

SERBIA RAIL INFRASTRUCTURE URGENT RENEWALS

Stakeholder Engagement Plan (SEP)



July 2024

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List of Abbreviations

E&S	Environmental and Social
ESP	Environmental and Social Policy
EBRD	European Bank for Reconstruction and Development
NTS	Non-Technical Summary
PIU	Project Implementation Unit
PR	Performance Requirement
SEP	Stakeholder Engagement Plan
SRI	Serbian Railways Infrastructure
RoS	Republic of Serbia

1 Introduction

1.1 Description and Project Context

The Project. The EBRD is considering financing the Serbia Rail Infrastructure – Urgent Renewals Project to support the Republic of Serbia (the “RoS”) in purchasing materials for maintaining various sections of its railway network, totalling approx. 1,090 km. All planned railway works fall under regular maintenance activities (e.g., replacement of rails, sleepers, switches).

The Project is aimed at enhancing the quality of rail infrastructure with a particular emphasis on improving operational speed and reliability, as well as the safety of passenger and freight rail services by facilitating the prevention of derailments.

The list of the railway network sections included in the Project scope is provided below:

No. railway	Railway	Section
115	Shunting station Belgrade “B” – Rasp. “R” – Rasp. “A” – (Resnik)	Shunting station Belgrade “B” – Rasp. “R” – Rasp. “A”
117	Shunting station Belgrade “A” – Rasp. “T” – Rakovica	Rasp. “T” – Rakovica
103	(Rakovica) Jajinci – Mala Krsna – Velika Plana	Mala Krsna – Velika Plana
107	Belgrade Center – Pancevo – Vrsac	Belgrade Center – Pancevo – Vrsac
108	Resnik – Pozega – Vrbnica – state border	Valjevo – Pozega – Vrbnica
109	Lapovo – Kraljevo	Lapovo – Kraljevo
211	Ruma – Sabac – Rasp. Donja Borina – state border – (Zvornik Novi)	Ruma – Sabac
211	Ruma – Sabac – Rasp. Donja Borina – state border – (Zvornik Novi)	Station Sabac
212	(Platicevo) – Rasput. “1” – Rasput. “3” – (Stitar)	(Platicevo) – Rasput. “1” – Rasput. “3” – (Stitar) – Brasina
216	Smederevo – Mala Krsna	Smederevo – Mala Krsna
218	Mala Krsna – Bor – Rasputnica “2” – (Vrazognac)	Mala Krsna – Pozarevac – Zvzd – Majdanpek
218*	Mala Krsna – Bor – Rasputnica “2” – (Vrazognac)	Majdanpek – Leskovo – Vrazognac
219	(Nis) – Crveni Krst – Zajecar – Prahovo – state border	Crveni Krst – Knjazevac – Grljan – Zajecar – Vrazognac
219	(Nis) – Crveni Krst – Zajecar – Prahovo – state border	Trnavac – Tabakovac
219	(Nis) – Crveni Krst – Zajecar – Prahovo – state border	Tabakovac – Prahovo
202	Pancevo – Zrenjanin – Kikinda	Pancevo – Zrenjanin – Kikinda – Banatsko Milosevo – Senta
110	Subotica – Bogojevo – state border	Subotica – Bogojevo – state border Serbia-Croatia
207	Novi Sad – Odzaci – Bogojevo	Sajlovo – Futog – Bogojevo
208	(N.Sad) – Rasp.Sajlovo – R.Sancevi – Orlovat staj	Novi Sad Ranzirna – Sajlovo – Rimski Sancevi – Orlovat

The map below shows the sections included in the Project. The Project sections where more extensive maintenance activities will be performed are marked in blue.

