



Infrastructure of Serbian Railways

Resettlement Policy Framework

Rehabilitation and modernization of the railway line

Niš-Dimitrovgrad:

Section Sicevo - Dimitrovgrad

February 2025

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List of Abbreviations

EIB	European Investment Bank
EU	European Union
NES	National Employment Agency
PAP	Project Affected People
PR	Performance Requirement
RAP	Resettlement Action Plan
RS	Republic of Serbia
RPF	Resettlement Policy Framework
SRI	Infrastructure of Serbian Railways

1 Introduction

This Resettlement Policy Framework (hereinafter: RPF) was prepared to guide any involuntary resettlement that may occur as a result of implementation of the reconstruction and modernization of railway line Niš– Dimitrovgrad: for section Sicevo – Dimitrovgrad.

This RPF is an update of the one prepared in 2017 taking into account new national legislation and new EIB environmental and social standards. This document includes an overview of the national framework of the Republic of Serbia for expropriation/resettlement, applicable EIB's policies and best international practices in this field. The final objective of this RPF is that during this Project implementation, if any involuntary resettlement should be required, it does not rise severe economic and social risks to persons, families, or groups, to procure the mitigation of all related risks, and to provide a framework for compensation for impacts that cannot be avoided. If any resettlement should be required, it will be governed by principles and rules presented in this RPF.

RPF is prepared in accordance with the legal system, laws and procedures of RS, in conformity with EIB standard 6 and best international practice. RPF also provides the mandatory basis for developing site specific resettlement action plans (RAP), which will be developed as appropriate.

2 RPF objectives and principles

SRI as the implementing entity is expected to implement the Project in compliance with national as well as Lenders' requirements, specifically:

- Applicable legislation in Republic of Serbia,
- EIB Environmental and Social Standards¹, specifically Standard 6 (Involuntary Resettlement)

All these requirements are described in more detail in [Chapter 5 \(Key principles of Land Acquisition, Compensation and Assistance\)](#).

During implementation of the Project, the need for land acquisition and involuntary resettlement will occur as a result of civil works and other works foreseen under the Project. This document provides basic and binding principles to be applied. The principles guiding any current or future land acquisition for the Project, agreed by SRI as the key responsible entity, are as follows:

- If possible, all resettlement should have been avoided exploring viable alternatives during the Project design stage. If not possible, due to the fact that the project and associated works are being carried out on the existing alignment. all adverse effects should be rendered to the bare unavoidable minimum;
- When unavoidable adverse effects and social impact occurs, all loss of property shall be compensated at replacement costs and PAPs livelihood restored at least to the level before the Project implementation;
- PAPs will be assisted in all phases of the Project in their effort in livelihood restoration and living standards in real terms to level prior to Project implementation and resettlement;
- All resettlement needs to be managed in accordance with national laws, EIB E&S standard 6 accepted international best practices and the applicable principles of this document;
- Special support and concern in resettlement process and during complete Project implementation under this RPF is provided for affected vulnerable groups according to their specific vulnerability;
- During the Project implementation and resettlement cycle, stakeholders will be provided with clear information about grievance rights and procedures. All grievances will be taken into account during Project implementation and resettlement activities;
- All resettlement activities should be conceived as sustainable projects providing sufficient investment resources to enable principles and goals of resettlement defined by this RPF.
- The main objective of RPF is to define overarching principles, procedures, actions, organizational structures and capacity requirements during resettlement, if such should be

¹ Available at: <https://www.eib.org/en/publications/eib-environmental-and-social-standards>

required, and its impact attributable to Project implementation. It provides the framework for RAP under the Project. RPF specific objectives are to provide guidelines for classifying legal solutions in all events of involuntary resettlement, relocation and loss of assets, including legal and administrative procedures and compensation paid for loss of assets; compare them to EIB's resettlement policies and international best practices; and provide the way to bridge the gaps;

- identifying stakeholders and ways of their engagement in course of Project implementation;
- presenting PAPs eligibility criteria and compensation entitlement matrix according to type of loss assets;
- defining the process of identification and evaluation of affected assets and the value of compensation to replace the loss of assets;
- providing prompt and effective compensation at full replacement cost for loss of assets or access to assets;
- describing mitigation measures under this RPF, including procedures in order to minimize impacts on PAPs during Project implementation, including specific mitigation measures provided for vulnerable groups and women;
- defining grievance and complaint rights, process, bodies and procedures available to PAPs during the whole course of Project implementation, including feedback reporting;
- describing and providing directions to preparation of RAP and approval procedure, future RAP outlines and their implementation process;
- defining the need and extent of monitoring and evaluation of the resettlement process, including external monitoring and evaluation;
- If needed, RAP will be developed in accordance with the requirements of this RPF. The development of the RAP will include a socio-economic survey and census which will identify both formal and informal land/property users as well as vulnerable persons/households.
- Any vulnerable people affected by land acquisition will be assisted based on their specific needs, discussed with them during expropriation hearings;
- All available measures to identify owners and users of affected land and contact them will be undertaken, and only in exceptional cases where such measures did not yield results, temporary representatives will be appointed for them in the expropriation process.

Eligibility and the cut-off date

Eligibility and the cut-off date will be determined as follows:

- Eligibility of persons/legal entities with formal legal rights or rights that are recognizable under national legislation will be defined through legal instruments (registration in appropriate registries, results of inheritance procedures, concluded contracts and similar).
- Eligibility of persons with no legal rights or claims to the structures they occupy (users of structures with no legal basis) and persons affected by the relocation of a business will be determined based on their presence in the Project affected area, at the time of the census and socio-economic survey which will be the cut-off date.
- Eligibility of persons with no legal rights or claims to the land they occupy (informal users of affected land), will be determined based on their presence in the Project affected area, at the time of the census and socio-economic survey which will be the cut-off date. The cut-off date will be formally announced through local media and via personal notifications during census/surveys.
- Compensation for any affected assets will be provided at full replacement cost, regardless of whether they are formally registered or not.
- In case of physical displacement, whenever feasible, the promoter shall offer all PAPs an informed choice of either compensation in kind (land-for-land; house-for-house; shop-for-shop) or monetary compensation at full replacement cost. The promoter shall respect the choice stated by the PAPs.
- All compensation and assistance will be provided equally to men and women;
- A grievance mechanism is implemented through which all affected people can submit their complaints and grievances in relation to compensation and resettlement and expect a timely answer;
- Monitoring of all compensation, resettlement and livelihood restoration activities will be regularly carried out and reported to EIB.

3 Brief Project Description

3.1 Project background

The existing railway line connecting Nis to the Bulgarian border has a total length of 104km while the section between Nis and Dimitrovgrad is approximately 97km long. Section Sicevo (Prosek) to Dimitrovgrad Station is approximately 82km long.

The Nis-Dimitrovgrad railway line is part of the Xc branch of the core network of the South East Europe Transport Observatory (SEETO) Corridor X, a pan-European corridor passing through Serbia. The Xc branch connects Nis city with Dimitrovgrad and the Bulgarian border.

The railway line between Nis and Dimitrovgrad is also part of a corridor that links Central Europe to Bulgaria and Turkey through Croatia and Serbia. It is considered an alternative to the Rhine-Danube core network corridor of the Trans-European Transport Network (TEN-T). The TEN-T is an initiative for the development of a new network of roads, railway lines, inland waterways, and airports across Europe.

Furthermore, the line is part of the Orient/East Mediterranean corridor, which connects Salzburg in Austria to Thessaloniki in Greece. Approximately 872km of the corridor is located in Serbia, accounting for an estimated 23% of the country's total railway network.

The Nis-Dimitrovgrad line is the only section of Corridor X that is not electrified. Non-electrification and category D3 weight limits are this section's main causes of bottlenecks. The ageing signaling and rail control system was commissioned more than 50 years ago, and requires replacement as it limits travel speeds to 30km/h to 50km/h.

3.2 Project Description

The Nis- Dimitrovgrad Rail Modernization Project, hereafter the "Project", consists of the reconstruction and modernization of the existing single-track railway line section Sicevo (Prosek)– Dimitrovgrad, including rehabilitation and modernization of infrastructure, electrification and modernization of signaling/telecommunications, and construction of single-track bypass (including all sub-systems) in the North of the City of Nis. In particular, it encompasses the following components:

1. **Component 1:** Section Sicevo (Prosek)-Dimitrovgrad (approx. length 82.5 km), reconstruction and modernization (civil works and track, preparatory works for electrification, signaling and telecommunications). This component has been amended to include electrification works for this section together with the Civil Works in order to reduce the number of interfacing contracts;
2. **Component 2:** North by-pass of the City of Nis, construction of new single-track electrified line and reconstruction of tracks and electrification of existing railway sections. This component has been amended to include electrification works for this section together with the Civil Works to reduce the number of interfaces;
3. **Component 3:** Modernization of signaling and telecommunication systems for the entire Project (including implementation of ETCS-2 and GSM-R);
4. **Component 4:** Support to the Project Implementation Unit (PIU hereafter) in a form of technical assistance and supervision of works.

