

# Environmental and Social Assessment for EBRD

CATEGORY A PROJECT

## ŽIVINICE REGIONAL SOLID WASTE PROJECT BOSNIA AND HERZEGOVINA

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## STAKEHOLDER ENGAGEMENT PLAN

21 June 2018

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## Abbreviations

BiH	Bosnia and Herzegovina
EBRD	European Bank for Reconstruction and Development
EBRD ESP	EBRD's Environmental and Social Policy
EIA	Environmental Impact Assessment
ESAP	Environmental and Social Action Plan
FBiH	Federation of Bosnia and Herzegovina
FMET	Federal Ministry of Environment and Tourism
IDP	Internally displaced persons
NGO	Non-governmental Organisation
NTS	Non-Technical Summary
PR	Performance Requirements
RSL	Regional Sanitary Landfill
SEP	Stakeholder Engagement Plan

# 1 INTRODUCTION

## 1.1 Project Description and Context

### Introduction

The European Bank for Reconstruction and Development (“EBRD”) is considering providing finance to the Živinice Regional Solid Waste Project (the “Project”).

The Project involves the construction and operation of an EU-compliant regional sanitary landfill (“RSL”) that will serve three municipalities in Tuzla Canton: Živinice, Banovići and Kladanj. The chosen location is “Separacija 1” in Živinice.

The three Municipalities signed an agreement in 2012 on the establishment of an inter-municipal council for implementation of the Project.

The Project will be financed by an EBRD loan of up to EUR 6 million and potentially co-financed with an investment grant. The Borrower will be Bosnia and Herzegovina (“BiH”) and the loan will be provided via a cascade of sub-loans to the Public Enterprise “Eko-Sep” d.o.o. Živinice, Waste Management Centre “Separacija 1” (“Eko-Sep”). Eko-Sep was incorporated in 2013. It is owned by three Municipalities: 60% by Živinice, 30% by Banovići and 10% by Kladanj, and is seated in Živinice.

As this Project involves the development of a greenfield facility, it has been categorized as a Category A project in line with EBRD’s Environmental and Social Policy (2014)<sup>1</sup>.

### Current Waste Management Practices

All three target municipalities are currently disposing of their waste at non-sanitary landfills without any control of pollution generated by leachate and biogas discharge, with the exception of a part of municipal waste collected from the Municipality of Živinice that is disposed of at RSL “Crni Vrh” in the Municipality of Zvornik. Current waste management practices in these three Municipalities pose a risk to human health and the environment. In line with the strategic and legal framework at federal, cantonal and local level, all non-sanitary landfills need to be closed and rehabilitated. In order to meet these strategic objectives, the Municipalities are required to dispose of municipal waste on regional sanitary landfills, which will be enabled through the implementation of this Project.

### Project Benefits

The key benefits of the Project are:

- Discontinuation of the current practice of non-sanitary disposal of municipal waste in Banovići, Kladanj and Živinice, which will lead to improvement of the environmental and health situation. Approx. 100,000 people will benefit from improved waste management
- Fulfilment of strategic and operational objectives defined in the waste management strategies and plans at federal, cantonal and municipal level
- Conversion of existing unused and heavily degraded area into a modern regional centre for waste disposal and recycling
- Improvement of visual characteristics of the existing heavily modified area by planned recultivation of the RSL site

<sup>1</sup> According to EBRD, a project is categorised A when it could result in potentially significant adverse future environmental and/or social impacts and therefore requires an environmental and social impact assessment.

- Improvement of local road infrastructure, including reconstruction and upgrade of the existing access bridge over River Oskova
- Increased employment opportunities for local population (approx. 15-20 workers during operation)

### Overview of Previous Activities

Project preparation is well-advanced due to previous activities on Project preparation. The Project has:

- a Location Study and Feasibility Study prepared in 2012<sup>2</sup>,
- a local Environmental Impact Assessment (“EIA”) study prepared by the Mining Institute Tuzla in 2015, with an accompanying Waste Management Plan,
- a Main Design for the RSL, prepared in 2016<sup>3</sup>,
- Environmental, Water Management and Construction Permits issued by local authorities.

The Location Study and the Feasibility Study confirmed that the chosen location is the most optimal location for the future RSL. Eko-Sep purchased the land and obtained all the necessary permits for the construction of the RSL.

### Description of the Landfill Site

"Separacija 1" is situated in the Municipality of Živinice at a distance of:

- approx. 12 km from the urban zone of Živinice,
- approx. 4 km of from the centre of Municipality of Banovići, and
- 43 km from the centre of Municipality of Kladanj.

The location of the planned RSL is shown in Figure 1 below.