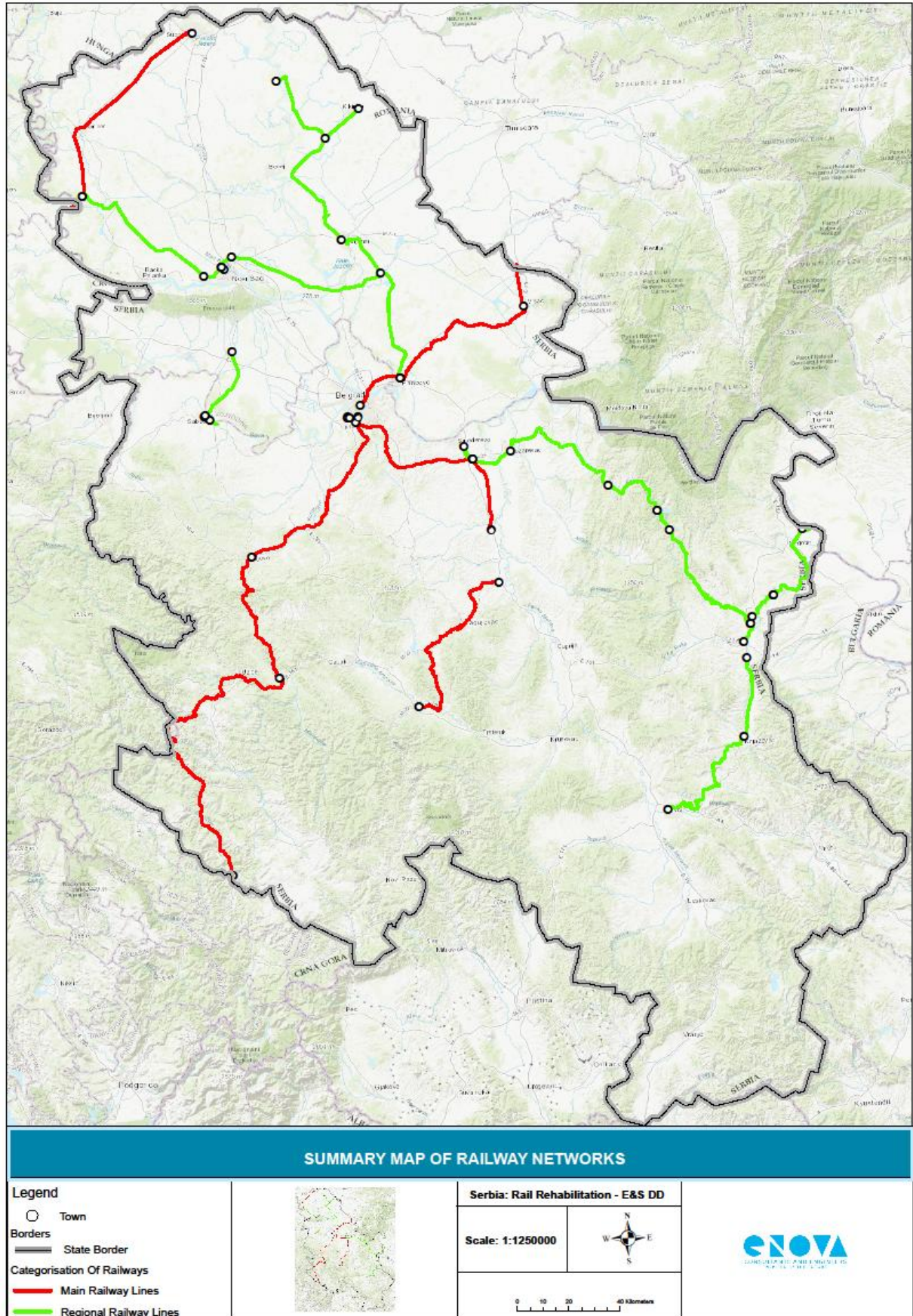
