/2022/09/02/uskoro-izgradnja-brane-i-visenamenske-akumulacije-pambukovica-na-delu-teritorije-valjeva-i-opštine-ub/</a>	Construction of the Pambukovica Dam and multipurpose reservoir is soon to begin in the area of Valjevo and the municipality of Ub ( <i>“Uskoro izgradnja brane i višenamenske akumulacije Pambukovica na delu teritorije Valjeva i opštine Ub”</i> )	The article describes the dam in terms of the area it will cover and the amount of land that will be irrigated. It states that the reservoir will be used for irrigation and improving small water supplies. It also mentions the construction of access roads as part of the project and the building of a transformer station.	2 September 2022

LINK	TITLE	DESCRIPTION	DATE
<a href="https://www.ekapija.com/news/3826480/where-to-invest/infrastructure/start-up/index">https://www.ekapija.com/news/3826480/where-to-invest/infrastructure/start-up/index</a>	A Step Closer to the Construction of the Pambukovica Dam and Multipurpose Reservoir in the Area of Valjevo and the Municipality of Ub <i>("Korak bliže izgradnji brane i višenamenske akumulacije Pambukovica na delu teritorije Valjeva i opštine Ub")</i>	This article discusses the planned construction of the "Pambukovica" dam and multipurpose reservoir on the River Ub, spanning parts of the city of Valjevo and the municipality of Ub. The Serbian government has approved the expropriation of land for this project, which relies on a Detailed Regulation Plan covering 130.26 hectares in the Ub municipality and an additional 33.09 hectares in Valjevo. The reservoir will regulate the flow of the Ub River, protect settlements from floods, and enable irrigation of approximately 1,970 hectares of land. The project includes the construction of transportation and communal infrastructure, including a new access road and a transformer station to power the dam.	1 September 2022
<a href="https://patak.co.rs/predstavljeno-projekat-brane-pambukovica/">https://patak.co.rs/predstavljeno-projekat-brane-pambukovica/</a>	The 'Pambukovica' Dam Project Presented <i>("Predstavljen projekat brane "Pambukovica"")</i>	The article provides basic information about the project in terms of the dam's length, height, and surface area.	1 February 2021
<a href="https://www.politika.rs/scc/clanak/471863/Brana-za-zastitu-i-navodnjavanje-Tamnave">https://www.politika.rs/scc/clanak/471863/Brana-za-zastitu-i-navodnjavanje-Tamnave</a>	Dam for flood protection and irrigation of Tamnava <i>("Брана за заштиту и наводњавање Тамнаве")</i>	The article describes the dam in terms of the area it will cover and the amount of land to be irrigated. It mentions the investor and potential financiers, including the Abu Dhabi Fund and the EBRD. It also notes the completion of the conceptual project and the submission of the expropriation project.	29 January 2021
<a href="https://www.ekapija.com/en/news/2999363/construction-of-pambukovica-dam-to-begin-in-spring-2021">https://www.ekapija.com/en/news/2999363/construction-of-pambukovica-dam-to-begin-in-spring-2021</a>	Construction of Pambukovica dam to begin in Spring 2021 <i>("Na proleće kreće izgradnja brane Pambukovica")</i>	The article specifies the project's value and the amount of land that will be expropriated.	7 September 2020
<a href="https://www.kolubarske.rs/sr/vesti/okrug/9962/">https://www.kolubarske.rs/sr/vesti/okrug/9962/</a>	Construction of the 'Pambukovica' Dam Will Begin in the Spring <i>("Na proleće kreće izgradnja brane "pambukovica")</i>	This article provides information on construction of the multipurpose "Pambukovica" dam on the Ub River is expected to begin in the spring of next year, with a planned completion in three years.  The dam will serve to protect against floods, irrigate agricultural land, and enhance tourism potential, with a total project value of 35 million euros. An artificial lake will be created for camping, fishing, and recreation, and the dam will also include a distribution water network to assist households with water supply issues.	4 September 2020
<a href="https://www.kolubarske.rs/sr/vesti/okrug/4847/">https://www.kolubarske.rs/sr/vesti/okrug/4847/</a>	Dam 'Pambukovica' on the Ub River <i>("Brana „Pambukovica“ na reci Ub")</i>	The article focuses on Darko Glišić's statement about the project's significance.  It provides basic information about the dam, including the volume of the reservoir, the dam's area, and width. It also mentions the strategic environmental impact assessment, and the funds for its development are	20 July 2016

LINK	TITLE	DESCRIPTION	DATE
		secured in the budget of the municipality of Ub.	

The articles collectively detail the Pambukovica Dam project on the Ub River, covering its scope, purpose, and development stages. They outline the dam's coverage area and its role in irrigation, flood protection, and water supply enhancement. Key aspects include the expropriation of land, construction of infrastructure such as access roads and a transformer station, and the project's estimated value of 35 million euros. They state that the dam will create an artificial lake for recreation and include a distribution network for improved household water supply. The strategic environmental impact assessment is noted, and the Abu Dhabi Fund and the EBRD are mentioned as potential financiers. The construction was announced to begin in the spring of next year with a projected completion time of three years.

Overall, the impression of the project in the media is positive, highlighting its potential benefits for flood management, irrigation, and local development. The common thread across all articles is the emphasis on the dam's significant impact on local infrastructure, environmental management, and community well-being.

## 4.2 Ongoing stakeholder engagement within the scope of ESIA

As part of the ongoing ESIA development, the Consultant has actively engaged stakeholders. On November 19, 2024, a meeting was held with Srbijavode officials to discuss the land acquisition process, receiving a comprehensive briefing on its status since September 2020.

