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REPORT

Non-Technical Executive Summary of the RWCM Banjica, Nova Varoš

Client: EBRD and AFD

Prepared by:	ENVICO d.o.o. Belgrade, Serbia
Title:	**Non-Technical Executive Summary of the RWCM Banjica, Nova Varoš**
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Content

Abbreviations and acronyms

A&A	Description
AFD	French Development Agency
CTMP	Construction Traffic Management Plan
CH	Critical Habitat
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
EPRP	Emergency Preparedness and Response Plan
ESAP	Environmental and Social Action Plan
ESAR	Environmental and Social Appraisal Report
ESHS	Environmental, Social Health and Safety
ESMS	Environmental and Social Management System
EU	European Union
H&S	Health and Safety
ISO	International Organization for Standardization
MRF	Materials Recovery Facility
NGO	Non-governmental Organization
N/A	Not Applicable
NES	National Employment Service
OESMP	Operation Environmental and Social Management Plan
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PR	Performance Requirement
PUC	Public Utility Company
RS	Republic of Serbia
RWMC	Regional Waste Management Center
RWMS	Regional Waste Management System
SEP	Stakeholder Engagement Plan
TMP	Traffic Management Plan
ToR	Terms of Reference
TS	Transfer Station
WHO	World Health Organization
WWTP	Waste Water Treatment Plant

1 INTRODUCTION

The European Bank for Reconstruction and Development ("EBRD") and the French Development Agency (AFD) ("the Banks" or "the Lenders") are considering providing a sovereign loan of up to EUR 100 million to the Republic of Serbia to finance critical improvements in the solid waste management system across several secondary cities in the country, which includes construction of the Regional Waste Management Center Banjica in municipality of Nova Varoš ("the Project").

The Regional Waste Management System of Nova Varoš (RWMS) consists of 4 municipalities.

Initially, the construction of Banjica sanitary landfill started in 2007, however new legislation, lack of funds and issues with the project's feasibility resulted in termination of construction works. Consequently, the municipalities have continued to use unsanitary dumpsites for waste disposal which presents high risk to the environment and human health. Although the landfill was redesigned and adapted in 2013, no progress was made in construction works since then.

The goal of the RWMS is to construction of a sanitary landfill, a mechanical biological treatment (MBT) and a composting facility.

Currently, local self-government units, the municipalities of Nova Varoš, Prijepolje, Priboj, and Sjenica dispose of waste at the Regional Sanitary Landfill "Duboko" Užice, with reloading at the transfer station in Nova Varoš in line with the Decision on joint provision and implementation of waste management (No. 353-5076 /2018, June 2018).

After the construction of the regional landfill "Banjica", certain parts of the transfer station facility will be used for the needs of the receiving part of the landfill. Along with the construction of a transfer station with a recycling yard, municipalities will be obliged to enter the process of primary waste separation at the place of its origin.

2 PROJECT DESCRIPTION

The Project will consist of the following two phases:

- Phase I: Construction and operation of the transfer station with recycling yard (TS) in the same location as planned RWMC. This will be transitional solution until the opening of the sanitary landfill and other RWMC facilities.
- Phase II: Construction and operation of the Regional Waste Management Center (RWMC).

New regional waste management center will consist of facility for mechanical separation of waste, new landfill cells, leachate treatment facility and composting facility for organic waste. The realization of the Project is planned according to the principle of "yellow FIDIC", i.e. the design phase, obtaining all conditions, consents, and permits, and the execution phase, will be entrusted to one Contractor (company, consortium etc.).

Following main facilities are planned to be constructed as a part of the RWMC:

- Sanitary landfill;
- Facility for treatment of solid municipal waste, i.e. facility for sorting separately collected packaging waste - recycling center;
- Plateau and canopy with a mobile plant for the treatment of biological waste (compost);
- Recycling yard for reception and storage of non-hazardous and hazardous waste from citizens: covered storage for reception and temporary storage of waste (processed by the transfer station project);
- Necessary auxiliary infrastructure and facilities;
- Additional machines and construction vehicles for waste handling within the Regional Centre.