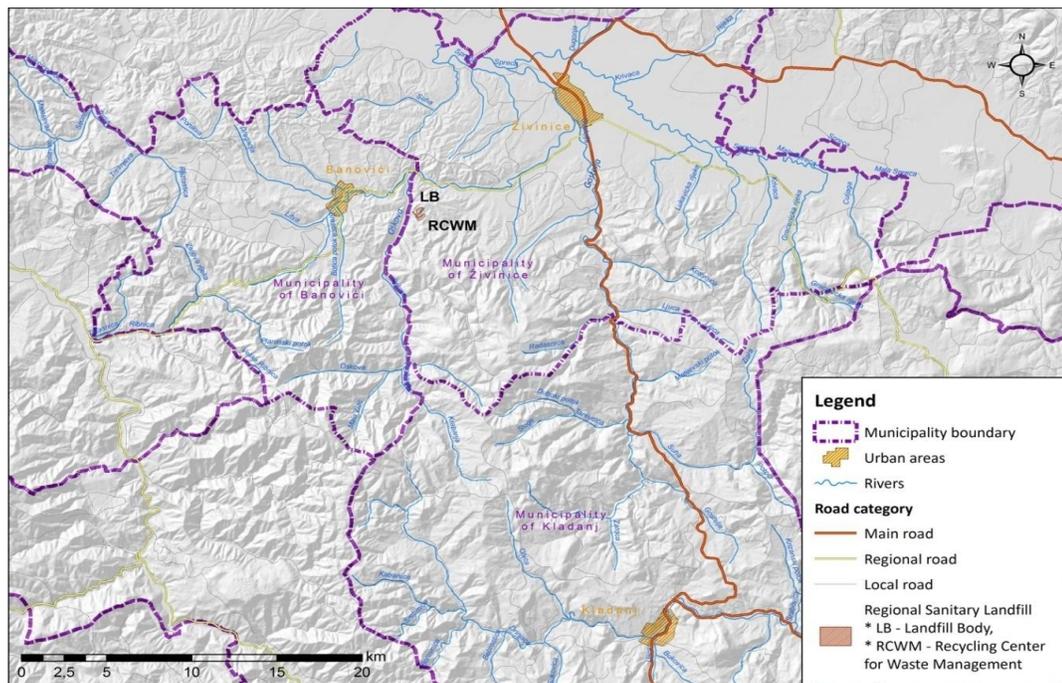


Figure 1: Location of the Future RSL "Separacija 1"

<sup>2</sup> By the German consulting company Fichtner

<sup>3</sup> "IPZ Uniprojekt Terra" Ltd. Zagreb, "AKSA" Ltd. Zenica, "Tomić inženjering" Ltd. Ljubuški, "TZI-inženjering" Ltd. Sarajevo, "TERMOTEHNIKA INŽINJERING" Ltd. Zenica and "ELECTRA" Ltd. Sarajevo

The site had been used for many years as a disposal site for tailings from the local coal mine. The current state of the site is therefore modified and degraded (Figure 2).



*Figure 2: Current state of the LB at RSL site*

The site can be reached from the regional road R-469 Ribnica-Banovići-Živinice which is connected to a 1 km long local paved road. From the local road, an unpaved road leads to the entrance of the landfill site, which is about 1.2 km long and 5-7 meters wide. It is currently in poor condition and will need to be reconstructed.

The Oskova River flows at approx. 300 m west from the planned location of the landfill body. The bridge across the Oskova River (Figure 3) is planned to be reconstructed to enable access of heavy transport trucks to the landfill site.



*Figure 3: Access bridge to the location of the RSL over the "Oskova" River*

The nearest settlement "Ježevac" (Figure 4) is located at an air distance of approx. 500 m – it is a settlement inhabited by internally displaced persons (IDP), currently used by 64 families.



Figure 4: IDP settlement "Ježevac"

Description of Planned Activities

The RSL will be constructed in four phases as described in Table 1 below. The EBRD loan will be used to implement Phase 1 and Phase 2 of the Project.

