



**ЕЛЕКТРОПРИВРЕДА  
СРБИЈЕ**



## **SERBIA – VLASINSKE HPPs REHABILITATION**

### **Stakeholder Engagement Plan**



Date: 01.06.2023

## Abbreviations

EBRD	European Bank for Reconstruction and Development
EPS	Elektroprivreda Srbije
ESDD	Environmental and Social Due Diligence
NTS	Non-Technical Summary
PR	Performance requirement (as defined by EBRD)
SEP	Stakeholder engagement plan
Stakeholder	Stakeholder – individual or organization that can affect, be affected, or consider themselves affected by the Project decision or activity
Submission	Complaint, comment or question regarding the Project and its environmental and social impact. Submission can be related to the EPS employees or contractors hired by EPS organizational units

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## **1. Introduction**

Reconstruction of existing large hydro power plants is one of the priorities for the Republic of Serbia given the importance of increasing the share of renewable energies in power generation. Joint Stock Company Elektroprivreda Srbije Belgrade ("EPS"), the fully state-owned electric power utility in Serbia, is planning the reconstruction of the Vlasinske hydropower scheme (the "Project"), with financial support from the European Bank for Reconstruction and Development (the "EBRD").

The Project was subject to a local environmental impact assessment (EIA) with associated public consultation and public disclosure in accordance with local/national legal and permitting requirements. The Project was also categorised "B" in accordance with the EBRD 2019 Environmental and Social Policy. Consequently, an independent consultant prepared an environmental and social due diligence of the project. An Environmental & Social Action Plan and a Non-Technical Summary were also prepared.

This document is a Stakeholder Engagement Plan and it describes performed and planned activities regarding the stakeholders on this Project. This document also presents a mechanism for submissions (requests, complaints, commendations, etc.) giving the possibility to the individuals, groups and organizations to make a submission to EPS regarding the Project and receive the answer.

Stakeholder Engagement Plan was prepared for the Project during the environmental and social due diligence, in order to ensure compliance of the Project with EBRD's performance requirement 10.

## **2. Project overview**

### **2.1. Description of the project**

Vlasinske hydropower scheme is an existing cascade of four hydropower plants located in the southern part of Serbia (see the figure below), 280 km South-East from Belgrade.



**Figure 1. Vlasinske HPPs location in the Republic of Serbia**

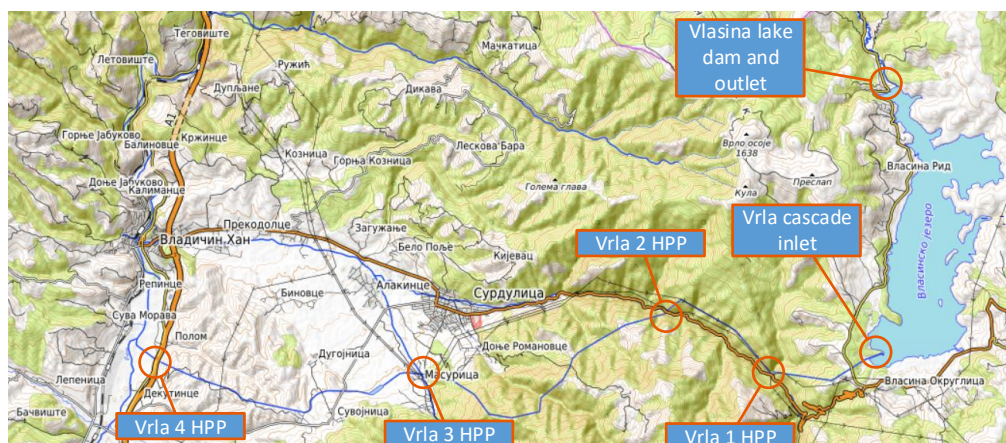
Vlasinske hydropower scheme was initially constructed in two stages. The first stage of construction was carried out in the period 1946 – 1958, while the second stage took place in the period 1972 – 1977. Vlasinske hydropower scheme is fed from Vlasina Lake, the highest (1211 m) and largest artificial lake in Serbia.

Vlasina Lake has a total volume of around 1.65 km<sup>3</sup> out of which 1.05 km<sup>3</sup> can be used for hydropower generation. The cascade consists of 4 hydropower plants called Vrla 1 to 4, with a total capacity of 128 MW.