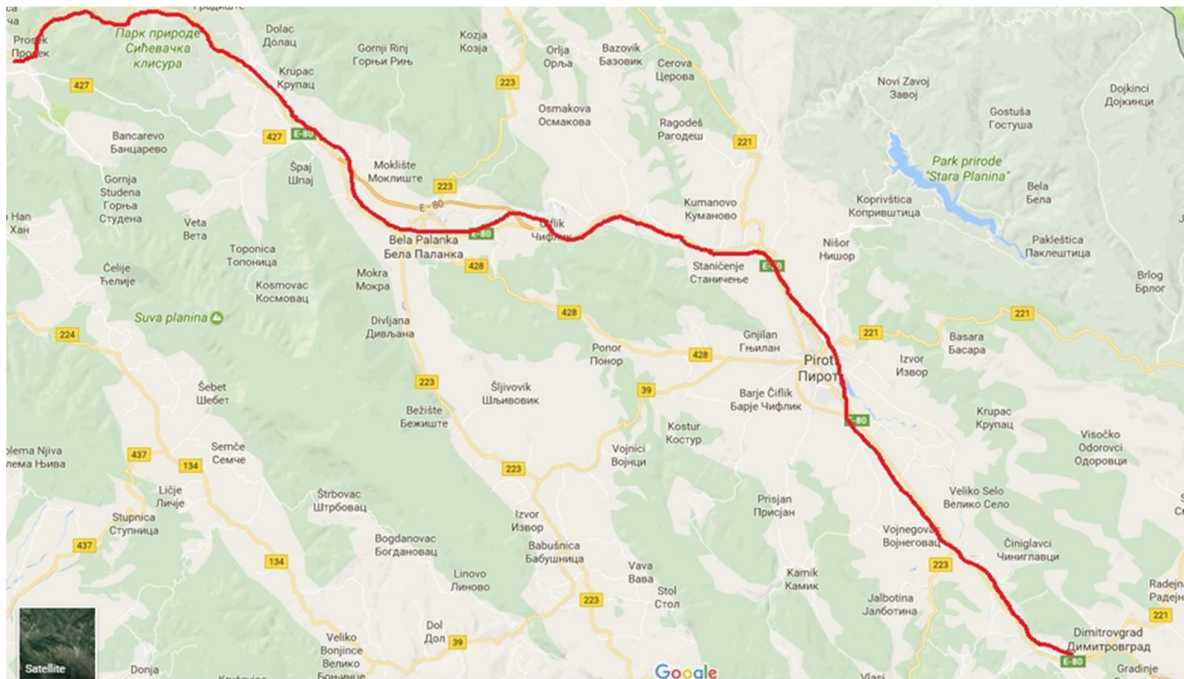


Figure 1 GEOGRAPHICAL OVERVIEW OF SCOPE

The European Investment Bank is providing finance to the Republic of Serbia (RoS) for the benefit of Serbian Railways Infrastructure (SRI).

The project shall be financed from EIB loan, WBIF Grants, RS Budget.

3.3 Scope of land acquisition and resettlement

The scope of this document is limited to Component 1: from Section Sicevo (Prosek) km 14+239.17 to Dimitrovgrad Station entry at km 96+700, and works included in Component 3 as far as they concern section Sicevo (Prosek)-Dimitrovgrad **Component 1** (section Section Sicevo (Prosek) km 14+239.17 to Dimitrovgrad Station entry at km 96+700"): reconstruction and modernization of civil works and track, construction of the contact network and electrical installations, and preparatory works for Component 3 (signaling and telecommunication).

This component has been amended to include electrification works for this section together with the civil works to reduce the number of interfacing contracts.

On the existing section Sicevo-Dimitrovgrad the works will mostly stay within the existing right of way (railway land), except in areas predicted for construction of new electric traction substations (ETS) Bela Palanka and Sukovo and in areas of buildings affected by the track extension in Ostrovica (within the City of Niš) and Municipality of Bela Palanka, where there will be no need for resettlement, but expropriation of some private land might be necessary

The only household to be resettled is located in Pirot. The building belongs to SRI and one of the members of the household is an SRI employee. This case is described in detail in Section 9 below.

There will be no need for resettlement at the stations of Ostrovica and Bela Palanka.

The expropriation of some private land might be necessary.

Please note that according to the SRI analysis of the Project area, there are **no** private-owned buildings on the territory covered by the project, but only private-owned land plots (at this stage, and according to current estimates and available information, there are 16 buildings to be demolished and another 8

buildings for which some other and appropriate technical solutions will be proposed (such as fences and barriers, walls, etc).

The total area of land for expropriation with exact number of affected plots (which is expected to be minor) will be determined once the Preliminary Design (design of the land expropriation, namely) is completed.

Current state (at the time of writing the document)

The Contractor has completed a detailed analysis of the expropriation requirements for the first three subsections based on the area required for the construction activities.

The subsections are split as follows:

1. Sub-section 1 from Stanicenje to Pirot km 64+152 to km 71+600
2. Sub-section 2 from Pirot to Sukovo km 73+300 – km 85+650
3. Sub-section no 3: station Pirot km 71+600 – km 73+300, L=1,7km, station Sukovo km 85+650 – km 86+550, L=0,9km, open line Sukovo – Dimitrovgrad km 86
4. Sub-section no 4: Dolac – Crvena Reka, station Crvena Reka, Crvena Reka – Bela Palanka, station Bela Palanka, Bela Palanka – Čiflik, station Čiflik, Čiflik – Staničenje and station to be updated once detailed design is completed by the Contractor
5. Sub-section no 5: Prosek – Sićevo, station Sićevo, Sićevo – Ostrovica, station Ostrovica, Ostrovica – Dolac and station Dolac to be updated once detailed design is completed by the Contractor

The results for the first three sections are presented in the tables below.

Table 1: type of ownership and total area of acquired parcels

Ownership	Number of Entirely Acquired Parcels	Number of Partially Acquired Parcels	Total Area of Acquired Parcels(m ²)
In Private Ownership	1	29	2519
In Public Ownership	6	30	5048

Table 2: type of ownership and total area of acquired parcels per municipality

Municipality	Ownership	Number of Entirely Acquired Parcels	Number of Partially Acquired Parcels	Total Area of Acquired Parcels (m ²)
Pirot	Private	1	24	2476
	Public	5	23	4014
Dimitrovgrad	Private	0	5	43
	Public	1	7	1034
Total:		7	59	7567

4 Preliminary Assessment of Project Impacts

4.1 Overview

In general, project impacts associated with land acquisition and restrictions on land use are expected to occur in different phases of projects:

- **Before construction**, certain land and associated assets may be acquired for Project construction purposes leading to physical and economic displacement. Such assets may be acquired within the expropriation zone to be determined based on the railway protection zone defined by the law, in which no structures or other assets (trees, crops, etc.) are allowed. The width of the railway protection zone is 8m from the axis of the outermost tracks. In inhabited areas, the width of the railway protection zone can be reduced to 6m from the axis of the outermost tracks.

Note: Within the expropriation zone, there are also expected to be plots and facilities that already belong to SRI but may be used formally or informally by individuals.

- **During construction**, some additional land often is needed for temporarily construction camps, material laydown areas, storage of topsoil and excavated materials, etc.
- **During the operational phase**, according to the Railway Law, certain land use will be restricted outside of the railway protection zone mentioned above (in which all land will be expropriated and will become property of SRI). The Railway Law² defines the following zones:
 - Infrastructure zone with a width of 25m from the axis of the outermost tracks (this includes the railway protection zone) – new structures may be constructed only with the fulfilment of two conditions:
 - that the construction of such structures is foreseen by the urban plan of the relevant unit of local self-government (municipality)
 - that all conditions and approvals provided by SRI are fulfilled (a request for approval has to be submitted by the person intending to construct)
 - Fire safety zone (forest land) with a width of 18m from the axis of the outermost tracks (this includes the railway protection zone) – the owners of the land are obliged to regularly remove trees, plants and leaves
 - Fire safety zone (agricultural land) with a width of 13m from the axis of the outermost tracks (this includes the railway protection zone) – the owners of the land are obliged to remove mature crops in a timely manner and, if needed, undertake other fire protection measures.

4.2 Summary of possible impacts

At the time of developing this RPF it is not possible to fully define exactly how many assets or people will be affected in either of these phases, however the analysis carried out by SRI and the Contractor confirm take of private land. However, it is reasonable to consider the possibility that Project might lead to the following impacts:

Table 1 Summary of possible Project impacts

Type of potential loss / impact
Permanent loss of privately owned (agricultural, forest, residential, commercial or any other) land
Permanent loss of access to public land for agriculture
Loss of annual crops or plants
Loss of fruit trees / vines
Loss of forest trees
Loss of any improvements made to the land (e.g. irrigation system, water well)
Permanent loss of residence (house or apartment) owned by SRI and physical displacement of households living in them
Permanent loss of (or access to) formal (registered) or informal non-residential structure/premises (shed, garage, business premises, well, etc.)
Relocation of formal or informal businesses and interruption in employment for any engaged workers

² Official Gazette of the RS, no. 41/2018

Obligation to request approval from SRI in the process of obtaining a construction permit for construction of new structures on privately owned land within the infrastructure zone
Loss of income or livelihood associated with either of the above losses (economic displacement)
Disproportionate/more difficult impact, as a result of vulnerability
Permanent loss of municipally owned structures – note: affected municipalities are entitled to compensation for their affected land and assets (municipally owned), as registered in the Cadastre, however only in the event that they acquired the properties through a financial transaction (they bought the property) and have proof to substantiate the claim.
Permanent loss of community infrastructure

Appropriate entitlements for people affected by all of these listed impacts are presented in the Entitlements Matrix (provided in [Chapter 7](#)).

4.3 Vulnerable people/households

Some individuals or groups are considered more vulnerable than others and, if affected by the Project, will require the implementation of special livelihood restoration and/or assistance measures. Such groups might include:

- persons residing informally in structures affected by the Project, with no other property or place of residence
- informal users of affected land who have no sources of income or assets of their own, persons who depend on the affected land for incomes/livelihoods and it is the only land they own or use
- elderly single headed households, single parent households, households with multiple members, etc. who have to be physically re-located
- persons who will be affected by physical and/or economic displacement, whose socio-economic status is low, for example beneficiaries of social welfare
- illiterate persons who may have difficulties accessing information about the Project and land acquisition or understanding contracts and other important documents, etc.
- any household/community/settlement that for different reasons might have reduced access to physical, economic, social, natural, human capital, including ethnic minority groups.

If SRI/Supervision Engineer identifies vulnerable individuals and households during the construction works, SRI will cooperate with adequate institutions depending on the situation, such as Centres for Social welfare and Health care centres, in order to ensure adequate assistance to the vulnerable persons.

