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REPORT

Stakeholder Engagement Plan of the RWCM Rančevo, Sombor

Client: EBRD and AFD

Prepared by: ENVICO d.o.o. Belgrade, Serbia

Title: **Stakeholder Engagement Plan of the RWCM Rančevo, Sombor**

Client: EBRD and AFD

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Abbreviations and acronyms

A&A	Description
AFD	The French Development Agency
EBRD	The European Bank for Reconstruction and Development
LLC	Limited Liability Company
MBT	Mechanical Biological Treatment
MoEP	Ministry of Environmental Protection
MoF	Ministry of Finance of Republic of Serbia
RWMC	Regional Waste Management Center
RWMP	Regional Waste Management Plan
RWMS	Regional Waste Management System

1 INTRODUCTION

The Regional Waste Management System (RWMS) of Sombor is located in the West Bačka Administrative District, within the Autonomous Province of Vojvodina in the northwest of the Republic of Serbia (Figure 1). It includes 5 cities and municipalities from the district: Sombor, Apatin, Kula, Odžaci and Bač.

The project documentation sometimes refers to other towns and settlements. There are actually towns and settlements that are included in the jurisdiction of municipalities:

- Kula includes the settlements Crvenka, Ruski Krstur, Sivas, Kruščić, Lipar and Nova Crvenka;
- Odžaci includes the settlements Bački Brestovac, Bogojevo, Deronje, Srpski Miletić, Lalić, Karavukovo, Bački Gradac and Ratkovo;
- Apatin includes the settlements Svilojevo, Kupusina, Prigrevica and Sonta;
- Bač includes the settlements Bačko Novo selo, Bođani, Vajska, Plavna and Selenča;
- Sombor includes the settlements Aleksa Šantić, Bački Breg, Bački Monoštor, Bezdán, Gakovo, Dorslovo, Kljajićevo, Kolut, Rastina, Riđica, Svetozar Miletić, Stanišić, Stapar, Telečka, Čonoplja.

