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SEURECA  **VEOLIA**

REPORT

Stakeholder Engagement Plan of the RWMC Banjica, Nova Varoš

Client: EBRD and AFD

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

Title: **Stakeholder Engagement Plan of the RWMC Banjica, Nova Varoš**

Client: EBRD and AFD

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Content

List of figures	iv
List of tables.....	v
Abbreviations and acronyms	vi
1 INTRODUCTION	7
2 STAKEHOLDER ENGAGEMENT PLAN.....	10
2.1 The Project location and areas subject to impact	10
2.2 Record what the Project is legally required to do regarding disclosure and consultation	12
2.3 Identification of stakeholders	13
2.4 Report on any previous consultation and disclosure activities.....	15
2.5. Stakeholder engagement plan.....	17
2.6. Pre-Construction Phase	18
2.7. Construction	20
2.8. Operation.....	22
3 GRIEVANCE REDRESS MECHANISM	23
4 MONITORING AND REPORTING ACTIVITIES FOR THE STAKEHOLDER ENGAGEMENT PROCESS	25

List of figures

Figure 1 Location RWMC Banjica	8
Figure 2 Map of the RWMC Banjica and the current unsanitary landfill	11
Figure 3 Organizational structure of waste management system	15

List of tables

Table 1 Project Phases	9
Table 2 The list of stakeholders.....	13
Table 3 Stakeholder Engagement Plan for Pre-Construction Phase.....	18
Table 4 Stakeholder Engagement Plan for the Construction Phase.....	20
Table 5 Stakeholder Engagement Plan for the Operation Phase.....	22

Abbreviations and acronyms

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

1 INTRODUCTION

The 4 municipalities formed the Banjica Sanitary Landfill Company, which is responsible to design, build and operate the Banjica Sanitary Landfill (Figure 1). The future RWMC Banjica is located in the Nova Varoš municipality, about 400 m away from Lake Potpeć, and 500 m above sea level. The terrain is sloping towards the lake, and on the other side, the location is protected by the surrounding hills. The location itself is not inhabited. The nearest estates are about 800 m away, and the nearest settlement is Bistrica, about 2.5 km away.

According to 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 "Banjica" location is one of 4 locations that are part of this intervention. Regional waste management center (**RWMC) Nova Varoš "Banjica"** covers 4 municipalities and estimated cost is 8 MEUR. This investment is foreseen for construction of a regional waste treatment center including a sanitary landfill, a mechanical biological treatment (MBT) and a composting facility.

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.