## 2.2. The proposed rehabilitation project

The Vlasinske hydropower cascade needs rehabilitation. In particular, electromechanical equipment are in poor condition and inefficient. A major disadvantage of these obsolete equipment is their impact on the electric system reliability, since a fault or malfunction on a single generator requires the entire cascade to be partially shut down. As a result, the 128 MW Vlasinske cascade frequently only operates at an effective capacity of 60-80 MW due to malfunctions with the existing equipment.

The Project essentially includes the replacement of units (turbines + generators) at Vrla 1-4 HPPs, as well as the replacement of small equipment.



**Figure 2. Layout of Vlasinske HPPs**

No works are planned on Vlasina dam or at Lisina Pumping Station in the project. The only work that will be undertaken within the Vlasina Lake protected area is the replacement of electromechanical equipment within the intake structure on Vlasina lake shore.

In terms of expected outcomes from the Project, the reconstruction will allow the reliable and safe operation of Vlasinske HPPs for the next 30 years of operation, as well as increasing the installed capacity of the site from 128 MW to 136 MW via increased efficiency.

More significantly, an expected indirect impact of the rehabilitation is to provide major benefits for the development of renewable energy in the country. This is because the rehabilitation of the Vlasinske HPPs will increase the stability of the electricity system, and improve EPS's ability to balance the grid, and allow for the increased penetration of intermittent renewables in the country's generation mix.

The works schedule is such that in each period of rehabilitation half of the production units will be available, while the other half will be under rehabilitation. Considering that, the regimes of exploitation of the Vlasina reservoir as well as the regimes of the rivers that flow into the intermediate reservoirs will remain within the designed and approved limits during the rehabilitation period.

### **2.3. Necessity for Project**

Reconstruction of existing large hydro power plants is an important step towards achieving the goals related to the sustainable development of the Republic of Serbia.

The implementation of the Project will contribute to the improvement of economic activity of region, as it will enable not only the involvement of local companies during reconstruction, but also the development and improvement of local infrastructure.

By reconstruction and investment in the hydro plant that uses renewable energy source in its operation, EPS supports and promotes the sustainable development of the electricity system.

### **2.4. Implementation arrangements and applicable E&S requirements**

The infrastructures to be rehabilitated are owned and operated by EPS who will manage the rehabilitation works and operate the rehabilitated hydropower scheme.

Energoprojekt Hidroinzenjering JSC, an engineering firm with its headquarter in Belgrade, was selected and contracted by EPS to prepare the technical and the regulatory E&S studies required for the Project.

The Project will then be implemented by a Project Implementation Unit (PIU) formed of EPS staff and based within EPS premises. Works will be implemented through a single "design and build" contract. The Project is expected to start in 2024, with first a 15 months preparation period (engineering, tendering and manufacturing) followed by a 3-year rehabilitation works period.

## **3. Purpose of the Stakeholder Engagement Plan**

EPS is implementing the Project according to the 2019 Environmental and Social Policy of the European Bank for Reconstruction and Development (EBRD). The Project was subject to an Environmental and Social (E&S) due diligence, and was categorised "B" by EBRD,

meaning that the project is not expected to have large scale or long lasting adverse E&S impacts.

This Stakeholder Engagement Plan (SEP) has been produced as a result of the due diligence process. It presents the planned stakeholder engagement activities for the project and outlines a systematic approach aimed at developing and maintaining transparent relationships with stakeholders throughout the project lifetime.

The engagement process is a continuous dialogue carried out on an on-going basis throughout the project cycles. It enables the incorporation of all relevant views of stakeholders into decision-making and Project implementation.

The SEP includes a grievance mechanism so that stakeholders can raise any concern, provide feedback and comments about the project.

The SEP is a living document, and is meant to be updated and developed further as the project progress, particularly before the project enter the operation phase.

## **4. Requirements regarding Stakeholder Engagement**

EPS applies principles of good international practice, obligations defined by national regulations, requirements from EBRD Environmental and Social Policy referring to data publishing and stakeholder engagement. In the above context, EPS has prepared and applies in practice Stakeholder Engagement Plan at corporate level published on the website of EPS (link: [Corporate SEP](#)) Stakeholder Engagement Plan at corporate level represents a framework document based on which stakeholder engagement plans for individual projects are being prepared.