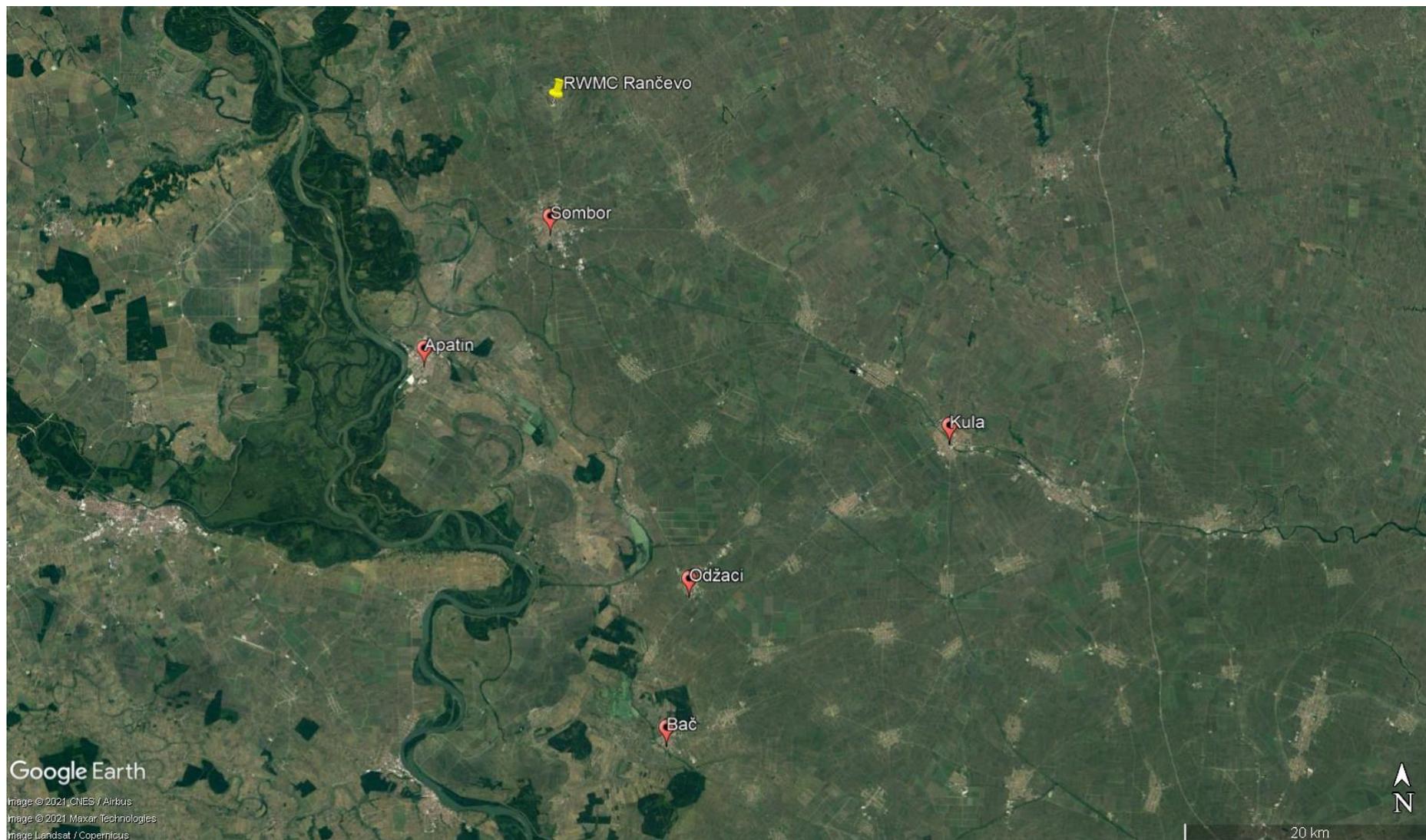


Figure 1 Macro location of the Project

(Source: Google Earth)

According to the TOR, this site is one of several sites that are part of the solid waste management system across the country that will be supported by the European Bank for Reconstruction and Development ("EBRD") and the French Development Agency (AFD) (hereinafter "the Banks"). The Banks are each considering providing a free loan in a cumulative amount of up to EUR 100 million (EUR 50 million per Bank, hereinafter the "Loans") to the Republic of Serbia (hereinafter the "Borrower").

The borrower on the investment component 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 (MoEP), the ministry in charge of building waste collection and treatment systems. As such, **MoEP will be the project owner of the program**, via a PIU housed within the ministry.

In order to support appraisal of the Program, AFD has committed a EUR 500,000 grant (framework contract with SEURECA/ENVICO) to conduct the detailed assessment of several sub-projects under the Program with an integrated approach encompassing all the components of the waste management system.

According to national plan location is one of 4 locations that are part of this intervention. Regional waste management system (**RWMS) Rančevo, Sombor** covers 5 cities and estimated cost is 34 M€ including collection. The future Sombor RWMC, "Rančevo", which will consist of a sanitary landfill, a MBT and a sorting plant for plastic packaging waste, is within the jurisdiction of the city limits of Sombor.

The latest Regional SWM plan was prepared 13 years ago, and it is outdated. The most reliable planning perspective at the moment is offered by the Local SWM plan for Sombor, from 2011, last revised in 2018, and with its formal validity for the period until 2021, but also with perspectives to be extended to 2028.¹

The planned depreciation life of the Center's facilities is 33.3 years, and the depreciation is projected the equipment is 10 years old, however provided the equipment is properly maintained, its life can be much longer.²

Within this assessment Consultant will prepare Stakeholder Engagement Plan (SEP). Main aim of the SEP is to provide detailed involvement of different stakeholders at local, regional and national level in different phases of the project cycle (pre-construction, construction activities and operation) (Table 1).

