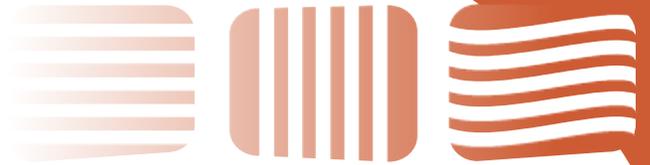


Belgrade, November 2021



SEURECA  **VEOLIA**

REPORT

Non-Technical Executive Summary of the RWCM Rančevo, Sombor

Client: EBRD and AFD

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

Title: **Non-Technical Executive Summary of the RWCM Rančevo, Sombor**

Client: EBRD and AFD

Developed by: dr Milica Karanac, Vukica Popadić-Njunjić, dr Slobodan Cvejić, Olivera Vuković, Miloš Tišović, Tijana Veljković

QA/QC: Dušan Nedeljković

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Abbreviations and acronyms

A&A	Description
AFD	French Development Agency
CAS	City Administration Sombor
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESAP	Environmental and Social Action Plan
ESAR	Environmental and Social Appraisal Report
EU	European Union
H&S	Health and Safety
ISO	International Organization for Standardization
MBT	Mechanical biological treatment
OHS	Occupational Health and Safety
PAP	Project Affected Person
PIU	Project Implementation Unit
PPE	Personal Protective Equipment
PR	Performance Requirement
PUC	Public Utility Company
RS	Republic of Serbia
RWMC	Regional Waste Management Center
SEP	Stakeholder Engagement Plan
ToR	Terms of Reference
TS	Transfer Station

1 INTRODUCTION

The European Bank for Reconstruction and Development ("EBRD") and the French Development Agency (AFD) ("the Banks" or "the Lenders") are considering providing a sovereign loan of up to EUR 100 million to the Republic of Serbia to finance critical improvements in the solid waste management system across several secondary cities in the country, which includes construction of the RWMC Sombor.

The planned RWMC Sombor is located on the territory of the City of Sombor which belongs to the West Bačka Administrative District, on the territory of the Autonomous Province of Vojvodina in the Northwest part of Republic of Serbia (Figure 1).

RWMC is planned between the body of existing non-sanitary landfill and the local municipal road. There are no residential buildings in proximity of the subject location. The closest settlements are Bilići and Rančevo which are both about 1000 m away, south and north from the Centre, respectively (Figure 1). The RWMC is located 11.5 km from the City of Sombor, and from the northern city bypass 6 km.

RWMC will provide waste management for the City of Sombor and municipalities Apatin, Kula, Odžaci i Bač in the Western Bačka Region.