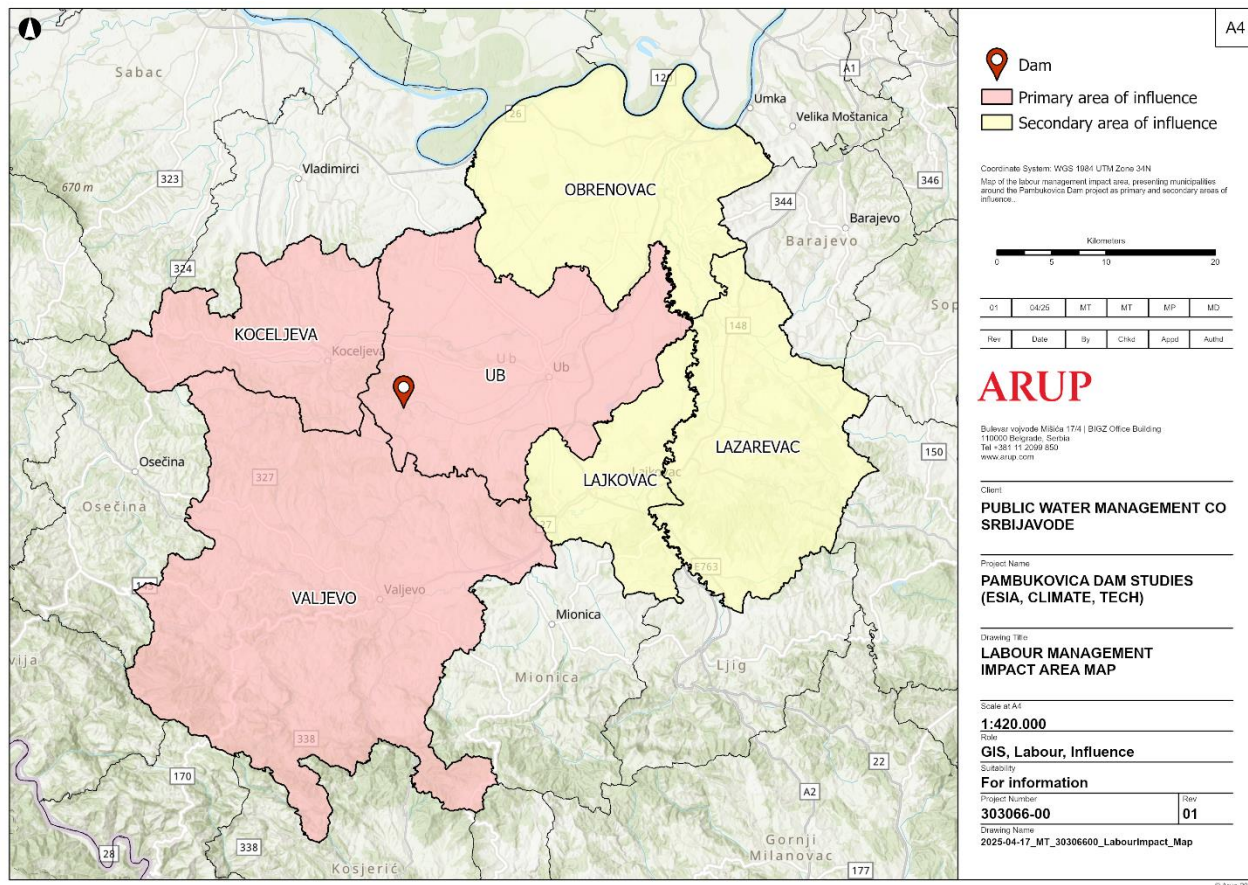
Furthermore, the Consultant also engaged with legal and land rights departments in the municipalities of Valjevo (November 28, 2024), and Ub (November 29, 2024). These meetings served to inform local administrative stakeholders of the Consultant's role in the ESIA preparation and to gather information about the current state of land acquisition. The Consultant also received contact information for PAPs whose land was acquired, enabling it to conduct follow-up interviews.

During the first two weeks of December 2024, structured interviews for a socio-economic survey were conducted with a sample of the PAPs, the results of which are presented in the socio-economic baseline of the ESIA. The surveys were carried out on December 4, 6, 10, and 11, 2024. The total sample size of the survey is 84 people – 34 persons directly impacted by the Project (expropriation of land and property) and another 50 from the impacted communities. The survey focussed on the cadastre municipalities within the Project Area of Influence– directly impacted CMs Pambukovica, Radusa, Slatina and Gola Glava, as well as neighbouring cadastre municipalities, particularly those in the area downstream of the dam (potentially impacted by the Phase 2 – Irrigation system). During the survey, PAPs were questioned about how much they were informed and their attitudes towards the project as well as on their familiarity with the chain of responsibility and with the grievance mechanism of the Project. Feedback gathered from interviews has been systematically documented and analysed to understand the concerns and suggestions of the local population. Detailed assessment is presented in the Historic Land Acquisition Report. (Corrective Action Plan).

Additional surveys with PAPs will be conducted during the period of public disclosure for the ESIA, with sensitivity to the identification of PAPs who might be adversely impacted by the project due to their vulnerabilities. The overall target of the additional survey sample is 60 people (20% of all PAPs), excluding the PAPs who have already been surveyed. This would ensure the total size of the survey to approximately 30% of all PAPs (current estimated number of PAPs is 307). In addition, discussions in focus groups will be held following public consultations to further explore concerns, gather qualitative insights, and ensure that the voices of potentially vulnerable groups—such as elderly, women-headed households, persons with disabilities, and ethnic minorities—are adequately represented in the impact assessment and mitigation planning.

The area of influence with regard to stakeholder engagement includes the municipalities directly impacted by the Project – Ub, Valjevo and Koceljeva, as well as neighbouring municipalities Obrenovac, Lajkovac and Lazarevac. These are the municipalities that would benefit from active and meaningful consultation regarding the Project development and implementation.





**Figure 4 Area of Influence – stakeholder engagement**

# 5. Identification of Stakeholders and Communication Methods

In preparation for the development of the Pambukovica Dam, it is necessary to identify key stakeholders to better understand and address potential social risks and impacts of the project. Effective identification and engagement of these stakeholders is essential for fostering social acceptance, addressing concerns, and promoting sustainable development in the Cities of Valjevo and Ub.

As of the writing of this report, the Consultant has been provided with some information on stakeholder engagement conducted to date. Thus, a list of potential stakeholders has been compiled through various methods including information provided by the client, site visits, and desktop research.

In the process of stakeholder identification, the Consultant has considered the potential impacts on these stakeholders as well as the power, influence and interests of various stakeholder groups. This assessment encompasses those stakeholders who can impact the project and those who will be affected by it. Stakeholder influence is evaluated based on their connections to individuals, institutions, communities, and organizations capable of affecting project implementation through factors such as reputation, finances, logistics, labour, and material supply. Stakeholder power is determined by their direct ability to mobilize resources and communities that could impact project implementation. Stakeholder interest is gauged by the extent to which communities are affected by the project in terms of livelihoods, prospects for local living and employment, and overall quality of life due to changes in the environment and economic conditions resulting from the project.

The stakeholder list may evolve throughout project implementation. It shall therefore be regularly reviewed and updated throughout the project cycle. The risks associated with each stakeholder group may also change and should be periodically reassessed. As a minimum, the Stakeholder list should be revised prior to take-over by the Project of the expropriated land parcels, at the start of the construction stage and at the start of the operation stage.

Below is a table delineating potential stakeholders categorized by type and evaluated based on their level of influence, power, and interest in the project, rated as Low, Moderate, or High. The table will be subject to change and updates based on additional data gathering and socio-economic survey activities as well as feedback obtained during the public disclosure and consultation of the ESIA.

**Table 4 Identified Stakeholders**

Stakeholder category	Specific Stakeholders and groups	Type of Impact/influence	Level of Influence, Power, and Interest
<b>I. Direct Stakeholders (Directly and significantly impacted by project outcomes.)</b>			
<b>Local Communities and workers</b>	<ul style="list-style-type: none"> <li>Affected Landowners (formal/informal),</li> <li>Residents in Floodplain Areas,</li> <li>Residents Dependent on Ub River,</li> <li>Farmers &amp; Agricultural Cooperatives</li> <li>Vulnerable groups (women, Roma community)</li> <li>Dam Construction Workers (local, migrant/foreign)</li> </ul>	<ul style="list-style-type: none"> <li>Land loss,</li> <li>Flood risk changes,</li> <li>Altered livelihoods,</li> <li>Employment opportunities</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> <li>High Interest</li> <li>Low Power</li> </ul>
<b>Ub and Valjevo Local governments</b>	<ul style="list-style-type: none"> <li>Urban Planning &amp; Zoning Departments,</li> <li>Department for Communal Infrastructure,</li> <li>Department for Local Traffic and Traffic Security</li> <li>Local Emergency Services,</li> <li>Department for Community Relations</li> </ul>	<ul style="list-style-type: none"> <li>Project approval,</li> <li>Infrastructure management,</li> <li>Disaster response,</li> <li>Safety Management,</li> <li>Public communication</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> <li>Moderate Power</li> <li>High Interest</li> </ul>
<b>Srbijavode</b>	<ul style="list-style-type: none"> <li>Project development teams,</li> </ul>	<ul style="list-style-type: none"> <li>Project implementation,</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> </ul>

