

Koridori Srbije
Corridor X Highway Project
Stakeholder Engagement Plan

Issue | 1 June 2018



PREPARED BY
ARUP

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Acronyms

Abbreviation	Full Name
CFD	Central Feedback Desk
CLO	Chief Liaison Officer
EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
KS	Koridori Srbije
PAP	Project Affected Persons
PERS	Public Enterprise Roads of Serbia
PR	Performance requirements
RAP	Resettlement Action Plan

1 Introduction and Project Description

1.1 Background to Stakeholder Engagement

This document is a Stakeholder Engagement Plan (SEP) prepared to identify and analyse relevant stakeholders, define communication channels and plans regarding the preparation of the Design, Construction and Operation of the Restructured Corridor X Highway Project.

While designing the appropriate engagement plan, all characteristics of each and every stakeholder group or individual should be evaluated and considered in order to make sure the designed actions are in general inclusive enough and specially inclusive of gender and vulnerable groups. An assessment was made on whether it is likely that some groups or individuals might be excluded from or unable to participate if mainstream consultation process. The SEP has taken into account the need for specific measures and/or assistance by virtue of any of characteristics of such specific groups.

Figure 1 EBRD Perspective on Stakeholder engagement

“The EBRD is committed to the principles of transparency, accountability and stakeholder Engagement. The Bank requires clients to engage with relevant stakeholders, in proportion to the potential impacts associated with the project and level of concern. The engagement will allow improving the quality of the project.”¹

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 take into account the needs of particularly vulnerable groups.

The SEP provides an overview of the national framework, the requirements of the European Bank for Reconstruction and Development (EBRD), international best practice, lessons learned and capacity built related to information disclosure and outline of the general approach to past stakeholder engagement and public consultation in course of implementation of the Sub-Projects identified through the restructuring of the Corridor X Highway Project Loan Agreement financed by EBRD.

Specific objectives of the SEP are further detailed in the following chapters.

1.2 Project Description and Objectives

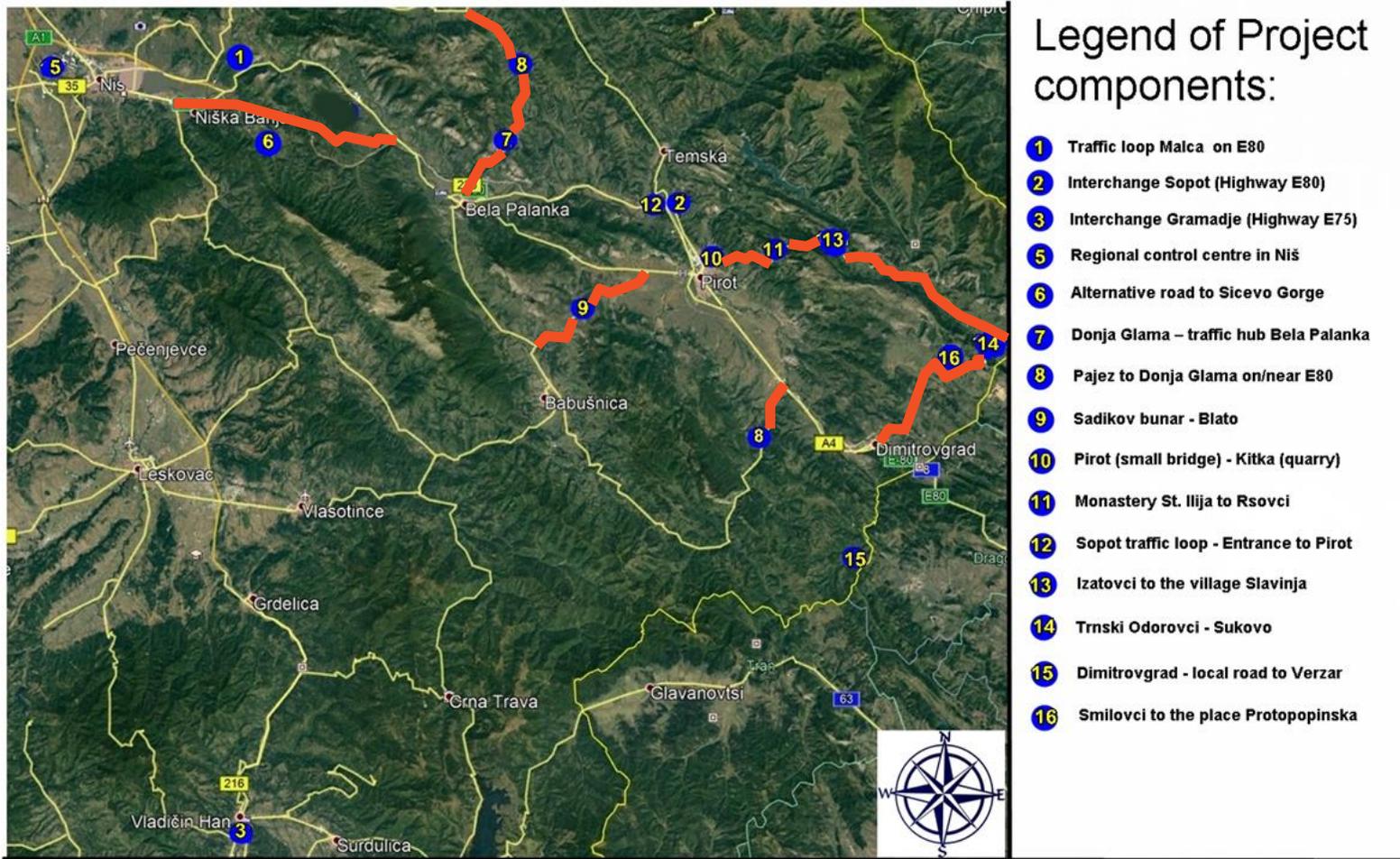
The Project consists of several different components implemented as a result of a restructuring of the Corridor X Highway Project, financed through a Loan Agreement signed between the Republic of Serbia and The European Bank for Reconstruction and Development. The table below shows individual components to which this SEP is applicable and envisages both construction and rehabilitation works.

¹ EBRD (2014) PR 10: Information and Disclosure and Stakeholder Engagement read in conjunction with PR 1: Assessment and Management of Environmental and Social Impacts and Issues. Environmental and Social Policy, accessible at www.ebrd.com.

