

**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

## Social Impact Assessment

Reference: 2025/11

Final | 12 August 2025



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# Abbreviations

Abbreviation	Full name
CM	Cadastral Municipality
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESP	Environmental and Social Policy
PAP	Project Affected Person
PGD	Building Permit Design Stage (Projekat za gradjevinsku dozvolu)
PR	Performance requirement
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference

# 1. Socio economic assessment of the affected communities

## 1.1 Project Background

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”). The Project will be implemented by the Public Water Management Company Srbijavode (“Srbijavode”), the national body responsible for water management. As this Project involves the greenfield development of a large dam, the EBRD has assigned it as a Category A project.

Feasibility Study 2018 for the Pambukovica dam with a reservoir on the Ub river was developed by "Energoprojekt-Hidroinženjering", Belgrade in December 2020. It elaborated technical solutions for the dam and accompanying structures and defined the estimated investment value required for project realization. Further, the Conceptual Design has been revised in 2020 for the Pambukovica dam by "Energoprojekt-Hidroinženjering", Belgrade. This design analysed the proposed dam profile and defined its parameters and those of the future reservoir. The Design for the Construction Permit has been developed by "Energoprojekt-Hidroinženjering" in 2023, and was approved by the State's Revision Committee (Technical Expert Control) in October 2023.

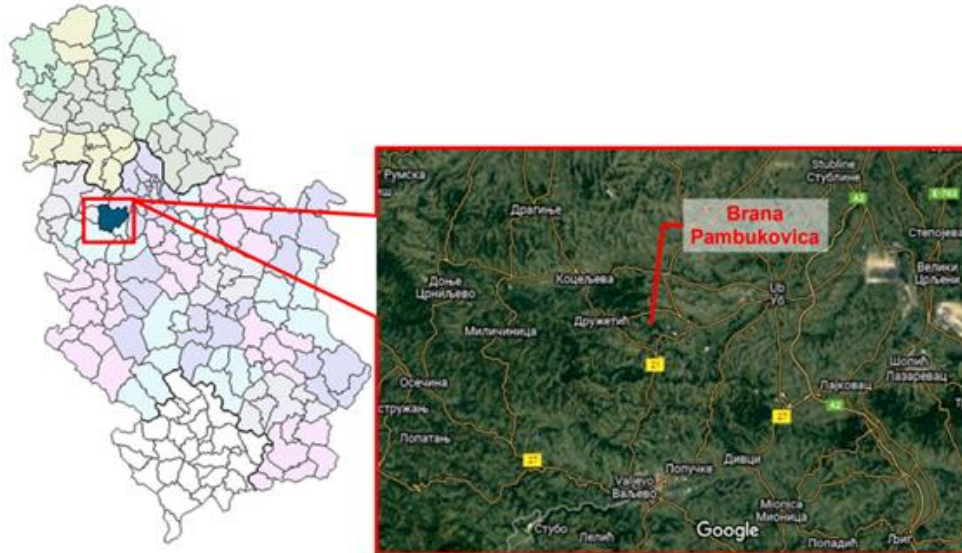
Design developed by Energoprojekt envisages development of a 27.5 m high earth embankment dam, the Pambukovica dam, on the Ub River and an irrigation network within the Ub River Valley. Its intended functions include flood protection, irrigation of approximately 2,225 hectares, maintenance of a guaranteed ecological flow in the reservoir and downstream, and retention of sediments. Estimated time needed for construction of the dam is two to three years, considering the amount of work and defining the dynamics of execution of work. Assumed lifetime of the dam is 80 years.

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

- Phase 1 - Construction and operation of Pambukovica dam for flood defence purposes. 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.
- Phase 2 - Construction and operation of an irrigation system within Ub Municipality is now planned to begin in parallel with finalisation of Phase 1 works. This phase involves the dam and reservoir operating for both flood defence and irrigation purposes. Irrigation construction works will involve construction of the key facilities of the irrigation system primary 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 years.

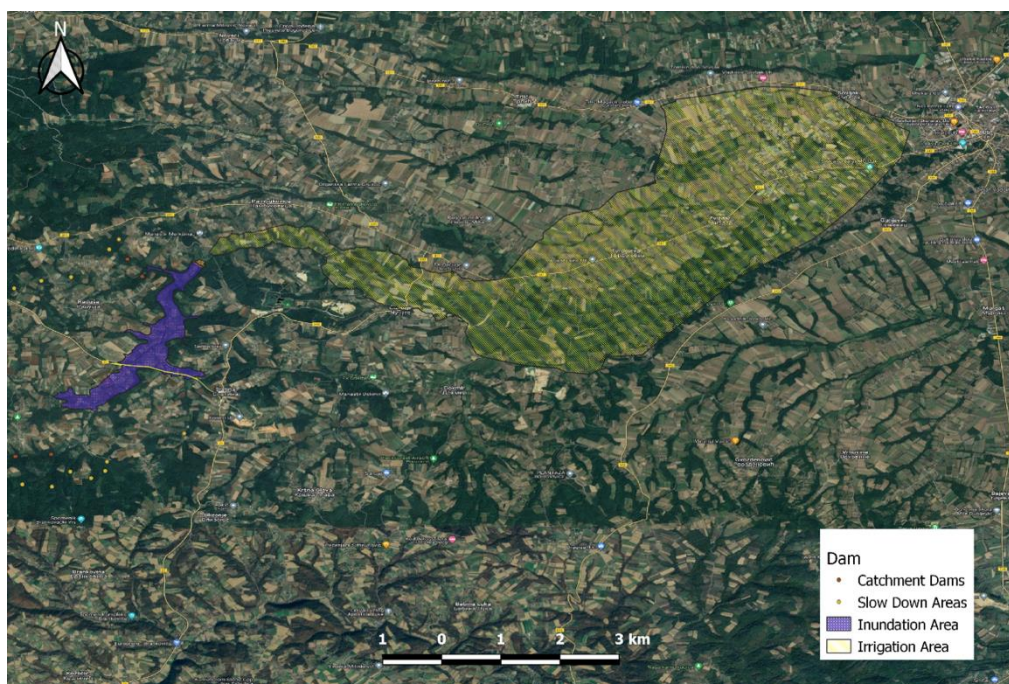


Pambukovica is a village located in western Serbia, within the municipality of Ub, which is part of the Kolubara District. (see Figure 1). It lies approximately 80 kilometers southwest of Belgrade, the capital of Serbia. The area is primarily rural and agricultural, with nearby towns including Ub, Valjevo, and Lajkovac.



**Figure 1 - Project location in relation to Serbia, and the Kolubara region**

Pambukovica Dam is envisaged to be on river Ub approximately 21km upstream from the confluence to Tamnava River, which is 15 km west from the settlement of Ub. Location of the Dam belongs to cadastral municipalities of Pambukovica, Radusa and Gola Glava. Figure 2 demonstrates the total project area (Phases 1 and 2), and Figure 3 presents the location of the dam and reservoir in relation to nearby settlements and State Road No. 21 (Phase 1).



**Figure 2 - Total Project area, including the irrigation network (Phases 1 and 2)**





**Figure 3 - Location of the dam and the reservoirs in relation to the nearby settlements and the state road no 21 (to be relocated / elevated)**

The typical landscape in the project area is presented in Figure 4.



**Figure 4 - The characteristic landscape of the Project area**

According to the data available at the time of preparation of this report, the overall area of the Project spans 2,674,664 m<sup>2</sup> across 578 land parcels which are being expropriated. Of these, 2,230,024 m<sup>2</sup> are located within the Municipality of Ub, specifically the cadastral municipalities (CM) of Pambukovica, Raduša, and Slatina. The other 444,640 m<sup>2</sup> of land targeted for acquisition are within the CM Gola Glava, which falls administratively under the jurisdiction of the City of Valjevo.

The number of PAPs directly affected by land acquisition is currently estimated at 307 at this stage of the expropriation process. This number may change by the end of the process, as further confirmations of ownership are completed.

## 1.2 Receptors and Area of Influence

Area of influence from the perspective of social impacts includes the villages directly affected by land acquisition, as well as neighbouring villages potentially impacted by traffic disruptions and increased demand for agricultural land. This AoI is focusing on Phase 1 of the Project, and it is expected that social impacts for Phase 2 are localized, impacts will not potentially expand to whole village / neighbouring villages.

All of the identified cadastre municipalities included within the area of influence rely on one of the following roads for most of their daily needs.

- Road 21, from Koceljeva, through Slatina and on to Valjevo
- Road 340, from Slatina through Čučuge and on to Stubline and Obrenovac
- Road 341, from Pambukovica to Ub

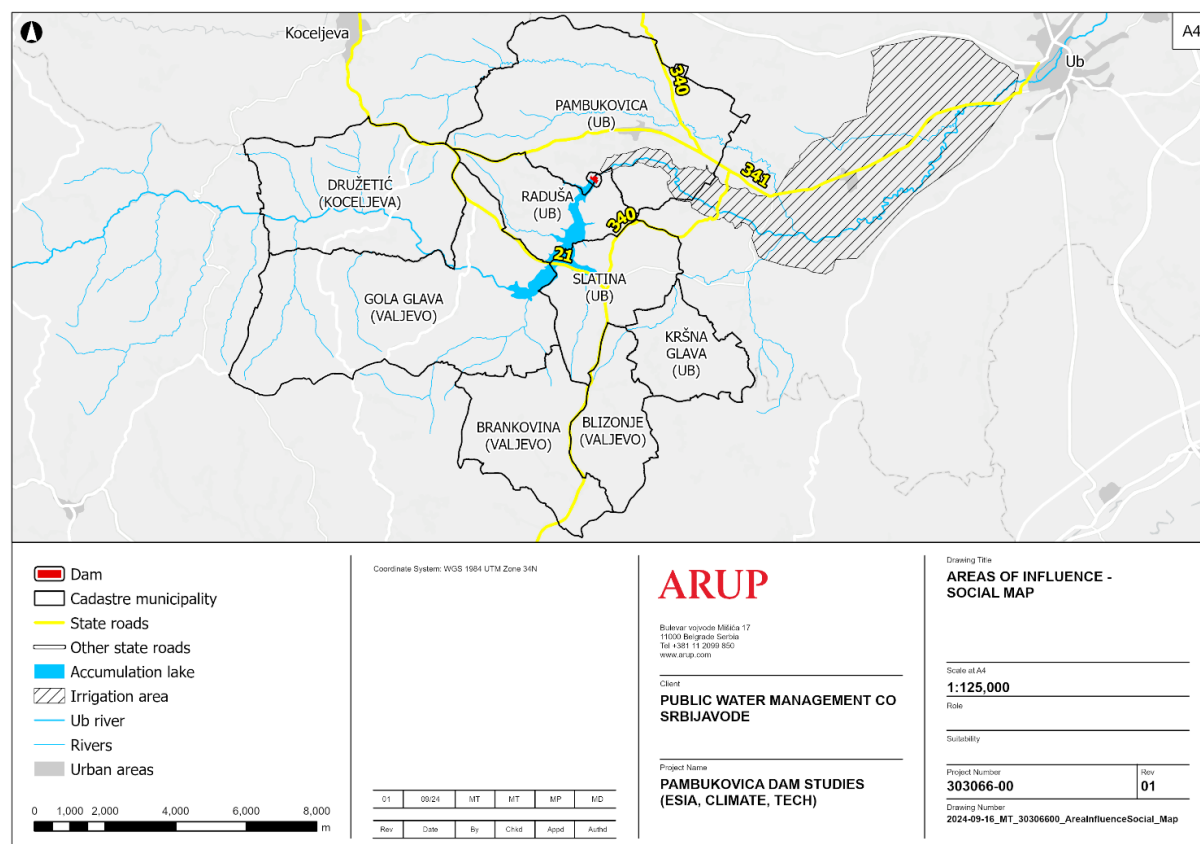


Figure 5 - Area of Influence for social impacts

Primary area of influence includes the following cadastre municipalities.

Table 1 - Cadastre municipalities within the primary area of influence

Municipality	Cadastre Municipalities
Municipality Valjevo	Gola glava
	Brankovina
	Blizonje
	Pambukovica
Municipality Ub	Radusa
	Slatina
	Krsna glava
	Druzetic
Municipality Koceljeva	

The secondary area of influence which includes the wider flood area of the Ub river basin and is potentially impacted by Phase II of the project, could be indirectly impacted by the project through increased demand in agricultural land and workforce demand. In addition to the Cadastre Municipalities included in the primary area of influence it also includes the municipalities centres – Ub and Valjevo, as well Cadastre Municipalities listed in **Error! Reference source not found..**

**Table 2 - Cadastre municipalities within the secondary area of influence**

Municipality	Cadastre Municipalities	
Municipality Valjevo	Babina luka	Oglađenovac
	Joševa	Vlašić
	Miličnica	
Municipality Ub	Brgule	Murgaš
	Crvena jabuka	Šarbane
	Čučuge	Sovljak
	Dokmir	Stublenica
	Gunjevac	Takovo
	Gvozdenović	Trlić
	Joševa	Trnjaci
	Liso polje	Tvrdojevac
	Lončanik	Ub
	Milorci	Zvizdar
Municipality Koceljeva	Zukve	Koceljeva

### 1.3 Project Activities and Identification of Impacts

In addition to the overall benefits of the project which include stable flood management and overall security there is a wider positive impact from the large infrastructure projects. Most of the impacts noted in this chapter related to land acquisition, labour management and stakeholder engagement will be addressed in detail in the following chapters.

#### 1.3.1 Pre-construction phase

The main socio-economic impacts on the local community are related to the expropriation of land, particularly of agricultural land. The loss of agricultural land could impact the ability of some households to continue with agricultural production, which could impact the households' livelihoods. On the other hand, the compensation received for the land could provide an opportunity for the households for investments in agriculture or other business or improvements in their living conditions.

#### 1.3.2 Construction phase

The Project will generate direct employment opportunities for skilled and unskilled workforce in the area, but will also indirectly generate increased opportunities in employment and procurement locally:

- Additional income from leasing of land or properties for accommodation of the workforce
- Catering for the workforce
- Transportation services
- Equipment maintenance
- Purchasing of goods and materials

The potential negative impacts during construction phase include:

- Construction related nuisances – dust, mud, noise and vibration
- Increased truck and heavy machine traffic on local roads
- Increased tensions due to construction related disruptions
- Additional stress on local services and utilities due to influx of workers
- Community anxiety and tensions due to influx of foreign workers (expected in case of international Contractors)

### 1.3.3 Operation phase

There are no overall negative socio-economic impacts associated with the operational phase. However, adding to the overall scope of the Project (with intended functions of flood protection, irrigation, maintaining of ecological flow, and retention of sediments), the new infrastructure could possibly provide opportunities for some tourism and recreational activities.

## 1.4 Purpose of SIA

This chapter includes the overview of the socio-economic profile of the communities and population residing within the Project's Area of Influence (AOI), which includes individuals and households directly affected by land acquisition for the Project, but also those indirectly affected by the Project's broader impacts, and looks into the potential social impacts of the project. These may include impacts related to construction activities, increased traffic, access disruptions, temporary loss of income, noise, and dust, as well as potential economic opportunities such as local employment and procurement. The aim is to provide a comprehensive understanding of the current baseline situation to inform adequate planning, impact prevention, minimisation and mitigation.

The objectives of the Social Impact Assessment (SIA) include:

- Establishing a demographic, economic, and social baseline for the settlements within the AOI, drawing on census data, municipal statistics, and primary survey data;
- Identifying and categorizing different groups of PAPs (e.g., landowners, users, tenants, informal users, and other residents impacted directly or indirectly by the Project);
- Assessing the vulnerability of specific population segments, such as elderly residents, single-person households, unemployed individuals, and minority or marginalized groups (e.g., Roma), with attention to gender, household composition, and access to economic opportunities;
- Evaluating both adverse and positive social impacts associated with project implementation, including but not limited to land acquisition, construction-related disturbances, and employment generation;
- Informing further development of targeted mitigation and compensation measures to address identified risks, with particular attention to vulnerable households;
- Supporting the design of effective engagement and grievance redress strategies that are inclusive of all affected groups.

This SIA document presents an overview of the socio-economic context and high-level impacts based on available statistical data and the findings of the initial household survey. It is intended as a preliminary assessment and will be further expanded during the disclosure period once the additional data is collected through follow-up surveys and focus group discussions. More detailed analysis and disaggregated findings will be provided in the updated version of this report. Relevant updates will be introduced into the Historical Land



Acquisition Audit with Corrective Action Plan, and reflected in the Livelihood Restoration Plan to be developed for the Project.

## 1.5 Legislation and Standards

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 has been identified and listed based on the Project scale, nature, and the agreed-upon scope of the Project assessment.

### 1.5.1 National legislation

Below is selection of main national legislation relevant to the socio-economic assessment of impacts on the local communities from infrastructure projects in Serbia, which will be considered for this Assignment:

- Family Law. (Official Gazette of RS, No. 18/2005, 72/2011 and 6/2015)
- Labour Law. (Official Gazette of RS, No. 24/2005, 61/2005, 21/2013, 75/2014, 13/2017, 113/2017 and 95/2018)
- Law on Social Protection. (Official Gazette of RS, No. 24/2011 and 117/2022)
- Act on the Prohibition of Discrimination. (Official Gazette of RS, No. 22/2009 and 52/2021)
- Law on the Planning System of the Republic of Serbia. (Official Gazette of RS, No. 30/2018)
- 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 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)
- The 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)
- 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)

Document	Description
The Family Law ("Official Gazette of RS", No. 18/2005, 72/2011 and 6/2015). <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/18/7/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/18/7/reg</a>	This law regulates: marriage and marital relations, relationships in a common-law partnership, child-parent relationships, adoption, foster care, guardianship, maintenance, property relations within the family, protection from domestic violence, procedures related to family relations, and personal names.
The Labour Law ("Official Gazette of RS", No. 24/2005, 61/2005, 21/2013, 75/2014, 13/2017, 113/2017 and 95/2018) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/24/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/24/1/reg</a>	This law regulates the rights, obligations, and responsibilities arising from employment or work.
The Law on Social Protection ("Official Gazette of RS", No. 24/2011 and 117/2022)	This law regulates the field of social protection, the goals and principles of social



Document	Description
<a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/24/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/24/2/reg</a>	protection, the rights and services of social protection, the procedures for exercising rights in social protection and using social protection services, the rights and obligations of social protection beneficiaries and other conditions related to the establishment and operation of social protection institutions and workers in social protections system.
The Act on the Prohibition of Discrimination (Official Gazette of RS, No. 22/2009 and 52/2021 <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/22/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/22/1/reg</a>	This law regulates the general prohibition of discrimination, the forms and cases of discrimination, as well as the procedures for protection against discrimination.
The Law on the Planning System of the Republic of Serbia ("Official Gazette of RS", No. 30/2018) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg</a>	This law regulates the planning system of the Republic of Serbia, including the management of the public policy system and medium-term planning. It defines the types and contents of planning documents that all participants in the planning system propose, adopt, and implement according to their competencies. It also addresses the mutual alignment of planning documents, the procedure for determining and implementing public policies, the obligation to report on the implementation of planning documents, and the corresponding application of the obligation to conduct impact analyses on regulations and evaluate the effects of these regulations.
Law on Strategic Environmental Impact Assessment ("Official Gazette of the Republic of Serbia", No. 94/2024) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg</a>	This law regulates the conditions, methods, and procedures for assessing the impact of certain plans and programs on the environment (strategic assessment), aiming to protect the environment and promote sustainable development by integrating fundamental principles of environmental protection into the process of preparing and adopting plans and programs.
The Environmental Impact Assessment Law ("Official Gazette of the Republic of Serbia", No. 135/2004 and 36/2009) <a href="https://pravno-informacioni-sistem.rs/viewAct/f80f0a5d-e212-4bb3-9efc-7eeee2786437">https://pravno-informacioni-sistem.rs/viewAct/f80f0a5d-e212-4bb3-9efc-7eeee2786437</a>	This law regulates the conditions, manner, and procedure for assessing the impact of certain plans, programs, and projects on the environment. Additionally, it governs the scope and content of spatial, urban planning, and technical documentation.
The Law on Planning and Construction ("Official Gazette of the Republic of Serbia", No. 72/2009, 81/2009 - corr., 64/2010 - decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 - decision of the Constitutional Court, 50/2013 - decision of the Constitutional Court, 98/2013 - decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg</a>	This law regulates the conditions and manner of spatial planning, development, and use of construction land and facilities, supervision over the implementation of the provisions of this law and inspection supervision, as well as other important issues related to spatial planning, development, and use of construction land and facilities. It should also be noted that according to Article 134a of this law, an investor investing in the construction of linear infrastructure facilities of special significance for the Republic of Serbia is obliged to provide the owner of a residential

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	building constructed before the spatial plan designating the land for public purposes came into force, with another suitable residential building or apartment, regardless of whether proceedings for the legalization of that building have been initiated, or to pay them monetary compensation in the amount necessary to provide another suitable residential building or apartment.
The 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) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg</a>	This regulation specifies the methodology for managing public policies in detail, particularly the scope, process, and control of impact analysis during the creation of public policy documents, as well as the analysis of impacts after their adoption. It includes the procedures for conducting consultations and public discussions on public policy documents, the content and form of public policy documents, the elements of impact analysis of adopted public policy documents, the method of reporting on the results of public policy implementation, the method of evaluating public policy effects, and the areas of planning and implementing public policies.
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) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg</a>	This rulebook specifies in detail the content, method, and procedure for drafting spatial and urban planning documents.
The Rulebook on the Content of the Environmental Impact Assessment Study (“Official Gazette of RS”, No. 69/05) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg</a>	This rulebook specifies in detail the content of the request for deciding the need for an impact assessment and the content of the request for determining the scope and content of the environmental impact assessment study.

### 1.5.2 EBRD Requirements

EBRD E&S Performance Requirements relevant to socio-economic assessment include:

- **PR1 - Assessment and Management of Environmental and Social Impacts and Issues**  
PR 1 provides the overarching framework for conducting Social Impact Assessments. It requires the identification and analysis of potential social risks and impacts—including those related to land acquisition, labour, community health and safety, and vulnerable groups—through stakeholder engagement and data collection.
- **PR 2 - Labour and Working Conditions**  
PR 2 promotes fair treatment, non-discrimination, and equal opportunity for workers. It requires compliance with national labor laws and international labor standards, including provisions on contractor labour management, vulnerable workers, freedom of association, , worker grievance mechanisms, and avoidance of child or forced labor.
- **PR 4: Health, Safety and Security**  
PR 4 aims to protect the health, safety, and security of workers, communities, and consumers from project-related risks. It includes risk prevention, emergency preparedness, and managing security personnel responsibly.

- PR 5: Land Acquisition, Involuntary Resettlement and Economic Displacement  
PR 5 seeks to avoid or minimize involuntary resettlement and economic displacement. When unavoidable, it ensures compensation at replacement cost, livelihood restoration, and meaningful consultation with affected persons.
- PR 8: Cultural Heritage  
PR 8 aims to protect cultural heritage from project-related risks and impacts. This includes tangible and intangible heritage, requiring consultation with affected communities and relevant authorities.
- PR 10: Information Disclosure and Stakeholder Engagement  
PR 10 ensures that projects engage meaningfully with stakeholders throughout the project cycle. This includes timely disclosure of information, consultations, and a functioning grievance mechanism.

### 1.5.3 Regional and global standards and requirements

Following regional and global standards and requirements will be taken into consideration as part of the Project assessment:

- World Bank Group Environmental, Health, and Safety (EHS) Guidelines
- EBRD Paris Agreement alignment methodology

## 1.6 Methodology

An impact assessment has been conducted based on available documents, including the Environmental Impact Assessment (EIA), Project for a Building Permit, and Spatial Plans, as well as the characteristics of the project and the study area. The assessment relied on a review of secondary data sources, including project documentation, publicly available data, and applicable legislation and standards relevant to socio-economic assessment, as well as collection of primary data through survey of the affected communities.

The assessment was conducted in line with the overall methodology for the ESIA as presented in BOOK 1 Introduction.

The collection and processing of baseline data presented in this chapter has been carried out using a combination of methods, including desktop review, initial surveys, and field observations. In addition, data will be collected through additional survey and focus group discussions.

### Desktop review

- Desktop review and analyses of official socio-economic statistical data available online from the Statistical Office of the RS, at village and municipal level<sup>1</sup>
- Desktop review and analyses of other publicly available data from various sources, including the National Employment Agency of the RS, the Business Registry of the RS, municipal studies and plans, etc.

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<sup>1</sup> Statistical Office of the Republic of Serbia (2023) 2022 Census of Population, Households and Dwellings: 1) *Households According to the Number of Members*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234005.pdf>; 2) *Age and Sex* Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234003.pdf>; 3) *Small settlements population*. Available at: <https://publikacije.stat.gov.rs/G2025/Pdf/G20254012.pdf>; 4) *Ethnicity*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234001.pdf>; 5) *Educational Attainment, Literacy and Computer Literacy*. Available at: [publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf](https://publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf) 6) *Census 2022 – Excel tables* Available at: <https://popis2022.stat.gov.rs/sr-latn/popisni-podaci-eksel-tabele/>

- Feedback obtained during stakeholder meetings held with representatives of the municipalities Ub and Valjevo
- Data collected through the survey of households in the Project area, focussing on cadastre municipalities directly impacted by the Project (CM Pambukovica, Radusa, Slatina and Gola Glava) as well as neighbouring cadastre municipalities, who might be indirectly affected by Project activities, and could be included in phase II of the project (irrigation system)

### **Initial Survey**

To further inform the baseline socio-economic assessment derived from the general statistical data, an initial socio-economic survey was carried out in the Project area in December 2024. Data was collected through the household interviews.

The questionnaires focused on the following areas:

- Basic socio-demographic data
- Information on household incomes and expenditures
- Information on the expropriated property (if applicable)
- Level of awareness of the Project and public perception.

Sampling was carried out on randomised basis, leaning more heavily on the households whose property is directly affected by the Project and is expropriated/in process of expropriation. A total of 84 households were interviewed, including 34 PAPs directly affected by land acquisition and 50 other individuals residing in project area but not directly affected. The survey of PAPs not directly affected by land acquisition was carried out to get a general impression of the interest among the broader community regarding the potential second phase of the Project which stipulates the development of an irrigation system from the dam to support local agricultural production, particularly in water-insecure areas. Throughout this report, the surveyed population is referred to as 'respondents'.

These interviews were carried out in the cadastral; municipalities of Dražetić, Brankovina, Gola Glava, Raduša, Pambukovica, Slatina, Tvrdojevac, Zvizdar, and Gunjevac, with more focus being placed on the communities downstream from the dam.

During the survey, the respondents were informed that their participation in the survey was entirely voluntary, that their identities would remain anonymous throughout the lifecycle of the Project, and that they had the right to withhold any information they did not wish to share. Moreover, they were also informed that the data collected would be used to make generalized conclusions only.

The questionnaires used for the survey of the 34 PAPs directly affected by land acquisition were more detailed than those used for the 50 PAPs residing in the project area but not directly affected. Of the 34 directly affected PAPs, 29 questionnaires were considered relatively complete and were included in the analysis, bringing the total number of analyzed questionnaires to 79. Separate databases were prepared to document the survey results for PAPs directly affected by land acquisition and those not directly affected.

### **Additional Survey**

Due to concerns that the initial sample of surveyed PAPs was limited and the sampling approach was not stratified, therefore may not have provided a comprehensive picture of

individual impacts on the PAPs, and allow identification of PAPs groups, who might be adversely impacted by the project due to their vulnerabilities, additional surveys with PAPs will be conducted during the ESIA public disclosure period.

The overall target for the additional survey sample is 60 people, representing 20% of all PAPs directly affected by the land acquisition, excluding those who were already surveyed during the initial round. The sample for additional survey will be carefully designed to ensure appropriate representation of communities and vulnerable groups. These include women-led households, households with income below the poverty line, elderly individuals without family support, single parents with minors, households experiencing significant land impact, those left with unviable land plots, households with disabled members, ethnic minorities, and other groups.

Ensuring the inclusion of these subgroups will enhance the representativeness of the data and support the identification of individuals who may be disproportionately affected by the Project. This will contribute to more effective mitigation planning and stakeholder engagement.

The additional surveys are expected to be conducted through two main avenues – individual/random surveys and targeted surveys, as well as discussions in focus groups, with the purpose to fill existing data gaps and ensure that the perspectives of vulnerable and underrepresented groups are adequately captured. This document will be updated based on the findings of the additional surveys, which will also inform the preparation of the Livelihood Restoration Plan.