Table 1 Project Phases

Phase	Status of each phase
Phase 1: Pre-construction Phase	Planned
Phase 2: Construction Phase	Planned
Phase 3: Operation	Planned

¹ Inception report Seureca/Envico 2021

² Feasibility study

In addition, it is necessary to define mechanisms of participation and identification of needs of particularly vulnerable groups. The document also includes a grievance mechanism for stakeholders to raise any concerns about the Project.

The main objectives of stakeholder engagements in different phases of the project implementation can be described as follows:

- To provide necessary information to persons affected or likely to be affected by the Intervention as well as opportunities to participate in decision making and commenting
- To establish effective channels of communication at local and regional level
- To develop and put in place an effective grievance and mediation mechanisms

2 STAKEHOLDER ENGAGEMENT PLAN

2.1 The Project location and areas subject to impact

The RWMS covers an area of 1,216.47 km², which is 14.80% of the territory of Bačka and 5.66% of the territory of the Autonomous Province of Vojvodina. The future RWMC is located north of Bilić, a rural, agricultural area, at a distance of approximately 1000 m and south of Rančevo, another rural agricultural area, at a distance of about 1100 m (Figure 2). Located next to the existing landfill is an empty building lot. The RWMC "Rančevo" will consist of a sanitary landfill, a MBT and a sorting plant for plastic packaging waste.

The location of the RWMC is planned between the east side the existing body of the unsanitary landfill and the local municipal road. The dimensions of the center are total about 55,000 m². All parcels are in public ownership and ownership of the City Sombor and there are no residential buildings built on the subject location and in the vicinity of the surroundings from Salas settlements.³ The waste management center is from the center of Sombor distance of 11.5 km, and from the northern city bypass 6 km.

According to the determination of the City of Sombor RWMC will be managed through public - private partnership and in cooperation with other local self-government.⁴

³ According to data obtained from Republic Geodetic Authority.

⁴ Feasibility study



Figure 2 RWMS Sombor project location
(Source: Google Earth)

2.2 Record what the Project is legally required to do regarding disclosure and consultation

Public disclosure and consultation procedures for project like this are organized in accordance to Serbian legislation that regulates development and adoption of spatial and regulation plans for cities, municipalities, neighborhoods. The Serbian law which regulates these issues is the Law on Planning and Construction ("Official Gazette of the RS", No. 72/2009, 81/2009 - correction, 64/2010 - decision of the CC, 24/2011, 121/2012, 42/2013 - decision of the CC, 50/2013 - decision of the CC, 98/2013 - decision of the CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other act, 9/2020 and 52/2021).

There are some obligatory steps to be conducted:

- Informing the public through the media about details of disclosure of the draft plan/document to secure transparency of the process
- Organization of public hearing to present the draft plan/document
- organize collection of comments from different actors
- preparation of adjusted plan or document in accordance to received comments
- 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 and 88/2010).

The EBRD developed Environmental and Social Policy which defines 10 Performance Requirements (PRs) for key areas of environmental and social sustainability that projects and documents are obliged to meet, including PR10 Information Disclosure and Stakeholder Engagement. PR10 principles are focused on of strong stakeholder engagement as a focal point in order to achieve strong, constructive and responsible relationship necessary for the successful management of environmental and social impacts and issues

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 organizations 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.

All projects should establish a formalized procedure or process for dealing with both workers' and communities' grievances⁵. Each should include as a minimum:

- assigning a responsible person, team or function to organize the resolution of grievances
- defined timeframes for acknowledgement of the receipt of complaints and subsequent resolution

⁵ Grievance Management, guide note

- practical arrangements for maintaining confidentiality, reviewing and resolving grievances, including resources and organizational arrangements
- information on the grievance mechanism that is readily retrievable from respected web site, locations where project information in hard copy has been placed, and/or from leading part representatives

The EBRD PR10 requires permanent activities and engagement during project implementation in all phases of the project activities to secure presence of all elements of grievance mechanism in order to receive and facilitate resolution of stakeholders’ concerns and complains.

