

# STAKEHOLDER ENGAGEMENT PLAN

## GrCFW2 Belgrade Public Buildings

### Serbia



December 2021

# Contents

---

Contents .....	1
1 Introduction and Project Description .....	3
2 Objectives of the SEP .....	6
3 Summary of Previous Stakeholder Engagement Activities .....	7
4 Stakeholder Engagement Plan .....	8
4.1 Identification of Stakeholders .....	8
4.2 Overview of activities .....	9
5 Public Grievance Mechanism .....	13
6 Implementation of Stakeholder Engagement Activities .....	15
6.1 Roles and Responsibilities .....	15
6.2 Recordkeeping .....	15
6.3 Monitoring and Evaluation .....	15
A1 Public Grievance Form .....	17
A2 Regulatory Requirements .....	18
Legislation of the Republic of Serbia .....	18
EBRD requirements .....	18
Gaps Between National and EBRD Requirements .....	19

## Abbreviation list

CLO	Community Liaison Officer
EBRD	European Bank for Reconstruction and Development
EE	Energy Efficiency
E&S	Environmental & Social
EU	European Union
GCAP	Green Cities Action Plan
GrCF	Green Cities Framework
H&S	Health and Safety
KPI	Key Performance Requirements
NGO	Non-Governmental Organisation
PAP	Project Affected Person
PIU	Project Implementation Unit
PR	Performance Requirement
RS	Republic of Serbia
SECAP	Sustainable Energy and Climate Action Plan
SEP	Stakeholder Engagement Plan

# 1 Introduction and Project Description

---

The European Bank for Reconstruction and Development (the “EBRD” or the “Bank”) is providing financing to the City of Belgrade (the “City”) in amount of EUR 5 million to partially finance priority investments for the implementation of energy efficiency rehabilitation (“EE”) and structural measures in four public buildings in property of the City.

The proceeds will be allocated to the retrofit and refurbishment of following investment components:

- **Component 1:** The City Library (facility in Zmaj Jovina street)

The City Library was constructed in 1931. It consists of the Library main building and a small building in the courtyard, with the latest reconstruction done in 1991. The City Library is expected to be upgraded after implementation of EE measures to energy class C (and now is class E) with total final energy saving of 66% and primary energy saving of 32%.

Figure 1 The City Library



- **Component 2:** Institute for Student Health Care – facility of the Student Polyclinic

The building of the Student Polyclinic was built in the early 20th century and is in poor condition due to lack of adequate maintenance of all installations.

Following the implementation of the Project the building is expected to be upgraded from class D to class B and achieve final energy savings of 79% and primary energy saving of 60%.



Figure 2 The Student Polyclinic



**Component 3:** Institute for Student Health Care – facility of the Student Hospital

The building was built in the early 20th century as a residential building and after several reconstructions it was converted into a health care facility. The latest reconstruction of the building dates back to 2001.

The hospital is expected to be upgraded from class C to class B and achieve final energy savings of 46% and primary energy savings of 30%.

Figure 3 The Student Hospital



• **Component 4:** The Emergency Medical Institute of Belgrade

The Emergency Medical Institute of Belgrade complex consists of three buildings (Blocks A, B and C) with associated parking and access roads.

Following the implementation of the project the Emergency Medical Institute is expected to be graded as energy class C, with final energy savings of 49% and primary energy savings of 16%.

Figure 4 The Emergency Medical Institute



The Project is part of the Green Cities Framework (“GrCF”), a strategic and multi-project approach targeting environmental issues in selected large cities across the Bank’s countries of operation. In 2017, the City of Belgrade joined the EBRD’s Green Cities initiative. The obligatory Green Cities Action Plan (“GCAP”) and Sustainable Energy and Climate Action Plan (“SECAP”) were developed and adopted in early 2021.

The Project is categorised “B” in accordance with the EBRD Environmental and Social Policy (ESP) (2014).

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process for the Project. It outlines a systematic approach to stakeholder engagement which will assist City Administration, the Project Implementation Unit (PIU) and the Project 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 take into account the needs of particularly vulnerable groups. The document also includes a grievance mechanism for stakeholders to raise any concerns about the Project.

The responsibility for implementation of the Project and this SEP lies with the Project Promoter, namely City of Belgrade (City Administration), and the PIU. City Administration will closely 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 construction activities will be managed by the Contractors’ nominated Community Liaison 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 contracts. Prior to construction, the public and local community will be informed, through City of Belgrade and relevant municipalities websites, about the Contractor’s contact information and Community liaison officer.

The SEP will be periodically reviewed and updated, 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 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 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, as defined in the Table 1 below.

Table 1 Project Phases

<b>Phase</b>	<b>Status (Planned / Completed)</b>
Phase 1: Construction Phase	Planned
Phase 2: Operation and Maintenance Phase	Planned
Phase 3: Closure and Decommissioning Phase	Currently not planned

### 3 Summary of Previous Stakeholder Engagement Activities

---

Information on the City Administration operations, relevant news and company contacts are displayed on the official website. Through the website and media, the City Administration discloses information about its operations, local laws and regulations, contact details of all secretariats and departments, news, including upcoming and implemented projects, public documents, consultation meetings, etc. The City Administration issues a report on their operations semi-annually.