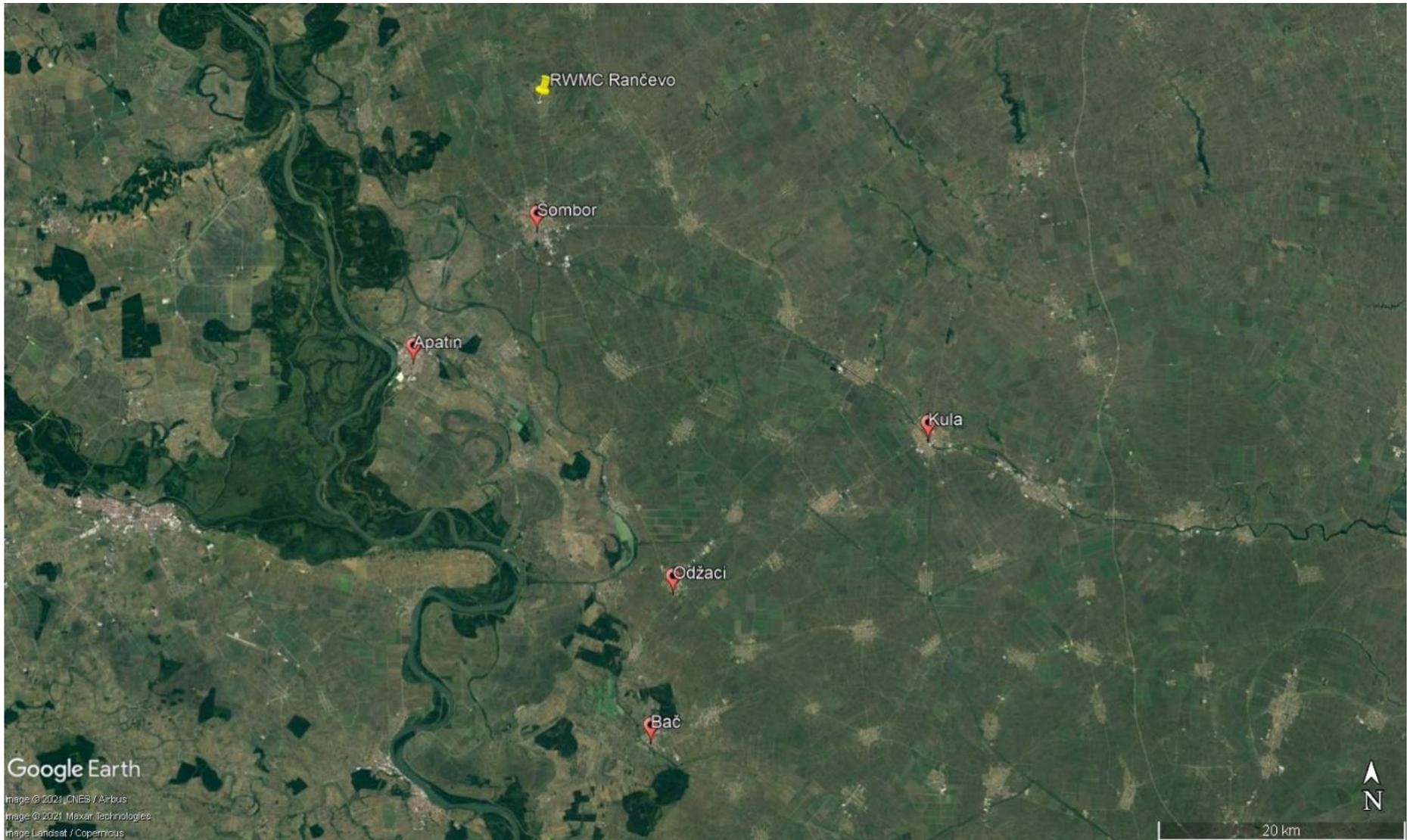


Figure 1 Macro location of the Project
(Source: Google Earth)

2 PROJECT DESCRIPTION

The main scope of the Project listed in the documentation provided is the construction of the Regional Waste Management System within the existing complex of non-sanitary landfill "Rančevo" in Sombor, including the construction of mechanical – biological treatment (MBT) plant with associated facilities and disposal of mixed and packaging communal waste.

Following facilities expected to be constructed as a part of the RWMC. Structures for receiving and storing of waste from citizens and industrial facilities. Facility for waste treatment including:

- sector for mechanical treatment of waste,
- sector for biodrying of waste,
- sector for production of SRF,
- sector for manual sorting of primarily separated packaging waste,
- sector for pressing and storing of material,
- auxiliary structures that enable functioning of the RWMC.

Although some of the available Project documentation (Detailed regulation plan for expanding the capacity of the landfill in Rančevo - waste treatment center) informs that sanitary cassettes are planned to be constructed, Building Permit, EIA Report and Feasibility Study do not include information about construction of sanitary cassettes, nor provide assessment of related E&S impact. Available documentation and information suggest the construction of the sanitary cassettes is not planned as part of this Project, but as a separate investment.

"Project description Sombor" document suggest that construction of three transfer stations will be a part of this project. However, available project documentation does not provide information about transfer stations. Available documentation and information provided suggest that local self-governments will be responsible for the provision of transfer stations.