### **4.1. EBRD Requirements**

The Project is required to meet best international practice and specifically the requirements for stakeholder engagement and public consultations, as specified in the EBRD Environmental and Social Policy of 2019.

These requirements are described in detail in Policy Requirement (PR) 10 of the Policy "Information Disclosure and Stakeholder Engagement". The EBRD policy considers Stakeholder engagement an ongoing process which involves: x the client's public disclosure of appropriate information so as to enable meaningful consultation with stakeholders x meaningful consultation with potentially affected parties, and x a procedure or policy by which people can make comments or complaints.

### **4.2. PE EPS internal policies and procedures**

EPS identifies, monitors and reviews external and internal issues which are relevant to its business and strategic direction and affect the ability of the company to achieve the planned results of the established Integrated Management System (IMS). In September 2020, EPS has adopted a Procedure for Identification, Analyses and Consideration of the Needs and Expectations of Stakeholders and the Guidelines for Stakeholder Engagement via Submissions (the "Engagement Internal Documents"), which is being implemented in all organisational units of the EPS. These Internal documents define ways of communication and types of cooperation with stakeholders and their timely notification on key elements of significant projects of the EPS and all activities in the field of quality of products and services, environmental protection and health and safety at work.



HPP Djerdap have their own SEP, aligned with the Corporate SEP, with the purpose of addressing in more detail stakeholder engagement relevant to their activities and projects (link: [HPP Djerdap SEP](#)).

## 5. Stakeholder engagement activities carried out to date

An Environmental Impact Assessment was prepared as per the Law of the Republic of Serbia for the Project:

- An official notification was issued by EPS, based on which the need for an EIA was confirmed.
- A scoping EIA was prepared and subject to a scoping publication through the website of the Ministry in charge of environment.
- The EIA was finalized and submitted in early May 2023 to the competent authority. The EIA is under review as the present SEP is being written.
- A 2-month review period is then expected for the EIA as per the legislation requirements, and then Approval of the EIA is expected.

During this review process, the ministry forms a commission with experts that they choose (depending on the nature of the project), and the EIA will be provided in hard copy and electronically for review by these experts and the public (30-day disclosure period). Public meetings will be organized in the Project area. The ministry will collect comments and questions, and EPS will have to answer them and finalize the EIA accordingly (through the consultant who prepared the EIA). EPS has an obligation to answer all questions and integrate all requirements from the Ministry or from the experts before Approval can be obtained. The EIA will then remain available on the Ministry's website for interested stakeholders in future

### 5.1. Engagement activities during the E&S due diligence

The ESDD was conducted in May 2023, with two days spent on site. Meetings and discussions with various stakeholders were held: Belgrade-based EPS staff, local staff members (including both EPS permanent staff and service providers' staff), local stakeholders, the Touristic Organization of Surdulica Municipality (TOSM) who manages the Vlasina Lake and Vardenik protected areas.

Meetings were also held in Belgrade, with the Institute for Nature Protection (this is the entity that supervises the management of protected areas).

### 5.2. Project disclosure

Information regarding the Project was shared with the public in different forms, the main ones being:

- **Informal discussions about the Vlasinske rehabilitation project by various stakeholders:** the project to rehabilitate Vlasinske hydropower scheme has been discussed transparently for approximately 15 years. People who live in the Project area (Surdulica municipality and its surroundings) are likely to have heard about the Project, because Vlasinske hydropower scheme is the main source of employments

in the area. Professionals of the hydropower/energy sector in Serbia are also likely to have heard about the Project.

- **Formal consultation process:** during the EIA scoping phase of the project (resp. during the EIA phase) public consultation was (resp. will be) formally organized with public announcements, on-line consultation as well as physical meetings.

Further communication with stakeholders will include meetings and media promotion, as applicable. EPS will keep records of all realised contacts with stakeholders, and particularly part referring to objections and complaints of stakeholders.

Stakeholders have available access to the following information:

- Project basic information;
- Duration of the Project planned activities;
- Relevant documents of interest for stakeholders;
- Recognized and potential risks and Project influences to the local community;
- Time and venue of scheduled meetings and consultations with stakeholders;
- Manners in which stakeholders may participate in different phases of the Project;
- Map of the territory covered by the project, map of transport and information on restrictions/changes that may arise in regular transport system on the territory of windfarm;
- Manner of petition submission and getting answers to them.

