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SEURECA  **VEOLIA**
REPORT

**Stakeholder
Engagement Plan of the
RWCM Srem-Mačva,
Sremska Mitrovica**

Client: EBRD and AFD

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Title: **Stakeholder Engagement Plan of the RWCM Srem-Mačva,
Sremska Mitrovica**

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Abbreviations and acronyms

A&A	Description
AFD	The French Development Agency
OHS	Occupational Health and Safety
CSO	Civil Society Organization
EBRD	The European Bank for Reconstruction and Development
FP	Fire protection
IPAM	Independent Project Accountability Mechanism
LLC	Limited Liability Company
LO	Liaison Officer
MoEP	Ministry of Environmental Protection
MoF	Ministry of Finance of Republic of Serbia
NES	National Employment Service
PIU	Project Implementation Unit
PUC	Public Utility Company
PRs	Performance Requirements
RS	Republic of Serbia
RWMC	Regional Waste Management Centar
RWMP	Regional Waste Management Plan
SEP	Stakeholder Engagement Plan
SORS	Statistic Office of the Republic of Serbia

1 INTRODUCTION

The Srem-Mačva Regional Solid Waste Management Project involved the construction of a regional solid waste management centre (RWMC) to serve five municipalities from two districts (Sremska Mitrovica, Šabac, Šid, Ruma, Bogatić). A Regional Centre consists of an operational landfill and a built but not yet operational secondary selection plant.

This site is one of several sites that are part of the solid waste management system across the country that will be supported by Banks. 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 new facilities and procurement of new equipment at the RWMC Srem Mačva ("the Project").

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.

The initial plan of the RWMC is the construction of the following infrastructure for additional waste management and treatment:

- construction of cell 2, including rehabilitation of the non-sanitary landfill, leachate collection and treatment, landfill gas collection and treatment for cell 1 and 2 closure of cell 1,
- procurement of mobile equipment for landfill operation,
- procurement of containers and vehicles for primary separation of waste in Ruma.

All activities within this project will comply to the EBRD Environmental and Social Policy, as defined through the applicable Performance Requirements (PRs).