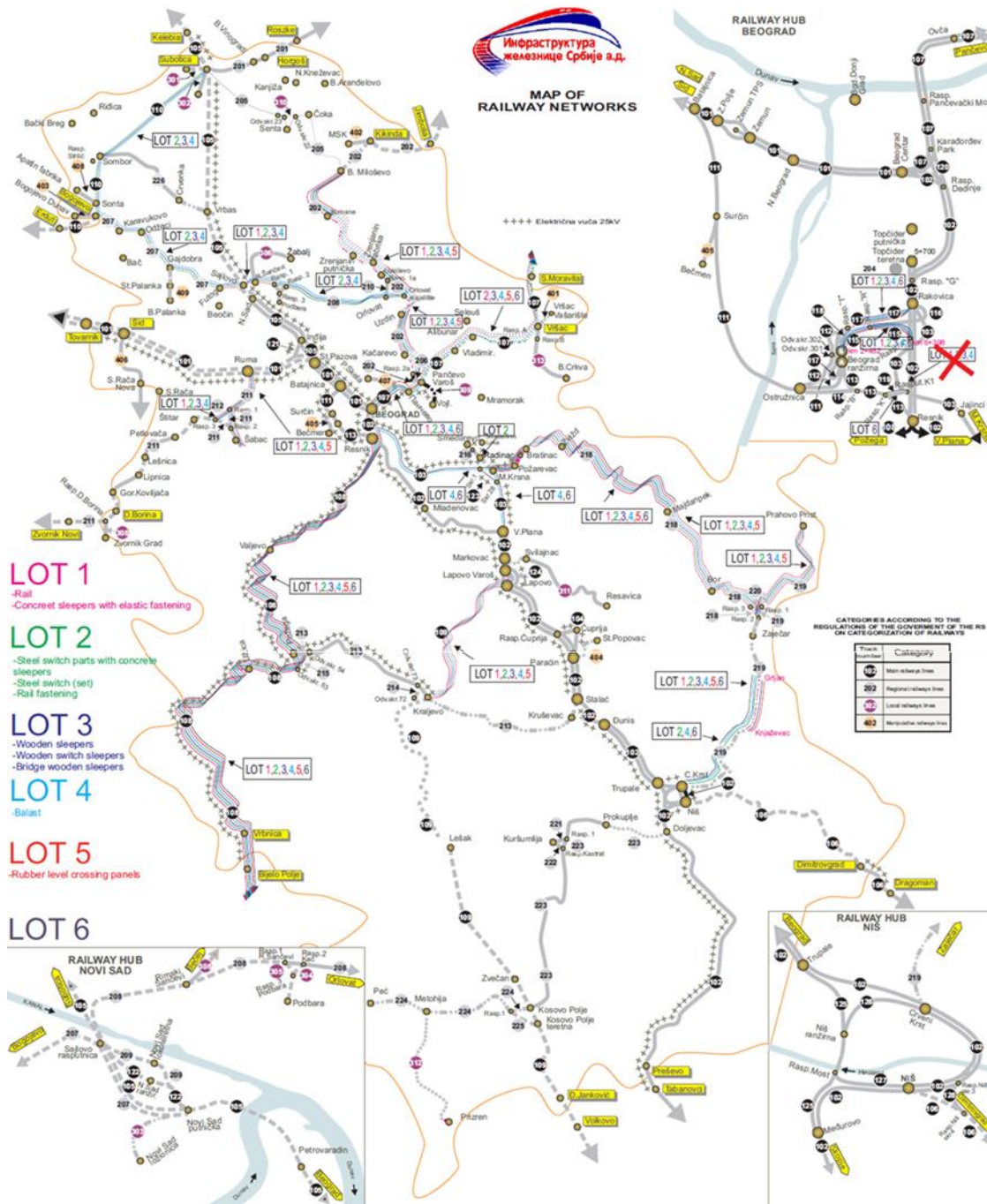