Table 1 List of Sub-Projects to be implemented

CONSTRUCTION WORKS (HIGHWAY E80)	
1	Traffic loop Malča on E80 - divided into: LOT 1 – Construction of the section: From Traffic loop "Malča" to Interchange "Prosek" (L=2km) LOT 2– Rehabilitation of the section: Connection of traffic loop "Malča" and Highway A-4 (L=4km)
2	Construction of Interchange Sopot (Highway E80)
CONSTRUCTION WORKS (HIGHWAY E75)	
3	Construction of Interchange Gramadje (Highway E75)
4	Completion of Batajnica Interchange (Highway E75)
5	Design and construction of Regional control centre in Niš
REHABILITATION WORKS (HIGHWAY E80)	
6	Rehabilitation of the alternative road to Sićevo Gorge on E80 (L=15.75km)
7	Rehabilitation and conformation of the bridge category with the state road of IIA class and rehabilitation of section: Donja Glama – traffic hub Bela Palanka on E80 (L=5.14km)
8	Rehabilitation of section from junction Pajez to Donja Glama on/near E80 (L=6km)
9	Rehabilitation of section Sadikov bunar - Blato (L=3.1km)
10	Rehabilitation of section: Pirot (small bridge) - Kitka (quarry) (L=6.1km)
11	Rehabilitation of section from Monastery St. Ilija to Rsovci (L=2.0km)
12	Rehabilitation of section: Sopot traffic loop - Entrance to Pirot (Industrial zone) (L=6km)
13	Rehabilitation of the section from the village Izatovci to the village Slavinja (L=6km)
14	Rehabilitation of section: Hub Trnski Odorovci (22303) - Hub Sukovo (L=8.1+6.1km)
15	Rehabilitation of section Junction Dimitrovgrad - Intersection with the local road to VerzaL=7.825km)
16	Rehabilitation of the section from the village of Smilovci to the place Protopopinska vodenic (L=4km)
REHABILITATION WORKS ON BELGRADE BYPASS	
17	Rehabilitation of section: Interchange "Belgrade" (Dobanovci) - Bridge no.8 "Sava" (Ostruznica) (Highway E75) (L=10.2km)
REHABILITATION WORKS ON HORGOSŃ –NOVI SAD HIGHWAY	
18	Rehabilitation of the Section (Highway E75): State Border of Hungary - Novi Sad (L=40km)

The figures below depict the Sub-Projects areas.

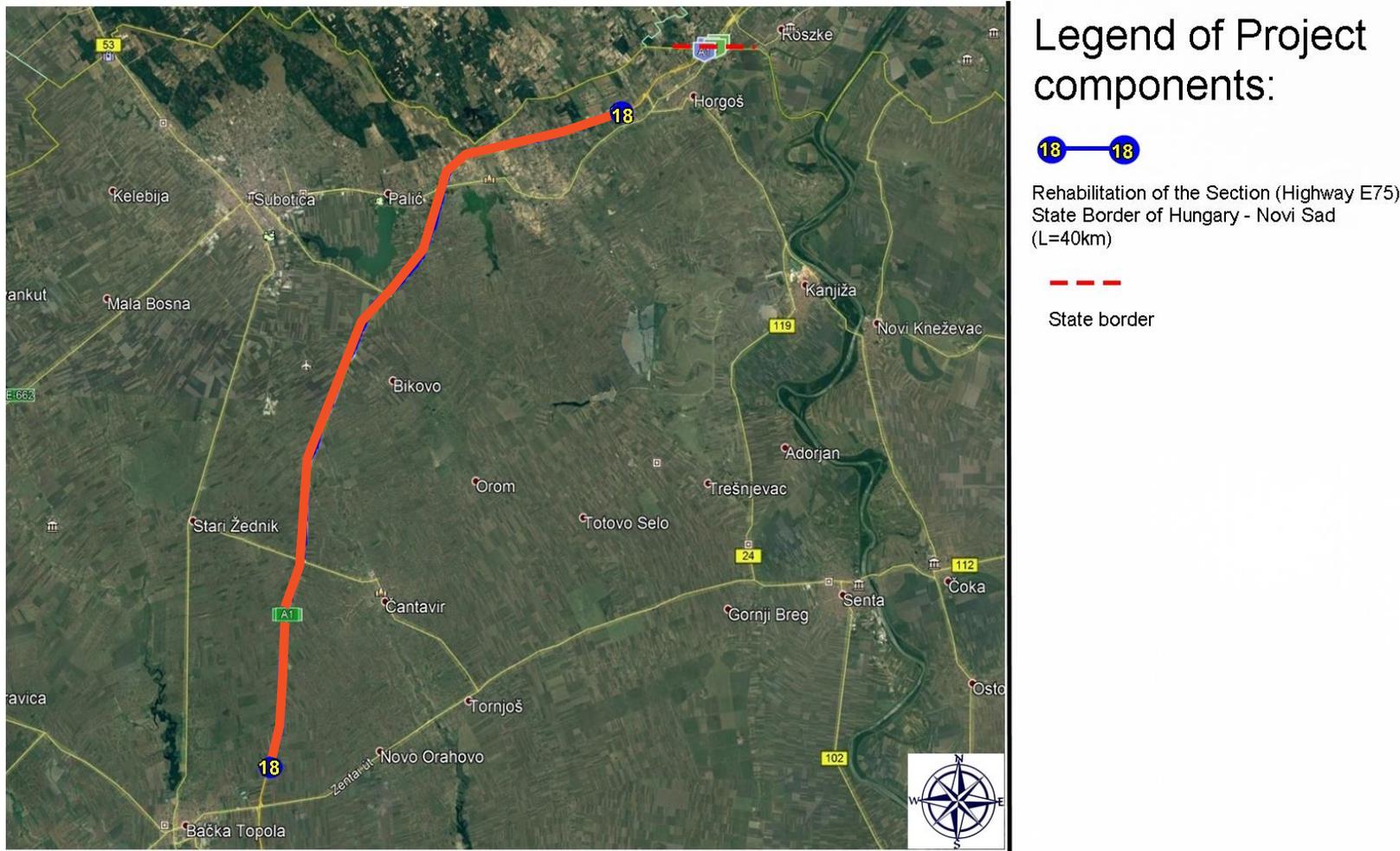


Map of the Southbound Project area

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Map provided by Google Earth

