

## Report on Early Consultations Conducted with the Local Community Regarding the Implementation of the Waste-to-Energy Plant Project in Prahovo



*July, 2024.*



# Table of Contents

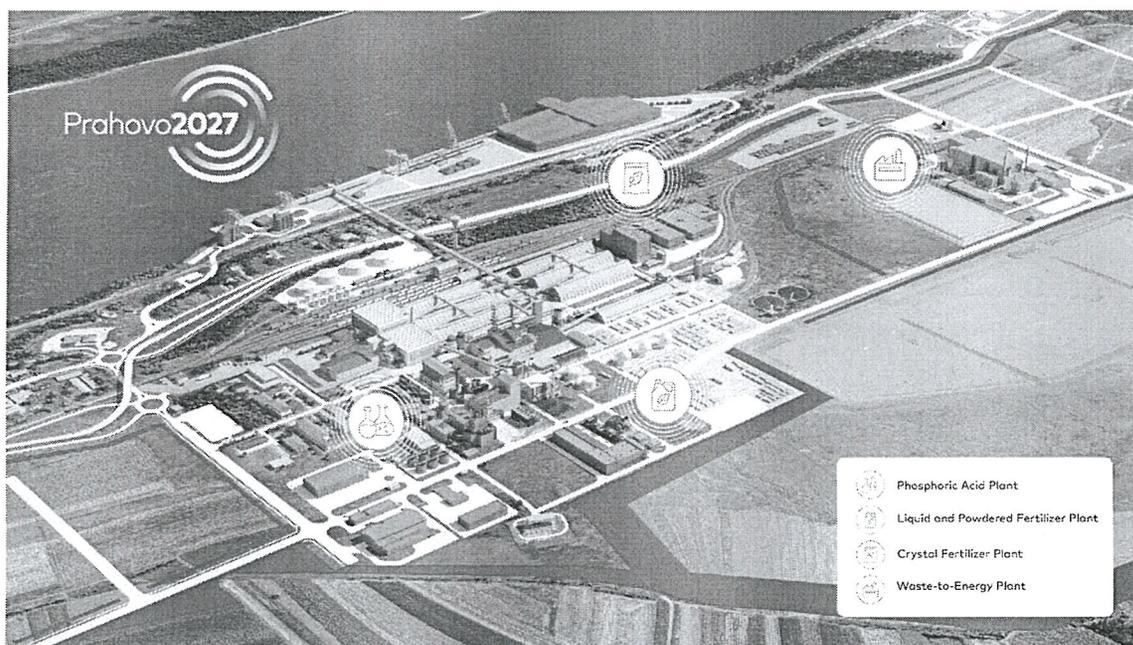
INTRODUCTION .....	1
I BASIC INFORMATION .....	3
About the Project .....	3
Justification of the Project .....	5
Strict Environmental Protection Requirements .....	7
Perception of Waste-to-Energy Plants .....	8
Purpose of Consultations .....	8
Legal Basis for Public Participation in the Environmental Impact Assessment Procedure .....	9
Voluntary Conduct of Early Consultations by the Investor .....	10
European Practice of Public Participation in the Consultation Process .....	11
II METHODOLOGY .....	13
Uniqueness and Participatory Nature .....	13
Methods and Channels of Consultation .....	14
Timeframe .....	14
Overview of Consultation Methods .....	15
Socio-demographic Analysis .....	15
Survey .....	16
Defining Zones of Potential Project Impact .....	16
Defining Potentially Vulnerable Groups and Stakeholders .....	17
Public Opinion Poll .....	17
Informative Meetings with Citizen .....	18
Public Meetings with Citizens .....	18
Study Trip and Education .....	20
Review of Communication Channels .....	21
Educational Materials .....	21
Digital Channels .....	22
Office for Cooperation with the Local Community .....	23
III CONSULTATION RESULTS .....	24
Analysis of Conducted Consultations .....	24
Conclusions of the Conducted Consultations .....	25
The Most Significant Measures Implemented in the Project .....	26
REPORT CONCLUSION .....	29



## INTRODUCTION

Elixir Group, together with its members Elixir Prahovo and Elixir Craft and its registered branch Eco Energy, initiated the process of conducting voluntary early consultations with the local community and presented the planned development projects within its significant investment cycle "Prahovo 2027" to the citizens of the Negotin municipality.

The subjects of the early consultations, which were designed and conducted over the past two years, included the construction projects of four greenfield investments within the chemical industry complex in Prahovo: a phosphoric acid plant, a liquid and powder fertilizer plant, a crystal fertilizer plant, and a Waste-to-Energy Plant in Prahovo.



*Rendering of the Planned Projects of the Investment Cycle Prahovo 2027 within the Chemical Industry Complex in Prahovo*

The first of the four planned projects, the construction of the plant for thermal treatment of waste in Prahovo (hereinafter referred to as the **Waste-to-Energy Plant in Prahovo**), was the focus of the early consultations. Together with the investor of this project, **Eco Energy**<sup>1</sup> (hereinafter referred to as the **Investor**), the Elixir Group team has thoroughly presented the Waste-to-Energy Plant project in Prahovo to the local communities of Prahovo, Radujevac, and Negotin and conducted a process of voluntary consultations in the earliest phase of this project.

This Report documents the process that was conducted, analyzes the methods and the collected opinions and views of the citizens, and concludes how the inputs from the local community were integrated into the design and implementation of the project. As such, the Report is an annex to the Environmental Impact Assessment Study for the construction of the waste-to-energy facility on cadastral plots no. 1420/1, 1420/4, 1491/1, 1541/1, 1541/2, 1552, 5824/1, 6513/1, 6513/2 in the cadastral municipality of Prahovo and the phased construction

---

<sup>1</sup> Eco Energy is a registered branch of the commercial entity Elixir Craft doo Šabac, which is a member company of the Elixir Group.

of a non-hazardous waste landfill on cadastral plots no. 2300/1, 1491/1, and 1541/1 in the cadastral municipality of Prahovo, within the chemical industry complex in Prahovo.

### **On the Early Consultation Process**

The creation of content and the implementation of consultations entailed a continuous and systematic process of information exchange and two-way communication with citizens using various methods and channels of communication. Through this two-way communication with the local community, the Investor ensured that the project implementation was not only accepted by the local community but also reflected its expectations and needs.

These well-designed consultations aimed to ensure a high level of transparency in the Investor's work, affirm the importance of participatory decision-making, and overall lay the foundation for the successful and sustainable implementation of the project, which aligns with the environmental, social, and economic views of the local community.

The early consultations were not a legal obligation for the Investor and were initiated significantly earlier than the legally defined public participation process in decision-making on the environmental impact assessment of the project, which is conducted by the Ministry of Environmental Protection through public inspection, project presentation, and public discussion.

The presentation of the Waste-to-Energy Plant project and the early consultation process were conducted using a specially designed methodology, motivated by the creation of sustainable and accepted industrial solutions in a local community encountering a project of this kind for the first time. Additionally, numerous examples of good practice served as a significant motivator, confirming the importance and usefulness of proactive engagement by the Investor in conducting voluntary early consultations with the local community.

### **On the Content of the Report**

This report documents the methodology, processes, and key outcomes of public consultations, showing how their inputs directly influenced the project's development. In addition to the introduction and conclusion, the report consists of three main parts: Basic Information, Methodology, and Consultation Results.

The first part of the report provides **basic information** about the project and the Investor. This section also reviews the purpose and importance of consultations and the dual basis on which the consultations were founded. It explains in detail why the consultations were conducted and how they contribute to a better project implementation.

The second part of the report presents the **methodology** for public consultations in detail and explains how the principles of uniqueness and participatory nature were key for developing of the methodology. This section includes a detailed description of the methods and channels used for consultations and the timeframe within which the consultations were conducted. The review of consultation methods and communication channels provides a clear picture of how data was collected and how all relevant participants were included in the process.

The third part of the report is dedicated to the **analysis of the consultation results**. This section examines the outcomes of the communication and the conclusions drawn based on the analysis of the results. Furthermore, based on these conclusions, it demonstrates how the Investor, in collaboration with the citizens, has defined appropriate measures for each

conclusion reached. Key findings with an overview of further steps regarding consultations and project implementation are presented in the conclusion.