## **1.7 Assumptions and limitations (if applicable)**

The limitations of this assessment reflect the availability and quality of input data used in the analysis of socio-economic impacts.

- Limited availability of statistical data – there is limited data available at village level across all considered parameters. Municipality level data was considered where appropriate.
- Limited engagement from community representatives – village representatives were interviewed and provided general information about the social patterns and economic activities in the village, however there was limited support at Municipality level.
- Limited initial survey sample – the initial households survey captured a partial snapshot and will need to be supplemented.
- Information on land expropriation and PAPs required further verification – existing data on land impacts needs to be reviewed and validated. Additionally, there may be further land acquisition needs related to road realignment, access to sediment traps, biodiversity offsets, road widening, and other ancillary project components.

This report has been prepared based on a review of the information available at the time of its preparation. It will be further updated during the disclosure period to incorporate information collected through additional survey and focus group discussions.



## 1.8 Baseline

The socio-economic baseline for the Pambukovica Dam project provides a birds-eye overview of the current socio-economic conditions in the area surrounding the project site. This analysis encompasses the cadastre municipalities (CM) of Pambukovica, Raduša and Slatina within the Municipality Ub, and CM Gola Glava which is under the jurisdiction of the city of Valjevo.

Utilizing data from the 2022 national census, this baseline report aims to inform stakeholders and the client by presenting an overview of social statics and dynamics in the region. The data collected offers insights into the population structure, highlighting key demographics such as age distribution, gender composition, and educational attainment levels. Furthermore, it examines employment patterns, shedding light on the overall economic health of the community. In addition to economic indicators, the baseline considers critical social parameters, including access to healthcare, housing conditions, and educational facilities.

Due to the limitations of the databases acquired from the Statistical office of the Republic of Serbia, some of the data will be presented on the level of the Municipality (Opština) while some will be micro focused on the Cadastre municipalities (Mesne zajednice) within the Municipalities of Valjevo and Ub, which are directly affected by the project. Thus, for some points of data, we assume that the state of things observed in the Municipalities is the same or worse in the cadastre municipalities, as we are talking about agrarian areas, with rapidly aging populations.

### 1.8.1 Population and demographics

According to available statistical information<sup>2</sup>, the **Municipality of Ub** has a total population of 25.780. Said population is divided into 9,121 households. Of these, 2,484 (27.2%) are single member households. Additionally, 1,874 (20.5%) households are considered elderly households, meaning they are exclusively composed of individuals aged 65 and above. Considering that elderly households make up over one-fifth (20.54%) of all households in the municipality of Ub, it is evident that the population is aging. It should be noted that the demographic structure in surrounding villages (particularly those affected by the project) is even more skewed toward older age groups. Younger residents from these areas often migrate to the capital, Belgrade, or to nearby urban centres, like Ub or Valjevo, in search of employment opportunities.

Within the Municipality of Ub, three cadastre communities are directly affected by the Project: Pambukovica, Raduša and Slatina. Details for each community are provided below:

- CM Pambukovica boasts 262 households with a population of 740. Of those 380 are men and 360 are women. Compared with the data found in the census of 2011, the population of Pambukovica has decreased from 988 to 740, that is to say by 25.1%.

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<sup>2</sup> Statistical Office of the Republic of Serbia (2023) 2022 Census of Population, Households and Dwellings: 1) *Households According to the Number of Members*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234005.pdf>; 2) *Age and Sex* Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234003.pdf>; 3) *Small settlements population*. Available at: <https://publikacije.stat.gov.rs/G2025/Pdf/G20254012.pdf>; 4) *Ethnicity*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234001.pdf>; 5) *Educational Attainment, Literacy and Computer Literacy*. Available at: [publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf](https://publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf) 6) *Census 2022 – Excel tables* Available at: <https://popis2022.stat.gov.rs/sr-latn/popisni-podaci-eksel-tabele/>

- CM Raduša has a population of 180, with 89 being men and 91 being women. The local population is organized into 130 households and has seen a population decrease of 28.3%, from 251 citizens in 2011 to 180 in 2022.
- CM Slatina is organised into 100 households, with a total population of 222, of whom 121 are men and 101 are women. The local community has seen a population decrease of 17.1% in the 2011-2022 period, dropping from 345 to 222.

The **Municipality of Valjevo** is the larger and more developed of the two. According to statistical information<sup>2</sup>, the Municipality boasts a population of 82,169, subdivided into 32.664 households. Of those households 9.408 are single member households (28.8%) and 6.676 are elderly households, of which 4.583 are single person households. We can see that the Valjevo Municipality also has a significant percentage of elderly households, totalling to 22.32% of all households, even higher than the Ub Municipality.

The only cadastre municipality directly affected by the Project, within the Municipality of Valjevo is CM Gola Glava with a population of 499 residents, which live within 167 households. The gender breakdown of the population is 263 men and 236 women. The local community has seen their population decrease in the 2011 to 2022 period by 11.52%, from 564 to 499. Details on the general demographic profile of the project area are provided in Table 3.

**Table 3 - General demographic profile**

	Category							
Municipality / Settlement	Number of Households	Population	Gender Distribution		Single Member Households		Elderly Population	
			male	female	people	%	people	%
<b>Municipality of Ub</b>	9.121	25.780	13.022	12.758	2484	27.2%	5.598	20.5%
Pambukovica	262	740	380	360	85	32.4%	188	25.4%
Raduša	130	180	89	91	28	21.5%	54	30%
Slatina	100	222	121	101	33	33%	62	27.9%
<b>Municipality of Valjevo</b>	32.664	82.169	39.915	42.254	9.408	28.8%	18.762	22.32%
Gola Glava	167	499	263	236	45	26.9%	129	25.8%

Source: 2022 Census of Population, Households and Dwellings, Statistical Office of the Republic of Serbia<sup>3</sup>

## Age Distibution

Statistical information on the population of project area by gender and age is presented in Table 4.

<sup>3</sup> Statistical Office of the Republic of Serbia (2023) 2022 Census of Population, Households and Dwellings: 1) *Households According to the Number of Members*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234005.pdf>; 2) *Age and Sex* Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234003.pdf>; 3) *Small settlements population*. Available at: <https://publikacije.stat.gov.rs/G2025/Pdf/G20254012.pdf>; 4) *Ethnicity*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234001.pdf>; 5) *Educational Attainment, Literacy and Computer Literacy*. Available at: [publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf](https://publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf) 6) *Census 2022 – Excel tables* Available at: <https://popis2022.stat.gov.rs/sr-latn/popisni-podaci-eksel-tabele/>

**Table 4 - Population of project area settlements by age and gender**

Age	Municipality of Ub												Municipality of Valjevo					
	Ub			Pambukovica			Radusa			Slatina			Valjevo			Gola Glava		
	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female	Total	Male	Female
Total population	25780	13022	12758	740	380	360	180	89	91	286	150	136	82169	39915	42254	499	263	236
0-4	1249	640	609	25	12	13	6	2	4	20	12	8	3674	1847	1827	21	15	6
5-9	1265	666	599	28	12	16	8	3	5	9	5	4	3703	1900	1803	31	23	8
10-14	1288	650	638	42	25	17	6	5	1	11	5	6	3820	1996	1824	27	10	17
15-19	1396	742	654	49	24	25	5	3	2	29	17	12	3869	1964	1905	17	9	8
20-24	1352	666	686	32	12	20	10	8	2	13	5	8	3877	2036	1841	24	15	9
25-29	1429	714	715	34	15	19	12	4	8	10	6	4	4272	2193	2079	27	15	12
30-34	1582	850	732	43	22	21	6	5	1	9	7	2	4839	2461	2378	29	10	19
35-39	1554	848	706	40	22	18	12	6	6	23	10	13	5445	2788	2657	26	11	11
40-44	1641	870	771	34	18	16	4	2	2	20	10	10	5685	2890	2795	22	13	9
45-49	1785	927	858	50	32	18	15	5	10	19	12	7	5826	2895	2931	32	18	14
50-54	1764	925	839	58	32	26	10	6	4	17	9	8	5558	2588	2970	40	19	21
55-59	1875	996	879	61	37	24	13	7	6	25	15	10	6054	2918	3136	37	21	16
60-64	2002	980	1022	56	26	30	19	11	8	19	11	8	6785	3190	3595	37	20	17
65-69	2091	1013	1078	72	37	35	22	13	9	25	11	14	6676	3118	3558	38	21	17
70-74	1601	756	845	50	27	23	14	4	10	11	5	6	5331	2413	2918	25	11	14
75-79	836	369	467	29	15	14	7	4	3	11	4	7	2946	1257	1689	30	14	16
80-84	613	235	378	16	4	12	4	1	3	6	4	2	2168	819	1349	23	7	16
85 and over	457	175	282	21	8	13	7	-	7	9	2	7	1641	642	999	13	7	6
Adult population	21137	10629	10508	617	317	300	157	78	70	227	116	111	68722	33039	35683	410	208	202
Average age	43.65	42.72	44.59	45.98	45.93	46.04	48.72	46.16	51.21	43.26	41.71	44.96	44.90	43.57	46.17	45.86	43.64	48.33

Source: 2022 Census of Population, Households and Dwellings, Statistical Office of the Republic of Serbia<sup>4</sup>

A key demographic feature across all project-affected settlements is the high proportion of adults within the total population, particularly in the rural communities. In Pambukovica, Raduša, Slatina, and Gola Glava, adults make up between 79% and 87% of the population, which is significantly higher than the overall average for Valjevo municipality. For instance, 87.2% of Raduša's population is considered adult, followed by 83.4% in Pambukovica, 82.2% in Gola Glava, and 79.4% in Slatina. These figures reflect the presence of a predominantly middle-aged and older population, and a relatively small proportion of children and youth. This demographic structure is typical of rural areas experiencing out-migration, where younger generations leave for Belgrade or nearby urban centers such as Ub and Valjevo in search of employment and education opportunities, resulting in a resident base that is aging and slowly declining.

This trend is further supported by the average age data, which shows that the affected rural settlements have average ages ranging from 45.9 to 51.2 years. Among these, Raduša and Gola Glava show the highest average ages (48.7 and 48.3 years, respectively), suggesting

<sup>4</sup> <https://publikacije.stat.gov.rs/G2023/Pdf/G20234003.pdf>

limited generational renewal. The share of elderly residents (aged 65 and over) is also considerable in these villages, further underlining the aging demographic. Such a population structure has implications for project-related planning, particularly in ensuring that information disclosure, consultations, and livelihood support measures are tailored to the needs and capacities of older individuals and single-member households

Survey data also confirms that the project-affected settlements are predominantly inhabited by older age groups. The largest proportion of respondents falls within the 56–65 age group, accounting for 35.44% of the sample (including 38.18% of male and 29.16% of female respondents), which is consistent with census data showing high adult and elderly population shares. A further 26.58% of respondents are aged 66–75, highlighting a significant presence of senior residents across the surveyed communities (this includes 21.82% of male and 37.55% of female respondents). This demographic composition suggests that many residents are beyond typical working age and are unlikely to engage directly with or participate actively in project-related activities.

The 46–55 age group represents 15.19% of respondents (this includes 20.00% of male and 4.17% of female respondents). Respondents from the 36–45 age groups comprise 11.39% of the sample (this includes 7.27% of male and 20.83% of female respondents). While smaller in proportion, this group includes working-age individuals who may still be active in the local economy and thus could represent a potential labour pool for the project. Their involvement could be relevant, particularly if local employment opportunities are generated.

Respondents above-75 and between 26–35 comprise only 7.6% (9.09% of male and 4.17% of female respondents) and 3.8% (3.65% of male and 4.17% of female respondents) of the sample respectively, indicating very limited representation. Most notably, there were no respondents aged 18–25. This absence highlights a clear gap in the younger adult demographic, likely reflecting broader rural out-migration trends as younger people leave in search of education or employment in urban centers such as Belgrade, Ub, or Valjevo.

## **Gender**

With respect to gender, based on analysis of the statistical data in Table 4 above, the gender distribution in the project-affected area is generally balanced, with only slight variations between male and female populations across the different settlements. In the Municipality of Ub, the total population is 25,780, with 13,022 males (50.5%) and 12,758 females (48.6%), indicating a near-equal gender split. This pattern is similarly reflected at the settlement level. In Pambukovica, males account for 380 (51.4%) and females 360 (48.6%), while in Slatina the male population is 150 (52.4%) compared to 136 females (47.6%). Raduša is the only settlement in Ub municipality where the female population slightly exceeds the male population - 91 females (50.6%) to 89 males (49.4%).

In the Municipality of Valjevo, which has a larger total population of 82,169, the gender distribution also remains fairly even, with 39,915 males (48.6%) and 42,254 females (51.4%). In the rural settlement of Gola Glava, 263 residents are male (52.7%) and 236 are female (47.3%), showing a modest male predominance.

Overall, the gender ratios across the project area reflect a balanced demographic structure. However, slight male predominance in some rural settlements may be influenced by local migration dynamics or demographic aging. These gender patterns should be considered

during stakeholder engagement and planning of project-related activities to ensure inclusive participation and equal access to benefits and mitigation measures for both men and women.

According to initial survey data, 30.38% of respondents were women, while 69.62% were men. In nearly all cases, men were identified as the heads of household, which reflects the broader national situation of male-dominated ownership and decision-making. This pattern is particularly pronounced in rural Serbia, where traditional norms persist despite gradual improvements in gender equity. Men are more likely to hold legal titles to land and property, while women often acquire ownership only through succession. This unequal distribution of ownership is also evident in the preliminary data on PAPs: out of an estimated 307 PAPs, approximately 208 are male and only 99 are female title holders.

Additional surveys and consultations will aim to gather more detailed sex-disaggregated data, including women's roles in decision-making, access to land and resources, livelihood strategies, and potential vulnerabilities. This will support a more inclusive understanding of gender dynamics and inform the development of targeted mitigation and livelihood restoration measures.

## **Ethnic composition**

The population of the project area, encompassing the Municipalities of Ub and Valjevo, is predominantly of Serbian ethnicity, with several recognized national minorities present in smaller numbers (see Table 5).

In the Municipality of Ub, out of a total population of 25,780, Serbs constitute the overwhelming majority with 23,771 people, representing approximately 92.2% of the total population. The Roma community is the largest minority group, with 795 individuals (approximately 3.1%). Other residents self-identify with national or ethnic groups, such as Romanians, Yugoslavs, Macedonians, and Montenegrins, who are present in much smaller numbers. A small number of individuals (118) chose not to declare their national or ethnic affiliation, while 893 individuals are recorded as "unknown," suggesting either incomplete census data or reluctance to disclose this information.

Similarly, the Municipality of Valjevo has a total population of 82,169, of which 76,367 people (approximately 93%) identify as Serb. The Roma population in Valjevo numbers 1,275 individuals (about 1.6%), followed by smaller communities of Yugoslavs, Montenegrins, and other self-identified ethnic or national groups. There is a relatively high number of individuals with undeclared (736) or unknown (3,246) ethnicity, which collectively account for nearly 4.8% of Valjevo's total population.

Across both municipalities, the gender distribution within each ethnic group closely mirrors the overall gender split, with males and females nearly evenly represented in most categories. The Roma community, for example, consists of 402 males and 393 females in Ub, and 661 males and 614 females in Valjevo.

According to 2022 census data, the greater area of the Project (Kolubarska oblast) has a Roma population of 3,288. Municipality of Valjevo is home to 1,275 Roma people, while the Municipality of Ub has a population of 795 people. Cadastre municipalities directly affected by the Project register less than 1% of people identifying as Roma.



**Table 5 - Population by ethnicity and sex, by municipalities and cities**

Ethnicity or Nationality	Municipality of Ub			Municipality of Valjevo		
	Total	Male	Female	Total	Male	Female
Total population	25780	13022	12758	82169	39915	42254
Serbs	23771	12000	11771	76367	36969	39398
Albanians	9	4	5	14	5	9
Yugoslavs	25	13	12	140	65	75
Hungarians	3	1	2	21	12	9
Macedonians	20	9	11	44	15	29
Muslims	5	4	1	23	12	11
Roma	795	402	393	1275	661	614
Romanians	53	28	25	3	1	2
Russians	11	4	7	34	8	26
Croats	14	3	11	38	7	31
Montenegro	14	3	11	49	23	26
Other	44	10	34	166	91	75
Regional affiliation	5	4	1	13	3	10
Did not declare	118	58	60	736	338	398
Unknown	893	479	414	3246	1705	1541

Source: 2022 Census of Population, Ethnicity Data by Municipalities and Cities, Statistical Office of the Republic of Serbia<sup>5</sup>

The overall ethnic homogeneity of the region suggests that public communication and project engagement efforts can largely be conducted in Serbian. The Kolubara District, where the project area is located, is among the districts with lower registered Roma populations, both in number and proportion. However, the presence of the Roma population even in small numbers may require targeted outreach to ensure their voices are heard and that they are not excluded from consultations, compensation processes, or employment opportunities related to the project. To better understand the ethnic composition and any specific vulnerabilities, data will be collected during the additional survey and focus group discussions. Special attention will be given to capturing the perspectives and needs of minority and vulnerable populations, particularly since ethnicity data was not collected during the initial survey.

## Household Size

Household structure in the project area reflects broader demographic trends in Serbia, with a mix of single-member households and small to medium-sized family units. Data according to the 2022 census for project area municipalities is presented in Table 6 below.

**Table 6 - Households by number of members, by municipalities and cities**

Community	Total	Number of members in household						Average number of members
		1	2	3	4	5	6 and more	
Municipality of Ub	9121	2484	2269	1590	1286	719	773	2.82

<sup>5</sup> <https://publikacije.stat.gov.rs/G2023/PdfE/G20234001.pdf>

Community	Total	Number of members in household						Average number of members
		1	2	3	4	5	6 and more	
Municipality of Valjevo	32664	9408	9455	6168	4812	1735	1086	2.51

*Source: 2022 Census of Population, Households According to Number of Members, Data by settlements, Statistical Office of the Republic of Serbia<sup>6</sup>*

Nationally, there are 2,589,344 private households, with an average household size of 2.55 members. In the Municipality of Ub, there are a total of 9,121 households, with an average household size of 2.82 members. A significant portion of these (2,484 households or 27.2%) are single-member households, potentially indicating a high proportion of elderly or isolated individuals. Two-member households also represent a substantial share, with 2,269 households (24.9%). Three- and four-member households are present in smaller but notable numbers (17.4 and 14.1% respectively), while larger households (with five or more members) comprise just over 16% of the total.

In the Municipality of Valjevo, which includes a more urbanized population, the average household size is smaller, at 2.51 members. Among the 32,664 households, 9,408 are single-member households (28.8%), and 9,455 have two members (28.9%). This suggests an even greater tendency toward smaller household units compared to Ub, likely reflecting a combination of aging population and urban living patterns. Only around 8.5% of households in Valjevo consist of five or more members.

These figures confirm earlier findings that the project area, particularly in its rural parts, is characterized by aging and often socially isolated populations. The prevalence of small households—especially single and two-member units—has important implications for social vulnerability, accessibility of information, and the design of stakeholder engagement and compensation mechanisms. It also points to potential limitations in labour availability, as fewer large households may mean limited numbers of economically active members per household.

Based on the survey data, two-member households dominate the sample, comprising 27.85 % (significantly higher than census data), indicates a prevailing trend towards smaller family units (this includes 27.27% of male and 29.16% of female respondents).

In contrast, single-member households seems to be underrepresented at 11.4% in the survey (including 9.09% of male and 16.67% of female respondents) compared to 27.2% in the census. This suggest that older individuals living alone may have been less likely to participate in the survey, possibly due to limited accessibility or willingness to engage. Meanwhile, three-member households are reported at 13.92% in the survey (including 12.72% of male and 16.67% of female respondents), which is slightly lower than 17.4% in census data. This indicates a smaller portion of families that may consist of parents and one child, reinforcing the trend toward fewer dependents per household.

For four-member households survey reports 17.72% (including 20.00% of male and 12.5% of female respondents), compared to 14.1% of the census, which is relatively consistent. Similarly, households with more than five or more members account for 13.92% each (both

<sup>6</sup> <https://publikacije.stat.gov.rs/G2023/PdfE/G20234005.pdf>

of the sample (both groups include 14.55% of male and 12.50% of female respondents), aligning with the 16.4% in the census. This demonstrates that while smaller households are common, there remains a notable proportion of slightly larger family units in these communities. Usually, these are multigeneration households, typically consisting of parents and one child that is married or two children.

Overall, discrepancies between census and survey data indicate that the survey sample may be skewed toward mid-sized and multi-person households, while smaller and particularly single-member households—often older and more vulnerable—may be underrepresented. To address this gap and improve representativeness, the additional survey will aim to capture a broader range of household types, with specific attention to reaching elderly individuals and single-member households.

## Number of Children per Household

Data from the 2022 Census reveals that in both the Municipality of Ub and the Municipality of Valjevo, the majority of families with children have one or two children, indicating a trend toward smaller family sizes across the project area (see Table 7). It should be noted that there is no separate category in publicly available census outputs that explicitly states the number of minor children (under 18 years old) living in each household. Instead, the available data refers to families by the number of children (regardless of age). Due to the absence of specific data on minors, we relied on the best available indicators to possibly inform this analysis.

**Table 7 - Families with children by type and number of children, by municipalities**

Municipality	Type of family	Total	Families by number of children				
			1	2	3	4	5 and more
Municipality of Ub	Total for municipality	5092	2751	1727	464	111	39
	Marital couple with children	3406	1593	1355	356	75	27
	Consensual couple with children	273	129	77	35	24	8
	Mother with children	1030	764	206	47	10	3
	Father with children	383	265	89	26	2	1
Municipality of Valjevo	Total for municipality	16496	9467	5837	1010	148	34
	Marital couple with children	10907	5340	4613	818	110	26
	Consensual couple with children	429	234	133	41	17	4
	Mother with children	4053	3095	820	116	19	3
	Father with children	1107	798	271	35	2	1

Source: 2022 Census of Population, Families, Data by settlements, Statistical Office of the Republic of Serbia<sup>7</sup>

Based on census data. for the nationwide level, census results show that about 54.3% of families with children have one child, 36.1% have two children, 7.8% have three, and fewer than 2% have four or more. In the Municipality of Ub, there are 5,092 families with children. Of these, 54% (2,751) have only one child, while 33.9% (1,727) have two children. Families with three or more children are much less common, comprising only 17.2% of all families (464 with three

<sup>7</sup> <https://publikacije.stat.gov.rs/G2023/PDFE/G20234012.pdf>

children, 111 with four, and 39 with five or more). Most families are married couples with children (3,406), followed by single mothers (1,030), and single fathers (383). Consensual (non-marital) unions account for a smaller share (273 families), but they still contribute to the overall family landscape.

Similarly, in the Municipality of Valjevo, the pattern is consistent. Out of 16,496 families with children, the majority (57.4% or 9,467) have one child, while 35.4% (5,837) have two children. Only 7.1% of families have three or more children. The distribution by family type is also similar to Ub: most families are married couples (10,907), followed by single mothers (4,053), and single fathers (1,107). Consensual unions are slightly more frequent in Valjevo, totaling 429 families.

In the meantime, according to the survey, the majority (63.29%) of interviewed households (including 61.82% of male and 66.67% of female respondents) reported having no minors (children under the age of 18), 13.92% of households have one child (including 12.73% of male and 16.67% of female respondents), while households with two minors constitute another 13.92% of the sample (including 14.54% of male and 12.50% of female respondents).

Households three, four and five minors are very limited, and account for 3.8%, 2.53% and 1.27% of the sample respectively. None of the interviewed households had six or more minors. This is all fairly in line with the previous demographic conclusions drawn from the data about the average age and household size. In the meantime, one respondent – 1.27% (1.82% of male respondents) refused to provide information.

The survey data reflects a notable difference from the 2022 census figures, which record families with children separately and do not directly show the number of minor children per household. However, the census does indicate that most families in Ub and Valjevo have one or two children, which may include both minors and adult children. The survey's finding that nearly two-thirds of households have no minors aligns with the area's older average age and the trend of youth outmigration from rural areas.

Despite this, the overall trend is consistent: small families and low numbers of children per household dominate the project area, both in official statistics and in primary data collection. This has important implications for understanding generational dynamics, labour availability, and the design of social mitigation measures.

### **Average Number of Employed Persons per Household**

Census data was reviewed and, while it includes information on registered employment and unemployment by municipality and gender, it does not provide tables showing the number of employed persons per household. In the absence of comparable census data, this section presents findings from the household survey.

According to survey data, a substantial percentage, 51.90% of respondents (including 54.55% of male and 45.83% of female respondents) reported that their household members have no permanent employment and depend exclusively on agricultural activities. This reliance highlights the economic vulnerability of these households, which may face challenges such as market fluctuations, climate conditions, and limited access to alternative income sources.

In addition, only 18.99% of surveyed respondents (including 16.36% of male and 25.00% of female respondents) mentioned that their households have one member with secure, permanent employment. This reinforces the trend of limited workforce participation and emphasizes the role of individual employment within families where agriculture may not be sufficient to meet all household needs.

A total of 16.45% of respondents (including 16.36% of male and 16.67% of female respondents) reported that their households have two employed members, while only 7.59% mentioned that three members of their households have permanent jobs (this includes 7.27% of male and 8.33% of female respondents). Only 3.8% of respondents mentioned that their households include 4 employed members (this includes 3.64% of male and 4.17% of female respondents). This configuration suggests that while some families may achieve more financial stability through multiple earners, they still comprise a minor portion of the overall sample. The presence of multiple earners in these households may provide a buffer against economic hardships but highlights the need for more comprehensive job creation strategies in the broader community. In the meantime, one respondent – 1.27% (1.82% of male respondents) refused to provide information.

It should be noted, that even the households which do have members who are employed on a permanent basis stress that they rely on agricultural activities as a supplementary source of income. A few of the households invest the salaries from their regular employment back into agriculture, making agriculture their primary source of income despite being employed on a permanent basis.

## 1.8.2 Education, Economic Activity, Employment

### Education

According to national census data, secondary education is the most commonly attained level of education, with approximately 53.08% of the population aged 15 and over having completed secondary school. Higher or university education has been attained by 22.44% of the population. Meanwhile, 17.80% of individuals have completed only primary education (eight years), and around 6.28% have not completed primary education or have no formal education at all.<sup>8</sup>

In terms of gender, women tend to have slightly higher educational attainment than men: 24.03% of women aged 15 and over have higher or university-level qualifications, compared to 20.73% of men.

At the regional level, education levels in Šumadija and Western Serbia, where the municipalities of Ub and Valjevo are located, are comparable to national averages. While they may fall slightly below those in major urban centers, the overall trends remain similar. No specific educational data is currently available for the individual project municipalities.

According to statistical data collected during initial survey stage, the educational attainment of the local population breaks down as follows. Of the 16,449 rural citizens in the **Municipality Ub**, 475 (2.90%) are without any formal education, 2,324 (14.13%) have incomplete elementary education, 4,980 (30.27%) have completed their elementary

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<sup>8</sup> <https://publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf>



education, 7.688 (46.74%) have attained their high school diplomas, 351 (2.13%) have gone through higher education and 609 (3.7%) have completed their academic studies. The educational status of 22 citizens is not known.

With regards to **Valjevo**, of the municipalities 22.923 rural citizens, 373 (1.63%) are without any formal education, 3.696 (16.13%) have incomplete elementary education, 6762 (29.5%) have completed their elementary education, 10.270 (44.8%) have attained their high school diplomas, 624 (2.73%) have gone through higher education and 1.150 (5.4%) have completed their academic studies. The educational status of 48 (0.25%) citizens is not known. It is safe to assume that for both municipalities, the educational structure of the citizens living in the affected villages is quite similar to the one outlined here.

Based on census data, 49.37% of the respondents (43.64 % of male and 62.50% of female respondents) have completed their education at elementary school level. Following this, 36.71% of respondents (45.45% of male and 16.67% of female respondents) have completed secondary vocational school. This figure highlights a valuable segment of the population equipped with practical skills that can be applied in the workforce. Vocational training can serve as a critical pathway for employment, especially in sectors relevant to local economic activities, including agriculture and skilled trades.

The data shows that only 7.60% of respondents (5.45% of male and 12.50% of female respondents) have completed high school or grammar school. This low percentage suggests that many individuals do not pursue further academic studies, reflecting barriers to educational advancement or a focus on entering the workforce at an earlier age.