Figure 2 - Project area Southbound

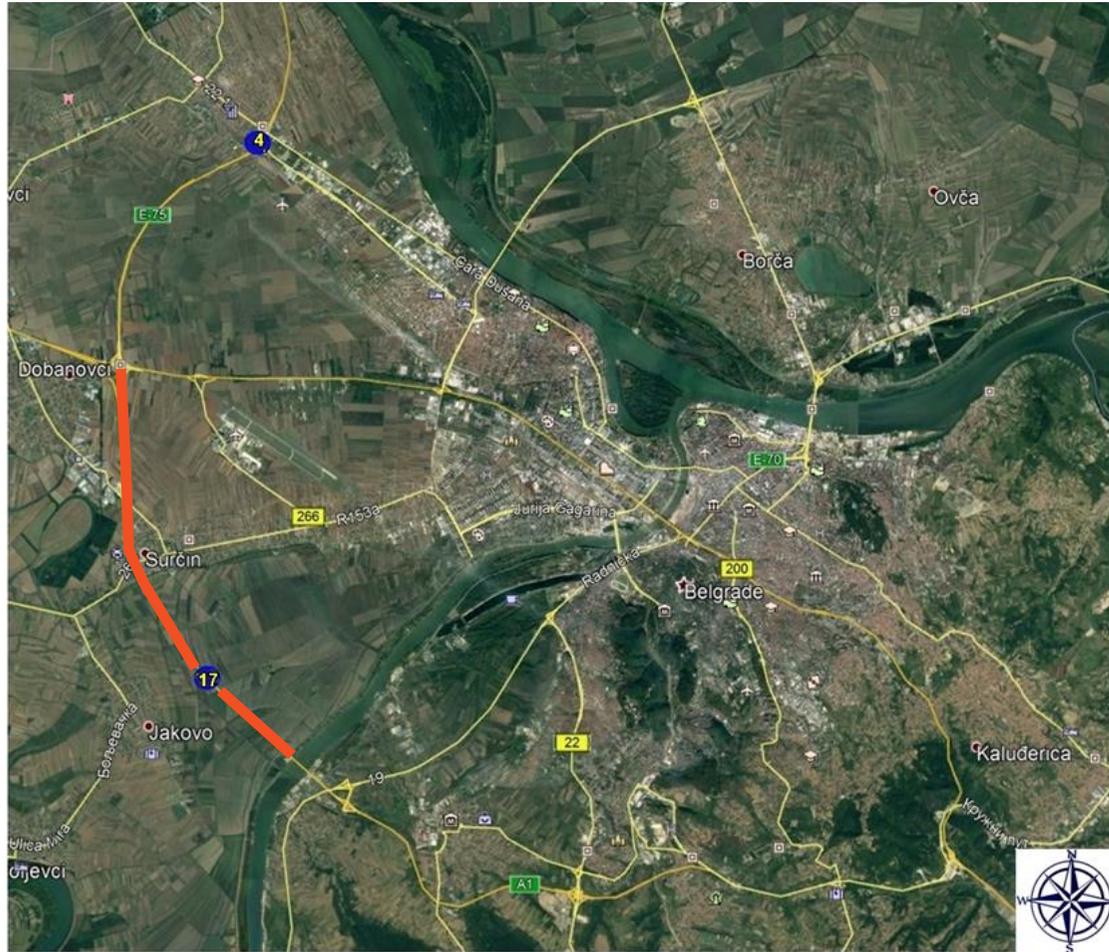


Map of the Northbound Project area

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Map provided by Google Earth

Figure 3 - Project area Northbound



Legend of Project components:

- 4 - Completion of construction at Batajnica Interchange (Highway E75)
- 17 - Rehabilitation of section: Interchange "Belgrade" (Dobanovci) - Bridge no.8 "Sava" (Ostruznica) (Highway E75) (L=10.2km)

Map of the Central Project area

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Map provided by Google Earth

Figure 4 - Project area Central

1.3 Institutional Arrangement and Implementation Team

Responsibility for Implementation of the Project, and this SEP, as defined in chapter 1.2, lies with the Project Promoter, namely Koridori Srbije (hereinafter: KS). KS will closely liaison with other relevant institutions, governmental bodies, local governments, and affected communities and individual as well as with other stakeholders to engage with them and ensure full disclosure of information and documents as defined by this SEP.

The day-to-day implementation of the SEP will be the responsibility of the Land acquisition and resettlement department of KS, within their legal department, collectively referred in this SEP as the Central Engagement Team (CET). The department employs 15 experts experienced in stakeholder engagement – planning, implementation and monitoring, as well as in land acquisition and resettlement processes, and dispute avoidance. Individual responsibilities within the department itself will be assigned separately and included in future information packages. Within the department one person shall be appointed as an outreach specialist to oversee the stakeholder engagement and grievance management, coordinate activities as per the schedule and list of activities.

Stakeholder engagement and grievances management related to construction activities will be managed by the Contractors Grievance officer and overseen by the Supervision Consultant to be appointed to act as the Engineer in accordance with the Contract for Construction works. The Contractors responsibilities shall be clearly delineated and specified in the respective works contracts. Salient features of the SEP shall be incorporated in the Tender documents and their application shall be mandatory. Prior to construction, the public and local community will be informed, through the Koridori Srbije and respective Municipality's Administration website, about the Contractor's contact information and Grievance officer.

2 Objectives of the SEP

The main objectives of stakeholder engagements are to:

- Insure 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 taken into account 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 a 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 the Project cycle i.e. for, pre-construction including land acquisition, construction/rehabilitation activities and operation.

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

Table 2 Project Phases

Phase	Status (Planned / Completed)
Phase 1: Pre-construction Phase including Land acquisition and involuntary resettlement	Planned
Phase 2: Construction/Rehabilitation Phase	Planned
Phase 3: Operation	Planned

3 Legal Framework and Requirements

3.1 The National Requirements for Public Consultation and Stakeholder Engagement

The Republic of Serbia legal framework does not have a single self-standing separate law or policy treating the subject of Stakeholder engagement. However, the idea of stakeholder engagement is becoming more of a requirement in compliance with European regulations and best practice. Public participation provisions through various existing laws and policies are outlined below:

- The Constitution of the Republic of Serbia (“Official Gazette of RS” No. 98/06). Passed in 2006 (), proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, the right to undisturbed use of property, and commitment to European principles and values. Two modalities of public participation are envisaged i.e. referendum and petitions.
- Law on Planning and Construction (Official Gazette of RS no, 72/2009, 81/2009. – error 64/2010- decision of the CC 24/2011, 121/2012, 42/2016 – decision of CC 50/2013- decision of CC, 98/2013, decision of CC 132/2014, 145/2014 and 65/2017). This law regulates the system of spatial development of Serbia and defines the scope of public review and participation throughout the process of development and adoption of planning documents, including Location Permits, Construction Permits, and Operating Permits. The category of Specific Area Spatial Plans, most commonly determines the land use and large infrastructure projects. There are required outlines of any such plan whereas one chapter is dedicated to the consideration of potential demographic and social impacts. Mandatory chapter 13 refers to access to documentation.
- Law on Expropriation (passed in 1995 and enacted on January 1, 1996, amended in March 2001, amended again on March 19, 2009, and 2013 by the Constitutional Court ruling) enables government institutions to acquire property for projects that are deemed to be of public interest, while protecting the interests of all persons with legal title, whose assets are to be expropriated. The procedure to be followed incorporates stakeholder engagement throughout the process commencing with the proclamation of the public interest until compensation payment.
- Convention for the Protection of Human Rights and Fundamental Freedoms as supplemented by Protocol No.1- This article lays down a general rule followed by two specific rules to protect the right to property. Deprivation is only permitted if it is: lawful; in the public interest; in accordance with the general principles of international law; reasonably proportionate ("fair balance" test) and logically accompanied by meaningful and timely stakeholder engagement.
- UN Economic Commission for Europe (UNECE) Aarhus Convention

The Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters, which the Republic of Serbia has ratified on May 12, 2009. („Official Gazette – International Contracts “, No. 38/09) came into force in 1998 and links

environmental rights and human rights and is based on the belief that it is a basic right of present and future generations to live in an environment adequate to health and wellbeing. The convention is focused on achieving this through the implementation of three pillars: rights of access to information, access to decision-making, and access to justice.

Convention states that public participation should be timely, effective, adequate and formal, and contain information, notification, dialogue, consideration and response.

3.2 EBRD Requirements

The Performance Requirement 10 (PR 10) developed by the EBRD promote the principle of strong stakeholder engagement as a focal point to achieve and build strong, constructive and responsible relationship essential for the successful management 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 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 cultural 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 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 sector 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 and stakeholder "fatigue" on one hand but on the other comply with the more stringent EBRD standards and requirements of stakeholder engagement.

3.4 Project Standards

The lessons learned during implementation of the Corridor X Highway Project have made it justifiable to bring the Stakeholder engagement to a higher level by raising the standards and refreshing the principles and commitments of the Project Promoters. Therefore, this Project shall adhere to the following standards:

- Transparency;
- Monitoring and evaluation of effectiveness of stakeholder engagement;
- Exchange of knowledge and lessons learned;
- Awareness of strategies and activities;
- Policies made simple;
- Empowered communication;
- Accountability;
- Social responsibility toward vulnerable and marginalized social groups.

4 Previous Stakeholder Engagement

During the pre-construction phase the main stakeholder engagement activities included high level engagement with EBRD, the Ministry of Construction, Transport and Infrastructure, the Ministry of Finance, PERS and the Local Administrations i.e., the City of Niš, City of Vladicin Han, City of Dimitrovgrad and the City of Pirot respectively.

Many of the Sub-projects were identified by the local communities as projects of significant importance to local communities which could largely contribute and support economic activities and sustainable development of those communities. During this phase public consultation meetings were held and written suggestion/petitions collected to finally identify the Scope of the Sub-Projects.

In March 2017 Meetings were held with the representatives of the city of Vranje, Vladicin Han and Leskovac where future infrastructure needs of the area were explored.

The purpose of these activities was to gauge the Projects viability and identify any key issues early in the Project. The main topic of discussion was around the processes to be implemented. The Main outcomes of this phase were to present at the national authority level the concept of the Sub- Projects and how they can achieve the Corridor X Highway objectives and enhance the already achieved or expected positive effects.

On April 12, and 13, 2018 Stakeholder engagement meetings were held in the Niš, village of Malča with 40 stakeholders present. The aim of this meeting was to inform the local communities of the planned construction of the Malča Interchange and discuss the possible impacts associated with this Sub-project. Socio economic survey of the participants was also organised at this time.

The table below indicates the details of previous stakeholder engagement and consultations.

Table 3 - Previous Consultations

Date and place	Number of attendees	Stakeholder Group	Key points raised
March 2017 Vladicin Han	25	High level local Government representatives of Leskovac, Vladicin Han and Vranje	Concerned about alternative roads. Request in design changes and request of construction of Interchange Malča and Granade
10 April 2018 Municipality Pantelej Niš	10	High level local Government representatives of Niš	Request for Construction of Malča Interchange Concern on the extent of administrative support to information disclosure and other stakeholder engagement activities. Land acquisition and timing of compensation payment.
12 April 2018 Malča Settlement	40	Road users/ Population affected by land acquisition Design and access restriction along the Project route and access roads. Population, who may benefit from the better traffic access.	Land acquisition and timing of compensation payment. Price of land. Overall entitlements. Timing of land acquisition and conflict with cultivation activities from May through September 2018. Necessity to acquire unviable land
13 April 2018 Malča Settlement	30	Population affected by land acquisition Entrepreneurs	Major concern whether the highway will intersect current road to Nis. Land acquisition and timing of compensation payment. Price of land. Overall entitlements. Timing of land acquisition and conflict with cultivation activities from May through September 2018.

Date and place	Number of attendees	Stakeholder Group	Key points raised
10 April – 24 May 2018 From Belgrade – contact with PAPs from Malča Settlement established over the phone	25	Persons affected by land acquisition	Land acquisition and timing of compensation payment. Price of land. Overall entitlements. Timing of land acquisition and conflict with cultivation activities from May through September 2018.
9 May 2018 Malča Settlement	5	Persons affected by land acquisition	Timing of land acquisition and conflict with cultivation activities from May through September 2018
10 April – 24 May 2018 Malča Settlement (direct visits to households with elderly members unable to attend mainstream events)	10	Persons affected by land acquisition	Major concern whether the highway will intersect current road to Nis. Land acquisition and timing of compensation payment. Price of land. Overall entitlements. Timing of land acquisition and conflict with cultivation activities from May through September 2018. Compensation entitlements to non-registered title holders

5 Stakeholder Identification and Analysis

For the purposes of this plan and according to EBRD Performance Requirements (PR 10, point 8) stakeholders are individuals or groups that are 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”).

Additionally, the Project’s Resettlement Policy Framework (RPF) was supplemented by additional guidelines, and sets principles on how to identify stakeholders directly affected by land acquisition as well as principles and activities for engaging with people affected by the Project.