The technical solution envisages the installation of a solar photovoltaic power plant on the buildings, on the canopies. 1724 PV solar photovoltaic panels, each with a power of 285 Wp, are planned to be installed on the roof surfaces.

To supply the external and internal hydrant network, buried reinforced concrete fire-fighting tanks with a total volume of $V = 3 \times 300 = 900 \text{ m}^3$ are planned. This volume provides a fire reserve of 864 m³ of water of 20 l / s for 12 hours.

The project envisages separate atmospheric sewerage networks for clean atmospheric water and oily atmospheric water. For oily atmospheric water from traffic areas, a special sewer system with an oil separator with a precipitator is planned.

As there is no built-up municipal wastewater collector in the complex and in its vicinity, the treatment of waste sanitary-wastewater in a compact biological treatment plant is planned.

Leachate will be generated in the process of biological drying, during the decomposition of the biological share of waste (2 m³) and from the biofilter (0.5 m³). These wastewaters are treated within the complex and are discharged into the existing canal as treated.

Mechanical-biological treatment of waste emits evaporated water into the air, which is treated with biofilters.

The planned total number of employees in the complex in two shifts is 54 (42 employees in the first shift and 12 in the second).

3 BACKGROUND

3.1 History of the Project development and planning

Currently, the collected municipal waste from the City of Sombor and from the municipalities in Western Backa are disposed of at the city landfill "Rančevo". Limited quantities of industrial, construction and bulky waste are disposed of at the landfill as well.

The Municipality of Sombor itself manages the landfill which is entrusted to PUC "Čistoća". Municipal waste for the entire city of Sombor (approximately 32,000 individual users and about 2,500 businesses and legal entities) is brought to the "Rancevo" landfill. The landfill also receives waste from individual users and other legal entities, who transport waste to the site using their own vehicles.

The complex has electricity and video surveillance on site. The landfill in Sombor is equipped with office premises, restroom facilities, a porter's lodge, a canopy for all machine equipment, leachate channels and an embankment that forms the body of the landfill.

3.2 Current environmental and social situation and considerations

Air Quality

There is no information on air quality for the location of the RWMC.

The last publicly available report on air quality from May 2021 for the measuring point in the city of Sombor, classifies air quality as satisfactory for SO₂, NO_x and soot, but not satisfactory for PM₁₀. However, exploitation of the non-sanitary "Rančevo" landfill has significant negative impact on the air quality in the area, especially during the summer period. The most prominent air pollutants from landfills, are nitrogen and sulfur oxides, dioxins, furans, dust and heavy metals. It can be assumed that landfill gas is also present as a by-product of the process of decomposition of landfilled waste, which contains about 50% methane.

In addition to emissions, unpleasant odors are present, which affect the quality of life and potentially health of the population in the immediate vicinity of the landfill.

Environmental Noise

Project area is located between settlements Bilić and Rančevo. The closest houses at settlement Bilić are located at approximately 1000 m from the Project location, while closest houses at Rančevo settlement are at the distance of approximately 600 m from the edge of the Project location area.

Currently, the main sources of noise are traffic from nearby local roads and traffic generated by the operations on the Rančevo landfill.

No data is available on the environmental noise levels within the landfill wider area.

Biodiversity

The subject area defined in the Detailed Regulation Plan for the expansion of the landfill capacity in RWMC Rančevo ("Official Gazette of the City of Sombor", No. 4/20) is located within the area for which the protection procedure has been initiated by the Ministry of Environmental Protection, as a part of the protection of the upper course of the Mostonga River in Bačka, landscape of exceptional features.

The subject zone belongs to a wider ecologically important area No. 4 under the name "Slatine Severne Bačke". It also belongs to the internationally important area for plants (IPA / Important Plant Area) called "Severna Bačka I".

According to the Study - Landscape of Outstanding Features of "Gornja Mostanga", one of the most widespread communities on the salt marshes of Bačka, in the vicinity of the existing landfill, is the community of softwoods (*Hordeetum hystricis*) which develops on moderately saline and slightly nitrophilous soils degraded by grazing and anthropogenic impact. Significant species and subspecies of flora are found on pastures and meadows between the ranch settlement Rančevo and the settlement Bilić.

