



RESETTLEMENT ACTION PLAN

Reconstruction and Modernisation of the Niš – Dimitrovgrad Railway Line

- Component Sićevo – Dimitrovgrad -

SECTION STANIČENJE – DIMITROVGRAD



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List of Abbreviations and Acronyms

Aol	Area of Influence
CM	Cadastral Municipality
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standards
E&S	Environmental and Social
EU	European Union
GM	Grievance Mechanism
GoRS	Government of the Republic of Serbia
IFI(s)	International Financial Institution(s)
JASPERS	Joint Assistance to Support Projects in European Region
LRP	Livelihood Restoration Plan
M&E	Monitoring and Evaluation
MCTI	Ministry of Construction, Transport and Infrastructure
MoF	Ministry of Finance
NGO	Non-Governmental Organization
PAP(s)	Project-Affected Person(s)
PAH	Project-Affected Household
PIU	Project Implementation Unit
PPT	Power Point
RAP	Resettlement Action Plan
RS	Republic of Serbia
SEL	Stakeholder Engagement Log
SEP	Stakeholder Engagement Plan
SRI	Serbian Railways Infrastructure
TEN-T	Trans-European Transport Network
WBIF	Western Balkans Investment Framework

Glossary

Area of Influence	Aol refers to the geographic area within which a project is expected to cause direct and indirect social, economic, and environmental impacts.
Compensation	Payment in cash or in kind to replace assets or rights lost due to the project activities.
Component	The part of the Niš - Dimitrovgrad railway line from Sicevo to Dimitrovgrad, approximately 82,5 km long.
Consultation	The process of sharing information, getting feedback and/or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
Cut-Off Date	The date after which new occupants or developments are not eligible for compensation.
Disclosure	The process of making documents publicly available.
Displacement	Refers to the involuntary removal or restriction of access of individuals, households, or communities from land, property, assets, or natural resources they use, occupy, or depend upon, as a result of project-related land acquisition or restrictions on land use.
Economic displacement	The loss of assets (including land) or access to assets that leads to loss of income or means of livelihood as a result of project-related land acquisition or restriction of access to natural resources.
EIB Environmental and Social Standards (ESS)	A set of principles and requirements established by the European Investment Bank (EIB) to ensure that projects it finances comply with high environmental and social sustainability standards.