## I BASIC INFORMATION

### About the Project

Elixir Group, together with its members Elixir Prahovo and Elixir Craft and its registered branch **Eco Energy**, which is also the Investor of the project, made a strategic decision to invest in the Waste-to-Energy Plant project. This modern industrial facility is designed for the thermal treatment and energy utilization of waste, featuring a fully integrated technological cycle that includes a non-hazardous waste landfill for the disposal of stabilized and solidified residue from the thermal treatment process. The project will be realized within the existing chemical industry complex in Prahovo, in the municipality of Negotin. This strategic decision is motivated by the goal to accelerate decarbonisation and green transformation of operations by switching to waste as an alternative fuel, optimizing use of resources in a responsible and efficient manner, and ensuring long-term energy stability while contributing to environmental protection.

**The Waste-to-Energy Plant** in Prahovo will convert non-recyclable waste into locally available thermal energy, crucial for the production of phosphoric acid – a strategic product of Elixir Prahovo, which operates at the chemical industry complex in Prahovo. The capacity of the Waste-to-Energy Plant in Prahovo is 30 megawatts of thermal energy, necessary for producing 35 tons of low-pressure steam per hour. The plant will be built based on technology from the Austrian company TBU Stubenvoll GMBH, which has proven positive references and is regarded as a model for similar facilities across Europe. This technology involves the thermal treatment of waste in a bubbling fluidized bed.

As a fuel, the Waste-to-Energy Plant will use liquid and solid non-recyclable waste, including both hazardous and non-hazardous waste, sourced from industrial, commercial, and municipal origins. This encompasses a wide range of materials that cannot be reused or recycled in a traditional manner, making them ideal for thermal treatment and production of energy from waste. The maximum amount of waste that the Waste-to-Energy Plant in Prahovo will be able to process is up to 100,000 tons per year.

The Waste-to-Energy Plant project in Prahovo is aligned with the latest edition of the BREF document<sup>2</sup> regarding the application of the best available techniques for thermal treatment and energy utilization from waste, adopted by the European Commission at the end of 2019. Compliance of the Waste-to-Energy Plant in Prahovo with the BAT conclusions of the latest BREF document makes it one of the first waste-to-energy plants in Europe to operate fully in line with the latest BAT conclusions from the very start, while existing facilities in the EU have had a four-year deadline for alignment.

For the purpose of early consultations with the local community, an illustration of a simplified technological scheme was created, with key technological units of the Waste-to-Energy Plant project being detailed and explained during the meetings and public presentations held.

---

<sup>2</sup> Best Available Techniques (BAT) 2019 Reference Document for Waste Incineration. Available: [Best Available Techniques \(BAT\) Reference Document for Waste Incineration \(europa.eu\)](#)



## Justification of the Project

The justification for the construction of the Waste-to-Energy Plant in Prahovo is versatile, encompassing significant environmental, economic, and social benefits for both the Investor and the production processes of Elixir Group members, as well as for the local and broader community.

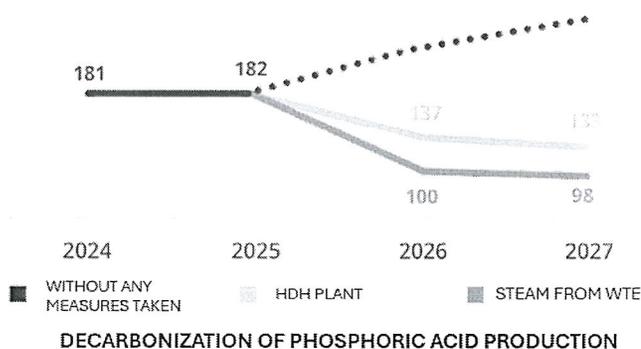
### 1. Resource Efficiency and Production Decarbonisation

The project contributes to enhancing resource efficiency and diversifying energy sources at the chemical industry complex in Prahovo, which is of exceptional importance for long-term energy security, production decarbonisation, optimization of natural resource use and reduction of harmful gas emissions in energy processes and the entire value chain.

By using waste as a fuel, this plant reduces the demand for fossil fuels such as coal, oil and natural gas, thereby conserving non-renewable natural resources and reducing the need for their exploitation. In this way, waste-to-energy plants are key promoters of a circular economy, where resources are reused instead of being discarded, thus extending their lifecycle.

Enhancing resource efficiency and decarbonizing production are the foundations of the entire investment cycle "Prahovo 2027". The new phosphoric acid plant is based on higher capacity and the application of HDH technology<sup>3</sup>, which requires less energy for converting phosphate ore and producing phosphoric acid, while the Waste-to-Energy Plant generates the energy needed for phosphoric acid production from alternative raw materials. This directly contributes to resource efficiency, energy savings, reducing dependency on non-renewable natural resources and reducing emissions of carbon dioxide (CO<sub>2</sub>) and other harmful gases produced during the exploitation and combustion of fossil fuels.

Specifically, the Waste-to-Energy Plant, in synergy with HDH technology for phosphoric acid production, will reduce CO<sub>2</sub> emissions per ton of this strategic product of Elixir Prahovo by up to three-quarters (¾) by 2027.

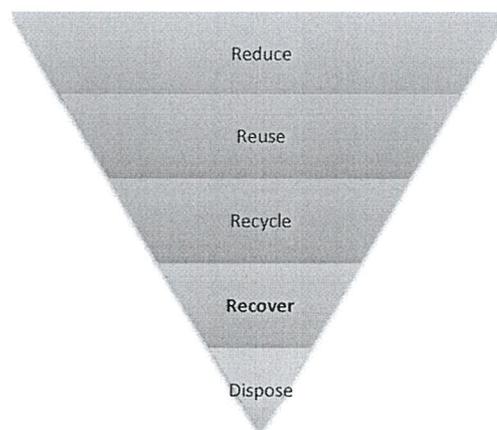


<sup>3</sup> HDH (hemihydrate-dihydrate) technology is a modern method used in the production of phosphoric acid, and it was developed to improve the efficiency and reduce the environmental impact of the production process.

## 2. Environmental Protection

In support of the contribution to environmental protection and the ecological benefits of waste-to-energy plants, it is noteworthy that using waste as a resource for energy production reduces the amount of waste disposed of in landfills, thereby significantly diminishing the harmful impact that landfill waste has on the environment.

Landfilling waste is considered the least desirable method of waste management according to the Waste Management Hierarchy, introduced by the EU Waste Framework Directive<sup>4</sup>, which has also been incorporated into the national legislation of Serbia.



*Waste management hierarchy*

Thermal treatment and energy recovery from non-recyclable waste serve as a direct alternative to landfilling. When waste that cannot be reused or recycled is processed to generate thermal or electrical energy, multiple benefits are achieved: the quantity and harm of waste are reduced, the need for landfilling waste is minimized, the exploitation and combustion of fossil fuels are decreased and locally available energy is obtained.

This approach reduces the impact of waste on all environmental media – water, air, soil and biodiversity, while simultaneously preventing further contamination caused by emissions during the decomposition of organic waste fractions, methane (CH<sub>4</sub>) emissions, a gas that, when released into the atmosphere, has a strong greenhouse effect and within landfill bodies, causes the formation of so-called "methane pockets" and the outbreak of uncontrolled fires.

Although the initial plan for the construction of the Waste-to-Energy Plant in Prahovo was focused on the incineration of industrial and commercial waste, the consultation process with the local community significantly influenced the design and implementation of the project in this segment, aiming to also address the issue of municipal waste management in the Negotin municipality.

## 3. Economic and Social Contributions

In addition to environmental benefits, the Waste-to-Energy Plant in Prahovo represents an economically sustainable solution that enables more efficient waste management, creates new value and new job opportunities. The Investor estimates that the Waste-to-Energy Plant in Prahovo will employ between 80 and 90 people, predominantly highly educated engineering staff, while indirectly employing over 300 people and contributing to the development of small and medium-sized enterprises – waste operators.

