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# STAKEHOLDER CONSULTATION REPORT

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VERSION **v. 1.1**

RELATED SUPPORT –

**TEMPLATE GUIDE Stakeholder Consultation Report v. 1.1**

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This document contains the following Sections

Key Project Information

SECTION A – Information made available to Stakeholders

SECTION B – Invitations made to Stakeholders

SECTION C – Report of the Consultation Process

SECTION D – Continuous input / Grievance mechanism

SECTION E – Stakeholder Feedback Round

## KEY PROJECT INFORMATION

<b>GS ID of Project</b>	GS10641
<b>Title of Project</b>	VINCA Landfill Gas and Energy from Waste facilities
<b>Version number of the SCR</b>	Second version
<b>Completion date of version</b>	11/12/2020
<b>Time of First Submission Date</b>	24/01/2020
<b>Start Date of the Project</b>	30/09/2019
<b>Date of Meeting (s)</b>	20/12/2018 and 21/12/2018
<b>Project Cycle:</b>	<input checked="" type="checkbox"/> Regular <input type="checkbox"/> Retroactive

The Project Developer organized in December 2018 a 1st consultation (in the framework of lenders ESIA procedure), and two other consultations in 2019 and 2020 (in the framework of the serbian EIA procedure).

The present Stakeholder Consultation Report concerns the ESIA consultation.

The EIA consultations held in 2019 and 2020 are presented in section C.2.1 "other consultations".

As additional information for the VVB to illustrate the extent of the consultation process undertaken for the Vinca project., the following different elements concerning the EIA consultations are presented in Annex I and should be treated as confidential:

- Pictures of the meeting ;
- Invitations in English and Serbian ;
- Public Press Clipping ;
- Minutes of both Meetings.

## SECTION A. INFORMATION MADE AVAILABLE TO STAKEHOLDERS

### A.1. A non-technical summary of the project

Project Design, technologies, scale and objectives:

- **Objectives :**

At the Vinča landfill, located just south east of Belgrade approximately 12 km from the city centre and adjacent to the Danube, a typical non sanitary landfill has been formed during more than 40 years of operation.

The consequence of this landfill creation and operation has been the pollution of the waters of Ošljanski potok (Ošljan stream) and further Ošljanska bara (Ošljan pond), along with the contamination of the surrounding agricultural land and air.

**The current condition situation imposes a need for a planned solution of rehabilitation, as well as for expanding the existing Vinča landfill in line with good international practices.**

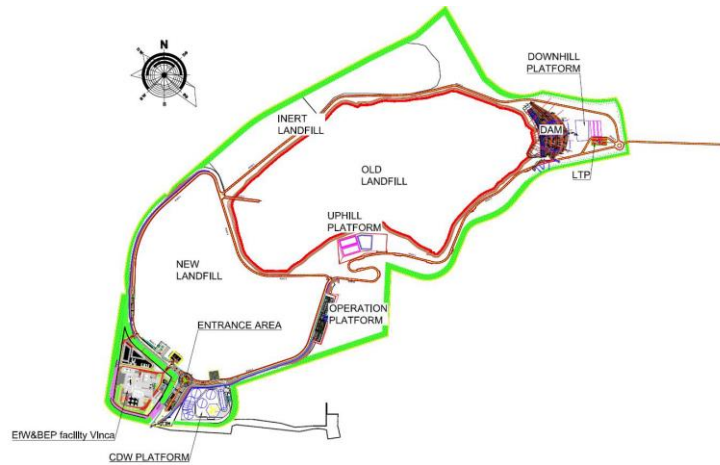
As a consequence, the City of Belgrade (CoB), represented by the City Secretariat for Environmental Protection, decided to procure residual municipal solid waste (MSW) treatment and disposal services through a long-term Public-Private Partnership (PPP) contract.

These services comprise the design, financing, construction, operation and maintenance of treatment and disposal facilities for about 510,000 tonnes per year of residual municipal solid waste and over 200,000 per year of construction and demolition waste.

- **Project Design and technologies**

The Project includes:

- Closing of the existing landfill site after remediation and stabilization with final capping
- A leachate facility, and a landfill gas treatment and energy recovery facility
- An Energy from Waste facility with the nominal combustion capacity of about 340,000 t/year of municipal waste, which will generate a combination of electricity (~192 GWh/y) and heat (~175 GWh/y)
- A sanitary landfill for the portion of municipal waste not processed at the EfW Facility i.e circa 170,000 t/year
- A landfill for the disposal of EfW residues
- A treatment facility for Construction & Demolition Waste (CDW) to produce recoverable inert CDW, recovery and storage of recoverable inert CDW
- An inert landfill for the respective CDW treatment residues
- The construction of a dam (supporting structure) at the downstream of the existing landfill
- A 35KV and 110 KV overhead Transmission Lines for connection of electrical energy produced in EfW and BEP and electricity supply and a heat pipe connection to the City District heating network



All parts of the project are designed in accordance with International Financial Institutions (EBRD, IFC) requirements and Serbian and EU regulations. The project will use conventional and proven technologies with a highly integrated management of run-off water, wastewaters, landfill gas, and waste in order to limit as far as possible any external outputs by promoting internal reuse.

- **Project scale**

Whereas, 340,000 tonnes of MSW per year will be incinerated in Energy from Waste plant producing electrical and thermal energy, 170,000 tons of MSW per year will be treated and disposed in a new sanitary Landfill that would be built as part of the Project. Over 100,000 tonnes per year of construction and demolition waste will be treated in a Construction and Demolition Waste plant.

The existing landfill – unsanitary dumpsite, Vinča landfill- will be rehabilitated and closed.

- Leachate waters from both the existing and the new landfills will be collected and treated in a Leachate Treatment Plant (Reverse Osmosis ). Landfill gas will be collected and recovered for the production of electrical and thermal energy in a Biogas Engine Plant.

- **Duration and implementation plan**

A Special Purpose Vehicle (SPV), BCEBEO ČISTA ENERGIJA D.O.O. BEOGRAD., (BCE) was formed in September 2017, to manage the Project.

The Project will be financed by loans from International Financial Institutions (IFIs) and is being developed to comply both with national legislation of the Republic of Serbia and environmental and social IFIs requirements, namely those of the International Finance Corporation (IFC) and the European Bank for Reconstruction and Development (EBRD).

The Detailed Planned of Regulation for the project was adopted on 25th September 2018 by the Belgrade City Assembly.

- **Consultations and Stakeholders' Participation**

The Project Developer organized in December 2018 a first consultation in the framework of Environmental and Social Impact Assessment (ESIA) procedure required by the lenders. Two other consultations were organized in 2019 and 2020 in the framework of the Environmental Impact Assessment (EIA procedure) mandatory under the Serbian Law.

The present Stakeholder Consultation Report concerns the ESIA consultation.

The EIA consultations held in 2019 and 2020 are presented in section C.2.1. as additional information for the VVB. The following different elements concerning the EIA consultations are presented Annex I and should be treated as confidential:

- Pictures of the meeting ;
- Invitations in English and Serbian ;
- Public Press Clipping ;
- Minutes of both Meetings.