The detailed plan of informing the public about the project activities during construction and operation phases with timings and methods will be prepared.

## 6. Stakeholder identification and analysis

The following table provides an overview of the project stakeholders, and of the type of stakeholder engagement actions that should be put in place and maintained with these stakeholders, essentially during the construction period.

Stakeholder (group)	Relation to/ interest in the project
<b>Potentially affected parties</b>	
Towns and villages in the vicinity of the project	<ul style="list-style-type: none"> <li>• Affected by the disturbances (increased traffic and workers presence, , noise ...) generated by the Project activities.</li> <li>• May seek employment opportunities</li> <li>• Interested in Project details and progress.</li> </ul>
Users of water from Masuricka Canal and Lake for irrigation	<ul style="list-style-type: none"> <li>• Interested in continued water availability during the irrigation season</li> </ul>
Users of water from Masuricka Canal and Lake for recreational swimming	<ul style="list-style-type: none"> <li>• Interested in continued water availability during the irrigation season</li> <li>• Require more information on drowning risks</li> </ul>
All stakeholders that happen to come close to artificial channels that form part of the Lisina-Vlasina complex: tourists, hikers, neighbouring population (especially children), fishermen, farmers...	<ul style="list-style-type: none"> <li>• Require more information on accident/drowning risks triggered by rapid flow variations</li> </ul>
<b>Municipal and local governing bodies</b>	



Stakeholder (group)	Relation to/ interest in the project
Representatives of the local administration, from the municipality and district levels	Need to be informed about the Project (general timeline and organization) Can participate in social problem solving Can convey the concerns and expectations of the community
<b>Governmental authorities and State companies</b>	
Police, first aid services	<ul style="list-style-type: none"> <li>Traffic regulation, especially in case of heavy-transport convoy</li> <li>Access to the site in case of incident or emergency</li> </ul>
Firemen, first aid services	<ul style="list-style-type: none"> <li>Access to the site in case of Emergency</li> </ul>
<b>Other stakeholders</b>	
Touristic Organization of Surdulica Municipality (TOSM)	<ul style="list-style-type: none"> <li>Monitoring Vlasina Lake and Vardenik protected areas.</li> <li>Short and long term possible impacts of Vlasinske hydropower scheme operation on these protected areas.</li> <li>Trends of hydrometeorological parameters monitored by EPS on site.</li> </ul>
CSOs, scientists	<ul style="list-style-type: none"> <li>Possible interest in the Project.</li> <li>Project to keep open communication with CSOs and scientists.</li> </ul>
Business at the local and regional level	Providers of construction materials, catering services, utility services: waste removal, electricity, gas, water supply, transport of workers, accommodation facilities for visitors etc.
Mass media: Internet-portal; TV and new papers, etc.	Interest in providing project updates and information about the Project.
Jobseekers / Employment agencies	Employment opportunities
<b>Internal stakeholders</b>	
Workers	Interest in working conditions and grievance mechanism, compliance with health, safety and conduct procedures

## 7. Stakeholder engagement activities

### 7.1. Organisation

As required by EBRD, an Environmental and Social Action Plan (ESAP) was prepared for the Project. The implementation of the ESAP is a mandatory requirement for EPS, as part of the financing agreement with EBRD.

The ESAP includes the obligation for EPS to (i) implement the SEP, and (ii) to designate a staff, the "ESAP Owner" who will be responsible for organizing and delivering the implementation of the SEP. He/she will regularly revise and update this SEP.

The ESAP Owner will:

- Provide information to stakeholders as required by the SEP;
- Identify points of contact in the most relevant regional and national medias;
- Ensure that all incoming communications (via email, telephone or in person) are responded;
- Keep regular contact with key stakeholder;
- Collect feedback in order to continuously improve the SEP;
- Participate in disputes resolution;
- Assess annually the effectiveness of the SEP, and update it when deemed necessary.

## **7.2. Stakeholder engagement programme**

The following table provides a stakeholder engagement programme consistent with the stakeholder identification and analysis presented in chapter 6.

