

CITY OF BELGRADE

CITY ADMINISTRATION – SECRETARIAT FOR ENVIRONMENTAL PROTECTION

PPP PROJECT FOR THE CITY OF BELGRADE FOR THE PROVISION OF SERVICES OF
TREATMENT AND DISPOSAL OF RESIDUAL MUNICIPAL SOLID WASTE

STAKEHOLDER ENGAGEMENT PLAN

October 2018

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ABBREVIATIONS

BCE – Beo Čista Energija d.o.o.

CoB – City of Belgrade

EBRD – European Bank for Reconstruction and Development

EIA – Environmental Impact Assessment

EPS – Elektroprivreda Srbije (Electric utility power company of Serbia)

ESAP – Environmental and Social Action Plan

ESIA – Environmental and Social Impact Assessment

ESMP – Environmental and Social Management Plan

HR – Human Resources

IFC – International Finance Corporation

KPI – Key Performance Indicator

MSW – Municipal Solid Waste

NES – National Employment Service

NGO – Non-governmental Organisations

PECS – Public Enterprise City Sanitation

PPP – Public Private Partnership

PR – Performance Requirement

PS – Performance Standard

RAP – Resettlement Action Plan

SE – Stakeholder Engagement

SEP – Stakeholder Engagement Plan

SPV – Special Purpose Vehicle

TBD – To be determined

1 Introduction

The City of Belgrade (CoB), represented by the City Secretariat for Environmental Protection, has decided to procure residual municipal solid waste (MSW) treatment and disposal services through a long-term Public-Private Partnership (the PPP) contract.

These services comprise the design, financing, construction, operation and maintenance of treatment and disposal facilities for about 510,000 tonnes per year of residual municipal solid waste and over 200,000 of construction and demolition waste.

Whereas, 340,000 tonnes of MSW will be incinerated in Energy from Waste plant producing electrical and thermal energy, 170,000 tons of MSW will be treated and disposed on new sanitary Landfill that would be built as part of the Project, over 100,000 tonnes per year of construction and demolition waste will be treated in Construction and Demolition Waste plant, Leachate waters would be collected and treated in Leachate Water Treatment Reverse Osmosis Plant and landfill gas will be collected and utilized for the production of electrical and thermal energy in Bio Energy Plant. Existing landfill – unsanitary dumpsite, Vinča landfill, would be rehabilitated and closed. (the Project).

A Special Purpose Vehicle (SPV), Beo Čista Energija d.o.o. Ltd., (BCE) was formed in September 2017, to manage the Project.

The Project will be financed by loans from International Financial Institutions (IFIs) and is being developed to comply both with national legislation of the Republic of Serbia and environmental and social IFI requirements, particularly those of the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD).

An Environmental and Social Impact Assessment (ESIA) with associated management plans and other supporting documents has been developed and is available for comments from 12th October 2018 until 12th December 2018. (see section 7.1 of this SEP). Supporting documents include a Resettlement Action Plan (RAP), as the Project will cause physical and economic displacement and this Stakeholder Engagement Plan (SEP).

The SEP has been developed and will be implemented to meet IFI requirements for stakeholder engagement and public consultation and disclosure for the Project. It describes the grievance mechanism for people to raise any concerns about the Project.

2 Project Description

The CoB is initiating a modernization plan to transform its MSW management practices and remediate the MSW disposal facilities located at the existing site in Vinča. As part of the plan, the City wants to develop a comprehensive modern mixed residual MSW treatment complex generating energy from the waste produced on its territory. It also wants to develop a Construction and Demolition (C&D) waste treatment facility, a new sanitary landfill for treatment residues, and undertake the rehabilitation with landfill gas collection from the existing landfill site and its utilization for production of electrical and thermal energy in Vinča. In addition, a 110 kV overhead line (OHL) of approx. 5 km will be constructed to connect the new Vinča landfill substation with EMS Substation Beograd 20. Power supply to the site for self-consumption is foreseen from distribution network via a new 35/10 kV substation that shall be constructed within Vinča site. This substation shall be connected to the existing substation 35/10 kV Vinča via single circuit 35 kV line of approximately 5km in length. Heating energy produced in Waste to Energy Plant will be supplied to Belgrade District Heating company, PUC Beogradske Elektrane, by district heating pipeline of approx. 8 km, mostly underground, that will connect Vinča landfill site with the “Konjarnik” district heating plant. Full details about these associated facilities are not yet available, however, once known, they will be presented to the public.

The objective of the City is to treat maximum volumes of biodegradable MSW and restrict as far as possible the use of the landfill for disposal of treated residues and inert waste, thus contributing to Serbia meeting the requirements of the EU Landfill Directive 1999/31/EC on reducing biodegradable MSW going to landfills.

The Project is of national and local priority due to the following:

- It will contribute to Serbia meeting targets in waste management and environmental protection in the context of EU accession negotiations;
- It is a large-scale waste treatment project in the region, demonstrating Serbia's attractiveness as a destination for large foreign investments in the sector and it will demonstrate the bankability of the Serbian PPP framework, paving the way for future PPP projects in the country;
- It will contribute to demonstrating that Belgrade, and Serbia as a whole, are at the forefront of best practices in environmental and social protection in the region, with modern waste treatment infrastructure facilities, maximizing its recycling and recovery rates from waste;
- The existing space available for land filling at Vinča is running out; left untreated, the existing landfill body may become a threat to neighbouring communities, biodiversity and ground waters. The City must increase the landfill diversion rate as soon as possible and must rehabilitate the existing landfill body;
- The electricity, and the heat, generated by the Project facilities will contribute to the scaling up of sustainable energy solutions for Belgrade.

The existing Vinča landfill is in the east part of the City of Belgrade, in the settlement Vinča on the right bank of the river Danube. It is accessed by a road, off the Smederevo Road. The location is surrounded by several settlements (Veliko selo, Slanci, Mirijevo and Vinča), all sufficiently far from the landfill, with the closest houses 1.1 km away (group of houses in the settlement Veliko selo). Upon expansion of the existing landfill, the closest (isolated) house will be 800 m to the north-east of the perimeter of the extension area.

The landfill is currently being operated by the Public Enterprise City Sanitation (PECS). Land is being acquired around the existing landfill, for expanding the total territory of the landfill, where Project components will be constructed. Once construction is finalised, the old landfill will be rehabilitated and management of the whole complex will be under the remit of the SPV BCE.