The SRI will be responsible for disseminating information about the grievance mechanism both on-site and within local communities. Additionally, the Community Liaison Officers (CLOs) will assist in the implementation of the grievance mechanism, ensuring it is effectively communicated and accessible. However, the identification of vulnerable individuals and households will be managed by SRI/ Supervision Engineer before the commencement of construction works.

5 Key Principles of Land Acquisition, Compensation and Assistance

During implementation of the Project, the need for land acquisition and involuntary resettlement will occur as a result of civil works and other works foreseen under the Project. This document provides basic and binding principles to be applied. The principles guiding any current or future land acquisition for the Project, agreed by SRI as the key responsible entity, are as follows:

- If possible, all resettlement should have been avoided exploring viable alternatives during the Project design stage. If not possible, due to the fact that the project and associated works are being carried out on the existing alignment. all adverse effects should be rendered to the bare unavoidable minimum;
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- PAPs will be assisted in all phases of the Project in their effort in livelihood restoration and living standards in real terms to level prior to Project implementation and resettlement;

- All resettlement needs to be managed in accordance with national laws, EIB E&S standard 6 accepted international best practices and the applicable principles of this document;
- Special support and concern in resettlement process and during complete Project implementation under this RPF is provided for affected vulnerable groups according to their specific vulnerability;
- During the Project implementation and resettlement cycle, stakeholders will be provided with clear information about grievance rights and procedures. All grievances will be taken into account during Project implementation and resettlement activities;
- All resettlement activities should be conceived as sustainable projects providing sufficient investment resources to enable principles and goals of resettlement defined by this RPF.

The main objective of RPF is to define overarching principles, procedures, actions, organizational structures and capacity requirements during resettlement, if such should be required, and its impact attributable to Project implementation. It provides the framework for RAP under the Project. RPF specific objectives are to provide guidelines for

- classifying legal solutions in all events of involuntary resettlement, relocation and loss of assets, including legal and administrative procedures and compensation paid for loss of assets; compare them to EIB's resettlement policies and international best practices; and provide the way to bridge the gaps;
- identifying stakeholders and ways of their engagement in course of Project implementation;
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- defining the need and extent of monitoring and evaluation of the resettlement process, including external monitoring and evaluation;
- If needed, RAP will be developed in accordance with the requirements of this RPF. The development of the RAP will include a socio-economic survey and census which will identify both formal and informal land/property users as well as vulnerable persons/households.
- Any vulnerable people affected by land acquisition will be assisted based on their specific needs, discussed with them during expropriation hearings;
- All available measures to **identify owners and users** of affected land and contact them will be undertaken, and only in exceptional cases where such measures did not yield results, temporary representatives will be appointed for them in the expropriation process.

5.1 Eligibility and the cut-off date

1. **Eligibility and the cut-off date** will be determined as follows:
 - Eligibility of persons/legal entities with formal legal rights or rights that are recognisable under national legislation will be defined through legal instruments (registration in appropriate registries, results of inheritance procedures, concluded contracts and similar).
 - Eligibility of persons with no legal rights or claims to the structures they occupy (users of structures with no legal basis) and persons affected by the relocation of a business will be determined based on their presence in the Project affected area, at the time of the census and socio-economic survey which will be the cut-off date.
 - Eligibility of persons with no legal rights or claims to the land they occupy (informal users of affected land), will be determined based on their presence in the Project affected area, at the time of the census and socio-economic survey which will be the cut-off date. The cut-off date will be formally announced through local media and via personal notifications during census/surveys.
 - Compensation for any affected assets will be provided at full replacement cost, regardless of whether they are formally registered or not.

2. **In case of physical displacement**, whenever feasible, the promoter shall offer all PAPs an informed choice of either compensation in kind (land-for-land; house-for-house; shop-for-shop) or monetary compensation at full replacement cost. The promoter shall respect the choice stated by the PAPs.
3. All compensation and assistance will be provided **equally to men and women**;
4. A **grievance mechanism** is implemented through which all affected people can submit their complaints and grievances in relation to compensation and resettlement and expect a timely answer;
5. **Monitoring** of all compensation, resettlement and livelihood restoration activities will be regularly carried out and reported to EIB.

6 Legal Framework

6.1 Applicable Legislation of the Republic of Serbia

6.1.1 Constitution of the Republic of Serbia

The Constitution of the Republic of Serbia was approved in the constitutional referendum held on the October 28-29, 2006 and was officially proclaimed by the National Assembly of Serbia on November 8, 2006. Constitution of RS proclaims the rule of law and social justice, principles of civil democracy, human and minority rights and freedoms, and commitment to European principles and values.

Article 58 generally acknowledges guarantees of peaceful tenure of a person's own property and other property rights acquired by law. It states that right of property may be revoked or restricted only in public interest established by law and with compensation which cannot be less than market value. It is important to note that the Constitution of RS prohibits the payment of compensation less than the "market value", but allows the payment over the established market value, which is an important provision for bridging gaps between Serbian laws and EIB resettlement policies, as will be presented later in this document. The provisions of the Constitution also do not differ property (buildings etc.) constructed without a construction permit, a practice that became common during last 30 years in RS. The Constitution further proclaims that all human rights (including the right of property) and minority rights guaranteed by the Constitution shall be implemented directly.

6.1.2 The Law on foundations of property law relations (i.e. the Law on property)

The Law on foundations of property law relations ("Official Gazette of the SFRY", No. 6/80, 36/90, "Official Gazette of the FRY", No. 29/96 and "Official Gazette of the RS", No.115/2005) stipulates fundamental provisions of property relations, including ownership rights substance, subjects of ownership rights, co-ownership and joint ownership rights, acquiring the right of ownership, right on yields emanating from owned thing, possession rights, ownership acquired by adverse possession, ownership relations deriving in situations when structures was built on someone else's land, protection of ownership rights, protection of possession, cessation of ownership rights, etc.

6.1.3 The Law on Planning and Construction

The Law on planning and construction ("Official Gazette of RS", No. 72/2009, 81/2009 - correction, 64/2010 - decision of the CC, 24/2011, 121/2012, 42/2013 - decision of the CC, 50/2013 - decision of the CC, 98/2013 - decision of the CC, 132/2014, 145/2014, 83/2018, 31/2019, 37/2019 - other act and 9/2020, 52/2021 and 62/2023) regulates: conditions and modalities of spatial planning and development, development of general and detailed regulation plans, development and use of construction land and the construction of facilities, predominant use of land when the land has multiple uses, public use of land and other issues of significance in the development of space, landscaping and use of construction land and the construction of facilities. The Law also encompasses principles of green building, emphasizing the planning, design, construction, and maintenance of structures to reduce greenhouse gas emissions. It mandates the use of environmentally certified construction materials and equipment, efficient resource utilization, and the adoption of circular models for waste management. The Law promotes the integration of renewable energy sources in construction projects, aiming to enhance the quality of life for inhabitants, protect the environment, and advance overall sustainability.

This law also specifies procedures for the issuance of location conditions, building permits, notices of works, occupancy permits, and the fulfilment of conditions for design, including the connection of a facility to the infrastructure network. It further addresses the acquisition of legal instruments and other documents

from relevant public authorities required for construction processes, such as obtaining site location conditions, building permits, and occupancy permits within their jurisdiction. Additionally, the law covers the provision of conditions for infrastructure network connection and the registration of title to the constructed facility, as well as the designation of a house number through a unified procedure.

The two laws which most directly apply to land acquisition which will be carried out for the Project are:

6.1.4 Expropriation Law

The main law regulation acquisition of land and assets in the public interest in Serbia is the Expropriation Law³. It focuses on properties and assets which may be expropriated and restrictions which may be placed on property rights, in the public interest, which is established in accordance with the law.

Public interest is established either through a separate law or by a decision of the Government of Serbia. Following establishment of public interest, an expropriation proposal is submitted by the Beneficiary of Expropriation (in the case of this Project, SRI) to the property administration in the relevant municipality (property administration) together with a set of accompanying documents, including proof that funds needed for compensation are available.

Owners of affected properties are individually invited to a hearing by the property administration and notified about the submission of the expropriation proposal. If the documentation is in order, a decision on expropriation (first degree) is passed by the municipal property administration. The affected owners can submit an administrative appeal to the Ministry of Finance, which decides in the second degree, after which the decision becomes final. If there is no further (judicial) appeal, the expropriation decision also becomes legally binding. However, the affected owner can choose to submit a judicial appeal to the relevant administrative court, after whose ruling the decision on expropriation becomes legally binding.

When the decision on expropriation becomes legally binding, another hearing must be held by the municipal property administration to discuss and determine the amount of compensation for each affected owner. In case an agreement on the level of compensation (including the timing of payment and the need to vacate the affected property) is not reached within two months of the decision on expropriation becoming legally binding, the case is referred to the courts to decide. The Beneficiary of Expropriation proceeds with the payment of compensation or provision of replacement properties, after the signing of a compensation agreement or the decision on compensation becoming legally binding.

Some of the relevant key characteristics of the Expropriation Law are as follows:

- The Law focuses on providing compensation for any affected properties and assets, rather than on addressing further impacts of land acquisition/restrictions on land use, i.e. physical and economic displacement. It indirectly covers physical and economic displacement, but only for affected people who have formal legal rights or rights/claims that are recognisable under national law.
- It encourages amicable agreements on expropriation and compensation, however always after proclamation of public interest, rendering land acquisition 'involuntary'.
- It requires the provision of compensation which is determined in accordance with the prevailing market price of the affected property/asset.
- It foresees the possibility of providing increased cash compensation for persons whose sources of livelihoods are adversely affected. Vulnerability, in that regard, is determined by taking into account the number of household members, the number of household members capable of earning a living or who are employed, the health status of household members, the monthly income of the household.
- The Law defines a cut-off date for determining the value of affected properties, and it is the date of notification of the owner that an expropriation proposal has been submitted, meaning that all investments into properties made after this date will not be considered for compensation in the valuation process (unless needed for regular maintenance and use). In practice, certified appraisers create an inventory of affected assets during their site visit and provide a valuation of all of these affected assets, effectively causing the cut-off date to be the date of the site visit of certified appraisers.
- It enables owners whose assets and land are partially acquired to request expropriation of all the remaining land and assets (orphan land), if partial expropriation would negatively affect their economic situation or make the remaining part of the property useless or difficult to use. This

³ Official Gazette of the RS 53/95, 16/01 – Federal Constitutional Court decision, 20/09, 55/13 – Constitutional Court decision and 106/16)

request can be made even after the completion of expropriation and up to two years following completion of construction works.