Stakeholder category	Specific Stakeholders and groups	Type of Impact/influence	Level of Influence, Power, and Interest
	<ul style="list-style-type: none"> <li>Infrastructure management teams,</li> <li>Public communication teams,</li> <li>Legal teams for the conduct of Expropriation</li> </ul>	<ul style="list-style-type: none"> <li>Water management,</li> <li>Safety and risk mitigation</li> </ul>	<ul style="list-style-type: none"> <li>High Power,</li> <li>High Interest</li> </ul>
<b>II. Indirect Stakeholders (Indirectly impacted; potential for significant influence on project outcomes.)</b>			
<b>National level Ministries</b>	<ul style="list-style-type: none"> <li>Ministry of Finance,</li> <li>Ministry of Agriculture, Forestry and Water,</li> <li>Ministry of Environmental Protection,</li> <li>Ministry of Construction and Transport,</li> <li>Ministry of Internal Affairs</li> </ul>	<ul style="list-style-type: none"> <li>Funding,</li> <li>Regulation,</li> <li>Permitting,</li> <li>Infrastructure,</li> <li>Safety and security</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> <li>High Power</li> <li>High Interest</li> </ul>
<b>EBRD</b>	<ul style="list-style-type: none"> <li>Project Financing teams,</li> <li>Environmental &amp; Social Standards Oversight teams,</li> <li>Financial Oversight teams</li> </ul>	<ul style="list-style-type: none"> <li>Funding,</li> <li>Compliance control,</li> <li>Oversight</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> <li>High Power</li> <li>High Interest</li> </ul>
<b>Downstream Water Users</b>	<ul style="list-style-type: none"> <li>Communities, businesses relying on Ub River downstream</li> </ul>	<ul style="list-style-type: none"> <li>Altered river flow,</li> <li>Water quality,</li> <li>Flood risk</li> <li>Loss of income</li> <li>Loss of Crop yields</li> </ul>	<ul style="list-style-type: none"> <li>Moderate Influence</li> <li>Low Power</li> <li>High Interest</li> </ul>



Stakeholder category	Specific Stakeholders and groups	Type of Impact/influence	Level of Influence, Power, and Interest
<b>Environmental and other local NGOs</b>	<ul style="list-style-type: none"> <li>Local and national civil society organizations, including those focused on environmental protection, human rights, social inclusion, community development, etc.</li> </ul>	<ul style="list-style-type: none"> <li>Monitoring,</li> <li>Advocacy,</li> <li>Public pressure</li> </ul>	<ul style="list-style-type: none"> <li>Moderate Influence</li> <li>Low Power</li> <li>High Interest</li> </ul>
<b>Contractors &amp; Subcontractors</b>	<ul style="list-style-type: none"> <li>Construction companies,</li> <li>Equipment suppliers,</li> <li>Specialized engineering firms</li> </ul>	<ul style="list-style-type: none"> <li>Project implementation,</li> <li>Employment</li> <li>Disruption of daily lives of local communities</li> </ul>	<ul style="list-style-type: none"> <li>High Influence</li> <li>High Power</li> <li>Moderate Interest</li> </ul>
<b>III. Stakeholders with Potential Influence (Not directly impacted; potential to significantly influence project success or failure.)</b>			
<b>Media Outlets</b>	<ul style="list-style-type: none"> <li>Local and national news organizations</li> </ul>	<ul style="list-style-type: none"> <li>Public opinion,</li> <li>Advocacy,</li> <li>Spreading of Information/misinformation/disinformation</li> </ul>	<ul style="list-style-type: none"> <li>Moderate Influence</li> <li>Low Power</li> <li>High Interest</li> </ul>
<b>Regional Planning Bodies</b>	<ul style="list-style-type: none"> <li>River basin management authorities</li> <li>Administrative districts</li> </ul>	<ul style="list-style-type: none"> <li>Regional water management,</li> <li>Integration of project into broader water resource plans,</li> <li>Integration of the project into the wider local, regional and national economies</li> </ul>	<ul style="list-style-type: none"> <li>Moderate Influence</li> <li>Moderate Power</li> <li>Moderate Interest</li> </ul>

## 6. Stakeholder Engagement Plan

### 6.1 Overview of Activities

Future information disclosure and consultation activities will be aligned with the progress of development and implementation of the Project. In addition to the formal stakeholder engagement process related to the designs and assessment of the project, the Consultant and Public Water Management Company Srbijavode will conduct additional stakeholder consultation to ensure a more transparent and inclusive engagement process.

Public Water Management Company Srbijavode will implement a grievance process and form provided in section 8 of this SEP with contact details for submitting grievances. This will also be available on their website. The process, form and the contact information will also be published on the websites of the Municipalities Ub and Valjevo. Hard copies of the form and a poster with process and contact information will be made available at the local notice boards at each cadastre municipality.

The pre-construction stage focuses on establishing transparent communication with affected communities and key stakeholders. This includes a socio-economic impact assessment and public consultations with landowners, farmers, businesses, and local authorities to discuss concerns and potential project impacts. Information about the project will be shared through public notice boards, official correspondence, websites, and local media, ensuring that all stakeholders have access to relevant updates.

As part of the Environmental and Social Impact Assessment (ESIA) process, a formal public disclosure and consultation process has been initiated in line with national legislation and EBRD requirements. The objective of this process is to present the draft ESIA findings (including the identified environmental and social impacts as well as proposed mitigation measures) to project communities and stakeholders, and to actively seek their feedback. The period of public disclosure (120 days) also serves to ensure transparency, enhance the quality of the ESIA, and support informed decision-making. Following the conclusion of the disclosure period, the ESIA will be finalized, incorporating relevant feedback received from stakeholders. A summary of comments received and corresponding responses will be included to demonstrate how the input influenced the final version of the ESIA.

During the immediately prior to and during the construction stage, engagement will focus on keeping stakeholders informed about forthcoming and ongoing activities and mitigating disruptions. Affected communities, businesses, and public authorities will receive timely notifications about road closures, water supply interruptions, and construction schedules through mass media, official correspondence, and municipal noticeboards. Additionally, information about local employment opportunities will be shared with affected communities to support local access to economic opportunities during the construction period. Special efforts will be made to reach vulnerable groups through direct outreach and tailored communication methods, ensuring their sustained participation in the engagement process.

In the operation stage, stakeholder engagement will continue to ensure a smooth transition from construction to full project implementation. Responsibilities for project maintenance and management will be formally transferred from contractors to the Srbijavode, with clear communication to the public about any ongoing operational impacts. Road users, businesses, and affected communities will be kept informed of potential disruptions, such as traffic changes or infrastructure maintenance. Stakeholder information will be regularly updated, and public feedback mechanisms will remain in place to address any concerns that arise during operation.