Figure 1 Location of the Project and surrounding settlements



Source: Google Earth (July 2018)

The Project requires the physical resettlement of an informal settlement at the Vinča landfill, consisting of 17 households, who are currently living within the complex within the boundaries of the Regulation Plan. Nine of the households have registered residence in the City of Belgrade and their resettlement will be managed by the City Secretariat for Social Welfare. The remaining eight households have registered residence either in the City of Šabac or Vladimirci municipality and their resettlement will be managed by the relevant municipal administration departments and services. When Project construction is completed, and the old landfill is closed, further waste picking and waste sorting activities, currently being carried out, will no longer be permitted. This is expected to happen in December 2019 and will have an impact on the people and companies currently engaged in these activities. This includes approx. 270 individuals engaged in waste picking and 7 private companies and LAFARGE BFC, engaged in the collection and purchase of secondary raw materials, operating at the landfill. These impacts have been addressed by the development of a Project RAP, in which more details are available.

Environmental and social impacts associated with the Project, as well as the proposed mitigation and enhancement measures, are described in more detail in the Environmental and Social Impact Assessment, which has been disclosed to the public as described in Section 7 of this SEP.

3 The Objective and Purpose of the SEP

IFIs consider stakeholder engagement to be an on-going process, which involves:

- Public disclosure of appropriate information to enable meaningful consultation with stakeholders;
- Meaningful consultation with potentially affected and interested parties; and
- A policy and procedure by which people can make comments or complaints to be considered in the decision-making process, where possible.

The main objective of the SEP is to increase the effectiveness and relationships with all Project stakeholders. The SEP presents the general principles, as well as mechanisms and tools which are to be used for engaging the stakeholders throughout the Project lifecycle.

The purpose of the SEP is to:

- Provide an overview of how the CoB has previously communicated with people who are affected by or are interested in the Project
- Provide a strategic and systematic approach to future interactions with stakeholders at local and national levels, with focus on Project affected parties, with the aim of fostering a transparent two-way dialogue seeking understanding and solutions to issues of mutual concern;
- Present the consultation, disclosure and stakeholder engagement activities that will be carried out in the area of influence of the project.

This SEP is a living document. Its overall strategy and approach, and the general commitments will not change, but the practical implementation will be modified according to the Project life cycle, the ongoing consultations with stakeholders and any relevant issues and lessons learned during the Project life cycle.

This document will be disclosed as well as any subsequent updates, to affected stakeholders and other interested parties. The SEP will be disclosed in English and Serbian language.

4 Regulatory Requirements

4.1 National Legislative and Regulatory Framework

Key legislation of the Republic of Serbia, addressing stakeholder engagement, that pertains to the Project includes:

- The Constitution of the Republic of Serbia¹ provides a wide platform for public participation and access to information. It also provides the public with the right to submit requests, petitions and proposals. Article 74 states that everyone has the right to a healthy environment and to timely and complete information about the state of the environment.
- The Law on Free Access to Information of Public Importance² regulates citizens' rights in relation to access to information, held, used and managed by public institutions, sets out the principles and exceptions in the achievement of these rights, as well as the procedures for accessing this information and their protection.
- The Law on the Protector of Citizens³ establishes an independent state authority which protects the human and minority rights and freedoms of citizens (domestic and foreign physical and legal entities) and controls the work of all administrative authorities.
- The Law on Waste Management⁴ prescribes that the issuing of permits for waste management is made public, i.e. that any submitted request for waste management and accompanying documentation, are publicly disclosed and available for comments.

Disclosure of information and organising public hearings in Serbian legislation is regulated through the process of development and adoption of spatial and urban plans for cities, municipalities, settlements, as well as through the environmental impact assessment process.

The laws which regulate these matters are:

- Planning and Construction Law⁵
- Law on the Confirmation of the (Aarhus) Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters⁶. The basic principles of this Convention are also supported by other laws and bylaws of the Republic of Serbia, including the Environmental Protection Law⁷, Environmental Impact Assessment Law⁸, Strategic Environmental Impact Assessment Law⁹ as well as the Regulation on the Procedure for Public Disclosure, Presentation and Public Hearing for the Environmental Impact Assessment¹⁰.

The main activities which must be undertaken before the adoption of the plan / study / document include:

- Through media, inform the public about the details of disclosure of the draft plan/study/document (e.g. where hard copies are available and the dates and times when they can be reviewed) and invite citizens / organisations to submit comments and/or participate in public hearings. Citizens and organisations can request that their comments are responded to in writing;

¹ Official Gazette of the RS 98/06

² Official Gazette of the RS 120/04, 54/07, 104/09 and 36/10

³ Official Gazette of the RS 79/05 and 54/07

⁴ Official Gazette of the RS 36/09, 88/10 and 14/16

⁵ Official Gazette of the RS 72/09, 81/09, 64/10 – Constitutional Court Decision (CCD), 24/11, 121/12, 42/13 – CCD, 50/13 – CCD, 54/13 – Constitutional Court Rescript, 98/13 – CCD, 132/14, 145/14

⁶ Official Gazette of the RS 38/09

⁷ Official Gazette of the RS 135/2004 and 36/2009

⁸ Official Gazette of the RS 135/04 and 36/09

⁹ Official Gazette of the RS 135/2004 and 88/2010

¹⁰ Official Gazette of the RS 69/05

- Organisation of a public hearing to present and discuss the draft plan/study/document (usually held in the local administration building or some other suitable venue);
- Process comments received from all interested stakeholders and revise/complement the draft plan/study/document accordingly, as well as prepare a report on which comments were not considered and why;
- Deliver the revised plan/study/document and report to the responsible authority which determines whether all comments were adequately considered and processed.

Stakeholder engagement activities on matters concerning the application of expropriation, from the proclamation of public interest to the payment of compensation, are regulated by the Expropriation Law¹¹.

4.2 IFI Requirements

Apart from national legal requirements described in the previous section, the Project is also expected to meet IFI stakeholder engagement requirements in relation to disclosure of information, consultations and grievance management presented in IFC's Performance Standard 1 (Assessment and Management of Environmental and Social Risks and Impacts) and EBRD's Performance Requirement 10 (Information Disclosure and Stakeholder Engagement).