Figure 1: Railway network included in the Project scope (categorised by main and regional railway lines)

The map below shows the map of the railway network in Serbia with sections divided into lots.



The Project is **categorised as 'B'** in accordance with the EBRD Environmental & Social (ESP) Policy (2019)¹.

Implementation Arrangements. The Project will be implemented by the Serbian Railways Infrastructure (“SRI” or “Company”), in close cooperation with the Ministry of Construction, Transport and Infrastructure. A Project Implementation Unit (PIU) will be established within SRI.

E&S Benefits. The proposed Project is anticipated to yield several E&S benefits, including a decreased risk of derailments and accidents, thereby enhancing rail transportation safety and reducing environmental

¹ A project is categorised “B” when its potential environmental and/or social impacts are typically site-specific, and/or readily identified and addressed through effective mitigation measures.

contamination from hazardous material spills. It is also expected to improve community connectivity and mobility, leading to higher passenger satisfaction, while stimulating local economies through enhanced logistics and transportation of goods. Additionally, the Project aims to contribute to emission reduction by promoting more efficient train operations and potentially shifting from road to rail transport.

A more detailed description of the planned works is provided in the **Non-technical Summary** which is part of the Project's disclosure package together with this Stakeholder Engagement Plan.

1.2 Objectives and Scope of this Stakeholder Engagement Plan

This Stakeholder Engagement Plan (SEP) was developed by SRI in order to clearly communicate to all interested and affected parties the stakeholder engagement program which is to be implemented throughout the entire Project cycle.

The objective of this SEP is to improve and facilitate Project-related decision-making and create opportunities for active involvement of all stakeholders in a timely manner, and to provide possibilities for all stakeholders to voice their opinions and concerns that may influence Project decisions. The purpose of the SEP is, therefore, to enhance stakeholder engagement throughout the life cycle of the Project, and to carry out stakeholder engagement in line with Serbian legislation, as well as the requirements of EBRD.

This SEP is a live document that will be periodically updated by SRI as necessary to reflect key changes in Project activities or any new developments in the Project scope.

2 Regulatory Requirements for Stakeholder Engagement

2.1 Local Legislation Requirements

Serbia has specific laws with requirements regarding disclosure and transparency:

- > The **Law on Public Enterprises** (2016, with amendments in 2019) stipulates that information related to financial and other operations in public enterprises must be presented online, including annual reports, information and contacts, etc.
- > The **Law on Free Access to Information of Public Interest** (2004, last amended in 2021) states that public authorities are required to provide each person with the possibility of receiving and becoming acquainted with information of public interest, except in cases anticipated by law.
- > The **Law on Public Information and Media** (2014, last amended in 2016) stipulates that public information is free and is not subject to censorship, and that the public has the right and interest to be informed on issues of public interest.

It should be noted that regular railway maintenance activities are classified as activities that do not require approval from the competent authority. According to the *Law on Railway*, public railway infrastructure must be maintained to ensure safe and smooth railway traffic, adhering to safety and technical standards. Therefore, there are no specific permitting, information disclosure or public consultation requirements for such activities.

2.2 EBRD Requirements

In its ESP 2019, EBRD has defined a comprehensive set of specific Performance Requirements (PRs) that projects are expected to meet. [PR 10 \(Information Disclosure and Stakeholder Engagement\)](#) emphasises the importance of open and transparent engagement between the client, its workers, worker representatives, local communities and persons affected by the project and, where appropriate, other project stakeholders as an essential element of good international practice and corporate citizenship.

EBRD's PR 10 requirements can be summarised as follows:

- > The stakeholder engagement process involves **stakeholder identification and analysis**, engagement planning, information disclosure, meaningful consultation, implementation of a grievance mechanism, and ongoing reporting to relevant stakeholders. Engagement must begin early in the project development and continue throughout the project life cycle.
- > Clients must ensure that stakeholders have **access to timely, relevant and understandable information**, and that engagement is conducted in a culturally appropriate and inclusive manner, free from manipulation and coercion. The client will disclose relevant project information, in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account any specific needs of groups that may be differentially or disproportionately affected by the project or groups of the population with specific information needs appropriate. Throughout the life of the project, the client will continue to provide information to identified stakeholders on an ongoing basis.
- > The client will undertake **meaningful consultation**, based on the nature and scale of the project's adverse risks and impacts and the level of stakeholder interest.
- > To respond to stakeholders' concerns related to the project in a timely manner, the client will establish an **effective grievance mechanism** as early as possible in the project development process, to receive and facilitate resolution of stakeholders' concerns and grievances.