Additionally, just 1.27% of respondents (1.82% of male respondents) have completed higher educational studies through vocational academic programs. This indicates a limited representation of individuals with advanced education, which could constrain the community's ability to attract higher-skilled jobs or projects that require specialized knowledge.

Finally, 3.78% of the surveyed persons has no formal education (this includes 1.82% of male and 8.33% of female respondents). This group consists of elderly participants, who aged out before the primary education became mandatory. This group underscores a critical area for intervention, as lack of education can severely limit access to employment opportunities and resources. In the meantime, one respondent – 1.27% (1.82% of male respondents) refused to provide information.

## **Economic Activity**

According to statistical data collected at the time of initial survey, the Municipality of Ub, located in the Kolubara District of Serbia, has a diverse economic structure that primarily revolves around agriculture. The fertile plains and favourable climate conditions make it an ideal location for farming, where grains such as wheat and corn are staples. Additionally, the municipality is known for its production of various fruits and vegetables, including apples, plums, and tomatoes, which are essential for both local consumption and commercial sale.

Of the 25.780 citizens living in the Municipality of Ub, 9.537 are able to work, and 8.394 of them are employed on various basis, while 1.043 are unemployed, giving the Municipality an unemployment rate of 10.94%, above the state average of 8.68%.

Livestock farming also plays a significant role in the economy, with residents engaged in the production of cattle, pigs, and poultry. This contributes to the local food supply and provides raw materials for small-scale meat processing operations within the municipality.

In terms of industry, Ub has developed a small to medium-sized manufacturing sector. This includes businesses involved in food processing, woodwork, and textiles, which leverage local agricultural outputs and raw materials. The furniture industry, in particular, has seen growth, capitalizing on the region's woodworking capabilities.

Commerce and services are expanding in Ub, reflecting a trend toward increased urbanization and economic diversification. Local markets, grocery stores, and service providers cater to the needs of the growing population, while also attracting customers from surrounding areas. The municipality aims to enhance its retail and service sectors alongside ongoing infrastructure improvements, such as road upgrades and better public transport options, which are critical for supporting economic activity and mobility.

Additionally, local authorities are focusing on promoting entrepreneurship and attracting investments to further stimulate economic growth. This includes initiatives to foster small businesses and improve the business environment, which can lead to job creation and enhanced quality of life for residents.

Overall, the Municipality of Ub is characterized by its agricultural foundations, budding industrial sector, and evolving commercial landscape, with efforts being made to ensure sustainable economic development and improve the resilience of its economy moving forward.

The **Municipality of Valjevo** is a region with a diverse economy that combines agricultural, industrial, and service sectors. This municipality is known for its rich history and beautiful natural landscapes, which also contribute to tourism, an emerging sector in the local economy.

Of the 82.169 citizens living in the Municipality of Valjevo, 36.684 are able to work, and 33.209 of them are employed on various basis, while 1043 are unemployed, giving the Municipality an unemployment rate of 10.94%, above the state average of 8.68%.

Agriculture plays a significant role in the economy of Valjevo. The region is characterized by fertile soil and a favourable climate, which supports the cultivation of various crops, including grains such as corn and wheat, as well as fruits and vegetables. Active farming practices have made Valjevo an important agricultural centre, promoting both subsistence farming and larger-scale commercial agriculture. Livestock farming is also prevalent, with local farmers raising cattle, sheep, and poultry, contributing to the food supply and the regional economy.

In addition to agriculture, Valjevo has a very well-established industrial sector which is still significant, despite years of decline resulting from the transition from self-managed socialism to free market capitalism since the late 80s. The region has traditionally been associated with textile manufacturing, especially in the production of clothing and fabric. There are also facilities involved in the manufacturing of furniture, construction materials, and machinery,

which provide job opportunities and contribute to the overall economic output of the municipality. Additionally, Valjevo has a developed production chain for arms and munitions manufacturing that significantly contributes to the local economy. The presence of small and medium-sized enterprises is significant, fostering innovation and supporting job creation. The service sector in Valjevo has seen considerable growth in recent years, driven in part by the municipality's urban development and increasing population. Retail and local commerce are vital components, with numerous shops, markets, and service-oriented businesses catering to residents and visitors. Additionally, local authorities are working to enhance the tourism sector, capitalizing on Valjevo's natural attractions, historical landmarks, and cultural heritage, aiming to attract more visitors to the area.

According to survey data, in terms of their employment status, most of the interviewed persons are self-employed small landowners (farmers), accounting for 37.98% of the sample (49.09% of male and 12.50% of female respondents), followed by retirees – 29.11% of the sample (25.45% of male and 37.50% of female respondents), 15.19% are permanently employed (10.91% of male and 25.00% of female respondents), 6.33% are employed on a temporary basis (7.27% of male and 4.17% of female respondents) 3.80% are informally employed (3.64% of male and 4.17% of female respondents) and, 2.53% are self-employed in private sector (8.32% of female respondents). In the meantime, 1.26% (4.17% of female respondents) is a housewife and currently unemployed, and no data is available for 3.8% of sample (3.64% of male and 4.17% of female respondents).

**Employment Sector:** Private agriculture accounts for 46.84 % of employment by sector (this includes 54.55% of male and 29.16% of female respondents), again 29.11% are retired (25.45% of male and 37.50% of female respondents), 15.19% are employed in the private sector (10.91% of male and 25.00% of female respondents), and 5.06% in the State sector (7.27% of male respondents). In the meantime, 1.26% (4.17% of female respondents) is currently unemployed, and no data is available for 2.53% of sample (1.82% of male and 4.17% of female respondents).

**Average Monthly Household Income (Estimates):** A notable 46.84% of respondents (40.00% of male respondents and 62.50% of female respondents) chose not to disclose their income, reflecting a cultural tendency in Serbia characterized by distrust towards state and non-state entities, which may affect transparency in economic reporting.

Among those who did share their income details, agriculture emerged as the predominant source of livelihood, with 49.37% identifying it as their primary income source (including 52.73% of male and 41.67% of female respondents). This indicates the community's strong reliance on agriculture, which is likely tied to the local economy and cultural practices. Additionally, 20.25% of respondents indicated that pensions were their main source of income (including 20.00% of male and 20.83% of female respondents), while 26.58% cited salaries (including 25.45% of male and 29.17% of female respondents). Notably, within the salary earners, half reported relying on agriculture as a necessary secondary income source, suggesting a dual-income strategy to ensure economic stability. In addition, 3.80% of respondents (including 1.82% of male and 8.33% of female respondents) reported that they rely on informal earnings.

The distribution of monthly income among respondents who provided information shows a diverse range of economic circumstances. A small percentage, 8.86% (5.45% of male and 16.66% of female respondents), reported earning less than 50,000 RSD, indicating some

households may struggle to meet basic needs. The households with monthly income from 50,000 to 100,000 RSD comprise 12.66% (including 14.55% of male and 8.33% of female respondents), while households earning 150,000 to 200,000 RSD account for 11.39% of respondents (including 16.36% of male respondents), reflecting a significant portion of the population residing within the lower-middle income bracket. Higher income levels, such as 200,000 to 250,000 RSD accounted for 8.86% (each including 10.91% of male and 4.17% of female respondents), while those earning more than 250,000 RSD (2.53%), were reported by fewer individuals (including 1.82% of male and 4.17% of female respondents).

It should be emphasized that in all cases where agriculture was cited as the main source of income and in most cases where it was cited as a supplementary source of income, reported incomes may vary significantly from year to year. Due to poor mechanisation and reliance on traditional agricultural knowhow, as well as a severe lack of investment into other agricultural means of production, crop yields vary significantly, when crops are exposed to the increasingly unpredictable elements and other external stressors. Therefore, someone may earn 200.000 RSD in one year, attempt to expand their production by investing 300.000 RSD the next, only to lose them all because of a random drought, and lack of irrigation.

**Daily Transportation Vehicles:** Most of the PAPs, 81.01% of them, reported having vehicles to meet their daily transportation needs, which indicates a strong reliance on personal mobility for work, access to markets, and other essential activities (including 83.64% of male and 75.00% of female respondents).

Most of vehicles are over 5 years old. A total of 25.32% of the vehicles are between 10 and 15 years (this includes 23.64% of male and 29.17% of female respondents), another 25.32% of vehicles are between 15 and 20 years (this includes 32.73% of male and 8.33% of female respondents), while 22.87% are over 20 years (this includes 21.82% of male and 25.00% of female respondents). This indicates potentially less reliable transportation options with higher maintenance costs. Only 7.59% of vehicles are between 5 to 10 years (this includes 5.45% of male and 12.50% of female respondents),

On the other hand, the 18.99% of respondents (including 16.36% of male and 25.00% of female respondents), are without vehicles and face significant challenges in terms of mobility, which could affect their access to employment opportunities, healthcare, and other essential services. Even access to local shops is quite limited due to the fact that the villages are in fact clusters of scattered hamlets, with dirt or semi paved roads connecting them to each other and the village “centre”.

**Agricultural Vehicle/Equipment:** A total of 18.99% of respondents (12.73% of male and 33.33% if female respondents) refused to provide information on their agricultural equipment and machinery. Vast majority (81.01% of interviewed respondents (including 87.27% of male and 66.67% of female respondents) reported that they own a tractor, which in case of 79.45% of respondents (including 85.46% of male and 66.67% of female respondents) is equipped with a plough, however, the fact that all tractors are over 20 years old, and most are in poor condition severely hampers agricultural productivity. This outdated equipment limits operational efficiency and increases costs, directly impacting the economic stability of the households reliant on farming.

The available equipment further underscores the poor state of the agricultural means of production that the PAPs possess. Among the tractors, 65.82% are equipped with seeders for planting (this includes 72.73% of male and 50.00% of female respondents), and 51.90% have

disc harrows for soil preparation (this includes 56.36% of male and 45.83% of female respondents). While this diversity of tools supports essential farming tasks, reliance on aging machinery poses significant barriers to effective agricultural practices.

Additionally, 8.86% have balers (this includes 10.91% of male and 4.17% of female respondents), 22.78% possess sprinklers for irrigation (this includes 25.46% of male and 25.00% of female respondents), 32.91% own tillers (this includes 32.73% of male and 33.33% of female respondents), and 18.99% have mowers or brush cutters (this includes 23.63% of male and 8.33% of female respondents), showing an investment in agricultural operations, albeit with the limitations imposed by their condition. Importantly, 22.78% of households own combines, which are crucial for harvesting larger fields efficiently (this includes 29.09% of male and 8.33% of female respondents).

In summary, while the community demonstrates a solid agricultural foundation through tractor ownership and various implements, the old age and poor condition of this equipment present serious challenges.

**Need for Special Healthcare:** A total of 8.86% of the households have members who need frequent or special healthcare needs (self-reported). This includes 5.46% of male and 16.67% of female respondents. Key reasons of special care include old age, medical conditions and one case of disability.

**Care for Non-Household Members:** None of the PAPs reported caring for non-household members.

**Agricultural Practices and Irrigation system:** The agricultural production in the area is mostly small scale production using predominantly traditional methods of agricultural production. When asked about the methods they used and the sources of knowledge regarding agriculture, 41.77% of responders noted that they only gained the knowledge from their parents or continue to do so (this includes 38.18% of male and 50.00% of female respondents). A total of 8.86 % of respondents indicated that they acquire knowledge only from other small landholders, suggesting a strong sense of community and collaboration among local farmers (this includes 17.23% of male respondents). This peer-to-peer learning plays a vital role in sharing practical, localized agricultural techniques and solutions.

Only a small percentage, 2.53% of interviewed PAPs indicated only social media, digital media or print media as sources for expanding the knowledge (this includes 3.64% of male respondents). Significant number of PAPs (39.24%) reported use of all above sources of information (this includes 38.18% of male and 41.67% of female respondents) In the meantime, no data was provided by 6 respondents (7.60%), 2 of which are not engaged in agricultural activities.

The overwhelming majority of the interviewed PAPs, 89.87% of them, stated that they were not aware of any irrigation aspects of the Project (this includes 89.09% of male and 91.67% of female respondents), while 10.13% said that they had heard something along those lines, but were not sure what the Project entailed when it comes to irrigation (this includes 10.91% of male and 8.33% of female respondents). However most of them (67.09%) recognised the potential benefit of being connected to the irrigation network, stating that they would be interested to connect (this includes 74.55% of male and 50.00% of female respondents).

The analysis of current irrigation sources among PAPs reveals significant reliance on traditional water extraction methods:

- A substantial 68.35% of respondents indicated that they currently use wells as their primary source of water for irrigation (this includes 69.09% of male and 66.67% of female respondents). This reliance on groundwater underscores the importance of well systems in supporting local agricultural practices. One of the causes for concern for the local communities is the impact the Project could have on the stability of ground water levels
- 3.80% noted that they utilize local bodies of water for irrigation (this includes 5.45% of male respondents).
- 10.12% mentioned transporting water from a separate location using cisterns or other means, which indicates additional logistical challenges and costs associated with accessing irrigation water (this includes 7.27% of male and 16.67% of female respondents).
- Finally, 17.72% of respondents stated that they have no need for irrigation, potentially reflecting either a lack of cultivation requiring irrigation or specific agricultural practices that do not rely on water management (this includes 18.18% of male and 16.67% of female respondents).

The responses regarding concerns related to the irrigation system highlight the following:

- 27.85% of respondents expressed concern about the price of the utility connection point between their properties and the irrigation system (this includes 30.91% of male and 20.83% of female respondents). This indicates a prevalent worry regarding the potential financial burden of connecting to the irrigation infrastructure.
- 18.99% of respondents voiced concerns about the ongoing monthly costs associated with using the irrigation system (this includes 20.00% of male and 16.67% of female respondents). This suggests that, beyond initial connection fees, there is apprehension about the long-term affordability of maintaining access to the irrigation resources.
- A smaller portion of 2.53% noted concerns that the irrigation system might increase the price of land, reflecting anxiety that enhancements to irrigation could inadvertently affect land market dynamics negatively (this includes 3.63% of male respondents).
- A total of 5.06% indicated worries about the health quality of the water used in the irrigation system, highlighting the importance of safe and reliable water sources for agricultural activities and food safety (this includes 7.27% of male respondents).
- 43.04% of respondents reported no concerns whatsoever regarding the irrigation system, which indicates that a notable segment of the community may view the system positively or remain indifferent to potential issues (this includes 34.55% of male and 62.50% of female respondents).
- In the meantime, 2.53% of respondents (including 3.64 % of male respondents) is not interested in connecting to irrigation system.

**Poverty and Social Inequality:** According to the publicly available data on Poverty and Social Inequality for 2024<sup>9</sup>, relative poverty line was set as an average of 35 606 RSD per month for a single person household, 64 091 RSD per month for a household with two adults and one child aged below 14, while for a four-member household with two adults and two children aged below 14, it amounted to 74 773 RSD.

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<sup>9</sup> /<https://www.eapn.eu/wp-content/uploads/2024/10/eapn-Poverty-Watch-Serbia-2024-6016.pdf>



Defined as a share of persons whose equivalised disposable income is below the set relative poverty line (60% of median income), the at-risk-of-poverty rate in 2024 was 19.7%. Data shows predominant poverty risks for the individuals aged 65 and over (23.6%), as well as for the households composed of one adult 65 years or over (36.9%).

Among the interviewed households, only one respondent reported income below the above-mentioned thresholds—a household of four members with a monthly income below 50,000 RSD, amounting to up to 12,500 RSD per month per household member (female respondent).

It should be noted that, by Serbian legislative framework, assessment of the relative risk of poverty is not directly linked to the social assistance allocation system which is allocated based on other criteria, such as person's income and property census and the number of household members. The basic condition for obtaining the right to social welfare assistance is that the individual or family has a monthly income lower than the amount of social assistance and is paid under the principle of supplements to this amount. For the year 2025 social assistance amount was set at 12.181 RSD per person. Other eligibility criteria include the condition that the individual or household members do not own other real estate except for residential space that meets their needs (one room per household member, or two rooms for persons receiving care allowance) and land up to 0.5 hectares (for individuals unable to work and families where all members are unable to work, this limit is one hectare), or that they do not own movable property that, through its use or sale, without jeopardizing basic living needs, can provide them with funds equivalent to six times the monthly amount of social assistance. In the meantime, according to survey results, none of the respondents reported about receiving social assistance.

### **Assets**

Following the findings of the desktop analysis and results of the survey, we can identify groups of PAPs that are considered to have limited capacity to absorb the negative impacts of the project and are as such defined as possible vulnerable groups among the PAPs: 1) elderly households; 2) single person households; 3) women headed households; 4) households with members with disabilities; 5) people below poverty line.

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 document will be updated based on the additional findings.

## **1.9 Impact Assessment and Mitigation (including all project phases, pre-construction, construction, operation, decommissioning)**

The Pambukovica Dam Project has the potential to significantly influence the social landscape of the surrounding communities. The Social Impact Assessment, which focuses on identifying, evaluating, and addressing the social impacts associated with the project examines a range of social factors, including local livelihoods, health and safety, and community cohesion. Based on the social-baseline data, the assessment highlights how the project may alter social dynamics and affect the well-being of residents. Key areas of focus include the impact on employment opportunities, the potential for displacement and land acquisition, and the effects on vulnerable groups.

**Table 8 - Impact Assessment Table**

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Construction nuisances	Drop in air quality and noise pollution stemming from construction activities	Local communities	Minor	Moderate	Minor	Implement dust control measures; monitor air quality regularly; use low-emission machinery; enforce noise control regulations; limit construction hours; use noise barriers and soundproof equipment; engage with the community to address concerns and implement mitigation measures.	Negligible
Disruption of local businesses, agriculture, and traditional livelihoods.	Loss of land causing shifts in the livelihood sources from traditional agricultural and influx of money to the local market (from compensation, employment opportunities, additional spending by influx workforce) and training and reskilling opportunities	Local communities	Minor	Moderate	Minor	Implement job training and reskilling programs tailored to the affected population. Provide financial support and microfinance options for starting new businesses. Create employment opportunities within the project, prioritizing affected individuals. Develop a comprehensive plan to support the transition to alternative livelihoods, such as agri-business.	Negligible
Displacement	Potential economic displacement (no physical displacement as of current data).  Loss of income due to inability to continue agricultural production, loss of grazing areas for livestock.	PAPs with direct impacts of land expropriation	Major	Moderate	High	Consider alternative project designs to be investigated to prevent impact on one residential house. LRP to be prepared to address the livelihood impacts of PAPs located in reservoir inundation zone (Phase 1).  Provide training and reskilling programs; support agri-business and small enterprise development; prioritize local hiring; offer financial and advisory services for livelihood transition.	Minor
Loss of access to agricultural land, to roads	Construction works may disrupt access to	Farmers, local community	Minor	Moderate	Moderate	Ensure alternative access routes; clearly mark work zones; provide temporary paths or crossings; consult community on the	Negligible

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
and riverine zone	farmlands, irrigation sources, or village roads					<p>most suitable alternatives for the disrupted services and amenities; communicate restrictions in advance.</p> <p>GRM to be established to allow PAPs to raise their questions and concerns.</p> <p>Restore to the extent possible any public infrastructure or amenities that is disrupted.</p>	
Impacts on vulnerable households	Elderly, women-headed, or poor households may face more difficulty coping with changes or engaging with the project	Vulnerable groups	Minor	Moderate	Moderate	Collect additional data through targeted surveys and focus group discussions, and reflect findings in LRP; Provide targeted outreach and support; prioritize access to compensation, employment, and information.	Negligible to Minor
Lack of information or exclusion from engagement	Elderly and low-educated residents may be excluded due to communication barriers.	Older residents, low-literacy individuals	Minor	Moderate	Minor	Carry out consultations, inform PAPs (especially elderly and low-educated) on dates and locations of consultation in advance; share simple and visual materials during consultations; provide contacts for GRM; involve community facilitators (if needed)	Negligible
Limited awareness of irrigation system and affordability concerns related to irrigation	<p>Many farmers unaware of irrigation details or concerned about costs</p> <p>Risk of groundwater level decline (many local farmers use wells as their primary source of irrigation water)</p>	Farmers, local community members engaged/interested in agricultural activity	Minor	Moderate	Moderate	<p>Conduct irrigation awareness campaign; clarify tariff structure; consider possibility of phased or subsidized connection fees</p> <p>Consider introduction of participatory well monitoring as a mitigation/enhancement measure.</p>	Negligible
Positive Impact:	The Project intended functions is flood protection, irrigation,	Wider community	Major	Major	Major	Areas suitably situated to receive water for irrigation will not only help the local communities in sustaining food production	Positive

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Completion of the Project	<p>maintaining of ecological flow, and retention of sediments in phase 1, and irrigation system in phase 2.</p> <p>The standard of living of the beneficiary residents will improve such as to include income generation and productivity.</p>					but also all the residents of the neighbouring districts in food supply. It is proposed that farmers will be provided with support and access to government and agricultural grant programs (e.g. IPARD)	
Positive Impact: Completion of the Project	<p>Increased tourism and recreational activities.</p> <p>Upgrading of certain roads, necessary for the construction and maintenance of the dam, will also contribute to a better transport and travel networks in the area.</p> <p>The dam will also moderate the micro-climatic conditions of the immediate surrounding areas through increased humidity and/or cooling effects to the comfort of the residents and visitors.</p>	Local communities	Minor	Minor	Minor	N/A	Positive
Positive Impact: Property values	The communities downstream of the Project may see their	Wider community	Minor	Moderate	Minor		Positive

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
increase in downstream settlements	property values increase as a benefit from flood protection (phase 1) and irrigation system (phase 2)						

## 2. Labour and working conditions

### 2.1 Introduction and Purpose

This chapter includes the overview of the potential labour relates impacts from the Project, both from the aspects of added benefits from temporary and permanent job creation for the local communities, as well as potential impacts from influx of the external workforce on the local communities. Risks associated with management of labour and working conditions particularly during the construction stage are also considered and next steps outlined in the proposed mitigation measures.

### 2.2 Legislation and Standards

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 has been identified and listed based on the Project scale, nature, and the agreed-upon scope of the Project assessment.

#### 2.2.1 National legislation

Below is selection of main national legislation relevant to the topic of labour management in Serbia, which will be considered for this Assignment:

- 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 Occupational Safety and Health. (Official Gazette of RS, No. 35/2023)
- The Act on the Prohibition of Discrimination (Official Gazette of RS, No. 22/2009 and 52/2021)
- Law on Gender Equality (Official Gazette of the RS No. 52/2021)
- Law on the Prevention of Harassment at Work (Official Gazette of the RS No. 36/10)
- Law on Preventing Discrimination Against Persons with Disabilities (Official Gazette of the RS No. 33/2006, 13/2016)
- 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 Amicable Resolution of Labour Disputes (Official Gazette of the RS No. 125/2004, 104/2009, 50/2018)

Also listed is the legislation demonstrating a wider legal framework in Serbia which includes elements of labour management and planning relevant to individual projects.

- Law on the Planning System of the Republic of Serbia. (Official Gazette of RS, No. 30/2018)
- 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 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)
- The 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)



- 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 Content of the Environmental Impact Assessment Study (Official Gazette of RS, No. 69/05);

Document	Description
The Labour Law (“Official Gazette of RS”, No. 24/2005, 61/2005, 21/2013, 75/2014, 13/2017, 113/2017 and 95/2018) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/24/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/24/1/reg</a>	This law regulates the rights, obligations, and responsibilities arising from employment or work.
<b>Law on Occupational Safety and Health</b> (“Official Gazette of RS”, No. 35/2023) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2023/35/2">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2023/35/2</a>	This law regulates the improvement and implementation of occupational safety and health measures for individuals participating in work processes, as well as individuals present in the work environment, to prevent work-related injuries, occupational diseases, and work-related illnesses.
The Act on the Prohibition of Discrimination (“Official Gazette of RS”, No. 22/2009 and 52/2021) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/22/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/22/1/reg</a>	This law regulates the general prohibition of discrimination, the forms and cases of discrimination, as well as the procedures for protection against discrimination.
<b>Law on Gender Equality</b> (“Official Gazette of the RS”, No. 52/2021”) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2021/52/3/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2021/52/3/reg</a>	This law regulates the concept, significance, and measures of policies for achieving and improving gender equality, types of planning documents in the field of gender equality and the method of reporting on their implementation, the institutional framework for achieving gender equality, supervision over the application of the law, and other issues of importance for achieving and improving gender equality.
<b>Law on Preventing Discrimination Against Persons with Disabilities</b> (“Official Gazette of the RS”, No. 33/2006, 13/2016) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2006/33/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2006/33/1/reg</a>	This law regulates the general regime of prohibition of discrimination based on disability, specific cases of discrimination against persons with disabilities, the procedure for protecting persons exposed to discrimination, and measures taken to promote equality and social inclusion of persons with disabilities.
<b>Law of Contracts and Torts</b> (“Official Gazette of the RS”, No. 29/78, 38/85, 45/89, 57/89, 31/93, 1/2003, 18/2020) <a href="https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1978/29/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1978/29/1/reg</a>	This law deals with mandatory legal relationships arising from contracts, torts, unjust enrichment, unauthorized management, unilateral declarations of intent, and other facts specified by law.
<b>Law on Amicable Resolution of Labour Disputes</b> (“Official Gazette of the RS No. 125/2004, 104/2009, 50/2018”) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/125/6/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/125/6/reg</a>	This law regulates the manner and procedure for the peaceful resolution of collective and individual labour disputes, the selection, rights, and obligations of mediators and arbitrators, and other issues of importance for the peaceful resolution of labour disputes.
The Law on the Planning System of the Republic of Serbia (“Official Gazette of RS”, No. 30/2018) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg</a>	This law regulates the planning system of the Republic of Serbia, including the management of the public policy system and medium-term planning. It defines the types and contents of

Document	Description
	planning documents that all participants in the planning system propose, adopt, and implement according to their competencies. It also addresses the mutual alignment of planning documents, the procedure for determining and implementing public policies, the obligation to report on the implementation of planning documents, and the corresponding application of the obligation to conduct impact analyses on regulations and evaluate the effects of these regulations.
Law on Strategic Environmental Impact Assessment ("Official Gazette of the Republic of Serbia", No. 94/2024) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg</a>	This law regulates the conditions, methods, and procedures for assessing the impact of certain plans and programs on the environment (strategic assessment), aiming to protect the environment and promote sustainable development by integrating fundamental principles of environmental protection into the process of preparing and adopting plans and programs.
The Environmental Impact Assessment Law ("Official Gazette of the Republic of Serbia", No. 135/2004 and 36/2009) <a href="https://pravno-informacioni-sistem.rs/viewAct/f80f0a5d-e212-4bb3-9efc-7eeee2786437">https://pravno-informacioni-sistem.rs/viewAct/f80f0a5d-e212-4bb3-9efc-7eeee2786437</a>	This law regulates the conditions, manner, and procedure for assessing the impact of certain plans, programs, and projects on the environment. Additionally, it governs the scope and content of spatial, urban planning, and technical documentation.
The Law on Planning and Construction ("Official Gazette of the Republic of Serbia", No. 72/2009, 81/2009 - corr., 64/2010 - decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 - decision of the Constitutional Court, 50/2013 - decision of the Constitutional Court, 98/2013 - decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg</a>	This law regulates the conditions and manner of spatial planning, development, and use of construction land and facilities, supervision over the implementation of the provisions of this law and inspection supervision, as well as other important issues related to spatial planning, development, and use of construction land and facilities. It should also be noted that according to Article 134a of this law, an investor investing in the construction of linear infrastructure facilities of special significance for the Republic of Serbia is obliged to provide the owner of a residential building constructed before the spatial plan designating the land for public purposes came into force, with another suitable residential building or apartment, regardless of whether proceedings for the legalization of that building have been initiated, or to pay them monetary compensation in the amount necessary to provide another suitable residential building or apartment.
The 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) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg</a>	This regulation specifies the methodology for managing public policies in detail, particularly the scope, process, and control of impact analysis during the creation of public policy documents, as well as the analysis of impacts after their adoption. It includes the procedures for conducting consultations and public discussions on public policy documents, the content and form of public policy documents,

Document	Description
	the elements of impact analysis of adopted public policy documents, the method of reporting on the results of public policy implementation, the method of evaluating public policy effects, and the areas of planning and implementing public policies.
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") <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg</a>	This rulebook specifies in detail the content, method, and procedure for drafting spatial and urban planning documents.
The Rulebook on the Content of the Environmental Impact Assessment Study ("Official Gazette of RS", No. 69/05) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg</a>	This rulebook specifies in detail the content of the request for deciding the need for an impact assessment and the content of the request for determining the scope and content of the environmental impact assessment study.