These requirements can be summarised as follows:

- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure that relevant environmental and social information is disclosed and disseminated.
- Develop and implement a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stage and is tailored to the characteristics and interests of the affected communities. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable¹².
- Effective consultation is a two-way process that should:
 - (i) begin early in the process of identification of environmental and social risks and impacts and continue on an ongoing basis as risks and impacts arise;
 - (ii) be based on the prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information which is in a culturally appropriate local language(s) and format and is understandable to Affected Communities;
 - (iii) focus inclusive engagement on those directly affected as opposed to those not directly affected;
 - (iv) be free of external manipulation, interference, coercion, or intimidation;
 - (v) enable meaningful participation, where applicable; and
 - (vi) be documented.

¹¹ Official Gazette of the RS 53/95, Official Gazette of the FRY 16/2001 – Federal Constitutional Court Decision and Official Gazette of the RS 20/2009, 55/2013 – CCD 106/2016 – authentic interpretation

¹² Vulnerable groups refer to people who, by virtue of gender identity, sexual orientation, religion, ethnicity, indigenous status, age, disability, economic disadvantage or social status may be more adversely affected by project impacts than others and who may be limited in their ability to claim or take advantage of project benefits. Vulnerable individuals and/or groups may also include, but not be limited to, people living below the poverty line, the landless, the elderly, women and children-headed households, refugees, internally displaced people, ethnic minorities, natural resource dependent communities or other displaced persons who may not be protected through national legislation and/or international law (*EBRD 2014 E&S Policy, footnote 8*).

- The consultation process should:
 - (i) capture both men’s and women’s views, if necessary through separate forums or engagements, and
 - (ii) reflect men’s and women’s different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.
- Where there are affected communities, the client will establish a grievance mechanism to receive and facilitate resolution of affected communities’ concerns and grievances about the client’s environmental and social performance. The grievance mechanism should be scaled to the risks and adverse impacts of the project. It should seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies. The client will inform the affected communities about the mechanism during the stakeholder engagement process.

Specific engagement requirements apply in cases of physical and/or economic displacement, as described in IFC’s Performance Standard 5 (Land Acquisition and Involuntary Resettlement) and EBRD’s Performance Requirement 5 (Land Acquisition, Involuntary Resettlement and Economic Displacement).

The above list is only a summary of the main IFI requirements and is qualified by reference to the full text of the applicable policies¹³.

4.3 Key Differences Between National and IFI Requirements

Serbian requirements are to a large extent compatible with IFI requirements, however several gaps exist, as follows:

- IFIs require the development of a Stakeholder Engagement Plan, to guide the disclosure of Project documents and consultations with affected people and other stakeholders;
- IFIs require a very proactive approach in obtaining the public opinion and identifying and engaging with all stakeholders, as opposed to a reactive approach, i.e. responding only to comments/questions submitted and issues raised, after they have been submitted/raised;
- Attention is required by IFIs in identifying and engaging with vulnerable groups;
- Dedicated consultations with people affected by land acquisition (including land users) are required by IFIs, before and during land acquisition;
- Consultations with stakeholders, according to IFI requirements, should be on-going for the duration of the Project as opposed to consultations concentrated during the permitting period;
- The establishment and implementation of a Project dedicated grievance mechanism (easy to access for all stakeholders, including vulnerable groups) is required by IFIs, in addition to the national administrative grievance procedures;
- IFIs require longer disclosure and commenting periods for environmental and social impact assessments. For Category A projects operated by the private sector, IFC and EBRD require disclosure of 60 days.

¹³ EBRD PR 10, in the Environmental and Social Policy from 2014 - <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>
 IFC PS 1 - https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps1

The SEP has been developed to address the above listed gaps and to ensure that all IFI requirements in connection to stakeholder engagement are being adequately addressed by the Project.

5 Stakeholders Identification and Analysis

Stakeholders are persons and/or institutions and/or communities who:

- are directly and/or indirectly affected by the Project,
- have “interests” in the Project that determine them as stakeholders; and/or
- have the potential to influence the Project outcomes or operations.

Stakeholder identification considers the nature and location of the Project and the nature of potential impacts, as well as institutional, legal and managerial framework applicable to the Project.

Main stakeholders identified at this stage of the Project, both internal and external, are listed in Table 1 below, which will be updated and modified during the Project development and as a result of cooperation with key stakeholders.

As is the case with many publicly owned companies, engagement with internal stakeholders falls under the jurisdiction of the Company’s Human Resources (HR) and legal departments. Therefore, this SEP includes a more detailed description of engagement with external stakeholders only.

If you wish to be on an e-mailing list to get information about new projects, activities, or when new information is made publicly available, please send a request using any of the contact details listed in Section 8 of this SEP.

Table 1: Identified Stakeholders

Group of Stakeholders	Number / population	Description of stakeholders
Persons / entities who will be physically and/or economically displaced by the closure of the existing landfill	17 households Approx. 270 7 private recycling companies and LAFARGE BFC	<ul style="list-style-type: none"> • Households living in the informal settlement Vinča on the territory of the landfill who will be physically displaced • Persons engaged in waste picking and collection (for PECS or private companies), who will lose their source of livelihood once this activity can no longer be performed on the landfill • Private companies engaged in the collection and sorting of waste on the landfill under contract with PECS
Persons/entities affected by land acquisition for the expansion of the Vinča landfill	Unknown at present <i>Approx. 1,150 plots of land</i>	<ul style="list-style-type: none"> • Owners of land (individuals, legal entities, local administration) acquired for the Project, in the metropolitan municipalities Grocka (Vinča cadastral municipality), Zvezdara (Mali Mokri Lug cadastral municipality) and Palilula (Slanci cadastral municipality) • Users of land acquired for the Project, under formal arrangements (rent contracts) or informal use