Sustainable investments also contribute to numerous social factors, including the development of people, knowledge, and new expertise. They generate potential for well-paid jobs, increased

<sup>4</sup> WFD, Directive 2008/98/EC Available: [Directive-2008/1-EN-EUR-Lex.europa.eu](http://Directive-2008/1-EN-EUR-Lex.europa.eu)

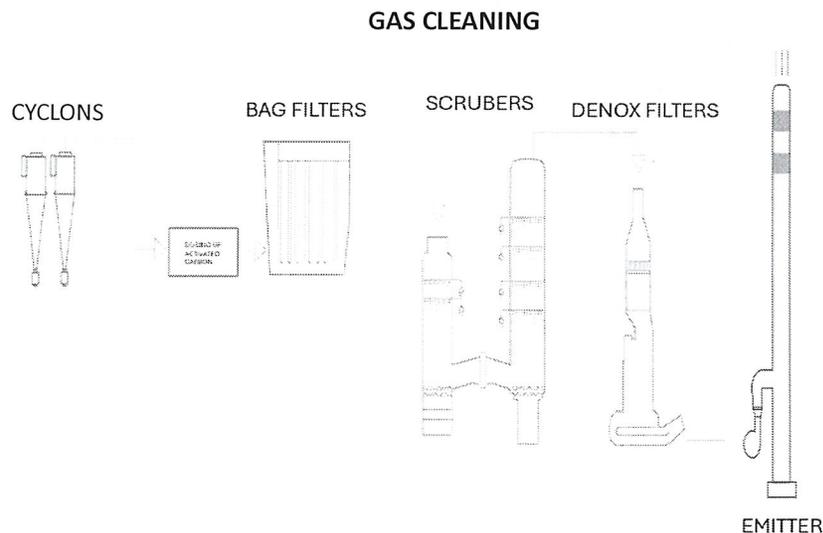
wages, and improved living standards, which are equally important aspects for the company, employees and the broader community.

### Strict Environmental Protection Requirements

It is crucial to emphasize that the process of thermal treatment and energy recovery from waste is currently the most strictly regulated industrial sector in Europe. The complex regulations applied to the design and operation of waste-to-energy plants are developed to ensure that these industrial facilities can meet the strictest environmental protection requirements by using available technologies and techniques. In the operation of waste-to-energy plants, more parameters are monitored than in any other industrial sector and the emission limit values are set significantly lower compared to other industries.

In accordance with the strictly defined regulations regarding operational and emission parameters for these facilities, the largest and most technically complex part of the Waste-to-Energy Plant in Prahovo is the system for multiple flue gas cleaning resulting from waste incineration. This system is designed based on a predefined range of the physical, chemical and energy characteristics of the waste used as fuel in the incineration and thermal treatment process.

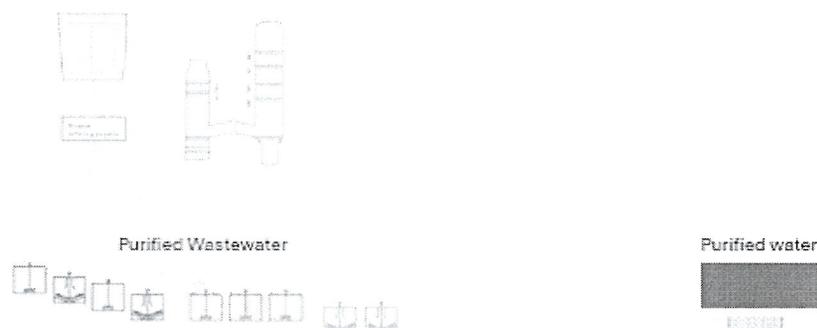
The flue gas cleaning in the Waste-to-Energy Plant in Prahovo involves a multi-stage process that includes the most advanced dry and wet cleaning systems, as well as a selective catalytic filter for nitrogen oxide reduction. This results in the quality of purified air that complies with both national and EU regulations.



*Waste-to-Energy Plant in Prahovo – Illustration of the Flue Gas Cleaning System*

The wastewater generated in the wet flue gas cleaning processes is treated using physico-chemical methods, including three-stage neutralization with heavy metal precipitation, flocculation, sedimentation and filtration. This treatment ensures that the quality of the purified water complies with both national and EU regulations.

## WASTEWATER PURIFICATION SYSTEM



*Waste-to-Energy Plant in Prahovo – Illustration of the Wastewater Purification System*

### Perception of Waste-to-Energy Plants

Although waste-to-energy plants first appeared in Europe at the end of the 19<sup>th</sup> century and now there are more than 500 such plants in 23 European countries according to Eurostat data, they are still not widely recognized among citizens in Serbia. The construction and trial operation of the "Vinča" facility for the energy utilization of municipal waste and landfill gas has introduced the concept of using waste as a resource into Serbia's public discourse, making it more known to the wider public. Despite this, challenges remain in adequately presenting and explaining the complexity of incineration technology, purification systems, and safety for human health and the environment to the general public. Negative perceptions of these facilities still exist among parts of the local public, often due to a lack of information, possible prejudices, or the consequences of poor European experiences from the past when the efficiency of flue gas cleaning technologies was not as developed and available as it is today.

Today, technological advancements and stricter environmental regulations have made waste-to-energy plants key elements of the circular economy in Europe. Modern incineration technologies enable efficient and safe waste management without negative impacts on the environment and air quality.

Recognizing these aspects as potential risks associated with public perception of these facilities, the Investor has proactively addressed them through information and consultations with the local community from the earliest phase of this project. Through transparent dialogue and education, the aim was to prevent misinformation and prejudices and to ensure community support for sustainable waste management solutions.

### Purpose of Consultations

The consultation process with citizens regarding the construction of the waste-to-energy plant in Prahovo aimed to inform the public about the project, ensure transparency in the project's

implementation and the Investor's work, and consider the community's opinions and views in the project.

#### 1) Informing the Public

Starting from the fact that the technology and benefits of waste-to-energy plants are not widely recognized among citizens, the Investor first approached thoroughly informing the local community about the functioning of these facilities, their purpose and benefits to the local community, as well as the way to manage these plants in a safe and sustainable way.

#### 2) Ensuring Transparency

By continuously providing relevant information about the project, the consultations enabled the Investor to reach a high level of transparency throughout the early project phase. This created a foundation for building trust and community support and a critical basis for reducing potential mistrust and resistance to the project, especially in areas of concerns about possible negative effects on the environment and the quality of life of the local community.

#### 3) Impact of Consultations on the Project

Active involvement of citizens through the consultation process was not limited to providing information and education but also included collecting their suggestions, questions and opinions. This approach allowed the project to be better adapted to the real needs and expectations of the local community and its citizens, who possess valuable knowledge about local specificities, needs and challenges, significantly contributing to the quality, success and sustainability of the project.

All goals are interconnected and support one another. Awareness enables the local community to understand the project, while transparency increases engagement and the community's willingness to participate. Finally, directly involving and respecting the views and needs of citizens raises their support and trust in the project. This enhances the project's quality and establishes a foundation for long-term cooperation and good neighbourly relations between the Investor and the community.

### Legal Basis for Public Participation in the Environmental Impact Assessment Procedure

The Constitution and laws of the Republic of Serbia clearly stipulate the importance of public participation in environmental protection issues, i.e. in decision-making procedures in this area, as well as the conditions and manner of exercising these rights.

First, the Constitution of the Republic of Serbia in Article 51 guarantees the general right of citizens to be accurately, completely and timely informed about matters of public importance and in Article 74, the right of individuals to a healthy environment and timely and complete information about the state of the environment. It also emphasizes the right of the public to participate in decision-making and the right to legal protection if rights related to the environment are endangered.

The Law on the Ratification of the Convention on Access to Information, Public Participation in Decision-Making, and Access to Justice in Environmental Matters<sup>5</sup> in Article 6, paragraph 2

---

<sup>5</sup> The Law on the Ratification of the Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Ratification of the Aarhus Convention) Official Gazette of RS- International Agreements, no. 38/2009

clearly defines the need to involve the public in planning and implementing projects with potential environmental impact already in the early stages of the procedure, while paragraph 3 of the same article prescribes that sufficient time must be provided for informing the public and preparing the public for effective participation in the decision-making process on environmental matters, ensuring transparency and accountability in decision-making processes.

The right to active public participation in processes that may impact the environment, ensuring transparency and the right to legal protection, is constituted in the Law on Environmental Protection<sup>6</sup>, the Law on Environmental Impact Assessment<sup>7</sup>, the Law on Strategic Environmental Impact Assessment<sup>8</sup> and others.