- It enables compensation for land and residential and business structures to be provided in kind (replacement properties) at the request of the affected person.
- It allows for the Beneficiary of Expropriation to acquire the right of accessing the land/property, under certain circumstances (if the decision on expropriation is final), even if compensation has not been executed (e.g., affected person seeks higher compensation from the court).
- It provides administrative and judicial remedies for disputing expropriation and the amount of compensation provided for affected assets.

Solutions for addressing physical and economic displacement can be sought through cooperation with various government and non-government service providers, such as municipal Centres for Social Welfare which can provide assistance to vulnerable people, under relevant social welfare laws or the National Employment Service (NES) of the RS, which can provide affected people with assistance for employment and training, with the aim of livelihood restoration.

6.1.5 Law on Special Procedures for the Implementation of the Project of Construction and Reconstruction of Line Infrastructure Structures of Particular Importance to the Republic of Serbia

Specific law regulating implementation of linear projects of particular importance to the Republic of Serbia was passed in 2020, and part of this law pertains to land acquisition.

In the field of land acquisition, the Law aims to expedite the expropriation process, and enable a more efficient execution of it, since it shortens deadlines under the Expropriation Law for affected persons as well as included institutions.

Provisions of this Law most relevant to this Project are as follows:

- Public interest for expropriation shall last until the issuance of occupancy permit for newly constructed infrastructure (does not have to be renewed); if additional land (land previously not within the expropriation zone) has been affected during construction, procedure for settlement (agreement) conclusion with the land owner is initiated, without the initiation of expropriation;
- It is prescribed by Law that during the expropriation of building land, on which an informal structure is built (for which the legalization process has not been carried out), structure owner (person owning the land) is entitled to compensation in the amount of building value of that structure.
- If the residence of the registered property owner cannot be determined (and he/she does not have a legal representative) or if the registered owner passed away, and probate proceedings were not carried out, municipal administration is entitled to appoint a temporary representative. An appeal on the expropriation decision may be declared, but this does not prevent the issuance of construction permit and notification of works. It should be mentioned that the temporary representative does not have the right to conclude a compensation agreement on behalf of the owner (or their inheritors); their rights to seek compensation never expire, and they can do so even years after the expropriation had been completed.
- Market value of the affected land is determined by the Tax Administration on the basis of the last registered purchase transaction for the similar land in the vicinity of the affected land.

The Law enables the Tax Administration to align the amounts of the estimation with other amounts used for similar land affected by linear projects in the neighboring municipalities. Compensation for structures and other assets located on the land shall be determined according to the provisions of the Expropriation Law.

6.1.6 Law on Social Protection

The Social Protection Law of Serbia contains provisions regulating the organization, financing, and delivery of social services to citizens. The Republic of Serbia, autonomous province, and local self-government unit ensure the performing of activities in the field of social protection within its rights and

obligations determined by the Constitution and law by establishing institutions or entrusting the performance of these activities to other legal and natural persons. Primarily, the law defines the rights to social protection, such as financial assistance, in-kind aid, and various support services for vulnerable population categories. It also stipulates the obligations of the state and local governments to enforce these rights, including standards and criteria for providing social services. The Law outlines mechanisms for monitoring and quality control of services to ensure their efficiency and compliance with regulations. Additionally, the Law emphasizes the importance of user involvement in the planning and delivery of social services and promotes the principle of individualization and the adaptation of services to the specific needs of users. This law is implemented by Centres for Social work.

The Law on Social Protection of Serbia is based on several key principles, which also represent the rights of social service users:

- The principle of availability - Social services must be accessible to all citizens without discrimination.
- The principle of equality - All users have the right to equal protection and access to services, regardless of their personal characteristics.
- The principle of individualization - Services are tailored to the specific needs of each individual, aiming to achieve the best possible outcome.
- The principle of respect for human rights and dignity - The provision of services must respect the human dignity and fundamental rights of users.
- The principle of solidarity - Solidarity within the community is promoted, where all members of society help those in need.

The Law defines socially vulnerable individuals as those who, due to unfavourable personal, economic, social, or other circumstances, are unable to meet their basic life needs or exercise their rights without societal assistance. These circumstances include, but are not limited to:

- Lack of income - Individuals or families without sufficient financial resources for living.
 - Disability - People with physical or mental disabilities who require special assistance and support.
 - Aging - Elderly people who lack adequate support or income.
 - Family or social dysfunction - Individuals from families with disrupted relationships or those exposed to violence.
 - Homelessness - Individuals without a permanent residence or at risk of losing their home.
- According to the Law, these individuals have the right to various forms of assistance and support in accordance with the law, to ensure they achieve a minimum standard of living and social inclusion.

The rights of social protection beneficiaries include the right to be informed about available services, the right to complain and seek protection in case of dissatisfaction with the services, the right to confidentiality and privacy protection, and the right to participate in decision-making processes regarding their social status and support.

In addition to this Law, the following are also in force in the Republic of Serbia:

- **The Law on Health Care**, which ensures access to healthcare services and provides health protection for all citizens, with a special focus on vulnerable groups.
- **The Law on Social Housing**, which regulates the right to social housing for vulnerable groups, including the elderly, people with disabilities, and single parents, to ensure adequate accommodation. This law aims to provide decent housing conditions for the most vulnerable citizens, improve their living standards, and contribute to social inclusion.
- **The Law on Professional Rehabilitation and Employment of Persons with Disabilities**, which prescribes measures for professional rehabilitation, employment, and working conditions for people with disabilities, aiming to facilitate their inclusion in the labour market.

6.2 Eligibility, evaluation and entitlement

6.2.1 Persons eligible for compensation

Any person negatively affected by the project is eligible for compensation, livelihood restoration and/or other resettlement assistance. According to this RPF, the following persons are entitled for expropriation compensation:

- PAPs with formal title ownership on the land, that lose all or part of their land;
- PAPs with formal title ownership, who have buildings with or without building permissions on the land to be expropriated;
- PAPs with formal title over businesses that are affected by the loss of all or part of the land on which businesses are located;
- PAPs that are affected by the loss of all or part of the land used for agriculture;
- PAPs with formal title of tenancy on private or public land/building.
- PAPs with formal title over land that will be needed during construction on a temporary basis;
- PAPs whose access to their buildings is affected by the Project;
- PAPs without formal title on affected land or businesses but their livelihoods are directly dependent on the affected land or businesses (e.g., those working on affected agricultural land or working in the affected businesses);
- PAPs without formal title of ownership or use but who have established usage of public or private land by investing in immovable objects, crops, woods, trees, fruit bearing trees, vineyards, the age of crops, and the time needed to reproduce them;
- PAPs without any formal or recognizable legal right to the property they are occupying prior to the cut-off date;
- Vulnerable people and groups which are affected by the Project;
- PAP's whose losses cannot be determined or foreseen at this stage of the Project and
- Any affected community facility.

6.3 Applicable EIB Requirements

Along with the obligation for SRI to follow the national legislative requirements, it also has to fulfil the requirements of EIB, which will participate in the financing of the Project. As mentioned previously, the **relevant requirements** which need to be fulfilled is EIB Environmental and Social Standards, specifically **Standard 6 (Involuntary Resettlement)**.

This Standard defines involuntary resettlement as displacement that occurs as a direct result of project-related land acquisition or restriction on land use. It includes: (a) physical displacement (i.e. physical relocation, loss of residence or loss of shelter); and/or (b) economic displacement (i.e. loss of assets, or access to assets that leads to the loss of income sources or means of livelihood).

The standard prescribes the following objectives:

- To avoid or, when unavoidable, minimise involuntary resettlement by exploring alternative projects, project designs and locations (where displacement is unavoidable, to develop and implement appropriate compensation, resettlement and livelihood restoration action plans);
- To avoid any forced evictions;
- To improve displaced persons' livelihoods and/or living standards, or at least restore them to pre-project levels.
- To improve living conditions among displaced poor and other vulnerable groups to at least minimum living standards, and
- To mitigate social and economic impacts from unavoidable involuntary resettlement by:
 - (i) Providing timely compensation for a loss of assets at the full replacement cost;
 - (ii) Ensuring that resettlement is designed, planned and implemented with the appropriate disclosure of information to those affected along with their consultation and informed participation;
 - (iii) Providing displaced persons with access to grievance mechanisms; and

- (iv) As a development opportunity enabling displaced persons to benefit directly from the project, as the nature of the project may warrant.

According to this standard:

Providing compensation in a timely manner and prior to taking possession of acquired assets is mandatory, except in certain cases including absentee owners or owners who passed away, and after their passing inheritance procedure was not finally concluded or it was not initiated at all, rejection of fair compensation offers or non-response to summons of the governing body to an oral hearing for the statement on the delivered compensation offer for expropriated real estate and lengthy legal proceedings regarding competing claims.

Compensation entitlements have to take into account gender aspects and that they are equally available to men and women and adapted to their specific needs.

Promoter should monitor the land acquisition, resettlement and livelihood restoration process and make adjustments (undertake corrective actions) to achieve the objectives of relevant policies.

Where repeated efforts to contact absentee owners have failed, where project-affected persons have rejected fair compensation offers, or where competing claims to ownership of lands or assets are subject to lengthy legal proceedings, the promoter may, with prior agreement of the Bank, deposit the relevant compensation funds in an interest-bearing escrow account or similar and proceed with the project activities. The promoter will immediately make compensation available to the eligible persons upon resolution of these issues.