## **A.2. Contact details to get further technical detail and project information**

### **BCEBEO ČISTA ENERGIJA D.O.O. BEOGRAD.**

Contact Person: Gordana Jelenic, Assistant to Managing Director

Address: Tošin bunar 272v, 11070 Belgrade, Serbia

Telephone number: +381 11 715 4885

**Email address:** bce@bcenergy.rs

## **A.3. Summary of economic, social and environmental impacts of the Project**

- **Presentation of the impacts :**

The positive and negative impacts of the project have been explained in a simple way during the consultations through a general summary table (see Annexe A).

- **Positive impacts contributing to the SDG:**

### ***Environmental impacts***

The Vinča landfill is currently used for the disposal of waste collected on the territory of thirteen municipalities together representing 90% of the waste generated on the entire territory of Belgrade.

The consequence of the creation and operation on the existing landfill has been the pollution of the waters of Ošljanski potok (Ošljan stream) and further Ošljanska bara (Ošljan pond), as well as contamination of the surrounding agricultural land and air.

The key environmental impact of the Vinca Project is the elimination of the currently uncontrolled leachate flow to the site downstream areas.

Therefore, the Ošljanski potok (watercourse) and further the Ošljanska bara (ponds / wetlands) will slowly recover from previous pollution when the current source of pollution will run out due to the leachate treatment plant and the old landfill remediation. This situation will improve the water quality (SDG 6).

Furthermore, the project will have a positive impact on the greenhouse gas emission (SDG 13), due to the production of renewable energy (electricity and heat production), and thanks to the recovery of landfill gas from the old and new landfills avoiding direct release of methane in the atmosphere (a greenhouse gas (GHG) 28 times more potent than carbon dioxide (CO<sub>2</sub>)).

The City of Belgrade will increase its waste landfill diversion and produce renewable energy, which makes the City more sustainable (SDG 11).

Also, the biodiversity will be improved through the controlled management of the old and new landfills and the creation of a green belt.

In addition, the Project developer (BeoCista Energija) will design and construct a Visitor Centre at the Site to receive visitors and introduce them to waste management in general and the steps taken at the site and the facilities to properly manage waste according to best industry practices. With this Visitor Center, the Project improves education, awareness-raising and collective knowledge about climate change (SDG 13), waste management and resource preservation.

### ***Economic impacts***

The project will provide job opportunities and economic benefits for the local population. It will create more than 520 jobs during the construction phase, and about 120 during the 25 years of the operation phase and even more indirect jobs (supporting services such as transport, etc.).

### ***Social impacts***

The construction of the green belt (fencing of the whole complex) and reduction of air pollution implied by the project will have positive influence on health, especially concerning child diseases, but also on the general quality of life of nearby inhabitants.

The potential negative social impacts of the project have been identified and presented as well during the consultation. The related mitigation measures have been discussed with the consultation's participants and the impacted populations.

The major social negative impact identified is the situation of the Roma families' settlement located at the northern part of the Landfill complex. Those families reside and work on the

landfill. They are collecting, sorting and selling different waste materials from the landfill to recycling companies that have their offices at the landfill site. Due to the project implementation, they need to be physically displaced, to free up the space and build designed facilities while however providing opportunities to improve their living conditions.

To respond to these issues a specific Resettlement Action Plan has been developed by the City of Belgrade and presented during the consultation:

## SOCIAL AND IMPACT MITIGATION MEASURES

### RESETELMENT PLAN FOR HOUSEHOLDERS LIVING IN INFORMAL SETTLEMENT LOCATED ON THE VINCA LANDFILL AS WELL AS FOR RESTORATION OF LIVELIHOODS OF WASTEPICKERS ON THE VINCA LANDFILL

In the norther part of the planned construction complex, near current fence for the landfill, the informal settlement is located. During the latest census, 17 householders is registered in this settlement.

#### Preparation of the resettlement plan

- By virtue of the Decision of the Mayor of the City of Belgrade, Working Group was formed responsible for the development and monitoring of the implementation of the Resettlement Plan
- Resettlement plan has been drafted in line with accepted international standards - IFC PSS, EBRD PR.5 legalisation of the Republic of Serbia, as well as principles of strategic documents currently defining the social inclusion policy framework in Serbia .
- During the period between 2014 and 2018, teams consisting of representatives from the Secretariat for Social Protection and the Centre for Social Protection collected data on households living in the informal settlement which will be resettled, as well as on the companies and individuals who engage in collection and sorting of secondary raw materials at the landfill. Based on collected data, social-economic survey has been performed which is integral part of Resettlement Plan.

#### The objective of the Resettlement Plan

The objective of the Resettlement Plan is to ensure a comprehensive approach to planning and other resettlement-related activities in connection to resettlement of households from the location of the „Vinča“ landfill, as well as to secure adequate living conditions for resettled individuals which fully reflecting human rights standards, as well as livelihood restoration for those whose incomes will be affected by the Project.

#### Providing place for living

- **Householders with place of residence on the territory of the City of Belgrade**
  - Construction (if the householders own only a land) or refurbishment of the house
  - Accommodation in already built apartment of the City of Belgrade
- **Householders with place of residence on the territory out of the City of Belgrade**

#### Other rights related to the resettlements

Help in obtaining of the personal documents, help with enrolment of children to school, assistance in exercising the right to social protection and social assistance, employment assistance and re-establishing the source of income.

#### Monitoring, evaluation and reporting

Monitoring of the implementation of the Resettlement Plan will be conducted by the Working Group in cooperation with all other actors involved in the implementation of the Resettlement Plan, at least two years after the resettlement or the termination of work of waste pickers.



## A.4. Other relevant information to help stakeholders understand the project

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As an introduction to the consultation meeting a short movie was projected to the audience to illustrate visually the environmental disaster at the Vinca Existing Landfill over the years due to massive fire outbreaks, landslides and direct leachate discharge into natural water courses.

Also the following table was explained listing all the Projects' Participants and detailing their responsibilities so as to ease the process of addressing the relevant parties when raising comments or complaints:

<i>Stage</i>	<i>Activities</i>	<i>Scope</i>	<i>Responsibilities</i>
<i>Pre-Construction</i>	<i>Land Acquisition</i>	<i>Vinca Complex &amp; 110kV and 35kV Electricity Connections</i>	<i>City of Belgrade</i>
		<i>District Heating Network</i>	<i>City / Beolektrane</i>
<i>Pre-Construction</i>	<i>Detailed Planned of Regulation (DPR)</i>	<i>Vinca Complex &amp; 110kV and 35kV Electricity Connections</i>	<i>City of Belgrade</i>
		<i>District Heating Network</i>	<i>City / Beolektrane</i>
<i>Pre-Construction</i>	<i>Construction Permit</i>	<i>Vinca Complex &amp; 110kV and 35kV Electricity Connections</i>	<i>Beo Čista Energija (BCE)</i>
		<i>Dam</i>	<i>City of Belgrade</i>
		<i>District Heating Network</i>	<i>City / Beolektrane</i>



