

# STAKEHOLDER ENGAGEMENT PLAN

## Construction of Regional Waste Management Centre Kalenic



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## Abbreviation list

AFD	French Development Agency
CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
E&S	Environmental & Social
EU	European Union
KPI	Key Performance Requirements
MoEP	Ministry of Environmental Protection
MoF	Ministry of Finance
MRF	Material Recovery Facility
NGO	Non-Governmental Organisation
NWMS	National Waste Management Strategy
PAP	Project Affected Person
PIU	Project Implementation Unit
PR	Performance Requirement
RS	Republic of Serbia
RWMS	Regional Waste Management System
SEP	Stakeholder Engagement Plan

# 1 Introduction and Project Description

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The European Bank for Reconstruction and Development (EBRD) and the French Development Agency (AFD) are each considering providing a sovereign loan to the Republic of Serbia to finance critical improvements in the solid waste management system across several secondary cities in the country.

The program aims to support the development of an integrated and modern solid waste management system in Serbia, via:

- The establishment of regional waste management systems (RWMS) articulated around a regional waste management center covering several municipalities (particularly for the sanitary landfill), a solution identified as the most economically viable in the National Waste Management Strategy (NWMS);
- The establishment of primary sorting / recycling systems;
- Treatment and recovery of biodegradable waste;
- Infrastructure necessary for collection (waste bins, containers, vehicles and transfer stations).

The borrower for the Programme will be the Republic of Serbia (RS), represented by its Ministry of Finance (MoF) as a signatory to the AFD and EBRD's Loan agreements. The MoF will then allocate the funding to the Ministry of Environmental Protection who will establish the PIU and be the project owner of the Programme.

The Project aims at provision of modern solid waste infrastructure compliant with EU standards, contribute to higher service levels, and address pressing environmental challenges in the solid waste sector in line with the National Waste Management Strategy.

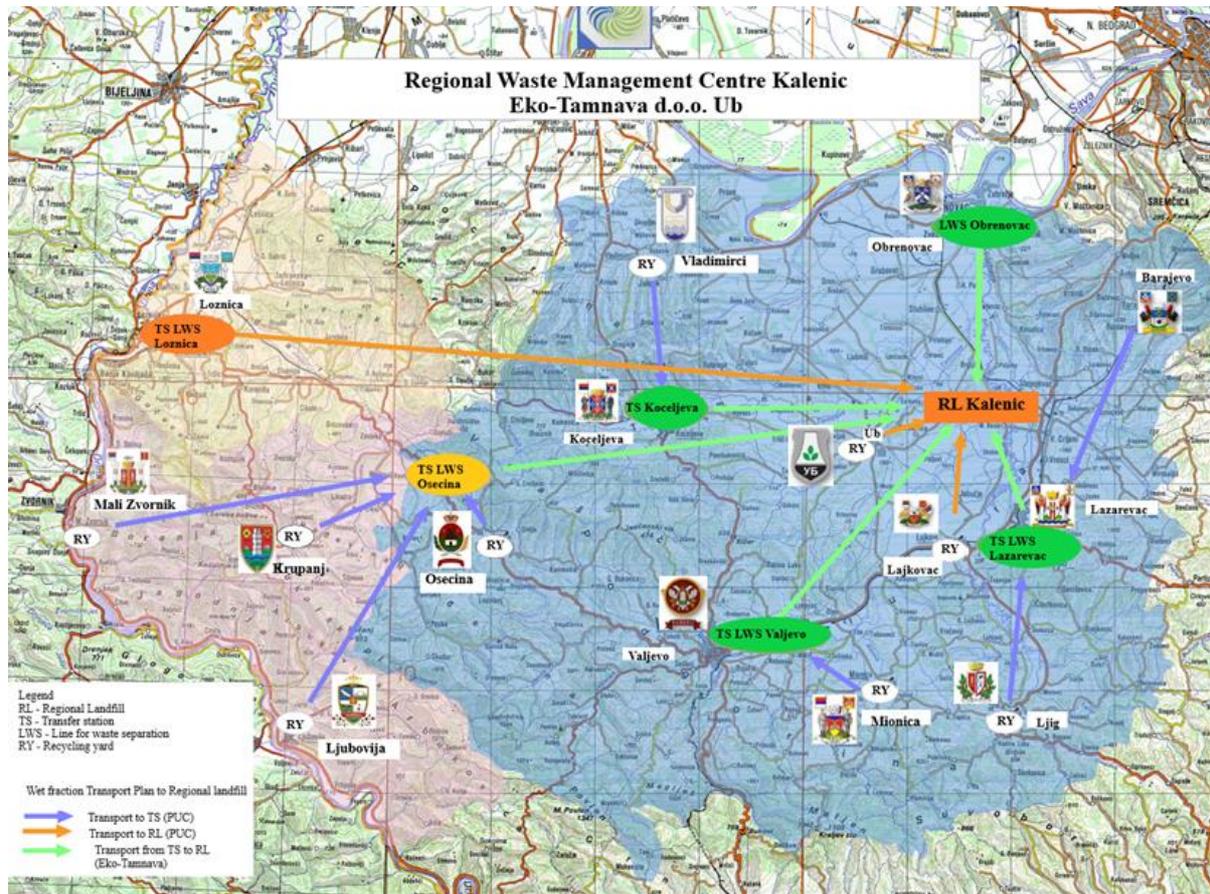
A list of eight sub-projects agreed with the MoEP has been submitted to the Banks (for an overall amount estimated at around MEUR 95, of which one is RWMS Kolubara ("Kalenic")). Kalenic consists of the following components (estimated cost: EUR 26 million):

