(stamp)
Beo Čista Energija d.o.o.
Belgrade
No.: 152/2019
Date: 03.10.2019
Belgrade

Republic of Serbia
Ministry of Environmental Protection
No.: 353-02-1299/2019-03
Date: 30 September 2019
Belgrade

Pursuant to Article 5a of the Law on Ministries (Official Gazette of the RS, nos. 44/14, 14/15, 54/15 and 96/15 – other law, 62/2017), Articles 18 and 24 of the Law on Environmental Impact Assessment ("Official Gazette of the RS", nos. 135/04, 36/09), Article 136 (1) of the Law on General Administrative Proceedings ("Official Gazette of the RS", no. 18/16), and Article 23 (2) of the Law on Public Administration ("Official Gazette of the RS", nos. 79/05, 101/07 and 95/10 and 99/14), at the request of the project developer, "Beo Čista Energija" d.o.o., Belgrade, the Ministry of Environmental Protection hereby issues the following

D E C I S I O N

1. Approval is hereby granted for the Environmental Impact Assessment Study for the project of new landfill with accompanying facilities at the Vinča site in Belgrade, Municipality of Grocka, City of Belgrade, on the cadastral plots defined in the Location Requirements issued by the Ministry of Construction, Transport and Infrastructure, number: 350-02 -00104/2019-04 dated 12 April 2019.

2. The project developer is obliged to implement the environmental measures specified in the Impact Assessment Study referred to in point 1 of this Decision (Chapter 8 of the relevant Study).

3. The project developer is obliged to comply with other requirements and approvals issued by the competent authorities and organizations in accordance with separate law.

4. The project developer is obliged to implement an environmental monitoring program – monitoring system (Chapter 9 of the relevant Study).

5. The project developer is obliged to commence the implementation of the project within two years from the date of receipt of this Approval Decision. The Decision and the Study shall be an integral part of the technical documentation required for obtaining the permit or approval for commencing the project.

6. The costs of proceedings shall be specified in a separate Decision.

R E A S O N I N G

The project developer, “Beo Čista Energija” d.o.o. Belgrade, on 20 June 2019, filed to the Ministry of Environmental Protection an application for approval of the Environmental Impact Assessment Study for the project of new landfill with accompanying facilities at the Vinča site in Belgrade, Municipality of Grocka, City of Belgrade on the cadastral plots defined in the Location Requirements issued by the Ministry of Construction, Transport and Infrastructure, number: 350-02-00104/2019-04 dated 12 April 2019, undertaken by company “Dvoper” d.o.o., Belgrade.

The Environmental Impact Assessment Study was undertaken entirely in compliance with the Decision on scoping of the Environmental Impact Assessment Study of the project of new landfill with accompanying facilities at the Vinča site in Belgrade, Municipality of Grocka, City of Belgrade on cadastral plots nos. 919/3, 918/3, 917/1, 917/2, 916/1, 916/2, 2692/5, 5/3, 5/4, 6/1, 6/2, 7/4, 16/4, 16/5, 8/1, 8/2, 9/1 and 10/3, all located in Cadastral Municipality of Vinča, City of Belgrade – Municipality of Grocka (Area K2) and 424/1, 424/2, 497/1, 497/2, 499/1, 499/2, 494/1, 494/2, 494/3, 420/1, 420/2, 423/1, 423/2, 495/1, 495/2, 495/3, 495/4, 655/1, 655/4, 654/1, 654/2, 654/3, 420/5, 422/3, 422/4, 496/1, 496/2, 2676/1, 2668/2, 401/3, 401/4, 400/1, 400/3, 2666/6, 2666/7, 2668/7, 2668/8, 2676/5, 2676/6, 498/1, 498/2, 499/3, 654/4, 654/6, 654/7, 654/8, 655/5 and 655/6 all located in Cadastral Municipality of Vinča, City of Belgrade – Municipality of Grocka (Area K3), number 353-02-1686/2018-03 dated 29 August 2018.

Pursuant to Article 20 of the Law on Environmental Impact Assessment, public review (“*public consultation”)* was provided, a presentation was organized and a public debate was conducted with regard to the relevant Study – as advertised in the daily newspaper “Politika” on 28 June 2018 and at the official Ministry’s website http://www.ekologija.gov.rs/obavestenja/procena-uticaja-na-zivotnu-sredinu/. Public review was arranged at the premises of the Ministry of Environmental Protection and the Municipal Administration of the Municipality of Grocka. The public debate was held on 23 July 2019 at the Municipal Administration headquarters of the Municipality of Grocka.

The public debate, in addition to delegates from the Ministry of Environmental Protection and from the local self-government - the City of Belgrade and the Municipality of Grocka, representatives of the project developer and experts who undertook the Study, was also attended by members of the public concerned – representatives from the “Centre for Ecology and Sustainable Development” from Subotica, Citizens' Associations “Right to the City” (*Pravo na grad*) and “Let's Not Drown Belgrade” (*Ne da(vi)mo Beograd*), the Bird Protection and Study Society of Serbia, media representatives and other citizens.

Representatives from the Citizens' Associations “Right to the City”, “Let's Not Drown Belgrade”, and the “Centre for Ecology and Sustainable Development” from Subotica raised a number of objections regarding, in general, the implementation of this project and the construction project of the municipal waste/landfill gas-to-energy cogenerated plant “Vinča”, as the public debate on both Environmental Impact Assessment Studies took place at the same time. Potential air pollution by waste organochlorine gases such as dioxins and furans by the Energy-from-waste plant, the lack of expert capacity to monitor these substances and keep them within legally allowed limits, the use of diesel fuel and calculation of waste gas emissions, groundwater pollution, the amount of municipal waste required for the operation of the plant and its proportion to total waste generated annually in the City of Belgrade, the cost of the entire project, the manner and conditions of storage of waste ash and slag (bottom ash) in the new landfill, rehabilitation of the old municipal waste landfill and finally, the compliance of both projects with the IPPC Directive of the European Union and the national law implementing this Directive.

During the course of the public consultation, the following entities submitted comments/objections to the relevant Environmental Impact Assessment Study:

- Citizens’ Association “Right to the City” from Belgrade,

- Citizens' Association "Let's Not Drawn Belgrade",
- The Bird Protection and Study Society of Serbia,
- Ksenija Radovanović from Belgrade,
- Petar Denčić from Belgrade.

Pursuant to Articles 22, 23 and 24 of the Law on Environmental Impact Assessment, in the Decision No: 353-02-1299/2019-03 dated 3 July 2019, a Technical Committee was established with the task of reviewing the Environmental Impact Assessment Study, supporting documentation and opinions submitted by authorities, organizations and public concerned.

After the meeting held on 16 August 2019, the Technical Committee compiled the Evaluation Report for the relevant Study, stating that it was not undertaken entirely in accordance with the Law on Environmental Impact Assessment ("Official Gazette of the RS", nos. 135/04, 36/09) and the Rulebook on the Scoping of the Environmental Impact Assessment Study ("Official Gazette of the RS", no. 69/05). At the meeting it was concluded that the relevant Study shall be corrected and supplemented in accordance with the submitted opinions, i.e. comments/objections from the public concerned.

After submitted the supplemented and revised Study on 20 September 2019, the Technical Committee held its second working meeting on 27 September 2019. Before the meeting, members of the Technical Committee analyzed all parts of the Study which were amended in detail, as follows:

1. Deliver Location Requirements with the electronic seal.

Location Requirements are attached to the Study – Volume 2.

2. Participants in undertaking the Study did not confirm their participation in undertaking.

Statutory regulations require only the signature of the responsible person, as Article 17 of the Law on Environmental Impact Assessment reads: "The Impact Assessment Study shall also contain basic information on the persons involved in its preparation, and their qualifications, on the responsible person, the date of completion, the signature of the responsible person and the validation of the signature with the seal of the authorized organization which conducted the Study."

3. The number of cadastral plots listed in the Study and in the Location Requirements is not the same. Explain.

In accordance with the Location Requirements, the Study has been amended to comply with this comment.

4. The Requirements obtained in the process of drafting the Amendments to the Detailed Regulation Plan for the Vinča Landfill are attached to the Report. It is necessary to submit the Requirements obtained for the purposes of design and connection in the process of obtaining Location Requirements, in order to determine whether the designed solutions comply with the issued Requirements. Please attach Requirements so that the electronic signature of the responsible entity is visible.

Attached to the Study – BOOK 2 – contains all legal documents issued by holders of public powers obtained within the process of obtaining Location Requirements.

5. Deliver a positive decision of the Review Committee on acceptance of the Design.

Review Committee decisions, as required, were included in the answers to comments from the Technical Committee.

6. Create table of contents for the Annex and insert it at the beginning of Book 2.

Comment implemented.

7. In the description of the macro-location on page 4, the text is illustrated by Figure 1, showing the location of the project with the cardinal direction and the scale, and this is correct. Comment 1 is as follows: In Figure 1: instead of the bar scale showing 3 km, a 5 km bar scale should be present; instead of the yellow circle with a diameter of 1.5 km, a circle 5 km in radius, i.e. 10 km in diameter should be present, and Ošljanski creek marked as a blue line. This is because the Study in some places refers to a "barrier" (on pages 33, 223, 224) and in some places to a "buffer" zone (page 33). The same should apply to the description of the micro-location. For Figure 2 on page 5 and Figure 4 on page 19, cardinal directions and scale bars should be added, as well as for all other illustrations, similar to figures 75 and 76 and on page 229, in order to make the quality of the Study consistent. Perhaps satellite imagery would most accurately depict the micro-location of the project and its immediate surroundings, or better still, a drone photo and a computer generated 3D image of the micro-location. Attached to the expert opinion, there are examples of images which would improve the quality of the description of the macro-location and the micro-location.

Comment implemented.

8. Chapter 2.3 – Overview of pedological, geomorphological, geological, hydrogeological, seismological characteristics of the terrain. Each of these characteristics should be a separate point in this chapter, to facilitate following the issues presented. Within this chapter, tectonic terrain characteristics should also be added. Pedological characteristics should be documented using an appropriately scaled map. Geological characteristics should be shown in more detail. The geological structure of the micro-location, as well as the broader area should particularly be presented. Only lithologic levels where piezometers were drilled are described, and this is not representative of the geological structure of the terrain.

The relevant chapter in the revised Study provides all the characteristics of the site, in individual sub-chapters.

9. In Chapter 2.5 – Climate characteristics, on page 29, the presentation of the wind rose shown on Figure 11 is not relevant for the actual site. We know that there are five topo-climate zones in the administrative territory of Belgrade, with different annual precipitation, mean annual temperatures, mean minimum temperatures for January, fog characteristics and mean annual wind rose. The site of the Vinča landfill is located in topo-climatic Zone 5 (Map 18 in the Belgrade Eco Atlas, attached to the expert opinion). It can also be assumed that the prevailing air currents at the relevant micro-location of the Vinča landfill differ from the prevailing winds registered at the Vračar meteorological observatory.

In accordance with the comment, Chapter 2.5 – Climate characteristics has been revised.

10. The eastern slopes on the right bank of the Danube at the site direct ground air currents along the river valley and local currents are likely to occur (warmer air rises along the slopes of the landfill and colder air takes its place, which affects the local circulation air flow). It would be a good idea to perform an analysis, because of the potential relevance for assessing the environmental impact of the project. We know that when a fire broke out at the landfill in 2018 flue gases and odors reached as far as Belgrade suburbs of Karaburma and even Dedinje. This section of the Study should be revised in this regard. In connection with the above, it would also be helpful, in the section stipulating protection measures, to specify installation of a mini weather station at the site of the Vinča landfill.

In accordance with the comment, Chapter 2.5 – Climate characteristics, has been revised. Installation of a weather station is proposed in the next stages of project implementation, in accordance with the Private Public Partnership Agreement.

11. Page 36 of the Study, Chapter 2.10 – Data on existing facilities, no data is provided about the existing landfill.

The existing landfill body is not an economic, residential or infrastructure or superstructure facility.

12. Page 20, Geotechnical Requirements are given for the site of Retaining structure. Geotechnical and geomechanical characteristics of the terrain where the entire complex of the sanitary landfill with accompanying facilities will be located was not provided. It is

necessary to investigate the stability of the whole area (compressibility, soil consolidation, etc.), and not merely show the aggressiveness of groundwater on concrete and reinforced concrete as shown in the Study.

The Study has been supplemented with Chapter 3.1.1 - Calculation of slope stability for new, old and inert landfill under static and dynamic conditions, to comply with this comment.

13. With regard to the previous comment, the Water Requirements (point 4.3) state: “At the site of the complex, all necessary geomechanical and hydrogeological works shall be carried out, based on which results, the required technical solution shall be given for filling and foundations of proposed facilities.”

The answer to this comment is part of the answer for the previous comment, no. 12.

14. Groundwater aggressiveness on concrete and reinforced concrete is given based on measurements from March 2017. Measurements are required to be performed during the first half of 2019.

For the purpose of designing concrete structures, an analysis of groundwater aggressiveness from 2017 is sufficient. Prior to commencement of concrete works, an additional analysis will be carried out as part of the standard procedure for the design of concrete mixes.

15. As part of geotechnical investigations, it is necessary to show the incidence of potential landslides. Develop a “Landslide cadaster”, with registered active, fossil as well as potential landslides, to determine the impact of the project on the incidence of potential landslides and propose adequate protection measures.

The answer to this comment is part of the answer for the previous comment, no. 12.

16. Chapter 2.4 – Information about the water supply source. The location of all water supply sources supplying the population with water is not shown relative to the designed end boundary of the future sanitary landfill complex (water mains and individual wells or tapped springs). Also, please provide detailed information on their distance, risk, sanitary protection zones. In this regard, it is necessary to obtain a statement from the competent Public Utility Company showing the position of any construction of the proposed complex in relation to sanitary protection zones of groundwater sources supplying water to the population.

The Requirements issued by PUC “Belgrade Waterworks and Sewerage” clearly define the position of the Vinča landfill complex in relation to sanitary protection zones of Belgrade water sources.

17. The text is missing: “The main hydrological (hydrographic) characteristics of the terrain” - Determine the geological, hydrogeological and hydrographic properties of the site in accordance with legal regulations (Institute for Nature Protection, point 3).

Hydrological properties of the terrain are presented in Chapter 2.3.

18. In accordance with the previous statement, carry out a detailed hydrogeological survey to accurately locate groundwater, i.e. aquifers, elements of groundwater regime, etc. all with the aim of proposing adequate protection measures.

Hydrological properties of the terrain are presented in Chapter 2.3.

19. The Water Requirements (point 4.5) reads: “Conduct a Hydrological Study of Ošljanski creek in order to protect the complex from external and internal waters so that construction, rehabilitation and expansion of the landfill does not interfere with the waterways and to allow intake and discharge of all surface waters gravitating towards the landfill site, the flow of which will be intersected. Based on the established relevant runoff from the surrounding terrain and the complex itself, please dimension the perimeter drainage channels up to the point of discharge into the existing Ošljanski creek (boundary of the landfill complex).”

The Hydrological Study was developed within the scope of the investigation works and as part of technical and design documentation, and on the basis of this Study, the dimensions of drainage channels on the perimeter were determined.

20. The Water Requirements from the relevant Ministry have not been attached, and water requirements are only shown within other data, where at the end of point 4.2.2, it is stated that it is necessary to obtain the Water Requirements in keeping with the Law on Waters and the Rulebook on the content and form of application for issuing of water documents.

Attached to the Study – BOOK 2 – includes all legal documents issued by holders of public powers obtained within the process of obtaining Location Requirements.

21. Show the exact distance of the closest, free standing, residential and other structures in relation to the relevant facility. Distances between structures are not accurate. Page 36 states that the closest inhabited households are more than 1000 m away from the Vinča landfill complex (air line); and Chapter 5.1, page 177 reads: "The nearest inhabited households in some settlements are about 1700 m away". Please graphically show the accurate distances of the structures closest to the future sanitary landfill complex.

The distances indicated are not in conflict.

22. There is no description of the flora and fauna in Chapter 2.6, i.e., there is no analysis about the project site itself. Please amend!

The text of the Study has been supplemented by data collected in the meantime at the site, in Chapters 2.6 and 5.5.

Chapter 2.5 – Climate characteristics with meteorological data.

Chapter 2.5 – Climate characteristics with meteorological data has been amended to comply with comment no. 9.

23. The diagram on page 27 (Fig. 10) is not clear. It shows mean monthly temperatures by month (cumulative for 2000-2015). It is necessary to show average temperatures by month for each year separately, as it is only possible to monitor the temperature change for the shown time period if this is provided.

Chapter 2.5 has been amended to comply with comment no. 9.

24. It is also necessary to provide data on climate characteristics from 2015 until present day, considering the trend of increase in temperature.

Chapter 2.5 has been amended in accordance to comply with comment no. 9.

25. Chapter 2.8 – Immovable cultural goods. Page 35 states: "It is also important to note that the location of the archaeological site of Ošljane, in the Requirements issued by the Institute for the Protection of Cultural Monuments, has been very inaccurately presented, as a space without a clearly defined location for the proposed Veteran's Villa building. It is not clear where the discovered structure is located within the defined zone". The opinion of the Institute for the Protection of Cultural Monuments of Belgrade was not attached.

Chapter 2.8 was elaborated in keeping with the Requirements issued by the Institute, no. 350-02-00104/2019-14, dated 21 March 2019.

26. With regard to the previous point, please indicate the exact position of the archaeological site of Ošljane in relation to the proposed building complex, as well as other archaeological sites.

Chapter 2.8 was elaborated in keeping with the Requirements issued by the Institute, no. 350-02-00104/2019-14, dated 21 March 2019.

27. Chapter 2.9 – Population and concentration of inhabitants does not provide precise data on the number of inhabitants living in the informal settlement formed along the landfill fence.

Chapter 2.9 has been supplemented by information received from city administration and is part of the Resettlement Plan which the City of Belgrade, in accordance with its commitments, handles.

28. Chapter 2.11 – Information on health status in Serbia. Please present data on the health status of the population in the wider area of the existing landfill, in order to determine the impact of the relevant project on the population health.

The Study has presented all available data on health status in Serbia.

29. Page 37 of the Study, Chapter 2.11 – Information on health status in Serbia, data from the Health Statistical Yearbook of the Republic of Serbia in 2016 is presented, indisputably, but this is not enough for us to be sure of the health impact of landfills on the population, i.e. it is not sufficient for us to analyze the cause and effect between unregulated landfills and chronic diseases in the population. The dense smoke produced during the fire at the Vinča landfill in 2018 and the associated health risks to the population in the impact zone were high. It would be interesting to know if there was an increase in the number of people with respiratory problems during that period and which diseases are associated with the Vinča landfill. Unfortunately, we do not have information about any such relation. In any case, please present data on the health status of the population in the wider area of the existing landfill, in order to determine the impact of the relevant project on the population health.

The Study has presented all available data on health status in Serbia.

30. Chapter 3. In this chapter, please present the Summary from the stability analysis of slope and interlayers of deposited material (given the historical landslides and displacements of soil, which can cause catastrophic consequences). The purpose of this analysis is to evaluate the short- and long-term stability of the landfill, assuming differences in waste material properties, from pessimistic to conditions which can usually be expected. Provide geometric presentation after landfill capping. Also, conduct the analysis for both dry and drained slope. The aim is to verify that the final configuration features the required safety factor against the slope breaking under stability conditions.

The answer to this comment is part of the answer for comments 12, 13, 14, 15.