The construction of a regional waste management center is planned on the habitat of protected and strictly protected wild species which belongs to the priority types of habitats for protection. Numerous strictly protected and protected species of national and international importance exist in these habitats. Although the construction will not be undertaken directly in the protected zone, in the neighbouring land plots the Project could have an indirect impact on the protected areas, therefore Biodiversity Management Plan will have to be prepared based on the detailed biodiversity surveys of the Project area.

Cultural Heritage

In line with the available documentation, there are no protected immovable cultural heritage assets as well as assets registered for protection at the locations in question and in the immediate vicinity.

Soil Quality

As the existing landfill has no impermeable lining, it can be assumed that soil quality is affected in the area. No soil quality baseline for the Project location has been performed.

Surface and Groundwater

The nearest river is Danube located some 15 km west. Groundwater table is expected at around 4.5 m. No data concerning groundwater quality at the location is available.

Worker and public health and safety

The area of the "Rančevo" landfill is only partially fenced and access is not fully controlled, therefore it presents a certain risk for the local community. However, as the area is located at a 500-1000m distance from the nearest residential housing, from the access point of view it does not represent a major risk. Controlled access and external security are planned during

future operation of the RWMC and similar provisions should be implemented during the construction period.

Unregistered waste pickers are present at this location (expected at all other non-sanitary landfills in this region) and it can be considered that their health and safety is at risk and potentially affected due to deteriorated environmental conditions at this non-sanitary landfill, including presence of uncontrolled air emissions (including landfill gas).

Based on the information available, workers of the PUCs currently operating in relevant municipalities are mostly equipped with the PPE and other working equipment. However, there was no evidence that workers are provided with the PPE masks to minimize impact of air emissions and dust on their health.

Social Issues

The location where the construction of the RC is planned is uninhabited. The nearest buildings of the surrounding hamlets / estates are about 600 m away, and the nearest settlement is Bilic, 1 km away. The only vulnerable group that could be affected by the project, indirectly through closure of local unsanitary landfills, are the informal waste pickers. They were spotted during the Consultant visit, but the assessment that selection of secondary raw materials is rather symbolic and conducted by unregistered waste pickers' indicates that the number of informal waste pickers and their activity is of a small scale.

4 EIA PROCESS

4.1 Conducted EIA Process and public consultations

For the Project, city of Sombor, department for agriculture and environmental protection has issued approval on the EIA Report no. 501-122/2020-XI from 27.7.2020. The EIA process has included mandatory public consultation and in line with the decision on EIA Report approval no comments from stakeholders were received.

The Project has received building permit, meaning that competent authority, Department for spatial planning, urbanism and construction, has confirmed, among others, that Design for construction permit is in line with EIA Report.

4.2 Spatial Planning

In February 2020, the Sombor city council has adopted Detailed Regulation Plan for the expansion of the landfill capacity in RWMC Rančevo ("Official Gazette of the City of Sombor", No. 4/20). In line with the requirements of the Law on planning and construction, spatial planning documents are subject of public consultations. Information about public consultations were announced at the City of Sombor official website as well as in local newspapers. However, there is no available information whether comments from interested public were received and how they were addressed.

5 SUMMARY OF ENVIRONMENTAL AND SOCIAL POTENTIAL ADVERSE IMPACTS

Overall long-term Project impacts are expected to be positive. Construction impacts will be temporary and location specific and are not expected to have significant environmental and community impacts if adequate mitigation measures are timely defined and implemented. Although during operation of the RMWC, it will generate impact, it is not expected that they will be significant, if environmental and social prevention and mitigation measures are implemented. However, some environmental impacts relevant to construction and use of the sanitary cassettes (not a part of this Project) for deposition of waste at RWMC, and closure of existing non-sanitary landfill Rančevo could potentially have significant impact on the environment if not managed adequately and aligned with environmental, community and social-related regulations and Lender's requirements.