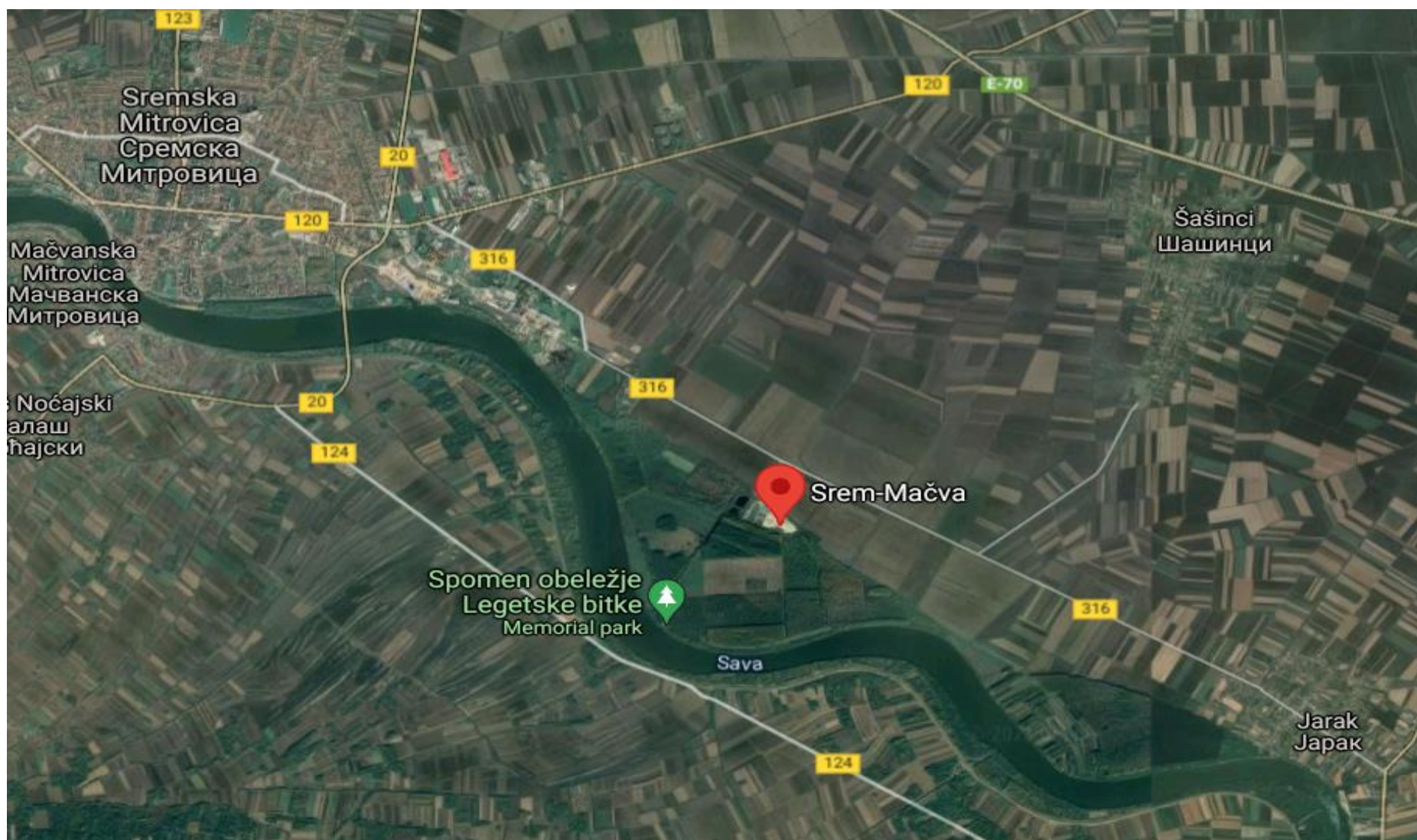


Figure 1 Location of RWMC Srem-Mačva
(Source: Google Earth)

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;
- 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 Srem-Mačva RWMC is located in western Serbia and includes 5 cities and municipalities from 2 Districts:

- Sremska District
 - Ruma
 - Šid
 - Sremska Mitrovica
- Mačva District
 - Bogatić
 - Šabac

Population of the 5 municipalities is decreasing and a negative natural increase rate has been recorded in all five cities (Table 2).

Table 2 Overview of RWMC population and surface area (SORS, 2021)

Municipality	Surface (km ²)	2011 Population	2021 Population	2020 urban population (%)	2020 rural population (%)
Bogatić	384	28,927	25,857	0%	100%
Ruma	582	54,398	50,732	57%	43%
Šabac	797	115,972	108,898	48%	52%
Šid	687	34,261	30,424	44%	56%
Sremska Mitrovica	762	80,014	74,299	53%	47%
Total	3,212	313,572	290,210	46%	54%

The Srem Mačva Regional Centre is located 9km from the municipality of Sremska Mitrovica. Its construction started in 2014 with the first cell of the sanitary landfill. Prior to the construction and operation of the Srem-Mačva Regional landfill, the municipality of Sremska Mitrovica disposed of its waste in the municipal non-sanitary landfill, "Jarak" within the current Regional Centre. The surrounding area, as well as the existing route (coast) of the Mančel Channel are covered with indigenous vegetation. The Mančel Channel is a regulated part of the stream Mančel that collects water from Fruška gora, which has the function of a drainage channel for areas of the irrigation system "Glac".

North of the location is agricultural land - arable land. South of the location is the forest Leget which separates the complex from the Sava River. In the West-Northwest there are industrial landfills for a sugar factory and a pulp and paper factory. The rest of the environment is agricultural land - arable land. Prior to the construction and operation of the Srem-Mačva Regional landfill, the municipality of Šabac disposed of its waste in the municipal non-sanitary landfill, "Dudara" which it was closed and rehabilitated. In the territory of the other three municipalities there are still non-sanitary landfills.



Figure 2 Location of landfill Srem-Mačva
(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 organised 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 points 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 organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

All projects should establish a formalised 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 organise the resolution of grievances,
- defined timeframes for acknowledgment 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.

In November 2006, the City of Sremska Mitrovica and the City of Šabac concluded a Cooperation Agreement related to the establishment of a Solid Waste Management Region, which subsequently was endorsed by the Šabac Parliament (Decision to endorse the Agreement, Municipality of Šabac 020-72/2006-14) and also by Sremska Mitrovica Parliament on 10 May 2007 (Decision to endorse the Agreement No 352-318/2007-I). In 2008 those two municipalities have established a comprehensive RWMP.

In March 2011, the two cities concluded an Agreement on the construction, management and use of a regional system for the management of municipal solid waste in the territories of the two cities. The agreement stipulates that the regional system consists of a sanitary landfill "Jarak" with accompanying infrastructure, a transfer station in Šabac and a waste separation plant.

In parallel, the municipalities of Ruma and Šid established a RWMP in 2007 with the Regional System of Indija, jointly with the municipalities of Indija Irig, Sremski Karlovci and Stara Pazova. The plan is now obsolete as Ruma and Šid are not part of the Indija RWMC anymore and are joining the Sremska Mitrovica RWMC.