## 6.2 Pre-Construction Stage Including the Adoption of the Design and Economic Resettlement Process

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
1.	Establish transparent communication with local communities and implement measures for community engagement and addressing local concerns.	All stakeholders	Initiated before ESIA disclosure and continued throughout project preparation.	Srbijavode	Local community notice boards, official correspondence, Srbijavode website, and distribution of Public Grievance Forms.	Enquiries and comments via Srbijavode website and direct correspondence.	Grievance log, notifications on notice boards and website.
2.	Consultation with community representatives on potential livelihood impacts, agriculture, local investments, and stakeholder perspectives on alternative irrigation options.	PAPs, community representatives, municipal officials (affected cadastre municipalities (CM Gola Glava in Municipality Valjevo, CM Pambukovica, CM Radusa and CM Slatina in Municipality Ub), and agriculture associations	During disclosure period.	Consultant and Srbijavode	Focus groups, public consultations, targeted interviews	Stakeholder input during discussions.	Meeting notes and participant lists.
3.	Individual meetings with each Municipality representative to discuss strategic development, related projects, etc.	Municipal officials (Valjevo – CM Gola Glava; Ub – CM Pambukovica, Radusa, Slatina)	Before ESIA disclosure.	Consultant and Srbijavode	Individual meetings	Feedback during meetings	Records of meetings and documentation of conversations
4.	Public disclosure of the EIA (resubmission of EIA as the original EIA approval has expired) and related documents for 40 days with public discussion (per national law), if necessary	All stakeholders	Preferably during the ESIA disclosure	Srbijavode	National or local newspapers, Ministry of Environmental Protection website, Municipality of Ub website, Municipality of Valjevo website, Local community centers' offices or bulletin boards (Valjevo – CM Gola Glava; Ub – CM Pambukovica, Radusa, Slatina)	Stakeholder input during public disclosure and public discussion.	Official public disclosure Report by the Ministry of Environmental Protection

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
5.	Translation, printing, and public disclosure of the Draft ESIA and related documents for 120 days (per EBRD requirements)	All stakeholders	Once ESIA draft approved by Srbijavode and EBRD. Immediately upon approval of ESIA draft, 120-day disclosure period begins.	Consultant and Srbijavode	Srbijavode website, hardcopies available in local community offices, leaflets, media (print & radio)	Enquires and comments via Srbijavode website <a href="https://www.srbijavode.rs/">https://www.srbijavode.rs/</a> or through written submissions, calls and visits to designated personnel	Notification as announced on local community notice boards, Public Water Management Company Srbijavode website and the media  Comments log
6.	Consultations with vulnerable groups (focus group discussions, separate meetings, etc.).	Stakeholders from vulnerable and underrepresented groups.	During 120-day disclosure period.	Consultant and Srbijavode	In addition to communication tools described above, vulnerable groups will receive house visits and/ or invitation to individual or small group meetings as agreed with the specific group/ individuals. Assistance will be provided in transportation to and from the venues, if requested. Simplified easy understandable brochures, print-out of salient features of documents, using non-technical language will be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language by a	In addition to channels defined above, communication will be made available through direct phone lines and follow up agreed visits/meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns. Vulnerable PAPs will also have an opportunity to provide feedback during the additional survey.	Notification as announced on local community notice boards, Srbijavode website and the media.  Comments log



No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
					knowledgeable person if needed		
7.	Organize public consultations throughout the ESIA development stage if there is interest and attendance at organised events	All stakeholders	During 120-day disclosure period	Consultant and Srbijavode	Public disclosure of documentation on Srbijavode website.  Notification through local media, advertising disclosure of documents  Notification through local media announcing the time and place for the public consultation meeting	Opportunity for all stakeholders to voice their concerns and provide input.	Records of meeting held
8.	Organise follow-up surveys of the affected PAPs during the public consultation meetings	PAPs	During the first 60 days of the ESIA disclosure period	Consultant and Srbijavode	Survey of PAPs using the previously established questionnaire	Broaden the sample of the PAPs to ensure that any specific impacts on individual PAPs are captured.	Survey questionnaires; Statistical presentation of the findings included in the final findings  Updated SIA, HLACAP and SEP
9.	Organise focus group discussions (FGD) during the public consultation meetings	PAPs and local community	During the first 60 days of the ESIA disclosure period	Consultant and Srbijavode	Discussions with PAPs using questionnaire to be developed for focus groups discussions	Broaden the sample of the PAPs to ensure that any specific impacts on individual PAPs are captured.	FGD questionnaires; Statistical presentation of the findings included in the final findings  Updated SIA, HLACAP and SEP
10.	Organise follow-up surveys with targeted PAPs throughout the public disclosure period	PAPs who were significantly impacted (large areas of land,	During the first 60 days of the ESIA disclosure period	Consultant and Srbijavode	Survey of PAPs using the previously established questionnaire	Broaden the sample of the PAPs to ensure that any specific impacts on individual PAPs are captured.	Survey questionnaires; Statistical presentation of the findings included in the final findings  Updated SIA, HLACAP and SEP

## 6.3 Construction

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
11.	Disseminate information about anticipated construction activities to affected stakeholders.	Affected communities, PAPs (e.g. business owners, vulnerable groups etc.), general public.	At least starting from 30 days prior to construction.	Consultant and Srbijavode	Srbijavode website, official correspondence, local media and noticeboards, project leaflets	Via grievance mechanism, contractor's technical coordinator.	Notifications as published in affected municipalities and websites Press clippings Written correspondence with relevant authorities and organisations.
12.	Keep stakeholders informed of any project or construction-related activities that might affect them. Timely notification of the closure of the State Road IB no.21 (e.g. notify stakeholders of water supply interruptions, road closures and diversions and any transport disruptions, construction schedule)	PAPs, affected communities, Public and private sector enterprises affected by the Project footprint etc., Relevant local / regional / national authorities, General public	Monthly from start of works, and as needed	Contractor, Consultant and Srbijavode	Srbijavode website Official correspondence, mass media, local noticeboards and premises of municipalities	Grievance mechanism (email, phone), direct comment during updates Via information boxes to be installed at construction site As envisaged by national law	Notifications as published in affected municipalities and their websites. Press clippings Written correspondence with relevant authorities and organisations.
13.	Keep stakeholders informed about local employment opportunities	PAPs, affected communities, public and private sector enterprises affected by the Project footprint etc., relevant local/regional/national authorities, General public	After contract signing, during mobilisation, and as needed.	Contractor, Local Employment office	Contractor's website, Srbijavode site, municipal bulletin boards, official letters	Via Technical Coordinator Via Contractors website	Notifications as published in affected municipalities and websites
14.	Notify PAPs on vacating their land plots and assets to allow them with opportunity to collect harvest. If	PAPs whose land plots have been expropriated	At least 60 days before construction works for plots with	Contractor, Consultant and Srbijavode	Official correspondence, local media and	Via Technical Coordinator	Notifications as published in affected

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
	possible, consider minor revisions to the works schedule to allow PAPs to complete harvesting.		structures, and at least 30 days before works for plots with crops and productive perennial plants, on in line with respective provisions of Entitlement matrix.		noticeboards, project leaflets, phone calls to PAPs and meetings with PAPs	Via Contractors website Via grievance mechanism or meetings	municipalities and their websites. Press clippings Written correspondence with relevant authorities and organisations. Minutes of meetings, calls log
15.	Disclose information on project Environmental and Social construction performance.	PAPs, General Public	Semi-annually	Contractor	Contractor's website	Via contact details listed on site and during public updates	Notifications as published on website, performance summaries
16.	Tailored engagement for vulnerable groups/individuals, including house visits, small group meetings, and personalized support for communication needs	Vulnerable groups/ individuals	Periodically during the implementation of works	Consultant and Srbijavode, with assistance of external specialists as needed (e.g., sign language specialist, gender specialist).	In addition to communication tools described in bullets above, vulnerable groups will receive house visits and / or invitation to individual or small group meetings as agreed with the specific group / individuals. Assistance will be provided in transportation to and from the venues. Illiterate or partially literate persons will have documents read out loud in presence of	In addition to opportunities listed in bullets above, communication will be made available through direct phone lines and follow up agreed visits / meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	As assigned to under each respective bullet