31. Chapter 4 – Overview of main alternatives considered by the project developer, was not performed in keeping with the Rulebook on the Scoping of the Environmental Impact Assessment Study. Please elaborate all subchapters as specified by the Rulebook. Although new technologies are available today that can be applied to the Vinča landfill, no alternative technological solutions for the isolation of the existing and new landfill body, alternative solutions for the degassing system, or alternative solutions for the landfill leachate treatment plant have been presented. Given that the project developer has opted for the use of energy from waste, why is passive degassing mentioned in the description of the project as well? Also, in this regard, it is questionable whether reverse osmosis is the optimal solution.

Chapter 4 includes a description of alternatives considered in the project development phase.

32. The Study does not explicitly or specifically show the impact of the "old" existing landfill on the environment (rehabilitation) and the construction of the new landfill with accompanying facilities, including the EfW plant. Also, please analyze their cumulative effect on major environmental factors.

Monitoring of the current state of environment was performed on the basis of the current situation, which is largely caused by the impact of the existing landfill and customary practices in the area for decades. The quality of surface water, groundwater, leachate, air, soil, sediments, the presence of flora and fauna, were all investigated. All modelling included a prediction of future impacts over time, taking into account the reduction of the negative impact of the existing landfill over the years, following the planned schedule of rehabilitation works and the development and use of a system for controlled extraction of landfill gas from the existing landfill body, etc.

33. The results of chemical tests of the water samples taken from the piezometers should be presented in Chapter 5 - Overview of the environmental status on the site and the surrounding area.

Comment implemented.

34. The statement on page 18: “It was observed that increased concentrations of some parameters (turbidity, suspended solids, nitrites, zinc) were registered in Pz-5 which is not exposed to impact of the existing landfill. This situation was explained as a consequence of wash-off from the surrounding terrain (out of the existing landfill zone) and import of pollutants in groundwater. “This statement is not completely clear! What caused the increase in the concentration of these parameters? Are they the result of the geological composition of the terrain? Please explain!

Comment implemented.

35. Page 73, Table 10 shows the composition of waste in the municipal solid waste landfill, with the content of hazardous waste being 0.4%. Please explain the treatment or disposal of hazardous waste. What is done with that waste, where it is temporarily stored and for which period of time and which conditions must be observed for temporary storage of hazardous waste. Please state which documentation is to be kept.

The comment was implemented, and the text of the Study supplemented with: “Within the composition of household waste, the usual percentage is about 0.4% of hazardous waste. The method used for managing hazardous waste generated from households is primary selection and extraction, prior to collection and disposal of municipal waste.
A quarantine zone is provided for temporary storage of hazardous waste. The quarantine zone is an area with a fence and isolated infrastructure. If hazardous waste is detected in incoming waste, it will be stored in the quarantine zone until it is handed over to operators for treatment of the specific type of hazardous waste.”

36. With regard to the previous point, please also explain where hazardous waste from the existing Vinča landfill has been stored.

The answer to this comment is part of the previous comment.

37. Page 116 reads: “On the basis of data from literature and the results of testing of leachate from the municipal waste landfill, the following table gives characteristic composition of the leachate.” What does this mean? Were the results presented in the table obtained through chemical analysis of the leachate or were they extracted from the literature? Please explain!

The data presented in the table are from literature (from experience) and represent characteristic-typical ranges of leachate composition, while Table 13 shows the results of testing of leachate on site.

38. Furthermore, page 117 states: “For the purpose of designing the leachate treatment plant (LTP), the quality of leachate at the Vinča landfill was tested. Test results are given in the table. However, Table 13 states: Adopted quality of leachate for designing the plant. What does adopted mean? If the test results are presented, then why is the value adopted? Please explain!

The results were obtained by investigation; the values of quality parameters were within a specific range that varied more or less from one sampling to the next, and eventually values of parameters adopted for further calculation were determined using engineering logic. This principle is considered to be usual in the design process.

39. Page 119 states that the leachate treatment plant has been designed to operate at a temperature between -50^{o}C and 250^{o}C. On the basis of which indicators was the plant dimensioned, as the chapter containing information about temperature characteristics includes no clearly reached conclusion about average temperatures (see comment 21).

These temperatures represent limit values for optimum continuous automatic operation. If the temperature is outside this range, then the operator must intervene to adjust operating parameters and maintain guaranteed levels of discharge (for example, additional recirculation of leachate).

40. Table 16 gives the quantity of leachate generated on the landfill (water to be received and treated), including the EfW plant. The question is: What about leachate from the old landfill?

Calculate the total quantity of leachate, since the drainage channels drain the water to the lagoons (one collects leachate from the old and the other from the new landfill).

The text of the Study has been revised to comply with this comment.

41. Page 120 states: “The leachate treatment plant will only operate for a period of five years, after which all leachate will be transported to the EfW plant (not the subject of this project). Please specify the procedure covering the EfW.

The answer to this comment is part of the comment 41.

42. Given that EfW plant is not the subject of this Study, as stated in the Study itself, what is the point of showing the quantity of leachate for it (Table 16).

The answer to this comment is part of the comment 41.

43. Chapter 3.3. Overview of the type and amount of required energy and fuels, water, raw material, required building material. Please show in more detail the amount of the specified, or required, materials required for the project construction.

Chapter 3.1.3. is titled “Overview of the type and amount of required energy and fuels, water, raw material,” and there are no materials required for construction as it is not defined in the Rulebook.

44. Chapter 3.4. Overview of the type and amount of discharged gases, water and other liquid and gaseous effluent ... Please elaborate this chapter in more detail. Please supplement this chapter with data based on the operation of the old landfill so far, with the addition of newly projected values on the construction of the new landfill.

Chapter 3.1.4. Overview of the type and quantity of discharged gases, water and other liquid and gaseous effluent, viewed by technological units and the technology of their treatment, has been revised to comply with the given comment.

45. It is necessary to provide the quantity and characteristics of rainwater and wastewater.

The answer to this comment is part of the comment 45.

46. Specify the place where the excavated material from deepening the terrain, and expanding the landfill bottom will be deposited.

Comment implemented.

47. Chapter 4. Overview of major alternatives. It should be presented in more detail and more clearly. Specifically, this chapter does not contain some of the points provided for in the Rulebook, which I consider to be relevant. It is necessary to provide: a project implementation plan, that is, a timetable for the implementation of the project, as well as for its functioning and decommissioning; Commencement date and completion date of construction; pollution control; regulation of access and traffic roads; responsibility and procedure for environmental management, training, monitoring, contingency plans, etc.

The answer to this comment is part of the comment 45.

48. Chapter 5. Overview of the state of the environment in and around the site should present the current state of the environment. Please present and analyze performed measurements and thus determine the current state of major environmental factors.

The chapter has been revised to comply with the comment.

49. Chapter 5.1. Population. Data on the number of inhabitants living in the informal settlement is from 2016 inclusive. Please specify the exact number as of the first half of 2019, that is, the census in the population on the site proposed for the project development.

The chapter has been amended to comply with this comment and is in connection with the answer for the comment no.28.

50. In relation to the previous, please show the resettlement plan for the population living in the informal settlement, the starting date of commencement, i.e., how the persons will be taken care of, etc.

The chapter has been amended to comply with this comment and is in connection with the answer for the comment no.28.

51. The Study is missing the status or the report on the current status of population health, on the site itself and wider, in order to monitor the impact of the proposed project on human health.

The comment implemented and is in connection with the answer for comments 29 and 30.

52. Chapter 5.3. Water. Measuring surface water quality of the Danube as a final receiving body, at two measuring points, which are very far from the relevant plant, are not representative. Also, the results of the City Public Health Institute, which performed measurements at several locations, were commented, but no measurement results were provided.

The chapter has been revised to comply with this comment.

53. Prior to using the used water treatment equipment, please define the baseline status of the receiving body's water quality, that is, the Ošljanski creek, as required by the Water Requirements (point 4.19).

Prior to the start of operation of the wastewater treatment plant, the baseline status of the Ošljanski creek will be defined.

54. The physical and chemical properties of surface water for this project should have been presented within surface water, not groundwater, as provided in the Study.

This comment has been analyzed in Chapter 5.3.

55. Analysis of surface water analyzes was conducted at 7 locations, in March and June 2018. However, the results presented in Table 25 do not show described measuring points (only 2 samples in March and June and the remaining 5 in March). Also, Table 25 shows that leachate was sampled in March, when rainfall is most abundant and does not reflect the actual quality status (sample CW5). Further on, page 125 states that sample CW5 corresponds to the location of the Ošljanska pond and not to the landfill leachate as indicated below Table 25. Please explain!

The description of the locations is given in detail in the text and their positions are shown in Figure 112. CW5 is landfill leachate. CW4 belongs to the Ošljanska pond and this sample was taken in June when samples on the Danube River, upstream and downstream of the impact of the existing landfill were also taken.

56. It is necessary to examine the quality status of river sediment in watercourses downstream of the project, as potential contaminants of agricultural land;

Sediment samples were taken downstream of the existing landfill, as shown in Figure 114 and in Table 43.

57. Chapter 6. Description of potential significant environmental impacts relates to a description of all potential significant environmental impacts of the project, and it is necessary to describe all what can potentially impact the environment, in the context of cumulative effect due to the rehabilitation of the "old" landfill and construction of the new one with accompanying facilities, including the construction of the energy-from-waste plant (EfW).

The chapter has been revised to comply with the comment.

58. Namely, in accordance with the previous point, present as separate units, i.e. chapters: Potential impacts on the quality of water (surface and underground), air, soil, noise levels, odors (not mentioned at all), impact on climate change, vibration intensity, heat and radiation, etc.

The chapter was amended in accordance with the remark made.

59. Demonstrate separately impacts on landslide occurrence, landfill bottom stability;

The answer to this comment is given within Chapter 3.1.1. Calculation of slope stability of new, old and inert landfills under static and dynamic conditions.

60. The Study should include, as a separate point (under Chapter 6): Impact of the project on infrastructure with particular reference to residential buildings.

Chapter 6.0. has been elaborated in detail in accordance with the Rulebook.

61. Chapter 7. Environmental impact assessment in the case of an accident - Provide an impact assessment in the case of natural, geological, processes: landslides, floods, torrents, erosion, etc. This chapter does not contain: measures of prevention, preparedness and responsibility for an accident, as well as a measure of eliminating the consequences of an accident, i.e. remediation (according to the Rulebook). This chapter, in the event of an accident, should be supplemented with flood impact assessment. Namely, only the maximum water level of the Danube River was analyzed and it was found that the lowest part of the landfill complex was 10 meters above that level. However, the Ošljanski creek, which during periods of extreme rainfall can cause sliding and displacement of the deposited masses of waste (which occurred in previous periods and caused filling of the Ošljanska pond and outflow of landfill leachate directly into the Danube river) was neglected.

The impact of the Ošljanski creek on sliding and displacement of the deposited masses of waste has been eliminated with the construction of the retaining structure.

62. Number the environmental measures.

Comment implemented.

63. Supplement the environmental measures, where states to act in accordance with the design, with a specific procedure from the design. For example, measure: “Unpolluted rainwater shall be conveyed via appropriate drain pipes in accordance with the design.” should define a specific procedure for rainwater, i.e. where it is transported.
The same applies to other measures stating that it should be acted in accordance with the design.

Chapter 8.0. has been elaborated in accordance with the Rulebook.

64. Describe the sanitary-foul wastewater treatment equipment and show the designed wastewater quality exiting the plant. Supplement water protection measures accordingly.

The Study has been revised to comply with the comment.

65. The Study (page 135) states that the leachate will be discharged into the Ošljanski creek until the construction of the leachate treatment plant. How long will untreated leachate be discharged into the Ošljanski creek? If the time period is long, a different solution should be proposed to prevent discharging untreated water into the natural receiving body.

Untreated leachate will be discharged into the Ošljanski creek until the completion of construction of the lagoons for leachate on the lower platform (6 to 8 months), after which a trial test of the leachate treatment plant begins.

66. The measures do not specify what is the receiving body of treated leachate.

The Study has been supplemented to comply with the comment.

67. The layout showing the leachate wastewater treatment plant is not clear and does not contain a legend. One cannot see the method of collecting and draining wastewater to the plant, nor the exit of water from the plant.

The Study has been supplemented to comply with the comment.

68. Chapter 8 / Regular operation / Waste - define the measures related to landfilling of waste.

The Study has been supplemented to comply with the comment.

69. Prescribe environmental measures relating to the recultivation of the existing landfill.

It is not the subject of this Study. The Existing Landfill Rehabilitation Project was approved by the Ministry of Environment with the Decision issued under number 353-01-01516/2019-06, dated 24 July 2019.

70. Prescribe measures relating to the compliance of the designed landfill bottom with the requirements specified in the Regulation on disposal of waste at landfills (“Official Gazette of the RS, no. 92/10), Annex 2.

In accordance with the mentioned Regulation, adequate protection measures have been defined.

71. Prescribe designed measures relating to the spread of odors and external negative impacts (Regulation on disposal of waste at landfills (“Official Gazette of the RS”, no. 92/10), Annex 2).

The Study has been supplemented to comply with the comment.

72. Prescribe designed measures relating to the landfilled waste mass stability and associated infrastructure (Regulation on disposal of waste at landfills (“Official Gazette of the RS”, no. 92/10), Annex 2).

The Study has been supplemented to comply with the comment.

73. Chapter 9.2 / Environmental Impact Monitoring Program - Surface water monitoring states that the flow rate (probably referring to water flow) is made at discharge points of the upper and lower lagoons. What discharge points are meant?

Discharge of leachate is described in Chapter 3.1, Part 5. Upper platform and 6. Lower platform.

74. Within the same chapter, please address in more detail the following:
    - Provide for the control of waste on ionizing radiation when entering the landfill, using an appropriate ionization measuring device installed at the entrance to the complex (Decision of the Institute for Nature Conservation; point 21);
    - Provide for control of the acceptance of oily water from surfaces intended for washing and disinfection of dirty vehicles and containers as well as parking areas (Decision of the Institute for Nature Conservation; point 13);
    - Provide for regular monitoring of wastewater quality and quantity prior to discharge into the receiving body, in keeping with the provisions of the Law on Waters (Official Gazette of the RS, nos. 30/10, 93/12 and 101/16);
    - Carry out regular quality control of treated wastewater in accordance with Art. 99 of the Law on Waters (“Official Gazette of the RS”, nos. 30/10 and 93/12). If during the test it is determined that the quality of wastewater deviates from the maximum allowed values, the user is obliged to bring the water quality to a satisfactory level through additional treatment (Water Requirements, point 4.19).
    - Provide for measuring points for measuring noise level, present on a layout drawing.
    - Monitoring of the bird population is provided for, but what about the other fauna and flora, which is in Chapter 5.5. portrayed as rare and endangered.

All of the above is covered in detail by the text of the Study, proposed protection measures and planned monitoring.

Comments submitted by Ksenija Radovanović, Citizens’ Association “Right to the City” / “Let's Not Drown Belgrade”

1. The Environmental Impact Assessment Study for the project of new landfill with accompanying facilities at the Vinča site in Belgrade considers following facilities and structures: 1. Entrance-control zone; 2. CDW plant platform; 3. New landfill; 4. Handling platform; 5. Upper platform with lagoons for leachate and rainwater; 6. Lower platform with lagoons for leachate and rainwater; 7. Protection dam of the old landfill body (retaining structure); 8. Flaring system, although the Decision on scoping of the environmental impact assessment study for the project of new landfill with accompanying facilities at the Vinča site in Belgrade, issued by the Ministry of Environmental Protection, number 353-02-1686/2018-03 dated 29 August 2018, does not cover all plots, i.e., does not cover all facilities that are the subject of consideration of this IA.

Only if a random error was made and individual plots were not included. Numbers of plots have been revised.

2. The IA does not contain the mandatory parts of documentation as stipulated by the Rulebook on Scoping of the Environmental Impact Assessment Study ("Official Gazette of the RS", no. 59/05). It is important to note here that the IA does not contain the copy of the map showing cadastral plots on which the proposed development is to be built, with drawn in disposition of all facilities, based on which it would be possible to conclude whether the scope of this IA corresponds to the Decision on scoping of the environmental impact assessment study for the project of new landfill with accompanying facilities at the Vinča site, in Belgrade, issued by the Ministry of Environmental Protection, number 353-02-1686/2018-03 dated 29 August 2018.

The copy of the map showing cadastral plots is attached to the Impact Assessment Study.

3. The IA does not contain all attachments listed in the section "List of technical documentation" on page 264 of the IA, making it impossible to verify the information listed in the content of the IA.

The list of technical documentation includes the list of all design volumes, technical and planning documents used to describe the plant and define the impacts and measures provided for by the project, which were cited as the source of information in the Study. Law does not provide for to make available complete technical and planning documentation for review in the process of undertaking the impact assessment study, but an excerpt from the project with main details, based on which is possible to see what is the subject of the study. The complete technical documentation is submitted to the authority responsible for issuing the construction permit.

4. The composition of multi-disciplinary team: the multidisciplinary team that conducted the Study does not include even one archaeology or conservation expert, which is a violation of Article 19 of the Law on Environmental Impact Assessment stipulating that for the purpose of undertaking an environmental impact assessment study a multidisciplinary team shall be formed, composed of persons having proof of qualification for undertaking an environmental impact assessment study, i.e. for fields that are the subject of the study in which undertaking they participate. Since the scope of the IA includes the property which enjoys prior protection, namely Ošljane, it is necessary to enrich the team with persons qualified to assess the impact of the proposed construction on cultural heritage.

A team member is a qualified person for archeological sites, using geophysical survey method (Dr. Spec. Dejan Vučković).

5. The subject of this IA is not in compliance with the provisions of the Detailed Regulation Plan of Vinča sanitary landfill (("Official Journal of City of Belgrade", no. 86/18) that directly links the construction of new landfill with accompanying facilities and development of K5 unit on which the new landfill is to be built, with the development of the existing landfill, in order to reduce the damage and the cumulative effect of commissioning new facilities on the Vinča landfill site with adverse environmental impacts of long-standing non-sanitary waste disposal in Vinča being present.

Planning and construction of the new landfill completely complies with the Detailed Regulation Plan. The Existing Landfill Rehabilitation and Recultivation Project was developed and the Ministry approved it in July 2019.

6. We remind (the IA confirms the same in its introductory section) that the construction project of proposed facilities in Vinča has started with the aim of remediating these adverse impacts and establishing a legal waste management system in Vinča: "In the procedure of harmonizing the legislation of the Republic of Serbia with EU regulations, EU directives concerning solid municipal waste have been also incorporated. Considering the size and significance of the Vinča landfill as well as numerous problems occurring in its operation, the City of Belgrade initiated this project to rehabilitate and maintain the Vinča landfill i.e. take care of the existing landfill (old landfill), construct and develop a new landfill, as well as construct an energy-from-waste plant (EfW)."

The overall project defined through a private public partnership involves the rehabilitation of the existing landfill as a necessary and needed activity. The project of existing landfill rehabilitation and recultivation was developed in keeping with legal regulations and was approved by the Ministry of Environment in July 2019.
Rehabilitation of a landfill is carried out in accordance with the rulebook and regulation regulating this field. Rehabilitation projects are not on the list of projects that require an environmental impact assessment.
On the other hand, project of construction of new landfill with accompanying facilities and EfW plant, in accordance with the Law on Planning and Construction and the Law on Impact Assessment, are projects that need to enter the procedure for obtaining approval for environmental impact assessment.
The scope of the study is defined by the Location Requirements, the technical documentation prepared at Preliminary Design level (IDP) and the scope of future building permits, pursuant to the Law on Planning and Construction and the Law on Environmental Impact Assessment.