2.3 Identification of stakeholders

PUC RWMC "Srem-Mačva" is in charge of building and improving the regional system of municipal waste management.

PUC Srem Mačva is currently operating the Regional Centre for Solid Waste Management and is also in charge of transporting waste from the Sabac transfer station to the Regional Centre. Sremska Mitrovica disposes of the municipal waste directly at the RWMC.

In June 2019 an agreement was signed with the Municipality of Bogatić for usage of the regional landfill. Ruma signed a similar contract in June 2021 and started to use the Regional Centre in January 2022.

Šid is expected to conclude a similar Agreement during 2022.

Municipal waste collection is performed by 5 different municipal PUCs in each of the municipalities:

- Bogatić: PUC "Bogatić",
- Ruma: PUC "Komunalac",
- Šabac: PUC "Stari Grad",
- Šid: PUC "Standard",
- Sremska Mitrovica: PUC "Komunalije".

There is currently no systemized primary selection of waste in one of the 5 municipalities. Through the 2017 IPA Program Sremska Mitrovica, Šabac, Bogatić and Šid will receive funds for establishment of source-separation of packaging waste. Through this project it is planned establishment of source-separation of packaging waste in Ruma.

Stakeholders will be presented in the table and assessed their potential level of interest (Table 3). 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 3 Identification of stakeholder

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"> ▪ Municipalities of Sremska Mitrovica, Šabac, Bogatić, Ruma and Šid ▪ PUC from all 5 municipalities ▪ Regional PUC Srem-Mačva 	High	High	High
<p>Affected Population:</p> <ul style="list-style-type: none"> ▪ Inhabitants of the selected 5 municipalities ▪ Enterprises as a part of chain in waste management system 	High	Medium	Low
<p>External Stakeholders like</p> <ul style="list-style-type: none"> ▪ CSOs especially ones dealing with ecology and vulnerable groups ▪ Touristic organizations ▪ Media 	High	Medium	Medium

2.4 Report on any previous consultation and disclosure activities

RWMC was founded in 2011, when the Assembly of the City of Sremska Mitrovica and the Assembly of the City of Šabac made a decision on the establishment of the PUC for the Regional Landfill "Srem-Mačva", with its headquarters in Sremska Mitrovica. In June 2019 an agreement was signed with the Municipality of Bogatić for usage of the regional landfill and in June 2021 with Ruma. Šid has not yet concluded the Agreement and it is expected during 2022. It is necessary to conclude the agreement with municipality of Šid.

There is no additional information about disclosure activities related to development of RWMP or sensibilization of general public for primary selection.

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 event need to be adopted. 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. Also, there should be organized campaigns and workshops about the significance of primary selection. All messages should be announced through various communication channels (such as websites, media, brochures etc.). In addition, PUC Srem-Mačva as well as local PUCs should share more detailed information about the project through their official website and other social media. Information about the project should be shared through municipality websites as well. This component is extremely important since primary selection is going to be established in all 5 municipalities.

Also, it is important to establish communication with relevant CSOs in all 5 municipalities. Focus should be put on CSOs dealing with ecology and vulnerable population such as Roma. CSOs dealing with ecology can be valuable partner in organization of campaigns for raising awareness of general public about importance of primary selection. On the other hand CSOs dealing with Roma can be partner in order to reach Roma population that will be affected after closure and remediation of non-sanitary landfills in Šid, Bogatić and Ruma².

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

² The only vulnerable group that could be affected by the project, indirectly through the closure of local waste dump sites/non-sanitary landfills, are the informal waste pickers. The available information obtained from RUC so far does not allow for an assessment of the number of informal waste pickers. In order to identify the number of informal waste pickers it is necessary to conduct a social baseline assessment. This assessment will be conducted prior to the closure of the official local dumpsites. In the case of Srem Mačva there are 4 (Sremska Mitrovica, Šid, Ruma and Bogatić) official dumpsites that will be closed, therefore should be included in this assessment. Assessment will be conducted during planned field visits or using a questionnaire that will be sent to all local PUCs in order to identify the number of informal waste pickers at existing dumpsites. If collected data shows that the closure of the existing dumpsites will affect the livelihood of informal waste pickers, in the next phase LARP for the improvement of the livelihood of informal waste pickers should be conducted.

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

2.6 Pre-Construction Phase

Table 4 Stakeholder Engagement Plan for Pre-Construction Phase

Activity	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 CSOs	At the beginning of preconstruction phase	PUC Srem- Mačva 5 municipalities	Leaflets Public debates Public campaign	Discussion during public debates	Notes

2.7 Construction

During construction the most important pointer is to notify local stakeholders of construction activities and changes to schedules. Aim for short response times in resolving grievances (Table 5).