- > Clients are required to **develop and implement a SEP** that describes how engagement will be carried out, including the timing and methods of engagement, the information to be disclosed, disclosure language(s) and the type of information to be sought from stakeholders. The client will identify project-affected parties who, because of their particular circumstances, may be disadvantaged or vulnerable.

3 Stakeholder Engagement Program

3.1 Introduction

Communication and information channels have been designed in this SEP taking into account the specific needs of various stakeholder groups. SRI acknowledges the significance of meaningful and timely engagement with stakeholders to ensure the success of the Project. Through this engagement process, SRI aims to gather valuable feedback, comments, and suggestions from stakeholders to maximise local benefits.

There is a separate 'PIU Centre' within SRI that will coordinate and manage the implementation of this Project, including the implementation of this SEP (for contact information, see [Chapter 4 of this SEP](#)).

Contractors in charge of carrying out specific Project activities will also be required to implement the relevant provisions of this SEP. The grievance mechanism requirements will be laid out in the contracts that will be signed with the Contractors.

3.2 Project Stakeholders

Project stakeholders have been identified to address the different consultation requirements. Stakeholders include persons or groups that are:

- > directly and/or indirectly affected by the Project;
- > have certain interests in the Project and its activities; or
- > have the ability to affect the Project itself and its final outcome.

Stakeholder mapping was carried out during the development of this SEP based on discussions with SRI, field visits to the representative locations and by reviewing KMZ files of the route. Identified key Project stakeholders are listed below, whereas their specific interests/concerns and the planned methods of communication are detailed in [Chapter 3.6](#).

1) Local communities which may be directly affected by maintenance works

At most of the locations where railway maintenance works will be carried out, there are houses and settlements along the railway line. Some houses are at 5 or 10 m from the route. Some sensitive receptors such as community facilities are also present, though most not in immediate proximity to the railway line. However, potential risks to local communities living within 50 meters of the railway are not expected to be significant. It should be noted that maintenance activities will be limited to 10 hours per day, utilising specialised machinery, which means that disruptions to nearby residents and facilities will be minimised, and the efficiency of works will be maximised. The mechanical replacement of railway parts, with an expected daily output of approx. 300 meters, will ensure that works will not remain in one place for an extended period, making any impacts short-lived. All activities will take place on the existing railway, after which the railway will return to its normal function.

Noise and vibration effects on nearby houses and other facilities will depend on factors such as the work type, equipment and proximity to sensitive areas. These impacts are expected to be localised and short-term compared to regular train traffic, resulting in low overall impact on daily life.

2) Stakeholders with a specific interest in railway maintenance projects

This includes:

- > Srbija Voz AD - a state-owned company for rail passenger transport and the main operator of all activities related to rail passenger transport.

- > Srbija Cargo AD - a state-owned company for rail cargo transport and the main operator of all activities related to rail cargo transport.
- > Private companies which provide cargo transport services by rail.

3) Contractors for maintenance activities and their employees

The Contractors have not been selected yet but are a crucial stakeholder for the successful execution and delivery of the Project, ensuring safety and compliance during the maintenance activities.

It should be noted that any stakeholders not identified at this stage of the Project may directly contact SRI to make themselves and their needs known, and to facilitate the effective implementation of the SEP.

3.3 SRI`s Existing Communication Practices

SRI has an authorised person for communication with the public (PR Manager) who manages SRI's Media Centre. The PR manager and the Media Centre communicate through announcements, statements and information for the media, press conferences, organising media and promotional events and activities, and announcements on SRI's website. In addition, they are responsible for communication with the general public, from end users to government agencies, on all aspects of the Company's business, including this Project through written or direct communication activities.