Submitting grievances to City Administration is enabled through multiple channels: by phone or via e-mails and by filling out a form available on their website (<https://www.beograd.rs/cir/pitajte-gradsku-vlast/>). The Belgrade Call Centre is a single information centre that serves to ease the communication of citizens and the City Administration, public utility companies and other city institutions under the jurisdiction of the City Administration. As per the Law on Free Access to Information of Public Importance, the public can submit requests for access to information of public importance.

City Administration has a designated department for second-instance administrative procedures, associated with legalization of buildings, urbanism, traffic and other areas, as well as inspections, education and child protection and social protection.

The City Administration regularly publishes surveys for the citizens to consult them on the matters related to the upcoming projects, e.g., the wagon external design of the future subway (<http://www.beograd.rs/lat/gradske-aktuelnosti/1785158-anketa-za-gradjane---izaberite-izgled-buduceg-metroa/>).

Regarding Project-related information dissemination, the City Administration has issued several notifications to the media.

In line with national requirements, consultations were organised in the process of adoption of relevant detailed regulation plans and urban planning projects:

- “Detailed Regulation Plan of the Block between the streets Knez Mihailova, Jaksiceva, Obilicev venac and Zmaj Jovina” includes the area of the City Library,
- “Detailed Regulation Plan of Boulevard kralja Aleksandra, section between Takovska and Sindjeliceva Streets” includes the area of Student Polyclinic,
- “Detailed Regulation Plan of the Block between the streets Beogradska, Krunska, Prote Mateje and Njegoseva” includes the area of the Student Hospital.
- Urban Project for the Reconstruction of the Building of the Institute for Emergency Medical Institute



## 4 Stakeholder Engagement Plan

### 4.1 Identification of Stakeholders

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 change 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 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 of European Integration</li> </ul>
Regional and Local Stakeholders – high interest, high local influence, high local power and locally important decision-making group	<ul style="list-style-type: none"> <li>• City of Belgrade</li> <li>• Municipality Vracar</li> <li>• Municipality Stari Grad</li> <li>• Municipality Savski Venac</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>• City Library with its governing bodies</li> <li>• Emergency Medical Institute with its governing bodies</li> <li>• Institute for Student Healthcare (as the operator of Student Hospital and Student Polyclinic) with its governing bodies</li> <li>• Users and workers of the City Library</li> <li>• Users and workers of the Student Polyclinic</li> <li>• Users and workers of the Student Hospital</li> <li>• Users and workers of the Emergency Medical Institute</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>• Residents of the affected municipalities</li> <li>• NGOs</li> <li>• Local Media</li> <li>• Prospective Contractor(s) and subcontractor(s) and their workers</li> <li>• Prospective Supervision Consultant(s) for supervision of construction works and their workers,</li> <li>• EBRD</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</li> <li>• Elderly/Pensioners</li> <li>• Persons with disabilities</li> <li>• Minority communities</li> </ul>

## 4.2 Overview of activities

City Administration will publish a grievance form and contact details for submitting grievances, on the City of Belgrade website (<https://www.beograd.rs/>).

In line with the construction timeline, the City Administration and the PIU will organise meetings in local municipalities, to present the planned construction works, safety risks 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, website of the City of Belgrade, in the affected buildings and as recommended by local communities (e.g., through letters, leaflets, announcements on bulletin boards, by phone).

Project leaflets will be developed and disseminated to the users of the affected buildings and in the affected communities, before the commencement of construction works. The leaflets will include a brief overview of the Project, dates when the works are expected to start, possible construction-related nuisances, information on the changes of operation mode of the affected buildings, 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.

City Administration 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).

City Administration, Secretary for Investments and the PIU 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 phases (Construction, Operation and Maintenance) is presented in the Table 2 below.