### 2.2.2 EBRD Requirements

EBRD E&S Performance Requirements relevant to labour management

- PR1 - Assessment and Management of Environmental and Social Impacts and Issues;
- PR2 - Labor and Working conditions;
- PR4 – Health, Safety and Security;
- PR10 - Information Disclosure and Stakeholder Engagement.

### 2.2.3 Regional and global standards and requirements

Following regional and global standards and requirements will be taken into consideration as part of the Project assessment:

- 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;
- National obligations under international law (including the Espoo Convention)
- ILO core labour conventions, as transposed into national legislation;
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines;
- EBRD Paris Agreement alignment methodology
- EU Working Time Directive 2003/88/EC of the European Parliament and of the Council of 4 November 2003 concerning certain aspects of the organisation of working time
- Fixed-Term Work Directive<sup>5</sup> (1999) - Council Directive 1999/70/EC of 28 June 1999 concerning the framework agreement on fixed-term work
- Part-Time Work Directive<sup>4</sup> (1997) - Council Directive 97/81/EC of 15 December 1997 concerning the Framework Agreement on part-time work
- Temporary Agency Workers Directive<sup>7</sup> (2008) – Directive 2008/104/EC of the European Parliament and of the Council of 19 November 2008 on temporary agency work
- Transparent and Predictable Working Conditions Directive<sup>8</sup> (2019) - Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union
- Work-Life Balance Directive<sup>9</sup> (2019)- Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive 2010/18/EU

- Regulation (EU) 2024/3015 of the European Parliament and of the Council of 27 November 2024 on prohibiting products made with forced labour on the Union market and amending Directive (EU) 2019/1937
- 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

## **2.3 Methodology**

An impact assessment has been conducted based on available documents, including the Environmental Impact Assessment (EIA), Project for a Building Permit, and Spatial Plans, as well as the characteristics of the project and the study area. The assessment relied on a review of secondary data sources, including project documentation, publicly available information regarding the local and regional labour market and applicable legislation and standards relevant to labour management. The assessment was conducted in line with the overall methodology for the ESIA as presented in BOOK 1 Introduction.

Impacts have been assessed for the construction, operation and decommissioning phases, as labour management impacts during pre-construction phase are considered negligible. The impacts associated with construction and decommissioning phase are considered as quite similar, with the main differences being in the structure or expertise of the required workforce. The impact assessment for the construction and decommissioning phases includes consideration of direct and indirect labour requirements, i.e. assessment of the workforce scope and structure for construction activities as well as overall demand for the workforce for support services.

The findings of the impact assessment will serve as a basis for defining mitigation measures and identifying any residual negative impacts where full mitigation is not feasible.

## **2.4 Assumptions and limitations (if applicable)**

The requirements for the workforce were assumed using similar dam projects as benchmarks as there is currently no workforce plan developed for the project.

Assumptions were also made on the potential contractors strategy regarding workforce sourcing – in recent years due to the limited availability of skilled labour in Serbia and great number of ongoing projects, it has not been uncommon for the contractors to supplement the workforce with migrant and foreign workers and provide housing for them locally.

## **2.5 Baseline**

For the assessment of the labour market for the Project we have considered the Municipalities directly impacted by the Project – Ub, Valjevo and Koceljeva for Phase 1 and Obrenovac for Phase 2, as well as the two nearby municipalities Lajkovac and Lazarevac. The overview of

the population with regards to the labour market is presented in the Table 9 - Labour structure of affected municipalities below.<sup>10</sup>

**Table 9 - Labour structure of affected municipalities**

	Population	Gender		Labour structure		Employment	
	Total no of persons	Male	Female	Working age (18-65)	Age of dependency (<18 and >65)	Employed	As a % of working age population
<b>Ub</b>	25,780	13,022	12,758	15,539	10,241	8,333	54%
<b>Valjevo</b>	82,169	39,915	42,254	49,960	32,209	31,765	64%
<b>Koceljeva</b>	11,148	5,766	5,382	6,799	4,349	3,551	52%
<b>Obrenovac</b>	68,882	33,816	35,066	41,839	27,043	27,049	65%
<b>Lajkovac</b>	13,825	6,954	6,871	8,286	5,539	4,958	60%
<b>Lazarevac</b>	55,146	26,941	28,205	33,965	21,181	24,025	71%
<b>TOTAL</b>	<b>256,950</b>	<b>126,414</b>	<b>211,678</b>	<b>156,388</b>	<b>100,562</b>	<b>99,681</b>	<b>-</b>

The table above seems to indicate availability of the local labour market to accommodate the requirements of the Project, however further examination shows that the available workforce might not be suitable to support the project requirements. Majority of the available workforce would not have the right skills or experience required for the implementation of a dam project.

Across these municipalities, the construction sector is influenced by national trends, including investments in infrastructure and residential projects. The Serbian government has been actively supporting the sector through subsidies and loans, aiming to boost economic development. However, challenges such as labour shortages and financial constraints are impacting the overall growth and stability of the sector. The construction sector in Ub has seen a steady demand for skilled labour, driven by ongoing infrastructure projects and residential developments. The sector remains a significant contributor to local employment, with various projects aimed at improving transportation and housing. Valjevo's construction sector is characterized by a mix of residential, commercial, and infrastructure projects. The municipality has experienced growth in construction activities, with the demand for construction workers remains strong, particularly for skilled labour in civil engineering and building construction.

More locally, focussing on the cadastre municipalities directly impacted by the project, the results of the survey of the affected cadastre municipalities indicate that the employment was largely cantered around agriculture, with 49.36% of respondents reported that their households are relying on it as their main income source (this includes 52.73% of all male and 41.67% of all female respondents), and another 11.39% noting agriculture as a second largest source of income for the household (part of those who are either currently employed or retired). Formal education levels are generally low, primarily at the elementary and vocational school levels.

<sup>10</sup> Statistical Office of the Republic of Serbia, Statistical Release, Registered employment. Available at: <https://stat.gov.rs/en-us/vesti/statisticalrelease/?p=13716>

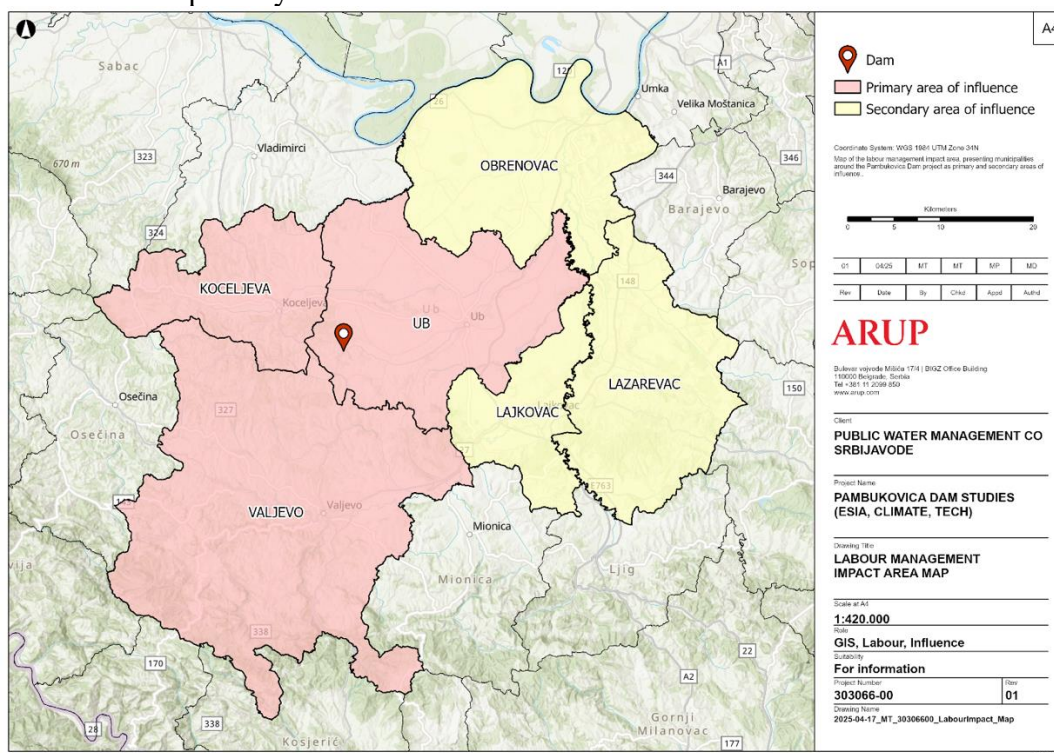


**Table 10 - Sources of income among the surveyed (who are employed and provided the answer)**

Source of income	Percentage of Respondents	Percentage of all Male Respondents	Percentage of all Female Respondents
Agriculture	37.98%	49.09%	12.50%
Pensions	29.11%	25.45%	37.50%
Permanent Employment	15.19%	10.91%	25.00%
Temporary Employment	6.33%	7.27%	4.17%
Informal Means	3.80%	3.64%	4.17%
Self-employed in Private Sector	2.53%	0%	8.33%

## 2.6 Receptors and Area of Influence

The majority of the local workforce eligible for the Project is expected to be drawn from the municipalities highlighted on the map below. The primary area of influence includes the three municipalities directly affected by the Project, while the secondary area comprises neighbouring municipalities that are within a reasonable commuting distance. These secondary municipalities also tend to have a higher proportion of skilled workers compared to those in the primary area.



**Figure 6 - Area of Influence - labour**

This area indicated the communities who could benefit from an increased demand in job opportunities during the construction phase of the project, either directly or through supporting services.



## 2.7 Project Activities and Identification of Impacts

### 2.7.1 Pre-Construction

During the pre-construction phase the requirements for labour are limited to design and surveying activities which are unlikely to impact the local labour market significantly.

### 2.7.2 Construction

For an infrastructure project like a dam the structure of the labour market would involve several categories:

- Skilled Labour like civil engineers, construction managers and surveyors, specialised construction workers and machine operators
- Unskilled Labour including construction workers/general labourers for tasks such as excavation, concrete pouring, and assembly,
- Specialised Roles like hydrologists and geologists, environmental specialists, dam safety specialists, etc.
- Support Services like logistics and supply chain

Safety Inspectors: To maintain safety standards and protocols on-site.

The local workforce in these municipalities would likely be supplemented by workers from other regions due to the specialised nature of dam construction. However, local employment opportunities would be significant, particularly for unskilled labour and support services.

Additionally, there would be a need for training programs to upskill local workers, particularly in areas like machine operation and safety protocols.

Such a project would likely boost local employment rates and stimulate economic activity in the region, providing long-term benefits beyond the construction phase.

### Estimated Workforce Requirements

Over the full lifecycle of the construction stage of the Project, the cumulative workforce is estimated to be between 500–700 individual workers, accounting for turnover and project phase changes. These workers would not be engaged on the project at all times and the peak period, most likely in the second year of construction is expected to reach 350-400 workers on site. Based on the assessment of the local workforce, the breakdown of the workforce could be:

~50–60% local workforce potential (if trained or upskilled)

~40–50% external skilled workers (esp. for technical/mechanical tasks)

**Table 11 - Estimated workforce during construction stage**

Phase	Duration	Estimated Workers	Main skills needed
Site prep & access roads	6–9 months	100-150	Heavy equipment operators, general labour, civil works
River diversion, foundation prep	6–9 months	150-200	Earthworks, structural steel, concrete work
Main embankment construction	12–18 months	300–400 (peak)	Earthmoving, compaction, survey, QA/QC

Phase	Duration	Estimated Workers	Main skills needed
<b>Spillway, intake, outlet works</b>	12 months	150-200	Skilled civil workers, steel/concrete specialists
<b>Electromechanical installation</b>	6 months	50–100	Technicians, electrical and mechanical engineers
<b>Landscaping, testing, handover</b>	6 months	50–80	General labour, environmental monitoring

In addition, the project would have secondary benefits, with the increased demand in adjacent sectors like transport, retail, maintenance, catering and accommodation.

Identified impacts during construction phase include:

**Increased Demand for Labour** - The construction phase will likely lead to a surge in demand for both skilled and unskilled workers, particularly in civil engineering, heavy machinery operation, logistics, and support services. This can temporarily reduce local unemployment and provide employment opportunities for workers in construction, transport, security, catering, and accommodation.

**In-migration of Workers** - If the local workforce cannot meet demand, workers from other regions may migrate temporarily, potentially increasing pressure on housing and local infrastructure. This could lead to both economic opportunities (rental income, service jobs) and social challenges (integration, temporary overpopulation, additional stress on public services).

**Training and Upskilling Opportunities** - There may be investments in training local workers, especially in collaboration with vocational schools in Valjevo or nearby towns. This could lead to long-term improvements in workforce qualifications.

### 2.7.3 Operation

This phase is unlikely to generate significant impacts on the labour market. It is estimated that during this phase there would be a requirement for 10–20 full-time positions engaged in dam operation, maintenance, environmental compliance, and security.

However, this phase is more likely to have a greater impact on the overall ability to maintain agricultural production for the owners of the land which has been expropriated for the dam and the reservoir.

Identified impacts during operation phase include:

**Permanent Employment Opportunities** - Once operational, the dam will create a smaller number of permanent jobs in maintenance, reservoir management, environmental monitoring, and administrative roles. Opportunities may arise for local contractors in ongoing maintenance and services.

**Agricultural and Land Use Displacement** – Due to agricultural land being flooded or access restricted due to the reservoir, some households may lose farming jobs or need to shift to alternative employment sectors.

**Boost to Related Sectors** - Improved water management will benefit agriculture downstream, creating new jobs in irrigation-intensive farming or fishery. There may be increased interest in tourism or recreation around the reservoir, leading to employment in hospitality, guiding, or leisure services.

#### 2.7.4 Decommissioning

Decommissioning activities are expected to involve site restoration, including the dismantling of temporary structures and restoring areas used for construction facilities. These activities could generate demand for local labour both for skilled and unskilled labour, as part of the demolition activities and waste disposal. The requirements for workforce greatly depend on the adopted timeline for the decommissioning stage, which is unknown at this stage of the project.

### 2.8 Impact Assessment and Mitigation (including all project phases, pre-construction, construction, operation, decommissioning)

The Serbian national labour legislation is greatly aligned with EBRD PR2. The Project related risks are predominantly identified for the construction stage linked to the influx of the workforce and the management of labour and working conditions.

The Project will create some employment opportunities during construction, with a view of maximising local employment to the extent possible. Benefits at the local level will also be felt from the creation of indirect employment, arising from the Project's procurement of goods and services. The implementation of good practice measures may increase these benefits for the local population.

During operation, Project related opportunities in these areas will be negligible.

#### 2.8.1 Construction Phase

Skilled and semi-skilled labour is likely to be sourced nationally and/or internationally, while unskilled labour will mostly come from the local area, depending on availability of workers. Priority will be given to residents from the communities near the project site, though the available workforce in these areas is likely limited, due to the age and skill level of the local population.

The Serbian national labour legislation is generally aligned with EBRD PR2; however, several gaps and enforcement weaknesses remain. While the legal framework covers most core requirements, compliance is often limited due to insufficient monitoring and weak enforcement mechanisms. Labour inspection does not monitor the implementation of law on site, but conducts audits, typically in high-risk cases or in case of submitted claims of misconduct. Identified gaps include: (i) lack of written contracts for seasonal workers hired for less than 120 days; (ii) absence of a legal definition of forced labour; (iii) restrictions on trade union formation; (iv) limited anti-harassment provisions; (v) weak provisions on collective dismissals; and (vi) absence of protection mechanisms for foreign seconded workers.

The risks associated to child labour are negligible. The protections within the law are quite strong and the local culture does not support environments where child labour could be exploited.

The contractor is not chosen at this time, however, due to the limited capacity in the construction labour market in Serbia, the contractor's workforce is likely to include a substantial number of international workers. Although Serbian law grants international workers and migrants the same legal rights and protections under the labour law as Serbian citizens, there have been instances on non-compliance, particularly involving foreign Contractors, and evidence of mistreatments and forced labour were recorded. Specific concerns include forced labour, wage violations, poor working and living conditions, and lack of effective legal recourse. Notably, seconded foreign workers are not covered by the Labour Code or national labour inspections, and only occupational health and safety rules apply to them (EC, 2022). Given these risks, the impacts on the international workforce are therefore estimated to have major magnitude with high sensitivity of the receptors.

Employment benefits will mainly be felt by the locals employed and their households. The short-term nature of the employment (limited to the construction phase) further reduces the significance of the impact. Drawing from experience with similar projects in Serbia and other regions, and the nature of works, the participation of women in the construction workforce is expected to be minimal, mostly in supporting roles, like administration, catering, cleaning, and hospitality. Participation in skilled workforce (engineering and consultants) is more likely to allow for a more gender-balanced work environment.

Given the importance of employment opportunities to local residents, the sensitivity of the local population to this aspect is considered moderate. While the number of beneficiaries may be relatively small and the duration of employment is limited to the construction phase, the impact on participating households can be meaningful. Therefore, the benefits of direct employment are assessed as moderate, with a positive residual impact that may extend beyond the construction phase through improved skills, income, and experience.

Indirect employment will arise from the Project's procurement of goods and services, as well as from the spending of project employees in local communities. Past experience with large infrastructure projects in Serbia and elsewhere suggests that employment of non-locals and the increased spending of local workers can benefit local communities, especially through spending in local businesses like shops, bars, restaurants, and local businesses providing accommodation. The sensitivity of the local population remains medium, given the importance of any economic activity in the region. Thus, the benefits from indirect employment are assessed as minor, with negligible residual impact after end of construction phase.

All construction contractors and local suppliers will be obligated to comply with Serbian Law on Labour and other relevant labour legislation. Considering the identified gaps in legal definitions and enforcement noted above, to ensure compliance with EBRD's labour related requirements contained in PR 2 and enhance the positive impact, some additional measures will be implemented, as follows:

- Develop a labour management plan with a strategy for local employment which includes:
  - Assessment of local market capacity in relation to the assessment of the required workforce (skills and experience)
  - Strategy for skill development and training – aimed at current workforce and local population
  - Policies and procedures for labour management on site (recruitment procedures, working hours and overtime, contract arrangements, etc.)

- Procedures for procurement and management of subcontractors with regards to labour practices and working conditions (including health and safety) – ensure that all non-employee workers are engaged in line with both national legislation and applicable international (ILO) standards and recommendations
- Plan of workers accommodation area and facilities on site
- Workers accommodation on site (if any) to be designed in line with the international best practice (EBRD/IFC Guidelines for Workers Accommodation: processes and Standards, 2009<sup>11</sup>)
- Grievance mechanism for the workers on site, including subcontractors and suppliers
- Announce employment opportunities locally and encourage women to apply;
- Clearly communicate to the community the employment estimates, timeframes and skills requirements;
- Procure goods and services locally whenever possible, investigate existence of local suppliers and strive to promote small business development.

The implementation of these measures, alongside close monitoring of contractor and subcontractor (if any) compliance, will help reduce labor-related risks, especially for migrant and vulnerable workers, and increase the overall positive employment impact.

### 2.8.2 Operation and Maintenance Phase

The operation of the dam does not require significant staffing and the maintenance is expected to be conducted by permanent SrbijaVode staff. Therefore, opportunities for local employment or the provision of goods and services are also very low, except maybe a few individuals. This impact is assessed as negligible.

### 2.8.3 Decommissioning Phase

The decommissioning phase is expected to have similar opportunities for employment of local population as the construction stage. Requirements for unskilled labour and transport services are expected to be mostly sourced from within the neighbouring communities. The sensitivity of individuals who will get employment is medium, however due to the limited number of individuals and limited duration of activities, the magnitude is assessed as medium, which is why this impact is assessed as a medium beneficial, with negligible residual.

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<sup>11</sup> Workers' Accommodation: Processes and Standards

**Table 12 - Impact Assessment Table**

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Labour and working conditions	Engagement of the workforce through informal contracts, with no defined working hours, proper compensation or accommodation	Workforce – direct employees and non-employee workers	Major	High	Major	<ul style="list-style-type: none"> <li>Develop Labour Management Plan with policies and procedures relevant to the entire workforce – employment contracts, working hours and overtime, contract duration and termination, compensation</li> <li>Develop Subcontractor and Supplier Management Plan with procedures and policies referencing compliance with Serbian national legislation and EBRD ES Policy, with penalties included in case of non-compliance</li> </ul>	Negligible
Training and Employment opportunities	Creating opportunities for training and employment of local population to be engaged on the Project – directly or indirectly	Local communities	Moderate	Moderate	Moderate	<ul style="list-style-type: none"> <li>Develop local employment strategy which includes assessment of local workforce capacity related to the project, and develop a training program for upskilling</li> <li>Advertising of employment opportunities with clear requirements and timeframes</li> <li>Implement fair employment practices</li> </ul>	Positive
Worker accommodation	Workers' accommodation must comply with worker accommodation standards, regardless of whether the Contractor establishes a dedicated camp or workers are housed within local communities	Workforce	Moderate	Moderate	Moderate	<ul style="list-style-type: none"> <li>Develop and implement Workers Accommodation Plan</li> <li>Develop and implement Workers Grievance Mechanism</li> </ul>	Negligible
Influx of workers	Influx of non-local and foreign workers may cause social tensions,	International / migrant	Minor	Low	Minor	<ul style="list-style-type: none"> <li>For local communities: implement cultural sensitivity training; maintain clear information-sharing with</li> </ul>	Negligible

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
	overburden local services, or contribute to increased risks such as GBVH. For workers, risks include lack of freedom of movement, limited access to information, and exploitation through informal / irresponsible recruitment practices	workforce, local communities				community; adopt a community-based GBVH awareness strategy. <ul style="list-style-type: none"> <li>For workers: implement responsible recruitment policies; provide contracts and rights info in native languages; ensure access to grievance mechanism; require all workers to sign a Code of Conduct following GBVH and conduct training during induction.</li> </ul>	

**Table 13 – Mitigation and Monitoring**

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Labour and working conditions	Engagement of the workforce through informal contracts, with no defined working hours, proper compensation or accommodation	Workforce – direct employees and non-employee workers	<ul style="list-style-type: none"> <li>Contractor to develop a Labour Management Plan (LMP) with policies and procedures for management of labour and working conditions for the entire workforce in line with Serbian Labour Law and EBRD PR2.               <ul style="list-style-type: none"> <li>Supervising Engineer to review and approve the LMP</li> </ul> </li> <li>Contractor to develop Subcontractor and Supplier Management Plan with procedures and policies referencing compliance with Serbian national legislation and EBRD ES Policy, with penalties included in case of non-compliance</li> <li>LMP to be included in the tender documents for all Subcontractors as a contract requirement</li> <li>Contractor to set up regular (monthly) inspections of the labour and working conditions on site and report the findings in their Progress Reports</li> <li>Srbija Vode (through external consultant) to conduct 6-monthly, independent audits of the</li> </ul>	<ul style="list-style-type: none"> <li>Upon award of contract; prior to site mobilisation</li> <li>Before the start of construction activities</li> <li>Upon award of contract; prior to site mobilisation</li> <li>During procurement process for each subcontractor</li> <li>Monthly inspections and Progress Reports</li> <li>Semi-annual labour audits</li> </ul>



Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
			labour management practices on site and conduct worker interviews, to assess effectiveness of policies and procedures, training programs, quality of site facilities including workers accommodation, review of workers grievance register and any follow-up actions	
Training and Employment opportunities	Creating opportunities for training and employment of local population to be engaged on the Project – directly or indirectly	Local communities	<ul style="list-style-type: none"> <li>Collect data on names and qualifications of PAPs and their family members who are interested in employment. Training plans to be included in Livelihood Restoration plan. <ul style="list-style-type: none"> <li>Contractor to develop a Labour Management Plan with a strategy for local employment</li> </ul> </li> <li>Implement the local employment strategy <ul style="list-style-type: none"> <li>Overview of implemented actions from the Labour employment strategy with statistics on the local workforce in the overall workforce (segregated by gender)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>During Procurement of works and up to Contractor mobilisation on site</li> <li>During Construction stage</li> <li>Monthly Progress Reports</li> </ul>
Worker accommodation	Workers' accommodation must comply with worker accommodation standards, regardless of whether the Contractor establishes a dedicated camp or workers are housed within local communities	Workforce	<ul style="list-style-type: none"> <li>Contractor to develop a Worker Accommodation Plan in line with applicable standards</li> <li>Overview of the workers accommodation condition to be included in contractor's regular progress reports</li> </ul>	<ul style="list-style-type: none"> <li>Prior to camp set up</li> <li>Monthly Progress Reports</li> </ul>
Influx of workers	Influx of non-local and foreign workers may cause social tensions, overburden local services, or contribute to increased risks such as GBVH. For workers, risks include lack of freedom of movement, limited access to information, and exploitation through informal / irresponsible recruitment practices	International workforce, local communities	<ul style="list-style-type: none"> <li>Contractor to develop and implement a Responsible Recruitment Strategy, covering: no recruitment fees, written contracts and terms provided prior to departure, prohibition of document retention, full wage transparency, and assurance of freedom of movement.</li> <li>Contractor to ensure all recruitment agencies are vetted and aligned with ILO standards.</li> </ul>	<ul style="list-style-type: none"> <li>Prior to hiring and mobilization of international / migrant workforce</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
			<ul style="list-style-type: none"> <li>• Contractor to provide all workers with induction training on rights, project standards, grievance mechanism (in native language), and GBVH. All workers to sign a Code of Conduct.</li> <li>• Contractor to conduct cultural sensitivity training for workers to reduce tension with local communities.</li> <li>• Contractor to develop a Worker Accommodation Plan</li> <li>• Contractor to include summary of any grievances or incidents between the workers and the community in regular / monthly progress reports</li> </ul>	<ul style="list-style-type: none"> <li>• Prior to start of work + annual refreshers</li> <li>• Prior to camp set up</li> <li>• Monthly Progress Reports</li> </ul>

## 3. Land Acquisition and Displacement

### 3.1 Introduction and Purpose

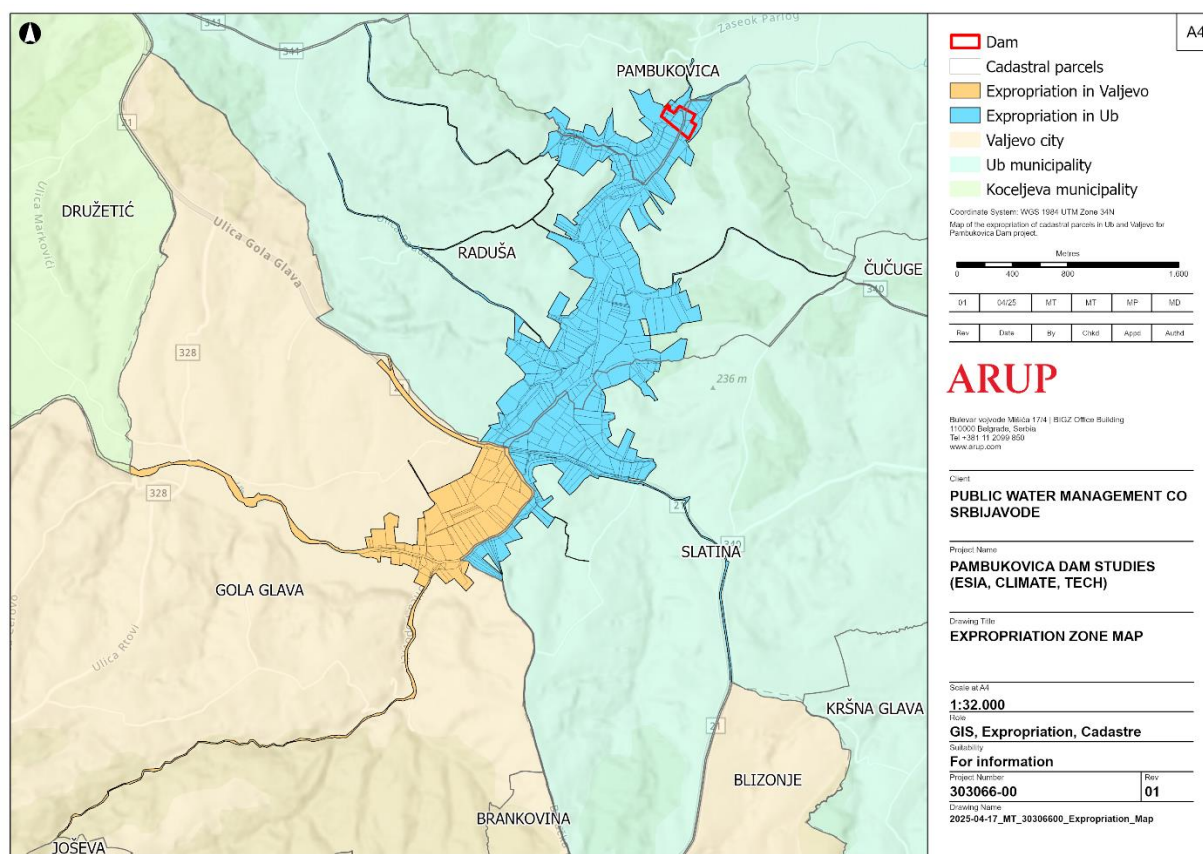
This chapter includes the overview of the impacts from land acquisition process related to the Project. The land acquisition will primarily be conducted through the permanent expropriation of land in line with the national legislation process, while some land may be temporarily leased during construction stage.