Summary of main impacts and their characterisation is presented below. Complete list of impacts is presented in Environmental and Social Appraisal Report (ESAR).

5.1 Impacts during construction phase

Magnitude of most construction impacts is low/medium due to the fact activities will be performed within a limited area. Only activities that will be conducted outside the Project area, or where impacts may extend off-site are characterised with medium magnitude, on groundwater and surface water. The exception is public and workers health and safety aspects due to high-risk work in demolition and operation with construction machinery.

Significance of the impact is established by the portion of the environment and community that will be affected and potential level of impact. Most of the impacts' significance are assessed as low and medium. The majority of impacts during the construction phase are limited to the construction location where there is no residential housing.

Following impacts are assessed as potentially high impact significance:

- Health and safety aspects of operations are with higher risks, where outcomes may be light and heavy injuries or fatalities (both occupational and community health and safety).
- Impact on surface water and groundwater as a result of the potential spillage during the construction phase, although low in magnitude, could potentially have high significance due to potential of hazardous materials to significantly pollute surface and groundwater even in case of small spillages.
- Impact on biodiversity, although limited in time and space during the construction phase, needs to be additionally assessed to confirm the significance (potentially high), due to the Project area being located in the nationally and internationally important areas, with potential presence of protected and strictly protected species and their habitats.

Most of the impacts are characterised as **reversible**, due to the sheer nature of the impact, except the following:

- removal of topsoil. As detailed in previous chapters, the soil in the Project area is on the construction land, and it is not used for agriculture purposes;

- waste generation is irreversible; however, re-use of waste will be an option assessed once waste characterisation is performed;
- spillage of pollutants and hazardous materials into ground and surface water. However, these are all small quantities and significant impacts on surface or ground water is not expected;
- Construction works in the area of RWMC could have irreversible impact on biodiversity, especially if not managed properly, due to the potential presence of protected and strictly protected species.
- Health and safety aspects of operations are with higher risks, where outcomes may be light and heavy injuries or fatalities.

Extent of impacts is mostly localized on construction site.

Generally, the **duration** of these impacts is limited to the demolition and construction phase. At this point, there is no information on how long this phase will last.

5.2 Impacts during operation and maintenance

The **magnitude** of most operation and maintenance impacts will be low and performed on the limited area, mostly within the RWMC. The exception is traffic safety management during operation which is recognized as medium magnitude, as it goes out of the immediate area of the RWMC. Collection and transport of waste generated in the region will have an effect on the traffic safety on local roads.

Significance of the impact is established by the portion of the environment and community that will be affected or scale of possible effect. Due to the limited scale of the Project, most of the impacts will be low to medium significance. The majority of negative impacts during operation are limited to the operation site, given that RWMC is located away from the nearby communities (Bilic 500 m, Rančevo, 1000 m, City of Sombor 6.5 km), and in the area where there are sensitive receptors in immediate vicinity (schools, kindergartens, hospitals, culture and entertainment centres, etc.).

Following impacts are assessed as **medium significance**:

- Surface and groundwater pollution due to accidental spillage of hazardous materials/fuels/lubricants. Although these types of accidents could possibly have significant impact, these are all small quantities and significant impacts on surface or ground water is not expected. Therefore, it is assessed as low/medium.
- Possible negative impacts with medium significance on the environment and human health could occur due to inadequate management of different types of waste during RWMC operation (mixed municipal waste, metal and other recyclable waste, hazardous waste in mechanical treatment processes, sludge from the wastewater treatment process, wood (wood chips), biodegradable part of waste after biological treatment and waste from grease and oil separator precipitators);

High significance is allocated to following impacts

- Access of affected communities to safe disposal of municipal waste.
- Overall positive impacts on environment as a result of project implementation.