Additionally, SRI regularly informs its service users (Srbija Voz, Srbija Cargo, and private cargo carriers) about planned maintenance activities to enable these users to timely their business operations. All information regarding temporary or permanent interruptions of SRI services is updated in real time and simultaneously forwarded to the users of SRI services.

3.4 Documents to be Disclosed

SRI will disclose the following documents as early as possible in the Project development process:

- > this Stakeholder Engagement Plan (SEP);
- > the Project Grievance Form (Appendix 1 of this SEP); and
- > the Non-technical Summary (NTS) of the Project.

The documents will be publicly available in Serbian and English language in electronic and printed forms at:

Name of organisation	Website	Address
SRI	https://www.infrazs.rs	Nemanjina 6, Belgrade, Serbia
Ministry of Construction, Transport and Infrastructure	https://www.mgsi.gov.rs	Nemanjina 22-26, Belgrade, Serbia

3.5 Disclosure of Information on Construction Works

Informing the public: SRI will place notifications with information on the location, extent, timing and duration of planned works and contact information for third-party concerns at least 15 days in advance at:

- > railway stations between which maintenance works will be carried out, and
- > on buildings of local self-government units or community offices with administrative jurisdiction over the area undergoing railway maintenance works.

Additionally, SRI will provide media with national frequency and/or daily newspapers distributed throughout the entire territory of the Republic of Serbia with a written statement containing information on the location, extent, timing and duration of planned works at least 15 days prior to the commencement of works.

Informing operators of rail passenger and/or cargo transport: SRI will notify Srbija Voz, Srbija Cargo and private companies for railway transport 7-10 days prior to the start of works in written form.

3.6 Engagement Objectives and Methods

A list of identified stakeholders and specific communication requirements are provided in the table below.

As noted previously, this list of stakeholders below may not be final, and that any stakeholders not identified at this stage of the Project may directly contact SRI to make themselves and their needs and interests known. The SEP will be updated accordingly by SRI. Suggestions for improvement of proposed communication methods are also welcome and can be sent to SRI which is open to feedback from stakeholders.

Table 1: Engagement Objectives and Methods

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
<p>Local communities which may be directly affected by maintenance activities:</p> <ul style="list-style-type: none"> > People living and working in the immediate vicinity of the railway line, i.e., those within 50 m > Population who uses community facilities (such as religious and educational institutions, sports and recreational facilities) located within 50 m of the railway line 	<p>Concerns related to maintenance works (vibration, noise, traffic, etc.)</p>	<ul style="list-style-type: none"> • Info-panels placed on construction sites • Notifications about works at: (i) railway stations between which maintenance works will be carried out, and (ii) on buildings of local self-government units or community offices with administrative jurisdiction over the area undergoing railway maintenance works • Project grievance mechanism 	<ul style="list-style-type: none"> • Project documents (SEP, NTS, Project Grievance Form) and comments matrix • Information on the extent, timing and duration of planned works
<p>Stakeholders with a specific interest in SRI maintenance projects, including:</p> <ul style="list-style-type: none"> > Srbija Voz > Srbija Cargo > Private companies for railway transport 	<p>Being notified about maintenance activities</p>	<ul style="list-style-type: none"> • Written notification about planned start of works 7-10 days in advance through official communication channels as defined by the agreements on cooperation and coordination signed between SRI and these stakeholders, including 	<ul style="list-style-type: none"> • Information on the extent, timing and duration of planned maintenance activities

Identified stakeholder	Specific issues or interests	Communication and engagement methods	Information to be disclosed
		through email, post and telephone	
Contractors for construction and their employees	Health and safety; labour and working conditions; environmental setting and impacts	<ul style="list-style-type: none"> • Information through contracting • Communication via SRI internal supervising engineers • Toolbox talks at construction sites on health and safety topics • Trainings and inductions before mobilisation • Workers' grievance mechanism 	<ul style="list-style-type: none"> • Work safety and health regulations • Information on workers' grievance mechanism

4 Grievance Management

Overview

SRI is striving to ensure that the maintenance activities will not result in adverse impacts for those living near the railway or for other potentially affected stakeholders. SRI understands that management of grievances is a vital component of stakeholder engagement and an important aspect of risk management for the Project. A Project-level grievance mechanism has been set up for affected communities as a process for receiving, evaluating and addressing grievances from affected communities. SRI will implement the grievance mechanism to ensure that it is responsive to any concerns and complaints particularly from affected stakeholders and communities.