There are some gaps between national requirements and requirements defined by Banks in the area of public consultations and stakeholder engagement. National regulations define certain procedures that are not systematized and do not provide sufficient details of how it should look in practice and be applied in different sectors. In that case, the requirements defined by the Banks must be applied and procedures presented in this document tries to define the process of providing the whole grievance mechanism adequate stakeholder participation.

2.3 Identification of stakeholders

Stakeholders will be presented in the table and assessed their potential level of interest. This list of stakeholders can be modified, as well as level of interference from internal or external factor during the implementation of project phases. It is good to emphasize that level of impact is not the same for all groups in all municipalities (Table 2).

Table 2 Stakeholders group

Stakeholder group	Level of interest	Level of influence	Level of power
<ul style="list-style-type: none"> ▪ The Government of Republic of Serbia ▪ Ministry of Environmental Protection (MoEP) - Department for Project Management 	High	High	High
<ul style="list-style-type: none"> ▪ Municipality of Sombor ▪ Municipalities of Kula, Apatin, Bač, Odžaci ▪ PUC from those municipalities 	High	High	High
<p>Affected Population:</p> <ul style="list-style-type: none"> ▪ Informal waste pickers engaged on regular and non- regulated landfills are recognized but there are no additional data ▪ Inhabitants of the selected municipalities ▪ Enterprises as a part of chain in waste 	High	Medium	Low

Stakeholder group	Level of interest	Level of influence	Level of power
management system			
External Stakeholders like <ul style="list-style-type: none"> ▪ CSOs dealing with ecology and vulnerable groups ▪ Media (regional or national one) 	High	Medium	Medium

Currently, each municipality has PUC that is responsible for municipal landfill. In addition, in two municipalities - Kula and Odžaci, several PUCs are established to serve the needs of the separate settlements within the administrative territory of the municipality. Managing bodies of all PUCs are the Supervisory Board and Director/General Manager.

Despite the fact that RWMP is ongoing the City of Sombor has not established a regional /intermunicipal company for SWM with other four participating municipalities in the region and the Sombor region. According to local plan city of Sombor future RWMC will be established in the form of the public-private partnership. The private sector can be an important source of capital investments, financing and transfer of technical and operational 'know-how' (technological knowledge and experience). The private sector, through the arrangement of public-private partnership, can be included in the Sombor RWMC and the realisation of capital investments. Proposed institutional framework for public-private partnership should be stimulating, i.e. to encourage private sector investing⁶. Regarding future planned transfer stations (Figure 3), the PUCs will be in charge of operation and waste transport to the Regional Centre. When the Sombor RWMC is in operation, it will be responsible for the waste treatment, recycling and final disposal of the waste received in the centre.