Group of Stakeholders	Number / population	Description of stakeholders
Local population residing in settlements near the Vinča landfill	Unknown	<ul style="list-style-type: none"> • Settlements: Vinča, Mirijevo, Slanci, Veliko Selo • Persons residing / working along the Smederevo road and the access road leading to the landfill, who may be affected by Project related transport
General population of the City of Belgrade	1.7 million	<ul style="list-style-type: none"> • Beneficiaries of waste management services (households, entities).
Administrative Bodies and Authorities of the Republic of Serbia	N/A	<ul style="list-style-type: none"> • Government of Serbia • Ministry of Environmental Protection • Ministry of Construction, Transport and Infrastructure • Ministry of Mining and Energy • Ministry of Finance • Ministry of Labour, Employment, Veteran and Social Affairs • Ministry of Public Administration and Local Self-Governance • Agency for Environmental Protection
Administrative Bodies and Authorities of the City of Belgrade	N/A	<ul style="list-style-type: none"> • Mayor, City Council and Assembly • City Secretariats for Social Protection, Energy, Finance, Urbanism, Property and Legal Affairs, etc. • Belgrade Land Development Agency (Beoland) • Public Defender's Office • RAP Working Group • Public Enterprise City Sanitation (PECS) • Public Procurement Service • PUC Urban Development • PUC Infostan • Office for the Protection of Cultural Monuments
Urban municipality Grocka	N/A	<ul style="list-style-type: none"> • Mayor of Grocka • Local council of Grocka
City of Šabac / municipality Vladimirci and municipal service providers	N/A	<ul style="list-style-type: none"> • Mayor of Šabac / municipality Vladimirci • Local Council and Assembly • City Departments for General Administration, Social Activities (social welfare and education), Utility and Housing Activities, Finances, etc. • Centre for Social Protection
National Employment Service (NES) with municipal branch offices	N/A	<ul style="list-style-type: none"> • Central Office in Belgrade

Group of Stakeholders	Number / population	Description of stakeholders
		<ul style="list-style-type: none"> Branch offices in municipalities where affected waste pickers have registered residence
Utility companies whose networks will be a part of the construction of associated facilities	N/A	<ul style="list-style-type: none"> Beoelektrane Elektroprivreda Srbije (EPS)
Non-Governmental and Civil Society Organisations (NGOs and CSOs)	N/A	<ul style="list-style-type: none"> CEKOR, Subotica Birdlife International, Serbia Citizen's Association "Pravo na grad" (The Right to the City) A11, Initiative for Economic and Social Rights, Belgrade
Media	N/A	<ul style="list-style-type: none"> Print: Privredni Pregled, Danas, Politika, Blic Radio and TV: Radio Beograd 1,2,3, RTS1 and RTS2 CoB website: https://www.beograd.rs BCE website: https://www.bcenergy.rs
International Financial Institutions	N/A	<ul style="list-style-type: none"> EBRD IFC
Internal stakeholders	Approx. 50 Approx. 50 500 at peak	<ul style="list-style-type: none"> PECS workers BCE workers Contractor and subcontractor workers

6 Previous Stakeholder Engagement and Information Disclosure

6.1 Early Project Stakeholder Engagement

Several disclosure and consultation events in relation to the planning of the Project, took place since 2010, as follows:

- The Waste Management Plan of the City of Belgrade 2011-2020¹⁴ (together with a Strategic EIA Report for the Plan), which lays down the strategic objectives of the City of Belgrade in terms of waste management. A meeting was held with NGOs dealing with environmental protection, to present them with the draft Waste Management Plan, on 08.04.2011. Following that, on 11.04.2011. the draft was presented to representatives of all metropolitan municipalities and representatives of all public communal enterprises founded for the collection, transport and disposal of municipal waste in metropolitan municipalities. On 14.04.2011 an announcement was published in the daily newspaper Politika (with national coverage) and on the City website, informing all interested stakeholders that the draft of the document is available for review (in electronic and hard copy) and comments, until 05.05.2011. Comments were received only from

¹⁴ Official Gazette of the City of Belgrade, no. 28/2011

other City secretariats and the Institute for Public Health, and the draft was finalised and adopted by the City Assembly.

- The Plan for the Detailed Regulation of the Vinča Landfill in the Grocka Municipality¹⁵ (together with a Strategic EIA Report for the Plan). The draft of this Plan was available for review (in electronic and hard copy) and comments from 24.11. to 24.12.2014. A session of the Planning Committee was held on 29.01.2015. which was open to the public, to discuss all received comments. The Plan was adopted by the City Assembly in April 2015.

The Project pre-bidding conference was held in March 2015, which was open to the public and the media and at which the Project was presented in detail. Upon selection of the successful bidder, SPV BCE, was formed in September 2017, to manage the Project.

The Project has been presented to Belgrade citizens many times over the past few years through the media, with information on progress being made towards creating a sustainable waste management solution for the City. Grievances are regularly being handled in relation to all utilities, including waste management, through the Belgrade Communal Service (BEOKOM), as described in Section 8 of the SEP.

6.2 EIA Scoping Phase

The Request for Determining the Scope and Content of the EIA for the Construction of the Facility for Use of Communal Waste and Landfill Gas for Energy was submitted to the Ministry of Environmental Protection in April 2018 and was disclosed on the Ministry website (and in hard copy in the premises of the Ministry) and in the daily national newspaper Politika (14.04.2018.), as required under national legislation. It was available for comments for a period of 15 days. Comments on the Request were submitted by three organisations and three individuals.

Following that, the EIA Scoping Decision of the Ministry of Environmental Protection was issued on May 30th 2018 and was disclosed in the same way as the Request, for a period of 10 days. As part of the Decision, comments received as well as the responses provided by BCE, were also publicly disclosed.

6.3 Engagement in Relation to Land Acquisition, Physical and Economic Displacement

6.3.1 Physical and Economic Displacement

During RAP Development, the RAP Working Group¹⁶ established by the Mayor of Belgrade and particularly the City Secretariat for Social Protection had numerous meetings with households which live in the informal settlement on the Vinča landfill and will be physically displaced by the Project. The first census was carried out on 03.12.2014, the second on 16.01.2015 and the third and final census on 08.06.2016 (when the socio-economic survey was also carried out). This last date has been established as the cut off date for eligibility to resettlement, as presented in the Project RAP. Regular visits were made to the settlement since then, with the latest consultation meeting held with affected households on 14.06.2018 in the settlement.

Meetings were held with other stakeholders as well, particularly the Ministry of Labour, Employment, Veteran and Social Affairs, the Ministry for Public Administration and Local Self Governance and

¹⁵ Official Gazette of the City of Belgrade, no. 17/2015

¹⁶ Decision of the Mayor of the City of Belgrade no. 020-3678/16-G-01, from 26th June 2016, amended by the Decision of the Mayor of the City of Belgrade no. 020-6553/17-G from October 18th 2017 and Decision no. 020-4111/18G from June 12th 2018

National Employment Service, whose support the RAP Working Group requested for the development and implementation of the RAP.

During June and July 2018, meetings were held with PECS, companies engaged in waste collection at the Vinča landfill and with waste pickers (engaged by both PECS and the private companies), to assess the impact of the Project on livelihoods and propose adequate mitigation measures in the RAP.