<b>Stage</b>	<b>Activities</b>	<b>Scope</b>	<b>Responsibilities</b>
<b>Pre-Construction</b>	<b>Environmental Impact Assessment</b>	<b>Vinca Complex &amp; 110kV and 35kV Electricity Connections</b>	<b>Beo Čista Energija (BCE)</b>
		<b>District Heating Network</b>	<b>City / Beolektrane</b>
<b>Pre-Construction</b>	<b>RAP / LRP</b>	<b>Implementation of Resettlement Action Plan and Livelihood Restoration Plan</b>	<b>City of Belgrade</b>
<b>Construction</b>	<b>Engineering / Procurement / Construction / Commissioning</b>	<b>Energy From Waste</b>	<b>BCE / CNIM</b>
		<b>Landfill Gas Facility / Leachate Treatment Plant / Construction and Demolition Waste Plant</b>	<b>BCE / Suez Vinca Operator</b>
		<b>Landfill</b>	<b>BCE / EnergoProjekt Niskogradnja</b>
		<b>Dam</b>	<b>City / Dam Contractor</b>
		<b>District Heating Network</b>	<b>City / Beolektrane</b>
<b>Service</b>	<b>Operation / Maintenance and Monitoring</b>	<b>Vinca Complex &amp; Dam</b>	<b>BCE / Suez Vinca Operator</b>

Finally, many copies of the project Non Technical Summary (NTS) in printed format were made available to the audience in order to allow a quiet review after the consultation meeting.



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**SECTION B. INVITATIONS MADE TO STAKEHOLDERS**

**B.1. Invitation tracking table**

The complete names of invitees are present in the original invitation tracking table in the Minutes of Consultations, in Annex A.

Please complete the table below

Category Code	Stakeholder Type/Organization (if relevant)	Name of invitee	Male/ Female	Method of invitation	Date of invitation (>30 days before Meeting)
D	Ecological discipline	XXX.disciplina@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Serbian Youth	XXX@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Center for Conservation and Environmental Protection Association	XXXX@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Association "Civilnet"	office.civilnet@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Center for Monitoring and Evaluation	XXXmonitoring@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Center for natural resources Natura	XXX@icloud.com	N/A	EBRD website publication	12.10.2018.

D	Group for European projects	XXX@gmail.com	N/A	EBRD website publication	12.10.2018.
D	For a more beautiful Serbia	XXX@gmail.com	N/A	EBRD website publication	12.10.2018.
D	Student association of the Faculty of Biology	XXXbif@bio.bg.ac.rs	N/A	EBRD website publication	12.10.2018.
D	Healthy and Equitable society	XXX@yahoo.com	N/A	EBRD website publication	12.10.2018.
F	Gold Standard representative	help@goldstandards.org	N/A	Email	

Gold Standard has not been invited in the ESIA Consultation, because at the time of the consultation meeting only preliminary discussions were held with Gold Standard on the certification procedure and applicability to the Vinca project.

### **B.1.1.Appropriateness of methods**

In Serbia and even more in Belgrade, the local population has widely access to digital tools, which made e-mails and websites publications the most relevant ways to send the invitations. Nevertheless, in order to reach out to the largest possible population, the consultation communication was adapted and published in the newspaper. Paper copies of the documents were made available at office locations within Belgrade.

### **Respect of the local legal framework**

Furthermore, the attendees of the public consultation meeting were informed that the other public hearings would be performed in accordance with Article 20 of the Law on Environmental Impact Assessment ("Official Gazette of RS", No. 135/2004 and 36/2009) which stipulates that the competent authority provides public insight, organizes the presentation and conducts public discussion of the impact assessment study.

According to Article 28, the Competent Authority is obliged to inform the public about its decisions from Article 20 through at least one local newspaper in each of the official languages published in the area that will be affected by the planned project or activity.

### **B.1.2. Gender Sensitivity**

- **Invitation**

A map of the relevant officials was built, and the relevant ones were invited. An analysis of the impacted population has been developed in the ESIA Report. In this context, all identified inhabitants of the area, as well as the affected Roma populations were invited.

It was decided to send the invitations per e-mail and newspaper in order to reach the largest public as possible, including women.

- **Consultation Meetings**

Two different consultations have been organized with the goal of reaching the largest public as possible, including women. The ESIA Public Consultation meetings were held on 20.12.2018 and 21/12/2018. This was announced by/in the local media but also in the public community places and was held on 20/12/2018 in the Municipality of Grocka targeting local communities.

In addition, the first consultation was held at 17:00 / 5 PM , which was convenient for people who were coming after work.

In this context working women were able to attend the consultation meetings.

### **B.1.3. Evidence proving invites took place as stated**

The newspaper clipping of the ESIA consultation has been provided to the VVB as an Annex C.

### **B.1.4. Sample content of invites (for each Method above)**

The invitations content in Serbian is presented in the Annex D.



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**Text of individual invitations**

Subject: Invitation to attend a Public consultation

Dear representatives of the non-governmental sector,

In 2017, the city of Belgrade concluded a public private partnership contract \_\_\_\_\_. For the needs of a detailed consideration of the current situation and impact on future activities at the location of Vinča, Environmental and Social Impact Assessment (ESIA) for the VINČA ENERGY-FROM-WASTE FACILITY, CONSTRUCTION OF THE NEW LANDFILL AND REMEDIATION OF THE EXISTING LANDFILL was developed.

In this context, we are organizing a Public consultation, on Friday, December 20, 2018 at the premise of the Municipality of Grocka, Bulevar Oslobođenja 39 „Velika sala“, at 17.00. The agenda of the meeting in question is attached to this letter.

Insight into the document (in Serbian and English) is available at the following address:

<https://www.ebrd.com/work-with-us/projects/esia/belgrade-solid-waste-ppp.html>

<https://disclosures.ifc.org/#/enterpriseSearchResultsHome/belgrade%20wte>

Your active participation and knowledge of the matter from the perspective of some of the stakeholders at this public debate will contribute to the achievement of the expected results and the development of this significant project for the city of Belgrade.

Also, please confirm your presence by e-mail: \_\_\_\_\_@beograd.gov.rs or by phone: 011 / \_\_\_\_\_ no later than Monday, December 17, 2018.

We are available for further information, contact person is \_\_\_\_\_ position, telephone: 011 / \_\_\_\_\_.

Signature

Who sends





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### Text of public invitations

Published in the Newspapers "Vecernje Novosti" - Date: 16.12.2018 - Page: 36

In Accordance with PPP Contract No \_\_\_\_\_

City of Belgrade – Secretariat for Environmental Protection invites to

#### PUBLIC CONSULTATIONS

any organization, body and the general public interested in the:

#### ENVIRONMENTAL AND SOCIAL IMPACT ASSESSMENT

(ESIA)

for the

#### VINČA ENERGY-FROM-WASTE FACILITY, CONSTRUCTION OF THE NEW LANDFILL AND REMEDIATION OF THE EXISTING LANDFILL

Interested parties can get an insight into the document (on Serbian and English ) on following address:

<https://www.ebrd.com/work-with-us/projects/esia/belgrade-solid-waste-ppp.html>

<https://disclosures.ifc.org/#/enterpriseSearchResultsHome/belgrade%20wte>

Remarks and suggestion in regard to the (ESIA) document shall be submitted in writing to Secretariat for Environmental Protection to the following internet address:

beoeko@beograd.gov.rs

On December 20th, 2018, at 17:00 public consultation and presentation of the subject ESIA document will be held at the premise of the Municipality of Grocka, Bulevar Oslobođenja 39 „Velika sala“.