- construction of a regional waste management center including a sanitary landfill according to EU standards;
- a material recovery facility (MRF) and a composting facility;
- funding for 4 transport trucks for waste between transfer stations and the regional center;
- establishment of a primary and secondary waste sorting system including domestic composting throughout the region.

The location of the future municipal (non-hazardous) waste is located near the four borders of the municipalities of Ub, Lajkovac, Lazarevac and Obrenovac, in the valley of the river Kladnica and in the immediate vicinity of the location of the thermal power plant Kolubara B (under construction).

The micro-location is in one of the excavation fields of the Kolubara lignite basin on the site of the former surface mine 'Tamanava Zapadno polje' of the Kolubara mining basin. The intended area is about 70 ha, of which about 50 ha is located within cadastral municipality Kalenić - municipality of Ub, and about 20 ha within cadastral municipality Mali Borak - municipality of Lajkovac.

Figure 1 Regional Waste Management Centre Kalenic



The Project is categorised “A” in accordance with the EBRD Environmental and Social Policy (ESP) (2019).

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement which will assist Eko-Tamnava d.o.o. to develop and maintain a constructive relationship with their stakeholders over time. The engagement procedures shall identify all stakeholders, be inclusive (not allow barriers of any kind to prevent from participation, like gender, ethnicity, age, etc.) and take into account the needs of particularly vulnerable groups. The document also includes a grievance mechanism for stakeholders to raise any concerns about the Project.

The responsibility for implementation of the Project and this SEP lies with the Eko-Tamnava d.o.o. Eko-Tamnava d.o.o. will closely liaison with other relevant institutions, governmental bodies, local governments, and affected communities and individuals as well as with other stakeholders to engage with them and ensure full disclosure of information and documents as defined by this SEP.

Stakeholder engagement and grievances management related to construction activities will be managed by the Contractors’ nominated Grievance officer and overseen by the Supervision Consultant to be appointed to act as the Engineer in accordance with the Contract for Construction works. The Contractors’ responsibilities shall be clearly delineated and specified in the respective works contracts. Prior to construction, the public and local

community will be informed, through Eko-Tamnava d.o.o. and relevant municipalities websites, about the Contractor's contact information and Grievance officer.

The SEP will be periodically reviewed and updated by Eko-Tamnava d.o.o., as important Project information becomes available.

## 2 Objectives of the SEP

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The main objectives of stakeholder engagements are to:

- Ensure that adequate and timely information is provided to persons affected or likely to be affected (both directly and indirectly) by the project (“affected parties”) or that may have an interest in the project (“other interested parties”) or that have influence over the Project. Provide to these groups such forums and opportunities to voice their concerns and opinions,
- Ensure that comments are received in a timely manner so that they can be taken into account during the decision-making process.
- Establish effective communication and cooperation facilitating community support in general, and
- Establish an effective grievance and mediation mechanisms with the main goal to intervene in disputes in order to resolve and close out and minimize the number of cases referred to judicial authorities.

This SEP describes the approach in engaging with stakeholders, to be maintained throughout the Project cycle i.e. for, pre-construction, construction activities and operation.

The table below identifies and summarizes the adopted phases of stakeholder engagement that guide this Project.

Table 1 Project Phases

<b>Phase</b>	<b>Status (Planned / Completed)</b>
Phase 1: Pre-construction Phase	Planned
Phase 2: Construction Phase	Planned
Phase 3: Operation	Planned

## 3 Regulatory Requirements for Stakeholder Engagement

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### 3.1 Legislation of the Republic of Serbia

Public disclosure and consultation procedures are organised under Serbian legislation in connection to the development and adoption of spatial and regulation plans for cities, municipalities, neighbourhoods. The most recent Serbian law which regulates these issues is the Law on Planning and Construction (Official Gazette of the RS No. 72/2009...9/2020).