⁶ Inception report Seureca/Envico 2021

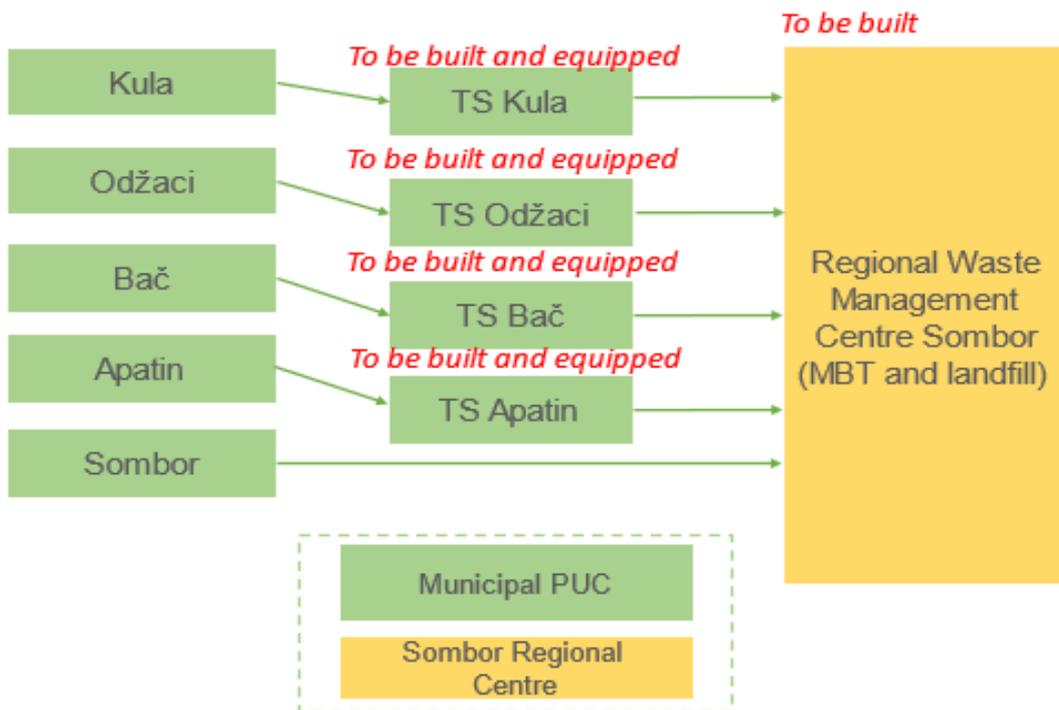


Figure 3 Stakeholder roles

(Source: Inception report, Seureca/Envico 2021)

2.4 Report on any previous consultation and disclosure activities

The Assembly of the City of Sombor is at its 32nd session held on March 25, 2019. Brought Decision on the development of a Detailed Regulation Plan for the expanded capacities of the landfill RWMC Rančevo ("Official Gazette of the City of Sombor" No. 5/2019). The City Administration of the City of Sombor organized public insight in September 2019⁷ as well as in September 2020⁸. Information about public insight were announced at official website City of Sombor as well as in local newspapers.

In November 2019 project proposal for the provision of municipal waste treatment and disposal services at the landfill "Rančevo" was developed and it was one of the points in agenda at 39th session of the Assembly of the City of Sombor.⁹

⁷ News for 2019, <https://www.sombor.rs/arhiva-javna-rasprava-uid/2019-godina/rani-javni-uid-u-materijal-za-izradu-plana-detaljne-regulacije-za-prosirenje-kapaciteta-postojeće-deponije-rancevo-centar-za-tretman-otpada-06-09-20-09-2019/>

⁸ News for 2020, <https://www.sombor.rs/arhiva-javna-rasprava-uid/2020-godina/javni-uid-u-nacrt-plana-detaljne-regulacije-za-prosirenje-kapaciteta-postojeće-deponije-rancevo-centar-za-tretman-otpada-06-12-10-01-2020/>

⁹ <https://www.soinfo.org/vesti/vest/22381/javno-privatno-partnerstvo-za-deponiju-rancevo/>

In March 2020 of a preliminary feasibility study with the general design was developed, while in April 2020 CEEFOR developed report on cost-benefit analysis, and feasibility study with a preliminary design. Despite that, study isn't yet publicly available.

Having in mind that feasibility study was developed, in August 2020 City of Sombor received funds for construction of RWMC¹⁰. As planned in preconstruction phase, next step should be announcing a public procurement for the selection of construction contractors and procurement.

2.5 Stakeholder engagement plan

All phases of the project cycle will have own sub-plans for activation and participation of different stakeholders. Roles and responsibilities will be fine-tuned according to current situation and circumstances. Since COVID -19 pandemic is ongoing and different measures depend on number of infected, all consultations and public events need to be adjusted. In addition, it is necessary to develop protocol as part of stakeholder plan where will be described all necessary steps in organizing public events during pandemic.

In precreation phase it is necessary to identify key messages for communication with general public like those that will emphasize that reducing waste in the environment will directly improve the public community health.

Having in mind that for RWMC in Sombor still hasn't been established, in order to strengthen communication between PUC as well as other relevant actors at local level Coordination body (CB) should be formed. Coordination body should include representatives of PUCs in five municipalities, representatives of municipalities, as well as relevant NGOs, especially those dealing with vulnerable groups. During the preconstruction phase, CB should organize regular meetings which will serve to discuss and present RWMP. That way, the process of information dissemination and sensibilization of general public would be easier. Once Company is established all information should be shared on newly established Company website.