If you need any additional information, please contact:

Stevislava Cvetojevic, s.cvetojevic@beograd.gov.rs

This invitation was published on <http://www.beograd.rs/en/gradski-oglas-i-konkursi-i-tenderi/1756004-public-consultation-for-environmental-and-social-impact-assessment-for-the-vinca-energy-from-waste-facility/>



### **B.1.5. Description of other Means and methods to provide feedback for those who are not able to join the consultation meeting**

The event has a well been published on the City website at the following address: <http://www.beograd.rs/en/gradski-oglasni-konkursi-i-tenderi/1756004-public-consultation-for-environmental-and-social-impact-assessment-for-the-vinca-energy-from-waste-facility/>.

To get further information, the stakeholders could therefore contact the municipal services since the Secretariat for Environment was clearly identified as the municipal service publishing this notice and providing on the same the direct contact of Mrs Cvetojevic (s.cvetojevic@beograd.gov.rs for further information).

## **SECTION C. REPORT OF THE CONSULTATION PROCESS**

### **C.1. Date of Meeting**

#### **C.1.1. List of participants**

The complete List of participants is provided to the VVB in the Minutes of Consultation, in the confidential Annex A.

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Date and Time 20/12/2018 – 17h Location Municipality of Grocka, Bulevar Oslobodjenja 39

Category Code	Name of participant, job / position in the community	Male / Female	Contact details	Organization (if relevant)	Signature
A	Vesna	F			
A	Verica	F			
A	Marijana	F			
A	Sladjan	M			
A	Milan Pavlovic	M			
A	Dejan	M			
A	Dragana	M			
A	Gordana	F			
A	Dusko	M		City Munic. Grocka	
A	Dusan	M			
A	Sasa	F		City Munic. Grocka	
A	Marina	F		City Munic. Grocka	
A	Aleksandar	M		City Munic. Grocka	
A	Boban	M		City Munic. Grocka	
A	Goran	M		City Munic. Grocka	
A	Anica	F		City Munic. Grocka	
A	Ivana	F		City Munic. Grocka	
A	Dejan	M		City Munic. Grocka	
A	Mira	M		City Munic. Grocka	
A	Zeljko	M		City Munic. Grocka	

A	Zoran	M		Lestane	
A	Marko	M		Lestane	
A	Branka	M		Lestane	
A	Radoljub	M		Lestane	
A	Slobodan	M		Lestane	
A	Boban	M		Kaluđerica	
A	Anica	F			
A	Ljubisa	F			
A	Ivana	F			
A	Sasa	M			
A	Marina	F			
A	Aleksandar	M			
A	Mira	F			
A	Ljubisa	F			
A	Dejan	M			
A	Andrea	M			
A	Vojkan	M			
A	Roncevic	M			
A	Nikola	M			
A	Boban	M			
E	Aleksandar	M		ARUP d.o.o.	
A	Aleksandra	M			
B	Milos	M		PUC Water supply and canalization Grocka	
B	Danijela	F		City Munic. Grocka	
B	Tamara	F		City Munic. Grocka	
B	Mirjana	F		City Munic. Grocka	
B	Boris	M		City Munic. Grocka	
B	Igor	M		PUC Water supply and canalization Grocka	

A	Staleta	M		unemployed	
B	Srecko	M			
B	Negomir	M		PUC Water supply and canalization Grocka	
N/A	Bojana	M		Dvoper	
N/A	Pavle	M			
N/A	Natasa	F			
N/A	Tanja	F			
N/A	Nebojsa	M			
B	Tatjana	F			
B	Stevislava	M			
B	Dragan	M			
B	Milos	M		Social protection secretary	
A	Nemanja	F			
A	Dragan	M		Kaluđerica	
A	Radoje	M		Kaluđerica	
D	Mila Trajkovic	M		Eko Grocka d.o.o.	
A	Nikola	M		City Munic. Grocka	
A	Mirko	M		Vinča	
A	Zoran	M		Vinča	
A	Nenad	M		Vrčin	
A	Jelena	F		Vinča	
A	Nadica	F			
A	Jovanka	F			
A	Rade	M			
A	Srecko	M			
A	Zoran	M			
A	Vlado	M			
A	Milos	M			

A	Stevo	M		City Munic. Grocka	
B	Miroslav	M		PUC Water supply and canalization Grocka	
B	Zeljko	M		City Munic. Grocka	
B	Ruža	M		JP za razvoj go Grocka	
A	Milenko	M			
A	Milos	M			
A	Jelena	F		Dvokut-ecro d.o.o.	
B	Milena	F		PU „Lane“ Grocka	
A	Sladjana	F			
A	Dragana	F		City Munic. Grocka	
B	Aleksandra	F		Centar za kulturu Grocka	
A	Zorica	F			
B	Ema	F		City Munic. Grocka	
B	Milica	F		City Munic. Grocka	
D	Jelena	F		Eko Grocka	
D	Ivan	M		Eko Grocka	
B	Tatjana	F		City Munic. Grocka	

*\*Because of potential legal implications the names, gender and phone numbers had to be anonymized (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019)*

*For information for the 20/12/2018 consultation : 41% of participants were female.*

*The original participants list (confidential) has been provided to the VVB as an Annex A of the present Stakeholder Consultation Report.*

Date and Time 21/12/2018 – 17h Location Municipality of Grocka, Bulevar Oslobodjenja 39

Category Code	Name of participant, job / position in the community	Male / Female	Contact details	Organisation (if relevant)	Signature
N/A	Bojana	F		Dvoper d.o.o.	
N/A	Pavle	M		Dvoper d.o.o.	
D	Ivana	F		Zvezda 2000	
D	Todor	M		Zvezda 2000	
D	Vuk	M		Zvezda 2000	
D	Slobodan	M		Zvezda 2000	
D	Aleksandar	F		Zvezda 2000	
D	Mihajlo	M		Zvezda 2000	
D	Katarina	F		Ecological discipline	
D	Nebojsa	M		ELSA	
D	Tijana	F		Home Fitness	
D	Ana	F		Ecological discipline	
D	Filip	M		Zemun youth	
B	Tatjana	F		Secretary for Environment	
B	Cvetislava	F		Secretary for Environment	
N/A	Natasa	F		Dvoper	
N/A	Jelena	F		Dvokut-ecro d.o.o.	
N/A	Tanja	F		Dvoper d.o.o.	
D	Ana	F		Healthy and equitable society	
D	Milan	M		Group for European project	
E	Aleksandar	M		Arup d.o.o.	

*\*Because of potential legal implications the names, gender and phone numbers had to be anonymized (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019)*

*For information for the 21/12/2018 consultation : 52% of participants were female.*

The original participants list (confidential) has been provided to the VVB as an Annex A of the present Stakeholder Consultation Report.

#### C.1.2. Pictures from physical meeting(s) (best practice)

*Because of potential legal implications the photos could not be published in the public version of the SCR (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019 ).*

The pictures have been provided as a confidential Annex E to the VVB.

#### **C.2. Minutes of physical meeting(s)**

*Because of juridical implications the photos could not be published in the public version of the SCR (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019 ).*

The Minutes of meetings of the consultations are provided to the VVB in a confidential Annex A.