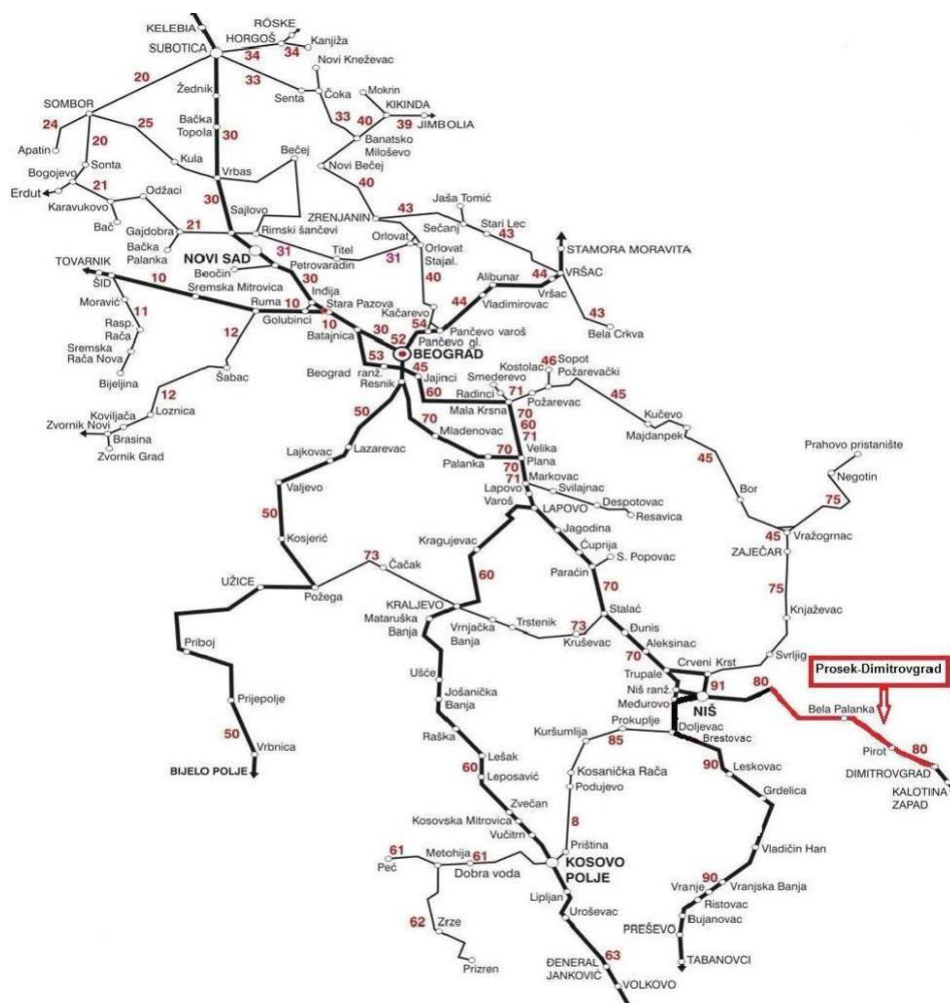
Entitlements	Benefits provided to affected persons, including compensation, assistance, and livelihood restoration.
Environmental and Social Impact Assessment (ESIA)	A study evaluating a project's potential environmental and social impacts.
Expropriation	Procedure of acquiring private immovable property for public needs.
Expropriation Study	A geodetic document containing data on the real estate for which expropriation is proposed.
Involuntary Resettlement	Resettlement occurring without the affected persons' consent due to development projects.
Land Acquisition	The process of acquiring private land for public purposes.
Livelihood Restoration Plan	Measures to restore and improve affected persons' livelihoods.
Project	Reconstruction and modernization of the Niš - Dimitrovgrad Railway.
Project Implementation Unit (PIU)	Project Implementation Unit refers to the working unit, formed by the promoter, which is responsible for coordinating the entire execution of the project. In this Project, promoter is organized via the SRI Department for the Implementation of EU-funded Projects.
Project Affected Parties (PAP)	An individual impacted by the project, including those experiencing immovable property/rights loss or livelihood disruption.
Project Promoter (Beneficiary)	Refers to the responsible state agency for project implementation, in this case Ministry of Construction, Transport and Infrastructure (MCTI) and Serbian Railways Infrastructure (SRI)
Replacement cost	A method of valuation yielding compensation sufficient to replace the expropriated assets, plus necessary transaction costs associated with asset replacement.
Resettlement	The process of relocating individuals or communities due to a project activity.
Resettlement action plan (RAP)	A document outlining how resettlement impacts will be managed, including compensation and assistance.
Resettlement Assistance	Support provided to displaced people to aid in relocation and livelihood restoration.
Section	The part of the of the Niš - Dimitrovgrad railway line from Staničenje to Dimitrovgrad railway station, approximately 32,5 km long.
Stakeholders	Stakeholders are those who will be or are likely to be directly or indirectly affected, positively or negatively, by a project (commonly referred to as project-affected people or project-affected communities), as well as those who might have an interest in, or may influence, the project.
Stakeholder engagement	Broad, inclusive and continuous process of communication between the project beneficiary and PAPs and other interested parties. It includes broad participation and input to project design and procedures, including public consultations, social surveys, document disclosure etc.
Vulnerable people	Individuals or groups requiring special assistance due to specific characteristics such as age, gender, ethnicity, disability, economic disadvantage, or social marginalization. Vulnerable people may be more severely affected by project impacts or may be limited in their ability to claim or access resettlement support, compensation, or benefit from development opportunities.

1. INTRODUCTION

The Project: To enhance the efficiency and safety of its railway operations, and to strengthen national connectivity with European transport networks, the Republic of Serbia has, in recent years, invested substantial resources in the reconstruction and modernisation of its railway infrastructure. These initiatives are implemented through various projects aimed at overall upgrading railway capacities. The entity responsible for promoting and managing these projects is the joint-stock company "Serbian Railways Infrastructure", established to oversee the management of the national public railway infrastructure (hereinafter: **SRI or the Promoter**).

One of the most important ongoing railway projects in Serbia is the Reconstruction and Modernisation of the Niš - Dimitrovgrad Railway Line, which is largely funded through EU support. The Niš - Dimitrovgrad railway line is 97 km long part of the pan-European corridor X which passes through Serbia and connects it with Bulgaria. On October 12, 2022, SRI assigned to the consortium of companies JV TRACE-CAF-START (hereinafter: **the Contractor**) the task of reconstruction and modernization of the part of the Niš - Dimitrovgrad railway line from Sicevo to Dimitrovgrad, approximately 82,5 km long (hereinafter: **the Component**).

Figure 1 – Map of Serbian Railway Corridors Showing the Component Railway Line (Highlighted in Red)



The reconstruction and modernization of the Component will be carried out in two main phases:

1. Reconstruction of the track infrastructure (ongoing) and
2. Construction of the electric traction and contact network facilities, reconstruction of signaling, safety and telecommunications devices with the construction of accompanying facilities.