The Law on Planning and Construction allows projects to be implemented in phases. Accordingly, in order to obtain the requirements and approvals from holders of public powers, two environmental impact assessment studies were undertaken, as well as the Existing Landfill Rehabilitation and Remediation Project.

7. We note that the project developer seems to be juggling throughout the entire IA with actual subjects of this IA in such a manner as to cover up the actual state of the environment in and around the project site, thus covering up actual effects of the project on the environment. This is quite obvious if we consider the example analyzing the impact of the existing non-sanitary landfill, which is used as a reason for initiating the project, but the IA does not address the environmental impact of the existing landfill, nor does it take into consideration its rehabilitation (not mentioned even whether rehabilitation is the subject of any other IA and which), nor does it take into account the impacts of the existing landfill in analyzing the cumulative effects of the plant and determining measures for their remediation.

The answer to this comment is part of the comment no. 54.

8. Also, the project developer, in a similar manner, chooses to focus only on some parts of one technological process under this IA, although it is clear that it is not possible to divide and interpret the actual environmental impact in such a manner, randomly.

The answer to this comment is part of the comment no. 54.

9. Thus, this IA analyzed part of the “Flaring Platform”, in view of the fact that flares are used for burning the landfill gas collected by means of the piping system from the new (and the existing?) landfill. However, the IA states that “the flaring system is entirely connected to the Biogas Engine Plant (BEP), and that the “BEP system” is not part of this Study", waiving thus the responsibility to assess the environmental impact of burning the landfill gas collected from the landfill body by means of the piping system whose construction is part of this IA and which is incinerated using the flaring system which is part of this IA as well.

The answer to this comment is part of the comment no. 54.

10. To the same effect, the project developer does not consider the solidification of hazardous waste resulting from the EfW plant operation, although this waste will be deposited at the new landfill, whose construction and environmental impact assessment is the subject of this IA. This is particularly important because the solidification of this type of waste is only temporary process and there is a high degree of certainty that, after starting of cement destabilization process, this waste will be considered hazardous waste. Considering the fact that Serbia does not have any landfill for disposal of this type of hazardous waste, and that disposal of hazardous waste at municipal waste landfills is strictly prohibited under the EU Landfill Directive, it is obvious that in this way, the project developer wants to circumvent the issue of dealing with hazardous waste, exposing thus the environment and the population to highly carcinogenic substances generated by waste incineration in the EfW plant.

Stabilization of APC residues is recognized in the EU as the best available technique (BAT) since

BREF for Waste Management exists.
Stabilization of APC residues with hydraulic binder was developed in France 1993 and confirmed for application by Regulation from 31 December 1992 / 1 April 1995 and it is applied at 5 locations in France to enable the acceptance of APC residues (also for all hazardous particulate waste) at landfills. This stabilization process has been applied at 13 locations in total in France since 1 April 1998.
This process involves reducing the solubility of waste (soluble fraction) to the threshold set under valid regulation and crystalizing salts and heavy metals in a stable form for a long-term period.
Up to date, more than 10 MT of waste has undergone this procedure, and almost 5 MT of APC residues has been stabilized and stored over almost 25 years.
The project developer confirms that solidified APC residues will end up in designated cells of the new landfill at the Vinča site and will not be disposed outside the complex. As the treatment of APC residues consists of solidification and stabilization, the resulting product will be fully in compliance with the requirements of Directive 2002 (Annex 1 - § 2.3) and could therefore be directly accepted at the new landfill.
According to BREF Best Available Techniques for Waste Treatment (2018) and Waste Incineration (2006 and 2018 Draft), the solidification process of flue gas residues is relatively straightforward for use and necessary technical knowhow is widely available. The characteristics of washing out the solidified product can be significantly improved compared to the entrance of untreated waste. It is probably the most commonly used method for the treatment of FGT residues and is widely used in Europe and Japan. Further, washing out of collected waste will be collected and treated as described in the EIA.
The carbon footprint in FGT treatment is considered negligible compared to other emissions.

11. Similar procedure is also used by the project developer when chooses not to analyze the cumulative effect of the construction of new landfill with accompanying facilities and the EfW plant, thus refusing to take responsibility for analyzing the impact on air quality after the plant installation, in relation to the baseline status of air quality, as well as the fact that Serbia does not have any laboratory for analysis of numerous hazardous substances resulting from combustion process (in the EfW plant or as a consequence of fire), including, among others, highly carcinogens dioxins and furans.

The answer to this comment is part of the comments 54 and 56.

12. It is ultimately unbelievable that it was not possible to precisely measure the distance of landfill from the nearest settlement and the facility in the surroundings and to attach a precise view of this distance. Namely, there are substantial mistakes found even in the textual description and table showing that they who conducted the Study did not not care about the consequences the inhabitants living in surrounding settlements may suffer due to the operation of the proposed plant. In the answer from EBRD we got information: “The nearest free-standing structure in the Vinča settlement based on orthographic analysis is at a distance of about 1050 m (SE from the existing landfill, near the cemetery)”. On the other hand, measurement using available tools (GiS, Belgrade Land Development Public Agency) shows that this distance is less than 1000 m, which has been also confirmed by consultant of IFC Environmental and Social Scoping Study for the Belgrade EfW Project in Serbia (Fichtner, April 2017) where it is clearly stated that the distance between the Vinča landfill and the nearest settlement is only 800m. We note that according to the regulations the construction of activities falling into the category of large polluters is prohibited at a distance less than 1000-1500 m from an inhibited settlement.

The Study has been amended to comply with the comment.

13. Chapter “Overview of pedological, geomorphological, geological, hydrogeological and seismic characteristics of the terrain” only considers “Geological and hydrogeological characteristics of the terrain on the new landfill project site” and “Geotechnical conditions on the retaining structure site”). However, the subject of this IA is not only the construction of new landfill and the construction of retaining wall, but also:

    1. Entrance-control zone;
    2. CDW platform;

3. Handling platform
4. Upper platform with the system of channels and lagoons for collection and evacuation of rainwater and leachate;
5. Lower platform with the system of channels and lagoons for collection and evacuation of rainwater and leachate and leachate treatment zone (LTP);
6. Flaring system.

Supplement the IA with analysis of geological and hydrogeological characteristics of the terrain in the area of each of the mentioned facilities.

When referring to the New Landfill Project, we are referring to the entire area where the new landfill and accompanying functional units such as the entrance control zone, CDW and other platforms, the flaring system, etc. will be built.
The results of geotechnical investigation works are presented within the Geological-geotechnical study and present relevant data in relation to geological and hydrological characteristics of the wider area, which covers the area of the new landfill, but also other functional units within the complex as indicated.

14. The project developer provides much more detailed analysis of the pedological, geomorphological, geological and hydrogeological characteristics of the terrain in the Environmental Impact Assessment Study conducted for taking loan from EBRD. What is the reason for having these more detailed measurements left out from this Study?

ESIA is not subject to the environmental impact assessment procedure pursuant to Serbian legislation. The scope of ESIA is defined by banks that need to be informed in detail about projects for which they need to decide whether or not they want to fund them. The approval of ESIA document is given by banks and it is not binding for the project developer in terms of the implementation of that project, it only influences whether the given bank will participate in funding the project.
On the other hand, the scope of EIA documents is defined by the legislation of the Republic of Serbia and as such is not the same document in content as the ESIA study. The approval of EIA documents is given by the Ministry of Environment and further implementation of the project depends on its outcome.
The procedure for this particular ESIA study was initiated earlier and during the procedure it had a large number of reviews and analyses of the document itself with the potential to influence the development of the text and the scope of survey, resulting in many things being amended and adopted on the fly, before the public debate was held for this study.
On the other hand, the procedures for EIA studies started a little later than the procedure for ESIA, but within the legally defined procedure it was not possible to significantly amend the text of the document before the public debate. Therefore, some of the results and information obtained in the meantime were not included in the text for public debate, which has now been corrected in the new version of the document.

15. The relevant IA is missing the information that the design engineer responsible for developing the document Geological-geotechnical investigations for design and construction of new and remediation of old landfill in Vinča, Energoprojekt Niskogradnja (November 2017) has stressed out that it is necessary to continuously measure groundwater level in the piezometers at least for a period of one year, in order to be sure of the results of the abovementioned investigations (page 283 EBRD Study). Why is this information omitted from this IA? Is the document Geological – geotechnical investigations for design and construction of the new and remediation of the old landfill in Vinča, Energoprojekt Niskogradnja. (November 2017) attached to this IA, and why isn't it? Have measurements been performed for a period of no less than one hydrological year?

The Geological-geotechnical study is attached to the Study. Groundwater level has been measured continuously since 2017 to present and this practice will be continued in the future as well as monitoring of other technical parameters (see answer to the comment no. 65).

16. This IA is missing the conclusion on (im)permeability of the soil beneath the existing landfill body, despite the fact that this is the key input in assessing potential remediation of the

existing pollution of soil, groundwater and surface water in the area where the development of the facilities covered by this IA is proposed, particularly for the following reason:
- Lithological description of layers for Pz1 and Pz2, located on the key points for the analysis of leachate impact on groundwater beneath the existing landfill body (at the bottom of the landfill slope, i.e. Ošljanski creek) which indicates the appearance of easily friable degraded marly clay, even at depths of 7 to 10m, even 13m. In view of the terrain morphology, sloping towards the area of Pz1, Pz2 and taking into account that soil characteristics at higher levels of the slope show better homogeneity, it is quite expected that leachate would generate in this particular zone since the soil cannot stop leachate percolation into deeper layers;

The conclusion was made according to investigation works carried out by expert geological and geotechnical staff. Interpolation of borehole data is a standard technique used to describe geological characteristics of terrain, because the geological characteristics of an observed area do not change significantly. In addition, making reasonable assumptions is part of the expertise of hydrogeologists, and this assumption can only be confirmed by piezometers installed on the landfill, which would measure leachate level and in deep formations (unfortunately, since the landfill is not completely stable before remediation works, the durability of such monitoring infrastructure is pretty uncertain ...). The interpretation of data in the comment is one-sided. Marly soil (marls) occur as a product of weathering of fine-grained loess/clay, a material is formed which fills pores. Permeability depends on soil structure and deposits and porosity, as well as on the density and mineral composition of the porous medium. If pores are finer, there is more physically bound water to rocks/deposits, which also explains less permeability. Fine grained soils (such as clay or loess) are much less permeable than coarse grained deposits (sand, gravel). The draft hydrological model shows, however, that, in the absence of very low vertical permeability in diluvium or waste, it is not possible to achieve a large difference between groundwater leachate and groundwater. Materials are therefore unlikely to have high permeability and as mentioned above, the exchange between the two aquifers is therefore low. In the layers below the project site, due to the geological formation, no significant aquifer can be formed as specified in the EIA, which supports the source yield around the existing landfill, varying from 0.05 to 0.3 l / s. Generally, due to the dominant presence of clay sediments characterized by low water supply and modest yield, from the hydrogeological point of view, the deposits of the project site can be considered as poorly permeable. This is confirmed by the results of the water permeability test for the deposits determined by Lefranc injection test.
The data used (groundwater level) in the EIA includes the stated period, data has been collected in the meantime and the design engineer has complete data on groundwater for one hydrological year: groundwater monitoring is a continuous process that is improved and used for the groundwater model in order to obtain improved assumptions.
A monitoring plan has been developed with the aim of continuously assessing the impact of the project on groundwater quality and regime and the effectiveness of the proposed measures. Shallow and deep piezometers will be used upstream of the new landfill, between the future landfill and the existing landfill and downstream of the entire landfill complex, to cover the entire subject area and both identified aquifers. The monitoring will consist of four phases, out of which Phase I will be to completely determine the groundwater baseline quality against the parameters according to the requirements of the relevant Serbian and EU legislation prior to commencement of works, Phases II and III will cover different parts of the operational phase and Phase IV will monitor the phase after decommissioning.

17. The information given further in the EBRD Study indicates the occurrence of rock mass cracks and marls beneath the clay layer leading to percolation of water into deeper layers (page 277);

The answer to the comment is part of the comments 64 and 65.
As regards the comment that the soil is unsuitable for the project, the situation is actually opposite as low water permeability of the soil is extremely suitable for the development of the proposed infrastructure involving the new landfill.
An important parameter for the Vinča landfill is the permeability of soil beneath the landfill bottom which can modify the infiltration rate. Infiltration values have been measured within old and recent studies conducted on periphery of the site at several locations upstream and downstream of the landfill. Based on geotechnical investigations carried out on periphery of the disposal site,

maximum and minimum permeability values are 10-8 and 10-9 m/s, respectively. Permeability can be further reduced by taking into account a clogging phenomenon that is often observed on surfaces of ponds. Another phenomenon is the possible and probable saturation of the soil with water beneath the landfill bottom, which prevents further infiltration and thus creates an artificially reduced permeability value.

18. The design engineer's assessment specifying that he/she cannot be sure in absolute correctness of presented assumptions, and that it shall be necessary to monitor groundwater levels in the piezometers, as well as the Danube water level, for a period of at least one hydrological year (page 283).

The answer to the comment is part of the comments 64 and 65.

19. Have investigations been conducted at locations reported to have water source and of what yield?

Complete hydrogeological and hydrological investigations and analysis of the terrain were also carried out within the technical documentation, on the basis of which designs were elaborated and revision of such elaborated designs was performed by experts and responsible design engineers who verified with their signature and seal, personal name and surname, all of the above technical and design documents.

20. What geological investigation method was applied? How many boreholes were installed? How many measurements were performed? At what heights? What were the results of measurements, pouring test and lithological analysis of drilled cores? Please demonstrate the results for each of the boreholes (EP-1 to EP-10) shown in Figure 4. The position of piezometers and other excavated boreholes and pits, Geological-geotechnical investigations for design and construction of new landfill in the Vinča municipal waste landfill complex, Energoprojekt Niskogradnia, 2017, in particular of those relevant to the subject of this IA.

Description of geotechnical investigation works and a broad interpretation of their results are given in the Geological-geotechnical study, and an adeqaute report from this study is given in the Study.

21. In April 2018, the Regulation on the Program of Systematic Monitoring of Soil Quality via Indicators for Assessment of Soil Degradation Risk and Methodology for Creation of Remediation Programs was amended, therefore, the measurements and the overview of results should be complied this regulation accordingly.

All results obtained after the adoption of the mentioned Regulation are presented in accordance with the amendments. It should be noted that there is no difference in the limit values defined in the 2018 Regulation and 2013 Regulation.

22. The IA makes reference to the document "Report on Groundwater Quality", prepared by Energoprojekt Hidroinženjering JSC, Belgrade, in April 2018. However, this document is not attached to this IA.

The answer to the comment is part of the comment no. 10.

23. "Based on the analysis of water quality conducted in November 2017 and March 2018, it was concluded that water samples from piezometers that are exposed to the impact of the existing landfill (NP-11, Pz-1, Pz-2 and possibly Pz-4) differ from those that are not under the landfill impact with respect to their physical-chemical composition. It was noted that increased concentrations of some parameters (turbidity, suspended solids, nitrites, zinc) were registered in Pz-5, which is not under the impact of the existing landfill. This situation was explained as a consequence of wash-off from the surrounding terrain (out of the existing landfill site) and import of pollutants into groundwater."

Pz5 piezometer was installed at a water divide, where there is no water runoff, so that it remains for a long time in that zone "stagnant water". For this reason, it is turbid water, with a slightly higher concentration of suspended solids and nitrites. It is not about groundwater pollution, but about local pollution. In support of this, Pz5 piezometer was installed on a section representing a

road by which collectors of secondary raw materials transport secondary raw materials, resulting in an increase in organic matter at this locality.

24. What is the conclusion reached on the groundwater quality at the Vinča complex site, in relation to the geological soil composition? Disclosure of non-systematized data on measurement results along with rather unclear conclusions shows that the project developer is playing with the key data on the status of environmental factors.

Chapters 5 and 6 of the Study have been revised.

25. Considering the fact that the IA chapter that was supposed to demonstrate a baseline environmental status does not give any more information on groundwater quality measurement results, i.e. the impact of leachate penetration from the existing non-sanitary landfill to the groundwater, this chapter should be supplemented (and the chapter on baseline status) with clearly specified data on the measurement results for each exploratory pit with (or without) piezometer and reference values for each compound analyzed, as well as with description of the geological soil composition at the point of sampling or in the area covered by waste deposits, which has an impact on the plants subject of this IA – construction of the new landfill and rainwater and leachate collection system, their treatment and discharge into the Danube.

Chapters 5 and 6 of the Study have been revised.

26. Geotechnical conditions at the retaining structure site:
    The IA refers to the groundwater analysis in order to determine the aggressiveness of groundwater on concrete and reinforced concrete, conducted by Zaštita na radu i zaštita životne sredine (*Occupational and environmental protection)* "Beograd" Ltd in March 2017, more than 2 years ago. Repeat the measurements.

For the purpose of designing concrete structures, groundwater aggressiveness analysis from 2017 is sufficient. Prior to commencement of concrete works, an additional analysis will be conducted as part of a standard procedure for designing concrete mixes.

27. Also, with respect to foregoing design engineers' comments, provide guarantees that the specified groundwater levels have been determined with full certainty as relevant to assessment of average, minimum, and maximum groundwater levels in the zone of the retaining structure.

The guarantee is provided by the stamp of responsible engineers who signed the technical and design documentation, as well as the reports on expert inspection of designs.

28. The IA refers to the document "Study on geological conditions for design and construction of the retaining structure in the Vinča municipal waste complex'', developed by Hidrozavod DTD Novi Sad in 2018. However, this document is attached to the IA.

The answer to this comment is part of the comment no.10.

29. DATA ON WATER SUPPLY SOURCE The map with drawn in boundary of sanitary protection zone of water supply is missing.

The answer to this comment is given in the attached Requirements issued by PUC "Belgrade Waterworks and Sewerage".

30. Precisely specify the distance of the proposed complex (not only the existing landfill) from the pumping stations, distance from the boundary of water supply source protection and protection measures for water areas from the project impact. Specify the distance of the planned complex from the boundary of the alluvial plain zone which is affected by high level of groundwater and surface water / floodplains (Master Plan of Belgrade, Map 7. Water and water areas), and protection measures for water areas from the impact of the project.

The answer to this comment is given in the attached Requirements issued by PUC "Belgrade Waterworks and Sewerage".

31. CLIMATE CHARACTERISTICS WITH METEOROLOGICAL INDICATORS -The IA copies data for the period 2000 - 2015, and shows them aggregately, without drawing conclusions of actual importance for this IA. How does the IA relate to thepost-2015 period which witnessed increasing oscillations in maximum and minimum values of the analyzed climate characteristics?

The answer to this comment is part of the comment no. 20.

32. The diagram of mean monthly air temperatures for Belgrade weather station (for the period 2000-2015) does not show data mentioned in the name of the diagram. View of average temperatures is missing, by month, for each year between 2000 and 2015, which would show a trend of temperature increase.

The answer to this comment is part of the comment no. 21.