There are several disclosure and consultation activities which must be undertaken before the adoption of a plan and they are:

- Informing the public through the media about details of disclosure of the draft plan/document (i.e. where the hard copy is available for review, the dates and time when it can be reviewed) and inviting citizens/organisations to submit comments and/or attend a public hearing. Citizens can request that their comments are responded to in writing;
- Organising a public hearing to present the draft plan/document (usually in the town hall or other appropriate local venue);
- Processing comments received from all stakeholders and revising the plan/document to reflect them, as well as preparing a report to justify why certain comments were not adopted;
- Submitting the revised plan/document and report to relevant authorities whose task is to determine whether the comments have been meaningfully considered and addressed.

National legislation also requires public participation to be ensured in connection to the development of strategic environmental impact assessments, regulated by the Law on Strategic Environmental Impact Assessment (Official Gazette of the RS No. 135/2004, 88/2010).

### 3.2 EBRD requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's Independent Project Accountability Mechanism (IPAM), as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

PR10 promotes the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management of environmental and social impacts and issues.

The overall objectives of the PR 10 are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, particularly with the directly affected communities,
- Promote improved environmental and social performance of clients through effective engagement with the project's stakeholders,
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the project's stakeholders,
- Ensure that grievances from the affected communities and other stakeholders are responded to and managed appropriately.

The goal of consultation is to ensure that adequate and timely information is provided to interested parties and to those potentially affected by Project and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns.

Stakeholder engagement will be conducted 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, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

The stakeholder engagement shall be such to incorporate the following elements:

- Stakeholder identification and analysis,
- Stakeholder engagement planning,
- Disclosure of information,
- Consultation and participation,
- Grievance mechanism and
- Ongoing reporting to relevant stakeholders.

Regular reports to interested stakeholders shall be provided on the environmental and social performance as a separate publication. These reports shall be available and accessible to the affected communities.

Resources for public information and engagement should focus on affected parties with a particular attention to those that may be differentially affected by the project because of their disadvantaged or vulnerable status.

The EBRD PR10 requires that engagement continues during project implementation, meaning throughout the project cycle, and that a grievance mechanism is established to receive and facilitate resolution of stakeholders' concerns and grievances.

### **3.3 Gaps Between National and EBRD Requirements**

The national framework in Republic of Serbia is broadly compatible with the EBRD requirements of public consultation and stakeholder engagement but there still remain gaps to be addressed. The national requirements stay at the level of procedural engagement and do not tackle in depth meaningful and empowered consultation. Furthermore, the requirements are scattered across various documents and laws without sublimation even at sector level. The requirement of an effective procedure or mechanism by which people can make comments or raise grievances beyond the formal administrative and judicial grievance forums

is also recognized as a shortcoming in the national framework comparing to the EBRD requirements.

Therefore, this SEP has taken into consideration all the requirements and has produced a plan that avoids duplication of processes, grievance mechanisms on one hand but on the other complies with the more stringent EBRD standards and requirements of stakeholder engagement.

## 4 Summary of Previous Stakeholder Engagement Activities

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### 4.1 Regular communication with stakeholders

Public relations of Eko-Tamnava d.o.o. is the responsibility of the Company Director and the president of the Assembly, who are in charge of both internal and external communication.

Information on the company's operations, relevant news and company contacts are displayed on the official website (<http://www.ekotamnava.rs/>). The website is still being built, and it is planned to contain segment "Eco Culture" which will present educational content on waste management and recycling.

The Company is organizing regular bi-annual Assembly meetings that are open to the public. Conclusions from the meetings are reported on the local TV stations. Minutes are prepared after every meeting and they are available to the public upon request.

Public relations are a regular item on the Assembly meetings' agenda. Eko-Tamnava representatives demonstrated good understanding of importance of adequate information dissemination and stakeholder engagement and on the Project

### 4.2 Consultation and Public Disclosure in Connection to the Project

There have been several announcements to the press issued by Eko-Tamnava d.o.o. in relation to the Project.

As envisaged by the local legislation, the public consultations were conducted prior to the adoption of spatial plans, general regulation plans and detailed regulation plans. The location of the regional waste management centre "Kalenic" is envisaged in the following documents:

- Regional Spatial Plan for the Area of Kolubara and Macva Administrative Districts (Official Gazette of RS, No. 31/10)
- General Regulation Plan for the Area of Thermal Power Plan Kolubara B (Official Gazette of the City of Belgrade, No. 29/06, Official Gazette of Municipality Ub, No. 1/07, Official Gazette of Municipality Lajkovac 6/06)
- Spatial Plan for Special Purpose Area of Kolubara Mining Basin with Strategic Impact Assessment (Official Gazette of the RS, No. 122/08)
- Spatial Plan for Municipality Ub (Official Gazette of Municipality Ub, No. 13/12)

The locations of transfer stations and recycling yards are defined in spatial and regulation plans of relevant cities and municipalities.