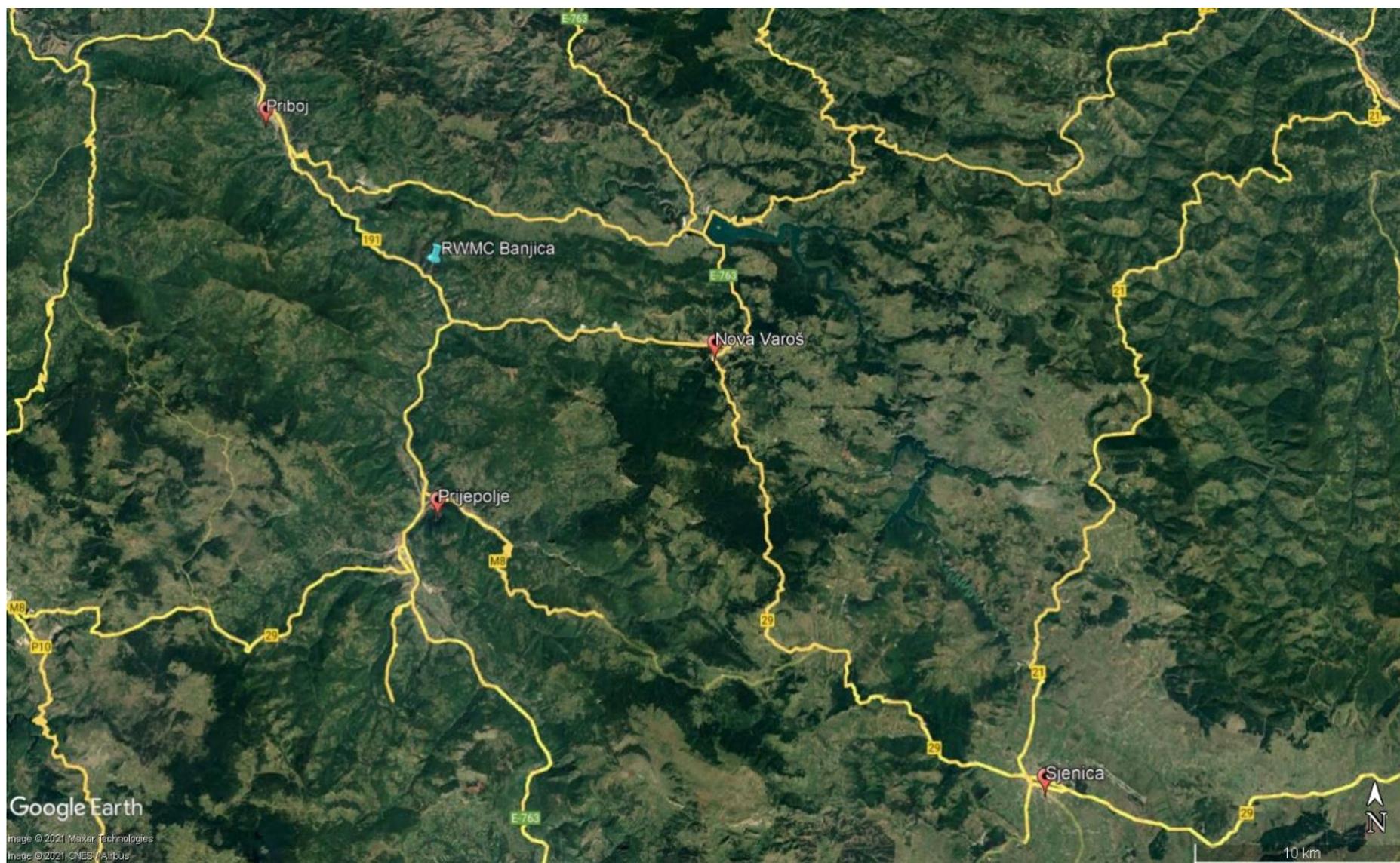


Figure 1 Location RWMC Banjica
(Source: Google Earth)

The latest RWMP of the RWMC 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 RWMC
- The other 3 municipalities will bring waste directly to the RWMC
- 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 (cca. 2,650,000,00 EUR)

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.

Main aim of Stakeholder Engagement Plan (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

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 Nova Varoš RWMC is located in the Southwestern part of Serbia, in the district of Zlatibor, which is a mountainous region (Figure 2). It consists of four municipalities: Nova Varoš, Priboj, Prijepolje and Sjenica and covers an area of 3,020 km², the largest municipality in the region being Sjenica with 1,059 km², and the smallest, Priboj with 552 km².

The location has 2.6 ha, it is planned for 20 years of operation, it is located near Bistrica in the mountainous part, ie. in the bay Duboki Dol. It is located on the territory of the municipality of Nova Varoš near the border with Priboj and Prijepolje. The location "Banjica" on the territory of the municipality of Nova Varoš along the highway Nova Varoš-Priboj was selected as the most favorable based on the study. The site selection study was carried out by the Kirilo Savić Institute, as well as the conceptual and main projects in December 2005 and the Environmental Impact Assessment Study in April 2006. The technical control of the projects was done by "Urbanprojekt" from Čačak, in January 2006. The consent to the Environmental Impact Assessment Study was issued by the Municipality of Nova Varoš in April 2006.

This regional waste management area plans to construct a RWMC that will consist of a sanitary landfill, a secondary waste separation line and a composting facility.