Table 1: Project Phases

PHASE 1	<ul style="list-style-type: none"> <li>• <b>Stage 1:</b> construction of: entry-exit zone (front gate, asphalted road, weighbridge with a canopy, and oil and grease separator and sedimentation tank), part of the fence around part of the landfill, administrative building and associated parking lot, service centre with associated plateau, internal roads, first part of the landfill disposal area with a system for collection and recirculation of leachate and passive degassing system and peripheral roads around the parts of cells, perimeter canal around the landfill to receive storm-water, tank/precipitator to collect storm-water, platform for washing of vehicles, water supply network, sewage and electrical power supply network, and purchase of landfill machines</li> <li>• <b>Stage 2:</b> construction of the recycling yard with canopy</li> <li>• <b>Stage 3:</b> construction of the surface area for treatment of construction waste</li> <li>• <b>Stage 4:</b> construction/installation of a flare for burning of landfill gas (in 2021, or five years after the commissioning of the RSL)</li> <li>• <b>Stage 5:</b> construction of the remaining part of the landfill cell for waste disposal</li> <li>• <b>Stage 6:</b> partial closure of the landfill with final capping layer</li> </ul> <p style="text-align: center;">Planned surface: 12.2 ha</p>
PHASE 2	<ul style="list-style-type: none"> <li>• <b>Stage 1:</b> construction of a facility for mechanical biological treatment of waste in the reserved part of the site</li> <li>• <b>Stage 2:</b> construction of a composting plant for processing of organic waste in the reserved part of the site</li> <li>• <b>Stage 3:</b> construction of cells for disposal of waste with a system to collect leachate in the reserved part of the site and a canal for collecting storm-water</li> <li>• <b>Stage 4:</b> construction of sorting facility waste in the reserved part of the site</li> <li>• <b>Stage 5:</b> construction of a transfer station in the Municipality of Kladanj at the location of the current municipal landfill "Stanovi" with all the necessary equipment (truck trailers) and equipment necessary for the operation of the station. The location needs to accommodate a loading bay area of about 5,000 m<sup>2</sup></li> <li>• <b>Stage 6:</b> construction of a waste management transfer substation in Kladanj</li> </ul> <p style="text-align: center;">Planned surface: 8.7 ha</p>

PHASE 3	<ul style="list-style-type: none"> <li>Construction of the facility for processing of leachate and sanitary wastewater in the reserved part of the landfill site</li> </ul>	Planned surface: 0.02 ha
PHASE 4	<ul style="list-style-type: none"> <li>Construction of the system for generation of electricity from landfill gas in the reserved part of the landfill site</li> </ul>	Planned surface: 0.03 ha

## 1.2 Objectives and Scope of the Stakeholder Engagement Plan

This Stakeholder Engagement Plan (“SEP”) was developed by Eko-Sep in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with the laws of FBiH, as well as the requirements of the EBRD.

This SEP will be updated as necessary.

## 2 REGULATORY REQUIREMENTS FOR STAKEHOLDER ENGAGEMENT

### 2.1 Local Legislation Requirements

As a public enterprise, Eko-Sep is required to apply the provisions of the *Law on Free Access to Information in FBiH*<sup>4</sup>, i.e. to **provide access to information to all stakeholders**, including every natural person or legal entity. In the framework of its capabilities, it is also obliged to undertake all necessary measures to provide assistance to natural persons or legal entities seeking to exercise their rights.

It is also required, in accordance with the *Law on Public Enterprises in FBiH*<sup>5</sup>, to operate on the **principle of freedom of access to information**, and make publicly available on its website all information regarding its work, organisation and financial management.

In addition, the *Law on Environmental Protection of FBiH*<sup>6</sup> stipulates that every person and every organisation must have **adequate access to information regarding the environment** which is at the disposal of public authorities, including information on hazardous materials and activities in their communities, and be enabled to participate in the decision making process. This Law also regulates the Environmental Impact Assessment (EIA) procedure and prescribes that **public hearings must be organised for projects that require an Environmental Impact Assessment**. The EIA must be made available to the public and a copy sent to relevant authorities and other interested parties, allowing 30 days for submitting comments, after which a public hearing is organised, and the public invited via printed (or electronic) media/radio/TV, at least 15 days in advance. The Environmental Permit is issued after the EIA is revised and all the relevant comments received from interested parties are taken into consideration<sup>7</sup>.

<sup>4</sup> Official Gazette of FBiH, No. 32/01

<sup>5</sup> Official Gazette of BiH, No. 81/08

<sup>6</sup> Official Gazette of FBiH, No. 33/03 and 38/09

<sup>7</sup> For this Project, the EIA was developed in 2015, and the environmental permit was issued in July 2015.

In line with the *Decree on Single Methodology for Developing Spatial Planning Documents*<sup>8</sup>, **public participation must be ensured during all stages of development of spatial planning documents**. Spatial plan developers are required to prepare a Public Participation Program, which includes provisions for public involvement at all stages. In addition, spatial planning documents must contain evidence of public consultations, such as minutes from public hearings, etc.

In addition, according to the *Law on Physical Planning and Land Use at the Level of FBiH*, prior to issuing of Construction Permits, Federal Ministry of Physical Planning has to provide **public access to the Main Design**, and inform the public by means of a public announcement. The public is allowed 15 days for submission of comments.