**Table 1 - Project stakeholders and information disclosure and communication methods**

Stakeholder	Subject	How/Communication method	When
<b>Stakeholders within the Project</b>			
All stakeholders, national and regional level	General information about the Project, and company's contact for more information	SEP and NTS disclosed on the webpage(s)	Before project construction starts
EBRD	All matters being of interest for financial cooperation	Official correspondence and meetings Project Progress Reports Grievance procedure Code of conduct	During complete Project execution
Suppliers of works, goods and services	Information on project procurement schedule Information on obligation to meet EBRD performance requirements	Through the webpage Through bidding documents and contract terms	Before construction starts During tender process
EPS Management	All matters, particularly those being of interest for the Project sustainability Identified risks Reports upon EPS Management request	Regular reporting on the Project progress, impacts and taken measures Meetings	During complete Project execution
EPS Employees	Information upon request Project Status	Internal communication means Notice board Code of conduct	During complete Project execution
<b>Stakeholders outside of the Project</b>			

Stakeholder	Subject	How/Communication method	When
Relevant republic and provincial authorities: <ul style="list-style-type: none"> <li>Ministry of mining and energy</li> <li>Ministry of environmental protection</li> <li>Ministry of agriculture, forestry and water management</li> <li>Ministry of internal affairs</li> <li>Ministry of construction, transport and infrastructure</li> <li>Ministry of finance</li> <li>Ministry of defense</li> <li>others</li> </ul>	Permits Approvals Information upon request	Official correspondence and meetings Procedures for obtaining permits	During preparation, construction and complete Project execution
Regional mass media	All matters	Placement of press releases and information, articles and PR texts for media, the press conferences organization, recording of articles and interviews.	During complete Project execution
Touristic Organization of Surdulica Municipality (TOSM)	Information about the Project construction and operation Environmental information and data sharing. Prevention of risks for biodiversity	Meetings between the ESAP Owner and TOSM	Every 6 months.
Users of water from Masuricka Canal and Lake for irrigation	Early information in case a disruption of water availability is planned during the irrigation season. Indication of the duration of the disruption.	Through local population representatives	Before any water availability disruption
Stakeholder exposed to rapid flow variations, as identified when preparing the public safety plan around all waterbodies (ESAP action 4.5)	Signage, awareness raising and all other information disclosure as required by the public safety plan around waterbodies	As defined by the plan	As defined by the plan
Local authorities	Information on the project key steps.	Quarterly brief during rehabilitation	During the rehabilitation period

Stakeholder	Subject	How/Communication method	When
Representatives of Local Communities	General information on the Project (commencement and completion of works) Transportation directions Instruments for appeals/petitions	Official correspondence and meetings Notices on public notice boards Local public media	During complete Project execution
Nearby road users	Planned traffic disturbances or congestions	Signage	2 to 5 days before disturbance
Road police		Traffic marshals Formal correspondence + phone call	2 to 5 days before disturbance
	Accidents, incidents or issues that require police action	Phone call	When deemed necessary
Job seekers	Information about vacancies.  Information that positions are open to both men and women	Official job announcement tools agreed with contractor and the population representatives	During complete Project execution

### 7.3. Internal monitoring and reporting

The ESAP Owner will organize and monitor the effective implementation of the SEP and will provide annual reporting to EBRD during the construction phase.

Annual reporting will include:

- Description of stakeholder engagement actions undertaken during the reporting period, with reference to the SEP;
- Statistics for the reporting period:
  - Number of visits to the Project webpage.
  - Number of queries received by phone, email or directly at the company premises.
  - Main topics of queries
  - Number of complaints.
  - Main topics of grievances

Stakeholder engagement activities will be recorded in a log, in order to allow traceability and statistics. The following table provides an example of format for this log.

#	Name / address	Question /Grievance	Answer media	Answer provided	Status	Is the stakeholder satisfied
2024.10.22.01 (stand for first question on October 22nd 2024)			(letter, phone call...)		reply date, closed etc.	yes, no, unknown

### 7.4. Grievance mechanism

For the purpose of improvement of dialogue with stakeholders, EPS has established:

- Procedure for identification, evaluation and reconsideration of external and internal issues and understanding of needs and expectations of stakeholders;
- Instructions for Cooperation with Stakeholders through EPS grievance mechanism.

Submission may be an objection, appeal, praise, comment or question related to the Project and its effect. The Submission may also refer to EPS employees or contractors and their activities.

Management of submissions evidenced with contractor and subcontractor for the purpose of implementation of the Project, will be done in accordance with submission management system established by EPS, and EPS follows their outcome.