As defined by Law on Environmental Impact Assessment (Official Gazette of RS, No. 135/2004, 36/2009), during the adoption of Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic", public disclosure of documents and public consultations were organized on several occasions:

- **September 2019:** proposed scope and content for updated Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic" was disclosed

The interested public could have an insight into the proposed scope every working day from 11-14 h in the premises of the Ministry of Environmental Protection in Belgrade, st. Omladinskih brigada 1, room 428 and on the website [www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/](http://www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/). This was announced in the newspapers „Napred“ Valjevo on 26th September 2019 and the public had the opportunity to submit their comments within 15 days from the announcement.

- **October 2019:** Ministry for Environmental Protection disclosed Decision on the Scope for updating Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic"

The interested public could have an insight into the proposed scope every working day from 11-14 h in the premises of the Ministry of Environmental Protection in Belgrade, st. Omladinskih brigada 1, room 428 and on the website [www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/](http://www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/). This was announced in the newspapers „Napred“ Valjevo on 26th September 2019 and the public had the opportunity to submit their comments within 15 days from the announcement.

- **May 2020:** Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic" was disclosed

Insight into the subject Study could be performed in the premises of the Ministry of Environmental Protection in Belgrade, st. Omladinskih brigada 1, room 428 and on their website [www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/](http://www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/), as well as in the premises of Municipality Ub, for a period of 20 days from 28th May 2020. The public consultation meeting was organized on 25th June 2020 at 11h, at the premises of Municipality Ub. This was announced in the newspapers „Napred“ Valjevo.

Apart from the representatives of the competent ministry, local self-government and the representatives of the Eko-Tamnava d.o.o., there was no interested public and there were no comments and questions raised.

- **June 2020:** public consultations regarding Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic" were organized in the premises of Municipality Ub

Insight into the adopted Decision was possible in the premises of Ministry of Environmental Protection in Belgrade, st. Omladinskih brigada 1, room 428 and on their website [www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/](http://www.ekologija.gov.rs/obavestjenja/procena-uticana-na-zivotnu-sredinu/). This was announced in newspapers „Napred“ Valjevo on 23rd July 2020.

- **July 2020:** Ministry for Environmental protection issued Decision approving the revised Environmental Impact Assessment Study for the Project Regional Landfill for Municipal (Non-hazardous) waste "Kalenic"

According to the information received from Eko-Tamnava d.o.o., no comments were submitted on the EIA.

In December 2019, final presentation of the Regional Waste Management Plan with public consultations was organized in the Great Hall of the City Hall in Valjevo. The public presentation and discussion was attended by 25 participants: representatives of the Ministry of Environmental Protection, interested representatives of local governments, representatives of local environmental protection services, directors of PUCs and representatives of Traffic Institute CIP d.o.o. Belgrade and "SET" d.o.o. Sabac who prepared the documents.

There were no objections and comments made on the documents during the public presentation. The questions of the interested public that were posed during the presentation were all related to the implementation of the presented documents. Representative of the study processor and the authorities from the Regional Center for Waste Management "Eko-Tamnava" d.o.o. Ub adequately answered all questions. The public presentation and consultations ended at 1:00 p.m.

No consultations were organized with formal and informal waste picker engaged on the non-regulated landfills.

## 5 Identification of Stakeholders and Communication Methods

Stakeholder groups that may be affected by and/or are interested in the implementation of the project are presented below. The objective of stakeholder identification, which is closely connected to the identification of impacts, is to establish which individuals and organizations may be directly or indirectly, positively or negatively impacted by the project and to bring them forward to the first line of information.

The Stakeholder list can change in the course of the process of implementation. It shall therefore be regularly reviewed and updated throughout the project cycle. The risk associated with each stakeholder group can also be subject to changes and shall be reassessed from time to time. As a minimum, the Stakeholder list should be revised at the start of the construction phase and at the start of the operation phase.