Furthermore, BiH acceded to the **Aarhus Convention on Access to Information, Public Participation in Decision Making and Access to Justice in Environmental Matters** in 2008. The Aarhus Convention grants the public rights regarding access to information, public participation and access to justice, in governmental decision-making processes on matters concerning the local, national and transboundary environment. Article 2(c) of the Convention states that the Convention applies not only to government at all levels, but also to “any other natural or legal persons having public responsibilities or functions, or providing public services, in relation to the environment, under the control of [a public authority].” In line with the Convention, Eko-Sep is required to:

- **Respond to requests from the public for environmental information** (any member of the public can make a request, regardless of citizenship, nationality or domicile)
- **Regularly collect and disclose environmental information to the public** and notify the public that the information is available; and provide information for emergencies.

## 2.2 EBRD Requirements

EBRD has set out a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. PR 10 (*Information Disclosure and Stakeholder Engagement*) of EBRD’s Environmental and Social Policy (ESP) emphasises the importance of an open and transparent engagement between the project, its workers, local communities directly affected by the project and other stakeholders as an essential element of good international practice and corporate citizenship. Stakeholder engagement involves stakeholder identification and analysis, stakeholder engagement planning, disclosure of information, consultation and participation, a grievance mechanism, and ongoing reporting to relevant stakeholders.

In accordance with PR 10, projects are required to develop and implement a Stakeholder Engagement Plan appropriate to the nature and scale or the risks, impacts and development stage of the project, and conduct stakeholder engagement on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information.

EBRD’s ESP contains specific disclosure and consultation requirements for “Category A” projects (i.e., projects which could result in potentially significant adverse future environmental and/or social impacts which cannot readily be identified). The environmental and social impact assessment process includes a public disclosure and consultation process as specified in PR 10. Where an Environmental and Social Action Plan (ESAP) has been agreed between EBRD and the project, the project must disclose the ESAP to the affected parties. The project must keep the environmental and social impact assessment in the public domain throughout the life of the project, but it may be amended, from time to time, with additional information, or archived following project completion, as long as it is available on request in a timely manner.

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<sup>8</sup> Official Gazette of FBiH No. 63/04, 50/07 and 84/10

The client is required to provide regular reports to its interested and affected stakeholders on its environmental and social performance, as a separate publication, or on its web site. These reports must be in a format accessible to the affected communities and their frequency will be proportionate to the concerns of affected communities, but not less than annually.

In line with EBRD's Public Information Policy (2014), for "Category A" projects, in addition to the disclosure required of the clients under the ESP, the Bank will make available environmental and social impact assessments on the EBRD website in its Headquarters in London and in the relevant EBRD Resident Office a minimum of 120 calendar days prior to Board consideration for public sector projects.

### 3 PREVIOUS STAKEHOLDER ENGAGEMENT

Stakeholder engagement activities conducted to date by Eko-Sep or the authorities involved public hearings held in line with national spatial planning and permitting requirements.

#### **Public consultations in line with environmental permitting requirements**

After the local Environmental Impact Assessment (EIA) study was developed, a public hearing was organised on 14 April 2015 in Živinice by the Federal Ministry of Environment and Tourism (FMET). Prior to the hearing, the EIA was publicly disclosed on the FMET website on 26 March 2015, as well as made available in printed copies at the premises of FMET in Sarajevo. The invitation to the public hearing was announced in the local newspapers *Dnevni Avaz* on 30 March 2015 and the FMET website<sup>9</sup>. The EIA was also directly sent to the competent authorities and the NGO Centre for Ecology and Energy as one of the most active NGOs in Tuzla region. The public hearing was attended by 23 participants. Even though attendees raised certain issues, all voiced their support for the Project. After the hearing, the attendees were provided with 15 days for submission of written suggestions, but no written comments were received.

#### **Public consultations in line with spatial planning requirements**

During the adoption of spatial planning documents, in particular the *Draft Spatial Plan 2008-2028 of FBiH*, the *Spatial Plan of Tuzla Canton 2005-2025* and the *Spatial Plan of the Municipality of Živinice 2012-2032*, public consultations were provided through the organisation of public hearings, in line with the local legislation. No comments with regard to the planned RSL location were received during the public hearings for these spatial plans.

#### **Public consultations in line with construction permitting requirements**

In the process of issuing the Construction Permit, the Federal Ministry of Physical Planning was legally required to provide public access to the Main Design for the RSL. In January 2017, the Ministry publicised an invitation in the daily newspaper "*Oslobođenje*" and the bulletin board of the Ministry. However, no members of the public requested access to the Main Design, as stated in the issued Construction Permit.

#### **Public consultations during the development of the Waste Management Plan (WMP) of Canton Tuzla**

During the process of developing the Tuzla Canton WMP, a public hearing was held in December 2014 in Tuzla. No comments with regard to the planned RSL location were received during the public hearing.

