

## **STAKEHOLDER ENGAGEMENT PLAN**

### **Management and Reuse of the Ashes/Slag from the Kragujevac District Heating Plant - Serbia**



## Contents

---

Contents .....	2
1 Introduction and Project Description.....	4
2 Objectives of the SEP .....	6
3 Regulatory Requirements for Stakeholder Engagement .....	7
3.1 Legislation of the Republic of Serbia.....	7
3.2 EBRD requirements .....	7
3.3 Gaps Between National and EBRD Requirements .....	9
4 Summary of Previous Stakeholder Engagement Activities.....	10
4.1 Regular communication with stakeholders .....	10
4.2 Consultation and Public Disclosure in Connection to the Project .....	10
5 Identification of Stakeholders and Communication Methods .....	11
6 Stakeholder Engagement Plan .....	12
6.1 Overview of activities .....	12
6.2 Roads Reconstruction Activities .....	14
6.2.1 Pre-Construction Phase Including the Adoption of the Design and Land Acquisition Process.....	14
6.2.2 Construction.....	16
6.2.3 Operation.....	19
6.3 Ash Management Activities .....	20
7 Public Grievance Mechanism.....	22
8 Implementation of Stakeholder Engagement Activities.....	25
8.1 Roles and Responsibilities .....	25
8.2 Recordkeeping.....	25
8.3 Monitoring and Evaluation.....	25
Appendix A.....	26
<b>Public Grievance Form.....</b>	<b>26</b>
A1 Public Grievance Form.....	27

## Abbreviation list

CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
E&S	Environmental & Social
EU	European Union
DH	District Heating
GLAC	Guide to Land Acquisition and Compensation
KPI	Key Performance Requirements
NGO	Non-Governmental Organisation
PAP	Project Affected Person
PIU	Project Implementation Unit
PR	Performance Requirement
PWC	Public Water Company
RS	Republic of Serbia
SEP	Stakeholder Engagement Plan

# 1 Introduction and Project Description

The Ministry of Environmental Protection (the “MoEP”) is planning the implementation of a district heating project in the City of Kragujevac (the “City”), which will support the replacement of coal boilers in a city centre heating plant (“District Heating (DH) Company Energetika” or “Energetika” or “the Company”), with new natural gas boilers of approximately 110 MW thermal power, and rehabilitation of the on-site ash stockpile site (the “Project”).

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) signed a loan agreement with the Government of Serbia for the Project of up to EUR 18 million to the Republic of Serbia is consisting of 2 Parts:

- the "Part 1" (committed) where up to EUR 15 million of loan was used for the replacement of boilers in a city centre heating plant, and
- the "Part 2" (uncommitted) where up to EUR 3 million is to be committed at Bank's sole discretion for management and reuse of the ashes/slag from the Energetika premises following completion of a due diligence process.

Part 1 is under implementation, while the Part 2 is currently at a preliminary design phase and is under-going due diligence by the EBRD.

This document, the Stakeholder Engagement Plan (SEP) describes the planned stakeholder consultation and engagement process for the Part 2 of the Project.

Part 2 of the Project foresees reuse of ash material from the on-site ash stockpile within Energetika for reconstruction of local (low traffic capacity) roads with site-specific environmental and social impacts that can be readily identified and addressed through effective mitigation measures.

The road projects being considered include:

- Reconstruction of the existing road in total length of 2.1 km in the direction of Bešnjaja.
- Reconstruction of the existing road Stragari – Kutlovo in the length up to 15,5 km.

As part of the Part 2 Project, the condition and current status of the off-site deposit sites used for depositing of ash produced by Energetika were investigated.

Two sites are yet to be fully rehabilitated and closed, will require meaningful stakeholder engagement. Their status is presented in the table below.

Name	Owner	Dates of Deposition	Tonnes deposited (footprint)	Current Status
Reomat	Energetika	September 2019 – December 2020	34,000 (2.45 ha) Max capacity of the location 50,000	Update of Rehabilitation Project / Plan has been developed and Decision to start landfilling obtained by the Ministry of Environmental Protection. Landfilling, profiling and any works on the rehabilitation has been stopped after grievances from the local community have been received.
Šupljaja Kamenolom	City of Kragujevac	January and February 2022	10,000 (unknown)	Former stone quarry. The City of Kragujevac dedicated this location for temporary storage of ash material, to be used for road construction/rehabilitation works of some local roads in its proximity.

				<p>Approximately 10,000t have been deposited before local Inspection of Directorate for Waters (Ministry of Agriculture, Forestry and Water Management) suspended the depositing and any further works at this location.</p> <p>This location is currently not in use. Rehabilitation Project/Plan is yet to be developed.</p>
--	--	--	--	--

The Project is categorised “B” in accordance with the EBRD Environmental and Social Policy (ESP) (2019).

The responsibility for implementation of the Part 2 Project is split between two entities - District Heating Company Energetika for issues related to the ash stockpile management, and the City of Kragujevac for the activities related to the reconstruction of the designated roads. Two main entities on behalf of the City of Kragujevac were identified as responsible for the Project activities, namely - Administration Department for Property Affairs, Urban Planning, Construction and Legislation responsible for the land acquisition process (if it turns out to be necessary) and the Administration Department for Investment responsible for management of investment projects delivered by the City of Kragujevac. In further text both entities will be referred to as “ the City of Kragujevac”.