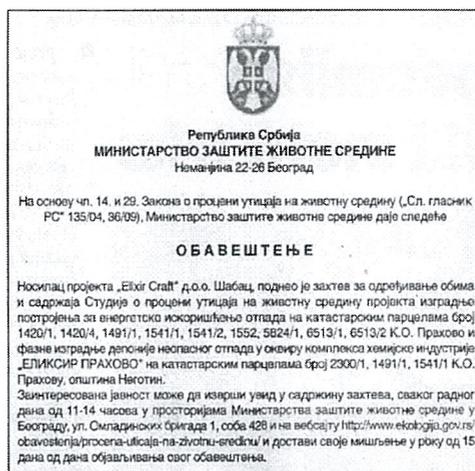
In addition to the legally defined procedure and public participation, by conducting additional voluntary early consultations with their local community, investors further contribute to the realization of these rights, thereby setting examples of good practice and demonstrating a true commitment to sustainable development and social responsibility.

### Voluntary Conduct of Early Consultations by the Investor

It is important to emphasize that there is no legal basis obliging the project investor to conduct early consultations with the local community in the manner and period in which they were carried out and presented in this Report. The early consultation process related to the construction of the Waste-to-Energy Plant in Prahovo was initiated at the earliest stage of the project preparation and conducted before the formal initiation of the legal procedure, which includes informing and involving the public, conducting public inspections and public hearings, which, in the decision-making process on the environmental impact assessment of the project, is conducted by the Ministry of Environmental Protection, as the relevant authority.

The investor initiated the early public consultation process for the Waste-to-Energy Plant project in Prahovo and presented it in detail to the local public in the period preceding the public announcement of the request for determining the scope and content of the Environmental Impact Assessment Study, which formally initiates the legal procedure under the jurisdiction of the Ministry of Environmental Protection.

The first consultations and public presentation of the project were held in October 2023, while the preparation phase began back in August 2022, when the first socio-demographic survey was conducted. The legal procedure was formally initiated in March 2024 by informing the public about the submitted Request for determining the scope and content of the



*Public Notification of the Project in the Daily Newspaper "Danas" – Wednesday, March 13, 2024*

<sup>6</sup> Law on Environmental Protection, Official Gazette of the RS, nos. 135/2004, 36/2009, 36/2009- other law, 72/2009- Ph.D. law, 43/2011- CC decision, 14/2016, 76/2018, 95/2018- other law and 95/2018- other law

<sup>7</sup> Law on Environmental Impact Assessment, Official Gazette of the RS, nos. 135/2004 and 36/2009

<sup>8</sup> Law on Strategic Environmental Impact Assessment, Official Gazette of the RS, nos. 135/2004 and 88/2010

Environmental Impact Assessment Study<sup>9</sup>, which the Investor, as the project holder, submits to the Ministry of Environmental Protection of the Republic of Serbia, as the relevant authority.

Although not legally required, these additional early consultations were motivated by examples of good practice from other investors and the Investor's need to fully and thoroughly inform the local public about the project, understand and consider its views and needs and adequately implement them into the project design. These activities require more time for preparation and the application of appropriate methods specifically tailored to the project and the local community, contributing to the quality of the process and complementing those prescribed by law.

## European Practice of Public Participation in the Consultation Process

In addition to regulatory bases, numerous examples from international practice highlight the significant advantages of additional active engagement by investors in conducting consultations with the local community in the earliest stages of a project. These advantages include increased efficiency, understanding and acceptance of the project by the local community, as demonstrated by examples from Copenhagen and Vienna, which stand out as exemplary cases of good European practice in this regard.

Furthermore, after researching good practice examples in Europe, it is important to emphasize that all examples differ from one another and that there is no predefined or universal practice guiding investors to conduct voluntary public consultations with the local community where a particular project is planned. Instead, these practices are specifically created by each investor, tailored to the specific projects, the specific local community and the circumstances relevant to each individual case. The reasons for this are numerous, including different legal frameworks, specificities of the planned project, circumstances of its realization, different views, needs, and expectations of the local population, as well as certain cultural and social characteristics of each local community.

The Aarhus Convention, which is a defining document in this field, has been implemented into the legislation of the countries that have ratified it in a way that allows for all these specificities and differences to be expressed. In other words, the responsibility lies with the investors, as project holders, to assess the best way to present the planned project to their local community, conduct the consultation process and achieve understanding and acceptance of the project.

In Copenhagen, during the realization of the Amager Bakke waste-to-energy plant project, the local community was involved from the very beginning through public forums, workshops and informational sessions. Citizens had the opportunity to provide feedback and actively participate in discussions about the plant's design and operations. Transparency was ensured by regularly publishing progress reports and environmental impact studies, allowing for open and honest communication with the community. Additionally, visits to similar facilities across Europe were organized to familiarize locals with the technology and environmental protection measures, thereby increasing their trust in the project.

Similarly, the Spittelau waste-to-energy plant in Vienna applied a thorough approach to informing and involving the community. Before construction began, the community was extensively informed about the benefits of the waste-to-energy plant through brochure distribution and public presentations, which were available in multiple languages to ensure accessibility for all community members. The community also had the opportunity to influence

---

<sup>9</sup> Law on Environmental Impact Assessment, Official Gazette of the RS, nos. 135/2004 and 36/2009

the aesthetic appearance of the plant by engaging the renowned artist Friedensreich Hundertwasser for the design, making the project a symbol of environmental awareness and artistic expression. The waste-to-energy plant is open to visits, allowing industry and business representatives, citizens and tourists to familiarize themselves with the process and technology of the waste-to-energy plant, further enhancing project transparency and public trust in these industrial waste management solutions.

## II METHODOLOGY

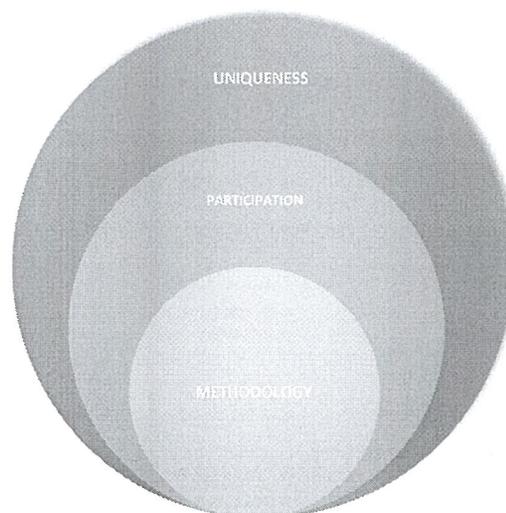
### Uniqueness and Participatory Nature

To effectively involve citizens in the construction of the Waste-to-Energy Plant in Prahovo, the Investor applied a precise methodology that includes various information strategies and communication channels with citizens. The methodology was created based on the IFC Environmental and Social Performance Standards, a set of guidelines developed by the International Finance Corporation (IFC), a member of the World Bank Group, to help companies and governments manage environmental and social risks and impacts. The standards cover a wide range of topics, from environmental protection, occupational safety and health, to respecting the rights of local communities and involving them in decision-making processes.

It is important to emphasize that applying IFC standards served solely as a starting point for developing a methodology that is authentic and focused on the specific requirements and expectations of the citizens of this particular local community. In other words, efforts were made to avoid the common methodological error of the "one size fits all" approach, which assumes that one solution or method can effectively address all situations and people, without considering their specific characteristics and the differences between cultures, geographical locations, or the specific needs and problems being addressed.

For this reason, to create an appropriate methodology for conducting consultations, a socio-demographic analysis of the local community was conducted to better understand the local socio-economic conditions, cultural patterns and ecological priorities considered important by the community. Based on the results of this analysis, a **unique** methodology was created along with all methods and channels for conducting consultations, including surveys, organized group and public meetings with citizen representatives, and others.

In addition to a unique consultation methodology that would respond to the specific characteristics of the local community, the goal was to ensure maximal **participatory** nature in the consultation processes. Participatory nature was ensured through developing and implementing methods that allowed all community members, including vulnerable groups, to actively participate in the dialogue, express their views, and contribute to the formation of final decisions. For this purpose, various communication channels and platforms were implemented, allowing citizens to participate in the consultation processes in the most suitable way, whether through online tools, direct gatherings or physical visits to the Office for Cooperation with the local community in the centre of Negotin, ensuring broader accessibility and inclusiveness of the process, but also a comprehensive overview of all aspects of projects that are of interest to the local community.