On December 21, 2018 in City Administration's Big Hall premises, Public Consultation for environmental and social impact assessment (ESIA) for the Vinča energy from- waste facility for interested Non-Governmental Organizations (NGO), was conducted.

For the Investors, as representatives, the speakers were:

- Malik Kerkar on behalf of the company BEO ČISTA ENERGIJA D.O.O. BEOGRAD
- Igor Anić on behalf of the company Dvokut Ecro Ltd and
- Nebojša Pokimica on behalf of the company Dvoper Ltd,

While the City of Belgrade was represented by:

- Miloš Mihajlović - Secretariat for Social welfare
- Jasna Mavrić – Belgrade Land Development Public Agency
- Gordana Šćepanović, Secretariat for Environmental Protection

After the presentation was concluded, Mr Kerkar informed the NGO representatives that all comments or enquiries relating to Project activities can be directed to the City Secretariat for Environmental Protection and to the BEO ČISTA ENERGIJA D.O.O. BEOGRAD

There were no questions posed to the presented topic after Mr. Kerkar opened the discussion. Mr Kerkar reached out once again to the present representatives of the NGOs inviting them to ask their questions and express their opinions.

Since it was established that there are no questions relating the subject presentation currently, Ms Gordana Šćepanović said that she hoped there will be further cooperation with the NGOs and mentioned that if any questions may arise later, they can be sent online and the answers to them will be provided as soon as possible

As information, the Minutes of Meeting held on December 20, has been provided as a confidential Annex A to the VVB. The Minutes of Meeting includes the presentation given by the Project Developer.

### C.2.1. Minutes of other consultations

#### **1<sup>st</sup> EIA consultation held on the 23th July 2019**

*Because of potential legal implications the photos could not be published in the public version of the PDD (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019 ).*

The Minutes of meetings of the consultations are provided to the VVB in a confidential Annex A.

On 23 July 2019 at 10 a.m., the public hearing for both Studies on environmental impact assessment of the Project for construction and operation of the municipal waste and landfill gas utilization plant at the location Vinča and of the project New landfill with accompanying facilities at the location Vinča was conducted.

For the Investor, as representatives, the speakers were:

- Malik Kerkar on behalf of the company BCEBEO ČISTA ENERGIJA D.O.O. BEOGRAD,
- Ana Pavlovic on behalf of the company BCEBEO ČISTA ENERGIJA D.O.O. BEOGRAD who translated Malik Kerkar,
- Nebojša Pokimica on behalf of the company Dvoper Ltd.

The presentation of the Studies was started by Malik Kerkar, who gave a brief history in the implementation of projects, starting with the decision of the City of Belgrade to accept the mechanism of public-private partnership for better management of the municipal waste landfill Vinča. He presented a chronology of procedures in accordance with national legislation based on which conditions and consents were obtained and on the basis of the latest Detailed Regulation Plan for the Vinca landfill, as well as the procedure that had to be carried out in accordance with bank requirements (ESIA and accompanying documents).



In accordance with the adopted project solution, he presented the characteristics related to both projects - description of the location (distance from the nearest residential buildings, infrastructure facilities, distance from the Danube River), type of waste to be delivered to the location, quantities, projected plant capacities and new landfills, a brief description of technological procedures, with an overview of the planned types of pre-treatment and treatment of all waste streams and more.

The presentation of the study was continued by Nebojsa Pokimica, who presented the measures envisaged in order to prevent, reduce and eliminate the harmful impact on the environment and the monitoring program for the impact on the environment.

After the presentation of the study, there was a ten-minute break, and the discussion was continued by answering the questions asked by those present.

The questions and answers asked by those present at the public hearing are given in the section Assessment of comments from all consultations above. Public hearing ended at 13.30 h.

## **2nd EIA consultation held on the 7th October 2020**

*Because of potential legal implications the photos could not be published in the public version of the PDD (see Serbian Personal Data Protection Law, which is modelled under GDPR and applicable in Serbia as of 21 August 2019 ).*

The Minutes of meetings of the consultations are provided to the VVB in a confidential Annex A.

On 7 October 2020 at 10 a.m., the public hearing for Updated Study on environmental impact assessment of the project New landfill with accompanying facilities at the location Vinča was conducted.

For the Investor, as representatives, the speakers were:

- Tanja Radovic on behalf of the company Dvoper Ltd and
- Nikola Jovanovic on behalf of the company Suez.

The updated subject study was presented by Tanja Radović. She explained that in accordance with Article 28 of the Law on Environmental Impact Assessment, the procedure of updating the Study on Environmental Impact Assessment of the project for construction of a plant for energy utilization of municipal waste and landfill gas "Vinca" is being carried out ; the new BREF document has entered into force which led to mandatory adaptations of the project. The changes were mostly related to stricter limit values for air emissions.

She described the project, focusing on modified parts to meet the requirements of the new BREF document. It presented the state of environmental factors (air quality, surface and groundwater,

leachate, soil and sediments, noise level), environmental impacts that can be expected during the construction of the plant and its operation, as well as measures that will be taken to reduce these impacts.

The public hearing ended at 13 o'clock.

### C.3. Assessment of comments from all consultations above

Gender of Stakeholder	Stakeholder comment	Was comment taken into account (Yes/ No)?	Explanation (Why? How?)
Male	Is the animal waste treatment envisaged by the Project ?	yes	Explanations were provided on the type of waste that are prohibited to be processed on the planned facilities
Male	Will the waste on the existing landfill be treated in EfW plant?	yes	Explanations were provided regarding the exact scope the project. Waste on the existing landfill will not be treated in the Energy from waste. However, leachates which are the main source of pollution of the already dumped wastes will be treated in a new leachate treatment plant
Female	Was the relocation of the landfill considered since the existing landfill is located in a nature reserve and in the immediate vicinity of the archaeological site of Vinča ?	yes	Clarifications were provided on the mitigation measures foreseen to prevent impact on the nearby natural reserve and archeological sites. Technical/Economical consideration were present to explain why the relocation of the landfill was not feasible.
Female	When the EfW plant and new landfill will start working and	yes	Detailed information on planned changes in waste collection tax was not yet

how they will affect  
the waste collection  
tax (resident of the  
settlement of  
Leštane)?

available at the time of the Public  
Consultation

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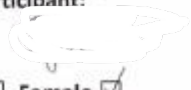



**TEMPLATE**

C.3.1. Evaluation forms (best practice)

The evaluation forms in pdf -format have been provided as Annex F to the VVB.