Standard 7: Vulnerable Groups, Indigenous Peoples and Gender - Within the context of EIB projects, vulnerable or marginalized persons and groups are those that:

- are usually exposed to several risks and adverse impacts at once;
- are more sensitive to those risks and impacts, often having been subject to pre-existing discrimination; and
- have a weaker adaptive capacity for coping with those risks and recovering from those impacts, due to limited access or rights to required assets and/or resources. As a result, they can be disproportionately affected by project-related risks and impacts.

The overall objective of this Standard is to address inequalities, including those that are gender-based, and other factors contributing to vulnerability, marginalization and/or discrimination within the context of an EIB project, and to facilitate equitable access to effective mitigation and/or compensation measures as well as project benefits.

In addition, the Standard aims to:

- Ensure that projects respect the rights and interests of vulnerable, marginalized or discriminated-against persons and groups.
- Foster their effective participation in the design of project activities and mitigation and/or compensation measures, and
- Promote gender equality as a basic human right crucial for sustainable development, by ensuring that the gender specific impacts, vulnerabilities and barriers are considered and addressed.

6.4 Gaps between the national legislation and EIB Environmental and Social Policy

More detailed gaps between national legislation and EIB resettlement policies are presented in Table 1 below.

Issue	EIB requirement	National legislation	Measures to address the gap
Compensation for informal structures	Clients (project Promoter) are required to mitigate adverse social and economic impacts from land acquisition (loss of housing and/or livelihoods) by providing compensation and/or resettlement options and restoration or improvement of livelihoods, regardless of whether formal legal rights on land / structures exist.	For the project affected person without formal title on structures, there is no provision for payment of compensation. However, in practice, all affected structures are appraised and compensated at full replacement cost.	All affected structures, regardless of their legality and regardless of the status of land they are located on (including agricultural land), shall be identified during the development of the RAP and will be compensated at full replacement cost.
Informal land users	Clients (project Promoter) are required to improve or, at a minimum, restore the livelihoods, income earning capacity and standards of living of all displaced persons, including those who have no legally recognisable rights or claims to the land (present in the project affected area at the time of the cut-off date).	There are no legal requirements obligating SRIs to identify and address informal land use. In practice, informal land users have the right to participate in expropriation hearings and claiming their rights to compensation for any affected crops or trees that they planted and farmed, as well as any improvements they made. As the land acquisition process often lasts a long time and construction is often delayed, annual crops are harvested and therefore not compensated.	Eligibility of persons with no legal rights or claims to the land they occupy will be determined based on their presence in the Project affected area, at the time of site visits carried out by certified appraisers of affected land or at expropriation hearings. The Project should continue to make best efforts to identify informal users of land and compensate them for their losses or assist them, particularly if they can be categorized as vulnerable.

⁷ Official Gazette of the RS 62/06, 65/08 – other law, 41/09, 112/15, 80/17 and 95/18 – other law)

Issue	/EIB requirement	National legislation	Measures to address gap
		<p>Generally, informal use of privately owned land, without the knowledge of the owner, is extremely rare and if such cases do occur, they tend to involve public owned land.</p>	
<p>Assistance (Beyond Compensation) to Affected People</p>	<p>Clients (project Promoter) are required to improve or, at a minimum, restore the livelihoods, income earning capacity and standards of living of all displaced persons.</p> <p>Clients (project Promoter) are required to make special provisions for assisting disadvantaged or vulnerable individuals and/or groups (present in the project affected area at the time of the cut-off date) that may be more adversely affected by displacement than others and who may be limited in their ability to claim or take advantage of livelihood restoration assistance and related development benefits.</p>	<p>In line with the Expropriation Law, SRI has the option of offering increased compensation to an affected owner in case of vulnerability, however there is no firm legal obligation in the law for SRI to assess the vulnerability of affected people and provide them with additional assistance.</p> <p>During expropriation hearings, owners (and interested third parties) have the opportunity to state any specific circumstances which need to be taken into account during expropriation. In practice, at these hearings, affected people often inform the property administration representatives if the land is extremely important for their livelihoods, if they have difficulties understanding the process and what they need to do, (administrative tasks that they need to complete), if they do not have a bank account, and need help opening one, if there are any disputes with other people regarding the land,</p>	<p>The need for resettlement assistance, livelihood restoration and vulnerability aspects of displacement will be taken into account during the development of the RAP (if required).</p> <p>If required, the RAP will describe assistance measures which will be implemented in addition to financial compensation where applicable (assistance for physical displacement, livelihood restoration and enhancement measures and vulnerability assistance).</p> <p>If required, the RAP can describe the process and organizational arrangements for identifying individuals in need of assistance and means of provision.</p>

Issue	/EIB requirement	National legislation	Measures to address gap
		<p>if they have difficulties to attend the hearings, if they need more time to physically relocate, etc.</p> <p>Generally, provision of any assistance beyond financial compensation to affected people is not required under national legislation, although there is no barrier to providing such assistance and the mechanisms for providing them exist, under numerous social laws, such as Law on Social Protection.</p>	
<p>Assistance to Employees of Affected Businesses</p>	<p>In the case of businesses experiencing temporary losses or having to close because of project-related displacement, Clients (project Promoter) are required to provide additional targeted assistance and opportunities at least to restore, or where possible improve, their income-earning capacity, production levels and standards of living of both the owner of the business and employees losing pay or employment.</p>	<p>According to national legislation, SRI has an obligation to compensate an affected business and cover all losses associated with the operation of the business, as determined by certified appraisers.</p> <p>It is expected that the owner of the business will make all arrangements with his/her workers, who may suffer some temporary interruptions in employment or permanent loss of work, in accordance with the Labour Law.</p> <p>SRI, as the beneficiary of expropriation has no obligation to monitor these arrangements or to offer any additional assistance to affected employees, whose only course of action is to request their rights as defined under the Labour law.</p>	<p>If required, the RAP shall describe measures for avoiding causing an interruption of business activities, which can lead to lost net income and loss of pay / employment for business employees.</p> <p>If net income losses for businesses do occur, the owners of business activities will be compensated for such losses, based on reports of certified appraisers. The appraisers will also include in the valuation the costs associated with employee salaries during the transition period (period when the business is not operating), if such a period occurs and</p>

⁸ Official Gazette of the RS 24/05, 61/05, 54/09, 32/13, 75/14, 13/17 – decision of the Constitutional Law, 113/17, and 95/18 – authentic interpretation)

Issue	/EIB requirement	National legislation	Measures to address the gap
			<p>business owners will be able to pay their employees.</p> <p>If required, the RAP should specify that employees of affected businesses registered during the census/survey will be entitled to provision of targeted livelihood restoration assistance and/or employment opportunities, including those provided by the Project.</p>
<p>Depreciation of Assets</p>	<p>Clients (project Promoter) are required to provide compensation for loss of assets at full replacement cost.</p>	<p>In accordance with national legislation, when appraisers calculate the value of affected structures, they include depreciation in the calculation and reduce the proposed compensation amount accordingly.</p>	<p>The compensation amount will not be reduced on account of depreciation.</p>

Issue	/EIB requirement	National legislation	Measures to address the gap
<p>Obligations (and Losses) in Connection to Land Use Restrictions</p>	<p>Clients (project Promoter) are required to addresses impacts of project-related land acquisition, including restrictions on land use.</p> <p>Restrictions on land use refers to limitations or prohibitions on the use of agricultural, residential, commercial or other land that are directly introduced and put into effect as part of the project.</p> <p>These may include restrictions on land use within easements or safety zones.</p>	<p>As a result of land use restrictions which are to be enforced in the two zones defined along the railway corridor during the operations phase (infrastructure zone and fire safety zone), some owners of land may suffer losses.</p> <p>This applies in cases when someone submits a request for a permit to construct a new structure within the infrastructure zone and fulfils the urban plan requirements, but is denied the permit by SRI (due to the possibility of jeopardizing railway operations or the planned structure itself). It should be noted that such cases occur rarely in practice and SRI most often issues approvals for construction.</p> <p>Losses may also occur when owners of land where trees need to be removed or any other fire safety measures need to be applied, have to finance these activities from their own sources. This too is a rare occurrence in practice and SRI most often finances any needed land clearance activities.</p>	<p>If required, the RAP shall include measures to address possible impacts, as follows:</p> <p>SRI will grant approval in all cases when the safety of the railway and the planned new structure is not jeopardized.</p> <p>In cases when that is not possible, SRI will cooperate with the owner of the land and suggest changes that need to be made on the planned structure or its location, so that approval may be granted.</p> <p>If required, the RAP shall also include the obligation to compensate affected people for any losses of crops and trees, caused by land use restrictions.</p>
<p>Severance impacts</p>	<p>Clients (project Promoter) are required to identify and address impacts on incomes or livelihoods that are not a direct result of land acquisition or land use restrictions-</p>	<p>There is no firm legal requirement for consulting affected people and communities about the locations of overpasses and underpasses to be able to cross the railway and access their land on the other side of it, both during construction and operation.</p> <p>. Due to closure of some local roads that cross the railway, some land users have to travel greater distances over denivelations (overpasses and underpasses) to be able to access their land, leading to economic losses over time.</p>	<p>This impact, which could indirectly affect livelihoods, will be addressed through consultations with local communities, as needed and as in accordance with international best practice.</p>