Futhermore is descibed the grievance mechanism that will be implemented and managed by contractors and subcontractors.

The Contractors shall implement an independent grievance management system to enable the workers to raise reasonable workplace concerns. This includes complaints related to non-compliance with health and safety matters, discrimination cases and non-consideration of equal opportunities.

The workers grievance mechanism shall follow the same principles as the one created for the general public: complaints must be answered in a timely and effective manner without fear of retribution; the access to the grievance mechanism shall not replace or impede the subsequent access to other redress mechanisms; the Contractors will inform workers of the grievance mechanism at the time of hiring and make it accessible to them.

The grievance management system shall consider the possibility to contact directly a member of the site management staff. The contacted staff members must take a note of the reported complaint or non-compliance and must report it to the site manager.

The site manager shall timely solve the complaint or non-compliance. In case the problem cannot be solved, an action procedure specifying the needed activities together with a predicted deadline for resolution of the problem must be prepared and submitted to the general manager.

If the response to the grievance cannot be provided within 30 days, the site manager notifies the involved party who submitted the grievance within 15 days from the date of the grievance submission, and sets a new deadline not exceeding 40 days.

Each involved party is entitled to receiving the outcome of the solution of its grievance, i.e. about options for its resolving or related actions.

The Contractors shall provide the possibility for the workers to notify a complaint or non-compliance in a confidential way.

The grievance system will allow staff and sub-contractors to provide feedback on any element of the work via email or by hand delivery to a box placed on site, except for the anonymous grievances. Grievances will be logged into a spreadsheet where they will be then delegated to the appropriate person for close out. Grievances will be confidential, and staff and contractors will be in no way penalized for providing their feedback.

The Contractors will be obliged to develop and monthly submit to EPS, a grievance log containing the following information:

- Submission date
- Entity/Individual person's name
- Contact details
- Comment / Complaint / Concern
- Answer and Action for follow-up
- Responsibility
- Deadline
- Confirmation of close-out
- Date of close-out.

## **7.5.Submission of Grievances**

EPS will consider all received submissions. As far as anonymous submissions are concerned, EPS has limited capacity of replying in adequate manner.

Grievance may be submitted in free form or in the Submission Form, available for downloading from EPS web site, than Submission Form from this document, as well as at EPS registry offices.

Submissions may be delivered:

- directly to ESAP Owner, or by e-mail, as stated at the end of this document.
- Personally, to the registry office at business premises of EPS HQ and registry office of HPP Djerdap Branch. Submissions arrived in this manner may be on the official Form in the annex of the present document or in the free form



Phone and verbal communication with stakeholders will be done solely for educational purposes of the submitting party in the grievance mechanism, rather than for evidencing the verbal submissions.

Submission of a grievance does not prevent a stakeholder to appeal to competent authorities or courts, in accordance with valid legislation of the Republic of Serbia.