33. There is no drawing showing position of each of the individually listed natural protected area. There is no drawing showing distances between the proposed facilities and each of the individually listed protected natural area. The distance of the proposed complex in Vinča from the boundary of ecological network area of particular ecological importance “Confluence of the Sava and the Danube rivers” which is also declared as an international IBA (important bird area, RS017IBA) is inaccurate! If there were a map with precisely drawn in boundaries of protected areas, it would be clear that the distance of the proposed complex from the boundary of the IBA is 180m (one hundred eighty meters), and not 9 km as specified in the IA. This information was presented in the response of EBRD to the comments on the ESIA Study prepared by the project developer for bank loan approval process.

The answer to this comment is part of the comment no. 24.

34. Photographs documenting described landscape features and precisely defined observation points are missing.

The Study has been amended to comply with the comment.

35. Drawing showing project boundaries with the boundaries of Zone 1 and Zone 2, with the layout showing the position of the cultural property which enjoys prior protection “Ošljane” and other registered archeological sites is missing.

The Study has been amended to comply with the comment.

36. Drawings showing positions of inhabited settlements surrounding the landfill complex are missing. The list of regulations governing minimum distances between settlements and facilities and the landfill complex is missing. Data on the number of inhabitants of Veliko selo, located at a shorter distance from the landfill complex compared from the Vinča settlement (Section 2.0) is missing. How many inhabitants are living in the informal settlement located on the landfill body on the day of the PA presentation for public debate?

For graphical presentation and numerical description of the distances of the mentioned facilities from the boundaries of the landfill complex, see page 2 of Chapter 2. LOCATION DESCRIPTION.

See Chapter 5.1 for information on inhabitants living in the informal settlement.

37. Data on health status must be supplemented with the impact assessment of pollution source in air, water and soil on the population health? Also, it must be supplemented with a comparative analysis of Serbian population health and population of the region and the EU, more specifically, with the incidence and mortality rate of most common diseases, in order to have a clear insight into the population health status. For example, Serbia is on the 18th place in Europe in cancer incidence, but it holds the 2nd place in cancer mortality rate (Serbian Medical Society, 2017). Unless supported by the above additional analysis, data presented in the IA cannot be considered relevant data for actual impact assessment of the proposed development on the health of population of Belgrade and Serbia.

The Study is not a document comparing the health status of populations (Serbia, EU, world ...) nor a place for a comprehensive epidemiological study. All modeling and calculations refer to

world standards / references that have been put in place to prevent health problems within the global population (taking into account the "normal" portion of vulnerable populations).

All available population health data have been presented in the Study.

38. Is the construction of the retaining wall preventing the sliding of the existing landfill body part of the project or not? Is rehabilitation of the existing landfill part of the project or not? Why does not Chapter 3.0. Project Description contain characteristics and phases in execution of works? What phase of construction works on the new landfill does include the construction of the retaining wall and rehabilitation of the existing landfill?
    Is rehabilitation of the existing landfill part of the project or not? Why does not Chapter 3.1 Description of facilities, proposed production process or activities, their technological and other characteristics, contain characteristics and phases in execution of works? What phase of construction works on the new landfill does include the construction of the retaining wall and rehabilitation of the existing landfill?

The answer to this comment is part of the comment no. 54.

39. Water supply to the complex: It is missing a clear overview of demands of all the facilities within the planned complex in Vinča, in relation to the existing capacity of the water supply network and plans for its expansion. Given that the IA does not contain the Requirements of PUC Waterworks and Sewerage issued along with Location Requirements no. 350-02-00104/2019-14 dated 12 April 2019, and that the presented data differs from the data specified in the Detailed Regulation Plan of “Vinča” Sanitary Landfill, there is no possibility to determine with certainty that unobstructed supply with sanitary and fire water within the boundaries of the complex will be provided.

Supply of drinking and fire water will be provided to the Vinča complex in sufficient capacity. See Chapter 3.1 of the Environmental Impact Assessment Study, Water supply of the complex, and you can also see attached Location Requirements issued by PUC Belgrade Waterworks and Sewerage.

40. Foul sewage system in the complex: It is falsely claimed that “upper platform” is the final destination for used water, as described therein: “Treated water shall be discharged into the perimeter rainwater ditch, transporting this water to lagoons on the upper platform”. It should be clearly stated that there is no city sewerage system in the area of the proposed complex, and that the local network has been proposed as well as discharge of treated foul water into the Danube. Given that the IA does not contain the Requirements of PUC Waterworks and Sewerage issued along with Location Requirements no. 350-02-00104/2019-14 dated 12 April 2019, nor does it contain any requirements set forth by the competent water management institution stipulating the requirements governing discharge of foul water into waterways, and in view of the fact that the data presented in the IA differs from the data specified in the Detailed Regulation Plan of “Vinča” Sanitary Landfill, there is no possibility to determine with certainty that smooth collection and discharge of foul sewage will be ensured within the Vinča complex.

The answer to this comment is part of the comment no. 58 and in Chapter 3.1 of the Study.

41. 2. CDW plant platform: Figure 24, CDW platform layout drawing – illegible. Figure 26. Estimated flow of material through CDW plant - in English?!

Translation has been added in the text of the revised Study.

42. What treatment method is planned for solidified hazardous waste? Considering the fact that there are no installations for disposal of hazardous waste in Serbia, there is a danger of inadequate disposal. How does the planned disposal of solidified hazardous waste relate to the EU Landfill Directive which DOES NOT ALLOW disposal of hazardous waste at non-hazardous waste landfills?

The answer to this comment is part of the comment no. 58 and in Chapter 3.1 of the Study.

43. It is necessary to emphasize here that the solidification of hazardous waste is only a temporary solution. Namely, since over time the solidified mass will disintegrate, it is clear that

proposed solidification does not guarantee permanent prevention of dangerous substances penetration.

The answer to this comment is part of the comment no. 58.

44. Is there any analysis of climate footprint of the cement used in such a way, performed for the purposes of the ESIA?

Emission factor of 0.507 tons of SO_2/ton of clinker (IPCC Good practice guidance and uncertainty management in national greenhouse gas inventories). But a significant portion of SO_2 produced during cement production is reabsorbed into concrete during the product life cycle through a process called carbonation. A significant study estimates that between 33% and 57% of CO_2 emitted from calcination will be reabsorbed through carbonation of concrete surfaces over a 100-year life cycle.

45. Estimated quantity of excavated soil material: Specify the method of and place for disposal of excavated material until the moment of its use for covering the landfill.

Temporary disposal of excavated material is proposed in the area reserved for phase III of the project for 2021-2046 period (TC LND 47_17048-PGD-10-03.3-Temporary storage of excavated material-17048-PGD-10-03.3).

46. Morphological composition of municipal waste: The IA provides data on municipal waste composition citing the document "Environmental and Social Scoping Study for the Belgrade WtE project in Serbia for 2012-2014 period". However, the origin of the document is unclear, as well as the methodology applied and the source of data contained in, and the document is not attached to the IA.

Baseline data on the estimated quantity of waste generated and collected in the relevant territory is provided as part of the tendering documentation and defined within a study prepared by Fichtner. The answer to this comment is part of the comment no. 10.

47. Explanation of disposal method of hazardous waste, which accounts for 0.4% of municipal waste, is missing, given that it is not proposed to permanently dispose hazardous waste within the Vinča complex.

0.4% of hazardous waste in domestic waste is common value. The best method to treat this waste is to segregate it before it is collected and disposed in a designated place, as well as the right way of handling it by the population.

A quarantine area is proposed for temporary storage of hazardous waste delivered to the operator. The quarantine area is an area with a fence and isolated infrastructure. If hazardous waste is detected in incoming waste, it will be stored in the quarantine area until it is returned to the owner as soon as possible, in accordance with the regular procedure. The answer is provided in Chapter 3.1.

48. Overview of waste composition and disposal requirements for waste from the EfW plant is missing.

Baseline data on the estimated quantity of waste generated and collected in the relevant territory is provided as part of the tendering documentation and defined within a study prepared by company Fichtner. The disposal of residues from the EfW plant is addressed in Chapter 3.1.

49. Estimated leachate quantity: Is there an estimate of leachate quantity from the existing landfill body, before, during and after its rehabilitation?

Leachate quantity from the existing disposal site was taken into account in the phase of dimensioning lagoons and LTP capacity assessment.

50. Rainwater drainage system: Is there an estimate on rainwater quantity from the existing landfill body, before, during and after its rehabilitation?

Only the quantity of rainwater after rehabilitation is considered with regard to the proper sizing of the wastewater management system in the complex.

51. Flaring system: “The position of the proposed flaring system, as part of the landfill gas utilization system within the BEP plant (not the subject of this study), is on cadastral plot KP6-7”.

The flaring system is covered by the Location Requirements for the new landfill.

52. Which study is a part of? What are the conclusions of that study?

The flaring system is described in detail in Chapter 3.1 of the Study.

53. It is falsely stated that KP6-7 is cadastral plot designation, since DRP uses a designation KP6 (1-7) for building plot designation. Please specify the cadastral plots on which the platform with the flaring system is proposed to be built.

The flaring system is described in detail in Chapter 3.1.

54. “The flaring system is entirely connected to the Biogas energy plant (BEP)”. Is treatment of collected gas in the BEP plant part of the same technological process of landfill gas collection and utilization? Why is the environmental impact assessment of the same technological process divided into two different studies?

These are two separate parts of the process of the single landfill gas utilization system - one relates to the process of extraction, collection and transport of gas, while the other relates to the combustion process. Different building permits cover these two parts of the system. But the entire gas utilization system is described in both Studies, in more or less detail, depending on the scope of the study defined by the Location Requirements and the projects for which the studies are undertaken.

55. “The main piping for transport of landfill gas from the existing and the new landfill for non-treated waste enters at the center of the flaring system plateau, opposite to the gate and entrance of the internal road”. Are works (the installation of degassing wells (biotrns)) on the existing landfill body part of this IA? Why not? How is it possible to assess the characteristics of the plant and the impact of the plant on the environment, if there is no clear input data, i.e. characteristics of all processes critical for the operation of the observed plant are not known.

The entire landfill gas utilization process and the description of the network on the body of the existing and new landfill are described in the study for the landfill - Chapter 3.1 of the Study.

56. “To the lagoon for collecting leachate from the part of the landfill intended for disposal of non-treated waste (“non-treated waste I and II”) comes wastewater from the IBA zone (part of the EtW plant which is not the subject of this study)”. Which study is a part of? What it is not a part of this Study? Is the creation, transport and collection of leachate from the IBA zone a part of the same technological process, or is it possible to determine the conditions for leachate collection without analyzing the origin, transport and final destination?

The answer to this comment is part of the comments no. 2 and no. 54. IBA zone is part of the Environmental Impact Assessment Study for the EfW plant.

57. Lower platform, Leachate collection and evacuation: “To leachate lagoons on the Lower platform comes also leachate from the existing (“old”) landfill which is subject to closure and recultivation (not the subject of this Study)”. Which project is a part of? How can the developer be certain that the technology of leachate treatment and lagoon liners is suitable for safe treatment of leachate from the body of the existing landfill if it “is not the subject of this Study”?

Leachate has its their characteristic values (within theoretically determined practice-based ranges). On the other hand, in addition to these characteristic values, the study provides an overview of specific values of leachate analysis from the site. By combining the experience and values obtained from analysis of leachate from the site, the design engineer has sufficient information to choose appropriate treatment technology and other elements, which design process implies. The IBA zone is part of the Environmental Impact Assessment Study for the EfW plant.

58. “Upon closure of the “old” landfill and its recultivation, and after completion of leachate percolation through the “old" landfill, leachate will be re-pumped into the lagoon on the Upper platform”. When? What quantity? Why?

Chapters 3.1 and 6 have been amended.

59. Leachate treatment: “For the purpose of designing the leachate treatment plant (LTP plant), the quality of leachate at the Vinča landfill is analyzed”. When was the analysis performed? What methodology was applied?

Chapter 3, subchapter 6a. Leachate treatment and Chapter 5, subchapter 5.3 Water have been amended.

60. “The plant is designed to operate at temperatures ranging from -5°C to 25°C.” Why was the plant designed in this manner? What is the number of days seeing the air temperature exceeding 25°C or falling under -5°C? The attention should be paid to the comments relating to the Chapter “Air temperature” which seems to be missing a clear and disaggregated overview of average temperatures which would provide an insight into the trend of average temperature increase in Belgrade and Serbia.

These temperatures represent the limit values for optimal continuous automatic operation: if a temperature is outside this range, then the Operator must intervene to adjust operating parameters and maintain guaranteed discharge levels (for example, additional recirculation of leachate, etc.).

61. “In case of a temperature outside this range, reaching the guaranteed emission standards is likely to fail.” Specify the percentage of efficiency decrease in leachate treatment expected and specify the substances it applies to. Is this deviation from the prescribed values of water quality discharged into the receiving body a consequence of the selected treatment technology solely, or is it related to the quality of leachate from the existing non-sanitary landfill?

Leachate has its characteristic / composite composition values. On the other hand, the EIA study also presents the results of leachate analysis. The combination of empirical data and the results of performed analysis provides sufficient information to design lagoons and choose processing technology. Please see the EIA studies, Chapter 3.1, section 6a. LTP.

62. Quantity of generated leachate: Table 16. Leachate quantity generated on the landfill (source: PD Technology Design, Delta Inženjering 2018): Provide valid data from PD 2019. Does this leachate quantity include leachate from the existing landfill body?

The design has been defined on the basis of well-analyzed and predicted values, including projections for leachate generation from the New and existing landfill starting from 2020, i.e. the start of SVO.

63. “The leachate treatment plant shall only operate for a period of five years, to be followed by transporting all leachate to the EfW plant (not the subject of this project).”

Chapter 3.1 and subchapter 6a have been amended.

64. What is the schedule proposed for rehabilitation of the existing non-sanitary landfill? Where does leachate from the existing non-sanitary landfill body go upon expiration of a 5-year period? Is it re-pumped onto the upper platform (as stated on page 111) or to the EfW plant? Will the EfW plant be using non-treated leachate? How is it possible to have this to be the subject of another study, when it is clear that after 5 years, it will not be possible to abort the technological process without using the plants freely left out from this IA?

Chapter 3.1, subchapter 6a has been corrected, by supplementing the text with an explanation to make it easier to understand.

65. The study prepared by the project developer for EBRD loan approval states as follows: “The leachate treatment plant has been designed to accept the maximum load of leachate generated at the landfills (this maximum is generated in the first phase of the project, during old landfill rehabilitation). After several years, following treatment of leachate reserves within

the old landfill to the greatest extent, the LTP (leachate treatment plant) will accept external leachate in order to recommend the state-of-the-art treatment technology in the LTP to external users". Did the project developer change his mind in terms of technological solutions within the Vinča complex?

Chapter 3.1, subchapter 6a has been corrected.

66. "The pumping station at the lower lagoon is designed to transport collected leachate to the EfW plant after closing of the leachate water treatment plant''. What about the upper lagoon?

In the area of the upper platform, there is a pumping station designed to pump the leachate to the EfW for APC residue process - graphic illustration Figure 64 of the Study.

67. Construction of the retaining structure. Explain the abbreviation PZI in "PZI for remediation of the landfill landslide and stabilization of the part of the Vinča landfill, Book 3, Hidrozavod DTD, 2018)". If the abbreviation means a Construction Design (*Projekat za izvođenje - PZI*), explain what data was used to elaborate this design in 2018, having in mind the date of issue of the Location Requirements for the execution of these works and the procedure for undertaking the Environmental Impact Assessment Study.

As answer to this comment, please see the Regulation on the Establishment of a State Recovery Program in the Emergency Landslide Remediation Procedure in the City of Belgrade, part of the territory of the Municipality of Grocka caused by floods in May and June 2018, attached to the Study.

68. Greening of areas: "Landscape Design (Source: PD Book 9 Landscape Design - Protective green belt, landscaping, fencing, Energoprojekt Hidroinženjering, May 2019) proposes to form a protective green belt composed of different types of trees and shrubs along the interior fence side of the complex, 20 m in width, except to the right of the entrance in the length of 630 m, to be 10m in width due to technical conditions". What conditions are the reason for reduced width of the protective green belt? Explain the reason for having a 13m wide protective green belt on the border between KP 958/1 and 939/4 and 0m wide green belt on the border between KP 963/2 and 3319.

This part of the Green area is next to the plot KP6-2 for which we already have a green belt. So these two plots form a unique green belt, minimum 20 m in width, and in some parts it goes up to 26 m. According to the Detailed Regulation Plan, the boundary of the complex and the building plot has been completed and determined before we start with the design. Thus, URBEL defined the green belt, roads, building lots of new landfills.

69. Protective green belt: Description of the protective green belt Type B does not correspond to the requirements set out in the Detailed Regulation Plan of "Vinča" Sanitary Landfill. Reduced minimum protective green belt width to 20m is not permitted in the CDW zone, as stated in the IA and proposed in PD Landscape Design, but, as an exception to the rule, exclusively in the retaining structure zone due to the terrain configuration and the lower platform zone where the lagoon for leachate, the lagoon for rainwater and LTP have been proposed, in both cases, due to the development of internal roads, and with recommendation that on both sides of roads formed in such a manner should be formed new protective green belts covering a total width of 20m.

As explained in comment 121, in the zone of CDW (construction waste landfill), minimum width of 20m, at some parts even 26m, of green belt is planned.

70. Overview of types and quantities of required energy and fuels, water and raw materials, Water supply: "The amount of water which PUC Belgrade Waterworks and Sewerage is able to provide for the municipal waste landfill complex in Vinča is 24 l/s (filling at night, between 10 p.m. and 6 a.m.)." The Detailed Regulation Plan of "Vinča" Sanitary Landfill states that the current water supply system capacity is not sufficient to satisfy the demands of the complex, so it shall be necessary to construct new infrastructure (pumping station), about which there is no information in the IA. Explain why filling is performed at night, between 10 p.m. and 6 a.m., and what happens in emergency situations when it is necessary to have water in this particular period, to extinguish a fire, for example.

In the proposed Vinča landfill complex, fire water tanks are proposed. We have fire water tanks on the EfW site and on the landfill. According to the EfW requirement, it is necessary to ensure that 2k685m^3 is filled with water within 36 hours, due to the standard. In order to avoid jeopardizing the water supply of neighboring consumers, tanks will be filled during two nights in the period between 10 p.m. and 6 a.m., that is, twice for eight hours with a water volume of 24 l/s, but only at the beginning of the start of the plant.

PUC Belgrade Waterworks and Sewerage's analysis showed that the global water supply at night can reach nearly 40 l/s, so during these two nights of filling the tanks, the Waste Landfill Operator will all unnecessary consumption (for example, part of the landfill in the complex will have no demand for water during the night). The worst-case scenario, which was analyzed as a potential one that could occur is a fire at the Belgrade District Heating Plant at the time of filling the tanks, and for this scenario, the consumption is 37.58 l/s (less than the expected maximum during the night).

71. Overview of types and quantities of released gases, water, and other liquid and gaseous waste substances, observed by technological unit and technology of their treatment. Considering the fact that over time the solidified mass of waste from the EfW will disintegrate, it is clear that the proposed solidification does not guarantee permanent prevention of dangerous substances penetration. Please explain this process and explain what types of compounds will be released.

The answer to this comment is part of the comment no. 58.

72. Also, please explain how the disposal of hazardous waste is in line with the EU Landfill Directive which does not allow the disposal of hazardous waste on non-hazardous waste landfills.

The answer to this comment is part of the comment no. 58.