Vinca Landfill Project – ESIA Study public consultation	
EVALUATION FORM	
Name of the Participant: <i>Aleksandar [Signature]</i>	Date: 20/21.12.2018
Gender: Male <input checked="" type="checkbox"/> Female <input type="checkbox"/>	
What is your impression of the meeting?	Response: <i>It was well organized. The presentations were informative and provided comprehensive information about the Project.</i>
What do you like about the project?	Response: <i>The Project represents the first large scale env. APP project. The existing dumpsite will be closed and re-vegetated. It is 40 years old and one of the largest uncontrolled dumpsite in Europe.</i>
What do you not like about the project?	Response: <i>This is high-profile Project for Serbia and attracts unneeded political attention as such</i>
Signature:	<i>[Signature]</i>

Vinca Landfill Project – ESIA Study public consultation	
EVALUATION FORM	
<b>Name of the Participant:</b> <i>Dragana</i>  <b>Gender:</b> Male <input type="checkbox"/> Female <input checked="" type="checkbox"/>	<b>Date:</b> 20/21.12.2018
<b>What is your impression of the meeting?</b>	<b>Response:</b> <i>A meaningful and well prepared meeting</i>
<b>What do you like about the project?</b>	<b>Response:</b> <i>Concern for the protection of the environment.</i>
<b>What do you not like about the project?</b>	<b>Response:</b> <i>Many professional terms that still need to be adapted in order to be properly understood by general population.</i>
<b>Signature:</b>	


EVALUATION FORM	
<b>Name of the Participant:</b> Tatjana [Signature] Gender: Male <input type="checkbox"/> Female <input checked="" type="checkbox"/>	<b>Date:</b> 20/21.12.2018
<b>What is your impression of the meeting?</b>	Response: The presentation of the Project was appropriate and clear. Those present at the public hearing, where a significant number of citizens were present, were able to see the essence and advantages of the future way of collecting, disposing and processing municipal waste, as well as rehabilitating the existing and building a new sanitary landfill. The effect of reducing and mitigating air, soil and environmental pollution is especially emphasized.
<b>What do you like about the project?</b>	Response: The project is extremely important for the city of Belgrade, because it finally regulates the law-based way of waste management on the territory of the City. This includes, in addition to waste treatment at the Vinca landfill, with all elements of project implementation and the City's obligation to implement a system of primary waste selection, recycling and reuse, which completes proper waste management in Belgrade.
<b>What do you not like about the project?</b>	Response: There are no negative impressions about the project thus far.
<b>Signature:</b>	[Signature]

Vinca Landfill Project – ESIA Study public consultation

EVALUATION FORM

<p>Name of the Participant:                  Mrs. RUIZ                  Gender: Male <input type="checkbox"/> Female <input checked="" type="checkbox"/></p>	<p>Date:                  20/pt. 12. 2018.</p>
<p>What is your impression of the meeting?</p>	<p>Response:                  THE WHOLE PROCEFS IS UNDERSTANDADDDY EXPLAINED.</p>
<p>What do you like about the project?</p>	<p>Response:                  USE OF GARDAGE AS A RENEWABLE ENERGY SOURCE. IT IS CONTRIBUTION TO THE ENVIRONMENT AND ECOHOMY. IT IS GREEN PROJECT.</p>
<p>What do you not like about the project?</p>	<p>Response:                  —</p>
<p>Signature:</p>	

Vinca Landfill Project – ESIA Study public consultation

EVALUATION FORM	
Name of the Participant: <i>Zorica</i>	Date: 20/21.12.2018
Gender: Male <input type="checkbox"/> Female <input checked="" type="checkbox"/>	
What is your impression of the meeting?	Response: <i>The project has been explained in detail.</i>
What do you like about the project?	Response: <i>The project intends to solve the problem of the existing landfill.</i>
What do you not like about the project?	Response: <i>Location by the river Doube and Archeological site in Vinča.</i>
Signature:	



Vinca Landfill Project – ESIA Study public consultation	
EVALUATION FORM	
Name of the Participant: Milos [Signature]	Date: 20/21.12.2018
Gender: Male <input checked="" type="checkbox"/> Female <input type="checkbox"/>	
What is your impression of the meeting?	Response: The Project has been explained in detail.
What do you like about the project?	Response: The long-standing problem of waste disposal in the city of Belgrade will be solved
What do you not like about the project?	Response: There is nothing I didn't like about the project.
Signature:	Milos [Signature]

#### C.4. Summary of alterations based on comments

##### ESIA Consultation (Meetings held on 20-21/12/2018)

Numerous comments on the ESIA report prepared jointly by several NGOs namely Bankwatch, A11 and Ne Davimo Beograd. Most of the comments were seeking clarification on the environmental and social baseline data and compliance of the project with the applicable local Serbian regulation / EU regulation or International Standards. Consequently, those comments did not result in any immediate design modification.

Nonetheless, they were carefully assessed by the Project Developer, the City of Belgrade, the Lenders and "Independent Environmental Consultant" (ARUP) appointed by the Lenders, with the following consequences:

- The “Independent Environmental Consultant” screened all comments and evaluated those to be addressed directly and incorporated into the revised ESIA report in order to complete the ESIA Public Disclosure Process. The revised report was published on the EBRD website and in parallel, all comments / questions raised were directly answered to the concerned NGOs.
- The comments received raised a concern among the NGOs that the Energy from Waste component of the project might not comply with the new EU Waste Incineration BREF standards ; under review at the time of the consultation and finally approved on the 17th of June 2019.

Therefore, the Lenders further clarified the requirements set in Schedule 9 – Environmental & Social Action Plan of the Credit Terms Agreement- and set specific requirements in line with the EBRD guidelines and in anticipation of the forthcoming change in regulation at EU level:

See below Extract of ESAP Action 3.6:

- “ • Review the requirements of the latest EU BREF document for waste incineration once it is finalized (final draft as of December 2018). Develop and implement a plan to ensure the project will operate in compliance with the revised BREF.
- Plan to be developed within six months of the adoption of the revised BREF and implemented by the end of 2022.”

In the meantime, the design of the Energy from Waste facility has been amended to be fully aligned with the newly adopted EU Waste Incineration BREF standards. This change in design is the subject of an on-going new EIA procedure.

## SECTION D. CONTINUOUS INPUT / GRIEVANCE MECHANISM

	<b>Method Chosen (include all known details e.g. location of book, phone, number, identity of mediator)</b>	<b>Justification of Choice (best practice)</b>
Continuous Input / Grievance Expression Process Book (mandatory)	Bulletin boards on the plant sites Grievance Register managed by the Grievance Officer	Employees of the site and contractors working on the project will have access to the information.
GS Contact (mandatory)	<a href="mailto:help@goldstandard.org">help@goldstandard.org</a>	The Consultation has been conducted before the engagement of the PD in the Gold Standard Certification Process. The PD did not know this specific requirement.

## TEMPLATE- T-PreReview\_V1.1-Stakeholder-Consultation-Report

Telephone access (optional)	Community liaison officer, assigned by BCE Mr. Željko Rebersak, the Site Manager (Phone: +381 63 556 148 ; Email: zeljko.rebersak@suez.com)	For the older population, which does not use the digital tools, telephone access had to be proposed
Internet/email access (optional)	BCE's website - <a href="https://www.bcenergy.rs/links.html">https://www.bcenergy.rs/links.html</a>	The BCE website is the best option to reach out to the largest population. In Belgrade a large part of the inhabitants has digital access
Nominated Independent Mediator (optional)	City Secretariat for Environmental Protection Contact Person: Tatjana Živković Address: Belgrade, 43-45, 27. Marta Street Telephone number: +381 11 330 9611 Email address: tatjana.zivkovic@beograd.gov.rs	Public institution and local municipalities (which were grievance contacts as well) are local contact points for the population, and easier reachable.
Other		
Other	BCEBEO ČISTA ENERGIJA D.O.O. BEOGRAD. Contact Person: Gordana Jelenić, Managing Director Assistant Address: Tošin bunar 272v, 11070 Belgrade, Serbia Telephone number: +381 11 715 4885 Email address: bce@bcenergy.rs	

## TEMPLATE

### GRIEVANCE PROCEDURE

- **STEP 1: Grievance Forms and Information Disclosure regarding GRM.**

The Grievance mechanism is applied to the Project in the following ways :

- Mechanisms are included in the Construction Environmental and Social Management Plan (CESMP) as well as the Environmental and Social Management Plan ESMP of BEO ČISTA ENERGIJA D.O.O. BEOGRAD. Both documents tables of content are provided in Annexes G and H to the VVB. The full documents can be provided upon request.
- All EPC Contractors have adopted the grievance mechanism, which are described in their CESMPs consistent with the ESMP, with a dedicated person for accepting and handling grievances for each of the EPC contractors
- A grievance form is available on BCE's website - <https://www.bcenergy.rs/links.html>
- Posters including the necessary information regarding grievances are located on all the individual construction sites, on bulletin boards.