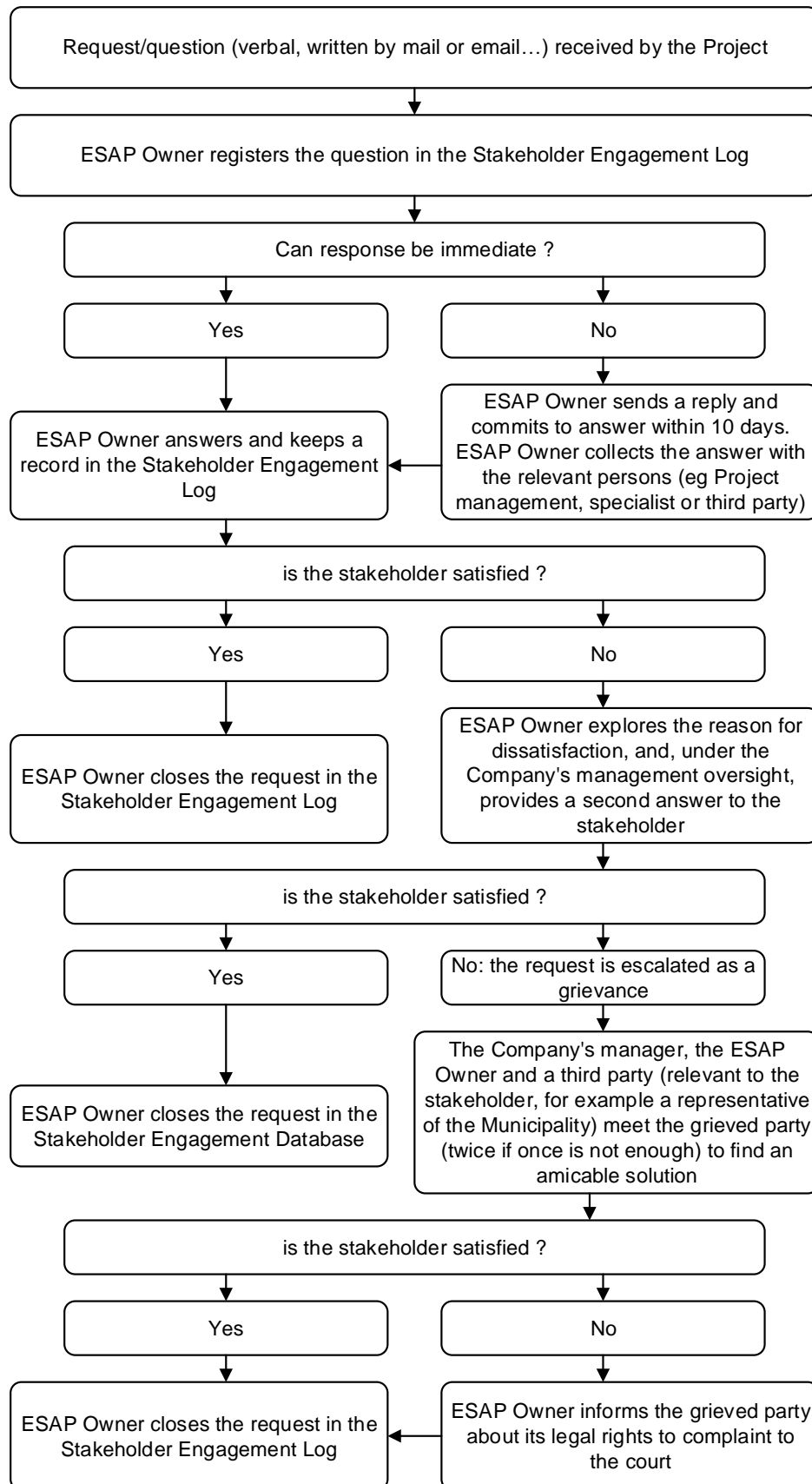
## **7.6. Grievance Management**

Submissions will be recorded into the system of electronic registry office on the same date of their receipt. Reply will be prepared within 30 business days of the date of receipt. In case of submissions for which it is found that additional research is needed or that their solving requires passing decision on the top level management of EPS, the submitting party will be informed that EPS needs some time to consider the subject grievance, and upon the completion of the problem research procedure, it informs the stakeholder on solution for the grievance.

Submissions arrived in electronic registry office of the HQ or Branch HPP Djerdap are to be registered into adequate class and sub-class and forwarded to the Division for Cooperation with Stakeholders for further treatment. The Division prepares a reply, who will prepare a reply in cooperation with Expert Team monitoring implementation of the project and sends the reply to the stakeholder.

Submissions in form of the letter or those received through e-mail to the address of EPS Director's Office and Branch HPP Djerdap Director's Office, are being forwarded to Division for Cooperation with Stakeholders which proceeds in compliance with established grievance management system. The submissions arrived in other organizational units of EPS are treated in the same manner.

**Figure 1 - Grievance mechanism**



GRIEVANCE FORM	
Reference No:	
Full Name Note: <i>you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent</i>	My first name _____ My last name _____ <input type="checkbox"/> I wish to raise my grievance anonymously <input type="checkbox"/> I request not to disclose my identity without my consent
Contact Information  Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ _____ By Telephone: _____ By E-mail: _____
Preferred Language for communication	Serbian English
Description of Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident/Grievance	
	One-time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature:

Date:

Please return this form to the ESAP Owner Tanja Kovačević, [tanja.kovacevic@eps.rs](mailto:tanja.kovacevic@eps.rs), Carice Milice 2, 11000 Belgrade; Milena Đakonović, [milena.djakonovic@eps.rs](mailto:milena.djakonovic@eps.rs), Carice Milice 2, 11000 Belgrade]