73. Is there any analysis of climate footprint of the cement used in such a way, performed for the purposes of the ESIA?

The answer to this comment is part of the comment no.96.

74. Overview of compliance of the proposed and designed solutions with reference BAT document: Does Chapter 3.2 also address the process of rehabilitation and remediation of the existing non-sanitary landfill?

No, this chapter does not address the process of rehabilitation and remediation of the existing non-sanitary landfill.

75. Supplement with an analysis of compliance with the criteria and plans for reaching expected recycling values set forth by EU Directives 2008/98/EC and 2018/851. The Member States shall achieve following municipal waste recycling targets: 55% by 2025, 60% by 2030 and 656% by 2035. Considering the fact that Serbia plans to become a member of the EU, these targets will be also obligatory for RS; therefore, it is necessary to supplement this chapter and other parts of the IA with an analysis of total waste amount annually collected in the territory of Belgrade, with the description of the existing waste management mechanism applied in the territory of Belgrade, and an overview of the waste composition, quantities and methods in which waste is separated, sorted, recycled and used at the moment when the contractual obligations start.

The National Waste Management Strategy 2010-2019 (2010) and Proposal of Waste Management Strategy 2015-2030 (planned for 2016) establish the framework for final waste reduction and sustainable waste management. The Proposal of Waste Management Strategy 2015-2030 proposes following targets:

- *Reduce disposal of biodegradable waste at landfills by 25% by 2022, 50% by 2026 and 65% by 2030;*
- *Achieve at least 60% of reuse and 55% of recycling of packaging waste by 2025;*
- *Achieve at least 50% of recycling of municipal waste by 2030;*

- *Improve the specific waste streams management system (waste tires, used batteries, waste oils, waste vehicles) to achieve 4 kg per capita of separately collected waste vehicles by 2019 and at least 45% of batteries and accumulators by 2016.*

The Energy-from-waste plant is planned for 340.000 t/y, covering only 67% of projected residual waste or compared to a total solid waste quantity of 750.000 t/g, including waste to be recycled and composted, only 45% of the projected waste in 13 municipalities covered by the project for Belgrade. As there is no plan for other waste in power plants in Serbia at this moment, this proposed project does not hinder the capability for Serbia to achieve the above mentioned target of 50%. More importantly, achieving this target highly depends on the separate collection system which is out of the project scope. Achieving the collection rate will be subject to establishing an adequate collection system by the municipality which is out of the scope of this project and these EIA studies. According to the PPP Contract, there is no concept of minimum guaranteed tonnage to be delivered by the City.
The City of Belgrade is currently conducting a procedure for selecting a consultant to develop Local Waste Management Plan 2021-2030, in order to continue establishing the system and organization for managing municipal, inert and non-hazardous waste in a manner which ensure minimum risks and dangers for the environment and conditions for waste generation prevention, reuse and recycling of waste, use of useful properties of waste, disposal, if other adequate solution does not exist, as well as raising awareness about waste management.
In addition, the Ministry of Environmental Protection is currently developing a draft National Waste Management Strategy 2020-2029.
On the other hand, the relevant project is not in collision with the National Waste Management Strategy nor principles of waste hierarchy. Primary selection and secondary separation of municipal solid waste is under competence of local government. The project and the Environmental Impact Assessment Study do not state the need for importing municipal or any other waste.

Please see Chapter 3.2 of the EIA Study for the landfill:
Waste Management Hierarchy (Waste Management Law):
- *Prevention*
- *Preparing for reuse*
- *Recycling*
- *Other recovery operations (recovery for energy production, etc.);*
- *Disposal.*

Prevention of waste generation in the City of Belgrade is performed through activities defined at the national level, and is reflected in, primarily, through applying the principle of cleaner production concept, circular economy, defining by-products, end-of-waste status, etc. Intense efforts have been made to raise the population awareness about the importance of prevention for over 10 years.
Preparing for reuse and recycling starts with the relatively well-organized primary selection system functioning in the City of Belgrade. Primary selected secondary raw materials are collected through a wide network of secured and placed collection dumpsters in the territory of the City of Belgrade. Primary selected secondary raw materials are transported to existing municipal waste collection centers where secondary separation is carried out at the separation line (Ada Huja, New Belgrade).
Decision of the Mayor of Belgrade no. 501-4180/16-G dated 17 June 2016 determined locations for establishing new waste collection centers - recycling centers and transfer stations. The City of Belgrade budget for 2019 allocated funds for the procurement of equipment and equipping of two more recycling centers with a separation line and other necessary equipment. Recycling centers also collect special types of waste pursuant to the Law.
The 2019 Budget also provided for the procurement of additional dumpsters for the separate municipal waste collection system (paper, plastic, metal, glass, mixed municipal waste), additional underground dumpsters, numerous machinery and vehicles for waste collection and collection of sorted secondary raw materials, roll-off dumpsters, baling presses with a capacity of 100 t, with the aim of upgrading the existing system and expanding the coverage of the territory with a waste collection service.

Procurement contracts are made between suppliers and PUC "Čistoća". This construction project of new landfill and other facilities also proposes the installation of a construction waste treatment line.
Other recovery operations (energy recovery from waste, etc.). The landfill is to be built at the site where the existing landfill is already located at which the entire amount of collected mixed municipal waste is disposed. Instead of such a solution, the project involves a modern energy-from-waste plant, as well as a biogas plant using landfill gas from the body of existing and new mixed municipal waste landfill.
In the future, in the City of Belgrade, only amount of mixed municipal waste remained after primary and secondary waste selection, recovery and treatment at construction waste treatment plants, energy recovery from waste and energy recovery from landfill gas, as well as after separation of green waste from the maintenance of green spaces and cutting down of trees done by PUC "Zelenilo" at special locations, will be disposed.

76. Supplement with an analysis of compliance with the criteria for disposal of (non) hazardous waste set forth under the EU Landfill Directive which DOES NOT ALLOW the disposal of hazardous waste at non-hazardous waste landfills. This is particularly true and applicable to the analysis of stabilization of residues from the EfW using solidification method which is only a temporary solution. Considering the fact that over time the solidified mass will disintegrate, it is clear that the proposed solidification will not lead to permanent prevention of dangerous substances penetration, and that hazardous waste will be deposited at the Vinča landfill contrary to the regulations in place in RS and EU which strictly prohibit that.

The answer to the comment is part of the comment no. 58.

77. Table BAT, point 4: "Plan to reduce the quantity of biodegradable waste which is landfilled is the obligation of the City of Belgrade and is part of a separate project implemented in cooperation with PUC Zelenilo". How do we know that the requirement is "partially" fulfilled, unless we are provided with some evidence? This IA must demonstrate and validate that all activities in the Vinča complex meet the prescribed standards in the field of environmental protection. This is a must, regardless of the distribution of responsibilities and commitments set out under commercial contracts between the project developer and other entities.

Baseline data on the estimated quantity of waste generated and collected in the relevant territory is provided as part of the tendering documentation and defined within a study prepared by Fichtner.

78. Table BAT, point 5: What are the "clearly specified measures for waste treatment that cannot be accepted to the site" which, as claimed by the project developer, have been prescribed in such a manner to satisfy the criteria and procedures for waste acceptance in accordance with Annex II to the Waste Directive (Annex II of the Landfill Directive and Council Decision 2003/33/EC)? What is happening with waste that cannot be accepted to the site? This is particularly important because there are no plants for disposal of hazardous waste in Serbia. In addition, the facilities proposed in the Vinča complex must ensure full compliance with Annex I: "Plants for disposal of waste by incineration or chemical treatment, as set forth under Annex I to the Directive 2008/98/EC under the title D9, Installations for disposal of non-hazardous waste, with a capacity exceeding 100 tons on a daily basis".
    …and in accordance with Annex II to the Waste Directive (Annex II of the Landfill Directive and Council Decision 2003/33/EC)"

The answers to this comment are given in Chapter 3.1. and subchapter 3a, particularly the description of the quarantine area and procedure.

78. The facilities proposed in the Vinča complex must ensure full compliance with Annex I: "Plants for disposal of waste by incineration or chemical treatment, as set forth under Annex I to the Directive 2008/98/EC under the title D9, Installations for disposal of non-hazardous waste, with a capacity exceeding 100 tons on a daily basis".

The answers to this comment are given in Chapter 3.1. and subchapter 3a, particularly the description of the quarantine area and procedure.

79. Table BAT, point 8. Does it relate to the closure of the existing non-sanitary landfill?

The table does not relate to the closure of the existing non-sanitary landfill. It will be resolved in accordance with the Existing Landfill Remediation Project which the Ministry approved in July 2019. Landfill remediation is not subject to an environmental impact assessment according to RS legislation.

80. Table BAT, point 9: Instead of advertising the proposed facilities, provide precise information on the quantity of waste generated in Belgrade on an annual basis (today and over the estimated period of operation of the proposed facilities and filling up of proposed cells of the new landfill) and provide the information about its composition. Also, provide precise information on the quantity of waste subject to primary and secondary separation. Without this information, it is impossible to claim that this criterion may be considered fulfilled.

The answer to this comment is given in previous comments.

81. Table BAT, point 10: Are works on the existing non-sanitary landfill part of this IA or not? And why?

The answer to this comment is given in previous comments.

82. Table BAT, point 11: Provide precise information on the quantity of waste generated in Belgrade on an annual basis (today and over the estimated period of operation of the proposed facilities and filling up of proposed cells of the new landfill) and provide information on the quantity of waste subject to primary and secondary separation.

The answer to this comment is given in previous comments.

83. Table BAT, point 12: Table BAT, point 11: Provide precise information on the quantity of waste generated in Belgrade on an annual basis (today and over the estimated period of operation of the proposed facilities and filling up of proposed cells of the new landfill) and provide information on the quantity of waste subject to primary and secondary separation, and what quantity of waste will be incinerated and what quantity will be deposited and why.

The answer to this comment is given in previous comments.

84. Table BAT, Point 13.1: What is the quantity of green waste to be treated at a special location by PC Zelenilo? What is the proportion of this material in the total quantity of waste collected in the territory of Belgrade and which is intended for treatment and disposal in the Vinča complex? Specify the reason why the impact of the installation for disposal of green waste (including sorting and treatment of secondary raw materials) is not examined by this IA, although they are part of the technological process of the waste management covered under this IA?

This is not a feasibility study of Belgrade's waste management system, nor a strategic study of the waste management plan, or anything like that. A study is undertaken for a precisely defined project based on a Preliminary Design (PD) developed in accordance with specially issued location requirements for the elaboration of technical documentation and connection for a specific Schematic Design, issued by the competent authorities (Article 12 of the Law on Environmental Impact Assessment, ".the request referred to in paragraph 2 of this Article shall be enclosed with the following documentation: 2) preliminary design, i.e. excerpt from preliminary design ... 4) requirements and approvals of other competent authorities and organizations obtained in accordance with a separate law ..") .

85. Table BAT, point 14: Explain the difference between the specified values and the values prescribed by the RS regulations. Explain the reason why the specified BAT values are recommended, not binding and specify the period of plant operation to which such an interpretation applies.

This is defined by the cited reference documents in the second column of the table.

86. Table BAT, point 16: Specify the method for measurement of other substances whose limit values are prescribed under the Reference document on best available techniques (BAT)? Considering the fact that there are no laboratories in Serbia where it is possible to

measure dioxin and furan emissions, this means that it will not be possible to perform necessary monitoring.

Monitoring of dioxin and furan concentrations shall be carried out in accordance with legally defined obligations, using a standard sampling and analysis procedure. At the moment, there are laboratories in Serbia that are accredited for sampling but not for determining the concentration of these compounds in gases. According to regular practice in Serbia and EU, samples will be taken by accredited laboratories and then, in a standardized manner, sent to an accredited laboratory abroad to perform analysis and provide an official report (e.g. representatives of the cement industry in Serbia using waste as an alternative fuel also implement this practice). This situation is not uncommon.
Also, this does not mean that some of the laboratories in Serbia will not be accredited in the near future. Laboratories undergo accreditation procedure every year, and the scope of accreditation is not always the same.

87. Table BAT, point 17.2: The acceptance and disposal of hazardous waste must be part of this IA, rather than being part of the "Plant Operation Plan", which means that this requirement is not "partially" fulfilled, but it is not fulfilled at all.

The statement is false. Waste acceptance, control measures and procedures for its handling and placing in the quarantine area are described in detail under Chapter 3.1.

88. Table BAT, point 17.6: Although there is a plan for developing the protective belt, it is not in compliance with valid regulations. Please provide an answer in line with the comment on the content of Chapter 3.1.1.

The green belt was designed based on the Detailed Regulation Plan. Please see the DRP and attached Requirements issued by the official institutions.

89. Table BAT, point 18: Coordinate the data on the distance of the nearest settlement in relation to the comment on the content of Chapters 2, 2.7 and 2.10.

The answer to this comment is given in previous comments.

90. Table BAT, point 18.2: Considering the fact that "the project does not propose any pre-treatment of waste to be landfilled", provide explanation how it will be guaranteed that no hazardous waste will be deposited, given the composition of municipal waste specified on page 73 of the IA, which shows that 0.4% of waste is hazardous waste, and in relation to Article 43 of the Law on Waste Management, which considers municipal waste mixed with hazardous waste, if there is no separation, as hazardous waste.

The answer to this comment is given in previous comments.

91. Table BAT, point 22: Provide additional information on wastewater quality in relation to the comment on the content of Chapter 3.1. Leachate treatment.

Chapter 3.1 of the Study has been amended.

92. Table BAT, point 24: It states that "risks of discharging wastewater into groundwater are minimized by the project proposing controlled collection, transport and treatment from the entire landfill complex", despite the fact that this IA does not address the rehabilitation and recultivation of the existing non-sanitary landfill. The description of this procedure would show that it is impossible to perform complete rehabilitation of the existing landfill since it is sited in the basin of the Ošljanski creek and it was estimated that it is not possible to place a drainage channel in the creek bottom, although this would be the only safe way to collect leachate (Detailed Regulation Plan of Vinča Sanitary Landfill). It is therefore absolutely impossible to claim that no direct discharge of leachate into groundwater is likely to occur, because this discharge occurs continuously.

The statement is false. Please see Chapter 3, subchapter 6 Lower platform. The IA relates to the project of new landfill and accompanying facilities.

93. Table BAT, point 33: If this waste is not disposed at the Vinča complex, what happens with it? Is there a hazardous waste disposal and treatment landfill in Belgrade or Serbia and what type?

The answer to this comment is given in previous comments.

94. Table BAT, point 34: Explain the impact of noise caused by delivery vehicles and other machinery related to regular operation of the proposed facilities.

Noise effects of the project were calculated by 3D acoustic model (CadnaA software version 2018). To define the noise level caused by the project, all data on noise generated by the equipment is defined. 3D modeling is applied. It integrates the following parameters:

- *Topography,*
- *Buildings,*
- *Noise sources,*
- *Obstacles (screens, embankments, ...)*

As regards noise sources, the impact of the noise caused by delivery vehicles has been fully taken into account and carefully modeled within noise modeling.
Traffic data is divided in three periods to repeat the expected delivery patterns (7:00 am - 2:00 pm / 2:00 pm - 9:00 pm / 9:00 pm - 7:00 am)
The modeling was carried out in 2 scenarios:
- Scenario 1: Provisional phase (2020 – the end of 2021)
- Scenario 2: Operational phase (the end of 2021 to the end)
The results of noise modeling are presented in the Study.

95. 4.0 Overview of main alternatives considered by the project developer: Here as well, the project developer cannot decide whether the subject of this IA is the construction of the new landfill or all facilities in the Vinča complex. In any case, the consideration of alternative solutions cannot come down exclusively to cost-effectiveness of applied technologies for the project developer, but to an analysis and finding the solution which causes the least adverse effects on the environment. The competitive dialog process described demonstrates that the selection of the technology applied was conditioned only by the financial aspect. Further on, the described procedure clearly indicates that for the Vinča site, which is exclusive subject of this IA, only one solution was considered, namely, direct waste incineration with additional disposal of non-treated waste. As we emphasized at the phase of scoping of the Environmental Impact Assessment Study for the EfW plant, during the decision-making process it shall be necessary to take into account non-incineration alternatives, as proposed by the principle of waste management hierarchy. These alternatives include the program to reduce waste generation, waste separation in households, recycling, composting and disposal of only stabilized residues. Supplement the Chapter with the above information on alternative solutions considered by the project developer, regarding waste treatment at the Vinča site.

The answer to this comment is part of the answer for the comment no. 34.

96. OVERVIEW OF THE STATE OF THE ENVIRONMENT IN AND AROUND THE SITE Overview of the following factors is missing:
    - Relief;
    - Geological characteristics;
    - Hydrological characteristics;
    - Hydrogeological characteristics;
    - Pedology;
    - Protected natural areas;
    - Climate characteristics;
    - Climate change;
    - Odor.

The statement is false; this data is in the Study.

97. We particularly note that it is unbelievable and extremely irresponsible that an overview of geological characteristics is missing in spite of the fact that the Detailed Regulation Plan of

"Vinča" Sanitary Landfill prescribes as an obligation to carry out detailed geological investigations in accordance with the Law on Mining and Geological Explorations and corresponding Rulebooks, for the proposed landfill and facilities within the DRP boundaries, as well as the significance of hydrogeological characteristics for prescribing the measures for environmental protection from potentially highly polluted leachate percolating through the existing non-sanitary landfill body into groundwater and discharged into the Danube river.

The answer to this comment is part of the answers for the previous comments regarding geological and hydrogeological characteristics of the terrain.

98. OVERVIEW OF THE STATE OF THE ENVIRONMENT IN AND AROUND THE SITE. Supplement the IA with additional information on property and legal status of the land on which the project is proposed to be built. How many people will be affected by land acquisition for Vinča complex expansion purposes?

Not the subject of the Study.

99. Specify the informal settlement referred to in Chapter 5.1? Where is it sited? How many inhabitants is living in it? What is the status of the settlement on the day of contract signing, September 2017 and what is the status on the day of IA presentation for public debate in June 2019?

All families which meet the requirements laid down by the Law on Housing and Building Maintenance were provided adequate housing support and placed in already built apartments of the City of Belgrade in accordance with the Resettlement Plan for households living in the informal settlement located at the landfill site, and for income restoration of collectors of secondary raw materials (waste pickers) at the Vinča landfill.

To individuals not having personal documents, the City of Belgrade provided assistance in obtaining them. Persons older than 16 years were provided assistance in obtaining an identity card. Parents were assisted in obtaining birth certificates for children below 16 years of age.

Prior to the resettlement, all children below 14 years of age were enrolled in preparatory preschool program and primary school, in accordance with mandatory preschool and primary education as defined by positive regulations of RS.

School attendance is regularly monitored in cooperation with school principals, teachers and the Secretariat for Education.

After resettlement, all medical records of the persons covered by the project were transferred to primary health care centers at new locations. Those not having medical records were provided assistance in registering and obtaining records in primary health care centers.