The primary objectives of the land acquisition process are to define land parcels for expropriation, encompassing areas needed for the dam, ancillary structures, and the reservoir; to ensure the legally sound acquisition of land, in compliance with all relevant Serbian laws and regulations and the EBRD's PR5, and to minimize disruption to landowners and communities affected by the acquisition.

It shall be noted that detailed information on land acquisition process and impacts, as well as survey data on PAPs directly affected by expropriation is presented in separate document – Historic Land Acquisition Audit with Corrective Action Plan.

### 3.2 Receptors and Area of Influence

The map below indicates the land that is being expropriated for the project, including the area of the dam itself, the service areas around the dam, the reservoir and the local roads. The actual area of influence is considered to include the entire municipalities Ub and Valjevo, as well as Koceljeva to the west, as these municipalities might be impacted by a higher demand for agricultural land and increased market value for agricultural land, from PAPs looking to purchase new land following expropriation.



**Figure 7 - Area of influence - land acquisition**

### 3.3 Legislation and Standards

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 has been identified and listed based on the Project scale, nature, and the agreed-upon scope of the Project assessment.

Details on national legislation

#### 3.3.1 National legislation

Below is selection of main national legislation relevant to the topic of labour management in Serbia, which will be considered for this Assignment:

- 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 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 Agricultural Land (Official Gazette of the RS, No. 62/2006, 65/2008, 41/2009, 112/2015, 80/2017 and 95/2018)

- The Law on Water (Official Gazette of the Republic of Serbia, no. 30/2010, 93/2012, 101/2016, 95/2018, and 95/2018 – other law)
- The Law on Forests (Official Gazette of the Republic of Serbia, no. 30/2010, 93/2012, 89/2015, and 95/2018 – other law)
- Law on the Planning System of the Republic of Serbia. (Official Gazette of RS, No. 30/2018)
- 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 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 Public Property (Official Gazette of the Republic of Serbia, No. 72/2011, 88/2013, 105/2014, 104/2016 - other law, 108/2016, 113/2017, 95/2018, 153/2020 and 94/2024)
- Law on State Survey and Cadastre ("Official Gazette of RS", No. 72/2009, 18/2010, 65/2013, 15/2015 - decision of the Constitutional Court, 96/2015, 47/2017 - authentic interpretation, 113/2017 - another law, 27/2018 - another law, 41/2018 - another law, 9/2020 - another law and 92/2023)
- The Law on the Procedure of Registration in the Real Estate Cadastre and Cadastre of Infrastructure (Official Gazette of the Republic of Serbia, No. 41/2018, 95/2018, 31/2019, 15/2020, and 92/2023)
- Law on Local Self-Government (Official Gazette of the Republic of Serbia, No. 129/2007, 83/2014 - other law, 101/2016 - other law, 47/2018, and 111/2021 - other law)
- Law on Communal Services ("Official Gazette of the Republic of Serbia", no. 88/2011, 104/2016, 95/2018 and 94/2024)
- The 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)
- Ordinance on capital projects ("Official Gazette of RS", No. 79/2023)
- 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)

Document	Description
<p>The Expropriation Law  ("Official Gazette of the Republic of Serbia", No. 53/95,  "Official Gazette of the Federal Republic of Yugoslavia", No.  16/2001 - Decision of the Supreme Court of Serbia and  Montenegro, and "Official Gazette of the Republic of Serbia",  No. 20/2009, 55/2013 - Decision of the Constitutional Court and  106/2016 - authentic interpretation).  <a href="https://pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/skupstina/zakon/2009/20/4">https://pravno-informacioni-sistem.rs/SIGlasnikPortal/eli/rep/sgrs/skupstina/zakon/2009/20/4</a></p>	<p>This central law represents the main framework for expropriation in Serbia. Real estate can be expropriated or property rights over them can be restricted only in the public interest determined by law, with compensation that cannot be lower than market value. The public interest for the expropriation of immovables is determined by law or by the decision of the Government in accordance with this law. For the purposes of this law, immovables are considered to be land, buildings, and other structures.</p>

Document	Description
The Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia", No. 18/2016, 95/2018 - authentic interpretation, and 2/2023 - decision of the Constitutional Court) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2016/18/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2016/18/2/reg</a>	The administrative procedure represents a set of rules that state authorities and organizations, bodies and organizations of provincial autonomy, bodies and organizations of local self-government units, institutions, public enterprises, special bodies through which regulatory functions are exercised, and legal and natural persons entrusted with public authorities (authorities) apply when resolving administrative matters.
The Law on Obligations (contracts and torts) ("Official Gazette of the Socialist Federal Republic of Yugoslavia", No. 29/78, 39/85, 45/89 - decision of the Constitutional Court and 57/89, "Official Gazette of the Socialist Republic of Yugoslavia", No. 31/93, "Official Gazette of the Federal Republic of Yugoslavia", No. 1/2003 - Constitutional Charter and "Official Gazette of the Republic of Serbia" No. 18/2020) <a href="https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1978/29/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1978/29/1/reg</a>	This law deals with mandatory legal relationships arising from contracts, torts, unjust enrichment, unauthorized management, unilateral declarations of intent, and other facts specified by law.
Law on the Fundamentals of Property Relations ("Official Gazette of the Socialist Federal Republic of Yugoslavia", No. 6/80 and 36/90, "Official Gazette of the Federal Republic of Yugoslavia", No. 29/96 and "Official Gazette of the Republic of Serbia", No. 115/2005 - consolidated law) <a href="https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1980/6/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/slsfrj/skupstina/zakon/1980/6/1/reg</a>	This fundamental law establishes the central principles of property ownership in Serbia. It serves as the foundation for all processes of acquiring land, ensuring the respect of legal property rights, and providing a framework for determining fair compensation.
Law on Agricultural Land ("Official Gazette of the Republic of Serbia", no. 62/2006, 65/2008 – other law, 41/2009, 112/2015, 80/2017, and 95/2018 – other law) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2006/62/7/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2006/62/7/reg</a>	This law regulates the planning, protection, development and use of agricultural land, the supervision of the implementation of this law and other issues of importance for the protection, development, and use of agricultural land as a good of public interest. Agricultural land is a good of public interest for the Republic of Serbia, which is used for agricultural production and cannot be used for other purposes, except in cases and under conditions determined by this law.
The Law on Water ("Official Gazette of the Republic of Serbia", no. 30/2010, 93/2012, 101/2016, 95/2018, and 95/2018 – other law) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2010/30/9/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2010/30/9/reg</a>	This law regulates the legal status of water, integrated water management, management of water bodies and water land, sources and methods of financing water activities, supervision of the implementation of this law, and other issues important for water management.
The Law on Forests ("Official Gazette of the Republic of Serbia", no. 30/2010, 93/2012, 89/2015, and 95/2018 – other law) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2010/30/8/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2010/30/8/reg</a>	This law regulates the preservation, protection, planning, cultivation, and utilization of forests, as well as the disposal of forests and forest land, supervision over the implementation of this law, and other matters significant for forests and forest land.
The Law on the Planning System of the Republic of Serbia ("Official Gazette of RS", No. 30/2018)	This law regulates the planning system of the Republic of Serbia, including the

Document	Description
<a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg</a>	management of the public policy system and medium-term planning. It defines the types and contents of planning documents that all participants in the planning system propose, adopt, and implement according to their competencies. It also addresses the mutual alignment of planning documents, the procedure for determining and implementing public policies, the obligation to report on the implementation of planning documents, and the corresponding application of the obligation to conduct impact analyses on regulations and evaluate the effects of these regulations.
Law on Strategic Environmental Impact Assessment ("Official Gazette of the Republic of Serbia", No. <b>94/2024</b> ) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg</a>	This law regulates the conditions, methods, and procedures for assessing the impact of certain plans and programs on the environment (strategic assessment), aiming to protect the environment and promote sustainable development by integrating fundamental principles of environmental protection into the process of preparing and adopting plans and programs.
The Environmental Impact Assessment Law ("Official Gazette of the Republic of Serbia", No. <b>94/2024</b> ) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/29/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/29/reg</a>	This law regulates the conditions, manner, and procedure for assessing the impact of certain plans, programs, and projects on the environment. Additionally, it governs the scope and content of spatial, urban planning, and technical documentation.
The Law on Planning and Construction ("Official Gazette of the Republic of Serbia", No. 72/2009, 81/2009 - corr., 64/2010 - decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 - decision of the Constitutional Court, 50/2013 - decision of the Constitutional Court, 98/2013 - decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg</a>	<p>This law regulates the conditions and manner of spatial planning, development, and use of construction land and facilities, supervision over the implementation of the provisions of this law and inspection supervision, as well as other important issues related to spatial planning, development, and use of construction land and facilities.</p> <p>It should also be noted that according to Article 134a of this law, an investor investing in the construction of linear infrastructure facilities of special significance for the Republic of Serbia is obliged to provide the owner of a residential building constructed before the spatial plan designating the land for public purposes came into force, with another suitable residential building or apartment, regardless of whether proceedings for the legalization of that building have been initiated, or to pay them monetary compensation in the amount necessary to provide another suitable residential building or apartment.</p>
Law on Public Property	This law regulates the right of public property and certain other property rights



Document	Description
<p>("Official Gazette of the Republic of Serbia", no. 72/2011, 88/2013, 105/2014, 104/2016 - other law, 108/2016, 113/2017, 95/2018, 153/2020 and 94/2024)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/72/4/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/72/4/reg</a></p>	<p>of the Republic of Serbia, autonomous provinces, and units of local self-government. Public property includes the right of ownership of the Republic of Serbia (state property), the right of ownership of an autonomous province (provincial property), and the right of ownership of a unit of local self-government (municipal or city property). Public property includes natural resources, goods of public interest, and goods in general use for which it is determined by law to be in public ownership, items used by the bodies and organizations of the Republic of Serbia, autonomous provinces, and units of local self-government, public institutions, public enterprises, and other organizations established by the Republic of Serbia, autonomous provinces, and units of local self-government, and other items that are, in accordance with the law, in public ownership.</p>
<p>Law on State Survey and Cadastre  ("Official Gazette of RS", No. 72/2009, 18/2010, 65/2013, 15/2015 - decision of the Constitutional Court, 96/2015, 47/2017 - authentic interpretation, 113/2017 - another law, 27/2018 - another law, 41/2018 - another law, 9/2020 - another law and 92/2023)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/12/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/12/reg</a></p>	<p>This law regulates professional activities and tasks of state administration related to state surveying, real estate cadastre, cadastre of infrastructure and underground facilities, basic geodetic works, address registry, topographic-cartographic activities, real estate valuation, geodetic-cadastral information system, and National Infrastructure for Geospatial Data, as well as geodetic works in engineering and technical activities.</p>
<p>The Law on the Procedure of Registration in the Real Estate Cadastre and Cadastre of Infrastructure  ("Official Gazette of the Republic of Serbia", No. 41/2018, 95/2018, 31/2019, 15/2020, and 92/2023)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/41/3/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/41/3/reg</a></p>	<p>This law regulates the rules of procedure for registration in the real estate cadastre and the cadastre of infrastructure and underground facilities, their maintenance, the subject, and types of registration in that procedure, the rules of issuing extracts from the said registers, as well as other issues relevant to the maintenance of the real estate cadastre and the infrastructure cadastre. The provisions of this law regulating the subject and types of registration also apply to the procedure for the renewal of the cadastre, unless otherwise specified by law.</p>
<p>Law on Local Self-Government  ("Official Gazette of the Republic of Serbia", no. 129/2007, 83/2014 - other law, 101/2016 - other law, 47/2018, and 111/2021 - other law)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2007/129/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2007/129/2/reg</a></p>	<p>This law regulates local self-government units, the criteria for their establishment, competences, bodies, supervision of their acts and work, protection of local self-government, and other issues important for the exercise of the rights and duties of local self-government units.</p>
<p>Law on Communal Services</p>	<p>This law defines Communal Services and regulates the general conditions and</p>

Document	Description
<p>("Official Gazette of the Republic of Serbia", no. 88/2011, 104/2016, 95/2018 and 94/2024)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/88/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2011/88/2/reg</a></p>	<p>manner of their provision. According to this law, communal services are activities that provide utilities essential for meeting the living needs of individuals and legal entities. Local government units are obligated to create conditions for ensuring the appropriate quality, scope, accessibility, and continuity of these services, as well as to oversee their provision.</p> <p>Communal services are considered activities of general interest, they include but are not limited to: supply of drinking water, treatment and disposal of rainwater and wastewater, production, distribution and supply of thermal energy, municipal waste management, urban and suburban passenger transport, cemetery management and burial, management of public parking spaces, provision of public lighting, management of the town markets, maintenance of streets and roads, maintaining cleanliness in public areas, chimney sweep services, maintenance of public green areas and pest control activities.</p>
<p><b>The Regulation on the Methodology of Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents</b>  ("Official Gazette of RS", No. 20/2025)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg</a></p>	<p>This regulation specifies the methodology for managing public policies in detail, particularly the scope, process, and control of impact analysis during the creation of public policy documents, as well as the analysis of impacts after their adoption. It includes the procedures for conducting consultations and public discussions on public policy documents, the content and form of public policy documents, the elements of impact analysis of adopted public policy documents, the method of reporting on the results of public policy implementation, the method of evaluating public policy effects, and the areas of planning and implementing public policies.</p>
<p><b>Ordinance on capital projects</b>  ("Official Gazette of RS", No. 79/2023)  <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2023/79/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2023/79/1/reg</a></p>	<p>This regulation further specifies the content, method of preparation, evaluation, readiness assessment, and selection of capital projects, monitoring of implementation, performance reporting, and evaluation of all positive and negative effects of capital projects, with the aim of effective and efficient management of public funds</p>
<p><b>The Rulebook on the content, method and procedure for the development of spatial and urban plans</b>  ("Official Gazette of RS, no. 32/2019 and 47/2025")</p>	<p>This rulebook specifies in detail the content, method, and procedure for drafting spatial and urban planning documents.</p>

Document	Description
<a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg</a>	
<b>The Rulebook on the Content of the Environmental Impact Assessment Study</b> ("Official Gazette of RS", No. 69/05) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg</a>	This rulebook specifies in detail the content of the request for deciding the need for an impact assessment and the content of the request for determining the scope and content of the environmental impact assessment study.

### 3.3.2 EBRD Requirements

EBRD E&S Performance Requirements relevant to land acquisition, physical and economic displacement:

- PR1 - Assessment and Management of Environmental and Social Impacts and Issues;
- PR5 - Land Acquisition, Involuntary Resettlement and Economic Displacement;
- PR10 - Information Disclosure and Stakeholder Engagement.

### 3.3.3 Regional and global standards and requirements

Following regional and global standards and requirements will be taken into consideration as part of the Project assessment:

- 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;
- National obligations under international law (including the Espoo Convention)
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines;
- EBRD Paris Agreement alignment methodology

## 3.4 Methodology

An initial survey and impact assessment has been conducted based on review of secondary data sources, including project documentation, publicly available data, and applicable legislation and standards relevant to land acquisition and livelihood restoration, as well as collection of primary data through survey of the affected communities and interviews with government entities implementing the expropriation process.

The assessment was conducted in line with the overall methodology for the ESIA as presented in BOOK 1 Introduction.

Details of methodology The collection and processing of baseline data presented in this chapter has been done through a number of methods, including:

- Desktop review and analyses of official socio economic statistical data available online from the Statistical Office of the RS, at village and municipal level<sup>12</sup>

<sup>12</sup> Statistical Office of the Republic of Serbia (2023) 2022 Census of Population, Households and Dwellings: 1) *Households According to the Number of Members: Data by settlements*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234005.pdf>; 2) *Age and Sex: Data by settlements*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234003.pdf>; 3) *Small settlements population*. Available at: <https://publikacije.stat.gov.rs/G2025/Pdf/G20254012.pdf>; 4) *Ethnicity: Data by municipalities and cities*. Available at: <https://publikacije.stat.gov.rs/G2023/Pdf/G20234001.pdf>; 5) *Educational Attainment, Literacy and Computer Literacy: Data by municipalities and cities*. Available at: [publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf](https://publikacije.stat.gov.rs/G2023/Pdf/G20234006.pdf) 6) *Census 2022 – Excel tables* Available at: <https://popis2022.stat.gov.rs/sr-latn/popisni-podaci-eksel-tabele/>

- Desktop review and analyses of other publicly available data from various sources, including the National Employment Agency of the RS, the Business Registry of the RS, municipal studies and plans, etc.
- Desktop review of Project specific documentation – plans, studies, permitting documentation
- Feedback obtained during stakeholder meetings held with representatives of the municipalities Ub and Valjevo
- Data collected through the survey of households directly impacted by expropriation for the Project, in cadastre municipalities Pambukovica, Radusa, Slatina and Gola Glava
- data collected through the survey of households in the neighbouring cadastre municipalities, who might be indirectly affected by Project activities, and could be included in phase II of the project (irrigation system)

The main documents reviewed as part of this assessment include:

- Expropriation study developed by Energoprojekt-Hidroinzenjering a.d. dated Feb 2020.
- Updated Expropriation Study developed by Andzor inzenjering d.o.o. dated Apr 2022.
- Reports on completed expropriation as provided by Srbija Vode
- The Environmental Impact Assessment (EIA),
- Project design for the Building Permit
- Spatial and Regulation Plans

The primary data collection was conducted through a survey of households whose property was being expropriated. The survey was conducted in the period from mid November to mid December 2024. The municipal questionnaires focused on the following areas:

- Their status in the process of expropriation.
- Assessment of consultation process and compensation offered.
- Basic socio-economic data about the households including information to inform the vulnerability assessment.
- Livelihood sources, reliance on agriculture, reliance on ecosystem services.
- Self-assessment of the status of their household before and after expropriation.

Sampling was carried out on randomised basis through door-to door surveying. A total of 34 PAPs participated in the survey (11% of the total number of PAPs)

The respondents were informed that they had no obligation to participate in the survey, that they would remain anonymous throughout the lifecycle of the project, and that they had the right to withhold any and all information they wish.

Due to concerns that the limited sample of surveyed PAP might not have captured all the individual impacts on the PAPs, and particularly the identification of PAPs who might be adversely impacted by the project due to their vulnerabilities, additional surveys with PAPs will be conducted during the period of public disclosure for the ESIA. The overall target of the survey sample is 60 people (20% of all PAPs), excluding the PAPs who have already been surveyed. The surveys are expected to be conducted through two main avenues – individual/random surveys and targeted surveys. The criteria and targeted sample sizes are presented in the Historic Land Acquisition Audit with Corrective Action Plan.

### **3.5 Assumptions and limitations (if applicable)**

Land acquisition is still in progress and areas of impact refer to the dam, the reservoir and associated facilities (access roads). Available data on impacts shall be further verified to ensure its correctness and completeness. Possibility of additional land requirements for

relocation of the road, sand traps, biodiversity offset and other relevant project components will also be verified and included in the updated report.

There is currently no information on the scope of impact from Phase 2 – irrigation system, or the scope of temporary land acquisition during construction stage (site office, camp, storage and maintenance areas, deposit areas, etc.)

### 3.6 Baseline

The Project is impacting the land within the four cadastre municipalities, located mostly in Municipality Ub and partly in the wider area of the City of Valjevo.

Pambukovica, Slatina, Raduša, and Gola Glava are small villages located in Serbia's rural regions, primarily within the Western Serbia district. These villages exhibit typical characteristics of rural Serbian communities, where agriculture and related activities dominate the socio-economic landscape. The demographic trends in these areas have been marked by an aging population and declining numbers due to urban migration, a common pattern across rural Serbia. The younger population is migrating to the closer towns Ub or Valjevo for work opportunities, or to the national capital Belgrade which is less than 60km away.

As with similar communities across Serbia, there is recreational hunting and fishing in the area. The outskirts of the river valley and the neighbouring hills are also used by the local beekeepers for hive placement. The reliance on ecosystem services is typically recreational or a supplement to the household's income. The impact to ecosystem services from the project is expected to be limited. According to the Serbian legislation, hunting areas within each municipality are considered as all areas that are over 300m from any residential properties, meaning that most of the area of the affected CMs can be considered as hunting area. The area impacted by the project was in part used for agricultural activities limiting its viability for hunting. Beekeeping activities are not expected to be impacted by the project as the impacted area is mostly within the river valley, away from the areas where beekeeping activities take place, however as dust can have a negative impact on beekeeping, mitigation measures regarding dust suppression from the project (traffic and construction activities) and consultation with the local community will need to be considered.

**Pambukovica** is a village in the municipality Ub located some 13km from the city Ub. As of the 2011 Census, the village had a population of around 1,300 people, with a slightly higher number of women, reflecting the typical gender ratio in rural Serbia 52% female to 48% male. However the 2022 Census data indicates a significant decline in the population with only 740 recorded residents, with a similar gender ratio. The population is predominantly Serbian, with a significant proportion of elderly residents. Less than 1% of the population identifies as Roma.

The local economy relies heavily on agriculture, with most households engaged in farming. The primary agricultural activities include crop production (corn, wheat) and livestock breeding (cattle, pigs). Some residents also engage in small-scale trade and services within the village or commute to nearby towns for work.

**Slatina** is a small village in the municipality of Ub, with a population of approximately 286 residents according to the 2022 Census. Unlike Pambukovica the population has not changed significantly from the 2011 census (305 residents) and the gender ratio is tilting slightly to the

male population with 53% male residents. The village has a high proportion of older inhabitants and the population is predominantly Serbian, with no significant Roma community reported.

Agriculture is the mainstay of Slatina's economy, with a focus on fruit growing, particularly plums and apples, and livestock farming. The village also has some small-scale dairy production. The economy is predominantly subsistence-based, with limited commercial agricultural activities.

**Raduša**, located in the municipality of Ub, only 20km from the municipal centre Ub and 30km from Valjevo, has a population of about 180 residents according to the 2022 Census, which is a steep decline from the 2011 Census data (450 in 2011). Similar to other villages in the region, it has an aging demographic profile, with younger residents frequently leaving for better opportunities elsewhere.

The economic activity in Raduša is also centred around agriculture, particularly vegetable cultivation and animal husbandry. Some households are involved in beekeeping, which provides supplementary income. Due to its proximity to larger towns, some residents work in nearby industrial or service sectors.

**Gola Glava** is part of the Valjevo municipality, and has a population of approximately 500 people as of the 2022 Census data, also slightly tilting towards the male population (51.5%). The village is characterized by a declining population and a significant proportion of elderly residents. Majority of residents identify as Serbian with less than 1% identifying as Roma. As with the other villages in the Project area the economy is primarily agricultural, focusing on livestock farming and the cultivation of cereals and fruits. Gola Glava also has a tradition of producing rakija (a type of fruit brandy), which is both for local consumption and sale. There are limited opportunities for non-agricultural employment within the village, leading to some reliance on pensions and remittances from family members working in cities.

### 3.6.1 Project affected land

The overall area of the Project spans 2.674.664 m<sup>2</sup> across 265 land parcels which are being expropriated. Of these, 2.230.024 m<sup>2</sup> are located within the Municipality of Ub, specifically the cadastral municipalities (CM) of Pambukovica, Raduša, and Slatina. The other 444.640 m<sup>2</sup> of land targeted for acquisition are within the CM Gola Glava, which falls administratively under the jurisdiction of the City of Valjevo.

The Project envisage development of a 27 m earth embankment dam (the Pambukovica dam) with main intended function to protect the area with long history of destructive floods (phase 1 of the Project). Activities on its design and construction were accelerated after the 2014 floods that caused unprecedented level of damage to the population and the economy. Legal base for the construction of the Pambukovica dam is confirmed through numerous local strategic and planning documents<sup>13</sup> that offer a base for declaration of public interest for its

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<sup>13</sup> Water Management Basis of the Kolubara River Basin (1977); Regional Spatial Plan of the Kolubara and Mačva Administrative Districts (2015); Spatial Plan of the Municipality of Ub (2012); Detailed regulation plan of Pambukovica dam on the river Ub (2016); Detailed Regulation Plan for the Dam and Multipurpose Reservoir "Pambukovica" on the Ub River, located within the territory of the City of Valjevo, for the part of the cadastral municipality Gola Glava (2017); Study on the Improvement of Flood Protection in the Kolubara River Basin (*Preliminary Report, Jaroslav Černi Water Institute, 2015*).



construction, meaning that the interest in developing with the Projects outruns any individual interest including the right to property.

In accordance with the Serbian legislation, the Declaration of public interest for the Project constitutes the cut-off date for expropriation. Any changes in property ownership after this date are not considered during the expropriation procedure. The expropriation procedure does allow amendments to the cadastre information after this date, only in cases where previous transfers of ownership have not been appropriately registered in the cadastre. The Government of the Republic of Serbia adopted the Decision on determining the public interest for the Pambukovica dam project on 12 May 2021, based on the original Expropriation study. Following the update of the Expropriation study which included the splitting of the land parcels, the amended Decision of determining the public interest was adopted on 18 August 2022.

In terms of affected land parcels, CM Pambukovica accounts for 51, CM Raduša for 167. CM Slatina for 101 parcels and CM Gola Glava for 37 parcels which are to be expropriated. The number of impacted PAPs is estimated to be 307 at this stage of the expropriation process. This number may change by the end of process, as further confirmations of ownership are completed. It is not uncommon for individuals to own several land parcels within the Project area, or for a land parcel to have multiple owners, each with their individual percentage of ownership.

The majority of land (74%) is agricultural land, 14% is forest land, 5% are rivers and 6% is existing road infrastructure. The remaining 1% includes construction land, house yards, infertile land and orchards. Most of the land is privately owned, with the exception of the roads and rivers which are publicly owned. The average land plot is relatively small (2–5 hectares) and primarily operated by individual producers, reflecting a relatively underdeveloped agricultural market. No common property resources are identified in the

### **Project affected area.**

Current assessment of land impacts refers to the area of land required for the construction of the dam and the reservoir, the reconfiguration of the State road no 21, as well as main access roads. Land that would be temporarily occupied during construction (for the camp area) has not been identified to date, and would be arranged by the Contractor directly, however it is expected that the camp and storage areas would be located within the area of accumulation which has already been expropriated.

Some additional land acquisition might be required for widening of the existing roads, sediment traps on the Ub river tributaries and the access roads to these sediment traps, as well as for rural roads to ensure access to private property where required. The location and area of this additional land could not be identified at this stage. It is assumed that this additional land acquisition would be impacting small areas of land from individual owners, and would be acquired through easement contracts. The position of the access roads is agreed in advance with the owners to ensure minimal negative impact, and provision of added benefit if possible. Finally, the ESIA process might result in additional land being acquired to mitigate the impacts on biodiversity (biodiversity offset), however this impact is not expected, and the scope is yet to be finalised.



### 3.6.2 Project affected structures

Only five structures have been identified within the area of expropriation, not considering the public roads which will be affected by the Project. These structures include two residential / weekend houses, one small outhouse, one auxiliary structure (barn) and one monument. Details on the structures and impacts are provided in the Historic Land Acquisition Audit Report.

It should be noted, that despite two residential buildings being affected the Project will not result in any physical resettlement. One of the residential buildings, covering an area of 562 m<sup>2</sup> belongs to a local retired couple who still reside primarily in Austria. The rest of the property also includes a 46m<sup>2</sup> outhouse to the side of the main house. The property is currently used by the owners as a seasonal residence for a few months each year. However, it was originally intended to become their permanent home upon retirement. Although no formal requests for exemption from expropriation have been submitted by the owners, they have been in contact with Srbijavode about finding a technical solution to exclude the property from the expropriation zone, since the property lies at the edge of the planned reservoir. The solution considers construction of an embankment wall to the east of the property towards the reservoir. The technical solution might also require additional consideration during the operational phase of the dam.