Issue	/EIB requirement	National legislation	Measures to address the gap
RAP Development and Implementation Requirements	<p>Where displacement is unavoidable, Clients (project Promoter) are required to develop and implement appropriate compensation, resettlement and livelihood restoration action plans.</p> <p>Clients (project Promoter) are required to establish a grievance mechanism to receive and timely address specific concerns about compensation and relocation that are raised by displaced persons, including a recourse mechanism designed to resolve disputes in an impartial manner.</p> <p>Clients (project Promoter) are required to monitor the land acquisition, resettlement and livelihood restoration process and make adjustments (undertake corrective actions) to achieve the objectives of relevant policies.</p>	<p>In the case of expropriation, national legislation does not require the development and implementation of resettlement or livelihood restoration plans, nor does it require setting up and implementing a grievance mechanism or monitoring resettlement and evaluating the outcomes of land acquisition and resettlement.</p>	<p>This document includes provisions for setting up and implementing a grievance mechanism as well as monitoring the land acquisition, resettlement and livelihood restoration process.</p>
Vulnerable Groups	<p>Promoter is obliged to address project-related inequalities, including those that are gender-based, and other factors contributing to vulnerability, marginalization and/or discrimination, and to facilitate equitable access to effective mitigation and/or compensation measures as well as project benefits.</p> <p>Promoter should ensure that project respects the rights and interests of vulnerable, marginalized or discriminated persons and groups, to foster their effective participation in the design of project activities and mitigation and/or compensation measures, and to promote gender equality as a basic human</p>	<p>The Law on Social Welfare is based on several key principles that simultaneously represent the rights of social service users:</p> <p>Principle of Accessibility: Social services must be accessible to all citizens without discrimination.</p> <p>Principle of Equality: All users have the right to equal protection and access to services, regardless of their personal characteristics.</p> <p>Principle of Individualization: Services are tailored to the specific needs of each individual, aiming to achieve optimal outcomes.</p> <p>Principle of Respect for Human Rights and Dignity: Service provision must respect the dignity and basic</p>	<p>Ensure equal attendance and participation of men and women, as well as enable the presence of persons with disabilities and other vulnerable individuals or their representatives at public consultations and meetings.</p> <p>During communications with property owners subject to expropriation, take all necessary measures to appropriately inform all vulnerable individuals about relevant project updates, particularly regarding the expropriation process and compensations, and ensure their voices are heard.</p>

	<p>right crucial for sustainable development, by ensuring that the gender specific impacts, vulnerabilities and barriers are considered and addressed.</p>	<p>rights of users.</p> <p>Principle of Solidarity: Promotes solidarity within the community, where all members of society assist those in need.</p>	<p>Throughout the expropriation process, the promoter will emphasize the importance of protecting the rights of women (and other vulnerable groups) in communications with local government representatives, and pay special attention to cases where they may be relinquishing property rights to male relatives.</p> <p>The grievance mechanism, as a tool for protecting the rights of all Affected Persons (PAPs), will specifically ensure efficiency in cases of rights violations related to gender or other vulnerable groups.</p> <p>The promoter will collaborate with local Centres for Social Welfare and NES to define special measures and communication channels in cooperation with these services, aimed at providing specific assistance to vulnerable individuals affected by the project's effects, including employment support on the project if possible.</p>
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7 Compensation Entitlements

All impacts considered to be likely are addressed in the Entitlements Matrix table below.

Table 2 Entitlements Matrix

Type of potential loss/ impact	Category of affected person/ entity	Entitlements
Permanent loss of privately owned land (agricultural, forest, residential, commercial or any other)	Owner of land	Land compensation of the same type and quality in the same area or vicinity OR Cash compensation for land at full replacement cost, as determined by the Tax Administration. Any identified economically unviable – remaining land, will also be acquired, if requested by the owner and determined as unviable, by certified appraisers.
	Formal user of land (renting land)	To be informed about the acquisition of the land at least six months in advance of the beginning of construction works on the land, to allow the person renting the land to find an alternative option and vacate project affected land.
	Informal user of land	To be informed about the acquisition of the land at least six months in advance of the beginning of construction works on the land to allow the person using the land informally to find an alternative option and vacate project affected land.
Permanent loss of access to public land for agriculture	Formal user of land (renting land)	Replacement public land of the same size and quality for use or revision of existing contract to reflect the reduced area of land available for use. Compensation at full replacement cost of any damages or losses suffered by the affected land user.
	Informal user of land	In case of fulfilment of any of the vulnerability criteria, assistance to access other land for use, as well as any other needed vulnerability assistance.
Loss of annual crops or plants (including losses stemming from land use restrictions)	Owner of crops (can be the owner of the land or the formal or informal user of the land)	The right to harvest crops; OR Cash compensation for lost annual crops, at full replacement cost, as determined by certified appraisers.
Loss of fruit trees/vines (including losses stemming from land use restrictions)	Owner of fruit trees/vines	Cash compensation for lost perennial yields and timber (if applicable), at full replacement cost ⁴ , as determined by certified appraisers.
Loss of forest trees (including losses stemming from land use restrictions)	Owner of forest trees	Cash compensation for loss of forest trees, at full replacement cost ⁵ , as determined by certified appraisers.

⁴ Replacement cost will be calculated based on the age and the productivity (yield) of perennial crops/trees/plants and the amount of time (number of years) that would be needed to grow a new crop/tree/plant to the same productivity age, as well as the cost of affected timber, as defined by the Expropriation Law.

⁵ Replacement cost will be calculated based on the maturity of the forest trees and the potential use of wood / timber, as defined by the Expropriation Law.

Type of potential loss/ impact	Category of affected person/ entity	Entitlements
Loss of any improvements made to the land (e.g. irrigation system, water well)	Owner of the improvements (can be the owner of the land or the formal or informal user of the land)	Cash compensation for the improvements at full replacement cost, as determined by certified appraisers; AND The right to remove and take away any removable improvements made on the land.
Permanent loss of formal (registered) or informal residential structure or apartment and physical displacement of households living in them	Owner of structure/ apartment and members of his/her household Formal user of the structure/ premises (renting the structure)	Cash compensation for the residential structure/ apartment at full replacement cost, determined by certified appraisers; OR Replacement structure/ apartment corresponding in size and quality to the lost living space, registered as ownership in the name of the previous owner, in the Cadastre; AND Moving assistance or allowance.
Permanent loss of residence (house or apartment) owned by SRI (with or without contract) and physical displacement of households living in them	Household members occupying the residence, as registered by the census.	Replacement residence (house or apartment) corresponding in size and quality to the lost living space, with security of tenure (continued rent or use contract). AND Moving assistance or allowance.
Permanent loss of (or access to) formal (registered) or informal non-residential structure/ premises (shed, garage, business premises, well, etc.)	Owner of the structure/ premises	Cash compensation for the affected structure / premises, at full replacement cost, determined by certified appraisers.
	Formal user of the structure/ premises (renting the structure)	To be informed about the acquisition of the structure/premises at least six months in advance of the demolition of the structure, to allow the person/ organisation renting the structure/ premises to find an alternative option and vacate project affected structure/ premises.
Relocation of operational businesses	Owners of registered (licensed) businesses	As determined by certified appraisers: > The cost of re-establishing activities elsewhere > Lost net income during the transition period, if it is determined that such a loss occurred > The cost of transfer and reinstallation of the plant, machinery or other equipment
	Employees of the affected businesses (permanent or temporary, registered and unregistered)	Provision of targeted livelihood restoration assistance and/or employment opportunities, including those provided by the Project.
The obligation to request approval from SRI in the process of obtaining a construction permit for the construction of new structures on privately	Owner of land requesting construction permit	SRI will grant approval in all cases when the safety of the railway and the planned new structure is not jeopardised. In cases when that is not possible, SRI will cooperate with the owner of the land and suggest changes that need to be made on the planned

Type of potential loss/ impact	Category of affected person/ entity	Entitlements
owned land within the infrastructure zone		structure or its location, so that approval may be granted.
Loss of income or livelihood associated with either of the above losses (economic displacement)	All categories of affected persons listed above.	Individually tailored livelihood restoration or improvement assistance (e.g. assistance to access employment on the Project or through the National Employment Service, assistance to access other land for use, assistance to access available agricultural programmes, etc.)
Disproportionate/more difficult impact, as a result of vulnerability	Vulnerable individuals/households	Individually tailored assistance (assistance in obtaining needed personal documents, assistance to open a bank account, assistance to access social welfare or health programmes provided in the municipality, etc.)
Permanent loss of municipally owned structures	Municipalities	Cash compensation for the structures (if the municipality purchased them) at full replacement cost, determined by certified appraisers; OR Replacement structure for long term use.
Permanent loss of community infrastructure [=	Local community	Replacement community infrastructure of the same size and characteristics in a nearby location.
Undefined impact (permanent or temporary loss)	All categories	Any undefined impact shall be mitigated in accordance with the principles and objectives of the RPF.

Depending on the type of loss/impact and the category of affected person (owner, formal and informal user), he/she will be entitled to compensation and/or assistance. The following chapter provides more details on each type of entitlement.

8 Compensation and Assistance Measures

8.1 Cash Compensation for Affected Land and Assets

Appraisal of affected assets will be conducted by certified appraisers and it will be carried out for both formal (registered) and informal assets.

Cash compensation will be provided at full replacement cost, meaning that affected owners of the assets will receive enough compensation to purchase a replacement asset and cover any associated costs or losses.

It should be noted that under national legislation, replacement land and structures can also be provided instead of cash compensation, upon the request of the affected owners. However, if the amount of land being acquired from any one individual/household is small and if there is land available for purchase on the market in the Project area, it is assumed that this option will not be widely requested by affected people. Nevertheless, it is available and can be provided, as required under national legislation and the Lenders' policies.

Compensation for land

Replacement cost of land will be equal to or exceed the market value of land with similar characteristics, in the vicinity of the affected land, plus any transaction costs. The local tax administration office in the municipality will review the most recent and nearest sale purchase agreements concluded and will determine the market price. It should be noted that in recent years, since the introduction of public notaries in Serbia, it has become very difficult, if at all possible, for people to underreport the agreed sale purchase price, which means that the prices reviewed by the tax administration are in fact relevant

and realistic. It should also be noted that very often the highest prices per m² are used in the calculation, as the authorities recognise that owners of affected assets have certain expectations and the only way to foster a faster process is to offer an appealing compensation rate. The rates enable affected owners to buy replacement land, more of it, and to cover any associated costs. On the other hand, court proceedings due to disagreements between a promoter and land owners regarding the value of the land are not rare.