In line with the project cycle timeline, Municipality of Sombor with support of CB, should organize 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 should also serve as platforms for potentially affected people to ask questions and provide suggestions for further mitigation measures.

Meetings should be organized with local CSOs that represent different vulnerable groups. Using support of local organization could speed up the process of consultations and make communication with different groups easier.

Special focus should be put on informal waste pickers engaged on current regulated and non-regulated landfills Formal and informal waste pickers engaged on non-regulated landfills should be informed on planned schedule for closing the landfills. The waste pickers should be

¹⁰ <https://www.sombor.rs/grad-dobio-sredstva-za-regionalni-centar-za-upravljanje-otpadom/>

informed in timely manner on the anticipated dates for closing of the landfills and their inability to continue with waste picking activities.

Workers engaged in all phases will have opportunity to communicate working conditions and safety measures with the Municipality, Company and the Contractor.

All meetings need to be announced through the local media, on websites of main stakeholder Company and municipalities in hard copies, as well as using social media. All materials related to stakeholder engagement need to 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.

2.6 Pre-Construction Phase

Table 3 Stakeholder Engagement Plan for Pre-Construction Phase

Activity ¹¹	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Sensibilization of general public on waste separation, fees and future plans in the region ^a	All municipalities Local NGOs CB	At the beginning of preconstruction phase	Coordination body	Leaflets Public debates Public campaign	Discussion during public debates	Notes

¹¹ In the 2013 Environmental Impact Assessment (EIA), it was mentioned that there exists Roma who collect waste on site and in other locations, to sell it to the recycling facilities. Their question is rudimentarily processed. Since there is currently no waste at the landfill site, it is assumed that there is none waste collection. There are no indications for relocation for this project, with or without coercion.

Activity ¹¹	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Notify stakeholders on the implementation Program	CB	30 days after formal approval of the Project. One-off	Municipality of Sombor Contractor	Announcement on website of all municipalities and respected web sites., at premises and main public places of the affected municipality. Local liaison officer on behalf of company Local newspapers, TV channels, radio, social media)	Response via official correspondence, e-mail.	Press clippings Notifications as published in the affected municipalities and websites Records on complains
Special focus on communication strategy with vulnerable groups	Vulnerable groups/persons	In line with activity schedule	Local municipalities Local CSOs	Local organizations, representing different vulnerable groups can in cooperation with local self-government representatives communicate and collect comments on current activities	Meetings and local workshops can be used for discussion and collection of comments	Reports and notes from the meetings

2.7 Construction

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

Table 4 Stakeholder Engagement Plan for the Construction Phase

Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
To inform all municipalities and stakeholders about anticipated construction activities	Project affected persons from 5 municipalities, general public, stakeholders, CB	At least starting from 30 days prior to construction.	Contractor(s) Sombor municipality	Websites of company, contractor and municipalities, official correspondence, mass media, local noticeboards and premises of municipalities, project leaflets Liaison Officer	Grievance mechanism Liaison officer (LO)	Comments on posts on the websites Press clippings Written correspondence with relevant authorities and organizations from different level of authority
Share information on employment opportunities in all 5 municipalities as well as in neighboring	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	In the final part of the previous phase	Contractor, Local branches of National employment office,	Contractor's website, official correspondence, mass media, local noticeboards, and premises of municipalities. Employers' website 5 local NES branches	Via Contractors website Via Contractors LO	Notifications as published in affected municipalities and websites

Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
Share the information on project Environmental and Social performance.	General Public NGOs dealing with ecology and vulnerable groups	Semi-annually	Established company Contractor	Local presentations with guest speakers Websites	Meetings	Notes, Comments on the websites
Direct communication with NGOs representing vulnerable groups	Vulnerable groups/ individuals	Semi -annually	New established Company and contractor with local NGOs	All channels of communication will be defined with local NGOs taking into account needs and specificities of vulnerable groups Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, using non-technical language will be prepared for information to be disseminated and disclosed.	During the meeting, home visits, telephone calls	Systematized comments and suggestions from different meanings of communication