Project Implementation Unit (PIU) for both Parts of the Project has been established, with representatives of Ministry of Environmental Protection, City of Kragujevac and Energetika named as members of PIU. PIU will facilitate all activities related to the Project and will have an overall responsibility over the stakeholder engagement process.

This SEP outlines a systematic approach to stakeholder engagement which will assist the PIU, District Heating Company Energetika and the City of Kragujevac to develop and maintain a constructive relationship with their stakeholders over time. The engagement procedures shall identify all stakeholders, be inclusive (not allow barriers of any kind to prevent from participation, like gender, ethnicity, age, etc.) and consider the needs of particularly vulnerable groups. The document also includes a grievance mechanism for stakeholders to raise any concerns about the Project.

PIU with support of Energetika and/or the City of Kragujevac in close liaison with other relevant institutions, governmental bodies, local governments, and affected communities and individuals as well as with other stakeholders to engage with them and ensure full disclosure of information and documents as defined by this SEP.

Stakeholder engagement and grievances management related to roads reconstruction activities will be managed by the Contractors’ nominated Grievance officer and overseen by the PIU. The Contractors’ responsibilities shall be clearly delineated and specified in the respective works contracts. Prior to construction, the public and local community will be informed, through the City of Kragujevac website and relevant local communities’ premises, about the Contractor’s contact information and Grievance officer.

The SEP will be periodically reviewed and updated by PIU, as important Project information becomes available.

## 2 Objectives of the SEP

---

The main objectives of stakeholder engagements are to:

- Ensure that adequate and timely information is provided to persons affected or likely to be affected (both directly and indirectly) by the project (“affected parties”) or that may have an interest in the project (“other interested parties”) or that have influence over the Project. Provide to these groups such forums and opportunities to voice their concerns and opinions,
- Ensure that comments are received in a timely manner so that they can be considered during the decision-making process.
- Establish effective communication and cooperation facilitating community support in general, and
- Establish an effective grievance and mediation mechanisms with the main goal to intervene in disputes in order to resolve and close out and minimize the number of cases referred to judicial authorities.

This SEP describes the approach in engaging with stakeholders, to be maintained throughout all Project components i.e.

- for reconstruction works - pre-construction including land acquisition (if it turns out to be necessary), reconstruction activities and operation.
- for ash management – on-site and off-site ash stockpiles management activities.

The table below identifies and summarizes the adopted phases of stakeholder engagement that guide this Project.

Table 1 Project components / phases

Phase	Status (Planned / Completed)
Pre-construction Phase including the land acquisition (temporary and permanent) process	Planned
Construction Phase	Planned
Operation	Planned
Ash Management	On-site ash stockpile management- planned Off-site ash disposal sites management - ongoing

## 3 Regulatory Requirements for Stakeholder Engagement

---

### 3.1 Legislation of the Republic of Serbia

Public disclosure and consultation procedures are organised under Serbian legislation in connection to the development and adoption of spatial and regulation plans for cities, municipalities, neighbourhoods. The most recent Serbian law which regulates these issues is the Law on Planning and Construction (Official Gazette of the RS No. 72/2009...9/2020).

There are several disclosure and consultation activities which must be undertaken before the adoption of a plan and they are:

- Informing the public through the media about details of disclosure of the draft plan/document (i.e. where the hard copy is available for review, the dates and time when it can be reviewed) and inviting citizens/organisations to submit comments and/or attend a public hearing. Citizens can request that their comments are responded to in writing;
- Organising a public hearing to present the draft plan/document (usually in the town hall or other appropriate local venue);
- Processing comments received from all stakeholders and revising the plan/document to reflect them, as well as preparing a report to justify why certain comments were not adopted;
- 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).

Activities on this project are not expected to trigger changes in the existing spatial plan nor will Strategic Environmental Impact Assessment be carried out and therefore, the engagement activities listed above will not take place.

PIU and the City Administration needs to comply with the Law on Free Access to Information of Public Importance (Official Gazette of the RS No. 120/2004, 54/2007, 104/2009, 36/2010) which regulates citizens' rights of access to information possessed, used or controlled by public bodies, sets out the principles and exceptions to these rights, as well as the procedures for their achievement and protection.

### 3.2 EBRD requirements

All projects financed by EBRD shall be structured to meet the requirements of the EBRD Environmental and Social Policy which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. 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.

PR10 promotes the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management of environmental and social impacts and issues.

The overall objectives of the PR 10 are to:

- Outline a systematic approach to stakeholder engagement that will help clients build and maintain a constructive relationship with their stakeholders, in particular the directly affected communities,
- Promote improved environmental and social performance of clients through effective engagement with the project's stakeholders,
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and to ensure that meaningful environmental and social information is disclosed to the project's stakeholders,
- Ensure that grievances from the affected communities and other stakeholders are responded to and managed appropriately.

The goal of consultation is to ensure that adequate and timely information is provided to interested parties and to those potentially affected by Project and policies that guide operations, and that these groups are given sufficient opportunity to voice their opinions and concerns.

Stakeholder engagement will be conducted on the basis of providing local communities that are directly affected by the project and other relevant stakeholders with access to timely, relevant, understandable and accessible information, in a culturally appropriate manner, and free of manipulation, interference, coercion and intimidation.