Table 2 Stakeholder Engagement Plan

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
<b>Construction Phase</b>							
1.	Grievance Mechanism	Users and workers in the affected buildings, Affected communities, public	30 days after formal approval of the Project by the Bank	City Administration, Secretary for Investments and the PIU	Distribution of Public Grievance Forms on public notice boards in the affected local communities and on the local communities' websites, during consultation meetings. City of Belgrade website	Enquiries and comments during meetings and via City Administration designated channels of communication. Response via official correspondence	Notification of Grievance Mechanism disclosure as published in affected municipality and websites and other advertising areas Grievance register
2.	Notify stakeholders on the implementation Program and changes in the operation mode of the affected buildings	Users and workers in the affected buildings, Affected communities, public	At least starting from 30 days prior to construction. One-off	City Administration, Secretary for Investments and the PIU	Meetings in affected municipalities Announcement on websites of City of Belgrade and in the affected buildings, and at premises and main public places of the affected municipality. Mass media (local newspapers, TV channels, radio, social media), leaflets	Enquiries and comments during meetings and via City Administration designated channels of communication. Response via official correspondence, e-mail.	Minutes of meetings, attendance logs, photos Press clippings Notifications as published in the affected municipalities and websites Leaflets
3.	Disseminate information about anticipated construction activities to affected communities and keep stakeholders informed of any project or construction-related activities	Users and workers in the affected buildings, Affected communities, public	From commencement of works in frequent intervals for stakeholders to get accustomed to receiving information	Contractor City Administration, Secretary for Investments and the PIU Community Liaison Officer (CLO) of Contractor(s)	Meetings in affected municipalities Announcement on websites of City of Belgrade and in the affected buildings, and at premises and main public places of the affected municipality. Mass media (local newspapers, TV channels, radio, social media)	Enquiries and comments during meetings and via City Administration designated channels of communication. Contractor's Community liaison officer (CLO) Via information boxes to be installed at construction site	Minutes of meetings Press clippings Notifications as published in the affected municipalities and websites Written correspondence with relevant authorities and organisations

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
	that might affect them					Response via official correspondence	
4.	Disclose information on project Environmental and Social construction performance.	Users and workers in the affected buildings, General Public	Semi-annually	City Administration, Secretary for Investments	City of Belgrade website	Enquiries and comments via City Administration designated channels of communication.	Notifications as published on website
5.	Particular effort with regards to notifications identified vulnerable groups	Vulnerable groups/persons	As assigned under each respective item	City Administration, Secretary for Investments and the PIU with assistance of external specialist as needed (sign language specialist, gender specialist etc.)	In addition to communication tools described in points 1 through 4, 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. Illiterate or partially literate persons will have documents read out loud in presence of an entrusted third person and sign language knowledgeable person if needed will be present for hearing impaired persons.	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.	Minutes of meetings  As described in points 1 through 4

No	Activity	Stakeholders	Timing and Frequency	Responsibility	Communication/ Media tool	Opportunity for Stakeholder Comment	Records
<b>Operation and Maintenance</b>							
6.	Disseminate information about transition of responsibilities and liabilities from Contractor(s) to City of Belgrade and resuming the normal function of the buildings	Affected communities, Project affected persons, General public.	At least starting from two months prior to termination of works	Contractor and City Administration, Secretary for Investments and the PIU	Contractor's Community Liaison Officer City of Belgrade website, official correspondence, mass media, local noticeboards and premises of municipalities.	Contractor's Community liaison officer City of Belgrade website	Notifications as published in the affected municipalities and websites



## 5 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 was previously mentioned, City of Belgrade has multiple channels for submitting grievances related to their specific activities.

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 City of Belgrade website, at local municipalities' notice boards and at the site offices.

The reception of grievance should be formally acknowledged through a personal meeting, phone call, email or letter as appropriate within 14 working days from submission. 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. 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 are implemented to deal with the issue. If they are unsatisfied with the proposed action or with the final outcome, the complaint should be reviewed once again. The response should contain an explanation on how the person / organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory. 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 grievance resolving process is presented in the Figure 4 below.

All grievances 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:

- 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.

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).

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

Grievances in relation to construction activities will be addressed by 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 the City of Belgrade. The Contractor will have Community Liaison Officer (CLO) appointed, who will be responsible for liaising with local municipalities, collecting their grievances related to construction activities and grievance

management. Grievance management will be contained in monthly reports to the Supervision Consultant, and further to City Administration 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.



Figure 5 Grievance Resolving Process

## 6 Implementation of Stakeholder Engagement Activities

---

### 6.1 Roles and Responsibilities

The implementation of the Stakeholder Engagement Plan is the responsibility of City Administration of the City of Belgrade, and the PIU. The Secretariat for Investments within the City Administration has the operational role for the project implementation on behalf of the City.

Certain activities from the SEP are expected to be implemented by the Contractors.

- City Administration of the City of Belgrade, and the Project Implementation Unit (PIU) – overall responsibility for SEP implementation
- Contractor's Community Liaison Officer (CLO) – disbursement of information to the community, grievance collection and management related to construction activities
- Supervision Consultant – reports on grievances received by the Contractor's Community Liaison Officer (CLO) in monthly reports to PIU and City

### 6.2 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
- 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.

### 6.3 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 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 (evidenced by an up-to-date Grievance Log 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.

- Supervision Consultant's monthly reports include summary of the contractor's 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.

# A1 Grievance Form

<b>Reference No:</b>	
<b>Full Name</b>	
<b>Contact Information</b>  <b>Please mark how you wish to be contacted (mail, telephone, e-mail).</b>	<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: (to be filled in once the contact person is appointed)**

Attention:  
 [name]  
 [Department]

Postal Address:  
 Telephone:  
 E-mail address:



## A2 Regulatory Requirements

---

### 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...52/2021).

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).

### 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, particularly with 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.

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.

## **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 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 compared 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.