#### **Consultation meeting in IDP Settlement "Ježevac" in 2018**

In addition to the above mentioned legally required public consultations, a consultation meeting with the local population living in the internally displaced persons (IDP) settlement "Ježevac" was organised by Eko-Sep during the development of this SEP. The meeting was announced through a notification posted at several visible places

<sup>9</sup><http://www.fmoit.gov.ba/ba/clanak/1137/javna-rasprava-regionalna-sanitarna-deponija-komunalnog-otpada-u-ivinicama>

within the “Ježevac” settlement prior to the meeting. The meeting was held on 6 April 2018 and was attended by 27 participants. Key topics discussed during this meeting were related to the water sources used by the inhabitants, use of land plots and roads, familiarity with the RSL project and concerns regarding perceived Project risks and impacts.

## 4 STAKEHOLDER ENGAGEMENT PROGRAM

### 4.1 Introduction

In order to adequately respond to the needs of different groups, communication and information channels have been designed for all identified stakeholders in accordance with their needs. Eko-Sep recognises that meaningful and timely engagement with stakeholders can enable the success of the Project. The engagement process will be used to obtain comments and suggestions for the development of the Project, which may enhance the Project design and lead to extended local benefits.

Project stakeholders have been identified in order to address the different consultation requirements. Stakeholders include persons or groups that are:

- directly and/or indirectly affected by the Project;
- have certain interests in the Project and its activities;
- have the ability to affect the Project itself and its final outcome.

Any stakeholders that are not identified at this stage of the Project may directly contact Eko-Sep to make themselves and their needs known to facilitate the effective implementation of the SEP.

### 4.2 Responsibility for SEP Implementation

A 3-member Project Team has been set up to manage Eko-Sep operations and the Project, each member representing one of the involved Municipalities. A responsible person has been appointed for the implementation of this SEP during the entire Project cycle, and in charge of communicating with the communities (see contact information in Chapter 5 of this SEP).

All contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of SEP (see chapter Chapter 5 for more details). The grievance mechanism requirements will be laid out in the tender documentation and contracts signed with the contractors.

### 4.3 Planned Information and Communication Arrangements

Eko-SEP will carry out public consultations and information dissemination that will reflect main issues of relevance to the Project.

#### Documents and information to be disclosed

Eko-SEP intends to disclose the following Project disclosure package:

- This **Stakeholder Engagement Plan (SEP)**;
- **Local EIA study** developed in 2015, based on which the Environmental Permit was by the Federal Ministry of Environment and Tourism for this Project;
- **Project Grievance Form** (see [Appendix A](#)) and **Public Grievance Leaflet** (see [Appendix B](#));
- **Non-technical Summary** of the environmental and social assessment of the Project;
- **Environmental and Social Action Plan (ESAP)**.

The disclosure package will be publicly available in local language (as well as English where available) immediately upon its availability, on the website of the three involved Municipalities, as follows:

- Municipality of Živinice ([www.opcinazivinice.ba](http://www.opcinazivinice.ba))
- Municipality of Banovići ([www.banovici.gov.ba](http://www.banovici.gov.ba))
- Municipality of Kladanj ([www.kladanj.ba](http://www.kladanj.ba)).

The documents will remain disclosed on the website of the three Municipalities and EBRD during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors, and will remain publicly available throughout the life of the Project.

In addition, hard copies of the documents will be available at the following locations:

1. Eko-Sep office in Živinice, Maršala Tita bb, 75270 Živinice
2. Municipality of Živinice, Alije Izetbegovića 28, 75270 Živinice
3. Municipality of Banovići, Alije Dostovića 1, 75290 Banovići
4. Municipality of Kladanj, Kladanjske brigade 2, 75280 Kladanj
5. EBRD office in Sarajevo, Fra Anđela Zvizdovića 1, 71000 Sarajevo

Two weeks prior to the start of RSL construction works, the extent, timing and duration of planned works and any expected disruptions and inconveniences will be publicly disclosed through the website of the Municipality and the central bulletin board in the "Ježevac" settlement.

After the completion of construction works and during the period of obtaining the Use Permit for the RSL facility, Eko-Sep will inform the public in advance about the expected start of RSL operation and the planned job vacancies in order to allow the local population to prepare for possible employment opportunities, by posting information on the bulletin boards and websites of the three involved Municipalities.

#### Planned meetings

Eko-Sep will schedule and hold at least one public consultation meeting during Project preparation (but prior to start of construction works). The timetable and the venue designated for the meeting will be precisely defined by Eko-Sep, and all stakeholders will be informed about the exact date, time and venue where the meeting will be held, at least 7 days in advance (but preferably 2 weeks), through disclosure through the websites of the three Municipalities, as well as local media (newspapers, online news portals).

All available Project information and documents will be disclosed to the public at least 2 weeks in advance of the meetings. If necessary, separate meetings will be held to ensure that the stakeholder engagement is gender responsive.