In August, the City Secretariat for Social Protection met with representatives of the City of Šabac and the municipality Vladimirci, to determine the current living conditions of the affected people in the locations where they have registered residence and to discuss the responsibilities of these local self-governments in RAP implementation.

A more detailed overview of meetings and activities with various stakeholders is available in the Project RAP. The RAP was disclosed for comments in August 2018¹⁷, together with the revised Detailed Regulation Plan (see section 6.4 of this SEP). A separate meeting was held by the City Secretariat for Social Protection with households which will be physically displaced, on 21st August 2018 (with organised transport from the Vinča landfill) to present them with the RAP and how resettlement will be organised. The RAP was adopted by the City Assembly in October 2018¹⁸.

6.3.2 Land Acquisition

Based on the Plan for Detailed Regulation which was in force during 2014¹⁹, administrative transfer of public land and expropriation of privately-owned land were carried out for the expansion of the boundaries of the landfill. Public interest was determined by the Decision of the Government of the Republic of Serbia 05 no. 465-13403/2014, from 30th October 2014²⁰ and the Decision of the Government of the Republic of Serbia 05 no. 465-14254/2014, from 14th November 2014²¹. Owners and users of the affected land were contacted in writing by local authorities and individual meetings were held in the municipality Grocka during 2015, where the expropriation process and their rights were explained to them, as required under national law. Some of the needed land territorially belongs to the municipalities Zvezdara and Palilula, where the expropriation process is also being implemented.

Apart from the mentioned municipalities, other stakeholders involved in the land acquisition process are the Belgrade Land Development Agency, the CoB's Public Defender's Office and the CoB Working Group for Land Acquisition. The members of working group for Land Acquisition are from the following institutions: Deputy Mayor, Secretariat for Environmental Protection, Secretariat for Property and legal affairs, Urbel, PUC Gradska cistoca, Secretariat for urban planning and construction, Belgrade Land Development Agency, the CoB's Public Defender's Office, Cadastre Grocka, Grocka municipality.

At the time of developing this SEP, the City is preparing a more detailed report on land acquisition carried out for the Project and any associated economic displacement impacts (see section 7.2).

6.4 Other Project Stakeholder Engagement

Based on a decision of the CoB Assembly from 21.12.2017. a Revised Plan for the Detailed Regulation of the Vinča Landfill in the Grocka Municipality was developed and disclosed in its early draft version in the period 29.01. to 12.02.2018. Since the adoption of the original plan, apart from a newly adopted technological solution, landslides and cracks have caused waste to move in the direction of the Danube

¹⁷ <http://www.beograd.rs/lat/gradski-oglasii-konkursi-i-tenderi/1751606-javni-uvvid-u-nacrt-odluke-o-neophodnosti-iseljenja-sa-planom-preseljenja-domacinstava-koje-zive-u-neformalnom-naselju-na-lokaciji-deponije-vinca/>

¹⁸ "Official Gazette of the City of Belgrade no. 86/2018

¹⁹ Waste Landfill Regulation Plan on the Right Bank of the Danube River – "Vinča" landfill

²⁰ "Official Gazette of RS" no. 120/14

²¹ "Official Gazette of RS" no. 126/14

river, thereby requiring changes in the Planned project (changed layout of structures) and a revised Regulation Plan.

From February to July 2018, with the support of „Beo Čista Energija d.o.o.“ when needed, the Secretariat for Environmental Protection organized meetings with the following Holders of public authorities in order to get acquainted with the subject of the Project and needs in terms of capacities and other necessary elements:

JKP "Beogradput"	PUC "Belgrade road"
Sekretarijat za saobraćaj Beograd	Secretariat for Transport Belgrade
JKP "Srbijavode"	PUC "Serbian water"
JKP "Beogradski vodovod i kanalizacija"	PUC "Belgrade water and sewerage"
JP "Elektromreža Srbije"	PC "Serbian Electricity Transmission System"
"Elektrodistribucija Beograd" d.o.o.	Electric Power Distribution Belgrade l.l.c.
AD Telekom Srbija	"Telecom Serbia"
JKP "Gradska Čistoća"	PUC "Gradska Čistoća"
JKP "Beogradske elektrane"	PUC "Belgrade power plants"
Zavod za zaštitu spomenika kulture grada Beograda	Belgrade Institute for the Protection of Cultural Monuments
Direktorat civilnog vazduhoplovstva Republike Srbije	Civil Aviation directorate of the Republic of Serbia
JKP "Gradsko Zelenilo"	PUC "City Greenery"
Zavod za zaštitu prirode Srbije	Institute for Nature Protection of Serbia

The Revised Regulation Plan²², which is also accompanied by an updated strategic EIA was disclosed for review (in electronic and hard copy) and comments from 15.08.2018. to 30.08.2018. A public session of the Planning committee where all submitted comments were discussed was held on 6th September 2018. Details are available on the CoB website²³. The revised Plan was adopted by the City Assembly in October 2018.

7 Planned Stakeholder Engagement

This SEP includes a clear plan of actions with deadlines and responsibilities in order to assure the maximum engagement level for all relevant stakeholders.

An initial Stakeholder Engagement Action Plan for stakeholders identified at this stage is shown in Table 2. This table will need to be updated regularly.

All communication methods noted in the Table 2 below (including press releases, website notifications, reports, meetings, etc.) will be in the local language. The documentation intended for international stakeholders will be prepared in English as well.

7.1 ESIA Disclosure and Consultation

From the 12th October 2018, the following documents are available in Serbian and English for review and comments:

²² Official Gazette of the City of Belgrade, no. 86/2018

²³ <http://www.beograd.rs/lat/gradski-oglasi-konkursi-i-tenderi/1750874-javni-uid-u-nacrt-izmene-i-dopune-pdr-sanitarne-deponije-vinca-sa-izvestajem-o-strateskoj-proceni-uticaja/>

- The Project Environmental and Social Impact Assessment (ESIA) and Non-Technical Summary (NTS)
- The Project Environmental and Social Action Plan (ESAP)
- The Stakeholder Engagement Plan (SEP)
- Resettlement Action Plan (RAP)

Electronic versions of these documents will be available for a minimum of 60 days at the following websites:

- City of Belgrade website: <https://www.beograd.rs> (for Resettlement Action Plan (RAP) and for the rest of the documents, link to EBRD/IFC web site)
- BCE website: <https://www.bcenergy.rs>
- Municipality Grocka website: <http://www.grocka.rs> (for Resettlement Action Plan (RAP) and for the rest of the documents, link to EBRD/IFC web site)
- EBRD website: <http://www.ebrd.com>
- IFC website: <https://www.ifc.org>

Hard copies will also be available at the following locations:

- Secretariat for Environment of the CoB, address: 27 marta 43-45, Belgrade
- Grocka municipality, address: Bulevar oslobođenja 39, Grocka, Belgrade
- Entrance gate of the Vinča landfill site

Community consultation / project presentation events in relation to the draft ESIA will be held during the 60-day disclosure period. A community meeting will be held with the nearest community, to present the ESIA document (expected E&S impacts, proposed mitigation measures, the grievance mechanism w) and inform people where they can read the documents and provide comments and by when. This will be announced to local communities at least 2 weeks in advance (announcements will be made in media but also in public places in the community and it will be held somewhere close to the communities. Another stakeholder meeting will be held with NGO having in mind that NGOs that have already been active in relation to this project will be considered as primary stakeholder group to meet with. It is currently anticipated that those community and stakeholder meetings will take place on the 28.11.2018.

7.2 Land Acquisition and RAP Implementation

As mentioned earlier, a land acquisition report is being prepared by the CoB, to assess whether there were/are gaps between the land acquisition component carried out for the Project in line with the legislative requirements of the Republic of Serbia and IFI standards. If gaps are identified, corrective measures will be presented in an action plan which the CoB will implement to achieve compliance with IFI standards. This action plan will be consulted with affected people and disclosed as required by IFIs. In addition, once the detailed land requirements for associated facilities become available (transmission of electricity and heat energy), a separate RAP will be prepared and disclosed for comments, also in line with IFI standards.

The RAP has been adopted by the CoB City Council and Assembly and has been published as per Serbian legislation in the Official Gazette of the City of Belgrade 86/2018 (hard copies are available in the City Secretariat for Environmental Protection).

The Secretariat for Social Protection and the City of Šabac and municipality Vladimirci, as the main implementors, will continue to hold meetings with households planned for resettlement and will inform them of their entitlements under the RAP, as well as all practical issues in relation to their move. Meetings will also be held with wastepickers in relation to livelihood restoration activities and the

companies engaged in the collection and purchase of recycling materials. Operations of the waste pickers and companies will continue the landfill, until the old landfill is closed which is expected to happen in December 2019. Before construction starts, safety will be increased at the site, at which time, both the waste pickers and companies will be informed about these measures, as well as their responsibilities in relation to health and safety.

All other stakeholders involved in the implementation of the RAP, including the RAP Working Group, the NES, the Directorate for Construction Land and Building, PECS, the City of Šabac / municipality Vladimirci and its departments and services, etc. as well as planned disclosure and consultation events, are presented in more detail in the Project RAP, with only the key activities listed in Table 2 below.

The planned consultation and disclosure events in relation to land acquisition and displacement will be described and announced in advance, in an updated version of the SEP.

7.3 National EIA Disclosure and Consultation

Parts of the ESIA will also be submitted to the national authorities (Ministry of Environmental Protection of the Republic of Serbia) to fulfil local legislative requirements for EIAs. The scope and content of the EIA for the Construction of the Facility for Use of Communal Waste and Landfill Gas for Energy (EfW and BEP facilities) has already been determined, as described earlier, and the EIA is currently being prepared. Subject to ongoing administrative procedures (Issuance of Location Conditions), it is currently anticipated that the submission for approval of the EIA draft for the EfW and BEP facilities will take place on 20.11.2018. A separate EIA will be prepared for the remaining Project components, if requested by the Ministry and following that, submitted to the Ministry for approval, as per national legislation.

In addition to ESIA disclosure and consultation activities described in Section 7.1 of this SEP, separate meetings as per Serbian national legislation may be held during the mandatory 30-day EIA disclosure period. It is currently anticipated that the Public presentation of the EIA for the EfW and BEP facilities will take place on 20.12.2018.

All these events will be announced in accordance with legislative requirements and will be presented in an updated SEP.

7.4 Construction and Operation Phase

This SEP will be updated to provide more detailed information for stakeholder engagement during the construction phase, with the aim of:

- Providing contact details of contractor(s) and presenting their planned engagement activities with stakeholders;
- Notifying affected communities in advance of any activities which may result in short term disruptions;
- Providing individuals and communities with information on the progress of construction and its implications;
- Monitoring the implementation of mitigation measures and assessing the impacts of construction on affected stakeholders and communities;
- Monitoring community attitudes and grievances during the construction phase.

As the project transitions into the operations phase, the SEP will again be updated to present activities which will be implemented in this phase, with the aim of:

- Reporting on the implementation of the SEP and grievance management;

- Communicating the results of environmental and social monitoring and auditing carried out during the operations phase to stakeholders;
- Informing the public on the increase of waste management tariffs, which are planned to be introduced when the waste treatment plant becomes operational;
- Managing and monitoring the effectiveness of any corrective actions implemented as a result of stakeholder concerns or complaints during operations.

Table 2: Stakeholder Engagement Action Plan

Stakeholders	Type and method of communication	Timing and venue	Responsibility	Main topics of interest and for discussion
All stakeholders	Media campaign <ul style="list-style-type: none"> • Print: Privredni Pregled, Danas, Politika, Blic • Radio and TV: Radio Beograd 1, 2, 3, RTS1 and RTS2 • CoB website: https://www.beograd.rs • BCE website: https://www.bcenergy.rs 	Starting from September 2018 and ongoing throughout Project implementation	City of Belgrade BCE	<ul style="list-style-type: none"> • Information about the Project, including: <ul style="list-style-type: none"> - Description of Project components - Implementing agencies and Project financing - Timing of Project components - Progress in permitting - Planned disclosure and consultation events
Households living in the informal settlement Vinča on the territory of the landfill who will be physically displaced	Group meetings Individual household meetings Written notices Contract for social housing / restoration or construction of a house	August 2018 – completion of resettlement and livelihood restoration October 2018	City of Belgrade Secretariat for Social Protection (Belgrade residents) City of Šabac / municipality Vladimirci (Šabac / Vladimirci residents)	<ul style="list-style-type: none"> • RAP components: eligibility, housing entitlements (social housing, assistance to repair and/or construct houses, other forms of housing), assistance measures (access to personal documents, health, education, employment, etc.), timing, etc. • Grievance management
Persons engaged in waste picking and collection (for PECS or private companies), who will lose their source of livelihood once this activity can no longer be performed on the landfill	Group meetings Individual meetings Written notices Safety and warning signs Employment contracts	August 2018 – completion of all livelihood restoration activities	City of Belgrade Secretariat for Social Protection (Belgrade residents) City of Šabac / municipality Vladimirci (Šabac / Vladimirci residents) Other municipalities where waste pickers have registered residence National Employment Service and its branch offices	<ul style="list-style-type: none"> • Changes which will be introduced in accessing the landfill when construction begins • Health and safety issues during construction and responsibilities • Timely information about when wastepicking will no longer be possible at the landfill • RAP components: eligibility, livelihood restoration entitlements (assistance to access employment, training, personal documents, etc.), timing, responsibility for implementation, etc. • Ongoing information about employment opportunities and assistance measures as they become available • Grievance management