Not all impacts target all stakeholders equally, as some can be either influenced by subjective internal or objective external factors. The Stakeholders have been classified into the following groups:

National Governmental Stakeholders – high interest, high influence, high power and the key high-level decision-making groups	<ul style="list-style-type: none"> <li>• The Government of Republic of Serbia</li> <li>• Ministry of Environmental Protection</li> </ul>
Regional and Local Government Stakeholders – high interest, high local influence, high local power and locally important decision-making group	<ul style="list-style-type: none"> <li>• Eko Tamnava d.o.o.</li> <li>• City of Valjevo</li> <li>• City of Loznica</li> <li>• Municipality Ljig</li> <li>• Municipality Ub</li> <li>• Municipality Krupanj</li> <li>• Municipality Barajevo</li> <li>• Municipality Obrenovac</li> <li>• Municipality Lazarevac</li> <li>• Municipality Mionica</li> <li>• Municipality Osecina</li> <li>• Municipality Mali Zvornik</li> <li>• Municipality Ljubovija</li> <li>• Municipality Vladimirci</li> <li>• Municipality Lajkovac</li> <li>• Municipality Koceljeva</li> </ul>

Affected Population, Enterprises and Public Service Facilities – high interest, low influence, low power, low to medium influence over the decision-making process	<ul style="list-style-type: none"> <li>• Formal and informal waste picker engaged on non-regulated landfills</li> <li>• Residents of the affected municipalities</li> <li>• Waste collection and disposal system users</li> </ul>
External Stakeholders affected by construction – medium to high interest, medium influence, but are influenced by internal subjective factors	<ul style="list-style-type: none"> <li>• Other Interested Parties – various interest and influence levels,</li> <li>• NGOs</li> <li>• Local Media</li> <li>• Prospective Contractor,</li> <li>• Prospective Supervision Engineer for supervision of construction works,</li> <li>• EBRD</li> </ul>
Vulnerable groups – high interest and higher risk of poverty, low interest, low power	<p>Potentially:</p> <ul style="list-style-type: none"> <li>• Women</li> <li>• Elderly/Pensioners</li> <li>• Persons with disabilities</li> <li>• Minority communities</li> <li>• Persons receiving income support</li> <li>• Illiterate persons</li> </ul>

## 6 Stakeholder Engagement Plan

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### 6.1 Overview of activities

Eko-Tamnava d.o.o. will publish a grievance form and contact details for submitting grievances, on their official website (<http://www.ekotamnava.rs/>).

In line with the construction timeline, the Eko-Tamnava d.o.o., with support from representatives of the affected municipalities, will organise meetings in local communities to present the planned construction works, safety risks (during construction and operation) and expected construction nuisances, as well as foreseen mitigation measures and the grievance mechanism. These meetings will also serve as platforms for potentially affected people to ask questions and provide suggestions for further mitigation measures.

Meetings will be organized with formal and informal waste pickers engaged on non-regulated landfills, to present them with the planned schedule for closing the landfills and the livelihood restoration measures. The waste pickers should be informed on the anticipated dates for closing of the landfills and their inability to continue with waste picking activities at least 30 days in advance.

Given the outbreak and spread of the COVID-19 virus in the Republic of Serbia, conventional methods of public consultations may not be possible. Taking into account the current situation in the country, as well as the measures to combat the pandemic imposed by

the Government of the Republic of Serbia, which are in force at the given time, public consultations will be organized in one of the following ways:

- public consultations in the premises of relevant cities and municipalities, with the application of prescribed measures
- public consultations in the open (locations to be defined as suitable), with the application of prescribed measures
- broadcast of the recorded presentation on local media channels and/or websites of Eko-Tamnava d.o.o. and relevant cities and municipalities; comments and questions to be collected via email.

The meetings will be announced through the local media, on the Eko-Tamnava d.o.o. and relevant municipalities' websites and as recommended by local communities (e.g. through letters, leaflets, announcements on bulletin boards, by phone). All documents related to stakeholder engagement will be delivered in Serbian language.

The contractor will secure the construction site prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place.

Eko-Tamnava d.o.o. will continue to inform the public through their website, the media and in other appropriate ways on all significant project achievements and issues (environmental, H&S and social).

Eko-Tamnava d.o.o. will maintain records of all stakeholder activities performed including collecting records of Contractor's activities.

A detailed Stakeholder Engagement Plan for each of the Project phases (Pre-Construction, Construction and Operation) is presented in Tables 2-4 below.

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

Tables Table 2 through Table 4 outline stakeholder engagement activities for all three Project phases. Detailed requirements for adequate recordkeeping are presented in Chapter 8.2.