According to a projection from 2011, a total of 595,631 tons of municipal waste will be produced over the next 20 years (2011-2031) in the Region. The estimated current amount of waste generated in the Region is 71.9 t / day.

The designed project is based on the estimated capacity of the landfill of 300,000 m^3 which is deemed sufficient to meet the needs for the next 20 years.

Phased filling of the landfill will be conducted in 9 cycles, taking into account the geometry of the bottom of the landfill (4 cascade cassettes) and the levels of the roundabout, with the construction of supporting embankments to increase the available volume for landfilling.

Landfill filling technology is via daily cells whose geometry requires the smallest possible work surface for the day cover layer - an alternative cover made of HDPE or PP fibres.

The location of "Banjica" is situated in the farthest northwest part of the municipality of Nova Varoš, near the state road IIA no. 191 (Bistrica - Priboj), in the section of the Banjički creek riverbed on the right bank of Potpeć Lake (Lim River) towards Pribojske Čelice (Figure 1). It is

about 2.5 km away from the village of Bistrica. The location is relatively close from municipal centers, except for the municipality of Sjenica, which is further away. The average distances between municipalities and the location of the landfill are 18.5 km for Nova Varoš, 12.5 km for Prijepolje, 16.5 km for Priboj, and about 48 km for Sjenica.

The territory of the future Center complex includes a wider area of the enclosure for the processing and disposal of waste with the necessary facilities and an access road with a connection to the Bistrica-Priboj road.