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 change in course of the process of implementation. It shall therefore be regularly reviewed and updated throughout project cycle. The risk associated to each stakeholder group can also be subject to changes and shall be reassessed from time to time. The best way to do so is at project phases commencement set as milestones. The aim is to assess whether the risk associated to a specific stakeholder group has changed its balance. Prior to this assessment circumstances shall be identified that have led to such change in order to apply adaptive commensurate measures.

Not all impacts target all stakeholders equally, as some can be either influenced by subjective internal or objective external factors. Whatever the factor may be they have all been cross-referenced through the stakeholder risk mapping exercise resulting in identification of groups based on their relation to the project. 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 (Table 4),
- Regional and Local Government Stakeholders – high interest, high local influence, high local power and locally important decision making group (Table 5),
- Affected Population, Enterprises and Public Service Facilities – high interest, low to medium influence, low power, low to medium influence over the decision making process (Table 6),
- External Stakeholders affected by construction – medium to high interest, medium influence, but are influenced by internal subjective factors (Table 7),
- Other Interested Parties – various interest and influence levels (Table 8),
- Vulnerable groups – high interest and higher risk of poverty, low interest, low power (Table 9).

Table 4 National Government Stakeholders

Stakeholder Group(s)
The Government
The Ministry of Construction, Transport and Infrastructure
Ministry of Finance
Tax Administration office with its local branches
Institute for protection of Cultural Heritage
Institute for nature conservation

Table 5 Regional and Local Government Stakeholders

Stakeholder Group(s)	
City of Niš	City of Belgrade
City of Novi Sad	City of Subotica
City Municipality of Pantelej	City Municipality of Zemun
Local municipal offices in settlement Malča	Local municipal offices in the urban settlement of Batajnica
Municipality of Vladicin Han	Local Municipal offices in village Jelašnica
Local municipal offices in settlement Gramade	Local Municipal offices in village Prosek
City of Pirot	Local Municipal offices in village Ravni Do
Local municipal offices in village Sopot	Local Municipal offices in village Tamjanica
Local Municipal offices in village Veta	Local Municipal offices in village Prosek
Local Municipal offices in village Glogovac	Local Municipal offices in village Toponica
Local Municipal offices in village Crvena Reka	Local Municipal offices in village Donja Glama
Local Municipal offices in village Bukurovac	Local Municipal offices in village Blato
Local Municipal offices in village Berilovac	Local Municipal offices in villages Prčevac
Local Municipal offices in village Rsovci	Local Municipal offices in settlement Radin Do (Pirot)
Local Municipal offices in village Slavinje	Local Municipal offices in village Izatovci
Local Municipal offices in village Visočka Ržana	Local Municipal offices in village Trnski Odorovci
Local Municipal offices in village Sukovo	Local Municipal offices in village Gornja Držina
Municipality of Dimitrovgrad	Municipality of Bela Palanka
Institute for Cultural Heritage Preservation Department in Niš	Institute for Nature Conservation Department in Niš

Table 6 Affected Population, Enterprises and Public Service Facilities

Stakeholder Group(s)
Economically displaced persons
Formal and informal owners of land required for the Project within the following cadastral Municipalities in the City of Niš: Pantelej and Malča
Formal and informal owners of land required for the Project within the following cadastral Municipalities in Vladačin Han: Gramađe
Formal and informal owners of land required for the Project within the following cadastral Municipalities in Belgrade: Batajnica
Other groups potentially influenced by or interested in the project
Farmers
Education facilities (school and pre-school)
Business within the Municipality:
Health care facilities
Public social welfare institutions
Local utility companies (water, electricity, telecommunication)
PERS – Road maintenance

Table 7 External Stakeholders Affected by Construction

External stakeholders affected by construction
Road users on Horgoš- Novi Sad
Road users of Belgrade Bypass
Road users of E 75 at Petlja Gramađe
Road users of E80
Administration of Monastery St. Ilija in Rsovcı
Administration /Management of the Industrial Zone in Pirot
Administration /Management of all individual entities operating within the Industrial Zone
Administration of Monastery Poganovo

Table 8 Other Interested Parties

Stakeholder Group(s)
NGOs
Local Media, RTV Caribrod, Radio and TV Tanuki (Pirot), Radio
Prospective Contractor
Prospective Supervision consultant for Supervision of construction works
Any future ESMP Supervising consultant
EBRD

Table 9 Vulnerable groups and individuals

Stakeholder Group(s)
Women
Elderly /Pensioners
People living with a disability
Minority communities
Single headed households living in rural areas of affected settlements
Persons receiving income support
Illiterate men and women
Persons /groups non or incompletely integrated into the community

6 Stakeholder Engagement and Information Disclosure Program

The Stakeholder Engagement and Information Disclosure Programme includes a clear plan of actions with deadlines and responsibilities in order to ensure the maximum engagement level for all relevant stakeholders.

An initial Stakeholder Engagement Programme is presented in this chapter to cover the phases of the Project cycle. The Project cycle comprises the following:

- Pre-construction Phase comprising of:
 - Consultation on the draft SEP,
 - Consultation on the draft RAPs,
 - Land acquisition and resettlement information disclosure and dissemination,
 - Disclosure of final documents (SEP, RAPs etc.),
 - Disclosure and dissemination of information on Grievance Mechanism.
- Construction/Rehabilitation Phase which includes:
 - Implementation of SEP and Grievance Mechanism,
 - Regular reporting to EBRD on the status of stakeholder engagement and grievance redress,
 - Evaluation of implemented measures and review of approach if necessary.
- Operation Phase.

6.1 Available Communication Tools

As part of the stakeholder engagement Koridori Srbije intend to disclose the following documentation and information regarding the Project:

- This Stakeholder Engagement Plan (SEP);
- Project description and updates regarding the implementation progress of the Project;
- Information on community health and safety risks and impacts (including any expected road access restrictions and construction works) and proposed mitigation measures;
- Resettlement Action Plans (RAPs),
- Summary of conclusions from the consultative meetings and public discussions held;
- The Grievance Redress Mechanism, its objectives, and the information request form (information will be made easily accessible and understandable by distributing an information leaflet across the affected communities)

The Project Implementing Entity uses the following channels for regular and direct communication with stakeholders:

- Official website of Koridori Srbije (www.koridorisrbije.rs)

- Official website of the Municipality of Pirot(www.pirot.rs)
- Official website of the City of Niš (www.ni.rs)
- Official website of the City of Novi Sad (www.novisad.rs)
- Official website of the City of Subotica (www.subotica.rs)
- Official website of the City Municipality of Zemun (<http://zemun.rs/>)
- Official website of PE Roads of Serbia (www.putevi-srbije.rs)
- Telephone, mail, fax or e-mail inquiries to Koridori Srbije
- Public announcements communicated to the media (local radio and television stations, daily newspapers),
- Frequent/regular visits to the affected communities, and
- Visits and individual consultation with vulnerable persons/groups.