- By hand or verbal grievance are also accepted ; A Technical Manager or any other personnel will inform the Grievance Officer of the project immediately in this case.

Concerning the grievance mechanisms presented in the CESMP as well as the BCE ESMP :

- Grievance Forms together with information on how to relay grievances (e.g. flyers, posters etc.) are distributed by the EPC Contractors at different sites (municipality, etc..)
- In addition, the grievances may also be received through direct phone call, mail or email to the EPC Contractor.
- The City Secretariat for Environmental Protection, BCE and the contractor will accept and respond to all suggestions and complaints associated with the Project.

Any person or organization may send comments, complaints and/or requests for information in person or via post, telephone or email using the contact information provided below.

- At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Serbia.
- Furthermore, the City of Belgrade manages communication with citizens in relation to all city communal services through the Belgrade Communal Service (BEOKOM). All questions and complaints in relation to the Project received by BEOKOM will be forwarded to the City Secretariat for Environmental Protection, for recording and addressing as part of this grievance mechanism.

All grievances will be registered and responded to within 30 calendar days, either verbally or in writing, in accordance with the preferred method of communication specified by the complainant. Individuals who submit their comments or grievances have the right to request that their name be kept confidential. Grievances can also be submitted anonymously, however this may limit the possibilities for investigation of complaints and providing a response.

- During Construction and Operation, a community liaison officer, assigned by BCE, will handle all grievances received by the community during the lifetime of the project. Mr. Željko Reberšak, the Site Manager in front of SVO has been appointed to this position. (Phone: +381 63 556 148 ; Email: [zeljko.rebersak@suez.com](mailto:zeljko.rebersak@suez.com)) BCE will respond to either verbally or in writing in accordance with the preferred method of communication specified by the complainant, if contact detail of him/her are provided. Individuals who submit their comments or grievances have the right to request that their name be kept confidential. At all times, complainants are also able to seek legal remedies in accordance with the laws and regulation.

- **STEP 2: Receiving Grievances**

A Grievance Officer is designed by the Engineering, procurement, and construction Contractor. The Grievances will be followed by the Grievance Officer from through following actions:

- Representatives of the offices listed in the table will be contacted once a week and inquired if any grievances are received.
- Technical Manager or any other personnel will inform the Grievance Officer immediately in case of a grievance submitted by hand or a verbal grievance.
- Grievance Officers or equivalent personnel of Sub-Contractors will contact the Grievance Officer immediately after receiving grievances.

- **STEP 3: Grievance Logging**

All received grievances will be immediately recorded by the Grievance Officer in a Grievance Register (Book).

- **STEP 4: Informing Upper-Management**

The Grievance Officer will immediately inform BCE regarding any grievance. In case of a grievance regarding land acquisition, City of Belgrade Grievance Contact Person will be informed immediately, together with the relevant grievance form and/or details on the received grievance.

- **STEP 5: Response**

In consultation with the BCE Team, the Grievance Officer will decide if the received grievance requires development and implementation of relevant actions.

The grievance holder(s) will be provided with an official written response by the Grievance Officer regarding the developed/implemented actions and how these actions will address the grievance or an adequately detailed reason why the grievance requires no actions.

In addition, whenever a grievance cannot be resolved in the given time periods, a detailed, justified reason for the extension will be officially communicated to the grievance holder(s).

The responses will be given in 14 days for Labor and Environmental Issues and 30 days for other questions or comments.

- **STEP 6: Record Keeping and Reporting**

Each time actions are implemented, grievance holders are informed, and grievances are resolved, the Grievance Officer will update the Grievance Register.

Grievance holders will be consulted if they are satisfied with the proposed solution and if they are, a grievance can be closed out.

The Grievance Officer will also provide a list of all grievances together with short summaries of the grievances and the actions taken in the monthly Reports to be prepared to :

- record consultations undertaken, issues raised, actions taken;
- describe lessons learned and any changes to the disclosure and consultation process; and
- outline the schedule for on-going and future interaction with stakeholders.

Before and during construction the City Secretariat for Environmental Protection and BCE will produce Annual Environmental and Social (AESR) reports, which will also include a summary of the Project’s performance on grievance management (number, type and source of complaints; number of resolved complaints and average time for resolution of complaints, gender segregated). These reports will be submitted to the City of Belgrade Mayor’s cabinet and relevant other City of Belgrade departments, will be posted on the websites of the City of Belgrade and BCE.

**STEP 7 : Monitoring**

Finally, the Grievance Officer will conduct monthly follow-up of grievances received, actions implemented, and responses provided to ensure all grievances are closed to the satisfaction of the grievance holder. In case of any non-compliances, the EPC Grievance Officer will immediately develop further actions, in consultation with relevant ESHS Team members.

**SECTION E. STAKEHOLDER FEEDBACK ROUND**

Please check this box if the project is retroactive and has done only 1 consultation with a physical meeting integrated into the SFR.

**E.1. Length of the Feedback Round**

**ESIA Consultation Process (Consultation meetings held on 20-21.12.2018)**

Stakeholder Feedback Round		Planned	Actual
Start Date	12/10/2018	<input type="checkbox"/>	<input checked="" type="checkbox"/>
End Date	18/09/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>

EBRD published the ESIA study and related documentations on 12.10.2018 followed IFC. The electronic publication of the ESIA documentations on EBRD website officially opened the Public Consultation Feedback round. Please refer to the following links:

- <https://www.ebrd.com/work-with-us/projects/esia/belgrade-solid-waste-ppp.html>
- <https://disclosures.ifc.org/#/enterpriseSearchResultsHome/belgrade%20wte>

The ESIA comment period was left open until the project was approved by EBRD’s Board for therefore a period of nearly 11 months.

**E.2. Summarise how all stakeholders were/will be invited to provide feedback**

**ESIA Consultation Process (Consultation meetings held on 20-21/12/2018)**

The ESIA Public consultation was widely opened to all interested parties and the invitation published in the media gave clear indications on:

- Where the ESIA documentations could be consulted namely the EBRD and IFC website pages dedicated to the Vinca Project ;
- How remarks and suggestions on the project could be made directly to City of Belgrade: „Remarks and suggestion in regard to the (ESIA) document shall be submitted in writing to Secretariat for Environmental Protection to the following internet address: beoeko@beograd.gov.rs“.