The stakeholder engagement shall be such to incorporate the following elements:

- Stakeholder identification and analysis,
- Stakeholder engagement planning,
- Disclosure of information,
- Consultation and participation,
- Grievance mechanism and
- Ongoing reporting to relevant stakeholders.

The project shall be driven by engaging stakeholders in a scoping process with interested parties and identified stakeholders at an early stage to ensure early identification of key issues to be addressed.

Regular reports to interested stakeholders shall be provided on the environmental and social performance as a separate publication. These reports shall be available and accessible to the affected communities.

Resources for public information and engagement should focus on affected parties with a particular attention to those that may be differentially affected by the project because of their disadvantaged or vulnerable status.

The EBRD PR10 requires that engagement continues during project implementation, meaning throughout the project cycle, and that a grievance mechanism is established to receive and facilitate resolution of stakeholders' concerns and grievances.



### **3.3 Gaps Between National and EBRD Requirements**

The national framework in Republic of Serbia is broadly compatible with the EBRD requirements of public consultation and stakeholder engagement but there still remain gaps to be addressed. The national requirements stay at the level of procedural engagement and do not tackle in depth meaningful and empowered consultation. Furthermore, the requirements are scattered across various documents and laws without sublimation even at sectoral level. The requirement of an effective procedure or mechanism by which people can make comments or raise grievances beyond the formal administrative and judicial grievance forums is also recognized as a shortcoming in the national framework comparing to the EBRD requirements.

Therefore, this SEP has taken into consideration all the requirements and has produced a plan that avoids duplication of processes, grievance mechanisms on one hand but on the other complies with the more stringent EBRD standards and requirements of stakeholder engagement.

## 4 Summary of Previous Stakeholder Engagement Activities

---

### 4.1 Regular communication with stakeholders

Responsibilities relevant for stakeholder engagement within Energetika are spread throughout multiple departments, including General Director, Marketing Department, and Legal, Administration and Human Resources Department.

The Stakeholder Engagement Plan for Part 1 of the Project was developed in June 2021 as part of the E&S Due Diligence for Part 1. Energetika has published SEP on their website and has the overall responsibility over the implementation of this plan.

Energetika currently has well-coordinated engagement with the following stakeholders:

- Their customers and city residents with the set procedure for submitting and resolving consumer complaints. Users have several avenues at their disposal for submitting complaints - in person at the counter at Energetika d.o.o. in Ulica Nikole Pašića 15; via email disclosed on the Energetika website; or online through the website template. Defects in the heating system and complaints regarding the quality of heating supply in the City can also be reported via phone number 336-238 or by calling the toll-free number 0800 034-033.
- City of Kragujevac Environmental Inspectorate and Ministry of Environmental Protection where ongoing cooperation between Energetika and these governmental institutions is mandated by law, and
- Press where Energetika provides press releases and information to the local media when required (e.g. for upcoming service changes of development projects). These are carried out through the local TV station, radio station, website and the Mayor Office.

Energetika also engages in an ongoing communication with the local community residing in the proximity of the ash disposal sites Energetika used in the past.

Energetika has several avenues for receiving grievances from the wider community and ways of communicating with its stakeholders (as described above). The Department for Legal, HR and Administrative Affairs is responsible for internal (employees) grievance management. However, currently there is no formalized mechanism in place that would allow the employees to submit their grievances in person or anonymously, nor there is a grievance log kept that would allow methodological track of the received grievances and their resolutions. Moreover, Project level Worker Grievance Mechanism that could be used by non-employee workers (from the procured works) is also undefined.

### 4.2 Consultation and Public Disclosure in Connection to the Project

Information regarding the Part 1 Project together with the promo video and SEP were published on Energetika website. With regards to Part 2, no announcements on project-specific information were published nor consultations with stakeholders groups that may be affected were organised so far.

## 5 Identification of Stakeholders and Communication Methods

Stakeholder groups that may be affected by and/or are interested in the implementation of the project are presented below. The objective of stakeholder identification, which is closely connected to the identification of impacts, is to establish which individuals and organizations may be directly or indirectly, positively or negatively impacted by the project and to bring them forward to the first line of information.

The stakeholder list can be changed in the course of the process of implementation. It shall therefore be regularly reviewed and updated throughout the project cycle. The risk associated with each stakeholder group can also be subject to changes and shall be reassessed from time to time. As a minimum, the Stakeholder list should be revised prior to commencement of the land acquisition process (if it turns out to be necessary), at the start of the construction phase and at the start of the operation phase.

Not all impacts target all stakeholders equally, as some can be either influenced by subjective internal or objective external factors. The Stakeholders have been classified into the following groups:

National Governmental Stakeholders – high interest, high influence, high power and the key high-level decision-making groups	<ul style="list-style-type: none"> <li>• The Government of Republic of Serbia</li> <li>• Ministry Environmental Protection</li> </ul>
Regional and Local Government Stakeholders – high interest, high local influence, high local power and locally important decision-making group	<ul style="list-style-type: none"> <li>• City of Kragujevac</li> <li>• City of Kragujevac Environmental Inspectorate</li> <li>• District Heating Company Energetika</li> <li>• Local community Stragari</li> <li>• Local community Kutlovo</li> <li>• Local community Gornja Komarica</li> </ul>
Affected Population, Enterprises and Public Service Facilities – high interest, low influence, low power, low to medium influence over the decision-making process	<ul style="list-style-type: none"> <li>• Owners of the potentially affected property (land and auxiliary structures for road reconstruction – if additional land acquisition is required)</li> <li>• Residents of the affected local communities where roads reconstructions are planned (Stragari, Kutlovo, Gornja Komarica)</li> <li>• Residents and businesses living adjacent to the road reconstruction work</li> <li>• Individuals of the general public living or working close to the Energetika premises.</li> <li>• Owners of land used for ash disposal from Energetika coal-fired boilers and communities around these disposal sites</li> </ul>