The meetings will be aimed at providing information to the public about the construction and operation of the planned RSL, in particular information on the expected increase in traffic volume in the "Ježevac" settlement and the planned routes of the trucks. Participants will be able to present their opinions and remarks with regard to the Project, as well as suggest possible solutions of the issues raised.

The conclusions of the meeting will be agreed during the meeting and recorded. All justified comments and proposals will be considered and appropriately addressed. The Project Team will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

In addition, individual consultation meetings for specific issues may be organised at the initiative of Eko-Sep, the Municipalities or by any identified stakeholder groups/individuals such as the "Ježevac" settlement.

A summary of all stakeholder engagement and disclosure requirements listed above is provided in Table 2 below.

Table 2: Summary of Stakeholder Engagement and Disclosure Requirements

Activity	Timing/further detail	Responsibility
<p>1 Ensure that the following Project documents are publicised on the websites of the Municipality of Živinice, Banovići and Kladanj:</p> <ul style="list-style-type: none"> <li>• This SEP</li> <li>• Local Environmental Impact Assessment study</li> <li>• Project Grievance Form and Public Grievance Leaflet</li> <li>• Non-technical Summary of the environmental and social assessment of the Project</li> <li>• Environmental and Social Action Plan</li> </ul> <p>Print and keep hard copies of documents at premises of Eko-Sep and the three Municipalities for disclosure</p>	<p>All available Project information and documents will be disclosed to the public as soon as available, but at least 2 weeks in advance prior to the public meeting</p> <p>The disclosure package will be publicly disclosed on the website of the three Municipalities and EBRD during a period of 120 calendar days prior to consideration of the Project by the EBRD's Board of Directors, and will remain publicly available throughout the life of the Project.</p>	Project team
<p>2 Organise at least one public consultation meeting during Project preparation (but prior to start of construction works)</p> <p>Encourage written proposals and comments</p> <p>Provide timely access to the documents before any meeting (at least 2 weeks)</p>	Stakeholders will be informed about the exact date, time and venue where a meeting will be held, at least seven days in advance (but preferably 14 days), through disclosure through the websites of the three Municipalities, as well as local media	Project team
3 Organise individual consultation meetings	As needed or requested Eko-Sep, the Municipalities or by any identified stakeholder groups/individuals such as the "Ježevac" settlement	Project team
4 Document all opinions, remarks and possible solutions with regards to the Project raised by stakeholders during consultation meetings, and address appropriately	Ongoing	Project team
5 Publicise information about the extent, timing and duration of planned construction works, and any expected disruptions and inconveniences via the website of the three Municipalities and the central bulletin board in the "Ježevac" settlement	Two weeks prior to the start of RSL construction works	Project team and the Municipalities
6 Inform the public in advance about the expected start of RSL operation and the planned job vacancies in order to allow the local population to prepare for possible employment opportunities, by posting information on the bulletin boards and websites of the three involved Municipalities.	After the completion of construction works and during the period of obtaining the Use Permit for the RSL facility	Project team

#### 4.4 Identified Stakeholders and Specific Communication Requirements

A list of identified stakeholders and specific communication requirements are provided in Table 3 below.

Suggestions for improvement of proposed communication methods are welcomed, and can be sent to the contact person whose details are provided in Chapter 5 this SEP.

Table 3: Stakeholder Analysis and Communication Requirements

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
<p><b>Local residents in the vicinity of the planned RSL facility</b>                      The “Ježevac” village is an internally displaced persons (IDP) settlement located at an air distance of 500 m from the planned RSL, with 59 small houses, of which 42 houses are occupied by a total of 64 families (not all of the houses are inhabited).</p>	<p>For transport of waste to the landfill, the 1 km long local paved road will be used, which is located next to the Ježevac settlement. It connects the regional road R-469 Ribnica-Banovići-Živinice with the entrance into the “Ježevac” settlement.</p> <p>The village will experience disturbances related to increased noise and dust due to increased traffic (during both construction and operation).</p>	<p>Providing timely information on risks and disturbances associated with the construction and operation period, related to disturbances listed under ‘specific issues’.</p>	<ul style="list-style-type: none"> <li>Public consultation meeting, and individual meetings as necessary</li> <li>Publicising information on the extent, timing and duration of planned works and any expected disruptions and inconveniences on the central bulletin board in the “Ježevac” settlement two weeks prior to the start of RSL construction works</li> </ul>
<p><b>Relevant government authorities, ministries and public institutions, including:</b></p> <ul style="list-style-type: none"> <li>Municipalities of Živinice, Banovići and Kladanj</li> <li>Ministry of Spatial Planning and Environmental Protection of Tuzla Canton</li> <li>Ministry of Agriculture, Water Management and Forestry of Tuzla Canton</li> <li>Federal Ministry of Environment and Tourism</li> <li>Federal Ministry of Agriculture, Water Management and Forestry</li> <li>Federal Ministry of Physical Planning</li> <li>Sava River Watershed Agency</li> <li>Tuzla Canton and FBiH levels inspection authorities</li> </ul>	<p>Issuing permits, consents and opinions in accordance with local legislation, control of compliance with local legislation, management of the PRTR register</p>	<p>Consultations with relevant government authorities concerning Project activities in the framework of permitting procedures</p> <p>Reporting based on national legislation requirements</p>	<ul style="list-style-type: none"> <li>As defined by national legislation</li> </ul>
<p><b>Interested non-governmental organisations (NGOs)</b></p> <p>No NGOs have demonstrated a specific interest in this Project to date, but all shall be provided with opportunities to voice</p>	<p><i>Note:</i> Any organisations interested in the Project can send their contact details to be included in a list of interested organisations in</p>	<p>Providing timely information, communication and consultations</p>	<ul style="list-style-type: none"> <li>Public consultation meetings, and individual consultation meetings as necessary</li> </ul>