The information packages will be available in Serbian (as well as in English for prior review of EBRD) immediately upon the commencement of the Project on the websites of the involved Municipalities, and Koridori Srbije, as well as in printed copies at the following addresses:

- Koridori Srbije d.o.o., Kralja Petra 21, 11000 Beograd
- Mesna Zajednica Malča, Malča bb
- Gradska opština Pantelej, Gutenbergiva 4a, 18103 Niš,
- City of Pirot, Srpskih vladara 82, 18300 Pirot
- Municipality of Dimitrovgrad, Balkanska 2, 18320 Dimitrovgrad,
- City Municipality of Zemun, Magistratski trg 1, 11080 Zemun.
- City of Novi Sad, Trg slobode 1, 21000 Novi Sad
- City of Subotica, Trg Slobode 1, 24000 Subotica

These documents and information will remain in the public domain for the entire duration of the Project.

7 Stakeholder Engagement Plan

7.1 Pre-Construction Phase Including Land Acquisition and Involuntary Resettlement

During pre-construction period the information package shall be updated as needed and disclosed. It is important to notify local stakeholders, in a meaningful and timely manner, of any activities that might impact them.

Table 10 Engagement in Pre-Construction Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
Pre-Construction Phase – General						
1.	Notify stakeholders of the implementation Program for all identified Sub-Sections	All	30 days after formal approval of restructuring of the Corridor X Highway Project. One -off	Koridori Srbije	<u>For notifications:</u> Announcement on website of Koridori Srbije, at premises and main public places of the affected municipalities. Mass media (local newspapers, TV channels, radio, social media). Information will be mainly available in Serbian and English languages on official websites.	Enquiries and comments via Koridori Srbije website. Response via official correspondence, e-mail.
2.	Notify stakeholders of the progress in design activities and present salient features of design, alignment and route alternatives if any.	Directly impacted	At least once during design phase	Koridori Srbije assisted by the Designer	<u>For notifications:</u> Announcement on the website of Koridori Srbije, at premises and main public places of the affected municipalities and local Municipal offices (Mesne zajednice).	Enquiries and comments via Koridori Srbije website. Response via official correspondence, e-mail

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
					<p>Mass media (local newspapers, TV channels, radio, social media). Information will be mainly available in Serbian and English languages on official websites.</p> <p><u>For presentations:</u> Public meetings.</p>	Directly during meetings
3.	<p>Notify stakeholders on the commencement of the Building permitting process and provide opportunities for comments.</p> <p>Disclose the decision and relevant documentation on the Building permit and provide opportunities for comments</p>	General public, Concerned authorities and organizations	Immediately after commencement of permitting processes for each Sub-Project	Koridori Srbije	<p>Public notice and official correspondence by concerned authorities and organizations.</p> <p>Noticeboards and website of the building authority and the affected municipality</p> <p>Koridori Srbije to disclose the Building Permits on their website</p>	Enquiries and comments via the Koridori Srbije designated channels of communication. Response via official correspondence, email
4.	Particular effort with regards to notifications and disclosure as described in bullets 1 through 3	Vulnerable groups/persons	As defined in bullets 1 through 3	Koridori Srbije	<p>In addition to communication tools described in bullets 1 through 3 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</p>	In addition to channels made available under bullets 1 through 3, 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

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
					of documents, using non- technical language will 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	information to settle in and collect comments and concerns.
Pre-Construction Phase – Land Acquisition and Resettlement						
5.	Preparation and disclosure of site specific RAPs	All formal and informal owners of land and assets attached to the land impacted by construction activities	To be prepared in parallel with the design To be publicly disclosed at least 30 days prior to the start of the expropriation process	Koridori Srbije	Public notice and official correspondence by concerned authorities and organizations. Noticeboards and website of the affected local municipalities	Enquiries and comments via the Koridori Srbije designated channels of communication. Response via official correspondence, email and on site representative of Koridori Srbije
6.	Implement stakeholder engagement and information disclosure activities for Project-Affected Persons	Project Affected Persons affected directly by land acquisition and resettlement within the corridor of Impact. Special effort to engage women or women as household members	Prior to preparation of RAP	Koridori Srbije	Notices and updates on the website of Koridori Srbije Direct individual invitation sent to PAPs address. Public notice and official correspondence by concerned authorities and organizations. Noticeboards and website of relevant authorities and municipality premises in the affected settlements. Hard copies available at Koridori Srbije headquarter in Belgrade, Kralja	Enquiries, statements, objections, comments directly at meetings, and/ or via the Koridori Srbije e-mail designated in the invitation as focal contact for information, and/or via direct communication with municipalities, who will then forward the comments to Koridori Srbije through official channels.

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
		Relevant authorities from affected Municipalities			Petra 21 and in each of the affected Municipalities	
7.	Engage with stakeholders during preparation of site specific RAPs and implementation of individual measures as prescribed in the RAP	All	TBD	Koridori Srbije	Social Survey of all affected households with individual visits to each affected household Disclosure of draft RAP Dissemination of Cut-Off date via public announcements	Written or oral invitation of each affected households Open questions for comments available in the Social Survey; comments incorporated on the RAP where appropriate
8.	Grievance Mechanism	All	Immediately	Koridori Srbije	Public notice boards and official correspondence by authorities and organizations. Noticeboards and website of the affected local municipalities Distribution of Grievance Guidance Brochures (Appendix B) to home addresses.	Enquiries and comments via the Koridori Srbije designated channels of communication. Response via official correspondence, email and on site representatives of Koridori Srbije
9.	Particular effort with regards to activities from 1 through 8	Vulnerable groups/ individuals	As assigned to under each respective bullet	Koridori Srbije with assistance of external specialist as needed (sign language specialist, gender specialist etc.	In addition to communication tools described in bullets 1 through 8 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	In addition to opportunities listed in bullets 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

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
					of documents, using non- technical language will 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 will be present for hearing impaired persons	and collect comments and concerns.