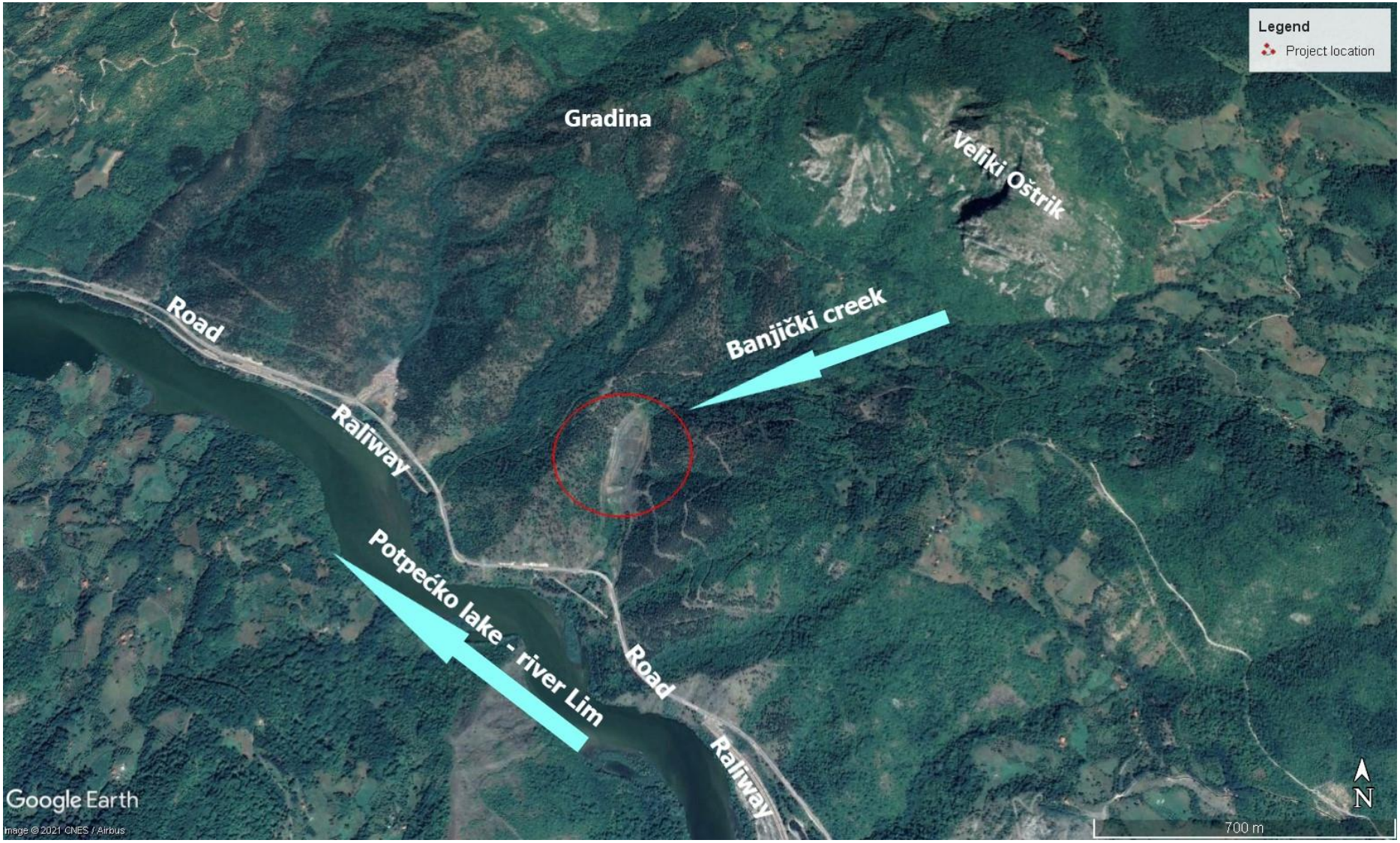

Figure 1 Location of RWMC Banjica
(Source: Environmental Impact Assessment Study March 2021)

3 BACKGROUND

3.1 History of the Project

In 2002 it was decided to start with the design of a landfill serving as a state-of-the-art disposal facility to the municipalities of Nova Varoš, Prijepolje, Sjenica and Priboj. Permit for construction was issued in 2006 after going through an environmental impact assessment and approval process. With the financial support of the national government, works (mostly earthworks) were started and stopped in 2007 after exceeding the budget. Due to changes in legal framework and to harmonization with EU regulations the landfill was redesigned in 2013 and adapted by the Faculty of Technical Science, Novi Sad.

The latest RWMP of the RWMS Nova Varoš is from 2011. This RWMP states the following:

- Proposal of having 1 transfer station in the municipality of Sjenica, which is the most remote municipality from the RWMS
- The other 3 municipalities will bring waste directly to the RMWS
- To have a waste separation line in each municipality or at the landfill
- All existing landfills should be closed and rehabilitated as soon as possible in order to enact recultivation, as well as the dumping site closed.

Loan of the Banks will cover some of the items of the plan such as: Construction and equipment of **1 transfer stations,** procurement of **truck for secondary collection,** construction of the Banjica sanitary landfill + leachate treatment and construction of an MRF and a composting plant.

The landfill is designed for an operational period of 20 years, but with by implementing the new waste management strategy 2020-2025 its life will be extended.

3.2 Current environmental and social situation and considerations

Air Quality

For the Project location there is no available air quality data. Air quality baseline data collection was not performed prior the initial works in 2007, nor for the purpose of Environmental Impact Assessment Studies.

Environmental Noise

The location of the future RWMC is relatively isolated, with minimal noise level. Considering the distance of the nearest and farthest part of the location from the main road Priboj - Bistrica of 100-500 m, and the railway Belgrade - Bar of about 170-570 m, the traffic noise at the location is minor with insignificant intensity.

Biodiversity

There are no precise data on the flora and fauna of the Project area. Based on the survey of the surrounding terrain, it can be stated that the surroundings of the location "Banjica" are covered by mixed forests, deciduous but mostly coniferous (pine). Willows are present near the bed of Banjički stream, while the body of the already excavated landfill is covered in places by low shrubby plants and young trees. The Project area is not located in protected or strictly protected biodiversity areas. No project specific biodiversity baseline surveys were undertaken to inform the EIA Studies.

Cultural Heritage

There are no areas protected by international, national, and local regulations near the Project site. All archaeological sites, objects under previous protection, and immovable cultural goods near the site, are located at a distance of more than 1 km from the site "Banjica".

However, developed Environmental Studies do not include the conditions/opinion of the relevant Institute for Protection of Cultural Monuments, which is an obligation under local law. The Client/Investor is obligated to request the opinion of the responsible Institute for Protection of Cultural Monuments to confirm/identify the presence of immovable cultural heritage.