Figure 2 Map of the RWMC Banjica and the current unsanitary landfill

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, 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' grievances¹. 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

¹ 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 (Table 2). 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 The list of stakeholders

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 Nova Varoš ▪ Municipality of Priboj ▪ Municipality of Sjenica ▪ Municipality of Prijepolje ▪ Javno Komunalno Preduzece LIM ▪ Javno Komunalno Preduzece "3. Septembar" Nova Varoš ▪ Javno Komunalno Preduzece "Usluga" Priboj ▪ Javno Komunalno Preduzece "Vrela" Sjenica ▪ Sanitary Landfill Banjica, LLC 	High	High	High

Stakeholder group	Level of interest	Level of influence	Level of power
Affected Population: ² <ul style="list-style-type: none"> ▪ Inhabitants of the selected municipalities ▪ Enterprises as a part of chain in waste management system 	High	Medium	Low
External Stakeholders like <ul style="list-style-type: none"> ▪ CSOs dealing with ecology ▪ Touristic organization especially in Nova Varoš ▪ Media (regional one like RTV Priboj or national one) 	High	Medium	Medium

According to Feasibility study globally, the population is not endangered by the implementation of the Project, on the contrary. The only indirect negative impact of the project realization can have on reduce the population of members of the Roma population whose source of income is informal collection waste from the existing nearby "wild" landfill, and other similar landfills in all 4 municipalities, which will be removed / closed. Given that the informal waste pickers sell collected waste to recycling companies, by building the Center they remain without a basic source of income, as access will be strictly prohibited and waste collection at the planned regional sanitary landfill within Center (see previous footnote).

Special focus will be on communication and consultation with local population from village Bistrica (around 800 inhabitants) focusing on environment parameters: quality of air, water, level of noise.

Current waste management in the region is the responsibility of individual municipality Public Utility Companies (PUC) (one PUC per municipality). The local PUCs are 100% owned and controlled by respective municipalities. Bodies of the public utility companies are Supervisory Board (three members appointed by municipal assembly) and CEO (General Manager) selected in a competitive process.

Sanitary Landfill Banjica was established in August 2013 as a **Limited Liability Company** for solid waste management on the territories of the municipalities Nova Varoš, Priboj, Prijepolje and Sjenica. Official seat of the company is in Nova Varoš. Part of the assets of the company are also eight land lots designed/planned for landfill. Each of the founders/shareholders is owner of the 25% of the shares. Bodies of the limited liability company are Stakeholders Assembly and General Manager (CEO).

Operations of the regional company were burdened with difficulties from the very beginning as some municipalities (mostly Priboj and Sjenica) initially refused to participate in the financing of the joint company so regional company at some point was unable to finance the wage of the acting director (only director has been so far full-time employee). Political

² Formal and informal waste pickers engaged on non-regulated landfills are not recognized and precisely described by local respondents, there are no data on vulnerable groups that could be affected.

instabilities and rivalry between four municipalities caused poor functioning of the regional scheme. Municipality of Nova Varoš budget manage and finance this company, other three municipalities - members of the regional company do not contribute to its operations and the company has substantially lost its regional features.