Stakeholders	Type and method of communication	Timing and venue	Responsibility	Main topics of interest and for discussion
Private companies engaged in the collection and sorting of waste on the landfill under contract with PECS and LAFARGE BFC	Group meetings Written notices Safety and warning signs Contracts for operations at the landfill	August 2018 – December 2019 (closure of the existing waste dump)	PECS City of Belgrade Secretariat for Social Protection BCE	<ul style="list-style-type: none"> Changes which will be introduced in accessing the landfill when construction begins Health and safety issues during construction and responsibilities Possibilities for cooperation with CoB on recycling after the Vinča landfill closes
Persons/entities affected by land acquisition for the expansion of the Vinča landfill	Individual meetings with owners and users of affected land Written notices Expropriation decisions and other administrative and court notices	Ongoing until completion of all land acquisition (expected by the end of 2018) and restoration of livelihoods	Belgrade Land Development Agency Public Defender's Office Municipalities Grocka, Zvezdara, Palilula	<ul style="list-style-type: none"> Expropriation process, compensation for affected land and assets, assistance to restore livelihoods Results of the land acquisition audit and corrective action plan, if needed
Local population residing in settlements near the Vinča landfill (Vinča, Mirijevo, Slanci, Veliko Selo) General population of the City of Belgrade, i.e. beneficiaries of waste management services (households, entities).	ESIA consultation meeting Disclosure of the ESIA, NTS, ESAP, SEP and RAP National EIA disclosure and consultations Grievance mechanism Information in the media, including websites listed in Section 7.1.	In locations listed in Section 7.1 From commencement of the disclosure period as listed in Section 7.1 TBD Throughout Project implementation Throughout Project implementation	City Secretariat for Environmental Protection Other relevant CoB departments BCE, ESIA consultants Ministry for Environmental Protection Construction contractor	<p>ESIA disclosure and consultations:</p> <ul style="list-style-type: none"> Description of the Project expected positive and negative impacts, as well as planned mitigation measures. Planned stakeholder engagement activities Project implementation timelines Opportunities for direct and indirect Project employment, local procurement Project grievance mechanism Other issues of interest <p>During construction:</p> <ul style="list-style-type: none"> Contact details of contractor(s) and presenting their planned engagement activities with stakeholders; Notifications of any activities which may result in short term disruptions of utilities, traffic;

Stakeholders	Type and method of communication	Timing and venue	Responsibility	Main topics of interest and for discussion
	Information through the project construction boards in construction locations; construction signs and warnings Published project progress and monitoring reports	Throughout construction Throughout Project implementation		<ul style="list-style-type: none"> Information on the progress of construction and its implications; <p>During operation:</p> <ul style="list-style-type: none"> Project progress Monitoring reports including monitoring of grievances Improvement of waste management services and associated changes in tariffs
Non-Governmental and Civil Society Organisations (NGOs and CSOs)	As above Correspondence and meetings	Starting from disclosure period and throughout Project implementation	Secretariat for Environment BCE	As above
Administrative Bodies and Authorities of the Republic of Serbia Administrative Bodies and Authorities of the City of Belgrade	ESIA consultation meeting Disclosure of the ESIA, NTS, ESAP, SEP and RAP National EIA disclosure and consultations Official correspondence and regular meetings Permitting requests Project progress reports	Ongoing throughout Project implementation	Secretariat for Environment Other relevant CoB departments BCE	As above
Urban municipalities Grocka, Zvezdara, Palilula	Official correspondence and regular meetings	Ongoing, until the completion of land acquisition	Belgrade Land Development Agency Public Defender's Office	<ul style="list-style-type: none"> Expropriation process, compensation for affected land and assets, assistance to restore livelihoods Cooperation in carrying out the land acquisition audit and development and implementation of the corrective action plan, if needed

Stakeholders	Type and method of communication	Timing and venue	Responsibility	Main topics of interest and for discussion
			Secretariat for Environmental Protection	
City of Šabac / municipality Vladimirci and service providers National Employment Service (NES) with municipal branch offices	Delivery of the adopted RAP Official correspondence and regular meetings	After RAP adoption, until all resettlement and livelihood restoration has been completed	City Secretariat for Social Protection RAP Working Group	<ul style="list-style-type: none"> Responsibilities from the RAP Organisation of resettlement and livelihood restoration activities Cooperation on grievance management from the RAP
Utility companies whose networks will be expanded for the Project	Official correspondence and regular meetings	Prior to and throughout the implementation of the Project	City Secretariat for Environmental Protection BCE Contractor	<ul style="list-style-type: none"> Development of electricity / heat production project documents and plans Progress with permitting and construction Transfer of ownership over facilities after construction Maintenance responsibilities during operation
Media	Press releases Press conferences Disclosure of the ESIA, NTS, ESAP, SEP and RAP National EIA disclosure and consultations	Prior to and throughout the implementation of the Project	City Secretariat for Environmental Protection BCE	<ul style="list-style-type: none"> Project progress updates Upcoming disclosure and consultation events
International Financial Institutions	ESIA package (draft and final documents) Official correspondence and regular meetings Project progress reports	Prior to and throughout the implementation of the Project	City Secretariat for Environmental Protection BCE	<ul style="list-style-type: none"> ESIA package documents (drafts and final) Reports on grievance management Environmental and Social reports
PECS employees	Individual meetings Internal workers' meetings Announcement boards	Prior to and throughout Project implementation	PECS Management City of Belgrade	<ul style="list-style-type: none"> Information on new employment posts and locations of work, once the Vinča landfill closes Human resources policy Internal employee grievance mechanism