Separate rates are provided for agricultural and forest land (which is valued as agricultural land, plus the separate compensation of trees) and for construction land. Construction land is more valuable and its cost can sometimes be significantly higher than for agricultural land.

Since this is a linear Project, most of the land plots will presumably need to be acquired only in part. As per national legislation, owners of land have the right to request that the remainder of their land is also acquired, if it is determined that this land will be economically unviable (orphan land) and / or otherwise unusable. Certified appraisers will assess these cases and determine if the remaining part of the plot has to be acquired by SRI too.

A specific impact which could occur during the Project operations phase, stemming from the Railway Law, is the obligation of an owner of land to obtain a permit from SRI for constructing new structure on his/her privately owned land within the 25m infrastructure zone. To obtain a permit, the proposed structure firstly has to be in compliance with the urban plan of the relevant municipality. If that condition is fulfilled, the person intending to construct has to request approval from SRI. In most cases, SRI issues approvals of such requests, however the company does have a right to refuse issuing the permit, if the proposed structure would endanger the operation of the railway or if the structure itself would be endangered by the operation of trains. In any such cases, SRI will seek to find a solution together with the affected person to design or locate the structure in such a way that he/she is able to get the necessary permit.

Compensation for crops, trees, plants

All owners of affected annual crops will be entitled to harvest them, as well as to collect fruit and cut down trees (in case of orchards and vineyards) before land is used for construction. If this is not possible, all associated losses will be compensated at full replacement cost. Appraisal of crops, plants and trees will take into account various important features, such as their age and productivity, or the resources and amount of time that would be needed to grow a new tree/plant, as defined by the Expropriation Law.

Compensation for structures / apartments

Replacement cost of formal structures, registered in the Cadastre, will correspond to the market value of structures with similar characteristics, in the affected area, plus any transaction costs. Replacement cost of informal residential and business structures (built without construction permits and not registered in the Cadastre) as well as non-residential structures, will be calculated in the same manner. The compensation amount will also be sufficient to cover the costs of moving furniture and personal belongings to another location.

These provisions also apply to municipally owned structures, if they have been purchased by the municipality. If not, the municipality will not be compensated.

8.2 Replacement Houses and/or Apartments

Any households residing in affected SRI owned houses and apartments will be entitled to replacement apartments. SRI often deals with the need to provide replacement housing for persons who reside in properties belonging to the railway and has the relevant experience to ensure that adequate solutions are identified for everyone. Each affected household will be approached individually to discuss resettlement options, including the location of replacement properties for use, which will likely be in the same municipalities, however they may also be in other parts of Serbia, depending on the household's wishes and availability of housing owned by SRI.

SRI will ensure that the provided housing conditions comply with international standards for adequate housing using the following key criteria: adequacy, accessibility, affordability, habitability, cultural appropriateness, suitability of location, security of tenure and access to essential infrastructure and services.

All households will sign new contracts for the use of the properties, giving them security of tenure and protection from future evictions. All household members recorded by future socio-economic surveys will be included in these contracts.

8.3 Cash Compensation for Affected Businesses

Any affected business structures will be compensated as described in Section 8.1 above (Compensation for structures). In addition, certified appraisers will assess additional costs associated with moving the business to another location, including the costs of relocating any affected materials, equipment or machinery. Addressing business structures (as well as residential structures) that might need to be expropriated will be priority to allow for enough time to avoid any additional impacts. In this way, in the case of business activities, the owners of businesses will be able to operate normally in existing structures until they are able to secure a new location to which they will resettle their activities and create the conditions for uninterrupted continued operations, in that way reducing the need for any transition period during which lost net income can occur.

The time that is needed for securing a new location and preparing the structure for continued operation will be agreed with each owner individually depending on the type of business activity. If the appraisers determine that an interruption of activities which can lead to lost net income will occur, or if the owner of the business activity subsequently proves that net income losses occurred (based on official financial reports of the businesses), the owners of business activities will be compensated for such losses. The appraiser will also include in the valuation the costs associated with employee salaries during the transition period (period when the business is not operating), if such a period occurs.

Any unregistered businesses will be provided with support in legalising their business activities.

8.4 Assistance Measures

SRI, namely legal department and the social specialist of the PIU, will cooperate with all affected municipalities, including Community Liaison Officers (CLOs) and municipal services (e.g., social services for vulnerable individuals and groups), to make various existing support programs available to affected people. This will be done based on the specific impacts of the Project on the individuals and their needs. Assistance measures are grouped into three categories, as presented below:

Assistance for physical resettlement

In the case of privately owned houses and businesses, it is expected that affected people will prefer to resettle independently upon receiving cash compensation for their assets, which will also include the costs of moving (furniture, personal belongings, materials, equipment or machinery). Households will have a period of six months to vacate their homes, unless otherwise agreed with the owners. The period required for businesses to relocate will be determined by certified appraisers and will be included in signed compensation agreements.

Any households residing in SRI owned houses and apartments will either be provided with a cash payment to organise the move independently, which will be determined based on the distance to the new residence, or their belongings and furniture will be transported directly by SRI.

Livelihood restoration and enhancement

Possible livelihood restoration strategies for affected people will be centred around assistance to access available programmes provided through local authorities, either from their own funds or from state funds, in:

- a) Agriculture
- b) New employment or self-employment, including training and re-training

State subsidies in agriculture are defined annually through a Government Decree (latest Decree from December 2021, edited in January 2022⁶) and implemented at municipal level. Subsidies are available for the following agricultural activities:

- Plant production (production of crops, vegetables, fruits, including organic production, procurement of inputs such as fertilizer, fuel, insurance, etc.)
- Livestock breeding (breeding calves, lamb, pigs, bee keeping, fish production, organic breeding, insurance, etc.)
- Equipment and machinery (procurement of tractors, irrigation, greenhouses, all types of equipment, construction of animal shelters, production facilities, market placement, etc.)
- Product processing (fruits and vegetables, oil plants, medicinal, herbal and aromatic plants, bee products, meat, milk, etc.)
- Other subventions (young farmers, municipalities and cities, forestry, hunting, fishing, celebratory events, arable land given for rent, association of farmers / producers, cooperatives, private counselling, etc.)
- Agricultural loans

More subsidies, as well as agricultural grants for entrepreneurs and businesses, are provided through the IPARD programme⁷.

The National Employment Service (NES) (<http://www.nsz.gov.rs>) is an important potential implementing partner, with its branch offices in the affected municipalities. The NES can work with affected people to develop their own individual career/employment plans and provide access to available jobs. NES counsellors are available to guide each registered individual in applying for and keeping a job. The NES also provides advice in establishing a micro/small business and subsidies for self-employment, as well as training and re-training opportunities.

Vulnerability assistance

Some households in the Project area may be considered more vulnerable than the other affected population. Vulnerable individuals and households will be identified during the implementation of the census and socio-economic surveys to be conducted during the development of future RAP. Household members who have no income sources will be offered livelihood restoration assistance, as described in the previous section, and the households will be assisted to physically relocate, with security of tenure. In addition, if needed, they will be assisted to replace their personal documents, with the address of the new registered residence. The households will be provided with any additionally needed assistance, with the involvement of the local Centre for Social Welfare and any other relevant municipality department, to ensure they relocate safely and have access to livelihood restoration or social welfare assistance in the new place of residence.

Vulnerability will be further explored at expropriation hearings once the expropriation proceedings begin. The participants of expropriation hearings will also determine if a particular affected person and his/her household are in any way vulnerable and will be impacted to a higher degree by land acquisition, and will prepare a plan of action to assist him/her (and members of his/her household, if applicable). Assistance could include any of the livelihood restoration measures already mentioned, but also any assistance to resettle (in case of physical displacement), legal aid, assistance to obtain personal documents, assistance to access social welfare or health services, etc. Any agreed measures will be monitored and reported on by SRI.

If any users of affected land (non-owners) are identified as being vulnerable and dependent on the land they are using, SRI will cooperate with the municipalities to identify suitable replacement land that may be provided to such users, to ensure that their livelihoods are restored.

⁶ Decree on the Distribution of Subsidies in Agriculture and Rural Development in 2022 (Official Gazette of the RS No. 125/21)

⁷ Instrument for Pre - Accession Assistance in Rural Development (<https://ipard.co.rs>)

9 Implementation Arrangements

Roles and responsibilities

SRI will be responsible for the implementation of expropriation in line with this RPF. For RAP development, if needed, SRI will engage qualified and experienced resettlement experts familiar with national legislation and EIB requirements.

SRI has appointed a **Resettlement Manager**, who is also the SRI Manager for Legal and Corporate Affairs, for managing the land acquisition process. His associates will participate in expropriation hearings and will report back directly to him. With support from received Technical Assistance, SRI will also engage **Resettlement field officers**, one in each municipality, whose task will be to act as liaison between SRI and all local stakeholders, including affected people. Field officers will particularly assist with the identification of informal users and vulnerable people, ensure that foreseen resettlement and livelihood restoration assistance is implemented and assist with grievance management at the local level.

As many of the activities within the process of land acquisition are performed by various other institutions and organisations, it will be the Resettlement Manager's responsibility to ensure they are adequately informed and that they participate in the process as it will be presented in the potential RAP. The SRI Resettlement Manager will also have the overall responsibility for monitoring the implementation of future RAP and reporting to the Lenders.

Costs and timetable

Costs associated with the development and implementation of future RAP will be borne by SRI from approved budgetary funds, including particularly compensation for all affected land and assets. SRI will request the necessary funds from the Ministry of Finance each year in line with the progress of expropriation. Resettlement, livelihood restoration and/or vulnerability assistance costs may be borne directly by service providers, involved in providing this assistance, from their existing budgets (e.g., Centres for Social Welfare, NES, training institutions).