During the Public Consultation meeting itself, the last slides of the presentation focused on the City of Belgrade objectives and features of the City of Belgrade Stakeholder Engagement Plan in regard to the Vinca project. When this slide was presented, special attention was taken to remind attendees that comments or enquiries relating to Project activities should be directed to:

City Secretariat for Environmental Protection	BEO ČISTA ENERGIJA D.O.O. BEOGRAD
Contact Person: Tatjana Živković Address: Belgrade, 43-45, 27. Marta Street Telephone number: +381 11 330 9611 Email address: <a href="mailto:tatjana.zivkovic@beograd.gov.rs">tatjana.zivkovic@beograd.gov.rs</a>	Managing Director Assistant Address: Tosin bunar 272v, 11070 Belgrade, Serbia Telephone number: +381 11 715 4885 Email address: <a href="mailto:bce@bcenergy.rs">bce@bcenergy.rs</a>

Therefore, allowing interested parties to make comments by phone or by e-mail either directly with the City of Belgrade or with the Project Developer.

Finally, the dedicated EBRD webpage was providing details on the ESIA and Resettlement Action Plan and the full availability at physical location with the Project Developer in its New Belgrade main office and with the Secretariat for communal and housing affairs located in Belgrade City centre.

The EBRD webpage was also providing full contact details, phone and e-mail, to address environmental or social enquiries directly to the Project Developer.

Nearly 150 written comments / questions from several NGOs extremely detailed were received by the EBRD. All the questions were addressed jointly by the Project developer and the City of



Belgrade and the EBRD shared those answers/clarifications directly with the NGOs while in parallel a revised ESIA public consultation was made available again on their website on 10.09.2019.

### **E.3. Summarise Feedback received, including if any changes in project design were made**

The ESIA report is a very detailed document (more than 900 pages long ) covering a significant number of facilities, technologies, applicable regulations and environmental / social impacts. The number of comments received was therefore quite high with an extremely wide range in the level of details entered and the magnitude of the project social/environmental impacts in relation to those comments.

Most comments were seeking clarification on the environmental and social baseline data and compliance of the project with the applicable local Serbian regulation / EU regulation or International Standards.

More specifically several NGOs (Ne Davimo Beograd / A11 / Bankwatch) sent jointly to the EBRD an extensive list of questions with comments specifically focusing on the Energy from Waste Facility environmental impacts including in particular:

- Request for clarification on where the solidified filter residues and fly ash would be disposed of;
- Clarification from the Project Developer on its commitments to monitor emissions to air apart from SO<sub>2</sub>, NO<sub>x</sub> and dust. The NGOs making the comment that all the substances limited by the draft Best Available Techniques reference document (BREF) for waste incineration 2017 ;
- Concern expressed on the fact that "Serbia does not have, as far as we are aware, any laboratory that can analyze dioxin and furan emissions"

Comment that the emissions to air do not appear to be in line with the 2017 draft BREF. The NGOs making the comment that "There is no point in building a facility which is already outdated at the time it is designed. Expected mercury emissions to air seem to be missing altogether

**TEMPLATE**

Stakeholder comment	Was comment taken into account ?	Explanation (Why? How?)
<p>Clarification on the commitments to monitor emissions to air apart from SO<sub>2</sub>, NO<sub>x</sub> and dust. The NGOs making the comment that all the substances limited by the draft Best Available Techniques reference document (BREF) for waste incineration 2017</p>	<p>Yes</p>	<p>Regarding the EfW It was always foreseen in the project that the BREF recommendation will be followed as far as monitoring of air emissions are concerned.</p> <p>Regarding the Landfill Gas Facility More stringent requirements were adopted as prescribed under the Decree of the Republic of Serbia, the "Regulation on Limit Values of Air Pollutant from Combustion Plants" The RS Official Gazette "No. 5/2016".</p> <p>LFG facility design was then amended to include a SCR DeNO<sub>x</sub> Flue Gas Treatment at the exhaust of the Engines combined with continuous measurement of NO<sub>x</sub></p>

		concentrations for control of urea injection system
Concern expressed on the fact that "Serbia does not have, as far as we are aware, any laboratory that can analyze dioxin and furan emissions"	Yes	<p>Monitoring of the dioxins and furans will be implemented frequently as requested and on the standard procedure of sampling and analyses as set by the relevant EU and Serbian regulations. At the moment, there are laboratories in Serbia that are accredited for sampling but not for determination of these compounds' concentrations into the gases. In line with regular practice here and in EU (representatives of cement industry in Serbia that use waste as alternative fuel also perform this practice), samples could be taken here and then send to some accredited laboratory abroad that will perform analyses and give official report.</p> <p>Nonetheless, the Project developer is actively seeking a local laboratory willing to be certified for analyzing Dioxin and Furans.</p>

<p>Clarification asked on the treatment of the actual waste (present on the existing land) by the EfW facilities</p>	<p>Yes</p>	<p>In response, it has been explained that the scope of the Project is the rehabilitation of the existing landfill which goal is to prevent future impact on the environment (stabilization by a dam, covering with impermeable layers, Leachate Treatment Plant (LTP), degasification system for methane collection), but waste from old landfill will not be used in the EfW plant.</p>
<p>Was the relocation of the landfill considered since the existing landfill is located in a nature reserve and in the immediate vicinity of the archaeological site of Vinča (Zorica Antić, the Center for Culture Grocka) ?</p>	<p>No</p>	<p>Waste relocation has not been considered because it is financially too onerous and would had much more significant impacts on the environment. At the moment, more than 10 million m3 of waste is located at the landfill, which the full displacement to another location would be extremely difficult and hazardous. The Vinča location is suitable for landfill construction because of its geological features, that is, a large amount of clay that prevents leachate penetration into the deeper layers. This is also one of the reasons why this site was selected 40 years ago.</p>

	Yes	As a part of Baseline study a geophysical examination was carried out in the Vinčalandfill zone in order to determinate possible presence of archaeological objects and materials. If, despite the baseline investigations, archaeological materials are discovered during the works anywhere within the planned project area, all works will be immediately suspend, in accordance with Serbian regulations. Also, the Investor will ensure an archaeological expert who will supervise all works on the project site
How the start of the EfW facilities will affect their amounts, especially for the residents of the settlement of Leštane) ?	No	The representative of the City of Belgrade said that currently there is no precise information about the change of waste collection tax Please note this question even though legitimate goes beyond the scope of responsibility of the Project Developer and is the sole responsibility of the City Assembly of Belgrade



**TEMPLATE**

**Revision History**

<b>Version</b>	<b>Date</b>	<b>Remarks</b>
1.1	x October 2020	<p>Inclusion of Key Project Information</p> <p>Restructure, new headings and reorder to better match the steps a developer will follow in consultations.</p> <p>Removal of some non-mandatory template tables (Blind Sustainable Development Assessment). Clarification of best practice steps that are non mandatory processes, clarification of mandatory discussion points. Clarification regarding publishing names and that original evaluation forms (optional) and attendance lists (mandatory) should be separate documents.</p> <p>Improved clarity on Stakeholder Feedback round section and procedures for retroactive projects</p> <p>Provision of an <a href="#">accompanying Guide</a> to help the user understand detailed rules and requirements</p>
1.0	14 August 2017	Initial adoption