Soil Quality

Environmental Study for the RWMC developed in 2021 states that geological reconnaissance of the terrain was performed with the aim of determining the lithological structure of the terrain of the stream valley of Banjički stream to the topographic watershed and the upstream unregulated part of the watercourse, where a significant thickness of torrential sediment of limestone blocks and fine debris from fossilized sipar was determined.

No soil quality baseline has been determined in the area of the future the TS and RWMC.

Surface and Groundwater

The location of the future Center is in the valley of Banjički stream, just before its inflow into the river Lim or Potpeć Lake. The water analysis of Banjički stream from 3 samples was taken from the Study on Environmental Impact Assessment of the Sanitary Landfill Banjica from 2013. The "Potpeć" reservoir, about 20 km long, built on the Lim River is located in the vicinity of the future RWMC location. Potpeć Lake is about 250 m downstream (along the bed of Banjički stream) from the border of the complex, ie. about 400 m away from the nearest boundary of the landfill body. The whole complex is at higher ground level in relation to the road Bistrica - Priboj, which leads along the shore of the lake, so there is no danger of endangering the location of the high levels of the river Lim or Potpeć Lake.

The catchment of the drinking water source "Čelice" for the water supply of Priboj is located at a distance of about 800 m from the RWMC, at an altitude of 700 m above sea level, which is about 200 m higher than the location of the RWMC. About 60 m north of the location, passes a pipeline of raw water from this spring.

In the wider environment upstream from the location "Banjica", only in a part of the city area of Nova Varoš and Prijepolje, there is a built system of fecal and rain sewage. There are no sewerage systems built in the area of Zlatar, so wastewater is mostly discharged directly into

the nearest watercourses, or the existing septic tanks are pumped by motor cisterns that are emptied on agricultural land or directly into watercourses. Smaller permanent and occasional watercourses in this area, as well as the Lim River itself, ie. Potpeć Lake is polluted mainly by household waste, waste plastic, construction debris, and other types of waste.

Worker and Public Health and Safety

RWMC Banjica operates under the Serbian regulation pertaining workers and public health and safety, following the rule of law in sectors of public and occupational health and safety, traffic standards and safety.

Based on the limited information available, workers of the PUCs currently operating in relevant municipalities are mostly equipped with the PPE and other working equipment. However, there was no evidence that workers are provided with the PPE masks to minimize impact of air emissions and dust on their health.

Land Use

Based on available information, all the land for the landfill has already been acquired and belongs to the Banjica d.o.o. To the east of the landfill location is the access field road and mostly forest land in private ownership and under the management of J.P. "Srbijasume", and on the west and north side of the fence and the bypass road, there is agricultural land.

Social Issues

The location where the construction of the RC is planned is uninhabited. The nearest buildings of the surrounding hamlets / estates are about 800 m away, and the nearest settlement is Bistrica, about 2.5 km away. The only vulnerable group that could be affected by the project, indirectly through closure of local waste dump sites, are the informal waste pickers. Although the representatives of the PUCs in the four cities didn't report presence of informal waste pickers, they were spotted on the Priboj/Nova Varoš landfill during the Consultant visit.

4 EIA PROCESS

4.1 Conducted EIA Process

Environmental Study for Regional Waste Management Center of Nova Varoš (RWMC) Municipalities, Sjenica, Priboj, and Prijepolje Location "Banjica" has been prepared in March 2021. Furthermore, the Environmental Study for Transfer Station with Recycling Yard in the municipality of Nova Varoš has been prepared in July 2019. Both Studies are comprehensive documents, provide most of the relevant baseline conditions and define number of measures to be implemented before and during construction, as well as during operation.

However, Environmental Study for RWMC has been prepared separately from the impact assessment procedure prescribed by the Serbian Law on Environmental Impact Assessment. As per the available information, the author/owner of the Study has not officially requested from the authorities to determine the "scope and content of the environmental impact assessment study".

4.2 Public Consultations

There is no evidence how process was communicated with public and specific local groups. In line with the construction timeline, the Banjica d.o.o., with support from representatives of the respective municipalities, 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.