<p>External Stakeholders affected by construction – medium to high interest, medium influence, but are influenced by internal subjective factors</p>	<ul style="list-style-type: none"> <li>• Other Interested Parties – various interest and influence levels,</li> <li>• NGO<sup>1</sup>s</li> <li>• Local Media: <ul style="list-style-type: none"> <li>➢ Radio-television Kragujevac <a href="https://rtk.co.rs/">https://rtk.co.rs/</a>;</li> <li>➢ Weekly newspaper Kragujevacke <a href="https://www.kragujevacke.rs/">https://www.kragujevacke.rs/</a></li> </ul> </li> <li>• Prospective Contractor(s) and their workers</li> <li>• Prospective Supervision Engineer for supervision of construction works (if procured)</li> </ul>
<p>Vulnerable groups – high interest and higher risk of poverty, low interest, low power</p>	<p>Potentially:</p> <ul style="list-style-type: none"> <li>• Women: <p>The traditional ownership and title holding structure is still present in the Republic of Serbia, where men represent the absolute majority of title holders, while women become title holders prevalently by the right of succession. Because of this, there is always uncertainty to which extent will the women be involved in the disposal of the received compensation, which is why we recommend identifying them as potentially vulnerable groups in all cases that involve land acquisition.</p> </li> <li>• People with mobility issues that could be additionally enhanced by construction works: <ul style="list-style-type: none"> <li>➢ Elderly/Pensioners</li> <li>➢ Persons with disabilities</li> </ul> </li> <li>• Illiterate persons that would have difficulties to read information leaflets and compensation contracts</li> </ul>

## 6 Stakeholder Engagement Plan

### 6.1 Overview of activities

PIU in cooperation with Energetika and the City of Kragujevac will publish a grievance form and contact details for submitting grievances, on their official websites (<https://http://www.energetika-kragujevac.com//> and <https://www.kragujevac.rs//>).

When it comes to roads reconstruction activities, in line with the construction timeline, the PIU and City of Kragujevac, with support from representatives of the affected local community will organise meetings with the owners of affected property along the road sections where works will be carried out and local population living in the vicinity of the road rehabilitation works or planned access routes. The aim is to present the planned construction

<sup>1</sup> Currently no interested NGOs have been identified. However, this may change during the course of the Project.

works, safety risks (during construction and operation) and expected construction nuisances, as well as foreseen mitigation measures and the grievance mechanism. These meetings will also serve as platforms for potentially affected people to ask questions and provide suggestions for further mitigation measures. The meetings will be announced through the local media, on the Energetika and City of Kragujevac websites and as recommended by local communities representatives which would be consulted in advance (e.g. through letters, leaflets, announcements on bulletin boards, by phone). All documents and meetings related to stakeholder engagement will be delivered in Serbian language.

General project leaflets will be developed and disseminated to residents living or working in the affected communities, before the commencement of construction works. They will contain a brief, non-technical overview of the Project, dates when the works are expected to commence, possible construction related nuisances, a description of the grievance management procedure and contact details for submitting grievances.

If land acquisition is required, prior to the commencement of any acquisition/expropriation, in addition to the general project leaflet, a simple Guide to Land Acquisition and Compensation (GLAC) will be disseminated, which would, beside a general non-technical information regarding the Project also contain information on the land acquisition process including, cut-off date, compensation and other assistance, possible construction related nuisances regarding land occupation, a description of the grievance management procedure and contact details for submitting grievances.

The contractor will secure all construction sites prior to any construction activities taking place and will ensure appropriate construction and warning signs are in place.

The City of Kragujevac with support of PIU will continue to inform the public through their website, the media and in other appropriate ways on all significant project achievements and issues (environmental, H&S and social).

Other stakeholders, including traffic police, emergency health services, fire brigades, etc. will be informed about the planned construction works. The same applies to owners and operators of utilities (heating, telecommunications, water), who will be informed so that they can plan to make the repairs on their networks during construction, if necessary.

Regarding the ash management activities (both onsite and offsite Reomat and Supljaja disposal sites), Energetika with support of Kragujevac will be responsible for disseminating information on ash management to the affected communities. For specifics, please see Table 5 Stakeholder Engagement Plan related to Ash Management below.

PIU with support of the City of Kragujevac and Energetika will maintain records of all stakeholder activities performed including collecting records of Contractor's activities.

A detailed Stakeholder Engagement Plan for each of the Project component is presented in Tables 2-5 below.