2.8 Operation

Table 5 Stakeholder Engagement Plan for the Operation Phase

Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Mediatool	Opportunity for Stakeholder Comment
Clear announcement of transition of responsibilities and liabilities from Contractor(s) to the company	Affected communities, other public utility companies, Project affected persons, General public.	At least starting from three months prior to termination of works	Contractor with new established company	Contractors' grievance /liaison officer The company website, official correspondence, massmedia, local noticeboards and premises of 5municipalities.	Contractors' grievance /liaison officer The company website
Keep stakeholders informed on any operation -related activities that might affect them (e.g. notify stakeholders changes in the fee amounts for wastecollection and disposal)	General public Local /regional/ nationalauthorities	From commencement of operation phase and on going	The newly Company	Mass media. The company website Municipalities websites	As envisaged by national law

3 GRIEVANCE REDRESS MECHANISM

The Project Specific Grievance Mechanism shall be designed for the Project implementation and described in the SEP for all phases of the project cycle. Regional sanitary landfill for municipal waste at location Rančevo is key actor in the mechanism. Any person or organization may send comments, complaints and/or requests for information in person or via telephone or email to the Regional sanitary landfill for municipal waste – The new established company. The Company director and the president of the Assembly are in charge for addressing all complaints and forward 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.

One of the most important principles is principle of anonymity. The mechanism will allow submission of complaints are raised anonymously. All information on the grievance holder will be treated with confidentiality.

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 Logbook will have all necessary elements to disaggregate the grievance by gender and location 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 optionally, if holder would like to receive feedback information, or clarifications on the grievance content.
- summaries description of grievance containing all necessary data,
- date of receipt / acknowledgement returned to the complainant,
- response plan: description and type of actions taken (investigation, corrective measures) and how were they communicated to the grievance holder with predicted time
- 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.

The reception of grievance should be formally acknowledged in accordance with current COVID-19 government measures such as: 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 and expect answer 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 minimize unnecessary/unwarranted actions. If they agree with the approach required actions are implemented to deal with the issue.

Completion of actions should be recorded in the Grievance Logbook.

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.

At all times, complainants are also able to seek legal remedies in accordance with local laws and regulations. Separate team should deal just with this part of the cases.

The implementation of the Stakeholder Engagement Plan is the overall responsibility of Regional sanitary landfill for municipal waste – The Company and Contractor 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 Regional sanitary landfill for municipal waste – The Company the Contractor need to have Liaison Officer (LO) appointed as a focal point, to liaise with general public and stakeholders and to collect their grievances related to construction activities and grievance management. List of compliances need to be integrated into monthly report for supervising authorities. General population of the affected communities will be informed about the LO contact information before construction begins, through announcements in the municipality's premises of the local community offices (srp. mesne zajednice) and their representatives and the media, where appropriate.

4 MONITORING AND REPORTING ACTIVITIES FOR THE STAKEHOLDER ENGAGEMENT PROCESS

Monitoring and reporting activities of implementation of stakeholder engagement plan need to be developed in annual plan of The Company as well as report for previous year. Monitoring and report matrix need to have indicators that will allow accurate and easy monitoring and reporting. Main purpose of the reporting material is to know level of implementation of the project activities and level of influence and participation of different stakeholders.

- The SEP should be presented and available for the public to comment.
- All activities foreseen in the plan need to be scheduled and communicated.
- The minutes of consultation meetings are collected and registered in the official evidence.
- Grievances are logged and tracked through to resolution within a timeframe of 30 working days from confirmation of receipt (noted in updated Grievance Logbook).
- Semi-annual Grievance Report to be prepared and made publicly available.
- Contractors and subcontractors and associate's include parts obliging them to adopt SEP requirements, as appropriate.
- Contactors 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 as part of annual report of the Company need to be publicly available.



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