The other residential property is a large two story building the surface area of which has not been determined. The building is not finished and based on its weathered state it has been left unfinished for several years. It is not used for permanent nor temporary residence. The barn is used for storage of equipment and livestock feed. No livestock was noted in the barn during the survey.

The monument is located on a privately owned land parcel and is not recorded by the local cultural heritage agencies. It is approximately 1m<sup>2</sup> in base (1m x 1m) and approximately 2,5 m high, made out of stone. The monument is expected to be relocated and negotiations are ongoing with the parcel owner and the CM representatives regarding the location for relocation.

The compensation for the structures will be determined through the expropriation processed by an accredited expert witness in the field of structural engineering.

### 3.6.3 Project affected crops

Majority of the parcels being acquired for the Project are agricultural in nature, primarily cultivated with annual crops such as grains, wheat, and corn, with some orchards and vineyards as well. This is typical with alluvial planes along the river where soil is relatively flat and of higher quality. Across the area of the reservoir there are also significant areas of forests that will be expropriated.

As part of the expropriation process, value of the crops is determined by an accredited expert witness in the field of agriculture who determines the value of the crops based on the type, maturity (in case of perennial crops and timber) and current market values. The valuation for the forest land is being conducted in parallel with the valuation of land. Owners will receive compensation for the loss of the trees as well as the land below. Similarly, in cases of perennial crops, the valuations by licenced experts are also ongoing.

With regards to the annual crops, Srbijavode adopted the approach of timely notification instead of compensation. Considering that the start of the construction activities, or any site mobilisation is not imminent, the owners of land parcels will be allowed to cultivate their fields even after the expropriation of land is finalised, until the planted crops have come to yield. Compensation for annual plants will be paid out only in the rare cases where site activities have to start before the crops have come to yield and in those cases the valuers will determine the amount of compensation.

#### **3.6.4 Status of expropriation**

The expropriation study (from Feb 2020) was developed for Phase 1 of the Project – dam and water accumulation area. It describes the approach used to determine the line of expropriation, based on the dam design and scope of the accumulation, including safety zones. The study has been developed in line with national legislation and outlined the compensation methodology used across the project. The updated study (Apr 2022) simply provided corrections to the affected land parcels, noting the required split of land parcels so that only the required areas of land could be expropriated (and not entire parcels). The updated study included no additional information on the entitlements or the consultation process.

The expropriation process begun in 2020 in Municipality Ub, and in 2022 in Valjevo. Since the start of the process, the local property and ownership departments within the two Municipalities have gone through the administrative process of identifying the proper owners of the land parcels. This tends to be a significant portion of the expropriation process as ownership transfers are typically not formally conducted, and the Municipality has to determine living lawful heirs/owners in order to continue the formal expropriation process with them. To date almost 90% of all decisions on expropriation have been issued in Municipality Ub, and almost 65% in the City of Valjevo.

After the decision of expropriation is signed and the valuation of assets is conducted (crops and structures, if applicable), the owners receive proposal for compensation. If the proposal is accepted the payment of compensation is made within 30 days of acceptance. If the owners are not satisfied with the proposal, the formal process does not recognise negotiated prices, so the rejected proposal automatically triggers an out-of-court process, which can last for several months or years, but here the value of the compensation is determined by the court. Since October 2024, Municipality Ub started issuing the compensation offers. Compensation offers have been mostly accepted by the owners and compensation has been paid for over 60% of land acquired. Less than 5% of owners refused the proposed compensation and are awaiting court decisions, while the rest are still awaiting proposals. No compensation proposals have been initiated in Valjevo to date.

### **3.7 Project Activities and Identification of Impacts**

#### **3.7.1 Pre-Construction Phase**

Majority of impacts related to land acquisition are expected to occur in the pre-construction stage, during the expropriation process, with some additional impacts expected during the construction stage.

The Project is impacting approximately 267 ha of land, which will be permanently expropriated and the use of land changed. The total area of agricultural land that is being

expropriated is 197ha, while the total area of agricultural land in the four impacted cadastre municipalities is estimated at 5,419ha. Although not all of the land that is registered as agricultural is cultivated, almost all of the agricultural land that is expropriated, was cultivated – flat area with high class soil is typical along the river banks. So while the project is impacting less than 4% of all agricultural land, the owners are unlikely to be able to identify available agricultural land of the same quality in the vicinity of their residences.. An overview of current listings shows a lack of available agricultural land of any quality (in July 2025, only 13 listings in total available). It is therefore likely that the expropriation of land for the reservoir will result in increased demand for agricultural land in the affected communities, if households attempt to acquire replacement land, which would then drive up the price of land and disrupt the land market. The loss of agricultural land is likely to have an impact on livelihoods of the affected PAPs. Most of the impacted agricultural land was cultivated and provide financial support to the households – either as primary source of income, supplementary income or subsidies for household consumption.

### 3.7.2 Construction Phase

During construction stage, there will be limited impacts on land from temporary site locations (camp, storage areas, temporary roads) and potentially impacts from encroachment – construction activities taking place outside of the project area (manoeuvring of trucks and machines, waste disposal and concrete washout, etc.). Existing roads (Roads 21, 340 and 341) do not require improvements prior to start of construction. In case of damage to roads, works on the road reconstruction will be implemented by the Contractor. Proper channels of communication and grievance redress will have to be established to mitigate this risk. Some impacts are also expected to occur with regards to ecosystem services, specifically through limitations in hunting grounds. This impact is expected during constructions stage due to limited access to the area and disruptions to the local road network. The impact is expected to increase as the accumulation starts to fill up, however it is still expected to be minor.

### 3.7.3 Operation Phase

Apart from the permanent loss of land, and reduced area for hunting and beekeeping, no further impacts on land are expected in the operation phase.

### 3.7.4 Decommissioning phase

Minor impacts from temporary activities might be expected, similar to the impacts during construction phase.

## 3.8 Impact Assessment and Mitigation (including all project phases, pre-construction, construction, operation, decommissioning)

Land acquisition is being conducted in line with the Expropriation Law which is greatly aligned with EBRD PR5. The key gaps between the national legislation and PR5 are:

- Recognition of informal owners and users – which is not an issue on this Project as no informal users have been recorded through the land acquisition process to date.
- Market value Vs replacement value – Serbian legislation prescribes compensation
- Consultation and negotiation – Serbian legislation does not envisage negotiation for compensation. The compensation for land is determined through the tax authority based on the current market values, while the compensation for structures and crops is

determined by the authorised expert witnesses in specific fields who determine the value of the expropriated property. The owners can object to the valuations, in which case the compensation will be determined through a court procedure.

Summary of the key gaps between the national legislation and PR5 are presented below. Proposed measures for their mitigation are assessed in more detail in the Historic Land Acquisition Report. (Corrective Action Plan).

Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
<b>Stakeholder engagement</b>	PR 5 and PR10 requires active communication and consultations with all stakeholders, particularly involving consultations with the local community, including marginalized groups, socially or economically disadvantaged groups, and indigenous peoples (if located within the project's impact zone), throughout the entire planning and implementation cycle of the project. This involves adequate disclosure of information about potential impacts, collecting feedback, and consideration of received grievances during the decision-making and project development.	The Environmental Impact Assessment Law and the Law on planning and construction require public debates and consultations be held at every stage of document preparation, which typically includes information on land expropriation. The legal framework for these consultations is precisely defined in terms of when they should occur, how long the documents need to be publicly disclosed, and generally what they should encompass. Owners of parcels involved in the expropriation process are contacted directly after the public interest announcement, i.e., upon submission of the expropriation proposal. The expropriation process unfolds in two phases: (1) establishing status on the formal expropriation proposal and (2) establishing the compensation for the expropriated property. Both phases are conducted through individual consultations with the owners and official correspondence.	In the current legal framework for expropriation in Serbia, key provisions for early engagement with stakeholders and their meaningful participation in the decision-making process are lacking. Individuals affected by potential expropriation have the opportunity to learn about it through public announcements, but it is often the case that they are not informed until they receive the expropriation proposals in writing, leaving them without a voice at crucial early stages of project development.	Stakeholder Engagement Plan has been developed for the Project which includes a grievance mechanism. To date all grievances and issues related to the expropriation process have been conducted in line with the formal procedure defined.
<b>Grievance mechanism Accessibility and efficiency</b>	PR 5 and PR10 both require a transparent, accessible and culturally sensitive grievance mechanism, so that affected communities can effectively resolve the issues facing them. This includes clear procedures, timely responses to submitted grievances, and their just resolution.	The Law on Expropriation and the Law on Environmental Impact Assessment, as well as several other laws, regulate similar appeal mechanisms in different areas. Publishing and resolving grievances is mandatory in the process of adopting the planning documentation, impact assessment studies, and in the design process. This is a formal process with defined procedures and limited deadlines for receiving grievances. Similarly during the expropriation process, there is a formal procedure that allows	Although the Republic of Serbia has established grievance mechanisms according to various laws, their effectiveness may be limited. The procedures can sometimes be complex, communication channels unclear, and the capacities of relevant institutions for timely and fair resolution may be lacking.	There is no formal grievance process set up for this Project. All grievances related to the expropriation are dealt with as part of the formal expropriation procedure.

Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
		<p>comments and grievances are submitted at each stage of the expropriation process, with defined deadlines for submission of these grievances.</p> <p>Legal remedies are available at every stage of the process.</p>	In the process of expropriation, national legislation recognizes the right to appeal at different stages of the expropriation procedure, but it does not mandate the establishment of a dedicated non-institutional mechanism for resolving grievances.	
<b>Monitoring and evaluation</b>	PR1 and PR5 require a comprehensive monitoring and evaluation program covering all environmental and social aspects of the project, including potential impacts identified during land acquisition.	In the expropriation law, there is no requirement for monitoring of the process or verifying the effectiveness of adopted measures.	Although the legal framework does not foresee requirements for monitoring and evaluation, these measures have already been introduced through the project financing process.	Completion Audit for land acquisition is expected to be conducted following the completion of the expropriation process
<b>Avoidance or minimization of displacement</b>	The PR5 mandates that during planning and design, efforts should be made to avoid or minimize acquisition of land and property, especially those privately owned, and to especially avoid physical displacement. This includes assessing alternative project locations and modifying project solutions.	In the Expropriation Law, there is no explicit requirement to avoid or minimize displacement. Other laws require that planning documentation (spatial plans, regulatory plans) and projects (feasibility studies) must take into account social impacts, including physical displacement. Displacement is often avoided in practice to reduce the costs of expropriation and construction.	<p>There are no specific gaps noted in requirements related to this Project.</p> <p>Physical displacement has been largely avoided by choosing land without residential structures for the project location.</p> <p>The risk of economic displacement is relatively high but expected given the location of the Project in the rural agricultural area.</p>	No further action needed.
<b>Compensations and benefits for displaced persons</b>	The PR5 requires compensation for land, property, and losses related to the renewal of livelihood assets to be determined according to replacement value.	The Law on Expropriation defines fair market value based on data from recent registered sales, according to information from the tax authority and expert assessments. National legislation, besides fair market value, does not define compensation for moving costs, transitional	Due to some discrepancies in the methodology for defining compensation between national legislation and EBRD requirements standards, it is necessary to develop a clear methodology that will be	Proposed measures for bridging the gap between market value and replacement value for land are included in the Corrective Action Plan.

Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
	The emphasis is on the need to restore household and community livelihoods to the level before the onset of displacement.	support, or compensation for loss of income due to displacement (formal and informal).	applied to the Project, in order to avoid neglecting certain factors and to enable the same principle for all owners.	
<b>Planning the resettlement process and livelihood restoration</b>	PR5 requires the development of a Resettlement Action Plan (RAP) for all cases of physical and economic displacement, regardless of the number of affected people	The legislation of Serbia does not prescribe mandatory development of a RAP, regardless of the extent of the expropriation process. The only exception is for specific categories of individuals as defined by the Housing Law. In the case of relocation of these individuals, the mentioned law prescribes the mandatory issuance of a Decision on the necessity of relocation with a relocation plan.	This gap has already been identified. The land acquisition process is well underway and being conducted in line with the national legislation. This Historic land acquisition Audit and the associated Corrective Action Plan are being developed to mitigate the gaps	No further action is required.
<b>Physical displacement</b>	PR5 requires compensation at full replacement cost for lost land and other property, including intangible losses.	Expropriation is carried out in a universal manner defined by law. The market value of the residential property is taken into account, but not the support for re-establishing residential space (there is no fast administrative procedure for permits, licenses, or utility connections). There is no compensation for relocation costs, material and immaterial losses caused by relocation, or transitional support, which can lead to unfair compensation or endangerment of livelihoods. Article 51 of the Expropriation Law provides for the possibility of paying compensation that is higher than the market value, taking into account the material and other personal and family circumstances of the previous owner, if these circumstances are of significant importance for their existence (number of household members, number of household members capable of	There are small differences in the process of defining compensation, particularly in the context of providing additional assistance to households during the resettlement process. Based on preliminary analysis, there is only one residential structure potentially impacted by the project, which is not the primary residence for the owners so no physical displacement is expected for the project. Similarly no economic displacement is expected apart from the land based livelihoods (agricultural production)	The Corrective Action Plan has defined compensation and other measures of additional assistance for the household whose residential property could potentially be impacted, including the time frames in the process of physical relocation, and consultations with the owners at all stages of the process.



Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
		<p>earning a living or employed, health condition of household members, monthly household income, etc.). This article enables the definition of additional assistance to socially vulnerable families who are owners of residential properties, but not to informal owners/users of properties.</p> <p>Recent amendments to the Planning and Construction Law provide for compensation rights for informal residential structures. In the event that the structure existed at the time of adoption of the planning document, the owner of the structure is entitled to the market value of the structure. Other forms of assistance or compensation (relocation costs, transitional allowance, additional assistance due to social status, etc.) are not provided for by the law.</p> <p>The compensation for informal business premises, beyond the compensation based on their construction value prescribed by the law on special procedures (under specific conditions), is not defined.</p>		
<b>Loss of livelihoods</b>	PR5 requires recognition and resolution of all forms of economic displacements, directly or indirectly caused by the implementation of the Project. This implies permanent or temporary loss of access to land or other resources or assets on which income is dependent. In addition to compensation for the loss of land or facilities that are a primary source of income, PR5 also defines transitional	The Expropriation Law provides compensation for loss of income, upon submission of a claim, in the case of the loss of agricultural land cultivation of which is the primary source of income for the previous owner. Compensation takes the form of providing substitute property of the same type and class or corresponding value in the same place or nearby area (Article 15). According to the same article, the former owner whose property was used for livestock breeding or for storage or processing of agricultural products is	In the national legal framework, there often lacks a clear definition of economic displacement, and it may not fully recognize all forms, especially those not directly related to physical land acquisition. While the law recognises that alternative land should be provided to the owner whose primary source of income was agricultural production on the	The Corrective Action Plan offers some measures for livelihood restoration, though support in improved agricultural production on other already owned land (support with investments and training) or through reskilling of the affected PAPs (including engagement on the Project during construction phase activities)

Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
	allowance to cover the time needed to reestablish the lost source of income.	<p>expropriated, and whose income from these activities is a primary source of income, has the right to compensation for another property where they can continue to carry out their activities.</p> <p>The Beneficiary of Expropriation would engage the Ministry of Agriculture to identify suitable publicly owned land to be offered to the previous owner as compensation.</p> <p>According to Article 16 of the expropriation law, the expropriation beneficiary is obliged, upon request, to provide the previous owner of the business premises, ownership or co-ownership of another business premises at the same location or in the vicinity that structurally and in terms of surface area meets the requirements for conducting the activities that the previous owner had before expropriation.</p>	<p>expropriated land, in practice the Ministry of Agriculture rarely provides offers of suitable land in the vicinity.</p> <p>Additionally the article 15 is intended for larger agricultural producers, who have registered agricultural production. It does not recognise producers who produce for subsistence only.</p> <p>National legislation does not recognize transitional allowance for the loss of livelihood.</p>	
<b>Possession of acquired land and related assets</b>	PR 5 notes that the project developers will take possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.	<p>The Expropriation law defines the process for the expropriation of land required for developments that are considered of public interest. Under the Law, expropriation must be completed and all project affected persons compensated in comparable land or in monetary terms, before the Building Permit (or Construction License) is issued to the contractor to mobilise and start the civil works.</p> <p>In the event that a project affected person (s) disagrees with the offered compensation in either form, they can resort to the judicial process, which can take a long time to resolve (due to limited court capacity). To ensure that this process does not delay the</p>	<p>There are provisions in the national legislation that allow the government to take possession of the land even if the PAPs have not received compensation. However the provisions outlined under article 35 are a mechanism that is utilised on an exceptional basis, and the beneficiary of expropriation needs to provide justification for initiating this mechanism.</p>	<p>Considering the nature of the project it is unlikely that the Project will require access to site before compensation has been paid out.</p> <p>The access to site will be required for the land parcels required for the dam construction first. There are currently 5 court cases active within the court procedure, and these are expected to be resolved by the end of the year, i.e. before the start of any construction activities on site.</p> <p>Other court cases and the land parcels that are still within the</p>

Topic	EBRD performance requirements	Requirements according to national legislation	Identified gaps	Corrective measures
		<p>implementation of the project the Law also includes provisions that ensure the Beneficiary of Expropriation gets permission to access to the disputed plots. This is described under Article 35 of the Expropriation law which stipulates that the Beneficiary of Expropriation can request the Ministry of Finance, on an exceptional basis to issue permission to take possession of land without the paid compensation. There is no specific timeframe from when the compensation offer is provided to the PAP to when the Declaration by the Ministry of Finance based on article 35 is issued, but in practice this is typically used as a last resort for the public developers. Even then, article 16 of the Expropriation Law states that temporary replacement accommodation has to be provided to the previous owner, until a permanent solution is agreed, and compensation provided. Forced evictions are not allowed under national legislation, without a substantial prior justification and consultation process. Forced evictions of socially or economically vulnerable persons is only allowed if alternative social housing has been provided.</p>		<p>expropriation process are all associated to the reservoir and will not be impacted until the completion of construction activities on the dam, allowing sufficient time to finalise the expropriation process and complete any court procedures.</p>

The key impacts identified from the land acquisition process for the land required by the Project include:

- Permanent loss of land
- Loss of residential buildings – one uninhabited and one periodically inhabited
- Loss of structures – auxiliary structures (barn, outhouse, fences, paved driveway)
- Loss of crops – forests and orchards
- Loss or reduced livelihoods – inability to continue with agricultural production due to loss of agricultural land
- Reduced reliance on ecosystem services

There will be no businesses or business structures impacted by the Project.

The above listed impacts are expected to be mitigated through the compensation mechanism within the expropriation process, and the corrective actions listed in the Corrective Action Plan.

Loss of agricultural land is considered to have a minor residual impacts for households who are not able to obtain replacement land due to increased prices of land and lack of available agricultural land in the vicinity. While livelihood restoration measures, like training and upskilling (vocational training, English and software courses, training in services and administration...) could be beneficial for some of the younger members of the affected households, it is unlikely that the older members would be interested or able to transition from a traditional agricultural lifestyle.

Historic Land Acquisition audit report with Corrective action plan – includes further details on the status of the expropriation process to date and suggests corrective measures to introduce in order to achieve alignment with EBRD PR5.

**Table 14 - Impact Assessment Table**

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Loss of land	Permanent loss of ownership over land parcels (either cultivated or uncultivated)	Land owners	Major	Medium	Major	<ul style="list-style-type: none"> <li>Replacement land of equal or higher value and similar productivity in direct proximity or in the surroundings of the expropriated land together with all costs of resettlement and administrative fees and tax fees, needed for transfer of ownership rights, if any.</li> </ul> <p>Or</p> <ul style="list-style-type: none"> <li>Compensation at replacement value – market value for replacement land, improvements and labor, plus administrative costs (ownership transfers, permits, etc.). Additional measures to be agreed in order to enable eligible PAPs to acquire replacement land plots, thereby meeting EBRD replacement value requirements</li> <li>Timely consultation</li> </ul>	Minor
Loss of crops	Loss of annual and perennial plants (orchards, vineyards, forests)	Land owners	Moderate	Medium	Moderate	<ul style="list-style-type: none"> <li>Compensation at replacement value – market value of expropriate crops decreased by costs of harvested crops.</li> </ul>	Negligible
Loss of livelihoods	Loss of livelihoods due to loss of land for PAPs who rely on agriculture as a primary or significant source of income <ul style="list-style-type: none"> <li>Inability to continue agricultural production</li> <li>Loss of income from land lease</li> </ul>	Land owners who rely on agriculture as primary or significant source of income	Major	Medium	Major	<ul style="list-style-type: none"> <li>Compensation to ensure PAPs can acquire suitable replacement land. Measures to be developed as part of LRP and agreed support to be provided upon request from eligible PAPs.</li> <li>Livelihood Restoration Measures: provide support to help PAPs restore and, where possible, improve their pre-project livelihoods.</li> </ul>	Minor

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Reduced income from ecosystem services	Impacts on livelihoods from disruption of ecosystem services (fishing, hunting, beekeeping)	Residents of local communities	Minor	Minor	Minor	<ul style="list-style-type: none"> <li>Timely notification of any planned activities that would disrupt the ecosystem services</li> <li>Traffic management and CESMP mitigation measures for dust suppression to be implemented</li> <li>Biodiversity restoration programs to be conducted in order to reestablish previous level of ecosystem services where possible</li> <li>Livelihood diversification programs like skills training, and other measured as per LRP</li> </ul>	Negligible
Disruption to land market	Increased demand for agricultural land from the PAP attempting to acquire replacement land could result in increase in land prices locally	Residents of local communities	Minor	Minor	Minor	<ul style="list-style-type: none"> <li>Compensation at replacement value – market value for replacement land, improvements and labor, plus administrative costs (ownership transfers, permits, etc.). Additional measures to be agreed in order to enable eligible PAPs to acquire replacement land plots, thereby meeting EBRD replacement value requirements</li> <li>Timely consultations</li> <li>Livelihood diversification programs like skills training</li> </ul>	Negligible
Loss of access to property and services	Temporary loss of access to property and services due to disconnected local and rural roads	Communities within the area of active construction works	Minor	Medium	Minor	<ul style="list-style-type: none"> <li>Traffic management plan with alternative routes</li> <li>Timely notifications to local communities prior to disruptions</li> <li>Provision of alternative access / restoring access</li> </ul>	Negligible
Damage to property from construction activities	Construction activities outside of site boundaries (Construction machines, works, excess deposit) impacting privately owned property:	Communities within the area of active construction works	Moderate	Medium	Moderate	<ul style="list-style-type: none"> <li>Traffic management Plan to be developed by Contractor which includes regular training for truck and machine operators</li> </ul>	Negligible

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
	<ul style="list-style-type: none"> <li>- Encroachment and damage to crops</li> <li>- Damage to structures (fences, irrigation systems, etc.)</li> </ul> <p>Damage to public property (public roads, etc.)</p>					<ul style="list-style-type: none"> <li>• Operational Grievance redress mechanism and Stakeholder Engagement Plan</li> <li>• Compensation to be provided for any property damage by Contractor in accordance with provisions of Entitlement Matrix included in LRP.</li> </ul>	
Loss of agricultural yield	<p>Construction activities causing loss of yield in neighbouring fields:</p> <ul style="list-style-type: none"> <li>- Soil contamination</li> <li>- Air contamination (dust)</li> </ul>	Communities within the area of active construction works	Minor	Medium	Minor	<ul style="list-style-type: none"> <li>• Compensation to be provided for any damage caused by construction activities in accordance with provisions of Entitlement Matrix included in LRP</li> <li>• Implementation of dust suppression and pollution prevention measures</li> <li>• Operational Grievance Redress Mechanism</li> </ul>	Negligible
Temporary land acquisition	<p>Onerous and unfavourable clauses included in lease contracts;</p> <p>Compensation not in line with PR5</p>	Owners of land	Moderate	Medium	Moderate	<ul style="list-style-type: none"> <li>• Temporary land acquisition procedure to be developed by Contractor to ensure that all lease contracts are in place and payments are made prior to access to land in accordance with the agreed entitlement matrix</li> <li>• Procedure to requirements for pre-entry and exist surveys signed by the landowner and witnessed by PWMC Srbijavode.</li> </ul>	Negligible
Temporary land acquisition	Failure to reinstate the land to original condition following	Owners of land	Major	Medium	Moderate	<ul style="list-style-type: none"> <li>• Provisions in lease contract to reinstate the land to original condition (limited duration of lease, entitlements, reinstatement to previous condition/agreed improvement, etc.)</li> </ul>	Negligible



Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Ageing population and lack of employment opportunities	Predominantly elderly population unable or disinterested to transition away from agriculture as primary source of employment	Previous land owners	Minor	Medium	Minor	<ul style="list-style-type: none"> <li>Livelihood Restoration Measures: provide support to help PAPs restore and, where possible, improve their pre-project livelihoods.</li> </ul>	Negligible