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
					an entrusted third person and sign language knowledgeable person if needed will be present for hearing impaired persons		
17.	Contractor to provide safety notices and maps of alternative roads and detour routes.	All road users and community	Prior to and during works	Contractor and Srbijavode	Road signs, printed maps at noticeboards, traffic info via local radio and TV	Feedback via grievance or meetings	Photo documentation, map distribution logs
18.	Reinforce grievance mechanism through all construction stages, maintain updated grievance log.	All	Continuous	Contractor, Consultant, and Srbijavode	Same as above.	Grievance forms at site, online, in person	Grievance log, resolution database. Monthly updates to grievance log summary available on website

## 6.4 Operation

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
19.	Disseminate information about transition of responsibilities and liabilities from Contractor(s) to operator.	Affected communities, PAPs, General public.	Starting at least 2 months before end of construction.	Srbijavode	Contractors grievance mechanism Srbijavode website, official correspondence, local media, local noticeboards and premises of municipalities.	Contractors grievance and Srbijavode website	Copies of public notices, media clippings, correspondence logs, grievance records

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
20.	Notify stakeholders of operational activities that may affect daily life (e.g. road closures, traffic congestion)	Road users, relevant local /regional/ national authorities, General public	From commencement of operation stage and ongoing	Road management authority	Local media. Road signs Road authority website	As per national law and public information channels	Notification logs, photo documentation
21.	Keep updating stakeholders on maintenance plans, operations, or emergency events	Affected communities	Periodically	Srbijavode and road operator	Website updates, public notifications	Via online portal or community meetings	Info dissemination logs
22.	Update and maintain stakeholder contact database and communication records	Road users, PAPs, affected communities, public and private sector enterprises affected by the Project footprint etc., relevant local/ regional/ national authorities, General public	From commencement of operational stage	Contractor	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Public Water Management Company Srbijavode website	Feedback via official channels, in line with national law	Updated stakeholder database, correspondence records, feedback summaries
23.	Ensure continued accessibility of grievance mechanism during operation stage	General public	From operation start	Srbijavode	Website, physical forms in local offices	Open submission of grievances	Grievance log, resolution outcomes



## 7. Implementation of Stakeholder Engagement Activities

### 7.1 Roles and Responsibilities

PWMC Srbijavode, the Contractor, and the Consultant will take part in ensuring implementation of the Stakeholder Engagement Plan and Grievance Mechanism. In particular:

- The implementation of the Stakeholder Engagement Plan is the responsibility of PWMC Srbijavode, which will appoint a Stakeholder Engagement and Grievance Manager and a Social Manager. The Stakeholder Engagement and Grievance Manager will coordinate SEP implementation, maintain updated stakeholder mapping, monitor potential community issues, oversee grievance resolution, and ensure engagement activities are documented. In addition, Stakeholder Engagement and Grievance Manager will also coordinate and manage implementation of Grievance Mechanism. The activities of Stakeholder Engagement and Grievance Manager will be coordinated by Social Manager of PWMC Srbijavode.
- The Contractor's team will include a Community Liaison Officer and a Social Manager. The Community Liaison Officer will act as the main point of contact for communities, manage day-to-day information flow, organise public consultations, and maintain the grievance register to ensure timely responses. The Social Manager will oversee all social performance aspects of the project, including labour management, livelihood support, stakeholder engagement, and coordination of compensation and assistance programs.
- The Supervision Consultant will verify that grievances recorded by the Community Liaison Officer are addressed appropriately and report on grievance trends and engagement performance to the PWMC Srbijavode on regular basis.

### 7.2 Recordkeeping

- All stakeholder activities must be properly recorded.
- Public announcements – date of announcement, content, outlets (newspapers, flyers, radio or TV stations websites, etc.)
- Public meetings – invitations (how and when were the meetings announced), content, list of attendees, comments or remarks noted, photographs
- Individual meetings - invitations (how and when was the meeting arranged), content, list of attendees, comments or remarks noted, photographs
- Surveys – filled in survey forms
- Official correspondence with authorities
- Grievance Log Register (GLR) – to include date the grievance was received, name of grievant (or anonymous), content of the grievance, location, assigned responsibility, measures taken to resolve the grievance, date of resolution (time taken to resolve the grievance), communication with the grievant.

It should be noted that all personal data collected will be handled in accordance with applicable data protection regulations. Participation in engagement activities is voluntary, and any personal information (e.g., names, contact details) will be used solely for project-related communication, and will not be shared beyond the project team without prior consent. Photographs, particularly close-up images of individuals, will only be used with their permission, in line with good ethical practice and data protection principles. In the meantime, sex-disaggregated data will be used for project-related analysis.

### 7.3 Monitoring and Evaluation

The outcomes of stakeholder engagement will be monitored through the following Key Performance Indicators (KPI):

- SEP is up to date and Project information is available for the public to comment.
- Actions listed in the Stakeholder Engagement and Information Disclosure Programme of the SEP are implemented as scheduled.
- The minutes of consultation meetings are recorded, and meetings logged in a register.
- Grievances are logged and tracked through to resolution within a timeframe of 14 calendar days from acknowledgement of receipt (evidenced by an up-to-date GLR).
- Semi-annual Grievance Report to be prepared and made publicly available
- Contractors and subcontractors' contracts include clauses obliging them to adopt SEP requirements, as appropriate.
- Contractors progress reports include summary of the grievance mechanism (summary of new grievances recorded and update on the resolution of existing grievances)
- Annual reports on the implementation of the SEP and grievance process are made available as part of annual external reporting on the E&S performance of the Project which shall be made publicly available.

## 8. Public Grievance Mechanism

### Overview:

The Pambukovica Dam project incorporates a robust Grievance Redress Mechanism (GRM) designed to ensure that concerns and complaints related to the project's environmental and social impacts are addressed fairly and efficiently. A project-specific grievance mechanism will be developed in compliance with national legislation governing grievance panels.

### Submitting grievances:

Individuals or organizations may submit comments and/or complaints in person, by phone, via post, or email using the contact details provided further in this section of this document (Figure 5, Example of a Grievance Form). While individuals may provide their name and contact details in the grievance form, this is not mandatory, and grievances may be submitted anonymously. However, stakeholders need to be made aware that anonymous grievances cannot be responded to individually. Grievances related to the project will be collected during the pre-construction, construction, and operational stages.

#### Contact Details for Inquiries and Grievances:

Organization: PWMC Srbijavode  
Name : Tamara Vuckovic  
Lena Marinovic  
Address: Bulevar umetnosti 2A, Beograd 11070  
Phone : +381 11 3119 400; +381 11 3119 402  
E-mail : office@srbijavode.rs  
URL : <https://www.srbijavode.rs>

Contact information for responsible personnel will be updated as needed to ensure stakeholders always have access to the appropriate point of contact.

### Recording and acknowledging grievances

All grievances should be categorized and recorded in the GLR. The GLR will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the register with the following information:

- description of grievance,
- date of receipt / acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures), and
- date of resolution and closure / provision of feedback to the complainant.