5 SUMMARY OF ENVIRONMENTAL AND SOCIAL POTENTIAL ADVERSE IMPACTS

Main identified impacts are presented in this chapter. More detailed impacts are presented in the Environmental and Social Appraisal Report (ESAR).

5.1 Impacts during construction phase

Magnitude of most construction impacts is low due to the fact activities will be performed in a limited area. Only activities that will be conducted outside the Project area, or where impacts may extend off-site are characterised with medium magnitude, i.e impact on groundwater and surface water. The exception is workers health and safety aspects due to high-risk work in construction and operation with construction machinery.

Significance of the impact is established by the portion of the environment and community that will be affected and potential level of impact. Most of the impacts' significance are assessed as low and medium. The majority of impacts during the construction phase are limited to the construction location where there is no housing. Following impacts are assessed as potentially high impact significance:

- Health and safety aspects of operations are with higher risks, where outcomes may be light and heavy injuries or fatalities (both occupational and community health and safety).
- Impact on surface water and groundwater as a result of the potential spillage during the construction phase, although low in magnitude, could potentially have high significance due to the potential of hazardous materials to significantly pollute surface and groundwater even in case of small spillages.

Most of the impacts are characterised as ***reversible***, due to the sheer nature of the impact, except the following:

- Excavation will be undertaken in the Project area which is on the construction land, and it is not used for agriculture purposes therefore expected impact is low;
- The location of the RWMC is in the valley of Banjički stream, which is a permanent watercourse of torrential character and the water potential of this stream is a significant impact on the surface and groundwater. Banjički stream will be regulated (pipeline will be constructed) and its natural course will be permanently changed. Furthermore, it is expected that the construction of the RWMC will permanently affect the flow of surface water, due to changing the flow of surface water from the catchment area above the RWMC and directing to the bypass channels around the sanitary cassettes.
- waste generation is irreversible, however, re-use of waste will be an option assessed once waste characterisation is performed;
- Spillage of pollutants and hazardous materials into ground and surface water. However, these are all small quantities and significant impacts on surface or groundwater are not expected.
- Construction works in the area of RWMC could have irreversible impact on biodiversity, especially if not managed properly
- Health and safety aspects of operations are with higher risks, where outcomes may be light and heavy injuries or fatalities.

- The volume of traffic will be especially increased during the construction of the RWMC and the operation of the TS, which will take place in parallel over a period of time. The Contractor should develop and implement a Construction Traffic Management Plan (CTMP) to minimize risk to road users as well as local communities. All drivers will be trained, and strict speed limits will be enforced. An Emergency Preparedness and Response Plan (EPRP) will be in place for the project, before start of construction of TS and RWMC. It should include measures and procedures to manage any traffic and waste transport related emergencies.

Extent of impacts is mostly localized on the construction site.

Generally, the **duration** of these impacts is limited to the construction phase, except for the impact on surface waters.

5.2 Impacts during operation and maintenance

Magnitude of most operation and maintenance impacts will be low and performed on the limited area, mostly within the RWMC, previously on the TS. The exception is traffic safety management during operation which is recognized as medium magnitude, as it goes out of the immediate area of the RWMC. Collection and transport of waste generated in the region will have an effect on traffic safety on local roads.

Significance of the impact is established by the portion of the environment and community that will be affected or the scale of possible effect.

Due to the limited scale of the Project, most of the impacts will be low to medium significance. The majority of negative impacts during operation are limited to the operation site, given the Project area is located away from the nearby communities (18.5 km from Nova Varoš, 12.5 km to Prijepolje, 16.5 km to Priboj, and about 48 km to Sjenica), and in the area where there are no sensitive receptors in the immediate vicinity (schools, kindergartens, hospitals, culture and entertainment centres, etc.).

Following impacts are assessed as ***medium significance***:

- Surface and groundwater pollution due to accidental spillage of hazardous materials/fuels/lubricants. Although these types of accidents could possibly have significant impact, these are all small quantities and significant impacts on surface or ground water is not expected. Therefore, it is assessed as low/medium.
- Possible negative impacts with medium significance on the environment and human health could occur due to inadequate management of different types of waste during TS and RWMC (sanitary landfill, recycling center and composting plant) operation (mixed municipal waste, metal and other recyclable waste, hazardous waste in mechanical treatment processes, sludge from the wastewater treatment process, biodegradable part of waste after composting treatment and waste from grease and oil separator precipitators);

High significance is allocated to following impacts

- Access of affected communities to safe disposal of municipal waste.