Families are work-engaged at the Vinča landfill as collectors, they pay costs of housing from their own income. Prior to the resettlement, families were informed on costs of using apartments, that is, households were presented that they will be obliged to pay rent (unless they move to their own apartment or house) and costs of bills, but also that the City will help them through subsidies to settle these costs, and that the City will help them in obtaining personal documents, enrolling children in schools, healthcare, social protection and finding a job:

The City of Belgrade, the city of Šabac and the municipality of Vladimirovci will provide assistance the persons covered by this project in restoring and improving their income through the following measures:

- *Seasonal job offers;*
- *Job offers in city utility companies;*
- *Job offers through public work programmes:*
- *Job offers in cooperation with the NES (development and implementation of individual employment plans, job search training, and courses of retraining and adult education, job opportunities available, mediation in finding employment, entrepreneurship incentive and development services, special programs for individuals belonging to vulnerable and harder-to-employ groups);*

- *Offering assistance in employment and self-employment within available programs and projects of NGOs and other organizations (e.g. IPA 2016 EU Support for Roma Inclusion – Strengthening local communities for Roma inclusion, funded by the European Union and implemented by the Permanent Conference of Towns and Municipalities, in cooperation with local governments throughout Serbia);*
- *Offering adult education and craft training courses;*
- *Offering jobs during the construction phase of the project, at the Vinča landfill, and later during the operational phase of the new landfill;*
- *Offering jobs involving collection and sorting of secondary raw materials at other locations where PUC Gradska Čistoća operates (e.g. at sites of future recycling centers)*

Since the families were relocated from the informal settlement next to the Vinča landfill in September 2018, the Working Group has been monitoring the implementation of the Resettlement Plan for at least two years after resettlement in cooperation with all other organizational units involved in the implementation of the Resettlement Plan.

100. The latest data on the settlement dates back to 2016?! Considering the fact that the Law on Housing and Maintenance of Residential Buildings entered into force on 31 December 2016 and that the population census of the Vinča settlement was finalized 6 months before the Law was adopted, it is obvious that the RAP was developed contrary to this law. The Law on Housing and Maintenance of Buildings, Article 81 stipulates the obligation of the entity carrying out the resettlement to consult and cooperate with human right protection organizations and persons affected by the resettlement in the process of preparing the Decision on the necessity of resettlement with resettlement plan. In addition, the conclusions from the consultations performed are mandatory part of the Decision on the necessity of resettlement. The authority which adopted this Decision and the resettlement plan neither consulted the community nor collaborated with organizations dealing with human right protection. Finally, the Decision does not contain the mandatory element prescribed by the Law, therefore, in this respect, it shall be deemed illegal. The Law on Housing and Maintenance of Residential Buildings entered into force on 31 December 2016, before the last census of families inhabiting the informal settlement. Bearing this in mind, in order to ensure full compliance of the resettlement process with the law, it was necessary to conduct a new census following the entry into force of the law.

The answer to this comment is part of the answer for the previous comment.

101. There are at least 4 families living in the settlement for many years, but not included in the final list of the inhabitants dated 8 June 2016. Given that the practice of the European Court of Human Rights and international standards guarantee the right to adequate housing and protection from forced eviction, as well as the right to the provision of alternative accommodation to any person inhabiting the particular place considered to be his/her home, it is clear that the obligation includes provision of alternative accommodation also to those households settled after the completion of the last census of the inhabitants as well, if that particular place of living could be considered their home. Please explain the manner in which the remaining families from the Vinča complex were taken care of.

The answer to this comment is part of the answer for the previous comment.

102. Supplement the IA with additional information on the course of - Individual consultations with property owners and negotiations on the activities to be undertaken to help them; - Presentation and signing of the contract; - Consultation meetings with local communities where the families are to be resettled; - The commencement date of the resettlement and the planned transport of the families and their belongings (families will be informed about the exact date of the resettlement at least one week before the scheduled date).

The answer to this comment is part of the answer for the comment no. 99.

103. Supplement the IA with additional information on the exact date of the resettlement. Supplement with information on the locations where the families have been resettled, with a clear indication of the apartment size in relation to the number of family members resettled into. Supplement with information on apartment characteristics, with regard to power and water availability on the day of resettlement. Supplement with information on the contracts guaranteed the families the right to housing at the time of the resettlement, i.e. specify dates of handing over the contracts to the families. Supplement with an overview of rental and maintenance costs in relation to the income of each individual family resettled. Supplement with the provisions of the law governing the resettlement procedure.

The answer to this comment is part of the answer for the comment no. 99

104. How many workers in total are employed at the Vinča complex on secondary raw material collection? Surveys show that for up to as many as 12,000 people the only monthly income comes from collecting secondary raw materials. How will the project implementation affect these people and how will this group be consulted about them?

105. Data is provided as of 2016 inclusive. Data on the "regular state and local air quality monitoring (SEPA)" for 2017, 2018, and the first half of 2019 is missing;

The mentioned data was not publicly available.

106. More precise layout showing locations of metering stations, in particular those sited in the area of Belgrade, is missing; There is no indication which of these stations that were active during the measurement in 2016, to which the measured values refer; which of them actively collected data during 2017 and which of them are active today;

The answer to this comment is given in Chapter 5.2 of the Study.

107. How many of these measuring stations measure the presence of PM2.5?

The answer to this comment is given in Chapter 5.2 of the Study.

108. Data from how many of these measuring stations for the presence of PM2.5 is used for compiling an annual air quality report?

Not the subject of the Study.

109. Specify the method used for collecting data from large polluters and the frequency of their publication.

Not the subject of the Study.

110. Is the collection of air quality data in Serbia and Belgrade in compliance with the local and EU regulations? Specify the regulations.

Not the subject of the Study.

111. In the 2010-2016 period, Belgrade experienced highly polluted air, of III category, mostly due to an increased concentration of PM10 and occasionally due to an increased NO2 concentration, as was the case in 2016. It is unacceptable to add a new source of pollution, such as an incineration unit, when it is obvious that the air quality in Belgrade is at a very low level! Additional monitoring of air quality in the period of great fire in June 2017:

Key data is missing:

Measurement of air quality at additional 4 stations started as late as 17 days after the outbreak of fire at the Vinča landfill, thus indicating the unpreparedness of the competent institutions to adequately protect the health of the citizens of Belgrade and Serbia.

Free interpretation. Not relevant for the Study.

112. New measuring points for monitoring air quality during the fire (source: SEPA) show that 3 out of 4 newly installed measuring stations were not located on the path of smoke coming from the Vinča landfill for weeks.

Free interpretation. Not relevant for the Study.

113. Measurement of air quality during the fire in Vinča was performed for compounds the presence of which is expected in the air, but not for compounds released under conditions of waste incineration (highly persistent organic pollutants, including carcinogens - dioxins and furans).

The Study shows only available data.

114. Neither Serbia nor Belgrade has a laboratory capable of performing an analysis of the concentration of highly carcinogenic compounds, dioxins and furans, in the air. The emission of these compounds is an integral part of the waste incineration process, both during spontaneous firing (fire at the Vinča landfill in June 2017) and during waste incineration in installations such as the plant proposed under this project.

The answers to this comment are part of the comments no. 46 and 142.

115. Results of the baseline survey for this project:

Two types of monitoring (continuous and passive) were conducted for the purpose of baseline survey during winter months (January and February 2018) while the third, during the course of 7 days, was conducted in early April 2017. It is necessary to perform measurements during summer period as well, in view of the fact that higher temperatures affect the level of air dilution and are likely to result in increased concentrations of pollutants.
In the part showing results of baseline survey for this project, it is beyond any reasonable understanding to accept the explanation stating that no comparative analysis of measured presence of polycyclic aromatic hydrocarbons (BTEX), PM10, NO2, SO2, Pb was performed. In case there was not enough time to perform all the analyses necessary for assessing the impact of the project on the environment, it means that it's too early to undertake the IA.

Monitoring of (BTEX), PM10, NO_2, SO_2, Pb was carried out (see Chapter 5.2):
- some by continuous monitoring (SO_2, NO_2, PM10, ammonia, hydrogen sulfide, hydrogen chloride, hydrogen fluoride, heavy metals, volatile aromatic hydrocarbons (BTEX);
- some through passive sampling (PM10, HF, NO_2, SO_2, HCL, Hg, BTEX and heavy metals).

116. Why there is no data on concentration of PM2.5 suspended particles?

There is no reliable method to passively sample PM 2.5, and a portable PM 2.5 active sampler was not available in Serbia at the time of conducting the baseline survey. It was chosen to use very conservative assumptions for PM 2.5 parameters for the baseline state and emissions, and modeling of air quality is also conservative for this parameter.

117. Supplement the IA with a quality analysis of potable water from the Belgrade water supply system. Available analyses show that as many as 4% of water samples from the water supply network in Vinča is bacteriologically unsafe.

All available data is presented.

118. For the purpose of undertaking the environmental impact assessment study for the construction project of new landfill and EfW plant". Which Study is this? When was it undertaken and which decision determined its scope?

Taken out of context, the sentence reads "For the purpose of conducting environmental impact assessment studies for the construction projects of new landfill and EfW plant, with the aim of establishing the baseline state of surface water quality at wider location prior to commencement of construction works on rehabilitation of the existing landfill, construction of the new landfill and EfW plant, sampling and analysis of water samples were conducted from 7 locations in total during March and June 2018: 1. and 2. Ošljanski creek, 3. Ošljanska pond (small), 4. Ošljanska pond (large), 5. Landfill leachate, 6. Dunav River (downstream) and 7. Danube River (upstream)". Plural "projects" was mentioned and none of the documents was listed precisely. Namely, the baseline state of environmental factors was conducted for the purpose of undertaking this study, the study for EfW plant and ESIA study.

119. "…sampling and analysis of water samples from 7 locations in total were conducted during March 2018". The description is inaccurate! Table 25 shows that the sampling was performed in the described way (in March and June 2018) at 2 locations only. At the remaining 5 locations, the sampling was performed only once (either in March or in June).

It states "from 7 locations IN TOTAL during March and June", and View of surface water sampling site in March and June 2018 is given in Figure 89.

120. Results of baseline survey for the purpose of this project, Physical-chemical analysis of surface water: Due to the high precipitation that could have dissolved the samples (as noted in the IA) the measurements of leachate quality should be repeated at all measuring points.

Leachate quality is monitored regularly during the entire year, twice a month since recently. It is very difficult to correlate rainfall and leachate concentration. However, this monitoring of the leachate confirmed the adequacy of the LTP design for the quality of raw leachate.

121. Physical-chemical analysis of groundwater: Drawing showing locations of piezometers is missing. Were the measurements performed only in the narrow zone or they covered the wider zone around the Vinča complex? Table showing the overview of measurement results with clearly specified conclusions on groundwater quality is missing. Document "Report on Groundwater Quality" developed in April 2018 by "Energoprojekt Hidroinzenjering", is not attached to the IA.

The location of piezometer holes and other excavated boreholes and pits, Geological-geotechnical investigations for design and construction of new landfill in the Vinča municipal waste landfill complex, Energoprojekt Niskogradnia, 2017, is shown in Figure 4.

122. Biological analysis of surface water in the project zone: "The analysis of state of aquatic ecosystems was performed by an expert team of the Institute for Biological Research "Siniša Stanković" from Belgrade in early April and mid-June 2018." Table 26 shows that in June 2018 samples were taken only from SW3 and SW4 locations.

The question is not clear. The method and scope of research was specified in detail in the Study.

123. It is missing the explanation about two selected soil samples SS3 and SS6 which will be analyzed for the presence of polychlorinated dibenzodioxin (PCDDS) and polychlorinated dibenzofuran (PCDF). If the samples SS3 and SS6 correspond to the measuring points of Surface soil 3 and Surface soil 6, there is a need for an additional explanation why these two measuring points were selected to be tested for the presence of highly carcinogenic compounds in soil, as these two sampling points are the furthest from the existing landfill body, that is, the source of pollution.

A representative of Egis company, accredited for soil sampling, sampled soil at points SS3 and SS6* for the analysis on polychlorinated dibenzodioxins PCDDs and polychlorinated dibenzofurans PCDF, and the analysis was conducted by internationally accredited laboratory Alcontrol (now Sinlab). These points were selected based on logical reasoning that is was important to determine the concentration in soil which is the closest to agricultural land and on the path of dispersion in their direction. It is not logical to take samples next to the landfill body.*

124. EBRD's answer addressing the previous comments states that SS3 and SS6 were selected as sampling points due to their position with respect to prevailing winds and seclusion from roads and other activities, but it is still not clear why there was no sampling closer to the landfill. It seems to us that this is an avoidance of responsibility for measuring PCDD and PCDF, in particular after the great fire, given that incineration of waste in open fields is one of the major sources of PCDD and PCDF.

The answer to this question is part of the answer for the comment 192.

125. Compare the position of SS3 and SS6 with the prevailing winds map.

    Since it is stated that "the sampling was conducted on 29 March 2018 by "Anahem" laboratory from Belgrade, at 10 measuring points – 7 for soil and 3 for sediment. Samples were analyzed to establish physical-chemical and micro-biological parameters by the same laboratory, while

detection of asbestos, at 5 out of 10 points, was conducted by laboratory Institute “Mol” from Stara Pazova, who and within what investigation sampled polychlorinated dibenzodioxins and dibenzofurans on 15 March?

The answer to this question is part of the answer for the comment 192.

125. Designations in Tables 29 and 30 are not coordinated with designations of measuring points in the layout drawing, Table 31. The results of sediment analysis do not specify clearly the measuring point the presented results refer to. Data seems to be completely missing in Table 31 on the compounds analyzed from the sample SS5, sample SS9 and sample SS10.

It is about sediments and they are addressed in the part relating to to surface water and sediments.

126. Measurements were analyzed in accordance with the Regulation on the Program of Systematic Monitoring of Soil Quality via Indicators for Assessment of Soil Degradation Risk and Methodology for Creation of Remediation Programs, Annex 3 (“Official Gazette of the RS”, no. 88/10), which is invalid. Considering the fact that the Regulation on limit values for polluting, harmful and dangerous substances in soil (“Official Gazette of the RS”, no. 30/2018) was effective on the day of the adoption of the Detailed Regulation Plan of Vinča Sanitary Landfill, the adoption of the Strategic Environmental Impact Assessment of this DRP, and the publication of this IA document, it is necessary to ensure full compliance of the soil sample analysis with applicable legal provisions laying down the limit values for pollutants.

The Regulation on the Program of Systematic Monitoring of Soil Quality via Indicators for Assessment of Soil Degradation Risk and Methodology for Creation of Remediation Programs, Annex 3 (“Official Gazette of the RS”, no. 88/10) was repealed by the Regulation on the Program of Systematic Monitoring of Soil Quality via Indicators for Assessment of Soil Degradation Risk and Methodology for Creation of Remediation Programs (“Official Gazette of the RS”, no. 88/10 and 30/18), and the Regulation on limit values for polluting, harmful and dangerous substances in soil was adopted as late as 6 September 2019 (“Official Gazette of the RS”, No. 30/18 and 64/19).
Differences in limit values of these two, now three Regulations, do not exist. The changes adopted the following year relate to procedures.

127. “The measured concentrations of all parameters analyzed do not exceed the remediation values for dangerous and harmful substances in soil”.

The Environmental Impact Assessment Study developed for EBRD loan approval purposes demonstrates that the measured values of nickel in soil (location 2) are Ni=78 mg/kg. What is the reason the project developer decided to exclude the table showing the results of soil sampling for the purpose of this IA? Without the view of measurement results, it is impossible to verify the accuracy of the presented data.

Due to the size of the document and tables, the Report can be made available for access, and the Study only contains conclusions thereof.

128. Results of the baseline survey for this project: The following is missing: clarification for the selected noise measuring points, description of the exact location of the points, description of the surrounding of these points, the number of residential buildings or other affected structures in the surrounding or at the location of these points, as well as description of the measurement methodology applied, i.e. time and duration of measurement and instruments used. Table showing the measurement results is missing; it would more clearly present the obtained data in relation to the reference values.

Spatial view of measuring points for determining noise level in wider area of the Vinča landfill complex is given in Figure 95. The report of the City Public Health Institute can be made available for access.

129. Supplement Chapter “Structures, immovable cultural goods, archaeological sites and ambient units” with information on the archeological site of importance for RS “Belo brdo” (Decision no. 653/5 dated 10 November 1965, Cultural resource of exceptional importance,

Decision, “Official Journal of SRS”, no. 14/79). Show in the drawing the exact position of this archeological site and the project boundary, in order to undoubtedly establish that works on the project implementation will not have affect this site.

See the attached Requirements issued by the competent authority with attachment and Chapters 2.8 and 5.7.

130. Also, supplement the corresponding chapter of the IA with information on recorded landslides in and around the project site in order to undoubtedly establish that works on the project implementation shall not cause the activation of landslide which could consequently affect the archeological site of exceptional importance for RS "Belo brdo".

The answer to this comment is given in Chapter 7.1.

131. “For the purpose of testing and recording of potential new, so far unexplored archeological remains in the exploration are, within the Vinča landfill zone, in the period from 9 February 2017 to 5 March 2017, geophysical explorations were conducted by Tehnohidrosfera llc, Beočin”.

Based on which permit the explorations were conducted? Were the explorations conducted under archaeological supervision? Who was in charge of the supervision? Specify the Decision of the competent authority granting the approval of explorations and the applied methodology. Is company Tehnohidrosfera llc, Beočin authorized and does it possess qualifications to conduct the abovementioned type of explorations?

Not the subject of the Study.

132. Figure 80. The spatial position of two locations/zones, where magnetometry measurement was performed, demonstrates that magnetometry measurement was not performed in the area of the archeological site “Ošljane”! Supplement Figure with clearly marked boundary of the project and clearly marked location on which villa remains have been found, in order to make it clear whether the exploration was conducted in an adequate area.

The Study has been amended to comply with the comment.

133. Supplement the IA with project developer’s obligations regarding the protection of cultural heritage, as laid down in RS laws, and in detail in the Detailed Regulation Plan of “Vinča” Sanitary Landfill and the requirements issued by the Belgrade City Institute for the Protection of Cultural Monuments.

The Study provides for, among other things, measures defined by the Requirements issued by the competent authority.

134. The multidisciplinary team that conducted the Study does not include even one archaeology or conservation expert, which is a violation of Article 19 of the Law on Environmental Impact Assessment stipulating that for the purpose of undertaking an environmental impact assessment study a multidisciplinary team shall be formed, composed of persons having proof of qualification for undertaking an environmental impact assessment study, i.e. for fields that are the subject of the study in which undertaking they participate. The argument supporting the statement that the project developer needs, for the purpose of undertaking this IA, to include experts in the field of archeology and conservation as members of the multidisciplinary team, is quite obvious from the contents of the IA presented for public access, which demonstrates lack of knowledge of basic regulations in the field of cultural heritage protection.

The statement is not correct as only the signature of the responsible person is required by law.
Article 17 of the Environmental Impact Assessment Law:
“The Impact Assessment Study shall also contain basic information on the persons involved in its preparation, and their qualifications, on the responsible person, the date of completion, the signature of the responsible person and the validation of the signature with the seal of the authorized organization which conducted the Study.”
The answer to this comment is part of the answer for the comment 52.

135. Describe potential and realized impact of the project on the resettlement of inhabitants living in the informal settlement sited on the landfill body. Describe the impact of the change in the waste management system on around 12,000 people in the territory of Belgrade, whose existence depends on the possibility to collect secondary raw materials.

See Chapter 5.1 and Resettlement Action Plan developed by the City of Belgrade and working body which dealt with this issue.
The project will affect the existence of waste collectors and their households, who will no longer be able to engage in this activity once the remediation of the existing landfill starts and the new landfill begins operating. The Environmental Recovery Plan as part of the RAP study details the measures and roles of different institutions that will be engaged to provide alternative jobs and facilitate the renewal of lives and welfare of their households. Although the impact on waste collectors who regularly collect secondary raw materials, but also on those who engage in it from time to time, will be significant or moderate, the RAP is in line with IFC standards on environmental and social sustainability, in particular Performance Standard 5 (Land Acquisition and Involuntary Resettlement) and provides for the development and implementation of measures to restore income capacity.