- Potential impact of occupational health and safety incidents during operation and maintenance could be assessed as high depending on the severity of injury. However, implementation of OHS national legislation requirements, as well as international and good industry OHS standards, should limit possible impact on occupational health and safety.
- Possible impact on traffic safety management on local roads during operation of the RWMC (collection and transfer of collected waste) is assessed as high, due to level of expected waste transport traffic and sensitivity of recipients (all community members regarded as sensitive). Through adequate traffic management, education of waste truck drivers and affected communities these impacts are expected to be controlled.
- At the time of writing the report, there were no information about the timeline for construction of sanitary cassettes, including presence of impermeable layer, leachate and landfill gas control. If sanitary cassettes are not constructed in line with relevant standards (including provision of leachate and landfill gas control) before the start of RWMC operation, potential environmental (and safety) impact from uncontrolled landfill gas release and lack of leachate collection and treatment could be very high.

When it comes to **reversibility** of the impacts, number of possible impacts are regarded as irreversible:

- Waste generation is irreversible, however it can be limited if waste is re-used;
- Pollution caused by spillage of pollutants and hazardous materials into ground and surface water. Accidental spillage of fuels or lubricants stored in workshops (if there will be on-site vehicle maintenance) or from malfunctioning, although of accidental nature and low magnitude can have irreversible impact on environment. As already mentioned, these are all small quantities and significant impacts on surface or ground water is not expected;
- Similarly, inadequate management of sanitary sewage, wash-off from the RWMC plants maintenance and oily atmospheric water could lead to irreversible impacts;
- Although occupational health and safety aspects are of lower risks compared to those identified during construction, OHS incidents have potential to be irreversible (fatality or disability) if OHS risks are not adequately managed;
- Similar to the above, possible impacts of lack of landfill gas control, as well as control and treatment of leachate from the sanitary cassettes (if not constructed before start of operation in line with relevant standards) are assessed as irreversible.

Extent of impacts is mostly localized on operation site, except when it comes to traffic safety management on local roads, related to the collection and transport of waste to the RWMC. Also, positive impacts to affected communities range from local to regional, improving access to services related to safe management of communal waste.

Generally, **duration** of these impacts is mostly as the life of the Project. At this point there is no information how long this phase will last. Some of the impacts duration is assessed as limited/accidental due to their accidental nature.

6 SUMMARY OF ENVIRONMENTAL AND SOCIAL MITIGATION AND MANAGEMENT MEASURES

6.1 Construction phase

This phase of the Project development foresees demolition of existing objects and construction of new facilities (Contractor). This phase is expected to be implemented by City Administration Sombor (CAS) with Project Implementation Unit (PIU) and Public Utility Company Čistoca Sombor (PUC), and support from the Ministry.

Obligations CAS/PIU/PUC:

- Establish ethical wall in permitting processes, to avoid conflicts of interest, given CAS is both investor and permitting authority in this Project;
- Procure services from licensed companies for demolition and construction works following standards of Public procurement regulations that have performance requirements of the lenders embedded;
- In Call for Proposal (CFP) for Engineer and Contractor, it is necessary to include all E&S requirements (as defined in the EIA Report, the ESAP);
- Establish monitoring and supervision of the implementation of Occupational Health and Safety measures, in line with applicable OHS regulation during construction and operation;
- Ensure construction of sanitary cassettes in line with national and international standards for landfill construction before the start of operation of the RWMC. Sanitary cassettes as a minimum should provide impermeable lining, leachate treatment and landfill gas control;
- Ensure safe disposal of generated waste in sanitary cassettes in line with applicable environmental regulation;
- Ensure in the shortest possible time the development of project documentation and rehabilitation of the existing non-sanitary landfill Rančevo (associated project), which has cumulative impacts on RWMC;
- Supervise the implementation of community safety and security measures during construction;
- Inform the public of environmental and OHS measures and monitoring results during construction work and preparatory works;
- Biodiversity survey of the area should be undertaken to inform biodiversity baseline, identify and map critical habitat and define Biodiversity Management Plan before the start of construction activities;
- Allocate budget for the above services.