The reception of grievance should be formally acknowledged through a personal meeting, phone call, email or letter as appropriate within 3 working days from submission. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant at this time. The person/organization that submitted the grievance should be provided with contact information of the person responsible for its resolution and the estimated time for completion.

### Assisting complainants:

If the grievance is vague and not clear enough, the complainant will be assisted in formulating/redrafting the submission, in order for the grievance to become clearer and to support an informed decision and grievance resolution.

GRIEVANCE FORM		
1. Reference No:	_____	
2. Date of grievance submission	_____	
3. Anonymous grievance	<input type="radio"/> Please check if you wish to remain anonymous, then continue from item 6. <i>Please note that anonymous grievances cannot be responded individually.</i>	
4. Full Name of Complainant	_____ (Note, your name and contact information are not mandatory. If you wish to remain anonymous, by law you have every right to do so, and your anonymity will be respected)	
5. Contact Information of Complainant  Please chose how you wish to be contacted (mail, telephone, e-mail).	<input type="radio"/> By Post: Please provide mailing address: _____ _____ <input type="radio"/> By Telephone: _____ <input type="radio"/> By E-mail: _____	
6. Description of Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?  _____   _____   _____	
7. Date of Incident/Grievance	_____	
8. Please chose the option that describes your situation the best	<input type="radio"/> One-time incident/grievance (date: _____) <input type="radio"/> Happened more than once (how many times: _____)  <input type="radio"/> Check if the issue is on-going (currently experiencing problem)	
9. What would you like to see happen to resolve the problem?	_____	
_____		

**Figure 5 Grievance Form Example**

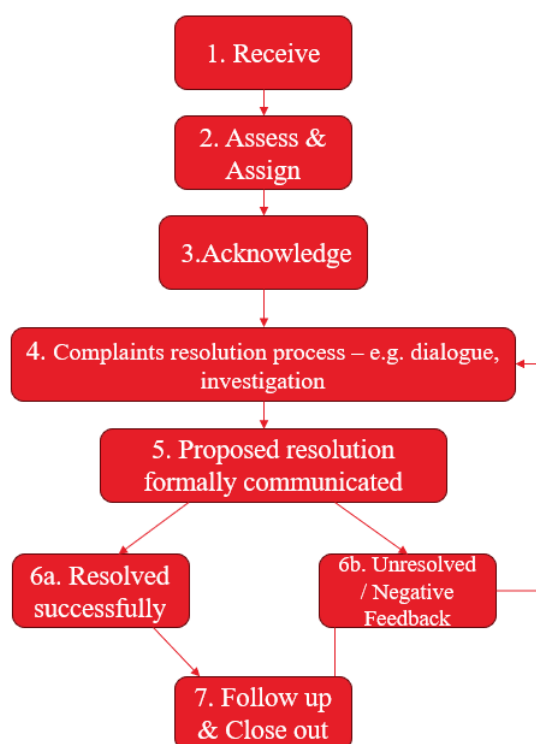
### Grievance resolution:

All reasonable efforts to address the complaint will be made upon its receipt and acknowledgement. If any grievance cannot be addressed or if action is not required, a detailed explanation / justification will be provided to the complainant on why the issue was not addressed. The response will also contain an

explanation on how the person / organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

For complex grievances a conflict resolution committee can also be established (to include top management, other departments, external consultants). All grievances will be responded to within 30 working days from submission. In case of delay, complainants will be notified about the reasons for the delay and the expected timing for when their grievance will be addressed. The proposed resolution should be confirmed with the complainant before implementation to minimise unnecessary/unwarranted actions. If they agree with the approach required actions are implemented to deal with the issue. Completion of actions is recorded in the GLR. The response is signed off by the appropriate manager. This includes either signing off the GLR or confirming in official correspondence (which will then be filed with the grievance to indicate agreement and referenced in the register).

Following the implemented actions, it should be confirmed with the complainant that they are satisfied with the outcomes. Any further response from the complainant should be assessed in order to determine whether the grievance is closed or whether further action is required. If they are unsatisfied with the proposed action or with the outcome, the complaint should be reviewed once again. The grievance resolution process is presented in the Figure 4 below.



**Figure 6 Grievance Resolving Process**

### **Resolution through legal system**

At all times, complainants are also able to seek legal remedies in accordance with local laws and regulations. In Serbia, public grievances can be submitted through several official channels. Citizens may file complaints with local municipal offices, relevant line ministries, or the national Ombudsman (Protector of Citizens), an independent institution tasked with protecting citizens' rights and overseeing public administration.

### **EBRD's Independent Project Accountability Mechanism**

The EBRD's Independent Project Accountability Mechanism (IPAM) is the institution's accountability framework that enables individuals or communities who believe they may be adversely affected by a project financed by the Bank to raise concerns. IPAM offers an impartial and transparent process through which



grievances can be submitted, assessed, and addressed. It operates independently from project management and investigates compliance with the EBRD's Environmental and Social Policy. The mechanism provides three key functions: problem-solving, compliance review, and advisory services, ensuring that affected parties have access to remedy and that lessons are integrated into future operations

# Appendix A

## Applicable Legislation

## A.1 Applicable Legislation

Laws
Law on Strategic Environmental Impact Assessment (Official Gazette of RS, no. 94/2024)
Law on Environmental Impact Assessment (Official Gazette of RS, No. 94/2024)
Law on Environmental Protection ("Official Gazette of the RS", no. 135/2004, 36/2009, 36/, 72/2009, 43/2011, 14/2016, 76/2018, 95 /2018, 95/2018 and 94/2024)
Law on Planning and Construction (Official Gazette of RS, no. 72/2009, 81/2009, 64/2010, 24/2011, 121/2012, 42/2013, 50/2013, 98/2013, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019, 9/2020, 52/2021 and 62/2023)
Law on Nature Protection ("Official Gazette of RS ", br. 36/2009, 88/2010, 91/2010, 14/2016, 95/2018 and 71/2021).
Law on Nature Conservation ("Official Gazette of RS", no. 36/2009, 88/2010, 91/2010 - amended, 14/2016, 95/2018 - other laws and 71/2021.)
Law on Forests ("Official Gazette of RS", No. 30/10, 93/12, 89/15 and 95/18)
Law on Air Protection ("Official Gazette of RS", No. 36/09,10/13 and 26/2021)
Law on Environmental Noise Protection ("Official Gazette of RS", No. 36/09,88/10 and 96/2021)
Law on Soil Protection ("Official Gazette of RS", 112/15)
Law on Waste Management ("Official Gazette of RS", No. 36/09, 88/10, 14/16,95/18 and 35/2023)
Law on Packaging and Packaging Waste ("Official Gazette of RS", No. 36/09 and 95/18)
Law on Explosive Substances, Flammable Liquids and Gases ("Official Gazette of the SRS", No. 44/77, 45/85 and 18/89 and "Official Gazette of he RS", No. 53/93, 67/93, 48/94, 101/05 and 54/15)
Law on Waters (Official Gazette of the RS, No. 31/2019)
Law on the Spatial Plan of the RS from 2010 to 2020 ("Official Gazette of the RS", No. 88/10)
Law on Cultural Heritage ("Official Gazette of the RS", 71/94, 52/11 and 99/11)
Law on Occupational Safety and Health ("Official Gazette of RS", No. 101/05, 91/15,113/17 and 35/2023)
Labour Law (Official Gazette of the RS No. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017, 113/2017, 95/2018)
Law on Amicable Resolution of Labour Disputes (Official Gazette of the RS No. 125/2004, 104/2009, 50/2018)
Law on Socio-economic Council (Official Gazette of the RS No. 125/2004)
Law on the Prevention of Harassment at Work (Official Gazette of the RS No. 36/10)
Law on Strikes (Official Gazette of the FRY No. 29/96 and of RS No. 101/2005, 103/2012)
Law on Employment and Unemployment Insurance (Official Gazette of the RS No. 36/2009, 88/2010, 38/2015, 113/2017 and 49/2021)
Pension and Disability Insurance Law (Official Gazette of the RS No. 34/2003, 64/2004, 84/2004, 85/2005, 101/2005, 63/2006, 05/2009, 107/2009, 101/2010, 93/2012, 62/2013, 108/2013, 75/2014, 142/2014, 73/2018, 46/2019, 86/2019, 62/2021, 125/2022, 138/2022, 76/2023 and 94/2024)
Law on Preventing Discrimination Against Persons with Disabilities (Official Gazette of the RS No. 33/2006, 13/2016)
Anti-discrimination Law (Official Gazette of the RS, No. 22/2009)