136. The Study describes the existence of and resettlement plans for the informal settlement located on the existing landfill body. However, this settlement was resettled more than 6 months ago! The aim of the Environmental Impact Assessment Study is to analyze and describe the impact on the population before these impacts are realized, not after. On the other hand, given that the Study does not contain data on the resettlement process, resettlement results and current living conditions of the resettled population, it is clear that this is a carelessness of the project developer to really assess the impact of the proposed project on affected population.

The answer to this comment is part of the comments no. 7 and 17. All this information is followed in a separate procedure. The RAP is a supporting document. The progress and assessment of the RAP could not be addressed in detail in this Study.

137. Show separately the impact on water, surface water and groundwater, and soil, in view of the great significance of the impact of the plant construction on these environmental factors.

218. “Chapter considers only the impact of construction of the new landfill with accompanying facilities on water. However, the scope of this IA also includes:

1. Entrance-control zone;
2. CDW plant platform;
3. Operating platform;
4. Upper platform with the system of channels and lagoons for collection and evacuation of rainwater and leachate;
5. Lower platform with the system of channels and lagoons for collection and evacuation of rainwater and leachate and the leachate treatment plant (LTP):
6. Flaring system.

Supplement the IA with the analysis assessing the impact of the proposed facilities on groundwater, surface water and soil in the area of each of the above facilities.

The Study shows the impact of the entire plant, including the cumulative effects of all its components. The term New Landfill refers to the new landfill and all other accompanying facilities as defined in the Location Requirements and the Study itself.

138. Supplement the IA to comply with the comments on Chapter 2.3 OVERVIEW OF PEDOLOGICAL, GEOMORPHOLOGICAL, GEOLOGICAL, HYDROGEOLOGICAL AND SEISMIC CHARACTERISTICS OF THE TERRAIN

“The occurrence of groundwater is registered on the surface, around the existing landfill perimeter. Groundwater levels were measured at 12 piezometers, and average relative water levels (depth from the surface to the groundwater) in these piezometers ranged from 3.40 to 28.00m. Monitoring, which was performed in the period from 25 October 2017 to 30 March 2018, showed that groundwater levels were lower than the waste deposited (Source:

Geological - geotechnical study for engineering and construction of the new landfill and remediation of the existing solid municipal waste landfill Vinča (Energoprojekt Hidroinzenjering JSC (Belgrade, December 2017)". If the document was drafted in December 2017, how is it possible that a source of data is from March 2018?!

The first version was drafted in December 2017, but the document was amended and improved up to the final version in May 2019, according to measurements conducted continuously.

139. At which piezometers measured values ranged "between 3.40 and 28.00 meters"? Compare with the data given in Chapter 2.3 OVERVIEW OF PEDOLOGICAL, GEOMORPHOLOGICAL, GEOLOGICAL, HYDROGEOLOGICAL AND SEISMIC CHARACTERISTICS OF THE TERRAIN. "The project site is located outside the boundaries of water protection (areas for water protection are the areas with special requirements and prohibitions for protection of drinking water from harmful effects) and flood-prone areas, making this site suitable for all activities which are part of the project. Please show the boundary of the wetland under special protection regime on the map.

Please see the attached Requirements obtained from the competent authorities.

140. Show the flood zone map.

The lowest level of the Vinča landfill is located at approx.85 m.a.s.l., 10 m higher from the maximum recorded water level in the wider area (Source: RHMS of Serbia, data from 1992-2016 and 1972-2016, depending on the metering station), so it can be concluded that a risk of flooding does not exist. A flood map is therefore not needed.

141. "During excavation works (excavation depths ranging from 170.00 m.a.s.l. to 178.00 m.a.s.l. are lower than the observed groundwater levels), it is highly likely to encounter local ground flows and they will temporarily or permanently be diverted towards a natural receiving body."

The excavation depths mentioned in the comment refer to the area of the new landfill sited upstream of the existing landfill, therefore this area is outside the area of impact of the existing landfill, and within the area not considered to be affected by groundwater. Therefore, no groundwater quality control is planned in case of contact with it. However, the contractor in charge of landfill excavation works will act in accordance with any groundwater monitoring requirements set by applicable / responsible authorities.

142. Supplement the chapter with the overview of groundwater quality measurement results from the installed piezometers, covered by this IA, as well as those covered by the Study prepared by the project developer for the EBRD loan approval purposes.

Conclusions of groundwater quality investigations are shown in this Study.

143. During the construction phase, the impacts of the project on groundwater and vice versa are likely due to the high levels of groundwater on the site, which should be further investigated in following monitoring."

See answer no. 227.

144. If there was not enough time to perform key analyses, such as the groundwater level and quality analysis, soil composition analysis, it means that it was too early to undertake this IA.

The sentence has been changed. Monitoring of groundwater quality and level has been performed since 2017, at least once quarterly.

145. Fauna: Provide a clear overview of observed habitats of individual species in relation to the type of proposed works and the location of proposed works, in order to be able to assess the impact on the fauna during construction, especially the impact on the protected and strictly protected bird species.

Protected natural goods: Really? Indicate on the map the distance of the protected natural goods and describe proposed works.

See Chapter 2.6 of the Study.

146. Noise: It sounds incredible, and in the end utterly imprecise by the project developer to have determined at the measuring points that, at the time of the construction of proposed facilities, the noise level is lower than during other days.

Noise was measured by the Public Health Institute of the City of Belgrade and it issued an official report thereof. Noise measurement was performed in March 2018 at 10 measuring points. Please see Chapter 5.6.

147. Landscape: Description of landscape changes to happen during the construction of proposed facilities is missing.

See Chapters 2.7 and 5.8. Also, see attachments provided in Book no.2.

148. Cultural heritage: Supplement the chapter to comply with the comments on Chapter 5.7. STRUCTURES, IMMOVABLE CULTURAL GOODS, ARCHEOLOGICAL SITES AND AMBIENT UNITS. We remind that any unauthorized execution of archeological works is a criminal offence. (Article 353a of RS Criminal Code), especially unauthorized archaeological explorations within the coverage of cultural good enjoying prior protection.

See the attached Requirements issued by the competent authorities. No criminal offence is involved.

149. "Potential effects in regular operation on the local community in terms of air quality, noise, water quality, soil quality, transport and traffic were considered. It may be said that the project entails certain effects and risks relevant to the environmental quality and the local community, but these effects will be significantly reduced or eliminated compared to the current state".

It is utterly irresponsible and unprofessional to replace the key analysis with a single sentence, i.e. an arbitrary conclusion on the impact of the project on the environment. What is the aim of undertaking this IA if it does not contain the key elements of the key chapter on the impact of the proposed facilities on the environmental factors?!

Overview of impacts in regular operation on the following factors is missing:
- Water;
- Pedology:
- Habitats and flora;
- Fauna;
- Protected natural areas;
- Air:
- Odor;
- Climate changes;
- Noise;
- Landscape;
- Cultural heritage;
- Infrastructure;
- Waste.

The statement is completely false.

150. When supplementing the IA with the assessment analysis of the impact of the plant construction on air quality, pay special attention to the fact that neither Serbia nor Belgrade has a laboratory capable of performing an analysis of the concentration of highly carcinogens, dioxins and furans, in the air. The emission of these compounds is an integral part of the waste incineration process, both during spontaneous burning (fire at the landfill in Vinča in June 2017) and during waste incineration in the EfW Plant.

See the answers for the comments nos. 46, 154 and 178.

151. It would be really necessary for the project developer to decide on the actual subject of this IA, in view of the fact that he seems to be juggling throughout the entire IA with impacts of all proposed facilities (the existing non-sanitary landfill, EfW plant with accompanying facilities, new landfill with accompanying facilities) and remediation of adverse impacts, in relation to the content of the specific chapter and the subject of this IA. Thus, the IA deals with the

assessment of major adverse impacts of the current state on the landfill, shows positive impacts of the EfW plant construction in terms of terminating further waste disposal, but without taking into account the emissions from the EfW plant. In a similar fashion, adverse visual and other impacts (odor, pollution) are taken into account in assessing the baseline state, whereas their addressing is presented as a positive contribution to implementing the subject of this IA, while the project involving rehabilitation of the existing non-sanitary landfill was not analyzed under this IA.

The answer to this comment is part of the answer for the comment no. 54.

152. Supplement the IA with information on the number of employees at the Vinča complex and compare it with the planned number of employees. What are the guarantees that jobs will be offered to the local population first?

Secondary raw material collectors will have a right to assistance in finding a job and restoring their income as described in the Resettlement Plan.
However, as a general principle, employers have obligations to their employees. Nonetheless, the City of Belgrade has an obligation to waste collectors who are not formally employed by PUC "Gradska Čistoća" or other recycling companies and therefore they will be assisted as described in the RAP.
Jobs available during the construction phase of the project, at the Vinča landfill, or later during the operational phase of the new landfill, as well as jobs at other locations where PUC "Gradska Čistoća" operates (e.g. at sites of future recycling centers), will be offered to all secondary raw material collectors eligible for assistance under this Resettlement Plan, regardless of their place of residence. Job offers and contacts with collectors will be organized by the Secretariat for Social Protection in cooperation with PUC "Gradska Čistoća".

153. Climate change impact of the project:

The answer to this comment is given in Chapter 6.4. of the Study.

154. For a complex project such as the project of construction of incineration plant and new landfills in Vinča, a separate climate impact analysis must be conducted. If there was not enough time allowed to complete all the analyses necessary for assessing the impact of the project on the environment, it means that it was too early to undertake the IA.

The answer to this comment is given in Chapter 6.4. of the Study.

155. The project will have a positive impact on greenhouse gas emissions, owing to the power and heat generation and feed back into the Serbian grid (making a positive contribution in terms of CO2 emissions of real mixing of Serbian electricity production) and a significant reduction in CO2 emissions from the old landfill. The enormous continuous improvement of greenhouse gas emissions (owing to the remediation of the landfill, transition to an emission-control process and generation of heat and power) will result in saving more than 11.5 million tons of CO2 over the global period 2025-2046, with the average annual greenhouse gas reduction equivalent to more than 112,670 passenger vehicles per year or 250,800 hectares of forest (Source: US EPA calculator for greenhouse equivalents, September 2017)".

As shown in Table 34, GHG emissions – whole location components, the remediation of the existing landfill can completely reduce greenhouse gas emission. On the other hand, the construction of new landfill, the construction of EfW plant and other facilities will result in the emission of new 405000 units (2035). In addition to harmful emissions from the EfW plant, the technology of which is considered outdated even in the year of contract signing (2017), harmful emissions from the new landfill will continue for at least another 50 years!

The answer to this comment is given in Chapter 6.4. of the Study.

156. Also, it is necessary to compare not only with the currently active power plants (out of which 70% use coal which is another fact calling for an obligatory change in accordance with the EU climate and energy regulations), but also with alternative technologies. In the category of electricity generation, most of the latest available technologies have lower emission levels than incineration (e.g. wind power plants, solar power plants). In the category of waste

management, the emission level lower than the one generated by waste incineration, is certainly achieved by waste generation prevention, waste composting and recycling.

It is not the subject of this Study.

157. In view of the above mentioned, it is highly irresponsible and unprofessional to conclude that the "Project will have a positive impact on greenhouse gas emissions".

The answer to this comment is given in Chapter 6.4. of the Study.

158. Revise the chapter by specifying precise results on greenhouse gas emissions and the climate change impact of the project.

The answer to this comment is given in Chapter 6.4. of the Study.

159. Which part of the IA contains the impact assessment on other climatic factors?

Excluded from the impacts related to greenhouse gases, the direct impacts of the project on climatic factors (wind, temperature, hydrometry ...) are considered negligible due to the characteristics of air emissions and small changes in topography.

160. It is not possible to verify the validity of the presented conclusions, in view of the fact that description of the abovementioned analysis is not provided, nor the analysis itself is attached to the IA. The validity of the conclusions can be doubted also because the project developer denies even the vulnerabilities of the project relating to the climate change which were specified in previous parts of the IA. For example, Chapter 3.1 (page 119) states that the operation of the LTP plant may lead to excessive water pollution if outside temperatures are greater than 25°C or lower than -5°C.

The answer to this comment is given in Chapter 6.4. of the Study, with the last sentence being false because something like that was neither said nor is true.

161. Which facilities within the Vinča complex are referred to? This is particularly important because throughout the entire IA, the subject of this IA remains vague and unclear; instead, the assessment of impacts of individual facilities serves to juggle along the way, randomly, as needed. If the project developer decided to limit this chapter of the IA to assessing the impact of the new landfill on the environment, please analyze and describe the cumulative effect of the new landfill and accompanying facilities with other facilities and technological solutions proposed within the Vinča complex.

The answer to this comment is part of the answers for the previous comments. The term New Landfill refers to all accompanying facilities defined at the beginning of the Study and in the Location Requirements.

162. Which facilities in the surroundings of the Vinča complex are referred to? This is particuraly important because other parts of the IA mention important vulnerable facilities in the surroundings, which are left out here (for example, the Institute for Nuclear Research Vinča). Please show the position of these facilities on the map.

See Chapter 2.0. Description of macro-location. The information is given in the table and on the map.

163. Which facilities within the Vinča complex are referred to? This is particuraly important because throughout the entire IA, the subject of this IA remains vague and unclear; instead, the assessment of impacts of individual facilities serves to juggle along the way, randomly, as needed.

The new landfill and accompanying facilities defined in the Location Requirements and at the beginning of the Study. Nothing is juggled with, the scope of the Study is clear and precisely defined from the beginning.

164. Supplement the IA with the following documents prescribed in the Detailed Regulation Plan of "Vinča" Sanitary Landfill. In accordance with Article 58 of the Law on Environmental Protection, develop an Accident Prevention Policy or a Safety Report and Accident Protection Plan.

The documentation will be drafted in keeping with legislation. Not the subject of the Study.

165. In accordance with the Law on Emergency Management, develop an Accident Protection Plan, being an integral part of the Emergency Protection and Rescue Plan.

The documentation will be drafted in keeping with legal regulations. Not the subject of the Study.

166. In accordance with the Rulebook on the List of dangerous substances and their quantities and criteria for determining the type of document to be prepared by the operator of SEVESO establishment/installation ("Official Gazette of RS", nos. 41/10 and 151/15), identify SEVESO installations and undertake further protection measures in line with the classification performed.

On the basis of available data submitted so far to the Ministry of Environmental Protection (Ministry of Environmental Protection, no. 532/02/00816/2018/03, 3 April 2018) by operators of Seveso establishments/installations, it was determined that the area covered by the Detailed Regulation Plan of Vinča Sanitary Landfill does not include Seveso establishments/ installations, while in the territory of the City of Belgrade, to which Municipality of Grocka belongs, there is a large number of Seveso installations, but the effect of potential chemical accidents in them does not pose a hazard to the area within the mentioned Detailed Regulation Plan. On the contrary, the area covered by the said Detailed Regulation Plan may be endangered by the effects of a chemical accident from the territory of the neighboring city Pančevo, in the worst-case scenario of an accident in the Seveso establishment - Chemical Industry "Azotara" ltd. Pancevo.
The area covered by the Detailed Regulation Plan of Vinča Sanitary Landfill is located in the hazard zone of toxic ammonia clouds, which is a possible result of the worst case scenarios established by this company, partly for IDLH concentration value (300 ppm ammonia), over a 30-minute exposure duration, and partly for concentration of 0.1IDLH (30 ppm ammonia) over a 30-minute exposure duration. This accident scenario is a Level IV accident - a regional level, and the probability of a major accident occurrence is estimated to be low (4.7 h 10-7 year -1-1). On 5 August 2016, Chemical Industry "Azotara" ltd. Pančevo passed a Decision approving the Safety Report and Accident Protection Plan, outlining the identified accident scenarios, hazard zones and prevention measures by the operator to prevent an accident.
There will be no dangerous substances in the EfW plant in a quantity based on which the plant would be classified as an establishment posing a high or increased risk of accident according to the Rulebook on the list of dangerous substances and their quantities and criteria for determining the type of documents to be produced by the operator of the SAVESO establishment/installation. ("Official Gazette of the RS" 41/10, 51/15 and 50/18).

167. Provide a map showing recorded landslides in and around the project site, in order to undoubtedly establish that works on the project implementation shall not cause the activation of landslide which could consequently affect the archeological site of exceptional importance for RS "Belo brdo", archeological site "Ošljane", and other archeological sites under the General Regulation Plan of the building area of the local self-government unit, Unit XX, the municipalities of Grocka, Palilula, Zvezdara and Voždovac.

See Chapter 7.1 of the Study.

<u>Comments submitted by Bird Protection and Study Society of Serbia</u>

1. The Institute for Nature Conservation of Serbia states in its issued Decision that the scope of amendments to the Plan does not cover important ecological areas and ecological corridors of international importance of the ecological network of the Republic of Serbia. However, the mentioned Plan for which the Decision has been issued actually falls into a bird important area, that is, the area of ecological network "Confluence of the Sava and the Danube rivers (RS017 IBA)", that is, parts of the following plots 2669/2, 2669/11, 512/2, 512/3, 513/2, 512/1, 514/4, 513/1, 538/1, 538/3, 538/4, 539/1, 539/2, 538/2, and 2670/3. At the same time, the Plan itself states that the area of the ecological network "Confluence of the Sava and the Danube rivers (RS017 IBA)" is covered by its scope (Section 3. Legal and planning basis, page 5). The Decision issuing authority disregarded this, and for this reason the document

does not contain, but should have requirements that would prescribe obligations to determine the properties of the site with regard to strictly protected and protected species, particularly since such conditions are prescribed for other aspects of natural values in point 3), stating the obligation to determine the geological, hydrogeological and hydrographic properties of the site. Likewise, in analogy with point 30), which stipulates that if the contractor, during works, encounters geological-paleontological documents or mineralogical-petrological structures, which are presumed to have the property of a natural good, the contractor is obligated to inform the Ministry of Environmental Protection and take appropriate measures, we consider that it is also necessary to stipulate such an obligation in the case of finding strictly protected species when undertaking the environmental impact assessment study. The basis for this is in the Law on Nature Protection ("Official Gazette of the RS", nos. 36/2009, 88/2010, 91/2010 - corr., 14/2016 and 95/2018 - other law), which states in Article 4 (1) 27) that protected natural goods include strictly protected wild species.

The comment is not addressed to the organization which undertook the Study, but to the organization which issued the requirements.

2. In addition, the planning basis – the General Regulation Plan of the building area of the local self-government unit – Unit XX, Municipalities of Grocka, Palilula, Zvezdara and Voždovac – (settlements: Kaludjerica, Leštane, Boleč, Vinča and Ritopek) – Text ("Official Journal of the City of Belgrade", no.66/17) states that its scope include Environmental unit Vinčanska pond - (recorded natural good), which is part of the ecological network area, with an area of about 71.0 ha, as visible in the drawing as well, where the area of the ecological network in the scope of Amendments to the Detailed Regulation Plan of "Vinča" Sanitary Landfill is even larger than the area on the above listed plots on which the "Confluence of the Sava and the Danube rivers (RS017 1VA)" is sited. Among the acts listed in the legal basis in the decision issued by the Institute for Natural Conservation of Serbia there is no Regulation on Ecological Network ("Official Gazette of the RS", no. 102/2010), which is the reason why the Decision does not contain requirements specifying protection measures for the ecological network, i.e. protection measures for the protection zone listed in Annex 3 to the Regulation.