Identified stakeholder	Specific issues or interests	Communication and engagement objective	Communication and engagement methods
their opinions or concerns throughout Project preparation and implementation.	this SEP and notified directly about Project events.		
Employees of Eko-Sep	Stakeholders of high significance for the Project’s success who are directly or indirectly engaged in Project planning and implementation	Providing timely information about the planned Project activities	<ul style="list-style-type: none"> <li>• Eko-Sep’s internal bulletin board</li> <li>• Trainings as necessary</li> </ul>
Contractors or subcontractors for construction, monitoring and supervision of works, and their employees		Provision of Project code of conduct and work safety and health regulations, environmental protection requirements	<ul style="list-style-type: none"> <li>• Information through tender procedure and contracts</li> <li>• Communication via supervising engineers</li> <li>• Toolbox talks at construction sites on relevant occupational health and safety topics</li> <li>• Monthly reports on progress of works to be submitted by contractors during construction works</li> <li>• Trainings as necessary</li> </ul>

## 5 GRIEVANCE MECHANISM

Eko-Sep will establish a Grievance Registry, and will inform all stakeholders of the grievance mechanism by communicating the availability of this registry, its function, the contact persons and the procedures for submitting a complaint in the affected areas. The Project Grievance Form ([Appendix A](#)) and the Public Grievance Leaflet ([Appendix B](#)) will be disclosed on the websites of the Municipality of Živinice Banovići and Kladanj, and also be made available in printed copies in the premises of the three Municipalities and Eko-Sep.

Any comments or concerns can be brought to the attention of Eko-Sep verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post, fax or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

The grievance form may also be submitted directly to the Contractor for construction works, which will forward any such received grievances/comments to Eko-Sep without delay to allow Eko-Sep to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). The Contractor is obliged to hand out the Project Grievance Form, explain the grievance mechanism to the concerned citizen(s) and forward the filled-in Grievance Form to Eko-Sep. The Public Grievance Leaflet concerning the grievance mechanism will be available at the construction site at all times, whether the construction site is closed or open. The leaflet will be plasticised and hung on the construction site information board to be publicly available at all times.

All grievances will be recorded by Eko-Sep in the Grievance Registry and assigned a number, and acknowledged within seven calendar days (the flowchart for processing grievances is enclosed in [Appendix C](#)). The Registry will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the registry with the following information:

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

If the grievance/complaint is vague and not clear enough, Eko-Sep will assist and provide counsel in formulating/redrafting the submission, in order for the grievance/complaint to become clear, for purposes of an informed decision by Eko-Sep, in the best interests of persons affected by the Project.

Eko-Sep will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If Eko-Sep is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 25 calendar days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

If Eko-Sep is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/ justification on why the issue was not addressed. The response will also contain an explanation on how the person/ organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

At all times, complainants may seek other legal remedies in accordance with the legal framework of FBiH, including formal judicial appeal.

A separate grievance mechanism is available for workers.

*Contact information for enquiries and grievances:*

Attention: Samir Salihović  
Živinice Regional Solid Waste Project  
Address: Maršala Tita bb, 75270 Živinice  
Tel: +387 035 775 402  
E-mail: samir.salihovic2010@gmail.com

## 6 MONITORING AND REPORTING

The results of the stakeholder engagement process will be included in Monitoring Reports to be prepared by the Project Team. The first report will be produced three months after the beginning of the Project, and will continue on a quarterly basis during construction works and on an annual basis during operation. The reports will include the following information:

- Place and time of held consultation meetings and other types of engagement activities, with information on the number of participants;
- Issues and concerns raised during consultation meetings and information on how the issues raised were taken into consideration by the Project Team;
- Number and types of grievances raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism.