Table 2 Stakeholder Engagement Plan for Pre-Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
1.	Notify stakeholders on the implementation Program	All	30 days after formal approval of the Project. One-off	Eko-Tamnava d.o.o.	Announcement on website of Eko-Tamnava d.o.o., at premises and main public places of the affected municipality. Mass media (local newspapers, TV channels, radio, social media)	Enquiries and comments via Eko-Tamnava d.o.o. website Response via official correspondence, e-mail.	Press clippings Notifications as published in the affected municipalities and websites Grievance log
2.	Preparation and disclosure of Land Acquisition and Resettlement Plan	Affected communities, Project affected persons (i.e. formal and informal waste pickers engaged on the non-regulated landfills, landowners, etc.)	Disclosure and full implementation - Prior to commencement of the construction works	Eko-Tamnava d.o.o.	Announcement on website of Eko-Tamnava d.o.o., at premises and main public places of the affected municipality. LARP available on the websites of Eko-Tamnava d.o.o. and affected municipalities Hard copies available in the premises of the affected municipalities Mass media (local newspapers, TV channels, radio, social media) Leaflets containing non-technical summary of the Project	Enquiries and comments via Eko-Tamnava d.o.o. website Response via official correspondence, e-mail. Grievance mechanism	Press clippings Notifications as published in the affected municipalities and websites Attendance sheets Photos Leaflets Grievance log
3.	Notify the stakeholders on closing of the non-regulated landfills	Formal and informal waste pickers	At least 30 days prior to closing of the	Eko-Tamnava d.o.o.	Notifications in the affected municipalities and in vicinity of non-regulated landfills Leaflets	Enquiries and comments via Eko-Tamnava d.o.o. website	Notifications as published in the affected municipalities Leaflet

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
			non-regulated landfills		As advised by waste picker during LARP preparation and disclosure meetings	Response via official correspondence, e-mail. Grievance mechanism	Grievance log
4.	Particular effort with regards to notifications identified vulnerable groups	Vulnerable groups/persons	As assigned under each respective item	Eko-Tamnava d.o.o.	In addition to communication tools described above, vulnerable groups will receive house visits and/ or invitation to individual or small group meetings as agreed with the specific group/ individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non- technical language will be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language by a knowledgeable person if needed	In addition to channels defined above, Communication will be made available through direct phone lines and follow up agreed visits/meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	As defined above
5.	Grievance Mechanism	All	30 days after formal approval of the Project	Eko-Tamnava d.o.o.	Public notice boards and official correspondence by authorities and organizations. Distribution of Public Grievance Forms on public notice boards in the affected local communities and on the local communities' websites, during consultation meetings. Eko-Tamnava d.o.o. website	Enquiries and comments via Eko-Tamnava d.o.o. designated channels of communication. Response via official correspondence	Notification of Grievance Mechanism disclosure as published in affected municipality and websites and other advertising areas

## 6.3 Construction

During construction the most important pointer is to notify local stakeholders of construction activities and changes to schedules. Aim for rapid response times in resolving grievances.

Table 3 Stakeholder Engagement Plan for the Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
6.	Disseminate information about anticipated construction activities to affected communities and keep stakeholders informed of any project or construction-related activities that might affect them	Affected communities, Project affected persons, Public.	At least starting from 30 days prior to construction.	Eko-Tamnava d.o.o., Contractor(s)	Eko-Tamnava d.o.o. website, official correspondence, mass media, local noticeboards and premises of municipalities, project leaflets Community Liaison Officer (CLO) of Contractor	Grievance mechanism Contractors liaison officer (CLO)	Notifications as published in affected municipalities and websites Press clippings Written correspondence with relevant authorities and organisations
7.	Keep stakeholders informed about local employment opportunities	Formal and informal waste pickers, affected communities, public and private sector enterprises affected by the Project footprint etc., relevant local/regional/national authorities, General public	After closing the contract for construction works during mobilisation period and later as needed	Contractor, Local Employment office	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers website Local Employments office	Via Contractors website Via Contractors CLO	Notifications as published in affected municipalities and websites
8.	Disclose information on project Environmental and	PAPs, General Public	Semi-annually	Contractor	Contractor's website	-	Notifications as published on website

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
	Social construction performance.						
9.	Particular efforts with regards to activities from 4 through 8	Vulnerable groups/ individuals	As assigned to under each respective item	Eko-Tamnava d.o.o. with assistance of external specialist as needed (sign language specialist, gender specialist etc.)	In addition to communication tools described in items above, vulnerable groups will receive house visits and / or invitation to individual or small group meetings as agreed with the specific group / individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non- technical language will be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language knowledgeable person if needed will be present for hearing impaired persons	In addition to opportunities listed in bullets above, communication will be made available through direct phone lines and follow up agreed visits / meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	As assigned to under each respective item