- Similar to already stated under construction impacts, it is expected that the construction and operation of the RWMC will permanently affect the flow of surface water, due to regulation of the Banjički creek, changing the flow of surface water from the catchment area above the RWMC and directing to the bypass channels around the sanitary cassettes
- Overall positive impacts on the environment as a result of project implementation.
- Potential impact of occupational health and safety incidents during operation and maintenance could be assessed as high depending on the severity of the injury. However, implementation of OHS national legislation requirements, as well as international and good industry OHS standards, should limit the possible impact on occupational health and safety.
- Possible impact on traffic safety management on local roads during operation of the RWMC (sanitary landfill, recycling center and composting plant) and TS (collection and transfer/reloading of collected waste) is assessed as high, due to the level of expected waste transport traffic and sensitivity of recipients (all community members regarded as sensitive). Through adequate traffic management, education of waste truck drivers and affected communities these impacts are expected to be controlled.
- potential environmental (and safety) impact from inadequate leachate collection and treatment (or lack of) could be high.

When it comes to ***reversibility*** of the impacts, number of possible impacts are regarded as irreversible:

- Waste generation is irreversible; however, it can be limited if waste is re-used;
- Pollution caused by the spillage of pollutants and hazardous materials into ground and surface water. Accidental spillage of fuels or lubricants stored in workshops (if there will be on-site vehicle maintenance) or from malfunctioning, although of accidental nature and low magnitude can have an irreversible impact on the environment. As already mentioned, these are all small quantities and significant impacts on surface or groundwater are not expected;
- However, inadequate management of sanitary sewage, leachate, wash-off from the RWMC plants maintenance and oily atmospheric water could lead to irreversible impacts;
- Although occupational health and safety aspects are of lower risks compared to those identified during construction, OHS incidents have the potential to be irreversible (fatality or disability) if OHS risks are not adequately managed;
- Similar to the above, possible impacts of lack of landfill gas control, as well as control and treatment of leached from the sanitary cassettes (if not constructed before the start of operation in line with relevant standards) are assessed as irreversible.
- Impact to surface water in the area, i.e. Banjički stream and catchment area as already described, will be permanent.

Extent of impacts is mostly localized on the operation site, except when it comes to traffic safety management on local roads, related to the collection and transport of waste to the RWMC and TS. The Operator should develop and implement Operation Traffic Management Plan (OTMP) as a part of the Operation E&S Management Plan, to minimize risk to road users as well as local communities. All drivers will be trained, and strict speed limits will be enforced.

An Emergency Preparedness and Response Plan (EPRP) will be in place for the project, before start of operation of TS and RWMC. This will include measures and procedures to manage any traffic and waste transport related emergencies.

Also, positive impacts to affected communities range from local to regional, improving access to services related to safe management of communal waste.

Generally, **duration** of these impacts is mostly associated with the life of the Project. At this point there is no information how long this phase will last. Some of the impact's duration is assessed as limited/accidental due to their accidental nature, while impact on Banjički stream will be permanent.

6 SUMMARY OF ENVIRONMENTAL AND SOCIAL MITIGATION AND MANAGEMENT MEASURES

This chapter outlines feasible cost-effective measures to avoid, minimize, mitigate or compensate for environmental and social impacts to acceptable levels and address other environmental and social issues.

6.1 Construction phase

This phase of the Project development foresees the construction of new facilities (Contractor). This phase is expected to be implemented by the Public Utility Company Regional Sanitary Landfill Banjica (RSLB), Project Implementation Unit (PIU), and support from the Ministry and City Administration Nova Varoš (CANV).