7.2 Construction

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

Table 11 - Engagement during Construction phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
10.	Disseminate information about anticipated construction activities to affected stakeholders.	Affected communities, Project affected persons (e.g. land owners, vulnerable groups etc.), Public.	At least starting from 30 days prior to construction.	Koridori Srbije, Contractor	Koridori Srbije website, official correspondence, mass media, local noticeboards and premises of municipalities. Chief Liaison Officer (CLO) of Contractor	Grievance mechanism Contractors grievance / liaison officer (CLO)

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
11.	Keep stakeholders informed on any project or construction-related activities that might affect them (e.g. notify stakeholders of 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, Koridori Srbije	Disclosure of Monthly work plan Koridori Srbije website, official correspondence, mass media, local noticeboards and premises of municipalities Chief Liaison officer of Contractor	Grievance mechanism Contractors grievance liaison officer Via Contractors designated e-mail and phone Via information boxes to be installed at construction site As envisaged by national law
12.	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 signature of 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
13.	Disclose information on project Environmental and Social construction performance.	PAPs, General Public	Semi-annually	Contractor	Contractors website	
14.	Particular efforts with regards to activities from 1 through 13	Vulnerable groups/ individuals	As assigned to under each respective bullet	Koridori Srbije with assistance of external specialist as needed (sign language	In addition to communication tools described in bullets 1 through 13 vulnerable groups will receive	In addition to opportunities listed in bullets 1 through 13 In addition to opportunities listed in bullets

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
				specialist, gender specialist etc.	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. Illiterate or partially literate persons will have documents read out loud in presence of a entrusted third person and sign language knowledgeable person if needed will be present for hearing impaired persons	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.

7.3 Operation

Table 12 - Engagement during Operations Phase

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
15.	Disseminate information about transition of responsibilities and liabilities from Contractor to Road Management authority	Affected communities, Project affected persons, General public.	At least starting from two months prior to taking over of works	Contractor and Koridori Srbije and Road Management authority	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employer's website. Chief Liaison officer of Contractor	Contractors grievance / liaison officer Koridori Srbije website
16.	Keep stakeholders informed on any operation -related activities that might affect them (e.g. notify stakeholders of road closures and diversions) traffic jams and similar	Road users, relevant local /regional/ national authorities, General public	From commencement of operation phase and on going	Road management authority	Mass media. On Road signs Road management authority website	As envisaged by national law
17.	Update stakeholder information	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	Contractor	Contractor's website, official correspondence, mass media, local noticeboards and premises of municipalities. Employers website	As envisaged by national law

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment
18.	Communicate emergency preparedness and response plans on a regular basis	General Public	As per national requirements	Road Management Authority	Mass media Road managements authority website	As envisaged by national law
19.	Road safety and dissemination of unsafe location on roads especially black spots	Road users, General public, Relevant authorities	In appropriate intervals	Road management authority	Mass media Road managements authority website	Via Road management authority website
20.	Disseminate information on road conditions (four seasons)	Road users, General public	In appropriate intervals	Road management authority	Mass media Road managements authority website	Grievance mechanism .Via CLO Via designated e-mail and phone
21.	Organizing traffic count and monitoring on other values on public road	General public, Road users	As per national law requirements	As per national requirement	Mass media Road managements authority website	Via designated e-mail and phone
22.	Disseminate information about tolling stations and tolling cost	General Public, Road users	As per national requirements	Road management authority	Mass media Road managements authority website	Via designated e-mail and phone

8 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 (and applicable for all sub-projects). Given the type of potential project impacts, the Project will have a central redress mechanism i.e. the Central Feedback Desk (CFD) with Koridori as the main implementing entity for the CFD. The CFD shall serve as both Project level information centre and grievance mechanism, available to those affected by implementation of all Project sub-components throughout the Project Cycle. Appendix B provides an outline of a sample of the Grievance Guidance Note (GGN). The Note will be available in Serbian and other appropriate languages if such a need should occur during public consultation on the draft SEP. Copies of GGN shall be available at Municipal/City Noticeboards and Local Municipal offices (Mesna zajednica) during the land acquisition stages, and once the works begin, the copies of CGN will also be available at all site offices for the Contractor and the Supervising Engineer.

The CFD shall be established and effective within 30 days upon disclosure of final SEP. Within the same period suitable qualified and Project knowledgeable persons shall be appointed, to act as reach out specialists and CFD members. The CFD will be supported by the CET who have been responsible for stakeholder engagement and land acquisition within KS in the processes so far, as noted in chapter 1.3 of this report. The CET currently employs 15 experts. Individual responsibilities within the department itself will be assigned separately and included in future information packages. Within the department one person shall be appointed as an outreach specialist to oversee the stakeholder engagement and grievance management, coordinate activities as per the schedule and list of activities. The CFD procedure will help to improve the Project social performance since the number and nature of the received complaints is an indicator of the manner in which the Project is conducted.

Given the spatial dimension i.e. location of each of the Sub-Projects, it has been agreed that the CFD shall have one member, and a corresponding replacement member to act in their absence, from Koridori Srbije appointed to act as a permanent member with authorities exercised over all activities. Another member shall be a representative from the Local Municipality/City impacted by a specific Sub-project or geographically connected group of several Sub-Projects. The third member will be representing the PAPs from the immediate area of impact (best practice has proven that well known, respected and well absorbed members of the local community serve as most effective members). This means the third member will be either the secretary of the local municipal office (Mesna zajednica) or a representative of the PAPs and local community chosen in consultation and agreement with the community.

8.1 Grievance Procedure

The grievance procedure is designed to be effective, easy, understandable and without costs to the complainant. Any grievance can be brought to the attention of the CFD personally or by telephone or in writing by filling in the grievance form (by post, email or personal delivery) to the addresses/numbers given below:

KORIDORI SRBIJE D.O.O.

Kralja Petra 21, 11000 Beograd

Tel: +381 -11- 33-44-174

e-mail: zalbena@koridorisrbije.rs

All grievances will be recorded in the Grievance Log register and assigned with a number, and acknowledged within 3 days. 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. Additionally, all grievance can be registered anonymously. Each grievance will be recorded in the register with the following information:

- description of grievance,
- date of receipt acknowledgement returned to the complainant,
- description of actions taken (investigation, corrective measures), and
- Date of resolution and closure / provision of feedback to the complainant.

The CFD will make all reasonable efforts to address the complaint within 14 days upon the acknowledgement of grievance. If the grievance/complaint is vague and not clear enough, the CFD is obliged to help and provide counsel and even help in redrafting the submission, in order for the grievance/complaint to become clear, for purposes of an informed decision by the CFD, in the best interests of persons affected by the Project. If the CFD is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified and communicated to the complainant. The decisions shall give a clear assessment on the grievance/complaint, clear ruling and recommendations for fair remedy and propose measures to modify future conduct that caused the grievance as well as proposed measures to compensate if mitigation measures cannot remedy the harm or injury. The decision shall be in writing and shall be delivered to the person who filed the grievance as well as to any other person or entity to which the recommendation and measures shall apply or is under obligation by Law. The person who filed the grievance can express his/her personal satisfaction to the outcome of the grievance resolution procedure.