## 6.5 Operation

Table 4 Stakeholder Engagement Plan for the Operation Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
10.	Disseminate information about transition of responsibilities and liabilities from Contractor(s) to Eko-Tamnava d.o.o.	Affected communities, Project affected persons, General public.	At least starting from two months prior to termination of works	Contractor with Eko-Tamnava d.o.o.	Contractors grievance / liaison officer Eko-Tamnava d.o.o. website, official correspondence, mass media, local noticeboards and premises of municipalities.	Contractors grievance / liaison officer Eko-Tamnava d.o.o. website
11.	Keep stakeholders informed on any operation -related activities that might affect them (e.g. notify stakeholders changes in the fee amounts for wate collection and disposal)	Local /regional/ national authorities, General public	From commencement of operation phase and on going	Eko-Tamnava d.o.o.	Mass media. Eko-Tamnava d.o.o. and relevant municipality websites	As envisaged by national law

## 7 Public Grievance Mechanism

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Respecting the grievance panels and its authorities made available under the national legislation, a Project Specific Grievance Mechanism shall be designed for the Project. As previously mentioned, submitting grievances to Eko-Tamnava d.o.o. is enabled through multiple channels. Any person or organisation may send comments, complaints and/or requests for information in person or via telephone or email using the contact information provided on Eko-Tamnava d.o.o. website. The Company director and the president of the Assembly are charge for addressing all complaints and forwards the complaints submitted by the public.

Project-related grievance will be collected during the pre-construction phase, during the implementation of construction works and also during the operation phase.

The mechanism will allow that complaints are raised anonymously. Raising grievances will not incur any costs for the grievance holder. All grievances, whether they are received verbally or in writing, should be categorized and recorded in the Grievance Log Register. The Grievance Log register will have all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. Each grievance will be recorded in the register with the following information:

- name and contact details of the grievance holder, if the grievance is not raised anonymously,
- description of grievance,
- date of receipt / acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures) and how were they communicated to the grievance holder,
- date of resolution and closure
- provision of feedback to the complainant and their response (satisfied/dissatisfied),
- whether long-term management actions have been taken to avoid the recurrence of similar grievances in future, if applicable.

All information on the grievance holder will be treated with confidentiality.

The reception of grievance should be formally acknowledged through a personal meeting, phone call, email or letter as appropriate within 7 working days from submission, if the contract details of the grievance holder are provided. If the grievance is not well understood or if additional information is required, clarification will be sought from the complainant at this time. The person/organization that submitted the grievance should be provided with contact information of the person responsible for its resolution and the estimated time for completion. If any grievance cannot be addressed or if action is not required, a detailed explanation / justification will be provided to the complainant on why the issue was not addressed. The response will also contain an explanation on how the person / organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

All grievances will be responded to within 30 working days from submission. In case of delay, complainants will be notified about the reasons for the delay and the expected timing for when their grievance will be addressed. The proposed resolution should be confirmed with the complainant before implementation to minimise unnecessary/unwarranted actions. If

they agree with the approach required actions are implemented to deal with the issue. Completion of actions is recorded in the Grievance Log Register. The response is signed off by the appropriate manager. This includes either signing off the Grievance Log Register or confirming in official correspondence (which will then be filed with the grievance to indicate agreement and referenced in the register).

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

At all times, complainants are also able to seek legal remedies in accordance with local laws and regulations.

The implementation of the Stakeholder Engagement Plan is the overall responsibility of Eko-Tamnava d.o.o. Grievances in relation to construction activities will be addressed together with construction contractors. They will be required to operate the same system and address grievances in the same manner and according to the same standards as Eko-Tamnava d.o.o. The Contractor will have Community Liaison Officer (CLO) appointed as a focal point, to liaise with local communities and collect their grievances related to construction activities and grievance management. Grievance management will be incorporated in monthly reports to the Supervising Engineer, and further to Eko-Tamnava d.o.o. Residents of the affected communities will be informed about the CLO contact information before construction begins, through announcements in the premises of the local community offices and the media, where appropriate.