*The consultation methodology is based on the principle of uniqueness and participation*

## Methods and Channels of Consultation

For the purposes of defining the methodology of this participatory process, we distinguish the terms "method" and "communication channel". A method refers to the approach or technique used to collect information and make decisions, while a communication channel refers to the means or platform through which information is transmitted or exchanged. Channels can be digital (social media, email, websites) and physical (Elixir Group Community cooperation office, Investor's headquarters, meeting rooms in local communities and municipal administration).

In certain consultation contexts, the method is almost inseparable from the communication channel. For example, public meetings with citizens are a method used to gather feedback and involve citizens in decision-making, while simultaneously being a communication channel for direct information exchange between citizens and the Investor.

Methods and channels can be categorized as direct and indirect depending on the way of interaction with citizens.

Table 1: Overview of Consultation Methods and Channels

Type of Method/Channel	Name of Method/Channel
Direct	1. Survey (Method)
	2. Public Opinion Poll (Method)
	3. Meetings with Citizen Representatives (Method)
	4. Public Meetings with Citizens (Method)
	5. Office for Cooperation with the Local Community (Channel)
Indirect	6. Socio-demographic Research (Method)
	7. Defining Impact Zones (Method)
	8. Defining Vulnerable Groups (Method)
	9. Educational Materials (Channel)
	10. Digital Channels (Channel)
	11. Study Trip (Method)

## Timeframe

The timeframe of conducting consultations can be divided into two phases:

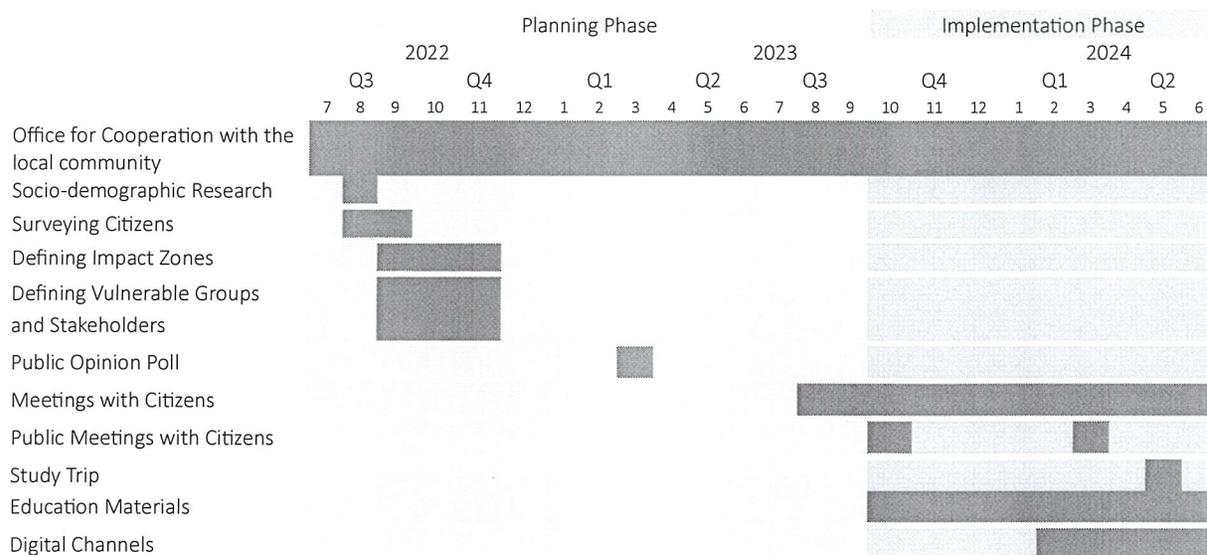
- a) the planning phase of consultations and
- b) the implementation phase of consultations;

The planning phase began in the third quarter of 2022 with the socio-demographic analysis of the Negotin municipality, while the consultation implementation phase lasted from the third quarter of 2023 to the second quarter of 2024. Overall, the process of early consultations with citizens initiated by the Investor lasted for two years.

However, consultations with citizens continued after the second quarter, as the legally defined process of informing and consulting citizens, defined by the Law on Environmental Impact Assessment<sup>10</sup>, which involves public notifications, public insight into relevant documentation, and holding public discussions, began.

<sup>10</sup> The Law on Environmental Impact Assessment (Official Gazette of the Republic of Serbia, nos. 135/2004 and 36/2009)

Table 2: Overview of the Consultation Timeframe



## Overview of Consultation Methods

### Socio-demographic Analysis

A socio-demographic analysis was carried out in August 2022 by the team of the Faculty of Geography, University of Belgrade, and the team of the "Green Loop" expert network in order to investigate the habits and attitudes of the citizens of Negotin in relation to waste management. The investor ordered this research in order to be thoroughly prepared for the presentation of the Waste-to-Energy Plant project.

This method included collecting and analysing data on age, gender, education, employment and other relevant social and economic characteristics of the population. The goal was to identify the specific needs and vulnerabilities of the local community to plan appropriate responses, communication channels and interventions in the context of the upcoming project.

The analysis revealed that the municipality of Negotin faces extremely unfavourable demographic trends, characterized by an above-average negative natural population growth, high emigration rates and an aging population compared to the rest of the Republic. With a population of approximately 28,900 residents (estimated for 2022), it is among the most sparsely populated areas in Serbia. A significant number of residents live abroad (12,427 people or 25% of the total population according to the 2011 census), while there is also a generational weakening of the returnee wave.

In addition to understanding the socio-demographic characteristics of the municipality of Negotin, this study defined a representative sample of respondents for the subsequent survey process.

## Survey

A survey of citizens was conducted on a sample defined during the socio-demographic analysis, representing a deep interview study where citizens' habits, attitudes, and awareness regarding waste management were examined. The representative sample of respondents was defined following UN-HABITAT methodology recommendations, resulting in a sample that effectively reflects the demographic structure and socio-economic conditions of the community.

The survey covered 30 households corresponding to the demographic sample of the municipality of Negotin and was conducted by the Green Loop expert network. An encouraging result showed that 96% of respondents support the construction of a waste-to-energy plant if it is built according to the highest environmental standards and without harmful impacts on the environment.

During the survey, although it was not one of the defined questions, many respondents spontaneously stated that they were aware of the Investor's plans to build a waste-to-energy plant and were informed about using waste as an energy source in cities in Europe.

However, a significant number of respondents expressed concerns about potential air pollution, as Negotin lacks a system for regular monitoring and effective control of air quality.

The research indicated an awareness of the economic and environmental benefits that the construction of the waste-to-energy plant could bring to the Negotin municipality, but it is essential to work on building community trust in the technology, the technology operator and the monitoring and control of air quality to prevent resistance to the project stemming from fear or a lack of relevant information.

## Defining Zones of Potential Project Impact

The zones of potential impact of the project include those settlements located in the immediate or wider vicinity of the chemical industry complex in Prahovo, which is the planned location of the project. The people living in these settlements are identified as key target groups with whom it is necessary to communicate all aspects of the planned project, environmental protection measures and prevention of impacts on their health, jobs, activities or hobbies in the most detailed manner.

When determining the zones of potential impact, parameters such as distance and position relative to the planned project location were analyzed.

Table 3: Stakeholder communities by project location

No.	Settlement	Type of Settlement	Population	Distance from the Project (km)
1	Prahovo	Village	799	2
2	Radujevac	Village	735	4
3	Samarinovac	Village	616	5
4	Srbovo	Village	289	6
5	Dušanovac	Village	548	7
6	Negotin	Municipality	14,647	10
7	Bukovo	Monastery	10	13

The settlement of Prahovo stands out as the closest settlement to the project location and is therefore identified as a key target group to which the greatest attention will be paid in the process of creating and conducting early consultations. This is to ensure trust in the project and to address concerns about environmental impact and quality of life for the residents.

In addition to Prahovo, the settlement of Radujevac has also been identified as a crucial target group due to its immediate geographical proximity. Negotin, as the administrative, cultural and social centre that gathers residents from all surrounding settlements and local communities, is also recognized as a key target group.

### Defining Potentially Vulnerable Groups and Stakeholders

During field research, respondents were encouraged by trained researchers to freely express their fears and concerns regarding the project. The most interest in the project appeared predominantly among respondents from the villages of Prahovo and Radujevac.