**Table 15 – Mitigation and Monitoring**

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Loss of land	Permanent loss of ownership over land parcels (either cultivated or uncultivated)	Land owners	<ul style="list-style-type: none"> <li>Srbijavode to ensure the expropriation process is completed and that any residual actions from the Corrective Action Plan and LRP are implemented</li> <li>Contractor to notify the land owners of any activities on land at least 30 days prior to start of activities</li> </ul>	<ul style="list-style-type: none"> <li>Pre-Construction Phase</li> <li>At the start of construction activities</li> </ul>
Loss of crops	Loss of annual and perennial plants (orchards, vineyards, forests)	Land owners	<ul style="list-style-type: none"> <li>Srbijavode to ensure the expropriation process is completed and that any residual actions from the Corrective Action Plan and LRP are implemented</li> <li>Contractor to notify the land owners of any activities on land at least 30 days prior to start of activities. Where feasible, the timing of land vacation should allow for harvesting of standing crops.</li> </ul>	<ul style="list-style-type: none"> <li>Pre-Construction Phase</li> <li>At the start of construction activities</li> </ul>
Loss of livelihoods	Loss of livelihoods due to loss of land for PAPs who rely on agriculture as a primary or significant source of income <ul style="list-style-type: none"> <li>Inability to continue agricultural production</li> <li>Loss of income from land lease</li> </ul>	Land owners who rely on agriculture as primary or significant source of income	<ul style="list-style-type: none"> <li>Srbijavode to ensure the expropriation process is completed and that any residual actions from the Corrective Action Plan and LRP are implemented</li> <li>Srbijavode to ensure livelihood restoration measures noted in the Corrective Action Plan and LRP are properly advertised</li> <li>Contractor to develop and implement the local employment strategy</li> </ul>	<ul style="list-style-type: none"> <li>Pre-Construction Phase</li> <li>Pre-Construction Phase</li> <li>Throughout the Construction Phase</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Reduced income from ecosystem services	Impacts on livelihoods from disruption of ecosystem services (fishing, hunting, beekeeping)	Residents of local communities	<ul style="list-style-type: none"> <li>Contractor to establish communication with the local organisations and ensures the Project related activities that would disrupt the ecosystem services are timely announced.</li> <li>Contractor to implement dust suppression measures for traffic and construction activities</li> <li>Biodiversity restoration programs to be conducted in order to reestablish previous level of ecosystem services where possible</li> <li>Srbija vode to ensure that any residual actions from the Corrective Action Plan are implemented</li> <li>Srbijavode to ensure livelihood restoration measures noted in the Corrective Action Plan and LRP are properly advertised</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the Construction Phase</li> <li>Throughout the Construction Phase</li> <li>Throughout the Construction Phase</li> <li>Pre-Construction Phase</li> <li>Pre-Construction Phase</li> </ul>
Disruption to land market	Increased demand for agricultural land from the PAP attempting to acquire replacement land could result in increase in land prices locally	Residents of local communities	<ul style="list-style-type: none"> <li>Srbijavode to ensure the expropriation process is completed and that any residual actions from the Corrective Action Plan and LRP are implemented</li> <li>Srbijavode to ensure livelihood restoration measures noted in the Corrective Action Plan and LRP are properly advertised</li> </ul>	<ul style="list-style-type: none"> <li>Pre-Construction Phase</li> <li>Pre-Construction Phase</li> </ul>
Loss of access to property and services	Temporary loss of access to property and services due to disconnected local and rural roads	Communities within the area of active construction works	<ul style="list-style-type: none"> <li>Traffic management Plan to be developed by Contractor and advertised to the local community</li> <li></li> <li>Contractor to notify the land owners of any activities on land at least 30 days prior to start of activities</li> </ul>	<ul style="list-style-type: none"> <li>Upon contract award, but no later than the start of construction activities</li> <li>Throughout the Construction Phase</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Damage to private property from construction activities	Construction activities outside of site boundaries (Construction machines, works, excess deposit) impacting privately owned property: <ul style="list-style-type: none"> <li>- Encroachment and damage to crops</li> <li>- Damage to structures (fences, irrigation systems, etc.)</li> </ul>	Communities within the area of active construction works	<ul style="list-style-type: none"> <li>• Traffic management Plan to be developed by Contractor which includes regular training for truck and machine operators</li> <li>• Contractor to establishing the baseline condition of all public and private property in the vicinity of project areas</li> <li>• Grievance redress mechanism to be established and implemented by Contractor</li> <li>• Compensation to be provided for any property damage by Contractor.</li> <li>• Overview of the implemented actions to be included in the Contractors progress reports</li> </ul>	<ul style="list-style-type: none"> <li>• Upon contract award, but no later than the start of construction activities</li> <li>• Upon contract award, but no later than the start of construction activities</li> <li>• Upon contract award, but no later than the start of construction activities</li> <li>• Throughout the Construction Phase</li> <li>• Monthly Progress Reports</li> </ul>
Loss of agricultural yield	Construction activities causing loss of yield in neighbouring fields: <ul style="list-style-type: none"> <li>- Soil contamination</li> <li>- Air contamination (dust)</li> </ul>	Communities within the area of active construction works	<ul style="list-style-type: none"> <li>• Contractor to establishing the baseline before the start of construction activities</li> <li>• Contractor to implement dust suppression and pollution prevention measures</li> <li>• Grievance redress mechanism to be established and implemented by Contractor</li> <li>• Mechanism for compensation for damage caused to be established and implemented by Contractor</li> </ul>	<ul style="list-style-type: none"> <li>• Upon contract award, but no later than the start of construction activities</li> <li>• Throughout the Construction Phase</li> <li>• Upon contract award and throughout the construction phase</li> <li>• Upon contract award and throughout the construction phase</li> </ul>
Temporary land acquisition	Additional compensation / income for land owners renting out their land to Contractor / subcontractor	Owners of land	<ul style="list-style-type: none"> <li>• Contractor to develop temporary land acquisition procedure</li> <li>• Contractor to ensure that all lease contracts are in place and payments are made prior to access to land</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Throughout the Construction Phase</li> <li>• Throughout the Construction Phase</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Temporary land acquisition	Failure to reinstate the land to original condition following	Owners of land	<ul style="list-style-type: none"> <li>Contractor to ensure that all lease contracts are in place and payments are made prior to access to land,</li> <li>Contractor to reinstate the land to original condition</li> <li>Compensation for any damages to the property evaluated at replacement cost</li> </ul>	<ul style="list-style-type: none"> <li>Throughout the Construction Phase</li> <li>Throughout the Construction Phase</li> </ul>
Ageing population and lack of employment opportunities	Predominantly elderly population unable or disinterested to transition away from agriculture as primary source of employment	Previous land owners	<ul style="list-style-type: none"> <li>Srbijavode to ensure the expropriation process is completed and that any actions from the Corrective Action Plan and LRP are implemented</li> <li>Srbijavode to ensure livelihood restoration measures noted in the Corrective Action Plan and LRP are properly advertised</li> </ul>	<ul style="list-style-type: none"> <li>Pre-Construction Phase</li> <li>Pre-Construction Phase</li> </ul>

## 4. Stakeholder Engagement

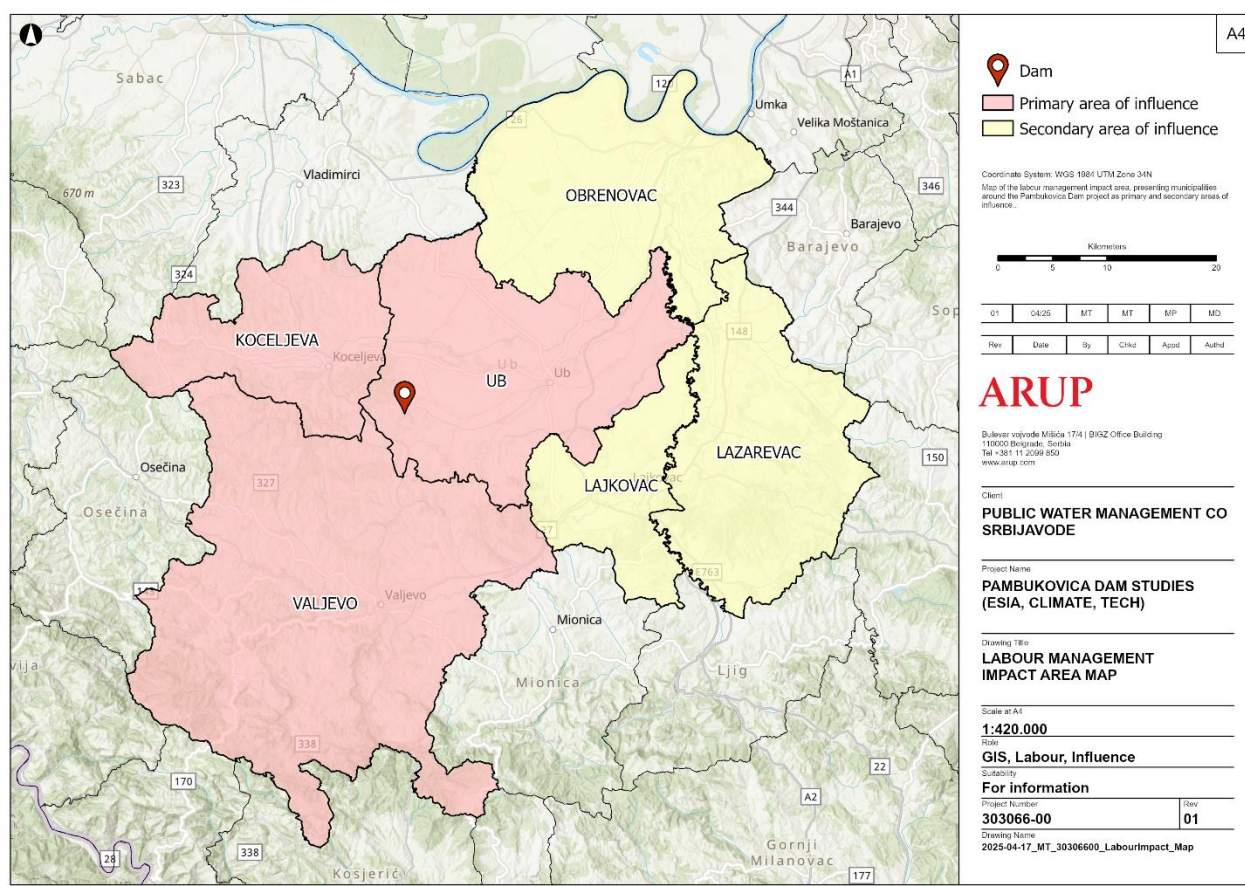
### 4.1 Introduction and Purpose

This chapter includes the overview of the risks and impacts associated with stakeholder engagement related to the Project. Some stakeholder engagement activities have already taken place however with the Project nearing the construction stage it is important to reflect on the capacities needed to ensure that the consultation and stakeholder engagement for the Project are conducted in line with the national legislation and EBRD requirements, in particularly PR10.

This chapter provides a brief overview of the planned actions, but a more detailed review of stakeholder engagement activities is presented in the Stakeholder Engagement Plan which is presented separately as part of the ESIA package.

### 4.2 Receptors and Area of Influence

The area of influence with regard to stakeholder engagement aligns with the area of influence for land acquisition and the labour impacts. The area 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 8 - Area of Influence – stakeholder engagement**

## 4.3 Legislation and Standards

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 has been identified and listed based on the Project scale, nature, and the agreed-upon scope of the Project assessment.

### 4.3.1 National legislation

Below is selection of main national legislation relevant to the topic of stakeholder engagement in Serbia, which will be considered for this Assignment:

- Law on Public Companies (Official Gazette of the RS No 15/2016 and 88/2019)
- The Law on the Planning System of the Republic of Serbia (“Official Gazette of RS, No. 30/2018”)
- Law on Environmental Impact Assessment. (Official Gazette of RS, No. 135/2004, 36/2010)
- 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 General Administrative Procedure (Official Gazette of the RS No. 18/2016, 95/2018)
- Law on Public Information and the Media (Official Gazette of the RS, No.92/2023 and 51/2025)

- The 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)
- Ordinance on capital projects ("Official Gazette of RS", No. 79/2023)
- 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)
- Regional spatial plan for Kolubara and Mačva administrative zone ("Official Gazette of RS", No.11/2015)
- Spatial Plan of the Municipality of Ub ("Official Gazette of the Municipality of Ub", No. 13/12)
- 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)

Document	Description
Law on Public Companies ("Official Gazette of the RS No 15/2016 and 88/2019")	
The Law on the Planning System of the Republic of Serbia ("Official Gazette of RS, No. 30/2018") <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/30/1/reg</a>	This law regulates the planning system of the Republic of Serbia, including the management of the public policy system and medium-term planning. It defines the types and contents of planning documents that all participants in the planning system propose, adopt, and implement according to their competencies. It also addresses the mutual alignment of planning documents, the procedure for determining and implementing public policies, the obligation to report on the implementation of planning documents, and the corresponding application of the obligation to conduct impact analyses on regulations and evaluate the effects of these regulations.
Law on Strategic Environmental Impact Assessment ("Official Gazette of the Republic of Serbia", No. 94/2024) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/28/reg</a>	This law regulates the conditions, methods, and procedures for assessing the impact of certain plans and programs on the environment (strategic assessment), aiming to protect the environment and promote sustainable development by integrating fundamental principles of environmental protection into the process of preparing and adopting plans and programs.
The Environmental Impact Assessment Law ("Official Gazette of the Republic of Serbia", No. 94/2024) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/29/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2024/94/29/reg</a>	This law regulates the conditions, manner, and procedure for assessing the impact of certain plans, programs, and projects on the environment. Additionally, it governs the scope and content of spatial, urban planning, and technical documentation.
The Law on Planning and Construction ('Official Gazette of the Republic of Serbia', no. 72/2009, 81/2009 - corr., 64/2010 - decision of the Constitutional Court, 24/2011, 121/2012, 42/2013 - decision of the	This law regulates the conditions and manner of spatial planning, development, and use of construction land and facilities, supervision over the implementation of the provisions of this law



Document	Description
Constitutional Court, 50/2013 - decision of the Constitutional Court, 98/2013 - decision of the Constitutional Court, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other law, 9/2020, 52/2021 and 62/2023) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2009/72/11/reg</a>	and inspection supervision, as well as other important issues related to spatial planning, development, and use of construction land and facilities. It should also be noted that according to Article 134a of this law, an investor investing in the construction of linear infrastructure facilities of special significance for the Republic of Serbia is obliged to provide the owner of a residential building constructed before the spatial plan designating the land for public purposes came into force, with another suitable residential building or apartment, regardless of whether proceedings for the legalization of that building have been initiated, or to pay them monetary compensation in the amount necessary to provide another suitable residential building or apartment.
The Law on General Administrative Procedure ("Official Gazette of the Republic of Serbia", No. 18/2016, 95/2018 - authentic interpretation, and 2/2023 - decision of the Constitutional Court) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2016/18/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2016/18/2/reg</a>	The administrative procedure represents a set of rules that state authorities and organizations, bodies and organizations of provincial autonomy, bodies and organizations of local self-government units, institutions, public enterprises, special bodies through which regulatory functions are exercised, and legal and natural persons entrusted with public authorities (authorities) apply when resolving administrative matters.
Law on Public Information and the Media ("Official Gazette of the RS", No.92/2023 and 51/2025) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2023/92/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2023/92/2/reg</a>	This law regulates the manner of exercising the freedom of public information, which specifically includes the freedom to collect, publish, and receive information, the freedom to form and express ideas and opinions, the freedom to print and distribute newspapers, the freedom to produce, provide, and publish audio and audiovisual media services, the freedom to disseminate information and ideas via the internet and other platforms, as well as the freedom to publish media and engage in public information activities.
The 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) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2025/20/5/reg</a>	This regulation specifies the methodology for managing public policies in detail, particularly the scope, process, and control of impact analysis during the creation of public policy documents, as well as the analysis of impacts after their adoption. It includes the procedures for conducting consultations and public discussions on public policy documents, the content and form of public policy documents, the elements of impact analysis of adopted public policy documents, the method of reporting on the results of public policy implementation, the method of evaluating public policy effects, and the areas of planning and implementing public policies.
Ordinance on capital projects ("Official Gazette of RS", No. 79/2023)	This regulation further specifies the content, method of preparation, evaluation, readiness

Document	Description
<a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2023/79/1/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/vlada/uredba/2023/79/1/reg</a>	assessment, and selection of capital projects, monitoring of implementation, performance reporting, and evaluation of all positive and negative effects of capital projects, with the aim of effective and efficient management of public funds
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") <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2019/32/2/reg</a>	This rulebook specifies in detail the content, method, and procedure for drafting spatial and urban planning documents.
The Rulebook on the Content of the Environmental Impact Assessment Study ("Official Gazette of RS", No. 69/05) <a href="https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg">https://pravno-informacioni-sistem.rs/eli/rep/sgrs/ministarstva/pravilnik/2005/69/6/reg</a>	This rulebook specifies in detail the content of the request for deciding the need for an impact assessment and the content of the request for determining the scope and content of the environmental impact assessment study.

#### 4.3.2 EBRD Requirements

EBRD E&S Performance Requirements relevant to labour management

- PR1 - Assessment and Management of Environmental and Social Impacts and Issues;
- PR10 - Information Disclosure and Stakeholder Engagement.

#### 4.3.3 Regional and global standards and requirements

Following regional and global standards and requirements will be taken into consideration as part of the Project assessment:

- EIA Directive – Environmental Impact Assessment (Directive 2014/52/EU)
- 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
- National obligations under international law (including the Espoo Convention)
- World Bank Group Environmental, Health, and Safety (EHS) Guidelines
- EBRD Paris Agreement alignment methodology

### 4.4 Methodology

The assessment of stakeholder engagement includes an overview of the previous stakeholder engagement activities conducted to date, as well as a review of other Project specific documentation to assess the risks and benefits of stakeholder engagement in the next stages of Project implementation. The assessment relied on a review of secondary data sources, including project documentation, publicly available data, and applicable legislation and standards relevant to stakeholder engagement, as well as collection of primary data through survey of the affected communities. In addition, the assessment considered broader contextual risks, including socio-political sensitivities and public sentiment, which are particularly relevant given the current situation in Serbia.

The assessment was conducted in line with the overall methodology for the ESIA as presented in BOOK 1 Introduction.

The collection and processing of baseline data presented in this chapter has been done through a number of methods, including:

- Desktop review and analyses of the documentation previously published, including the spatial plans and regulation plans adopted for the project
- Desktop review and analyses of other publicly available data from various sources, including a media search of the Project online
- Feedback obtained during stakeholder meetings held with representatives of the municipalities Ub and Valjevo
- Data collected through the survey of households in the Project area, focussing on cadastre municipalities directly impacted by the Project (CM Pambukovica, Radusa, Slatina and Gola Glava) as well as neighbouring cadastre municipalities, who might be indirectly affected by Project activities, and could be included in phase II of the project (irrigation system)

The main documents reviewed as part of this assessment include:

- Expropriation study developed by Energoprojekt-Hidroinzenjering a.d. dated Feb 2020.
- Updated Expropriation Study developed by Andzor inzenjering d.o.o. dated Apr 2022.
- The Environmental Impact Assessment (EIA), approval date June 10, 2020.
- Project design for the Building Permit
- Spatial and Regulation Plans:
  - Regional spatial plan for Kolubara and Mačva administrative zone ("Official Gazette of RS", No.11/2015), Spatial Plan of the Municipality of Ub ("Official Gazette of the Municipality of Ub", No. 13/12), Detailed Regulation Plan for "Pambukovica Dam on the River Ub" ("Official Gazette of the Municipality of Ub", No. 30/16), and 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).

As part of our ongoing ESIA development, Arup has actively engaged stakeholders. The primary data collections included interviews with key stakeholders:

- Over the period from Oct – December 2024 several meetings were held with the representatives of Srbijavode to discuss executed and planned stakeholder engagement activities
- Meetings with representatives of the legal and land rights departments in the municipalities of Ub (November 29, 2024) and Valjevo (November 28, 2024). These meetings served to collect the data on public and individual consultations with the PAPs and to get a better understanding of the feedback from the local communities on the land acquisition process; awareness of the Project, and any questions that were raised by the communities

During the first two weeks of December 2024, structured interviews for an initial socio-economic survey were conducted with a sample of the project affected persons, the results of which are presented later in the document. A total of 84 participants were included in the survey – 34 PAPs and 50 residents who are not directly impacted by the land acquisition for the project. Through the survey we collected information about

- their general level of awareness of the Project,
- knowledge about Project specifics (since there have been variations of the project in the last 20-30 years)
- their attitudes towards the project

- familiarity with the chain of responsibility
- any grievances they have about the Project
- awareness of any previous stakeholder engagement activities
- preferred methods for communication and disclosure of information going forward

A total of 79 relatively fully completed questionnaires (including 29 PAPs and 50 local residents) were analysed for the SIA report following completion of initial survey. However, to improve representativeness of initial sample and ensure a comprehensive picture of project impact on PAPs and local residents is captured, an additional survey of PAPs will be conducted during the ESIA public disclosure period, along with the discussions in focus groups. This report will be updated following completion of the additional survey activities.

## 4.5 Assumptions and limitations (if applicable)

Limited engagement from community representatives – village representatives were interviewed and provided general information about the social patterns and economic activities in the village, however there was limited support at Municipality level.

## 4.6 Baseline

### 4.6.1 Media search results

A media search of the Project identified the following results. 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<sup>14</sup> 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. A strategic environmental impact assessment<sup>15</sup> is mentioned, as well as potential financing from the Abu Dhabi Fund and the EBRD. The information regarding construction notes that the start of construction activities is set 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.

**Table 16 – Media search results**

LINK	TITLE	DESCRIPTION	DATE
<a href="https://www.euronews.rs/srbija/drustvo/123684/de-cenija-od-velikih-majskih-poplava-u-srbiji-postoji-li-strah-da-2014-godina-moze-da-se-ponovi/vest">https://www.euronews.rs/srbija/drustvo/123684/de-cenija-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

<sup>14</sup> Available Pambukovica Dam Project documentation does not consider water supply as part of its scope, purpose or objective. Information quoted in media might have been misinterpreted or taken out of context.

<sup>15</sup> The Consultant has not identified that strategic environmental impact assessment has been developed.

LINK	TITLE	DESCRIPTION	DATE
<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 (Puzović: <i>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
<a href="https://www.ekapija.com/news/3826480/where-to-invest/infrastructure/star-t-up/index">https://www.ekapija.com/news/3826480/where-to-invest/infrastructure/star-t-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

LINK	TITLE	DESCRIPTION	DATE
<a href="https://patak.co.rs/predstavljen-projekat-brane-pambukovica/">https://patak.co.rs/predstavljen-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/cc/clanak/471863/Brana-za-zastitu-i-navodnjavanje-Tamnave">https://www.politika.rs/cc/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>"Брана „Pambukovica“ на реци 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 secured in the budget of the municipality of Ub.	20 July 2016

#### 4.6.2 Results from the survey

As mentioned in Section 4.3, the sampling for initial survey was carried out on randomised basis, leaning more heavily on the households whose property would be expropriated for the Project (the survey was conducted in November 2024). A total of 84 households were interviewed – 34 PAPs and 50 general population.

General population survey was carried out to get a general impression of the interest of the various local populations for the potential second phase of the project which stipulated the development of an irrigation system from the dam, to support local agricultural production which is quite water insecure.

An overview of the results of the data collected through the survey is presented below. A total of 79 relatively fully completed questionnaires were used for data analysis in the SIA.

Review of answers from PAPs regarding the expropriation process indicates some gaps in communication and information dissemination. Notably, 64.56% of respondents reported that they first learned about the expropriation from their neighbours (this includes 69.09% of male and 54.17% of female respondents). This reliance on informal channels highlights potential weaknesses in the official communication process and raises concerns about the accuracy of information being shared within the community.

Around 16.45% of respondents (all among PAPs who experience direct land acquisition impacts) indicated that they were informed through official summons from their Municipality, which suggests that while some did receive formal notification, the dissemination of these notifications was not coordinated, and the majority of PAPs were already made aware of the expropriation informally, before receiving any notification from formal channels. This includes 14.55% of all male and 20.83% of all female respondents.

Additionally, 15.18% % learned of the expropriation by encountering official surveyors in their fields (this includes 12.73% of all male and 20.83% of all female respondents). Moreover, 3.80% % learned information about project from newspapers and radio (this includes 5.64% of all male and 4.17 fo all female respondents), This mode of communication is somewhat passive and reflects a lack of proactive communication from project proponents.

The predominance of learning about expropriation through neighbours indicates a significant need for improved communication strategies.

Only 2.53% of interviewed PAPs stated that they had participated in the consultations organized by Srbijavode in the Municipality Ub, indicating a lack of active involvement from most of the community (this includes 2 PAPs comprising 3.64% of male respondents).

A further 11.39% of respondents acknowledged awareness of the public consultations but chose not to participate for various reasons, suggesting barriers to engagement that might include lack of time, information, or perceived relevance (this included 14.55% of male and 4.17% of female respondents). 27.85% of PAPs (including 20.00% of male and 45.83% of female respondents) indicated that they were unaware that any consultations took place, signalling a substantial communication gap. Additionally, 58.23% reported that they were unaware of consultations or expressed a lack of interest in participating in public consultations, which may reflect either disengagement or dissatisfaction with the consultation process (this included 61.12% of male and 50.00% of female respondents).

With respect to participation in consultation carried out as a part of land expropriation process, a separate question was included in the questionnaire completed for PAPs with direct land acquisition impacts. The data presented further in this section is based on analysis of information for 29 PAPs, for who detailed questionnaires were completed (these questions were not included in the database available for 50 local residents who are not directly impacted by land acquisition).

As is stated in HLA CAP, this situation highlights the need for more effective outreach and communication strategies. The fact that 37.93% of respondents reported learning about the



expropriation through official summons from their Municipality suggests that while formal notifications exist, they are not sufficient to ensure comprehensive community awareness and engagement. Moreover, the reliance on informal sources, particularly neighbours, for information about expropriation further emphasizes the need to improve efficiency of official communication channels.

As reasons for non-participating in the public consultations PAPs provided the following replies:

- 37.93% of respondents stated that the consultations were not held at appropriate times, suggesting that scheduling may not be conducive to community participation (this includes 45.46% of male and 14.29% of female respondents).
- 10.34% reported that the consultations were physically too far away from their location, indicating accessibility issues that prevent attendance (this includes 13.64% of male respondents).
- 20.69% expressed limited interest in the consultations, which raises questions about the perceived value and relevance of these meetings to the community, and trust in the institutions (this includes 18.18% of male and 28.57% of female respondents).
- 6.90% of PAPs chose not to share their opinions regarding participation, reflecting a degree of disengagement or uncertainty (this includes 4.54% of male and 14.29% of female respondents).
- 6.90% cited reasons related to age, health, or a lack of information as barriers that deterred them from participating (this includes 28.57% of female respondents).
- 13.79% reported that they were not aware of consultations (this includes 13.64% of male respondents).

The assessment of information provided to the PAPs regarding the expropriation process indicates some gaps in this aspect of communication as well. The responses show:

- 3.45% of PAPs (14.29% of female respondents) expressed uncertainty about how well-informed they were regarding the expropriation process.
- 37.93% stated that they were poorly informed, suggesting that while they have some awareness, it is insufficient for understanding the implications of the expropriation (this includes 40.01% of male and 28.57% of female respondents).
- 58.62% reported feeling uninformed about the process, indicating a critical gap in knowledge that could lead to confusion and dissatisfaction among the affected population (this includes 59.09% of male and 57.14% of female respondents).

These findings seemingly highlight a substantial gap in the dissemination of information critical to understanding the expropriation process. In the notification on expropriation, the owners are invited to attend individual consultations, where they are provided with the information about the project, their land in relation to the Project area (with maps), the provisions of the expropriation law and the next steps in the process, along with any legal remedies they are entitled to. This information is shared in the documents they are provided during these meetings (the details of the information provided to PAPs will be verified during the additional surveys).

When asked how they would prefer the information is shared with them in the future, the preferences for how PAPs would like to receive updates and information are as follows:

- 62.07% of respondents indicated that they have no strong preference regarding the means of communication, suggesting a level of flexibility in how they receive information (this includes 63.64% of male and 57.14% of female respondents).
- 17.24% were unsure about how they would like to be informed (this includes 13.64% of male and 28.57% of female respondents).
- 13.79% expressed a desire for organized meetings within their Local Community, reflecting a preference for direct engagement and dialogue (this includes 13.64% of male and 14.29% of female respondents).
- Another 6.90% preferred receiving information through a notice board in their community, demonstrating interest in having centralized, visible updates (this includes 9.09% of male respondents).

These findings illustrate that while many respondents are indifferent to the specific modes of communication, there are still notable preferences for certain channels.

With regards to the preferred frequency for dissemination of information, the majority (62.07% of respondents) expressed indifference regarding how often they would like to be informed about the project (this includes 63.64% of male and 57.14% of female respondents). 6.90% each indicated a preference for being informed every three months or as often as possible without specifying precise timeline (in both cases this includes 9.09% of male respondents), and another 6.90% expressed a wish to receive information on a monthly basis, reflecting a desire for more consistent engagement (this includes 4.55% of male and 14.29% of female respondents). Conversely, 17.24% indicated that they did not care about being informed at all, further emphasizing the range of engagement levels within the community (this includes 13.64% of male and 28.57% of female respondents).

Category	Percentage of Respondents	Percentage of all Male Respondents	Percentage of all Female Respondents
<b>Method of Learning About Expropriation</b>			
Neighbors	64.56%	69.09%	54.17%
Official summons from Municipality	16.45%	14.55%	20.83%
Encountered official surveyors	15.18%	12.73%	20.83%
<b>Public Consultation Participation</b>			
Participated	2.53%	3.64%	-
Aware but did not participate	11.39%	14.55%	4.17%
Unaware of consultations	27.85%	20.00%	45.83%
Not interested in participating	58.23%	61.12%	50.00%
<b>Reasons for Non-Participation</b>			
Poor timing	37.93%	45.46%	14.29%
Distance	10.34%	13.64%	-

Category	Percentage of Respondents	Percentage of all Male Respondents	Percentage of all Female Respondents
Lack of interest	20.69%	18.18%	28.57%
Not wanting to share opinion	6.90%	4.55%	14.29%
Physical limitations (medical conditions)	6.90%	-	28.57%
Not aware	13.79%	13.64%	-
<b>Assessment of Information Provided</b>			
Unsure	3.45%	-	14.29%
Poorly informed	37.93%	40.01%	28.57%
Uninformed	58.62%	59.09%	57.14%
<b>Preferred Information Frequency</b>			
Indifferent to frequency	62.07%	63.64%	57.14%
Uncertain (the more frequent the better)	6.90%	9.09%	-
Every three months	6.90%	9.09%	-
Monthly	6.90%	4.55%	14.29%
Unconcerned about information	17.24%	13.63%	28.57%
<b>Preferred Means of Information Dissemination</b>			
Indifferent to means	62.07%	63.64%	57.14%
Uncertain	17.24%	13.64%	28.57%
Notice board in the community	6.90%	9.09%	-
Organized meetings in Local Community	13.79%	13.64%	14.29%

### Awareness of Phase II - Irrigation System

The data analyzed in this section includes data from all 79 questionnaires. The overwhelming majority of the interviewed persons, 89.87%, stated that they were not aware of any planned irrigation Project (this includes 89.09% of male and 91.67% of female respondents), while 10.13% said that they had heard something along those lines, but were not sure what the Project entailed when it comes to irrigation (this includes 10.09% of male and 8.33% of female respondents).