In addition, the Project Team will submit Annual Environmental and Social Reports to EBRD summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

The Project Team will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD.



A. Project Grievance Form

<b>Reference Number</b>	
<b>Full name (optional)</b>  <input type="checkbox"/> I wish to raise my grievance anonymously. <input type="checkbox"/> I request not to disclose my identity without my consent.	
<b>Contact information</b>  Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> <b>By Post: Please provide mailing address:</b> _____ _____ _____ <input type="checkbox"/> <b>By telephone:</b> _____ <input type="checkbox"/> <b>By E-mail</b>
<b>Preferred language of communication</b>	<input type="checkbox"/> <b>Bosnian / Serbian / Croatian</b> <input type="checkbox"/> <b>English (if possible)</b>
<b>Description of Incident for Grievance</b>	
	What happened? Where did it happen? Who did it happen to? What is the result of the problem?      
<b>Date of Incident / Grievance</b>	
	<input type="checkbox"/> <b>One-time incident/grievance (date _____)</b> <input type="checkbox"/> <b>Happened more than once (how many times? _____)</b> <input type="checkbox"/> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen?</b>     	

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please return this form to:  
 Attention: Samir Salihović  
 Živinice Regional Solid Waste Project  
 Address: Maršala Tita bb, 75270 Živinice  
 Tel: +387 035 775 402  
 E-mail: samir.salihovic2010@gmail.com

## B. Suggested Text for Public Grievance Leaflet

Eko-Sep is striving to ensure that the Živinice Regional Solid Waste Project will not result in adverse impacts for those living near the Project sites or for other potentially affected stakeholders. However, should there be any issues, we would like to hear about any concerns or grievances that you may have in relation to Project activities.

### What kind of grievance can I lodge?

Anyone can lodge a grievance if they feel that Project activities are negatively affecting them, their community or their local environment. Examples of grievances could include, but are not limited to:

- Increased noise, access issues or other nuisances during construction works or operation;
- Concerns regarding community health and safety, such as increased heavy traffic on local roads, local road damage or inadequate management of waste during construction works;
- Concerns about the environment;
- Practices that endanger the health, safety and security of employees working on the Project;
- Inadequate implementation of the Project’s Stakeholder Engagement Plan by Eko-Sep.

### How can I submit a grievance?

Anyone can submit a grievance to Eko-Sep (contact information given below) or the Contractor without any costs incurred to the complainant, in the following ways:

- a. verbally (in person or by telephone)
- b. in writing by filling in the attached Project Grievance Form or in other form if preferred, and sending it by personal delivery, post, fax or e-mail

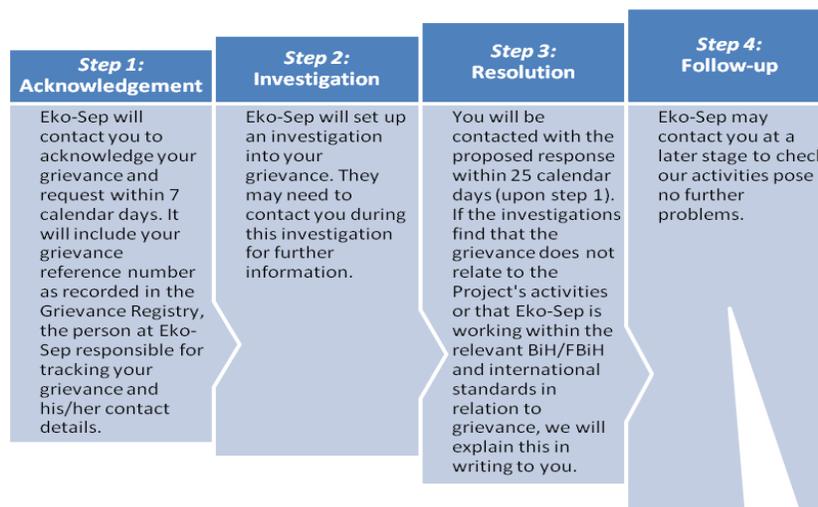
**Contact information:**

Attention: Samir Salihović  
 Živinice Regional Solid Waste Project  
 Address: Maršala Tita bb, 75270 Živinice  
 Tel: +387 035 775 402  
 E-mail: samir.salihovic2010@gmail.com

Grievances may also be submitted anonymously. In addition, if you would like your grievance to remain confidential, Eko-Sep will ensure that your name and contact details are not disclosed without your consent and only the Eko-Sep team directly working on the investigation of your grievance will be aware of them. If it is not possible for the team to fully investigate the grievance without revealing your identity or the contents of your grievance, you will be informed.

### How will Eko-Sep deal with my grievance?

Eko-Sep will go through the following steps to deal with your grievance:



### C. Flowchart for Processing Grievances