Obligations PIU/RSLB:

- Establish ethical wall in permitting processes, to avoid conflicts of interest, given CANV is both investor and permitting authority in this Project;
- In Call for Proposal (CfP) for Engineer and Contractor, it is necessary to include all E&S requirements (as defined in the Environmental Study, the ESAP; and Environmental Impact Assessment yet to be developed and approved through procedure prescribed by the national legislation);
- Establish monitoring and supervision of the implementation of Occupational Health and Safety measures, in line with applicable OHS regulation during construction and operation;
- Ensure construction of TS and RWMC in line with national and international standards;
- Ensure safe disposal of generated waste in sanitary cassettes in line with applicable environmental regulation;
- Ensure in the shortest possible time the development of missing project documentation, especially Environmental Impact Assessment Study in line with national legislation;
- Supervise the implementation of community safety and security measures during construction;
- Inform the public of environmental and OHS measures and monitoring results during construction work and preparatory works;
- Biodiversity survey of the area should be undertaken to inform biodiversity baseline, identify and map critical habitat and PBF, and define Biodiversity Management Plan before the start of construction activities.
- Allocate budget for the above services.

PIU/RSLB shall also be responsible for the following:

- Implementation of the requests for environmental protection provided by: State environmental authorities, Lenders and other institutions, Law on Environmental Protection ("Official Gazette of the RS", No. 135/04, 36/09, 72/09, 43/11, 14/16, 76/18 and 95/18);

- Implementation of the ESHS requirements in procurement documentation, ToR for preparation of project documentation, construction and construction contract specifications;
- Environmental monitoring supervision via independent consulting services for environmental monitoring;
- Preparation of relevant (at least annual) reports on progress of implementation of environmental and health and safety (and social) requirements (national, international, Lenders, good international practice).

The Contractor is obliged to:

- The contractor will be responsible for implementing environmental and health and safety mitigation measures during preparation and construction works
- The Contractor should appoint environmental and health and safety specialist(s) who will be responsible for the day to day implementation and management of the Contractor's environmental and health and safety responsibilities;
- Establish environmental monitoring "zero stage baseline monitoring" (baseline for soil, air quality, noise, surface and groundwater quality) prior to the start of the works at RWMC, during the mobilization stage;
- Prepare the Contractor's Site-Specific Environmental and Social Management Plan (CESMP). CESMP to define detailed mitigation measures in line with requirements of Environmental Study, ESAP, Environmental Impact Assessment yet to be developed and approved through procedure prescribed by the national legislation; construction contract, EU Directives, Lender's requirements and good international practice;
- CESMP to include following sub-plans and procedures as a minimum: Organizational structure, roles and responsibilities for ESHS management; Labour Management Plan; Waste Management Plan; Pollution Prevention Plan; Biodiversity Management Plan; OHS Management Plan; Community H&S Management Plan; Design change procedure/plan; Supply chain Management Plan/procedure; Monitoring Plan; type of reports and reporting frequency.
- Biodiversity Management Plan to be developed before the start of the construction phase, in line with findings of the biodiversity baseline surveys;
- The Contractor to prepare as a part of the CESMP or as a stand-alone document Health and Safety Management Plan
- The Contractor will be responsible to develop Emergency Preparedness and Response Plans in line with requirements and risks identified in the Environmental Study, ESAP and Environmental Impact Assessment yet to be developed and approved through procedure prescribed by the national legislation, before the commencement of works. Emergency Preparedness and Response Plan should be submitted to the independent Project Supervision Consultant for approval;
- Contractor shall perform all project activities following the Health and Safety Management Plan, national legislation and Lender's requirements regarding health and safety;
- Ensure safe disposal of generated waste in line with applicable environmental regulation;
- Pursuant to Article 109 of the Law on Cultural Heritage ("Official Gazette of the RS", No. 71/94, 52/11 (other law), 99/11 (other law)), the obligation of the Contractor and the Project is to, if he encounters an archaeological site or archaeological

objects, he shall immediately stop the works and inform the competent Institute for Protection of National Monuments and take measures so that the find is not damaged, destroyed and preserved at the place and position in which it was discovered.

- In accordance with the provisions of the Law on Waters ("Official Gazette of the RS", No. 30/10, 93/12, 101/16 and 95/18 (other law)), it is prohibited to discharge untreated wastewater into the environment and the final recipient
- The Contractor will ensure that the budget for implementation of the required mitigation measures and monitoring activities defined in CESMP is included in Project costs as a separate item.