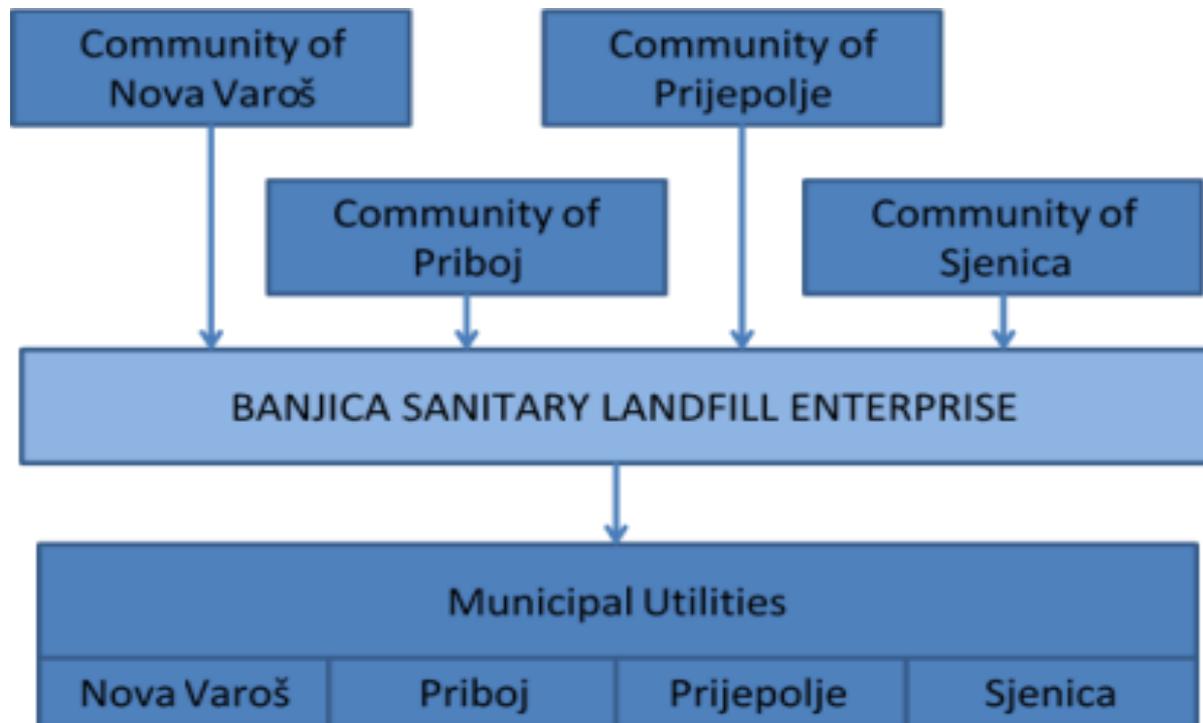


Figure 3 Organizational structure of waste management system
(Source: Inception Report Seureca/Envico 2021)

2.4 Report on any previous consultation and disclosure activities

The Regional Waste Management Plan is a document that organizes the waste management process at the regional level. The Law on Waste Management ("Official Gazette of the RS", No. 36/2009, 88/2010, 14/2016 and 95/2018 - other law) defines the obligation to develop local and regional waste management plans that should be mutually harmonized and harmonized with the Waste Management Strategy.

The Municipality of Prijepolje has signed an agreement on starting the development of a regional waste management plan for the municipalities of Prijepolje, Priboj and Nova Varoš, and the municipality of Sjenica has joined the agreement. The Decision on the development of a regional waste management plan in the municipalities of Prijepolje, Priboj and Nova Varoš ("Official Gazette of the Municipality of Prijepolje", No. 11/10) and the Decision on the development of a regional waste management plan in the municipalities of Prijepolje, Priboj, Nova Varoš and Sjenica ("Official Gazette of the Municipality of Prijepolje")

The development of the Regional Waste Management Plan for the municipalities of Prijepolje, Nova Varoš, Priboj and Sjenica is the result of a series of activities initiated in order to address the issue of waste management and the establishment of a Regional Center for Waste Management.

Initial activities, which resulted in the signing of the Agreement on Joint Waste Management, which was signed by all municipalities: Prijepolje, Nova Varoš, Priboj and Sjenica, number 353-1853 on October 8, 2005. and their assemblies (all except Sjenica) made a decision on the construction of a joint regional landfill at the location "Banjica" on the territory of Nova Varoš.

There is no evidence how process was communicated with public and specific local groups.