Law on Gender Equality (Official Gazette of the RS No. 104/2009)
Expropriation Law (Official Gazette of the RS, No. 53/95, 16/2001, 20/2009, 55/2013, 106/2016)
Law on General Administrative Procedure (Official Gazette of the RS No. 18/2016, 95/2018)
Law of Contracts and Torts (Official Gazette of the RS, No. 29/78, 38/85, 45/89, 57/89, 31/93, 1/2003, 18/2020)
Law on Agricultural Land (Official Gazette of the RS, No. 62/2006, 65/2008, 41/2009, 112/2015, 80/2017 and 95/2018)
Law on Public Information and the Media (Official Gazette of the RS, No. 92/2023 and 51/2025)
Law on Energy ("Official Gazette of RS", no. 145/2014, 95/2018, 40/2021, 35/2023, 62/2023 and 94/2024)
Law on the Fundamentals of Property Relations ("Official Journal of the SFRY" No 6/80, 36/90, FRY No. 29/96 and RS No. 115/05)
Law on Plant Health ("Official Gazette of RS", No. 41/09 and 17/19)
Law on Territorial Organization (Official Gazette of RS No. 129/2007, 18/2016, 47/2018 and 9/2020)
Law on Local Self Government (Official Gazette of RS, No. 129/2007 83/2014, 101/2016, 47/2018 and 111/2021)
Law on Free Access to Information of Public Importance (Official Gazette of the RS, No. 120/2004, 54/2007, 36/2010 and 105/2021)"
Law on Disaster Risk Reduction and Emergency Management ("Official Gazette of RS", No. 87/18)
Law on Fire Protection ("Official Gazette of RS", No. 111/09, 20/15, 87/18, and 87/18)
Law on Chemicals ("Official Gazette of RS", No. 36/09, 88/10, 92/11, 93/12, and 25/15)
Law on Obligatory Social Insurance Contributions (Official Gazette of the RS No. 84/2004, 61/2005, 62/2006, 5/2009, 52/2011, 101/2011, 7/2012, 8/2013, 47/2013, 108/2013, 6/2014, 57/2014, 68/2014, 5/2015, 5/2016, 7/2017, 113/2017, 7/2018, 95/2018, 4/2019, 86/2019, 5/2020, 153/2020, 6/2021., 44/2021, 118/2021, 10/2022, 138/2022, 6/2023, 92/2023, 6/2024, 94/2024 and 8/2025)
Law on the Planning System of the Republic of Serbia ("Official Gazette of RS, No. 30/2018")
Ordinance on capital projects ("Official Gazette of RS", No. 79/2023)
<b>Directives</b>
SEA Directive – Strategic Environmental Assessment (Directive 2001/42/EC)
<b>EIA Directive – Environmental Impact Assessment (Directive 2014/52/EU)</b>
Water Framework Directive 2000/60/EC
Waste Framework Directive 2008/98/EC
Directive relating to the assessment and management of environmental noise (Directive 2002/49/EC)
Conservation of natural habitats and of wild fauna and flora (Habitat Directive 92/43 EEC)
Framework Directive on Safety and Health at Work (Directive 89/391 EEC)
Directive 2006/54/EC on equal treatment of men and women in occupational social security schemes
Directive 2000/43/EC against discrimination on grounds of race and ethnic origin
Directive 2000/78/EC against discrimination at work on grounds of religion or belief, disability, age or sexual orientation
Directive 2004/113/EC on equal treatment between men and women in the access to and supply of good and services
Proposal for a Directive of the European Parliament on Corporate

Sustainability Due Diligence and amending Directive (EU) 2019/1937
Directive for road safety management (EC 2019/1936, amendment of EC 2008/96)
Directive 2009/147/EC on the conservation of wild birds
Floods Directive (2007/60/EC)
<b>International Standards and Guidelines</b>
European Bank for Reconstruction and Development Environmental and Social Policy 2019
International Commission on Large Dams (ICOLD) Guidelines
Environmental and Social Performance Standards (World Bank, 2018)
International Finance Corporation (IFC) Performance Standards (2012)
The Espoo Convention
IFC Good Practice Handbook 'Environmental Flows for Hydropower Projects: Guidance for the Private Sector in Emerging Markets' (2018)
Canadian Dam Association Guidelines for Public Safety Around Dams (2011)
EBRD Green Economy Transition Technical Guide (2022)
EBRD Paris Agreement alignment methodology
Guidance on climate risk assessment from EUFIWACC, JASPERS and industry-led best practice guidance including the International Hydropower Association
<b>Other relevant regulation</b>
Regulation on Determining the List of Projects for Which an Environmental Impact Assessment is Mandatory and the List of Projects for Which an Environmental Impact Assessment May be Required ("Official Gazette of RS", No. 114/08);
Regulation on Emission Limit Values for Pollutants in Waters and Deadlines for Achieving Them ("Official Gazette of RS", No. 67/11, 48/12, and 1/16);
Regulation on Limit Values for Pollutants in Surface and Ground Waters and Sediments and Deadlines for Achieving Them ("Official Gazette of RS", No. 50/12)
Regulation on Limit Values for Priority and Priority Hazardous Substances Polluting Surface Waters and Deadlines for Achieving Them ("Official Gazette of RS", No. 24/14);
Regulation on Water Classification ("Official Gazette of SFRY", No. 5/68);
Regulation on Classification of Watercourses ("Official Gazette of SFRY", No. 5/68)
Regulation on Noise Indicators, Limit Values, Methods for Assessing Noise Indicators, Disturbance, and Harmful Effects of Noise in the Environment ("Official Gazette of RS", No. 75/10);
Regulation on Limit Values for Pollutants, Harmful, and Dangerous Substances in Soil ("Official Gazette of RS", No. 30/18 and 64/19);
Regulation on Systematic Monitoring of Soil Condition and Quality ("Official Gazette of RS", No. 73/19);
Regulation on Air Quality Monitoring Conditions and Requirements ("Official Gazette of RS", No. 11/10, 75/10, and 63/13);
Regulation on Products that Become Special Waste Streams After Use, the Form for Daily Records of Quantity and Type of Produced and Imported Products and Annual Report, Method and Deadlines for Submitting Annual Reports, Payment Obligations, Calculation Criteria, Amount, and Method of Calculation and Payment of Fees ("Official Gazette of RS", No. 54/10, 86/11, 15/12, 41/13, 3/14, 81/2014, 31/2015, 44/2016, 43/2017, 45/2018, 67/2018, and 95/2018);