## 6.2 Roads Reconstruction Activities

### 6.2.1 Pre-Construction Phase Including the Adoption of the Design and Land Acquisition Process

Table 2 Stakeholder Engagement Plan for Pre-Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
1.	Organize public consultations to present design solutions, potential land acquisition impacts, and provide the opportunity for the public to express their comments and concerns	All	Before adoption of the detailed design	PIU and City of Kragujevac	Announcement of meeting on website of the City of Kragujevac, at premises and main public places of the affected municipality. Mass media (local newspapers, TV channels, radio, social media) GLAC and general project leaflets with a brief, non-technical summary of the Project Consultations organized in the premises of affected municipalities with the application of prescribed measures Or Consultations organized in the open (locations to be defined as suitable) with the application of prescribed measures Non-Technical Summary of the Project will be made available in hard copy within Kutlovo, Stragari and Gornja Komarica communities.	Enquiries and comments via City of Kragujevac website or via customer service Response via official correspondence, e-mail.	Notifications as published in affected municipalities and websites Grievance and comments log Written correspondence with relevant authorities and organisations
2.	Notify stakeholders of the Implementation Program	All	30 days after formal approval of the Project. One-off	PIU and City of Kragujevac	Announcement on website of the City of Kragujevac at premises and main public places of the affected municipality.	Enquiries and comments via the City of Kragujevac	Press clippings Notifications as published in the affected

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
					Mass media (local newspapers, TV channels, radio, social media)	website or via customer service Response via official correspondence, e-mail.	municipalities and websites Grievance log
3.	Disclosure of the Land Acquisition Framework and Preparation and disclosure of a Land Acquisition Plan	Affected communities, Project Affected Persons (PAPs) (e.g. landowners, vulnerable groups etc.)	Disclosure and full implementation - Prior to commencement of the construction works	PIU and City of Kragujevac	Announcement on website of the City of Kragujevac, at premises and main public places of the affected municipality. GLAC and general project leaflets with a brief, non-technical summary of the Project LAP available on the websites of the City of Kragujevac and affected municipalities Hard copies available in the premises of the affected municipalities Mass media (local newspapers, TV channels, radio, social media)	Enquiries and comments via the City of Kragujevac website or via customer service Response via official correspondence, e-mail.	Press clippings Notifications as published in the affected municipalities and websites Grievance log
4.	Particular effort with regards to notifications including to affected landowners/users	Vulnerable groups/ persons	As defined in item no 1	PIU and City of Kragujevac	In addition to communication tools described above, vulnerable groups will receive house visits and/ or invitation to individual or small group meetings as agreed with the specific group/ individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non- technical language will	In addition to channels defined above, communication will be made available through direct phone lines and follow up agreed visits/meetings (within the next 7 days from each	As defined in the item 1

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
					be prepared for information to be disseminated and disclosed. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language by a knowledgeable person if needed	event) to allow the information to settle in and collect comments and concerns.	
5.	Grievance Mechanism	All	Prior to initiation of expropriation activities	PIU and City of Kragujevac	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 during consultation meetings. The City of Kragujevac site website	Enquiries and comments via PIU and the City of Kragujevac designated channels of communication. Response via official correspondence	Notification of Grievance Mechanism disclosure as published in affected municipality, the City of Kragujevac website and other advertising areas

## 6.2.2 Construction

During construction, the most important pointer is to notify local stakeholders of construction activities and changes to schedules. It should be also aimed for rapid response times in resolving grievances.

Table 3 Stakeholder Engagement Plan for the Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
6.	Disseminate information about anticipated construction activities to	Affected communities, PAPs (e.g. land owners,	At least starting from 30 days prior to construction.	Contractor(s), PIU and the City of Kragujevac	The City of Kragujevac website, official correspondence, mass media, local noticeboards and premises of municipalities, project leaflets	Grievance mechanism Contractors grievance /	Notifications as published in affected



No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
	affected communities.	vulnerable groups etc.), Public.			Community Liaison Officer (CLO) of Contractor	technical coordinator / CLO	communities and website Press clippings Written correspondence with relevant authorities and organisations
7.	Keep stakeholders informed of any project or construction-related activities that might affect them (e.g. notify stakeholders of water supply interruptions, road closures and diversions and any transport disruptions, construction schedule)	Road users, PAPs, affected communities, public and private sector enterprises affected by the Project footprint etc., Relevant local / regional / national authorities, General public	From commencement of works in frequent intervals for Stakeholders to get accustomed to receiving information	Contractor(s), PIU and the City of Kragujevac	The City of Kragujevac website, Official correspondence, mass media, local noticeboards and premises of local communities, project leaflets Community Liaison Officer of Contractor	Grievance mechanism Via Contractors CLO, through designated e-mail and phone Via information boxes to be installed at construction site As envisaged by national law	Notifications as published in affected communities and website Press clippings Written correspondence with relevant authorities and organisations
8.	Keep stakeholders informed of any project or construction-related health and safety issues (e.g. related to access to the construction site, open trench, etc.)	Road users, PAPs, affected communities, Public and private sector enterprises affected by the Project footprint etc., Relevant local / regional / national authorities, General public	Prior to the commencement of works	Contractor(s), PIU and the City of Kragujevac	The City of Kragujevac website Official correspondence, mass media, local noticeboards and premises of municipalities, project leaflets Community Liaison Officer of Contractor	Grievance mechanism Via Contractors CLO, through designated e-mail and phone Via information boxes to be installed at construction site	Notifications as published in affected communities and website Press clippings Written correspondence with relevant authorities and organisations