Both SRI and the Contractors on site will accept complaints associated with the Project. At all times, complainants may seek other legal remedies in accordance with the legal framework of RoS, including formal judicial appeal.

SRI will monitor the way in which grievances are being handled and ensure they are properly addressed within deadlines specified within the mechanism presented below.

This chapter includes the following supporting appendices: Project Grievance Form (Appendix 1), template of the Grievance Registry (Appendix 2), and template of the Stakeholder Engagement Registry (Appendix 3).

The following sections of this chapter elaborate the Project grievance procedure and steps. A separate grievance mechanism is available for workers.

Submitting grievances

Any concerns can be brought to the attention of SRI verbally (personally or by telephone) or in writing by filling in the Project Grievance Form (by personal delivery, post or e-mail to the address/number given below), without any costs incurred to the complainant. Grievances may also be submitted anonymously or without the use of the form if preferred.

After the start of maintenance activities, the Project Grievance Form may also be submitted directly to the Contractor for construction works, which will forward any such received grievances to SRI without delay (within 24 hours) to allow SRI to further process the grievance/comment (i.e., record, acknowledge and respond to the grievance in the timeframes defined below). The Contractors are obliged to hand out the Project Grievance Form, explain the grievance mechanism to the concerned citizen(s) and forward the filled-in form to SRI.

Recording and acknowledging grievances

SRI will record all grievances in a Grievance Registry (format provided in Appendix 2), separate from the Stakeholder Engagement Registry (Appendix 3 of this SEP), which details interactions with communities and stakeholders.

All grievances will be recorded by SRI in the registry and assigned a number. Written and non-anonymous grievances will be acknowledged within 5 working days. To enable proper monitoring and evaluation, each grievance will be recorded in the registry with the following information:

- > description of grievance including an indication of the type (topic) of the grievance – such as grievances related to gender-based violence and harassment, grievances related to construction noise, grievances related to inadequate storage of construction materials and equipment, etc. –

- > to enable timely detection of most frequent incidents, ascertain trends and manage risks,
- > details about the complainant profile (gender, age, location and vulnerabilities if known), to understand who and where is most affected by potentially negative impacts of the Project,
- > date of receipt of grievance and when acknowledgement returned to the complainant,
- > description of actions taken (investigation, corrective measures, preventive measures), and
- > date of resolution and closure/provision of feedback to the complainant, including recording of level of satisfaction with the proposed resolution (see grievance close-out form below – Appendix 2).

Assisting complainants

If the grievance is vague and not clear enough, SRI will assist and provide counsel in formulating/redrafting the submission, in order for the grievance to become clearer, for purposes of an informed decision by SRI, in the best interests of persons affected by the Project and in consideration of the preferred resolution steps of the complainant.

Grievance resolution

SRI will make all reasonable efforts to address the complaint upon the acknowledgement of grievance. If SRI is not able to address the issues raised by immediate corrective action, a long-term corrective action will be identified. The complainant will be informed about the proposed corrective action and follow-up of corrective action within 10 working days upon the acknowledgement of grievance. Preventive actions will be identified and implemented with the aim of preventing recurrence of the same issue in the future; these will also be communicated to the complainant.

During the process of informing the complainant of the proposed action, SRI will validate complainant satisfaction through providing a grievance close-out form for the resolved grievance to be signed by the complainant (if the complainant agrees) and SRI to attest to their mutual satisfaction. SRI will make reasonable efforts to follow-up with the complainant to verify successful implementation of the action.