Based on information gathered from in-depth interviews, potential vulnerable groups and stakeholders were identified, along with the most common concerns and attitudes within these groups:

*Table 4: Overview of vulnerable groups and the most represented views regarding the project*

Potentially Vulnerable Groups	○ Farmers / Beekeepers / Fishermen
	○ Recreationalists (fishermen, hunters, cyclists, motorcyclists)
	○ Women / Mothers
	○ Representatives of associations / Environmental activists / Informal citizen groups
Stakeholders	○ Local businessmen
	○ Representatives of the Serbian Orthodox Church
	○ Civil servants (judges, directors of public companies, etc.)
	○ Representatives of the local self-government

### Public Opinion Poll

The public opinion poll, for which the Investor hired a specialized agency, aimed to examine the reputation of the Investor representatives and associated legal entities, such as Elixir Prahovo. The research was conducted as a telephone survey in March 2023, covering 404 respondents from Negotin municipality over the age of 18. The sample was a two-stage representative stratified sample, meaning the respondents were selected to reflect the demographic structure of the population by gender, age and type of settlement.

Regarding company awareness, most citizens (93%) have heard of Elixir Prahovo. Two-fifths of respondents believe they know the company well, while over half of the respondents state they know the company only superficially or almost nothing.

Most respondents who have heard of the company (77%) know what it does, with the most common association being the production of synthetic fertilizers, which is further associated with environmental pollution.

Three-fifths of respondents familiar with the company have a predominantly positive opinion of it. Favourable aspects of the company's operations highlighted by citizens include good working conditions and responsible business practices. Two-thirds of citizens familiar with the company believe it positively impacts the local community, particularly through job creation.

## Informative Meetings with Citizen

The investor held meetings with citizens' representatives during August and September 2023 as an activity in the preparation phase of direct consultations with citizens.

These meetings were focused on defining shared topics of interest, the most effective way of consulting with pre-defined potentially vulnerable groups (farmers, recreationists, women, mothers, association representatives, etc.) and interested parties (local businessmen, SOC representatives, etc.) in the project.

Based on numerous informational meetings, it was concluded that direct communication is the most effective method for conducting the consultation process. Consequently, efforts were directed towards preparing relevant digital, video and printed materials on all addressed topics and organizing public meetings with the residents.

## Public Meetings with Citizens

Public meetings with citizens were a direct and interactive method of consultation that enabled a transparent exchange of information between the Investor and local community. These meetings were crucial for explaining the details of the project, answering citizens' questions, collecting their suggestions and discussing the possible implications of the project for the community, which makes them the most important method of conducting consultations.

Public meetings with citizens encouraged open dialogue and enabled citizens to express their opinions, as well as to participate directly in decision-making processes.

In total, three public meetings were held - in Prahovo, Negotin and Radujevac. Citizens were invited from the ranks of pre-defined potentially vulnerable groups (farmers, recreationists, women, mothers, representatives of associations, etc.), as well as from the ranks of defined stakeholders (local businessmen, representatives of SOC, etc.) in the project.

*Table 5. Overview of Public Meetings with Citizens*

	Public meeting in Prahovo	Public meeting in Negotin	Public meeting in Radujevac
<i>Date of meeting</i>	October 18, 2023.	March 14, 2024.	March 15, 2024.
<i>Meeting place</i>	Community Assembly Prahovo	Municipal Assembly Hall Negotin	Elementary School in Radujevac
<i>Number of citizens</i>	70+	100+	80+
<i>Potentially vulnerable groups</i>	Farmers Recreationists Representatives of the motorcycle club Hajduk Veljko Women/Mothers	Representatives of the association "Negotinci in Action" Recreationists Women/Mothers	Farmers Recreational people Women/Mothers
<i>Stakeholders</i>	Local businessmen Representatives of the local community and local government	Local businessmen Representatives of the Serbian Orthodox Church (Bishop Hilarion of Timok, Archimandrite Kozma of the Bukovo Monastery, etc.) Municipal representatives Civil servants (judges, directors of public companies, etc.) Representatives of the local community and local government	Local businessmen Representatives of the local community and local government

<i>Representatives of the Investor</i>	<ol style="list-style-type: none"> <li>1. Elixir Group President Stanko Popović</li> <li>2. Elixir Group CEO Zorica Popović</li> <li>3. Director of the Eco Energy branch Dragan Stanojević</li> <li>4. Elixir Prahovo CEO Ljuba Stojčić</li> <li>5. Elixir Prahovo CEO Deputy Branko Marković</li> </ol> Other Employees of Elixir Craft, Eco Energy Branch, and Elixir Prahovo	<ol style="list-style-type: none"> <li>1. Elixir Group CEO Zorica Popović</li> <li>2. Elixir Group Vice President Vladimir Todorović</li> <li>3. Director of the Eco Energy branch Dragan Stanojević</li> <li>4. Elixir Prahovo CEO Ljuba Stojčić</li> <li>5. Elixir Prahovo CEO Deputy Branko Marković</li> </ol> Other Employees of Elixir Craft, Eco Energy Branch, and Elixir Prahovo	<ol style="list-style-type: none"> <li>1. Elixir Group CEO Zorica Popović</li> <li>2. Elixir Prahovo CEO Ljuba Stojčić</li> <li>3. Director of the Eco Energy branch Dragan Stanojević</li> <li>4. Elixir Prahovo CEO Deputy Branko Marković</li> <li>5. Elixir Foundation Director Margareta Musić</li> </ol> Other Employees of Elixir Craft, Eco Energy Branch, and Elixir Prahovo

The central part of each meeting was the discussion between the citizens and representatives of the Investor, where citizens had the opportunity to express their opinions and directly ask questions to the representatives of the Investor. Before the discussion, the General Director of Elixir Group, as the representative of the highest management body of the Investor, Zorica Popović, gave a detailed presentation on all aspects of the planned investment cycle and the project of construction of the Waste-to-Energy Plant in Prahovo at each public meeting. This included the screening of an educational film about the project, specifically prepared for consultations with the local community.

The goal of all this was to ensure that citizens were adequately informed, thus making them equal participants in the dialogue and discussion with the Investor.

*Public meeting in Prahovo, October 18, 2023.*



*Public Meeting in Negotin, March 14, 2024.*



*Public Meeting in Radujevac, March 15, 2024.*



### Study Trip and Education

Organized study trips and visits to waste-to-energy facilities proved to be a very effective and interactive method of consultation, allowing the local community to gain first-hand insight into the operational and technical aspects of similar facilities. The study trip involved a visit to the waste-to-energy plant in Vienna, which took place from May 27 to May 30, 2024. The invitation to citizens was publicly posted on the Elixir Eco Energy website and on the notice board of the Elixir Group's Office for Cooperation with the local community in the centre of Negotin.

A total of 43 citizens from Negotin, Prahovo, and Radujevac responded to the invitation. Among them were representatives of local civil servants, associations, civic environmental activists, farmers and other representatives of potentially vulnerable groups and stakeholders. They had the opportunity to visit the Pfaffenau waste-to-energy plant in detail, watch a film about the operation of the facility, and attend a lecture by leading Austrian waste management expert, Dr. Helga Stoiber.

Throughout the visit, representatives of the Investor were present, including Matijas Predojević, Vice President of Corporate Development; Dr. Nenad Ristić, Senior Manager for R&D Project Planning of the Group and Jadranka Radosavljević, Leading Environmental Protection Designer.

This delegation actively participated in the study visits and tours of the Pfaffenau waste-to-energy plant with each of the four groups of citizens. This proved to be very useful, as they

were able to closely communicate with small groups, clarify the technological solutions and environmental protection measures applied, draw practical and comprehensible parallels between the Vienna plant and the one planned for Prahovo and address any additional questions and concerns from the participants.



*One of the four groups of citizens in front of the Pfaffenau waste-to-energy plant in Vienna*

Following the visit to the waste-to-energy plant, educational and interactive presentations and workshops were conducted by Austrian waste management expert, Dr. Helga Stoiber. The topic covered initial Austrian experiences and the current functioning of the waste management system in Austria, including examples of best practices in communication between facility representatives and the local community. This was followed by a two-hour meeting between citizens and representatives of the Investor, where the project in Prahovo and all its aspects were discussed once again.