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
						As envisaged by national law	
9.	Keep stakeholders informed about local employment opportunities	PAPs, affected communities, public and private sector enterprises affected by the Project footprint etc., relevant local/regional/national authorities, General public	After closing the contract for construction works during mobilisation period and later as needed	Contractor, Local Employment office	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers website Local Employments office	Via Contractors website Via Contractors CLO	Notifications as published in affected communities and website
10.	Disclose information on project Environmental and Social construction performance.	PAPs, General Public	Semi-annually	Contractor	Contractor's website	-	Notifications as published on website
11.	Particular efforts with regards to activities from 4 through 9	Vulnerable groups/ individuals	As assigned to under each respective item	Contractor(s), PIU and the City of Kragujevac with assistance of external specialist as needed (sign language specialist, gender specialist etc.)	In addition to communication tools described in items above, vulnerable groups will receive house visits and / or invitation to individual or small group meetings as agreed with the specific group / individuals. Assistance will be provided in transportation to and from the venues. Simplified easy understandable brochures, print-out of salient features of documents, using non- technical language will be prepared for information to be disseminated and disclosed if turn out to be necessary. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language knowledgeable	In addition to opportunities listed in bullets above, communication will be made available through direct phone lines and follow up agreed visits / meetings (within the next 7 days from each event) to allow the information to settle in and collect comments and concerns.	As assigned to under each respective item

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
					person if needed will be present for hearing impaired persons		

### 6.2.3 Operation

Table 4 Stakeholder Engagement Plan for the Operation Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
12.	Disseminate information about transition of responsibilities and liabilities from Contractor(s) to the City of Kragujevac	Affected communities, Project affected persons, Roads users, General public.	At least starting from two months prior to termination of works	Contractor(s) with PIU and the City of Kragujevac	Contractors grievance / liaison officer City of Kragujevac website, official correspondence, mass media, local noticeboards and premises of local communities.	Contractors grievance / liaison officer City of Kragujevac website
13.	Keep stakeholders informed on any maintenance activities that might affect them	Roads users, local /regional/ national authorities, General public	Before commencement and during maintenance	PIU and the City of Kragujevac	Mass media. The City of Kragujevac website	As envisaged by national law
14.	Update stakeholder information	Roads users, PAPs, affected communities, public and private sector enterprises affected by the Project footprint etc., relevant local/ regional/ national authorities, General public	From commencement of works	Contractor	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers website	As envisaged by national law

## 6.3 Ash Management Activities

Table 5 Stakeholder Engagement Plan related to Ash Management

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
15.	Organize public consultation meeting to inform stakeholders about activities regarding the removal of the ash stockpile located within Energetika main premises (Zastava complex) and provide the opportunity for the public to express their comments and concerns	All	One month prior to beginning of works	PIU and Energetika	Announcement on website of Energetika and its premises and main public places in wider surroundings of the Zastava complex. Mass media (local newspapers, TV channels, radio, social media) Consultations organized in the Energetika premises with the application of prescribed measures Or Consultations organized in the open (locations to be defined as suitable) with the application of prescribed measures Non-Technical Summary of the Project will be made available in hard copy within Kutlovo, Stragari, and Gornja Komarica communities.	Enquiries and comments via Energetika website or via customer service Response via official correspondence, e-mail.	Notifications as published in affected communities and websites Grievance and comments log Written correspondence with relevant authorities and organisations
16.	Grievance Mechanism	All	Prior to initiation of ash removal activities	PIU and Energetika	Public notice boards and official correspondence by authorities and organizations. Distribution of Public Grievance Forms in Energetika premises and main public places in wider surroundings of the Zastava complex and during consultation meeting (above). Energetika site website	Enquiries and comments via PIU and Energetika designated channels of communication. Response via official correspondence	Notification of Grievance Mechanism disclosure as published on Energetika website and other advertising areas

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
17.	<p><b>For Reomat disposal site:</b></p> <p>Disclose information on changes of the existing Rehabilitation Plan, planned future activities and associated potential benefits, impacts and risks.</p> <p>Disclose information regarding the grievance mechanism</p>	Community in the landfill proximity	Monthly updates while the disposal site is in use and when the major changes in status and activities on site are expected.	Energetika	Energetika website, Official correspondence, mass media, local noticeboards and premises of local communities, project leaflets Community Liaison Officer of Contractor (if any)	Enquiries and comments via Energetika designated channels of communication. Response via official correspondence	Notifications as published in affected communities and websites Grievance and comments log
18.	<p><b>For Supljaja Kamenolom:</b></p> <p>Disclose information related to the Rehabilitation Plan (when prepared), responsibility over the disposal site (once decided), planned future activities and associated potential benefits, impacts and risks.</p> <p>Disclose information regarding the grievance mechanism</p>	Community in the landfill proximity	Monthly updates while the disposal site is in use and when the major changes in status and activities on site are expected.	Energetika and/or Kragujevac (when decided)	Energetika and City of Kragujevac websites, Official correspondence, mass media, local noticeboards and premises of local communities, project leaflets Community Liaison Officer of Contractor (if any)	Enquiries and comments via Energetika or City of Kragujevac (when decided who is responsible) designated channels of communication. Response via official correspondence	Notifications as published in affected communities and websites Grievance and comments log

## 7 Public Grievance Mechanism

---

Respecting the grievance panels and its authorities made available under the national legislation, a Project Specific Grievance Mechanism shall be designed for the Project. As previously mentioned, submitting grievances to Energetika is enabled through multiple channels. Any person or organisation may send comments, complaints and/or requests for information in person or via post, telephone or email using the contact information provided on Energetika website. The Company also has customer service, which serves both as information centre and channel for filing complaints.