If SRI is not able to address the particular issue raised through the grievance mechanism or if action is not required, it will provide a detailed explanation/justification on why the issue was not addressed. The response will also contain an explanation on how the person/organisation that raised the complaint can proceed with the grievance in case the outcome is not satisfactory.

Contact information for grievances:

Serbian Railways Infrastructure - Project Implementation Centre

Email: infoenew@srbrail.rs

Tel: +381 11 361-48-11/ +381 11 361-67-22

Address: Nemanjina 6, 11000 Belgrade

Website: www.infrazs.rs

EBRD's Independent Project Accountability Mechanism

In addition to the Project-level mechanism managed by SRI, the EBRD's Independent Project Accountability Mechanism² (IPAM), as an independent last resort tool where project mechanism fails, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organisations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its

² Information about the IPAM process can be found at: <https://www.ebrd.com/what-we-do/independent-project-accountability-mechanism.html>

Access to Information Policy; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank.

5 Monitoring and Reporting

The results of the stakeholder engagement process will be included in Environmental and Social Reports to EBRD which will be prepared by SRI, summarising environmental and social impacts, health and safety performance, disclosure and consultation performance and implementation of the external grievance mechanism.

The Reports will include the following information:

- **Number and types (topics) of received community grievances** (e.g., grievances related to gender-based violence and harassment, grievances related to construction noise, grievances related to inadequate storage of construction materials and equipment, etc. – to enable timely detection of most frequent incidents) (with sex-aggregated data on complainants, if known) raised in the reporting period, with indication of opened, resolved and closed grievances and whether they have been closed out within the timeframes stated in the grievance mechanism;
- **Number and types of information disclosure and engagement activities** through all channels, with information on issues and concerns raised and information on how the issues raised were taken into consideration by the SRI.

SRI will be responsible for monitoring of all Project related stakeholder engagement activities, ensuring the fulfilment and updating of this SEP, and reporting to EBRD.

Appendix 3 of this SEP provides a template for tracking stakeholder engagement activities.

6 Appendixes

Appendix 1: Project Grievance Form

Reference Number	
Full name (optional) <ul style="list-style-type: none"> I wish to raise my grievance anonymously. I request that you do not disclose my identity without my consent. 	
Contact information Please mark how you wish to be contacted (mail, telephone, e-mail).	By Post: Please provide mailing address: _____ _____ By Telephone: _____ By E-mail _____
Preferred language of communication	<ul style="list-style-type: none"> Serbian English (if possible) Other _____
Description of Incident for Grievance	What happened? Where did it happen? Who did it happen to? What is the result of the problem?
Date of Incident / Grievance	<ul style="list-style-type: none"> One-time incident/grievance (date _____) Happened more than once (how many times? _____) On-going (currently experiencing problem)
What would you like to see happen?	

Signature: _____

Date: _____

Please return this form to:
Serbian Railways Infrastructure - Project Implementation Center
Email: to be added by SRI
Tel: +381 11 361-48-11/ +381 11 361-67-22
Address: Nemanjina 6, 11000 Belgrade
Website: www. infrazs.rs

Appendix 2: Grievance Registry – Template

Note: Any personal data will be processed in line with the RoS regulations on personal data protection.

	Name of complainant	Sex of complainant	Contact information	Date received	Date acknowledged	Grievance description	Proposed solution	Date of closure	Close-out form signed (Y/N)	Grievance follow-up	Recurrence (Y/N)	Action/ notes
1.	<i>Enter name or 'anonymous'</i>											
2.												
3.												

Appendix 3: Internal Stakeholder Engagement Registry – Template

Note: Any personal data will be processed in line with the RoS regulations on personal data protection.

	Stakeholder category and name	Type of engagement	Date of engagement	Key issues/concerns	Follow-up action agreed	Notes on progress
1.	<i>(E.g., affected resident, ...)</i>	<i>(E.g., official meeting, presentation, informal meeting...)</i>				
2.						
3.						