CAS/PIU/PUC shall also be responsible for the following:

- Implementation of the requests for environmental protection provided by: State environmental authorities, Lenders and other institutions, Law on Environmental Protection ("Official Gazette of the RS", No. 135/04, 36/09, 72/09, 43/11, 14/16, 76/18 and 95/18);
- Implementation of the ESHS requirements in procurement documentation, ToR for construction and construction contract specifications;
- Environmental monitoring supervision via consulting services for environmental monitoring;
- Preparation of relevant (at least annual) reports on progress of implementation of environmental and health and safety (and social) requirements (national, international, Lenders, good international practice).

The Contractor is obliged to:

- The contractor will be responsible for implementing environmental and health and safety mitigation measures during preparation and construction works;
- The Contractor should appoint environmental and health and safety specialist(s) who will be responsible for day to day implementation and management of the Contractor's environmental and health and safety responsibilities;
- Establish environmental monitoring "zero stage baseline monitoring" (baseline for soil, air quality, noise, surface and groundwater quality) prior to the start of the works at RWMC, during the mobilization stage;
- Prepare the Contractor's Site-Specific Environmental and Social Management Plan (CESMP). CESMP to define detailed mitigation measures in line with requirements of EIA Report, ESAP, construction contract, EU Directives, Lenders requirements and good international practice;
- CESMP to include following sub-plans and procedures as a minimum: Organisational structure, roles and responsibilities for ESHS management; Labour Management Plan; Waste Management Plan; Pollution Prevention Plan; Biodiversity Management Plan; OHS Management Plan; Community H&S Management Plan; Design change procedure/plan; Supply chain Management Plan/procedure; Monitoring Plan; type of reports and reporting frequency;
- Biodiversity Management Plan to be developed before the start of construction phase, in line with findings of the biodiversity baseline surveys;
- The Contractor to prepare as a part of the CESMP or as a stand-alone document Health and Safety Management Plan;
- The Contractor will be responsible to develop Emergency Preparedness and Response Plans in line with requirements and risks identified in the EIA Report, ESAP before the commencement of works. Emergency Preparedness and Response Plan should be submitted to the Project Supervision Consultant for approval;
- Contractor shall perform all project activities following the Health and Safety Management Plan, national legislation and Lenders requirements regarding health and safety;
- Ensure safe disposal of generated waste in line with applicable environmental regulation;
- Pursuant to Article 109 of the Law on Cultural Heritage ("Official Gazette of the RS", No. 71/94, 52/11 (other law), 99/11 (other law)), the obligation of the Contractor and the Project is to, if he encounters an archaeological site or archaeological objects, he

shall immediately stop the works and inform the competent Institute for Protection of National Monuments and take measures so that the find is not damaged, destroyed and preserved at the place and position in which it was discovered;

- In accordance with the provisions of the Law on Waters ("Official Gazette of the RS", No. 30/10, 93/12, 101/16 and 95/18 (other law)), it is prohibited to discharge untreated wastewater into the environment and the final recipient;
- The Contractor will ensure that the budget for implementation of the required mitigation measures and monitoring activities defined in CESMP is included in Project costs as a separate item.

6.2 Operation and maintenance phase

This phase of the Project development foresees the operation of the RWMC and associated maintenance. This phase is implemented by City Administration Sombor (CAS) and Public Utility Company Čistoća Sombor (PUC).

CAS/PUC/Operator:

- Operator to establish Operations Management System in line with the internationally recognized standards (ISO standards 14001 and 45001 and its required documents, plans and procedures). Certification is not mandatory;
- Develop Operations Environmental and Social Management Plan (OESMP), which will include all necessary environmental and health and safety sub-plans/procedures before the start of operation;
- OESMP to include as a minimum following sub-plans and procedures: Waste Management Plan; Soil and groundwater contamination monitoring and management; Leachate treatment and monitoring; Pollution Prevention Plan; Biodiversity Management Plan; OHS Management Plan; Traffic Management Plan; Community H&S Management Plan; Security personnel requirements; Grievance mechanism; Information disclosure and stakeholder engagement; E&S Monitoring Plan;
- As a part of the Operations Management System, the Operator will establish Safety Management System which will ensure preparation and implementation of Emergency Preparedness and Response Plans in line with requirements set out in EIA Report, ESAP and under respective national and EU legislation;
- Operations Safety Management System and Emergency Response Plans will ensure coordination and communication between RWMC and relevant regional and national authorities in case of accidental situations;
- Develop organizational structure for the operations phase which will ensure that Operator will appoint experienced waste management, environmental and health and safety specialists, who's responsibilities will be implementation of the Operations Management System and all its pertaining parts;
- Waste management planning in the Regional Waste Management Center should be in line with the Waste Management Strategy;
- Establish regular environmental monitoring (air quality, noise, surface and groundwater quality, and soil quality) and update Monitoring Program of RWMC, in line with applicable environmental regulation;
- In accordance with the provisions of the Law on Waters ("Official Gazette of the RS", No. 30/10, 93/12, 101/16 and 95/18 (other law)), it is prohibited to discharge untreated wastewater into the environment and the final recipient;

- It is obligatory to regularly, quarterly, test the quality of wastewater at the point of discharge, through accredited laboratories, which are obliged to sample and test the quality of several different samples and to issue an Opinion on wastewater quality based on the obtained results;
- The Operator is obliged to manage waste in accordance with the provisions of the national and EU legislation, including all requirements and measures defined in the EIA Report and ESAP;
- Allocate budget for the above services;
- Another social impact related issue to be managed here is transparency in employment procedure. The Client will run employment process in an open way and in compliance with relevant laws.

7 COMMUNICATIONS

Below, general principle of grievance mechanism to be implemented is presented. Once regional waste management center is established as a new legal entity, exact information on contact persons for grievances will be published.

The Project Specific Grievance Mechanism shall be designed for the Project implementation and described in the SEP for all phases of the project cycle. Regional sanitary landfill for municipal waste at location Rančevo is key actor in the mechanism. Any person or organisation may send comments, complaints and/or requests for information in person or via telephone or email to the Regional sanitary landfill for municipal waste – The new established company. The Company director and the president of the Assembly are in charge for addressing all complaints and forward the complaints submitted by the public.

Project-related grievance will be collected during the pre-construction phase, during the implementation of construction works and also during the operation phase.

One of the most important principles is principle of anonymity. The mechanism will allow submission of complaints are raised anonymously. All information on the grievance holder will be treated with confidentiality.

Raising grievances will not incur any costs for the grievance holder. All grievances, whether they are received verbally or in writing, should be categorized and recorded in the Grievance Log Register. The Grievance Logbook will have all necessary elements to disaggregate the grievance by gender and location of the person logging it as well as by type of grievance.

The person/organization that submitted the grievance and expect answer should be provided with contact information of the person responsible for its resolution and the estimated time for completion. If any grievance cannot be addressed or if action is not required, a detailed explanation / justification will be provided to the complainant on why the issue was not addressed. The response will also contain an explanation on how the person / organization that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

All grievances will be responded to within 30 working days from submission. In case of delay, complainants will be notified about the reasons for the delay and the expected timing for when their grievance will be addressed. The proposed resolution should be confirmed with the complainant before implementation to minimize unnecessary/unwarranted actions. If they agree with the approach required actions are implemented to deal with the issue.

Completion of actions should be recorded in the Grievance Logbook.

Following the implemented actions, it should be confirmed with the complainant that they are satisfied with the outcomes. Any further response from the complainant should be in order to assess whether the grievance is closed or whether further action is required. If they are unsatisfied with the proposed action or with the final outcome, the complaint should be reviewed once again.

The implementation of the Stakeholder Engagement Plan is the overall responsibility of Regional sanitary landfill for municipal waste – The Company and Contractor Grievances in relation to construction activities will be addressed together with construction contractors.



Consultant:

ENVICO d.o.o. Beograd
Vardarska 19/IV
11000 Belgrade, Serbia
Tel: +381 11 64 17 257

Client:

EBRD and AFD