Stakeholders	Type and method of communication	Timing and venue	Responsibility	Main topics of interest and for discussion
	Employee grievance/feedback mechanism			<ul style="list-style-type: none"> • Health and safety procedures • Codes of conduct • ESMP measures
BCE employees	Individual meetings Internal workers' meetings Announcement boards Employee grievance/feedback mechanism	Prior to and throughout Project implementation	BCE Management	<ul style="list-style-type: none"> • Human resources policy • Internal employee grievance mechanism • Health and safety procedures • Codes of conduct • ESMP measures
Temporary construction workers, subcontractors	Official correspondence Meetings Code of conduct Information in contract Trainings Employee grievance mechanism	Prior to and during construction	BCE Management Contractors' management	Information in contract on standards and expectations with respect to: <ul style="list-style-type: none"> • Environmental protection and social impacts • Occupational health and safety at work • Code of conduct including disciplinary measures • Security measures • Access to sites • Interaction with the community • Employee grievance mechanism Regular monitoring of performance of contractors in the implementation of the above.

8 Grievance Mechanism

The City Secretariat for Environmental Protection, BCE and the contractor will accept and respond to all suggestions and complaints associated with the Project. A sample Grievance Form is provided as Appendix A of this SEP. Any person or organisation may send comments, complaints and/or requests for information in person or via post, telephone or email using the contact information provided below. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Serbia.

The CoB manages communication with citizens in relation to all city communal services through the Belgrade Communal Service (BEOKOM) - see contact information with free telephone lines and website below. All questions and complaints in relation to the Project received by BEOKOM will be forwarded to the City Secretariat for Environmental Protection, for recording and addressing as part of this grievance mechanism.

All grievances will be registered and responded to within 30 calendar days, either verbally or in writing, in accordance with the preferred method of communication specified by the complainant. Individuals who submit their comments or grievances have the right to request that their name be kept confidential. Grievances can also be submitted anonymously, however this may limit the possibilities for investigation of complaints and providing a response.

Grievances in relation to construction activities will be addressed by BCE and the construction contractor and their management will be monitored by the City Secretariat for Environmental Protection. Contact details for the contractor will be provided as soon as they become available, in an updated SEP.

The City Secretariat for Environmental Protection will keep a unique grievance log of all received grievances for this Project, including the ones received and addressed by BCE and the contractor and will report on grievance management to the CoB and the IFIs, every 4 months during construction and annually during operation.

A separate grievance mechanism is available for grievances in relation to resettlement and waste collection carried out at the Vinča landfill, as described in the Project RAP. Grievances of employees, including those of the contractor, will be addressed through internal grievance mechanisms.

BCE will accept all comments and complaints with the Project and address them in the following timeframe:

- Written acknowledgement of receipt of the grievance within 5 working days of submission
- Proposed resolution within 30 days of receiving the grievance

During Construction and Operation, a community liaison officer, assigned by BCE, will handle all grievances received by the community during the lifetime of the project.

BCE will respond to either verbally or in writing in accordance with the preferred method of communication specified by the complainant, if contact detail of him/her are provided.

Individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulation.

BCE will keep a grievance log of all grievances received by the Project Company, the O&M Contractor and the EPC Contractor.

City Secretariat for Environmental Protection

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Beo Čista Energija d.o.o. Ltd.

Contact Person: Gordana Jelenić, Managing Director Assistant

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Telephone number: +381 11 715 4885

Email address: bce@bcenergy.rs

9 Resources and Responsibilities

The implementation of this SEP is the overall responsibility of the CoB (City Secretariat for Environmental Protection), with support from BCE. Responsibility for individual activities foreseen by the SEP is listed in Table 2.

The City Secretariat for Environmental Protection has nominated one employee (stakeholder engagement officer) who will regularly follow all commitments from the SEP and coordinate their implementation. The SE officer will liaise closely with BCE and will be in contact with all relevant persons / departments who have responsibility for implementing other activities from the SEP and will update the SEP with results of these activities upon their implementation. The SE officer will also manage the grievance mechanism and will ensure that the grievance log is kept up to date.

The SE officer will participate in stakeholder engagement events, monitor the implementation of the SEP, prepare reports for approval by the CoB and submission to the IFIs. The SE officer will also propose new stakeholder engagement events based on the results of monitoring and will update the SEP.

10 Monitoring of Stakeholder Engagement and Reporting

10.1 Monitoring

A set of Key Performance Indicators (KPIs) have been defined to enable monitoring and evaluation of the implementation of the SEP and guide updates and revisions of the document:

- SEP in place, up to date and available to the public for comment;
- SEP document integrates comments received from public as appropriate;
- All planned actions from SEP implemented as scheduled;
- Grievance procedure operating as planned (as evidenced by an up-to-date grievance register) including recording;

- Contractor contracts include clauses obligating them to adopt SEP requirements, as appropriate;
- Report on the implementation of the SEP and grievance management made available as part of corporate reporting and the Project's environmental and social reporting.

10.2 Reporting

The SEP will be updated periodically (at least once every 4 months) to:

- record consultations undertaken, issues raised, actions taken;
- describe lessons learned and any changes to the disclosure and consultation process; and
- outline the schedule for on-going and future interaction with stakeholders.

Before and during construction the City Secretariat for Environmental Protection and BCE will produce quarterly Environmental Health Safety and Social (EHSS) reports, which will also include a summary of the Project's performance on grievance management (number, type and source of complaints; number of resolved complaints and average time for resolution of complaints, gender segregated). These reports will be submitted to the CoB Mayor's cabinet and relevant other CoB departments, as well as the IFIs and will be posted on the websites of the CoB and BCE. Upon the completion of construction, i.e. during operation, these reports will be prepared and issued annually.

Appendix A: Sample Grievance Form

Grievance Form

Reference No:	
Section 1 – Optional (Do not fill in if you wish to stay anonymous. Please note that if you stay anonymous we will not be able to inform you of the outcome of this grievance)	
Full Name	
Contact Information	By Post: Please provide mailing address: _____ _____ _____
Please mark how you wish to be contacted (mail, telephone, e-mail).	By _____ Telephone: _____
	By _____ E-mail _____
Section 2	
Description of Inquiry, Incident or Grievance:	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Inquiry/Incident/Grievance	
	One-time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
Section 3	
What would you like to see happen to resolve the problem?	