## Review of Communication Channels

### Educational Materials

- *Public PowerPoint Presentations*

As part of the educational materials prepared by the Investor for the citizen consultation process, PowerPoint presentations served as a visual tool that thoroughly explained the

economic, ecological and social motives and priorities for future development and planned investments by Elixir Group members at the chemical industry complex in Prahovo. The presentations focused in detail on the waste-to-energy plant project in Prahovo, including technology, standards, operational methods and environmental protection measures. These presentations were held at individual, group and public meetings with citizens and are available in digital format on the website [elixirecoenergy.rs](http://elixirecoenergy.rs). In addition to providing rich visual content, the presentations were designed to be illustrative and understandable, allowing citizens to gain a clearer understanding of the planned investment cycle and, in particular, the waste-to-energy plant project, its aspects and benefits for both the local and broader community.

- *Educational and Informative Film about the Project*

For the citizen consultation process, the Investor created an educational film that provides a comprehensive and understandable overview of the planned waste-to-energy plant project in Prahovo. The film was premiered as part of the prepared materials at all public meetings with citizens and is available for viewing on the website [elixirecoenergy.rs](http://elixirecoenergy.rs) and during working hours at the Office for Cooperation with the local community in the centre of Negotin. This film was diligently prepared by Elixir Group's multidisciplinary team and served as a powerful visual tool that illustrated and explained the complex technical details of the project, provided a clear insight into the applied technological solutions, environmental protection measures, safety systems, ecological benefits of the project and its justification and role within the waste management hierarchy.

- *Publication "Waste-to-Energy Plant in Prahovo: From A to Z"*

To further enrich understanding and access to information about the Waste-to-Energy Plant project, the Investor created a publication that thoroughly explains all key terms and aspects related to this project. Initially distributed to citizens at meetings, the publication is also available in digital format on our website, [elixirecoenergy.rs](http://elixirecoenergy.rs) and in printed form at the Community Relations Office in the centre of Negotin. We plan to produce a second edition of this publication to include all relevant terms associated with the project.

We use every opportunity to invite the public to participate in complementing the publication's content with their suggestions for new terms, making it a living document that grows and develops alongside the community, contributing to better understanding and greater citizen involvement in this one, but also in the future projects.

#### Digital Channels

- *Website [elixirecoenergy.rs](http://elixirecoenergy.rs)*

The Investor designed the website to provide easy and quick access to all information about the Waste-to-Energy Plant project. The website is regularly updated with the latest news and announcements of important project-related activities. The homepage prominently features a section where citizens can directly ask questions, facilitating communication and providing quick responses to inquiries. Additionally, the website publishes questions from citizens and answers to those questions submitted via email or directly at the Community Relations Office. This approach ensures that citizens can access requested information at any time and stay informed about all project-related developments.

- *Newsletter / Digital Bulletin*

To provide timely information to citizens, the Investor invited citizens to subscribe to receive a digital bulletin or newsletter. The creation of the newsletter was motivated by the idea of sending information about upcoming events and other relevant project-related topics directly

to the email addresses of interested citizens. However, since there were no subscriptions for this communication channel, the Investor focused attention on direct communication, particularly engaging the Community Relations Office to communicate with citizens.

- *Email Communication*

The Investor has provided the citizens a way to directly ask questions about the project or provide suggestions through the email address [ukljucise@elixirecoenergy.rs](mailto:ukljucise@elixirecoenergy.rs).

### Office for Cooperation with the Local Community

Adjusting to the needs and habits of the local community and recognizing that not all citizens are regular users of digital tools, the Investor has trained staff at the Office for Community Relations to ensure it serves as a continuous and effective communication channel regarding the project. This Office, already established as a place for interaction with citizens, has thus taken on an important role in providing support and access to information about the Waste-to-Energy Plant project to all interested residents.

Located at Trg Stevana Mokranjca No. 1 in Negotin, the Office is open every working day from 7:30 AM to 3:30 PM. Here, citizens can come to receive the latest information, ask questions, express concerns, or provide suggestions directly to our dedicated colleagues. The Office has become a crucial venue for direct, personal communication and citizen engagement, supporting their initiatives, which is vital for achieving transparency and successful collaboration with the local community.



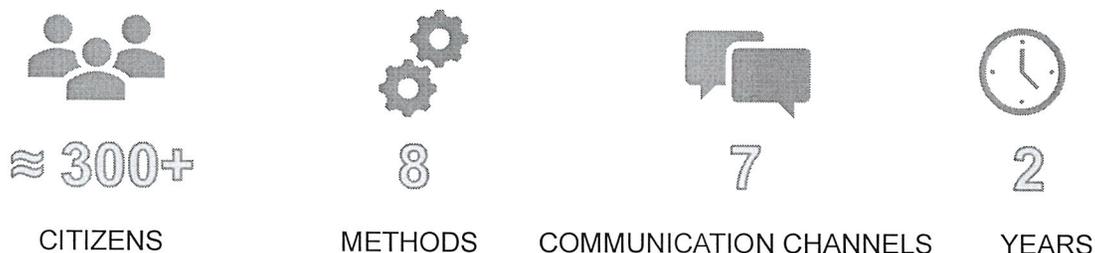
*Elixir Group's Office for Cooperation with the local community in the Centre of Negotin*

### III CONSULTATION RESULTS

#### Analysis of Conducted Consultations

During the consultations, three public meetings were held with over 230 residents of the Negotin municipality: over 50 in Prahovo, more than 100 in Negotin and over 80 in Radujevac. The consultation process lasted two years, from the third quarter of 2022 to the second quarter of 2024, including the planning and implementation phases. During this period, public opinion research was conducted via a telephone survey in March 2023, covering a sample of 404 respondents from Negotin over the age of 18, as well as a survey with citizens on a sample of 30 households according to the demographic sample of the Negotin municipality. Additionally, a study trip to the waste-to-energy plant in Vienna was organized from May 27 to 30, with over 50 residents participating.

These quantitative data illustrate the scope and intensity of consultations with the local community, highlighting the Investor's commitment to transparency and inclusiveness throughout the Waste-to-Energy Plant project implementation process in Prahovo.



*Consultations with Citizens in Numbers*

Furthermore, comprehensive community involvement in the Waste-to-Energy Plant project in Prahovo has allowed the Investor to gather and analyse a wealth of qualitative information, which is crucial for refining the project design and implementation. By carefully reviewing the opinions, objections, comments and questions raised by residents, several key themes have been identified that are of significant importance to the local community. These themes will be crucial in shaping the project's design and ensuring its successful implementation.

*Table 6. Frequently Asked Questions in the Consultation Process*

Frequently Asked Questions by Citizens	
1.	How will the operation of the waste-to-energy plant affect air quality?
2.	What types of waste will the waste-to-energy plant use?
3.	Which hazardous waste will be used most frequently? Will infectious and radioactive waste be used?
4.	Does the Investor plan to initiate the implementation of a household waste sorting system in Negotin to facilitate the thermal treatment of municipal waste from Negotin households?
5.	Will the Waste-to-Energy plant in Prahovo address the issue of municipal waste in Negotin and the problems with the landfill that burned for nearly a month?
6.	What will be done regarding air quality monitoring, and how can we be sure that everything is in order?
7.	How will the Investor ensure that people are well-informed with specific information about the project and all related activities?

The majority of citizen questions at all public meetings concerned the measures to be taken to ensure the safe operation of the Waste-to-Energy Plant, including the technologies to be used, the types of waste to be treated and the air quality monitoring and reporting process. Through the prepared materials and subsequent discussions, citizens received answers to all their questions. However, it was concluded that the environmental impact of the project was a major concern for citizens, who were most interested in the safe and environmentally responsible operation of the Waste-to-Energy Plant in Prahovo and how the Investor will ensure transparency and keep citizens informed about this issue.

Additionally, another major topic, particularly at the public meeting in Negotin and during the study visits to the plant in Vienna, was the problems in municipal waste management in the municipality of Negotin and how the Waste-to-Energy Plant project in Prahovo will benefit the local community in addressing this issue. In this context, citizens' dissatisfaction with frequent landfill fires, consequent air pollution and the lack of regular air quality monitoring and reporting systems was very pronounced.

Based on the analysis of the conducted consultations, three important conclusions were drawn, which were further developed into three specific measures that the Investor will undertake and implement in the project, as a direct result of the early consultations with the local community.

## Conclusions of the Conducted Consultations

### **1. Ensure Long-Term Transparency in the Operation of the Waste-to-Energy Plant**

Based on the consultation analyses presented, it was concluded that it is important for citizens to have continuous insight into the operation of the Waste-to-Energy Plant. Thus, defining a strategic and systematic approach to future long-term interactions between the Investor and the local community regarding the operation of the Waste-to-Energy Plant was identified as one of the conclusions of the consultations.