Regulation on Classification of Facilities, Activities, and Land into Fire Risk Categories ("Official Gazette of RS", No. 76/10);
Regulation on Control of Use and Trade of Wild Flora and Fauna ("Official Gazette of RS", No. 31/05, 45/05, 22/07, 38/08, 9/10, 69/11, and 95/18 law);
Regulation on Ecological Network ("Official Gazette of RS", No. 102/10);
Regulation on Protection Regimes ("Official Gazette of RS", No. 31/12);
Regulation on Determining Locations for Meteorological and Hydrological Stations of State Networks and Protection Zones Around These Stations, as well as Types of Restrictions That Can Be Imposed in Protection Zones ("Official Gazette of RS", No. 34/13);
Regulation (EU) 2020/852 (Taxonomy) on the establishment of a framework to facilitate sustainable investment including date of entry into force and its implementing and delegated acts;
Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents ("Official Gazette of RS", No. 20/2025)
The Rulebook on the content, method and procedure for the development of spatial and urban plans ("Official Gazette of RS", no. 32/2019 and 47/2025)
Rulebook on the Content of the Environmental Impact Assessment Study ("Official Gazette of RS", No. 69/05);
Rulebook on the Type and Quantity of Hazardous Substances Based on Which the Accident Prevention Plan is Prepared ("Official Gazette of RS", No. 34/19);
Rulebook on the Content of the Accident Prevention Policy and the Content and Methodology for Preparing the Safety Report and Accident Prevention Plan ("Official Gazette of RS", No. 41/10)
Rulebook on the Content of Information on Hazards, Measures, and Procedures in Case of Accidents ("Official Gazette of RS", No. 18/12)
Rulebook on Machine Safety ("Official Gazette of RS", No. 58/16)
Rulebook on Technical and Other Requirements for Liquid Fuels of Petroleum Origin ("Official Gazette of RS", No. 111/15, 106/16, 60/17, 117/17, 120/17, 50/18, 101/18, and 93/19)
Rulebook on Technical Norms for Fire Protection of Industrial Facilities (Official Gazette of RS", No. 1/18)
Rulebook on Technical Norms for Fire Hydrant Network Installations (Official Gazette of RS", No. 3/18)
Rulebook on Preventive Measures for Safe and Healthy Work with Work Equipment ("Official Gazette of RS", No. 23/09, 123/12, 102/15, and 101/18)
Rulebook on Technical Norms for Low Voltage Electrical Installations ("Official Gazette of SFRJ", No. 53/88 and 54/88, and "Official Gazette of SRJ", No. 28/95)
Rulebook on Technical Norms for Protection of Facilities from Atmospheric Discharges ("Official Gazette of SRJ", No. 11/96)
Rulebook on the Method and Conditions for Measuring and Testing the Quality of Wastewater and the Content of Measurement Reports ("Official Gazette of RS", No. 33/16)
Rulebook on Reference Conditions for Types of Surface Waters ("Official Gazette of RS", No. 67/11)
Rulebook on Parameters of Ecological and Chemical Status of Surface Waters and Parameters of Chemical and Quantitative Status of Groundwater ("Official Gazette of RS", No. 74/11)
Rulebook on Hazardous Substances in Waters ("Official Gazette of SFRJ", No. 31/82)
Rulebook on Hazardous Substances that Must Not be Discharged into Waters ("Official Gazette of SFRJ", No. 3/66 and 7/66)

Rulebook on the Hygienic Safety of Drinking Water ("Official Gazette of SRJ", No. 42/98 and 44/99, and "Official Gazette of RS", No. 28/19)
Rulebook on Permissible Quantities of Hazardous and Harmful Substances in Soil and Irrigation Water and Methods for Their Testing ("Official Gazette of RS", No. 23/94)
Rulebook on Methods for Measuring Noise, Content, and Scope of Noise Measurement Reports ("Official Gazette of RS", No. 72/10)
Rulebook on Exposure Limits to Non-Ionizing Radiation ("Official Gazette of RS", No. 104/09)
Rulebook on the List of Electrical and Electronic Products, Measures for Prohibition and Restrictions on the Use of Electrical and Electronic Equipment Containing Hazardous Substances, and the Method and Procedure for Managing Waste from Electrical and Electronic Products ("Official Gazette of RS", No. 99/10)
Rulebook on Categories, Testing, and Classification of Waste ("Official Gazette of RS", No. 56/10 and 93/19)
Rulebook on Storage, Packaging, and Labelling of Hazardous Waste ("Official Gazette of RS", No. 92/10)
Rulebook on the Form of the Waste Movement Document and Instructions for Its Completion ("Official Gazette of RS", No. 114/13)
Rulebook on the Form of the Hazardous Waste Movement Document, the Form for Prior Notification, Its Submission Method, and Instructions for Filling Them Out ("Official Gazette of RS", No. 17/17)
Rulebook on the Form for Daily Records and Annual Reports on Waste with Instructions for Completing Them ("Official Gazette of RS", No. 7/20)
Rulebook on the Form for Requesting a Permit for Treatment, Storage, Reuse, and Disposal of Waste ("Official Gazette of RS", No. 38/18)
Rulebook on Conditions and Methods for Collection, Transport, Storage, and Treatment of Waste Used as Secondary Raw Material or for Energy Recovery ("Official Gazette of RS", No. 98/10)
Rulebook on Conditions, Methods, and Procedures for Managing Waste Oils ("Official Gazette of RS", No. 71/10)
Rulebook on Criteria for Identifying Habitat Types, Types of Habitats, Sensitive, Endangered, Rare, and Priority Habitats for Protection and Measures for Their Preservation ("Official Gazette of RS", No. 35/10)
Rulebook on the Declaration and Protection of Strictly Protected and Protected Wild Species of Plants, Animals, and Fungi ("Official Gazette of RS", No. 5/10, 47/11, 32/16, and 98/16)
Rulebook on Lists of Harmful Organisms and Lists of Plants, Plant Products, and Prescribed Facilities ("Official Gazette of RS", No. 7/10, 22/12, and 57/15)
Rulebook on Criteria for Assessment and Procedure for Categorizing Protected Areas ("Official Gazette of RS", No. 97/15)
Rulebook on the Application of Hydrological Measurement and Observation Methods ("Official Gazette of RS", No. 20/13)
Rulebook on Conditions for Establishing Supplementary Networks of Meteorological and Hydrological Stations ("Official Gazette of RS", No. 30/14);
Strategy for Biodiversity of the Republic of Serbia for the Period 2011-2018 ("Official Gazette of RS", No. 13/11)
Waste Management Strategy for the Period 2010-2019 ("Official Gazette of RS", No. 29/10);
Detailed Regulation Plan for "Pambukovica Dam on the River Ub" ("Official Gazette of the Municipality of Ub", No. 30/16)

Detailed Regulation Plan for the Dam and Multipurpose Accumulation "Pambukovica" on the River Ub in the Territory of the City of Valjevo for the Area of K.O. Gola Glava ("Official Gazette of the City of Valjevo", No. 4/17)

Spatial Plan of the Municipality of Ub ("Official Gazette of the Municipality of Ub", No. 13/12)

**Regional spatial plan for Kolubara and Mačva administrative zone ("Official Gazette of RS", No.11/2015)**