Municipalities bought the land. This process is not described or there is no data about effects on local inhabitants and no evidence on consultation process. The building permit was obtained, and the construction of the landfill body started. With the financial help of the Environmental Protection Fund, construction works have been started on the arrangement of the landfill body. The construction of the landfill "Banjica" was interrupted in 2009 because it was necessary to adjust the project-technical solution and the projected technological procedure, in the meantime, to the changed national regulations in this area, which are in line with the current EU regulations. With the help of the Ministry of Environment, Mining and Spatial Planning and foreign donors, in 2011, an activity of redesigning the existing documentation was launched. The regional waste management plan was developed by the municipalities with the technical assistance of the Municipal Support Program IPA 2007 - Good Governance, Planning and Service Delivery (SME IPA 2007) funded by the European Union.

For the purposes of drafting the Regional Waste Management Plan by the mayors of Prijepolje, Nova Varoš, Priboj and Sjenica, a coordination team and working groups were formed with the task of preparing the Regional Plan and defining the goals of waste management.

This idea was recalled through and defined in the Waste Management Strategy of the Republic of Serbia 2010-2019.

Decision on joint provision and implementation of waste management (No. 353-5076/2018, June 2018), it is defined that the municipalities of Nova Varoš, Prijepolje, Priboj and Sjenica of the local self-government unit that disposes of waste at the Regional Sanitary landfill "Duboko" Uzice, with transshipment at the transfer station in Nova Varoš.

The task of the project is to develop technical and technological solutions for the construction of a modern transfer municipal solid waste stations with a state-of-the-art recycling yard technology, which are applied in EU countries, at a selected location in the municipality of Nova Varoš.

The present waste management situation in the Banjica region is complex and the steps for further development approach are not clearly defined or agreed between the stakeholders. The previous partially implemented projects in landfill construction and waste separation add to the challenges. It is likely that a major change in approach is necessary and to do that a strong **technical justification will be required.**

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.

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.

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 consultation with local touristic organizations in order to avoid any misunderstanding and opposite plans to local touristic plans and potential tourist locations.

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 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 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 ³	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	At the beginning of preconstruction phase	Contractor 4 municipalities	Leaflets Public debates Public campaign	Discussion during public debates	Notes
Notify stakeholders on the implementation Program	All	30 days after formal approval of the Project. One-off	Banjica doo	Announcement on website of all municipalities and respected web sites., at premises and main public places of the affected municipality. Local liaison officer in 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

³ 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 ³	Stakeholders	Timing and Frequency	Responsibility	Communication / Media tool	Opportunity for Stakeholder Comment	Records
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
Grievance Mechanism	All public and stakeholders in 4 municipalities	30 days after formal approval of the Project	Banjica doo	Public notice boards and official correspondence by authorities and organizations. Distribution of Public Grievance Forms on public notice boards in the affected local communities and on the local communities' websites, during consultation meetings. All respective websites		Notification of Grievance Mechanism disclosure as published in affected municipality and websites and other advertising areas

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	Projectaffected persons from 4 municipalities, general public, stakeholders	At least starting from 30 days prior to construction.	Contractor(s) Banjica, municipalities	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 4 municipalities	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 Banjica Company	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers' website 4 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 Touristic organizations	Semi-annually	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	Banjica cooperation 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 Banjica 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 Banjica doo	Contractors' grievance /liaison officer Banjica website, official correspondence, massmedia, local noticeboards and premises of 4 municipalities.	Contractors' grievance /liaison officer Banjica website
Keep stakeholders informed on any operation -related activities that might affect them (e.g., notify stakeholders changes in the fee amounts for waste collection and disposal)	General public Local /regional/ national authorities	From commencement of operation phase and on going	Banjica Company	Mass media. Banjica 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 – Banjica d.o.o. 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 – 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.

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 – Banjica d.o.o 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 – Banjica d.o.o. 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 (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 Banjica doo 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
- Contractors progress reports include summary of the grievance mechanism (summary of new grievances recorded and update on the resolution of existing grievances)
- Annual reports on the implementation of the SEP and grievance process as part of annual report of the Company need to be publicly available.



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