It was concluded that it is necessary to create and implement an adequate communication system and support the establishment of independent civil control, consisting of elected representatives of the citizens, as a way to ensure the local community's right to transparent and accessible insight into all data and information about the operation of the Waste-to-Energy Plant that are important to the citizens and as an obligation of the Investor to facilitate the exercise of these rights.

### **2. Enable Continuous Citizen Access to Air Quality Values**

The need for continuous monitoring and data on ambient air quality emerged as an important conclusion from consultations with citizens for at least two reasons.

Firstly, the most frequent questions from citizens were related to emissions into the air from the Waste-to-Energy Plant and its flue gas cleaning systems. Citizens wanted clear data and assurances that the Waste-to-Energy Plant would not compromise the quality of ambient air in any aspect.

Additionally, the fact that during the consultation period, especially in February and March 2024, just before the public meetings with citizens, the municipal landfill had been burning uncontrollably for nearly a month, highlighted the significance of air pollution caused by this incident. Consequently, citizens used the public meeting in Negotin, organized by the Investor and attended by local government representatives, to emphasize the importance and need for establishing continuous monitoring and reporting on ambient air quality.

It was concluded that it is necessary to establish monitoring and reporting on ambient air quality as soon as possible.

### 3. Contribute to the Municipal Waste Management System in the Municipality of Negotin

Considering that the public meetings with citizens held in March 2024 coincided with the fire at the municipal landfill, as previously mentioned, an important topic that emerged during the consultations was how the Waste-to-Energy Plant in Prahovo would impact the existing municipal waste management system in Negotin.

During discussions at public presentations and later during the study visits to the waste-to-energy plant in Vienna, citizens asked many questions specifically about whether the Waste-to-Energy Plant in Prahovo could contribute to the municipal waste management system in that municipality. Questions focused on whether the plant could help reduce the amount of waste deposited in the municipality, whether the plant's technology could thermally treat municipal waste, what conditions would need to be met, and whether the Investor intends to address issues in the municipal waste management system as part of the project.

It was concluded that there is a strong will and expectation from citizens for the Waste-to-Energy Plant in Prahovo to be part of the solution to the waste management problems in Negotin and the Investor is recognized as a partner who can contribute to resolving this issue.

## The Most Significant Measures Implemented in the Project

Based on the conclusions of the consultations, the Investor, in dialogue with the citizens, defined and presented corresponding measures. These measures are a direct result of the consultations between the Investor and the citizens and represent a direct contribution to participatory decision-making regarding the Waste-to-Energy Plant project in Prahovo, with the aim of strengthening trust and cooperation between the Investor and the local community.

Table 7: Comparative Review of Consultation Conclusions and Measures to be Implemented by the Investor

Conclusion of Consultations	Measures to be Taken
It is necessary to ensure long-term transparency in the operation of the Waste-to-Energy Plant.	→ The project must mandate support for establishing civil control of the Waste-to-Energy Plant's operations by independent representatives of the local community.
It is necessary to provide citizens with continuous monitoring and reporting on air quality.	→ Donation of funds for acquiring an automatic measurement station for continuous monitoring of ambient air quality in Negotin
The project needs to contribute to solving the problems in municipal waste management in the municipality of Negotin.	→ In collaboration with the local government, facilitate the implementation of permanent and sustainable solutions for municipal waste management in the municipality of Negotin.

## 1. Civil Control

Based on the conclusion that it is essential to ensure long-term transparency in the operation of the Waste-to-Energy Plant, the Investor has proposed the establishment of civil control, with full cooperation and support from the Investor in this process and in accordance with best practices from similar facilities in the European Union.

Civil control involves the active participation of representatives from the local community who will be trained and informed about the operation of the plant and will have 24/7 transparent and accessible insight to all data regarding its operational and emission parameters, as well as other information important to the citizens. Establishing civil control is both a right of the local community and an obligation of the Investor to facilitate and support.

In this context, the study trip to Vienna organized by the Investor, in addition to touring similar facilities and learning about their technology, included educating citizens on Austrian experiences and methods of involving community representatives in the control and monitoring of these facilities.

The establishment of a civil control system will not only enhance transparency and accountability but also contribute to building trust and strengthening the partnership between the Investor and the local community, which is crucial for the long-term success of the project and the well-being of all citizens.

## 2. Automated Air Quality Monitoring

To ensure continuous monitoring and access to air quality parameters, the Investor committed to the citizens at a public meeting in Negotin and subsequently fulfilled this commitment by donating funds to the municipality of Negotin for the procurement of an automatic air quality monitoring station for real-time measurement.

Continuous monitoring and public access to air quality data will allow the local community to stay informed about ambient air quality in real time, both before the Waste-to-Energy Plant in Prahovo begins operations and after its construction and commissioning. This measure will also contribute to building trust between the local community and the Investor, as citizens will be able to compare air quality data before and after the plant's operation and directly monitor its impact on air quality.

In collaboration between the local government, the Public Health Institute of Zaječar and the Environmental Protection Agency, the air quality parameters to be measured by the automatic monitoring station have been defined: sulfur dioxide, nitrogen dioxide/nitric oxide and total nitrogen oxides, carbon monoxide, ammonia, suspended particulate matter PM10 and PM2.5, as well as meteorological parameters - temperature, pressure, relative humidity, wind direction, and speed.

The automatic monitoring station will be part of the state monitoring network of the Environmental Protection Agency<sup>11</sup>, which will oversee the technical control of operations, data reception and processing and publication. The results will be publicly accessible to citizens in real time.

---

<sup>11</sup> [www.amskv.sepa.gov.rs](http://www.amskv.sepa.gov.rs)

**3. Enable the implementation of permanent and sustainable solutions for municipal waste management in the municipality of Negotin by the Project design**

Considering the needs and expectations of the citizens, the Investor has decided to design the project of the Waste-to-Energy Plant to enable the thermal treatment of non-recyclable municipal waste from the municipality of Negotin. The Investor has committed to actively collaborating with the local government and adhering to legal frameworks to create and implement a sustainable solution for municipal waste management in the municipality of Negotin, which will allow for the thermal treatment and permanent disposal of the entire non-recyclable fraction.

At the public meeting in Negotin, the Investor issued a public call to the local government for collaboration and partnership in creating and implementing modern and sustainable solutions, with the ambition for Negotin to become the first municipality in Serbia without a municipal waste landfill.

## REPORT CONCLUSION

The process of involving the local community through voluntary consultations in the earliest phase of the Waste-to-Energy Plant project in Prahovo has significantly contributed to a better understanding and acceptance of the project by the local community. Through comprehensive consultations, the Investor was able to ensure transparency and involve citizens in the decision-making process, resulting in the adaptation of the project to local needs and expectations.

One of the key outcomes of this process is the establishment of trust between the Investor and the community. Citizens had the opportunity to express their concerns, suggestions, opinions and expectations and the Investor responded to these inputs with specific measures that have been undertaken and implemented in the project.

The establishment of civil control will ensure that the operation of the plant remains transparent and accountable, while providing citizens with the opportunity to actively participate in monitoring and overseeing the environmental aspects of the project. Plans for the implementation of a real-time air quality monitoring system, including the donation of an automatic measuring station to the municipality of Negotin, are steps towards enabling civil control and generally improving the environmental transparency of this project.

Finally, the publicly expressed willingness of the Investor to contribute to the improvement of the municipal waste management system in the municipality of Negotin through the Waste-to-Energy Plant project in Prahovo, in partnership with the local government, is a clear signal that the Investor understands the needs of the local community and aims to contribute to the public interest with its commercial project.

The next steps in the public participation process in decision-making about the project relate to the legal procedure under the jurisdiction of state institutions, specifically the Ministry of Environmental Protection. This procedure includes a cross-border consultation process, defined by the Espoo Convention, involving the participation of relevant ministries and the public of Romania and Bulgaria, as well as public announcements and a public hearing on the Environmental Impact Assessment Study.

The expert and interested public, including civil society organizations, can and should participate by providing comments and asking questions about the environmental and safety aspects of the project, potential impacts, monitoring plans and environmental protection measures, as well as other aspects of the project presented in the Environmental Impact Assessment Study. Public participation will contribute to the improvement of the project and the quality of the Study itself, which is the basis for making decisions about the societal acceptance of projects that bring technological and economic development.