Once notified of the planned irrigation project, majority 67.09% expressed interest in being connected to the newly built irrigation system (this includes 74.55% of male and 50.00% of female respondents), while 32.91% said that they were not interested in connecting to it. The responses regarding concerns related to the irrigation system highlight the following:

- A significant 27.85% of respondents expressed concern about the price of the utility connection point between their properties and the irrigation system (this includes 30.91%

of male and 20.83% of female respondents). This indicates a prevalent worry regarding the potential financial burden of connecting to the irrigation infrastructure.

- 18.99% of respondents voiced concerns about the ongoing monthly costs associated with using the irrigation system (this includes 20.00% of male and 16.67% of female respondents). This suggests that, beyond initial connection fees, there is apprehension about the long-term affordability of maintaining access to the irrigation resources.
- A smaller portion of 2.53% noted concerns that the irrigation system might increase the price of land, reflecting anxiety that enhancements to irrigation could inadvertently affect land market dynamics negatively (this includes 3.63% of male respondents).
- A total of 5.06% indicated worries about the health quality of the water used in the irrigation system, highlighting the importance of safe and reliable water sources for agricultural activities and food safety (this includes 7.27% of male respondents).
- 43.04% of respondents reported no concerns whatsoever regarding the irrigation system, which indicates that a notable segment of the community may view the system positively or remain indifferent to potential issues (this includes 34.55% of male and 62.50% of female respondents).
- Remaining 2.53% of respondents (including 3.64 % of male respondents) is not interested in connecting to irrigation system.

The analysis of current irrigation sources among PAPs reveals significant reliance on traditional water extraction methods:

- A substantial 68.35% of respondents indicated that they currently use wells as their primary source of water for irrigation (including 69.09 % of male and 66.67% of female respondents). This reliance on groundwater underscores the importance of well systems in supporting local agricultural practices.
- 3.80% noted that they utilize local bodies of water for irrigation, suggesting the availability of surface water sources that are accessible for agricultural purposes (this includes 5.45% of male respondents).
- 10.12% mentioned transporting water from a separate location using cisterns or other means, which indicates additional logistical challenges and costs associated with accessing irrigation water (this includes 7.27% of male and 16.67% of female respondents).
- Finally, 17.72% of respondents stated that they have no need for irrigation, potentially reflecting either a lack of cultivation requiring irrigation or specific agricultural practices that do not rely on water management (this includes 18.18% of male and 16.67% of female respondents).

These findings highlight the predominant reliance on wells for irrigation, suggesting that the community may face challenges related to water availability and sustainability, particularly in light of potential changes brought by the Pambukovica dam project.

Category	Percentage of Respondents	Percentage of all Male Respondents	Percentage of all Female Respondents
<b>Awareness of Irrigation Plans</b>			
Aware	10.13%	10.91%	8.33%
Not aware	89.87%	89.09%	91.67%

Category	Percentage of Respondents	Percentage of all Male Respondents	Percentage of all Female Respondents
<b>Interest in Irrigation System</b>			
Interested	67.09%	74.55%	50.00%
Not interested	32.91%	25.45	50.00%
<b>Concerns Regarding Irrigation</b>			
Price of utility connection	27.85%	30.91%	20.83%
Monthly usage cost	18.99%	20.00%	16.67%
Increased price of land	2.53%	3.63%	-
Water quality for irrigation	5.06%	7.27%	-
No concerns	43.04%	34.55%	62.50%
<b>Current Irrigation Source</b>			
Wells	68.35%	69.09%	66.67%
Local bodies of water	3.80%	5.45%	-
Transporting water	10.12%	7.27%	16.67%
No need for irrigation	17.72%	18.18%	16.67%

## 4.7 Project Activities and Identification of Impacts

### 4.7.1 Pre-Construction Phase

Stakeholder engagement activities in the Pre-construction stage relate primarily to the land acquisition process as well as regular and timely notification to the general public about the status of project documentation – studies and permits, as well as general announcements on the expected start of construction activities. This phase also includes the ESIA disclosure and consultation process, which serves as a proactive outreach to affected communities to share information on identified risks, impacts, and proposed mitigation measures, and to collect feedback that can be integrated into project planning.

### 4.7.2 Construction Phase

During construction phase the Contractor and Srbija Vode will need to have an active engagement with the local communities to disseminate information about Project area, planned activities, disruption in services and access. Active grievance management by the Contractor is crucial at this stage due to significant construction related nuisances to the local community – increased traffic, increased levels of noise and vibration from machines and trucks, dust pollution, mud on the roads, etc., as well as accidental encroachment on private property, and damage to private and public property (local roads).

Formal engagement with national agencies and inspections regarding compliance with the issued permits.

#### **4.7.3 Operation Phase**

During this phase the engagement with the local communities is expected to be limited to activities related to health and safety of the local population, as well as addressing any grievances related to the operation of the dam.

#### **4.7.4 Decommissioning Phase**

Activities during the decommission phase are similar to the construction phase, and community engagement will primarily be focussed on addressing community grievances from construction activities.

### **4.8 Impact Assessment and Mitigation (including all project phases, pre-construction, construction, operation, decommissioning)**

The main impacts identified with regards to stakeholder engagement revolves around maintaining communications with local authorities and communities. The main stakeholder engagement responsibility lies with Srbijavode, which is tasked with the overall coordination and implementation of the SEP developed as part of the ESIA package. This includes leading engagement with local authorities and communities, disclosing project information, and establishing a functional grievance mechanism

The Contractors should cooperate with local authorities on the construction plans agreed in the areas near sensitive receptors or in the sensitive times like religious festivals. This should involve timely dissemination of relevant information in a culturally appropriate manner. The Contractor is expected to appoint a Community Communication Officer whose primary role would be active collaboration with the local communities and addressing any grievances that may arise from Project activities. They should have the sufficient resources to respond promptly and accurately to requests from the local community. Bulletin and notice boards should be arranged at all construction sites to provide information on the Project with name and contact information for the appointed Communications Officer so that any affected people can present their concerns and suggestions. The Community Communication Officer will also be responsible for regular coordination, collaboration, and reporting to Srbijavode. For effective communication flow, Serbiavode will appoint a designated counterpart (Stakeholder Engagement and Grievance Manager) to liaise with the Contractor's Community Communication Officer.

A more detailed outline of actions related to stakeholder engagement is presented in the Stakeholder Engagement Plan.

**Table 17 - Impact Assessment Table**

Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
Community Engagement and Communication	Lack of information about planned project activities breaks down the social trust in the project	Local communities	Moderate	Medium	Moderate	<ul style="list-style-type: none"> <li>Srbijavode: <ul style="list-style-type: none"> <li>Overall responsibility for development and implementation of SEP</li> <li>Establish a dedicated community liaison team</li> <li>Implement ESIA public disclosure and consultation activities</li> <li>Establish an external grievance</li> </ul> </li> <li>Contractor: <ul style="list-style-type: none"> <li>Disclosure of information regarding planned construction activities and potential restrictions of access to public or private property and services, and the associated community safety risks (through regular meetings, media, notice boards, public meeting, website)</li> <li>Appoint Community Liaison Officer</li> <li>Use multiple communication channels (public meetings, websites, newsletters, social media) tailored to reach different segments of the community. Translate materials into relevant languages.</li> </ul> </li> </ul>	Negligible
Grievance management	Questions and grievances from the local community not being addressed or mitigated resulting in negative environment	Local communities	Moderate	Medium	Moderate	<ul style="list-style-type: none"> <li>Srbijavode: <ul style="list-style-type: none"> <li>Appoint Stakeholder Engagement and Grievance Manager</li> </ul> </li> </ul>	Negligible



Type of Impact	Impact Description	Receptor	Impact Magnitude	Sensitivity of the Receptor	Impact Significance	Mitigation	Residual Impact Significance
	towards the Project, Srbija Vode and Contractor. Prolonged court procedures for damages					<ul style="list-style-type: none"> <li>○ Establish a dedicated community liaison team, including a specialist responsible for GBVH.</li> <li>○ Establish an external grievance mechanism which interacts smoothly with the Contractor's grievance mechanism</li> <li>• Contractor: <ul style="list-style-type: none"> <li>○ Establish an External Grievance Mechanism and maintain a grievance log.</li> <li>○ Appoint a Grievance Offices (can be same person as Community Communication Officer)</li> <li>○ Advertise the role and contact information and encourage people to reach out</li> <li>○ Establish positive communication with community leaders and representative</li> <li>○ Ensure adequate GBVH handling and response by an appropriately trained staff</li> </ul> </li> </ul>	

**Table 18 – Mitigation and Monitoring**

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
Community Engagement and Communication	Lack of information about planned project activities breaks down the social trust in the project	Local communities	<ul style="list-style-type: none"> <li>• Srbijavode: <ul style="list-style-type: none"> <li>○ Develop and implement SEP, appoint of Stakeholder Engagement and Grievance Manager</li> <li>○ Establish a dedicated community liaison team</li> <li>○ Implement ESIA public disclosure and consultation activities</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Pre-construction, Construction, Operations, Decommissioning</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
			<ul style="list-style-type: none"> <li>○ Establish an external grievance mechanism which interacts smoothly with the Contractor's grievance mechanism</li> <li>• Contractor: <ul style="list-style-type: none"> <li>○ Appoint Community Communications Officer</li> <li>○ Regularly disclose information about Project activities (through media, notice boards, public meeting, website)</li> <li>○ Report on the community engagement activities in the regular Progress reports</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Upon contract award, but no later than the start of construction activities and throughout project implementation</li> <li>• Monthly Reports</li> </ul>
Grievance management	Questions and grievances from the local community not being addressed or mitigated resulting in negative environment towards the Project, Srbija Vode and Contractor. Prolonged court procedures for damages	Local communities	<ul style="list-style-type: none"> <li>• Srbijavode: <ul style="list-style-type: none"> <li>○ Appoint Stakeholder Engagement and Grievance Manager, establish a dedicated community liaison team, including a specialist responsible for GBVH.</li> <li>○ Establish an external grievance mechanism which interacts smoothly with the Contractor's grievance mechanism</li> <li>○ Monitor the implementation of the grievance mechanism; review of the grievance redress activities to be presented in the Contractor's regular progress reports with information on the number of grievances received, outcomes on the closed-put grievances; response times; frequency of communication</li> </ul> </li> <li>• Contractor: <ul style="list-style-type: none"> <li>○ Establish an External Grievance Mechanism and maintain a grievance log.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Upon contract award, but no later than the start of construction activities</li> <li>• Throughout Project implementation</li> <li>• Throughout Project implementation</li> <li>• Monthly reports</li> <li>• Upon contract award, but no later than the start of construction activities</li> </ul>

Type of Impact	Impact Description	Receptor	Mitigation, Management or Monitoring Measure	Timeframe / Frequency / Deadline / Phase
			<ul style="list-style-type: none"> <li>○ Appoint a Community Communications Officer</li> <li>○ Advertise the role of Community Communications officer and their contact information on Project notice boards, in local municipality offices, on the website</li> <li>○ Report on the grievance redress activities in the regular Progress reports</li> </ul>	<ul style="list-style-type: none"> <li>● Throughout Project implementation</li> <li>● Monthly reports</li> </ul>

Stakeholder Engagement Plan has been developed for the Project as a separate document to outline the actions already taken and especially actions still to be implemented to ensure public disclosure of information and meaningful engagement through each stage of the Project delivery in line with EBRD PR 10.

# Appendix A

## Survey Tools

# A.1 Questionnaire for the Survey

## Pambukovica Socio-Economic Survey

### Section 1

#### Identification Number

1. Unique respondent identification number (Interviewer initials and respondent serial number):

Required question. Single-line text.

Enter your answer

2. Does the respondent wish to participate in the survey? Required question. Single choice.

- Yes
- No
- The respondent is unable to participate due to health reasons

### Section 2

#### Basic Socio-Demographic Data of the Respondent

3. Respondent's age: Required question. Single choice.

- 18–25
- 26–35
- 36–45
- 46–55
- 56–65
- 66–75
- Over 75
- Prefers not to answer

4. Respondent's gender: Required question. Single choice.

- Male
- Female
- Prefers not to answer

5. Current residence address (street): Required question. Single-line text.

Enter your answer

6. Respondent's household cadastral municipality: Required question. Single choice.

- KO Gola Glava
- KO Raduša
- KO Pambukovica
- KO Slatina
- Other

7. Respondent's contact (phone or email): Required question. Single-line text.

Enter your answer

8. Respondent's level of education: Required question. Single choice.

- No formal education
- Completed primary school
- Completed vocational secondary school (three years)
- Completed secondary school (four years)
- Completed professional academic studies (Higher school, three years)

- Completed undergraduate academic studies
- Completed master's studies
- Completed doctoral studies
- Prefers not to answer
- Other

9. Respondent's employment status: Required question. Single choice.

- Employed on a fixed-term contract
- Employed on a permanent contract
- Employed under a service contract
- Self-employed
- Informally employed
- Retired
- Student
- Unemployed
- Prefers not to answer
- Farmer
- Other

10. In which sector does the respondent work? Required question. Single choice.

- Public sector
- Private sector – for an employer
- Private sector – self-employed
- Prefers not to answer
- Other

### Section 3

#### Household Data

11. Number of Respondent's household members: Required question. Single choice.

- 1
- 2
- 3
- 4
- 5
- More than 5
- Prefers not to answer
- Other

12. Number of minor children in the Respondent's household: Required question. Single choice.

- 0
- 1
- 2
- 3
- 4
- 5
- More than 5
- Prefers not to answer
- Other



13. Number of permanently employed persons in the Respondent's household: Required question. Single choice.

- 0
- 1
- 2
- 3
- 4
- 5
- More than 5
- Prefers not to answer
- Other

14. Main source of income in the Respondent's household: Required question. Single choice.

- Salaries
- Pensions
- Remittances from abroad
- Social assistance
- Informal earnings
- Agriculture
- Prefers not to answer
- Other

15. Have you stopped engaging in agriculture due to the Project's consequences? Required question. Single choice.

- Yes
- No
- Prefers not to answer

16. How would you rate the current economic situation of the household? Required question. Single choice.

- Excellent
- Above average
- Average
- Below average
- Modest
- Prefers not to answer
- Other

17. Has your economic situation changed in the past four years? /Required question. Single choice.

- Yes
- No
- Prefers not to answer
- Other

18. Has the situation changed for the better or worse? /Required question. Single choice.

- For the better
- For the worse

19. What contributed to the improvement of your household's economic situation? /Required question. Multiple choice.

- Salary increase
- Pension increase
- Employment of previously unemployed members
- Transition of employed members to higher-paying jobs
- Promotions
- Work on the Project
- Assistance from the Project
- Consequences of the Project
- Prefers not to answer
- Other

20. What contributed to the deterioration of your household's economic situation? /Required question. Multiple choice.

- Inflation
- Increase in utility bills
- Job loss
- Increase in rent and similar
- Unexpected increase in household expenses (such as buying medicine due to illness, etc.)
- Consequences of the project
- Loss of business due to the Project
- Loss of income due to the Project
- Job loss due to the Project
- Prefers not to answer
- Increase in fuel prices
- Increase in agricultural production costs
- Low purchase prices of agricultural products
- Other

21. What is the average monthly income of the household: /Likert scale.

22. What are the largest household expenses? /Required question. Multiple choice.

- Utility bills
- Rent
- Household maintenance
- Internet and phones
- Property tax
- Groceries (food and beverages)
- Medicine
- Outings
- Fuel
- Vehicle maintenance and registration
- Medical treatment
- Purchase of textbooks and school supplies
- Children's education
- Purchase of clothing and footwear
- Travel and vacation
- Loan instalments
- Investment in agriculture
- Prefers not to answer
- Other

23. Is the household burdened with a loan repayment obligation? /Required question. Single choice.

- Yes
- No
- Prefers not to answer

24. What is the amount of one loan instalment? /Required question. Single choice.

- 0–5,000 RSD
- 5,000–10,000 RSD
- 10,000–15,000 RSD
- 15,000–20,000 RSD
- 20,000–25,000 RSD
- Over 25,000 RSD
- Prefers not to answer

25. What is the remaining duration of the loan repayment obligation? /Required question. Single choice.

- Less than six months
- Six months to one year
- One to two years
- Two to five years
- More than five years
- Prefers not to answer

26. Did the household have to take out a loan due to the consequences of the Project? /Required question. Single choice.

- Yes
- No
- Prefers not to answer

27. What are those consequences? /Required question. Single-line text.

Enter your answer

28. Does the household use an overdraft? /Required question. Single choice.

- Yes
- No
- Not eligible for overdraft
- Prefer not to answer

29. If using an overdraft, how much is the current overdraft? /Required question. Single choice.

- -10,000
- -20,000
- -30,000
- -40,000
- -50,000
- -60,000
- -70,000
- -80,000
- -90,000
- -100,000
- Prefers not to answer

30. Was the overdraft taken due to any consequences of the Project? /Required question. Single choice.
- Yes
  - No
  - Prefers not to answer
31. What are those consequences? /Required question. Single-line text.  
Enter your answer
32. Does the household own a vehicle that is being used for daily transportation? /Required question. Single choice.
- Yes
  - No
  - Prefers not to answer
33. How old is the vehicle? /Required question. Single choice.
- 1–5 years
  - 5–10 years
  - 10–15 years
  - 15–20 years
  - Over 20 years
34. Does anyone in the household require special medical care? /Required question. Single choice.
- Yes
  - No
  - Prefer not to answer
35. Why is special medical care needed? /Required question. Multiple choice.
- Old age
  - Illness
  - Disability
  - Other
36. Do any of the household members care for individuals living outside the household? /Required question. Single choice.
- Yes
  - No
  - Prefers not to answer
37. Is the household in any way vulnerable, and if so, how? /Required question. Multiple choice.
- Extremely materially vulnerable
  - National minority
  - Predominantly elderly household
  - Lost contact with previous community and are socially and economically isolated
  - Have multiple medically vulnerable or dependent individuals they care for
  - Predominantly female household
  - Not vulnerable
  - Other

## **Section 4**

### **Data on Expropriated Property**

38. How many plots were expropriated from the household members in total? /Required to answer. Single choice.

- 1
- 2
- 3
- 4
- 5
- More than 5
- Prefer not to answer
- Other

39. How long did the household own the expropriated property? /Required to answer. Single choice.

- Less than one year
- One to five years
- Five to ten years
- Ten to twenty years
- Twenty to fifty years
- More than fifty years
- Prefer not to answer
- Other

40. Cadastral Municipality of the expropriated property: /Required to answer. Single choice.

- KO Gola Glava
- KO Raduša
- KO Pambukovica
- KO Slatina
- Prefer not to answer
- Other

41. Total area of the expropriated plot: (1ha = 100a) /Required to answer. Single choice.

- Less than 10 a
- 10–30 a
- 30–50 a
- 50–100 a
- 100–500 a
- 500–1000 a
- 1000–5000 a
- More than 5000 a
- Prefer not to answer
- Other

42. Area of the Respondent's part of the expropriated plot: (1ha = 100a) /Required to answer. Single choice.

- Less than 10 ares
- 10–30 ares
- 30–50 ares
- 50–100 ares
- 100–500 ares
- 500–1000 ares

- 1000–5000 ares
- More than 5000 ares
- Prefer not to answer
- Other

43. Do you have remaining land from the expropriated plots? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer

44. Is the remaining land economically viable? /Required to answer. Single choice. Yes

- No
- Prefer not to answer
- Other

45. Have you submitted a request to purchase the remaining part of the plot? /Required to answer. Single choice.

- Yes
- No, but I plan to
- No and I do not plan to
- Prefer not to answer

46. If you submitted a request, was it accepted? /Required to answer. Single choice.

- Yes
- No
- Still waiting for a response
- Other

47. How long have you been waiting for a response? /Required to answer. Single choice.

- Less than three months
- Three to six months
- Six months to one year
- One to two years
- More than two years
- Prefer not to answer
- Other

48. Are you aware of the legal deadline for submitting the request? /Required to answer. Single choice.

- Yes
- No

49. What was the purpose of the expropriated land? /Required to answer. Single choice.

- Cultivated agricultural land
- Uncultivated agricultural land
- Forest
- Construction land
- Prefer not to answer
- Other

50. Were there any crops on the expropriated land? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer

51. Type of crops on the expropriated land: /Required to answer. Single choice.

- Annual plants
- Fruit
- Vineyard
- Forest

52. How many trees were expropriated? Required to answer. Single choice.

- Up to 10
- 10–20
- 20–30
- 30–40
- 40–50
- More than 50
- I don't know
- Not applicable

53. How many grapevines (roots) were expropriated? /Required to answer. Single choice.

- Less than 10
- 10–20
- 20–30
- 30–50
- 50–100
- More than 100
- I don't know
- Not applicable

54. How many Ares of land with annual plants were expropriated? /Required to answer. Single choice.

- Less than 1 are
- 1–5 ares
- 5–10 ares
- 10–20 ares
- 20–30 ares
- 50–100 ares
- 30–50 ares
- 100–500 ares
- 500–1000 ares
- I don't know
- Not applicable

55. Did you receive compensation for the expropriated crops? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer

56. Was the entry into the plot delayed until you completed the harvest? /Required to answer. Single choice.



- Yes
- No
- We were informed in time, so we did not sow/plant anything
- Other

57. Were you offered replacement land? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer

58. Did you request replacement land? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer

59. Did you receive replacement land? /Required to answer. Single choice.

- Yes
- No
- Other

60. If you did not request replacement land, why? /Required to answer. Single choice.

- No nearby replacement land available
- No replacement land of similar quality
- We no longer engage in agriculture
- We did not know we had the right to replacement land
- Other

61. Did the Respondent engage in any of the following income-generating activities on the expropriated property? /Required to answer. Single choice.

- Hunting
- Fishing
- Beekeeping
- Collecting medicinal herbs
- Collecting mushrooms
- Did not engage in these activities
- Other

62. If you engaged in any of the listed activities, did the Project cause you to stop? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer
- Other

63. Were there any auxiliary structures on the expropriated land? /Required to answer. Single choice..

- Well
- Fence
- Irrigation system
- Tool or storage shed
- Canopy

- There were no auxiliary structures
- Other

64. Did you receive compensation for the expropriated auxiliary structure? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer
- There were no structures
- Other

## Section 5

### Expropriation of Residential Buildings

65. Were there any residential buildings on the expropriated land? /Required to answer. Single choice.

- Yes
- No

66. How many residential buildings were expropriated? /Required to answer. Single choice.

- 1
- 2
- More than 2
- Prefer not to answer
- Other

67. What was the area of the expropriated buildings? /Required to answer. Single choice.

- Less than 40m<sup>2</sup>
- 40–60m<sup>2</sup>
- 60–80m<sup>2</sup>
- 80–100m<sup>2</sup>
- More than 100m<sup>2</sup>
- Prefer not to answer
- Other

68. When was the expropriated building constructed or last renovated? /Required to answer. Single choice.

- Less than 5 years ago
- Between 5 and 10 years ago
- Between 10 and 20 years ago
- Between 20 and 30 years ago
- Between 30 and 40 years ago
- Between 40 and 50 years ago
- More than 50 years ago
- Prefer not to answer
- Other

69. What construction material was used for the building? Required to answer. Single choice.

- Solid
- Other construction materials
- Prefer not to answer

- Other

70. The building was equipped with: /Required to answer. Single choice.

- Kitchen
- Bathroom
- Connection to district heating
- Connection to sewage
- Septic tank
- Connection to municipal water supply
- Hydrophore
- Electricity connection
- Other

71. How did you resolve your housing situation after expropriation? /Required to answer. Single choice.

- Purchased a new residential building
- Built a new residential building
- Moved into a previously owned household building with reconstruction
- Moved into a previously owned household building without reconstruction
- We never lived there, so no relocation occurred

72. Did you receive compensation before or after relocation? /Required to answer. Single choice.

- Before relocation
- After relocation
- There was no relocation

73. Did you face difficulties during relocation? /Required to answer. Single choice.

- Yes
- No

74. Were you able to find accommodation of the same or better quality compared to your previous one with the offered compensation? /Required to answer. Single choice.

- Yes
- No
- Not applicable

## Section 6

### Expropriation of Business Premises

75. Was a business building expropriated as part of the expropriation? /Required to answer. Single choice.

- Yes
- No

76. What was the area of the business building? /Required to answer. Single choice.

- Less than 20m<sup>2</sup>
- 20–40m<sup>2</sup>
- 40–60m<sup>2</sup>
- 60–80m<sup>2</sup>
- 80–100m<sup>2</sup>
- More than 100m<sup>2</sup>
- Prefer not to answer

- Other

77. What material was the business building constructed from? /Required to answer. Single choice.

- Solid
- Other construction material

78. What type of activity was the building used for? /Required to answer. Single choice.

- Trade
- Production
- Craft workshop
- Storage
- Hospitality facility
- Prefer not to answer
- Other

79. How many employees, excluding household members, worked in the building? /Required to answer. Single choice.

- Less than 5
- 5–10
- 10–20
- 20–30
- 30–40
- 40–50
- More than 50
- Other

80. What was the net monthly income? /Single line text.

Enter your answer

81. What was the total monthly turnover? /Single line text.

Enter your answer

82. Did you have to relocate your business due to expropriation? /Required to answer. Single choice.

- Yes
- No

83. Did you face difficulties relocating your business? /Required to answer. Single choice.

- Yes
- No

84. Were you able to find a business facility with the same or better conditions compared to the previous one? /Required to answer. Single choice.

- Yes
- No
- Not applicable

85. What difficulties did you face? /Single line text.

Enter your answer

86. Did you experience business loss due to expropriation? /Single choice.

- Yes

- No

## Section 7

### Compensation

87. Did you receive compensation for everything that was expropriated? /Single choice.

- Yes, we received compensation for everything that was expropriated
- No, we did not receive compensation for everything that was expropriated

88. What did you not receive compensation for? /Single line text.

Enter your answer

89. How satisfied are you with the compensation for the following items? /Likert.

90. How satisfied are you with the compensation for the following items? /Likert.

91. Did you accept the offered compensation? /Required to answer. Single choice.

- Yes
- No
- Prefer not to answer
- Other

92. Did you file a complaint about the offered compensation? /Required to answer. Single choice.

- Yes
- No

93. To whom did you file the complaint? /Required to answer. Single choice.

- Lawyer
- Municipality
- Corridors of Serbia
- Competent ministry
- Other

94. Was a court process initiated? /Required to answer. Single choice.

- Yes
- No
- The process is completed

95. How long did the process last or how long has it been going on so far? /Required to answer. Single choice.

- Less than 6 months
- 6 months to 1 year
- 1 to 2 years
- More than 2 years
- Other

96. How was the process resolved? /Required to answer. Single choice.

- In my favor
- Settlement in my favour
- Settlement in favour of the other party
- In favour of the other party

- The process is not completed
- Other

97. How has the household's economic situation changed due to the compensation? /Required to answer. Single choice.

- The situation improved significantly
- The situation improved somewhat
- The situation remained the same
- The situation worsened somewhat
- The situation worsened significantly

98. How did you spend the money received as compensation? /Required to answer. Multiple choice.

- Purchase of new land
- Investment in agriculture
- Starting a business
- Debt repayment
- Renovation of residential building
- Construction of residential building
- Purchase of residential building
- Purchase of vehicle
- Savings
- Education of children and grandchildren
- For medicine and treatment
- For daily expenses

99. Did you receive any additional assistance from Corridors of Serbia related to the following items? /Required to answer. Likert.

## **Section 8**

### **Awareness**

100. How did you learn about the expropriation process? /Single choice.

- Through neighbours
- Through local newspapers
- Via official municipal letter
- Through radio
- Through television
- Other

101. Have you participated in any type of public consultation related to the dam? /Single choice.

- Yes
- No
- I didn't even know there were consultations
- Prefer not to answer

102. How well were you informed by the authorities about your rights during the expropriation process? /Single choice.

- I was very well informed
- I was fairly well informed
- I'm not sure
- I was poorly informed

- I was badly informed

103. Have you had any problems with the project so far and if so, whom did you contact? /Single choice.

- I had problems and contacted someone
- I had problems but didn't contact anyone
- I didn't have any problems

104. Do you know who you can file a complaint to? /Single choice.

- Yes
- No

105. Whom did you file the complaint to? /Single choice.

- Local government (municipality, local community)
- Corridors of Serbia
- Court
- Contractor
- Lawyer
- Competent Ministry

106. Did the competent authorities respond to your complaint? /Single choice.

- Yes, promptly and the resolution was satisfactory
- Yes, but I waited a long time and it could have been handled better
- They said they would respond, but I'm still waiting
- They said they would not respond
- I never received a response from the responsible parties