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.

At all times, complainants may seek other legal remedies in accordance with the legal framework of Republic of Serbia at any time.

The CFD will publish one intermediate report on the number and type of grievances received, comments addressed and closed-out, disaggregated by gender and type of grievances/comments every 6 months after establishment and one final report after completion of works. Although formal taking over of works shall be recorded the CFD shall be kept operation during the Defect Notification Period for each contract for construction/rehabilitation works.

During the Construction Phase the Contractor shall, as per requirements of the national law and provisions of the contract for construction works, assign the role of a Grievance officer to complement the existing grievance mechanism. The CFD and the Contractors grievance officer shall liaison closely and publish reports on grievances jointly semi-annually following the procedure and tools, and covering the range of stakeholders as designed in this SEP.

The Contractors will be responsible to set up their own grievance procedure in line with their quality control, however the works contract will include guidelines for the grievance management to correlate with the requirements of this SEP. In terms of reporting, the Contractor will be expected to report monthly to the Supervision Consultant within their progress reports on the grievances recorded and the update on the redress of grievances. The template of the report shall be agreed between the parties and approved by KS. Following the review of the progress reports the CET will follow –up on individual complainants and verify that measures and actions as described in the report have actually been implemented. The Contractor will maintain an updated Grievance log with details of each grievance received (date, name, merits of the grievance).

The CFD will be applicable to all Project activities and relevant to all local communities affected by project activities implemented within individual sections.

The CFD shall be responsible for receiving and responding to grievances and comments of the following two groups:

- A person directly affected by the project including the impact due to land acquisition, resettlement and rehabilitation measures,
- Residents interested in and/or affected by the project living in the affected communities.

The CFD shall publish an easy readable GGN at minimum containing the following information: a simple overview on the respective role of the CFD, domain of authority, contact details, flowchart of a grievance, grievance contact information (where and how).

A separate grievance mechanism will be available for workers.

Grievance Form is provided in Appendix A and a sample GGN is provided in Appendix B.

9 Monitoring of Stakeholder Engagement Activities

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;
- The minutes of consultation meetings are recorded and meetings logged in a register;
- Grievances are logged and tracked through to resolution within a timeframe of 14 calendar days from acknowledgement of receipt (evidenced by an up-to-date grievance register);
- Semi-annual Grievance Report to be prepared and made publicly available
- Contractors and subcontractor's contracts include clauses 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 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

Grievance Registration Form

APPENDIX 1 – SAMPLE GRIEVANCE FORM

Reference No: _____

Full Name

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent

First name: _____

Last name: _____

- I wish to raise my grievance anonymously
- I request not to disclose my identity without my consent

Contact Information

Please mark how you wish to be contacted (mail, telephone, e-mail).

- By Post: Please provide mailing address:

- By Telephone: _____

- By E-mail: _____

Preferred Language for communication

- Russian
- Ukrainian

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: _____

Please return this form to: [name], Health and Safety Manager, [company name],
Address _____: Tel: _____ or E-mail: _____@_____.com .

Appendix B

Sample Grievance Guidance Note

Do you feel the need to file a grievance ?

Construction of the Interchange Malca and connecting roads will be ongoing during the years 2019, 2020 and 2021. A Central Feedback Desk (Grievance Committee) was established in order to nourish communication with stakeholders and protection of their rights during construction works. This Guidance Note aims to explain the role and authority of the CFD.

KORIDORI SRBIJE D.O.O. Kralja
Petra 21, 11000 Beograd
Beograd, tel: 011/3344174
MZ MALČA Malča bb,

Sub-Project CONSTRUCTION OF MALCA INTERCHANGE

Guidance Note on how the Grievance Committee shall serve your best interest

What is the Grievance Commission? Is the Grievance Commission independent?

YES, the COMMISSION is an independent body composed of 3 members deciding on grievances filed by directly or indirectly Project affected persons including impacts from involuntary resettlement and land acquisition during construction works. The COMMISSION plays an important role acting as a mediator in disputes between the local communities and individuals and the Contractor.

Who are the members?

The COMMISSION has 3 members: 1 representative of the local community/ secretary of the Local Municipal office or other as elected/ 1 Representative of Koridori Srbije and 1 representative of the City Municipality Panтелеj.

How do you contact the COMMISSION?

- 1) You can file your grievance in writing or orally at the time when the commission members are present on site in Malča (once a week).
- 2) At the City Municipality of Panтелеj, if you go there assistance in filing your grievance shall be provided
- 2) Electronically by using the official e-mail office@koridorisrbije.rs.
- 3) By phone. Just call 011/3344174, or 018/201-241

When can you approach the COMMISSION?

At any time during the expropriation and/or during execution of construction works.

What can be root causes for your grievance?

The COMMISSION shall act whenever you feel your rights have been harmed.

In case you believe your daily activities have been disrupted by construction works, or damages inflicted, or you believe harm has been done in any other way, or you are concerned and about health and safety and in relation to involuntary resettlement and land acquisition.

CONTACT POINTS:
KORIDORI SRBIJE D.O.O
Kralja Petra 21
11000 Beograd
011/3344-174

CITY MUNICIPALITY PANTELEJ
Gutenbergova 4a
18103 NIŠ
018/ 201-241

MZ MALČA
Malča bb

What happens with your Grievance once filed?

The COMMISSION will confirm receipt of your Grievance immediately. Within 14 days your Grievance shall be decided upon, if resolution requires clarifications of your claims the COMMISSION shall contact you with the aim to clarify and provide assistance in providing a more comprehensive Grievance if needed. If for deciding a site visit should be required the COMMISSION shall do so without delay, confirming findings through minutes of site visit. The COMMISSION shall act impartially in line with the laws of the Republic of Serbia and the principles of the Resettlement Policy Framework and the Additional Guidance Note applicable for this Sub-Project. The decision shall be submitted to you without delay.

The main objective of the COMMISSION is to assist Project affected persons in efficient and outcome effective resolution of grievances attributable to the Sub-Project. Furthermore, it will act as a mediator in disputes arising from acts of the Contractor and other parties involved in implementation of the Sub-Project in the aim to minimize residual impacts, and avoid whenever possible instigation of lengthy and costly judicial processes.