Project-related grievance will be collected during the pre-construction phase, during the implementation of construction works, during the operation phase of roads reconstruction works and throughout ash disposal activities.

The mechanism will allow that complaints are raised anonymously. 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 Log Register will have all necessary elements to disaggregate the grievance by gender 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, if the grievance is not raised anonymously,
- description of grievance,
- date of receipt / acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures) and how were they communicated to the grievance holder,
- 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.

All information on the grievance holder will be treated with confidentiality.

The reception of grievance should be formally acknowledged 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 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 minimise unnecessary/unwarranted actions. If

they agree with the approach required actions will be implemented to deal with the issue. Completion of actions is recorded in the Grievance Log Register. The response is signed off by the appropriate manager. This includes either signing off the Grievance Log Register or confirming in official correspondence (which will then be filed with the grievance to indicate agreement and referenced in the register).

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 followed up 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. The grievance resolving process is presented in the Figure 4 below.

At all times, complainants are also able to seek legal remedies in accordance with local laws and regulations.

The implementation of the SEP is the overall responsibility of PIU that will be obliged to coordinate and delegate the activities between PIU, Ministry of Environmental Protection, Energetika and the City of Kragujevac.

Contact information of PIU and City of Kragujevac focal person(s) will be published prior to the commencement of land acquisition process (if it turns to be necessary for roads reconstruction).

Grievances in relation to roads reconstruction 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 as PIU. The Contractor(s) assigned for the roads reconstruction works will have Community Liaison Officer (CLO) appointed as a focal point, to liaise with local communities and collect their grievances related to construction activities and grievance management. Grievance management will be incorporated in monthly reports to the Supervising Engineer (if appointed), and further to the City of Kragujevac and the PIU. Residents of the affected communities will be informed about the CLO contact information before construction begins, through announcements in the premises of the local community offices and the media, where appropriate.

For works related to ash stockpile disposal within the Zastava complex and off-site ash disposal areas, contact information of PIU and Energetika focal person(s) will be published on Energetika website prior to beginning of the ash removal activities from the Zastava premises and during the ongoing activities related to the off-site ash deposit sites.