Table 5 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, all other relevant stakeholders	At least starting from 30 days prior to construction.	Contractor(s) PUC Srem-Mačva	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	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 PUC Srem-Mačva	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 construction performance.	General Public CSOs dealing with ecology and Touristic organizations	Semi-annually	PUC Srem-Mačva Contractor	Local presentations with quest speakers Websites	E-mail address of PUC Srem-Mačva	Comments on the websites
Direct communication with CSOs representing vulnerable groups	Vulnerable groups	Semi -annually	PUC Srem-Mačva with local CSOs	<p>All channels of communication will be defined with local CSOs taking into account needs and specificities of vulnerable groups.</p> <p>Assistance will be provided in transportation to and from the venues.</p> <p>Simplified easy understandable brochures, using non-technical language will be prepared for information to be disseminated and disclosed.</p>	During the meeting, home visits, telephone calls	Systematized comments and suggestions from different meanings of communication

2.8 Operation

Table 6 Stakeholder Engagement Plan for the Operation Phase

Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
Clear announcement of transition of responsibilities and liabilities from Contractor(s) to PUC Srem-Mačva	Affected communities, other public utility companies General public.	At least starting from three months prior to termination of works	Contractor with PUC Srem-Mačva	Contractors' grievance / liaison officer PUC Srem-Mačva official website correspondence, mass media, local noticeboards and premises of 5 municipalities	Contractors' grievance / liaison officer PUC Srem-Mačva official 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	PUC Srem-Mačva	Mass media PUC Srem-Mačva official website Municipalities websites	As envisaged by national law

3 GRIEVANCE REDRESS MECHANISM

Since in SEP there is already developed grievance mechanism, during the continuation of RMWP same mechanism should be used. Special focus should be put on informing general public of existence of this mechanism through PUC Srem-Maćva official website, as well as websites of other 9 municipalities.

During the construction and operation anyone can raise a grievance with PUC Srem-Maćva. All grievances should be based on written forms (Annex I), which can be filled in by any affected person or organization and submitted to PUC Srem-Maćva. The PUC Srem-Maćva will look into all grievances officially received and within 15 days inform the author about taken actions. The acknowledgement will specify a contact person, their reference indicator and an anticipated target date for resolution.

In case when grievance is not connected to the PUCs activity, grievant will receive explanation in written form and grievance will not be further processed.

In all other cases the PUC will investigate whether they have failed to work to the intended standard and, if they have, identify measures which may be taken to prevent further occurrences. Upon resolution if the grievant considers the grievance to be satisfactorily resolved the PUC would appreciate sharing that with him/her by signing a Statement of Satisfaction.

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 Srem-Maćva.

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

The Grievance can be submitted in several ways:

- Send a completed Grievance Form (see appendix) to the address on the back of the form,
- Contact the responsible person for OHS, FP and environmental protection Jovan Kovačić,
- Send an email to the indicated address: office@srem-macva.rs or jovan.kovacic@srem-macva.rs,
- Call the PUC Srem-Maćva directly, on a confidential phone line at +381 22 810 099 or +381 62 758 193,
- 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.

The PUC Srem-Maćva will put special focus on the confidentiality and anonymity of the grievant and will not disclose it without consent. The exception will be only situations when it's not possible to approach the matter without revealing the grievant identity. However, even

in those cases persons responsible for resolving the problem, will in cooperation with grievant will discuss how that should be proceed.

The PUC Srem-Mačva doesn't encourage anonymous grievance, because it makes it more difficult to look into the matter, to protect the grievant position or to give feedback. In case when grievant insists on raising a concern anonymously, he will need to provide sufficient facts and data to enable the investigative team to look into the matter without his assistance.

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 PUC Srem-Maćva 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.

- SEP should be presented and available for the public to comment at official website of PUC Srem-Maćva,
- 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 15 working days from confirmation of receipt (noted in the 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.

5 ANNEX I - PUC SREM-MAČVA PUBLIC GRIEVANCE FORM

Table 7 Public grievance form

Srem-Mačva Reference No:	
Full Name	
Contact Information	By Post: Please provide mailing address:
Please mark how you wish to be contacted (mail, telephone, e-mail).	By Telephone: By E-mail:
Preferred Language for communication	Serbian English
Description of Incident or Grievance: What happened? Where did it happen? Who did it happen to? What is the result of the problem?	
Date of Incident/Grievance	One time incident/grievance (date) Happened more than once (how many times?) On-going (currently experiencing problem)
What would you like to see happen to resolve the problem?	

Signature:

Date:



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