6.2 Operation and maintenance phase

This phase of the Project development foresees the operation of the RWMC and associated maintenance. This phase is implemented by Public Utility Company Regional Sanitary Landfill Banjica (PUC RSLB).

PUC RSLB /Operator:

- Operator to establish Operations Management System in line with the internationally recognized standards (ISO standards 14001 and 45001 and its required documents, plans and procedures). Certification is not mandatory.
- Develop Operations Environmental and Social Management Plan (OESMP), which will include all necessary environmental and health and safety sub-plans/procedures before the start of operation.
- OESMP to include as a minimum following sub-plans and procedures: Waste Management Plan; Soil and groundwater contamination monitoring and management; Leachate treatment and monitoring; Pollution Prevention Plan; Biodiversity Management Plan; OHS Management Plan; Traffic Management Plan; Community H&S Management Plan; Security personnel requirements; Grievance mechanism; Information disclosure and stakeholder engagement; E&S Monitoring Plan.
- As a part of the Operations Management System, the Operator will establish Safety Management System which will ensure preparation and implementation of Emergency Preparedness and Response Plans in line with requirements set out in Environmental Study, ESAP, Environmental Impact Assessment yet to be developed and approved through procedure prescribed by the national legislation and under respective national and EU legislation.
- Operations Safety Management System and Emergency Response Plans will ensure coordination and communication between RWMC and relevant regional and national authorities in case of accidental situations.
- Develop organizational structure for the operations phase which will ensure that Operator will appoint experienced waste management, environmental and health and safety specialists, who's responsibilities will be implementation of the Operations Management System and all its pertaining parts.
- Waste management planning in the Regional Waste Management Center should be in line with the Waste Management Strategy

- Establish regular environmental monitoring (air quality, noise, surface and groundwater quality, and soil quality) and update Monitoring Program of RWMC, in line with applicable environmental regulation;
- In accordance with the provisions of the Law on Waters ("Official Gazette of the RS", No. 30/10, 93/12, 101/16 and 95/18 (other law)), it is prohibited to discharge untreated wastewater into the environment and the final recipient
- It is obligatory to regularly, quarterly, test the quality of wastewater at the point of discharge, through accredited laboratories, which are obliged to sample and test the quality of several different samples and to issue an Opinion on wastewater quality based on the obtained results.
- The Operator is obliged to manage waste in accordance with the provisions of the national and EU legislation, including all requirements and measures defined in the Environmental Study, ESAP and Environmental Impact Assessment yet to be developed and approved through procedure prescribed by the national legislation.
- Allocate budget for the above services.

7 COMMUNICATIONS

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 – Banjica d.o.o. is key actor in the mechanism. Any person or organisation may send comments, complaints and/or requests for information in person or via telephone or email to the Regional sanitary landfill for municipal waste – Banjica d.o.o. The Company director and the president of the Assembly are in charge for addressing all complaints and forward the complaints submitted by the public.

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 implementation of the SEP is the overall responsibility of RWMS Banjica d.o.o and Contractor Grievances in relation to construction activities will be addressed together with construction contractors.

The grievance mechanism will be made public throughout the public consultation process, and will be maintained during preparation, construction and operation activities. Grievances will be monitored by Director of PUC Banjica Ljubenko Vasiljević.

The PUC Banjica may contact the grievant at a later stage to ensure that its activities continue to pose no further problems.

Grievance can be submitted in several ways:

- Send a completed Grievance Form to the address on the back of the form
- Contact the PUC Director Ljubenko Vasiljević
- Send an email to the indicated address: vasiljevic.ljubenko@gmail.co
- Call the PUC Banjica directly, on a confidential phone line at +381 69 3420531
- It is also possible to leave a completed Grievance Form in the PUC Mailbox.

As described above grievance process has several steps:

1. Receive a complaint
2. Grievance acknowledgement
3. Investigation of cause of grievance
4. Resolution of grievance
5. Follow up, if needed

Upon approval of the SEP, its location will be publicly announced.

www. envico.rs

Consultant:

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