The detailed budget and timeline for implementation will be defined in each RAP which will be prepared prior to initiation of any land acquisition activities.

10 Monitoring, Evaluation and Reporting

SRI will actively monitor the implementation of RAP until all displacement impacts have been mitigated. The key indicators that will be used to assess progress of land acquisition and whether the desired outcomes are being achieved are presented in the table below.

Table 3 Indicative list of indicators which will be used for monitoring

Indicator	Source of Information	Frequency of measurement during land acquisition
Input indicators		
Overall spending on land acquisition, by categories of expenditures	SRI financial records and inputs from local service providers	Monthly
Number of group consultation meetings, results of consultation activities	Meeting minutes Consultation reports	Biannually
Number of individual expropriation hearings	Expropriation decisions	Monthly
Number of affected people/households / businesses, by category (owners or users, formal or informal) and types of impacts (physical displacement, loss of land, loss of	SRI census registry and grievance management records Appraisal reports	Monthly

Indicator	Source of Information	Frequency of measurement during land acquisition
business structures, loss of income, loss of non-residential structures)		
Number and type of affected assets (land, residential structures, non-residential structures, businesses, land plots with orchards, etc.)	SRI census registry Appraisal reports	Monthly
Additionally needed land (beyond land that is being acquired in line with the preliminary design) and how/when it will be acquired	Updated project design and expropriation studies	As relevant
Output indicators		
% of expropriation decisions completed (from the total number of expropriation cases)	SRI census registry	Monthly
% of expropriation decisions processed involving temporary representatives (without the participation of owners)	SRI census registry	Monthly
% of compensation agreements reached	SRI census registry	Monthly
% of compensation payments executed	SRI census registry	Monthly
% of cases in which affected people turned to the court requesting higher compensation	SRI census registry	Monthly
% of cases where affected people requested the acquisition of an additional part of the plot (orphan land)	SRI census registry	Monthly
Outcome indicators		
Number of cases where expropriation and/or displacement was avoided (and description)	Updated project design and expropriation studies	As relevant
Number and type of grievances and how they were/are being addressed (trends)	Grievance management records	Monthly
Number of cases where land was being used by someone other than the owner (formal or informal user) and description of these cases (who are the users, what arrangements were made for use of land, what type of assets belonging to the user were affected, was there a need for compensation and if so, how was it executed, etc.)	Expropriation hearings SRI census registry	Monthly
Number of cases where the acquisition of the land will severely impact livelihoods and description of these cases (how are livelihoods impacted, what actions have been undertaken and outcomes)	Expropriation hearings SRI census registry	Monthly

Indicator	Source of Information	Frequency of measurement during land acquisition
Number of cases involving vulnerable people and a description of these cases (type of vulnerability and how it was addressed, outcomes of provided assistance)	Expropriation hearings SRI census registry	Monthly
How did affected people use the compensation?	Surveys with affected people	Biannually
Does compensation represent full replacement cost?	Investigate whether cash compensation was adequate to ensure no reduction of standard of living, loss of income or livelihood	Biannually
Physical displacement – satisfaction with new homes, access to infrastructure and/or services compared to pre project situation, investments into new furniture, etc.	Individual meetings with people/households SRI census registry	Twice in the year following resettlement and after the first year annually until displacement impacts have been mitigated.
Economic displacement – have businesses re-established their activities in new locations; income level compared to pre project situation; number of employees compared to pre-project situation. Have employees continued to work for the same businesses in new locations, have their salaries changed since before displacement and how, etc. Were livelihood restoration measures needed and if so, what kind of measures.	Individual meetings with business owners Individual meetings with affected employees	Twice in the year following relocation of the business and after the first year annually until displacement impacts have been mitigated.

The RAP Manager, with support from the RAP field officers, will maintain a census registry ([Annex 3: Census Registry](#)) and grievance log ([Annex 2: Grievance Log](#)) and based on that, using the indicators listed above, will prepare RAP reports, issued for SRI management on a monthly basis. Information from these reports will be summarised in quarterly reports which will be submitted to EIB. The SRI RAP Manager, his associates in SRI and RAP field officers, will document all meetings and consultations with minutes and photographs and will attach these to the reports. All information on individuals/households, their affected assets and their compensation payments will be kept confidential.

A final **Land Acquisition and Resettlement Execution Report** will be developed and submitted to EIB when all land acquisition has been completed and all impacts successfully mitigated. The report will include: a summary of project impacts (both physical and economic displacement) and principles guiding the resettlement plan; description of efforts to avoid and minimise displacement; summary of consultation events and outcomes, including how they influenced entitlements and other features of the land acquisition, resettlement, and livelihood restoration activities; description of the compensation delivery process; description of any issues encountered and how they were resolved; summary of grievances received and how they were resolved, including the list of any grievances and court cases

pending at the date of submission of the report; description of resources mobilised to plan and implement land acquisition, resettlement, and livelihood restoration activities.

In addition, for subsections where the magnitude of displacement impacts is significant, the Lenders may require periodic external compliance reviews or an external completion audit of land acquisition and resettlement activities, as to be agreed with the Lenders.

11 Grievance Mechanism

SRI and the contractors will accept all queries, comments and complaints associated with the Project-related land acquisition. Affected people can submit comments, complaints and/or requests for information in person or via post, telephone or email using the following contact information:

Name: Ana Kopren Title: Environment and Social Manager Company: Public Enterprise Serbian Railways Infrastructure Email: ana.kopren@srbrail.rs Phone number: Address: Nemanjina 6, 11000 Belgrade

Citizens with grievances and inquiries can also address them to the Contractor TRACE and the Supervision Engineer, Consortium DB EC (leader), Egis, PBU, TDS, CERTIFER, namely persons delegated to address grievances are:

TRACE:

HSSE Manager - Mr Marko Risimović

email: marko.risimovic@trace.bg

Consortium DB EC (leader), Egis, PBU, TDS, CERTIFER:

Supervision social specialist - Mrs Milica Joković Pantelić,

email: Milica.JOKOVIC-PANTELIC@egis-group.com

The Project grievance form is provided in [Annex 1: Grievance Form](#).

All grievances will be registered in a grievance log ([Annex 2: Grievance Log](#)). Persons who submitted the grievance will be informed about the receipt and recording of the grievance within 7 days and the grievance will be responded to within 30 days. For complex grievances, more time is sometimes needed, in which case SRI will inform the person that submitted the grievance (within those 30 days) of the expected time frame for the response.

SRI is responsible for ensuring that all grievances are collected, recorded and processed. Grievances are processed by legal department, that sends a response to the person who submitted the grievance based on the internal decision, including what actions have been (or will be) undertaken to address the grievance. Depending on the type of grievance and the actions required to address it, the SRI appointed person from the legal department, depending on the severity of the grievance, may also discuss the grievance with representatives of the relevant municipality and the property administration, or other relevant stakeholders. Dedicated meetings between SRI representatives and persons who submitted the grievance may also be held and may involve representatives of the relevant municipality or other local stakeholders, with the aim of identifying a solution to the grievance, acceptable to all parties. Detailed information about Grievance Mechanism will be prominently displayed at the Contractor's camp as well as at all railway stations and local's community along the entire project.

Grievances in relation to construction activities will be addressed directly by the Contractor TRACE and their management will be monitored by the relevant SRI department.

At all times, complainants are also able to seek legal remedies in accordance with the laws and regulations of the Republic of Serbia.

12 Annexes

Annex 1: Grievance Form⁸

Grievance Reference Number (to be filled in by HSSE Manager):			
<p>Contact Details:</p> <p>Note: Complaints are possible to submit anonymously and in case of that the notification of the decision will be displayed on the bulletin board at the place from which the complaint is made collected.</p>	› Name:		
	› Address:		
	If you would like us to inform you about the resolution of the appeal by post, please enter your residential address:		
	› Tel:		
	› E-mail:		
How would you prefer to be contacted? Please tick box.	By post:	By phone:	By email:
Details of your grievance. Please describe the problems, who it happened to, when, where and how many times, as relevant.			
What is your suggested resolution for the grievance?			
Signature:		Date:	
Name and Surname of the Office Clerk:			

⁸ The grievance form for the local population will be printed exclusively in the Serbian language.

Annex 2: Grievance Log

Number of the grievance	Initiator					Person delegated to address grievances in TRACE		Problem			
	Settlement	Type of the problem	Name	Date	Phone number	Name	Phone number	Description of the problem	Actions to be done	Results of the intervention	Closing date of the issue
1											
2											
3											
4											
5											
6											
7											
8											
9											
10											
11											
12											
13											
14											
15											

Annex 3: Census Registry

No. from Exp. Study	No. of basic land plot (Cadastral)	Size of basic land plot (in m2)	Decision on land plot division from the Republic Geodetic Institute	Divided plot number	Type of land use as compensated (construction, agricultural)	Name of the owner(s)	Temporary representative appointed and reason	Contacts of the owner(s)	Is land used by someone other than the owner (user of land)? Name and contact details	Total area to be acquired (in m2)	Structures on land (house, auxiliary, business)	Crops, fruits, vegetables, trees

Submitted expropriation proposal	No. of Immovable Property registry	Request for entry of exp. note in Cadastral	Number of case file	Request for acquisition of orphan land (accepted or not)	Expropriation decision final	Appeal on the exp. decision	Expropriation decision legally binding	Scanned and sent to Development department	Finalised registration in Cadastre	Request to Tax Administration for rates	Submitted compensation offer	Price per m2 in RSD

Total compensation offer in RSD	Agreement on compensation	Court (date / amount)	Sent for payment	Payment made on:	Interest	Request for entry into property	Decision of the Ministry of Finance – entry into property	Grievance submitted (and registered in the grievance log with No. XXX)	Vulnerability (if yes, briefly describe the type of vulnerability)	List all assistance provided (moving allowance, additional compensation and for what, in kind assistance and type of assistance)	Remarks