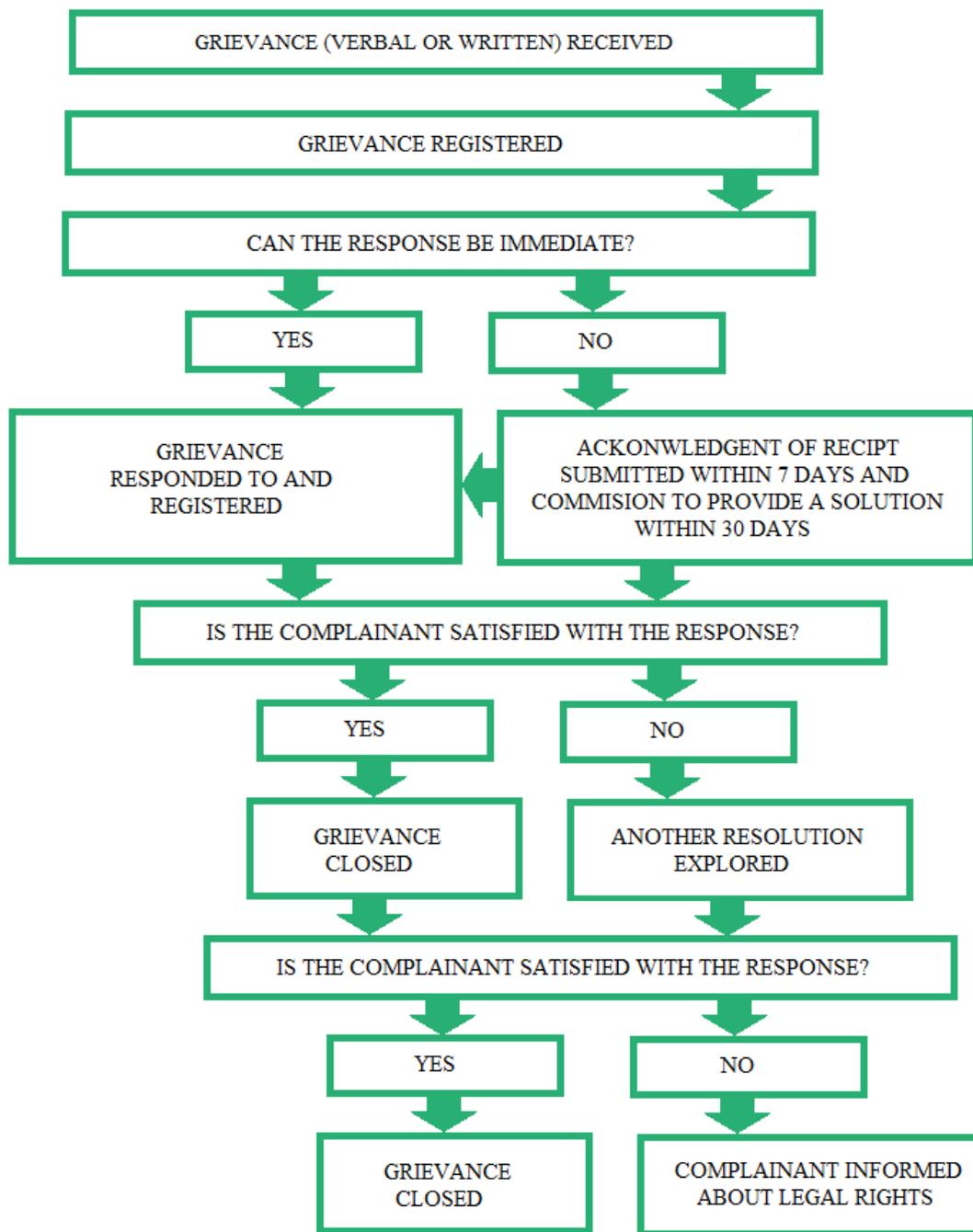


Figure 2 Grievance Resolving Process

## 8 Implementation of Stakeholder Engagement Activities

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### 8.1 Roles and Responsibilities

The implementation of the Stakeholder Engagement Plan is the overall responsibility of Eko-Tamnava d.o.o. Certain activities, as was described in Chapter 6, are expected to be implemented by the Contractor(s) through Contractor's Community Liaison Officer (CLO) responsible for disbursement of information to the community, grievance collection and management related to construction activities

### 8.2 Recordkeeping

All stakeholder activities have to be properly recorded.

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

### 8.3 Monitoring and Evaluation

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

- SEP is up to date and Project information is available for the public to comment.
- Actions listed in the Stakeholder Engagement and Information Disclosure Programme of the SEP are implemented as scheduled.
- The minutes of consultation meetings are recorded, and meetings logged in a register.
- Grievances are logged and tracked through to resolution within a timeframe of 30 working days from confirmation of receipt (noted in updated Grievance Log Register).
- Semi-annual Grievance Report to be prepared and made publicly available
- Contractors and subcontractor's contracts include clauses obliging them to adopt SEP requirements, as appropriate.
- Contractors progress reports include summary of the grievance mechanism (summary of new grievances recorded and update on the resolution of existing grievances)
- Annual reports on the implementation of the SEP and grievance process are made available as part of annual external reporting on the E&S performance of the Project which shall be made publicly available

## Appendix A

### **Public Grievance Form**

# A1 Public Grievance Form

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<b>Reference No:</b>	
<b>Full Name</b>	
<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>Description of Incident or 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 to resolve the problem?</b>	

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

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

**Please return this form to:**

Eko-Tamnava d.o.o. Ub

Address

Veljka Vlahovica br 8, 14210 Ub

Telephone

014/412 415

E-mail address:

[office@ekotamnava.rs](mailto:office@ekotamnava.rs)