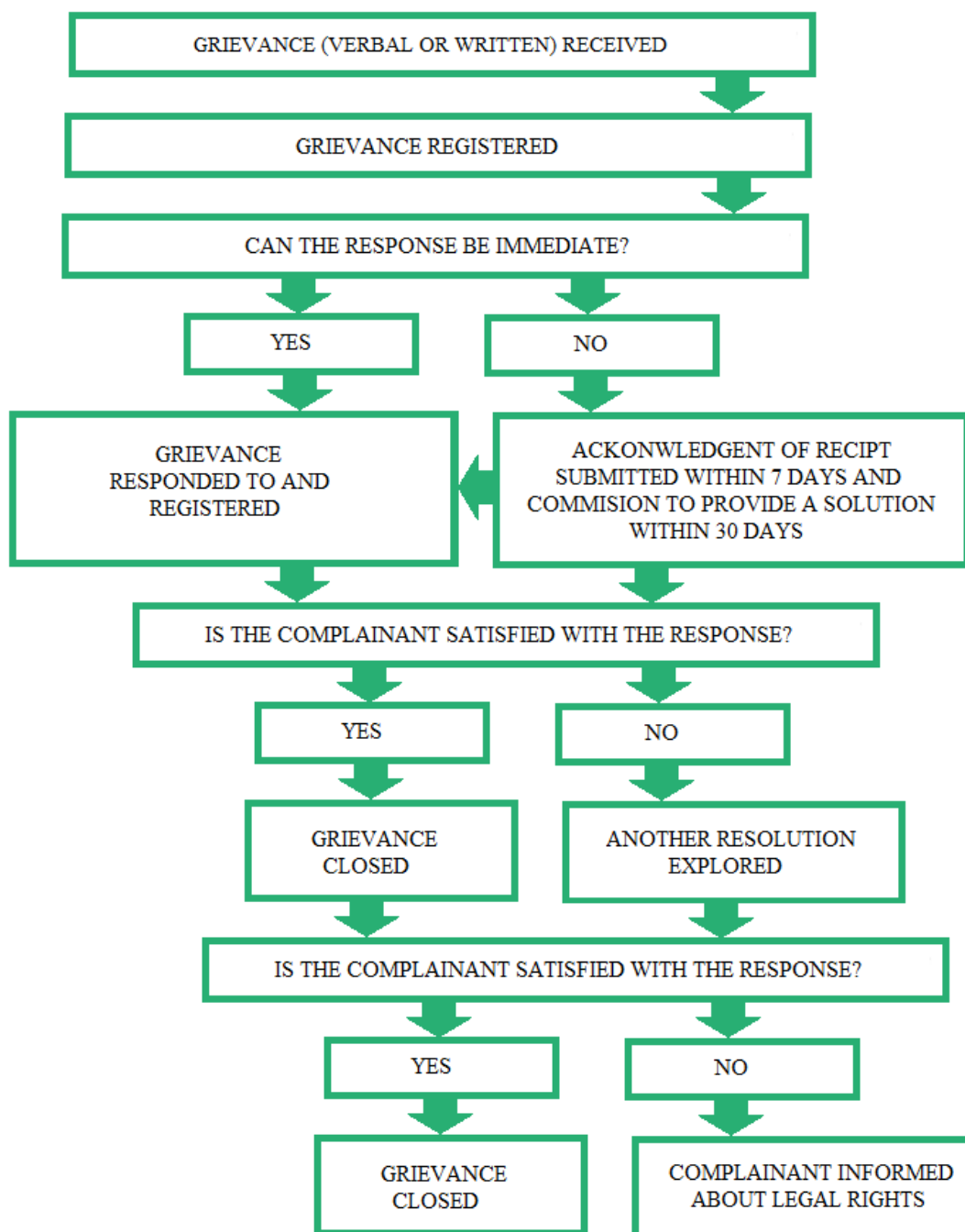


Figure 1 Grievance Resolving Process



## 8 Implementation of Stakeholder Engagement Activities

---

### 8.1 Roles and Responsibilities

The implementation of the Stakeholder Engagement Plan is the overall responsibility of the PIU which will coordinate and delegate stakeholder engagement activities among PIU, Ministry of Environmental Protection, Energetika and City of Kragujevac representatives. Certain activities, as was described in Chapter 6, are expected to be implemented by the Contractor(s) through Contractor's Community Liaison Officer (CLO) responsible for disbursement of information to the community, grievance collection and management related to construction activities.

### 8.2 Recordkeeping

All stakeholder activities have to be properly recorded.

- Public announcements – date of announcement, content, outlets (newspapers, radio or TV stations, websites, etc.)
- Public meetings – invitations (how and when were the meetings announced), content, list of attendees, comments or remarks noted, photographs
- Individual meetings - invitations (how and when was the meeting arranged), content, list of attendees, comments or remarks noted, photographs
- Surveys – filled in survey forms
- Official correspondence with authorities
- Grievance Log Register – to include date the grievance was received, name of grievant (or anonymous), content of the grievance, location, assigned responsibility, measures taken to resolve the grievance, date of resolution (time taken to resolve the grievance), communication with the grievant.

### 8.3 Monitoring and Evaluation

The outcomes of stakeholder engagement will be monitored through the following Key Performance Indicators (KPI):

- SEP is up to date and Project information is available for the public to comment.
- Actions listed in the Stakeholder Engagement and Information Disclosure Programme of the SEP are implemented as scheduled.
- Grievances are logged and tracked through to resolution within a timeframe of 30 working days from confirmation of receipt (noted in updated Grievance Log Register).
- 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 are made available as part of annual external reporting on the E&S performance of the Project which shall be made publicly available

## Appendix A

### **Public Grievance Form**

# A1 Public Grievance Form

<b>Reference No:</b>	
<b>Full Name (not obligatory)</b>	
<b>Contact Information</b> (Please note this information is not obligatory. Your grievance will be treated equally, however, no direct response can be provided.) Please mark how you wish to be contacted (mail, telephone, e-mail).	<input type="checkbox"/> <b>By Post: Please provide mailing address:</b> _____ _____ _____
	<input type="checkbox"/> <b>By Telephone:</b> _____
	<input type="checkbox"/> <b>By E-mail</b> _____
<b>Description of Incident or Grievance:</b>	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
<b>Date of Incident/Grievance</b>	
	<input type="checkbox"/> <b>One-time incident/grievance (date _____)</b> <input type="checkbox"/> <b>Happened more than once (how many times? _____)</b> <input type="checkbox"/> <b>On-going (currently experiencing problem)</b>
<b>What would you like to see happen to resolve the problem?</b>	
Signature: _____ Date: _____	

Please return this form to:

CONTACT INFO	Energetika d.o.o. Kragujevac	The City of Kragujevac	Ministry of Environmental Protection	Future Contractor
<i>Full Name of the authorized person for handling requests for free access to information of public importance</i>	<b>Jevtic Ivana</b>	<b>Jelena Timotijević</b>	<b>Aleksandra Tosic</b>	<i>Contact details of the contractor(s) will be added once the contractor(s) have been identified</i>
Address	Ulica Prvoslava Rakovica 4a, Kragujevac	<i>Nikole Pašića 6/2</i>	Omladinskih brigada 1	<i>TO BE CONFIRMED</i>
Telephone:	0800 034-033 (free of charge) +381 34 336-238  +381 62 8491256	+381602340356	+381 11 312 00 51	<i>TO BE CONFIRMED</i>
E-mail address:	<u>office@energetika-kragujevac.com</u>  <u>ijevtic@energetika-kragujevac.com</u>	<u>jtimitijevic@kg.org.rs</u>  <u>investicije@kg.org.rs</u>  <u>kabinet@kg.org.rs</u>	<u>Kragujevac.toplana@eko.gov.rs</u>	<i>TO BE CONFIRMED</i>
Web	<u>http://energetika-kragujevac.com/</u> <u>http://www.energetika-kragujevac.com/contact.php</u>	<u>https://www.kragujevac.rs/</u>	<u>https://www.ekologija.gov.rs/</u>	<i>TO BE CONFIRMED</i>