The comment is not addressed to the organization which undertook the Study, but to the organization which issued the requirements.

3. In view of the above mentioned, we consider it necessary for the INCS to issue a supplemental decision on requirements, which would constitute a framework for mandatory site investigations (pursuant to the Law on Environmental Impact Assessment and the Rulebook on the Scoping of the Environmental Impact Assessment Study), in order to appropriately collect data on natural values of the area - protected species as protected natural goods, ecosystems being part of the ecological network, on which the project can have an impact (either this or its next phase, which is not the subject of the study, falls into the area of the ecological network) in the environmental impact assessment study of the project, as well as to propose measures to prevent, reduce or offset effects.
   Also, we consider unacceptable and contrary to the Law on Environmental Impact Assessment the practice that data on the site, environmental factors, potential impacts, etc. which would be substantially complementary to the study, is collected after the completion of the environmental impact assessment process.

The comment is not addressed to the organization which undertook the Study, but to the organization which issued the requirements. Site investigations have been carried out from the end of 2017 to the present and the Study was created in accordance with the conclusions of the investigations. Some investigation results were not included in the text of the Study which was made available for public access only for the reason the document was in the procedure and it was not possible to amend it, with the scope of investigations presented in that version of the document being in accordance with the requirements specified in the legislation of the Republic of Serbia. The Study was supplemented with information that was not presented in the first version of the document.

4. The listed plots and the drawings in the Study (in several places, starting from the front page) do not coincide, so it is not clear whether the omitted plots (referring to the communal path leading to the Vinča pond) are part of the project or not, though the Study states that they are part of the Detailed Regulation Plan on the basis of which the requirements were obtained from the INCS. Whichever of these two cases is, particularly given the phase of the project involving the construction of retaining structure and lagoons and water treatment plant, it is necessary to present the impact on nearby important ecological areas since the impacts do not end at theoretical boundaries of the area covered by the plan.

The plots listed in the studies are plots defined by the Location Requirements and represent the only plots on which the facilities defined by the projects, for which a building permit will be issued and for which these two environmental impact assessment studies have been undertaken, will be built. The rehabilitation of the existing landfill is not the subject of the environmental impact assessment study and the problem of rehabilitation is solved through the Existing Landfill Rehabilitation Project, according to the legislation of the Republic of Serbia. The said Rehabilitation Project was approved by the Ministry of Environment in July 2019.

5. The research cited in the Study conducted by the Bird Protection and Study Society of Serbia (BPSSS) refers to only one-day field visit to the existing landfill and its surroundings in spring 2018 and as such it cannot be considered sufficient to show “baseline state” for the purposes of the environmental impact assessment study, as BPSSS, which developed the report, responsibly claims. The report (as it is titled) is preliminary and should serve as an outline of a project task that would be implemented following what BPSSS, as a member of BirdLife International, considers good practice for assessing the impact of large projects, especially when it comes to ecological network sites or protected species for which the same sites are designated as such. Since the proposed research was not conducted and there is no data in the Study in support of other bird research at all, and it concerns only a small fragment of the annual, i.e. seasonal changes of the ornithofauna at the Vinča landfill, “which together with the nearby areas of the ecological network is known as one of the largest aquatic bird gathering sites in Serbia (and among larger seagull gathering sites in the region), BPSSS considers this partial presentation to be an example of erroneously or incompletely established factual situation and as such constitutes the basis for challenging a possible decision approving the study.

The answer stated that for the purpose of conducting the environmental impact assessment study, in the aforementioned wider area of the Vinča landfill, bird monitoring was carried out throughout one calendar year, within 4 campaigns. Relevant ecological data on locally distributed species and specificities associated with the subject area was collected.
Preliminary research was conducted in April 2018 (Bird Research at the Vinča Landfill, Preliminary Report, Bird Protection and Study Society of Serbia, Novi Sad, April 2018, authors M. Šćiban, N. Stanojević). It was followed by several studies: in September / October 2018 (Bird study at the landfill and its surroundings Vinča, Belgrade during the bird migration from September to October 2018, October 2018, League for Ornithological Action of Serbia, author: D. Simić) and December 2018 (Bird study at the Vinča landfill and its surroundings in Belgrade in December 2018, January 2019, League for Ornithological Action of Serbia, author: D. Simić). In October 2018, the available literature and field data were summarized in the Review of previous bird observations at the Vinča landfill and surrounding areas (published by Dragan Simić, League for Ornithological Action of Serbia).
Monitoring of bird populations continued during May and June 2019 (Study of Bird Breeding at the Vinča landfill in Belgrade in the period May-June 2019, Preliminary Report, July 2019, D. Simić, M. Raković).
A summary of the results of these studies is presented in the supplemented Study.

6. For these reasons, we are of opinion that the Study cannot be approved, that the Study failed to fulfill the obligation to conduct comprehensive research of all aspects of the environment on the site (the time period of one year was available for that), and to collect data on the current state, failed to present the actual cumulative impact with other projects or phases of implementation of the same project even when a request for screening (determining whether

the study is required) or scoping of the study was made, as well as alternative solutions in case the impact on aspects of natural values observed during this new research is not acceptable (the possibility that the study does not even take into consideration), and if so, presents precise measures to prevent, reduce and offset effects, for which other parties concerned will have the possibility of timely access and opinion.

The stated view is false and represents a personal view on the need to reject the study, and it was made by unilaterally observing the issues without essential understanding of the technical solutions and mutual relation of all described environmental factors, stated measures and legislation defining the next phases in implementation and operation of an infrastructure project in accordance with legal regulations governing environmental protection and planning and construction.

Comments submitted by Petar Denčić from Belgrade

1. General aspect: 1. Sustainable development: the project represents an activity sitting at the bottom of the waste management hierarchy. The proposed project adversely affects the following sustainable development goals:

This statement is not true, given that Chapter 3.2 of the Study for the landfill project contains:

Waste Management Hierarchy (Law on Waste Management):
- *Prevention*
- *Preparing for reuse*
- *Recycling*
- *Other recovery operations (recovery for energy production, etc.);*
- *Disposal.*

Prevention of waste generation in the City of Belgrade is conducted through activities defined at the national level, and is reflected in, primarily, through applying the principle of cleaner production concept, circular economy, defining by-products, end-of-waste status, and other. Intense efforts have been made to raise the population awareness about the importance of prevention for over 10 years.

Preparing for reuse and recycling start with relatively well-organized primary selection system which operates in the City of Belgrade. Primary selected secondary raw materials are collected through a wide network of secured and placed collection dumpsters in the city of Belgrade. Primary selected secondary raw materials are transported to existing municipal waste collection centers where secondary separation is carried out at the separation line (Ada Huja, New Belgrade).

Decision of the Mayor of Belgrade no. 501-4180/16-G dated 17 June 2016 determined locations for establishing new waste collection centers - recycling centers and transfer stations. The City of Belgrade budget for 2019 allocated funds for the procurement of equipment and equipping of two more recycling centers with a separation line and other necessary equipment. Recycling centers also collect special types of waste pursuant to the Law.

The 2019 Budget also provided for the procurement of additional dumpsters for the separate municipal waste collection system (paper, plastic, metal, glass, mixed municipal waste), additional underground dumpsters, numerous machinery and vehicles for waste collection and collection of sorted secondary raw materials, roll-off dumpsters, baling presses with a capacity of 100 t, with the aim of upgrading the existing system and expanding the coverage of the territory with a waste collection service.

Procurement contracts are made between suppliers and PUC "Čistoća". This construction project of new landfill and other facilities also proposes the installation of a construction waste treatment line.

Other recovery operations (energy recovery from waste, etc.). The landfill is to be built at the site

where the existing landfill is already located at which the entire amount of collected mixed municipal waste is disposed. Instead of such a solution, the project involves a modern energy-from-waste plant, as well as a biogas plant using landfill gas from the body of existing and new mixed municipal waste landfill.

In the future, in the City of Belgrade, only amount of mixed municipal waste remained after primary and secondary waste selection, recovery and treatment at construction waste treatment plants, energy recovery from waste and energy recovery from landfill gas, as well as after separation of green waste from the maintenance of green spaces and cutting down of trees done by PUC "Zelenilo" at special locations, will be disposed.

2. Quality education – numerous generations have been educated for environmental preservation and resource protection, that recycling is the way to achieve it, and incineration in this case provides justification for a negative attitude of the population towards their environment.

The answer to this comment is given in the answer for the comment 1.

3. Affordable and clean energy – it is proposed to subsidize energy generation, which transfers the cost of production to all citizens. Generating energy from waste is considerably more expensive compared to other forms of energy generation.

Not the subject of the Study.

4. Industry, innovation and infrastructure – the project development includes CO_2 emission in the air and contribution to the climate change, thus affecting economic and social development in Serbia. The project negatively affects the innovation process as it puts pressure on the economy in terms of increasing production inputs.

The answer stated that the impact on climate change is presented for the entire project proposed at the site of Vinča landfill complex and it covers all relevant facilities, as follows:
- *Cogenerated plants using municipal waste and landfill gas*
- *New landfills*
- *Existing waste landfills after the closure, remediation and recultivation.*

Please view the following chapters of the Study:
- *Chapter 6.3 – Impact of the project on climate change of the Study*
- *Chapter 6.4 – Other potential risks and impacts (Impact of the project on climate change) of the Study for the landfill*

Those chapters clearly explained and demonstrated that:
"The project will positively affect greenhouse gas emission, owing to generation of electricity and heat energy and major reduction of CO_2 emission from the old landfill."

5. Sustainable cities and communities- the project affects the pollution of the city and the creation of jobs which will not negatively affect resources.

Covered by the Study, Chapter 5.1 and other chapters

6. Responsible production and consumption – the project will contribute to a decline in economic activity due to consumption of non-renewable resources, the impression of further indivisibility and inefficiency of production processes and competitiveness on the market.

If we accept the definition that sustainable energy is providing energy that that meets the needs of the present without compromising the ability of future generations to meet their own needs, which is replenishable within a human lifetime and causes no long-term damage to the environment.
Considering the nature of municipal waste and the conclusion from the EIA Report showing that demonstrated technology and solution will be applied with limited impact on the environment, we confirm that the proposed projects provide sustainable energy solutions for the population of Belgrade thanks to electricity and heat these projects generate.

Also, see the answer to the comment no. 1.

7. Climate action – available solutions which are affordable and adjustable enable communities to move forward cleaner and greener energy. The project with its negative impact, primarily on climate, moves the city away from acceptable economic models.

The answer to this comment is part of the answer for the comment no. 4.

8. Sustainability: the project is not complied with the EU commitment defined in the EU Action Plan for the Circular Economy. The Study takes as an example EU Directives which are basis for national legislation as well. These EU Directives are being amended and adjusted to the requirements specified in the EU Action Plan for the Circular Economy which involve major reductions in waste generation, 100% of recyclable plastics by 2030 and full application of the waste management hierarchy. The Waste Management Strategy of Serbia mentions "establishment of economic instruments and mechanisms necessary in order to ensure the system for investments into long-term sustainable activities". Serbia, as a candidate country for EU membership, will have to adjust to the requirements of the Circular Economy. The proposed project represents an activity form the domain of linear economy.

This statement is not correct.

The National Waste Management Strategy 2010-2019 (2010) and Proposal of Waste Management Strategy 2015-2030 (planned for 2016) establish the framework for final waste reduction and sustainable waste management. The Proposal of Waste Management Strategy 2015-2030 proposes following targets:

- *Reduce disposal of biodegradable waste at landfills by 25% by 2022, 50% by 2026 and 65% by 2030;*
- *Achieve at least 60% of reuse and 55% of recycling of packaging waste by 2025;*
- *Achieve at least 50% of recycling of municipal waste by 2030;*
- *Improve the specific waste streams management system (waste tires, used batteries, waste oils, waste vehicles) to achieve 4 kg per capita of separately collected waste vehicles by 2019 and at least 45% of batteries and accumulators by 2016.*

The Energy-from-waste plant is planned for 340.000 t/y, covering only 67% of projected residual waste or compared to a total solid waste quantity of 750.000 t/g, including waste to be recycled and composted, only 45% of the projected waste in 13 municipalities covered by the project for Belgrade. As there is no plan for other waste in power plants in Serbia at this moment, this proposed project does not hinder the capability for Serbia to achieve the above mentioned target of 50%. More importantly, achieving this target highly depends on the separate collection system which is out of the project scope. Achieving the collection rate will be subject to establishing an adequate collection system by the municipality which is out of the scope of this project and these EIA studies. According to the PPP Contract, there is no concept of minimum guaranteed tonnage to be delivered by the City.

The City of Belgrade is currently conducting a procedure for selecting a consultant to develop Local Waste Management Plan 2021-2030, in order to continue establishing the system and organization for managing municipal, inert and non-hazardous waste in a manner which ensure minimum risks and dangers for the environment and conditions for waste generation prevention, reuse and recycling of waste, use of useful properties of waste, disposal, if other adequate solution does not exist, as well as raising awareness about waste management.

Also, the Ministry of Environment is in the process of drafting the Waste Management Strategy 2020-2029.

Also, see the answer to the comment no.1.

9. Special aspects:

Adverse impact on soil, groundwater, watercourses and their self-purification ability. Load generated in the old landfill body remains to negatively affect the environment by continuing to use the landfill for gas extraction.

This statement is not correct at all, namely the truth is completely opposite of what is stated. The

Study clearly defines that one of the project major benefits is control and improvement of the quality of effluent currently discharged into the environment, in keeping with all legally defined standards, and above.

The existing landfill body will be rehabilitated according to the Existing Landfill Rehabilitation and Recultivation Project which was approved by the Ministry in July 2019; landfill gas will be in a controlled way extracted from the body of the old and new landfill, and used, surplus of leachate will be in a controlled way extracted, all leachate will be treated by the wastewater treatment system prior to discharge into the environment.

10. Incineration residues, particularly their most toxic components, represent a new load on the environment and hard-to-solve ecological problems. The new (sanitary) landfill proposed on the Vinča site, immediately next to the old landfill, represents an additional load which will be impossible to control due to unrehabilitated old landfill.

The statement is not correct. Please see a part of the text describing mutual position and relation between the existing and the new landfill, but also the project of construction of sanitary landfill with all elements of protection from external impacts.

11. Geological and hydrogeological investigations state not enough collected data over a longer period of time. The map is hydrogeologically unsuitable for the project.

As regards the comment that the soil is unsuitable for the project, the situation is actually opposite as low water permeability of the soil is extremely suitable for the development of the proposed infrastructure involving the New Landfill.
An important parameter for the Vinča landfill is the permeability of soil beneath the landfill bottom which can modify the infiltration rate. Infiltration values have been measured within old and recent studies conducted on periphery of the site at several locations upstream and downstream of the landfill. Based on geotechnical investigations carried out on periphery of the disposal site, maximum and minimum permeability values are 10-8 and 10-9 m/s, respectively. Permeability can be further reduced by taking into account a clogging phenomenon that is often observed on surfaces of ponds. Another phenomenon is the possible and probable saturation of the soil with water beneath the landfill bottom, which prevents further infiltration and thus creates an artificially reduced permeability value.

The shown data is part of the "Geological - geotechnical study for engineering and construction of the new landfill and rehabilitation of the existing solid municipal waste landfill Vinča" (ENERGOPROJEKT HIDROINŽENJERING a.d. Beograd, December 2017) and other mentioned technical documents the results of which are impossible to show all in the environmental impact assessment study, but they are certainly attached to it as required documentation in the procedure of obtaining construction permit and represent basic data in design development. Their content and results are certified with signature and seal of responsible persons; so it is a little irresponsible to make arbitrary criticism without thorough inspection of the content of these studies and project documentation in the entirety.

12. The project will adversely impact on water supply to the population of Vinča settlement, which are supplied with drinking water from the Danube River, into which wastewater from the project site will be discharged.

The answer to this comment is part of the answer to the comment no. 9. Also, see the requirements issued by the Public Utility Company "Belgrade Waterworks and Sewerage", issued in the integrated procedure, no. V-163/2019 dated 13 March 2019 and no. V-2016/2019 dated 26 March 2019.

13. Leachate and seepage from the landfill have a direct contact with the Ošljanska pond which is a part of the special importance area "Confluence of the Sava and Danube rivers".

The statement is not true. Once the proposed project is completed, only treated leachate with quality in compliance with valid Serbian regulations will be discharged directly into the Ošljanski creek.

14. Proposed remediation of the terrain will affect other neighboring areas, primarily IBA. Due to the mobility of the fauna, loads can be put on other ecosystems. No genetic studies on flora and fauna situation is mentioned.

The answer is already provided in Chapters 5.5 and 6 in both Studies.

15. The project will have negative effects on the population health. Belgrade stands out in Serbia by the highest mortality rate, due to primarily industrial facilities and traffic. The project will have an increasing effect on these two types of pressure.

The Study concluded that project's impacts are not expected to be of such magnitude they could cause significant cumulative effects. It is demonstrated in detail in Chapters 6 and 7of the Study.

16. The project is of unlimited period and does not contain provisions on action after the decommissioning.

    Conclusion: numerous negative effects at the given site and project unsustainability for a longer period represents a basis for negative evaluation of the Study.

In developing documents for obtaining the integrated permit (IPPC), pursuant to the Law on Integrated Environmental Pollution Prevention and Control, the project developer shall develop and submit a Plan of environmental protection measures after the termination of operation and closure of the plant. An integrated permit is compulsory and obtaining the Exploitation Permit for using the plant and landfill is conditioned on this permit, pursuant to the legislation of the Republic of Serbia.

On the basis of the above stated, the Technical Commission concluded that the reasoned comments from the previous Report on Study Review were accepted, namely, the Study was supplemented and amended to comply with the given comments. In this regard, the relevant Environmental Impact Assessment Study contains all the elements based on which it can be evaluated the suitability of proposed measures to prevent, reduce or offset potential adverse effects of the project on the current state of the environment in and around the site during the project implementation, in the event of accidents, and upon decommissioning of the project, as well as environmental impact monitoring programme.

The Decision and the relevant Environmental Impact Assessment Study represent an integral part of the technical documentation, in keeping with Article 18 of the Law on Environmental Impact Assessment ("Official Gazette of the RS", no. 135/04).

This Decision is final in the administrative proceedings.

Legal remedy: This Decision may not be appealed against. The project developer and the public concerned may initiate administrative proceedings by lodging an appeal to the competent court within 30 days after receipt of this Decision, that is, from the day of its publication in the public media outlets.

MINISTER
Goran Trivan

Deliver to:
- Project developer
- Bird Protection and Study Society of Serbia, 6/43 Partizanskih baza Str., 2100 Novi Sad,
- Centre for Ecology and Sustainable Development, 15/13 Korzo Str., 24000 Subotica,
- Citizens' Association "Right to the City" (*"Pravo na grad"),* 36 Bulevar Arsenija Čarnojevića, 11070 Belgrade,
- Citizens' Association "Let's Not Drown Belgrade" ("*Ne da(vi)mo Beograd"*), 106 Cvijićeva Str., 11000 Belgrade,
- Petar Denčić, from Belgrade, 316 Bulevar Kralja Aleksandra, 11050 Belgrade,
- Sector for Environmental Monitoring and Prevention
- Archive