The first, Reconstruction phase, is divided into six phases of work.

This Resettlement Action Plan (hereinafter: **RAP**) covers the first three of the six reconstruction phases and focuses on displacement activities and their impacts on the local population and communities. The covered area begins in the settlement of Staničenje, continues through the territory of the City of Pirot and the settlement of Sukovo, and ends at the Dimitrovgrad railway station (hereinafter: **the Section**).

The Section extends over 32.55km and includes two railway stations: Pirot – 1.7km long and Sukovo – 0.9km long, and three phases of construction works (open track segments):

- Phase 1 from Staničenje to Pirot - 7,45km long;
- Phase 2 from Pirot to Sukovo - 12,35km long;
- Phase 3 from Sukovo to Dimitrovgrad station - 10,15km long.

Figure 2 – Railway Line in the Section Indicating the Three Phases of Work



This RAP has been prepared in response to the anticipated social impacts associated with the Project, primarily arising from the acquisition of private land in the Section area, which represents its most significant adverse social impact.

The territorial scope of this document coincides with the Project Aol in the Section area, that is the narrow corridor of the existing railway, along which most of the construction works are planned to take place and within which the key resettlement impacts are expected.



The RAP has taken into account the entire railway and road infrastructure in Section area connected to the railway Niš - Dimitrovgrad, the habits and needs of local communities, and the land and other resources they possess or use that may be affected by the Project.

The European Investment Bank (hereinafter: **EIB**) together with the Western Balkans Investment Framework is providing finance for the Section railway reconstruction and modernisation as part of the loan agreement signed with the Government of the Republic of Serbia. The Project is designed to meet the requirements of the Serbian national legislation and EIB's Environmental and Social Standards (hereinafter: **EIB ESS**), which provide guidance for its environmental and social sustainability.

This document presents, among other things, specific data, procedures, measures, and organizational responsibilities related to the involuntary resettlement and compensation of Project Affected Persons (hereinafter: **PAPs**) within the Section area. In practice, the implementation of this RAP should ensure that the acquisition of private land and structures, as well as any other restrictions of the property rights necessary for Project works, will be carried out in compliance with the EU standards.

Data sources: This RAP is based on the analysis of following main source of information:

- The Expropriation Study, which is primarily used to identify affected immovable properties and PAPs eligible for compensation;
- The results of the ongoing expropriation process in the City of Pirot and the Municipality of Dimitrovgrad (hereinafter: **Municipalities**) as of April 30, 2025 (Annex 2)¹;
- The results of the Socio-Economic Survey conducted in April 2025 (hereinafter: **the Survey**);
- Expropriation and Resettlement Tracker Reports provided to EIB by SRI.

The methodology applied during the preparation of this document combines the analysis of data mentioned above and the procedures and standards set out in the Resettlement Policy Framework ² (hereinafter: **RPF**) adopted for the entire Component by SRI in February 2025. The RAP contains required data, procedures, measures and operational responsibilities for the implementation of the principles and tasks envisaged by the RPF.

The Survey was carried out between 14 and 30 April 2025 with the aim of reviewing the ongoing and planned expropriation procedures in the affected municipalities, verifying the actual condition of properties and the characteristics of their owners, consulting key stakeholders, and assessing the potential social impacts of displacement, along with corresponding compensation and assistance measures. The Survey was conducted in accordance with primary data, EIB ESS and best domestic practice.

To adequately assess the anticipated impacts of displacement, distinct methodologies were employed during the Survey. Accordingly, three separate questionnaires were developed: one specifically designed to address the physical relocation of families from their homes, and the other tailored to cases involving only land acquisition cases. Third questionnaire was developed and used for the economic entities. The questionnaires used during the Survey are presented as Annex 3 to this document.

The main shortcoming in the preparation of this document was the limited scope of the available national Environmental Impact Assessment (EIA) report, which did not fully address all social aspects relevant to the Project. To compensate for this gap, a detailed analysis of available Project documentation was carried out, complemented by field visits, consultations with a wide range of stakeholders, reference to good practices from similar projects, and a comprehensive Survey conducted in the first half of 2025.

The RAP implementation is the responsibility of the Promoter.

¹ The Annex 2 presents a table containing all key data on private land plots and structures, affected by the Project, their owners/users, and the expropriation process applied to them. At the same time, this table serves as a monitoring tool for SRI to track the implementation of the expropriation process in the Municipalities.

² RPF is available in the following link: <https://infrazs.rs/wp-content/uploads/2025/02/Resettlement%20Policy%20Framework%20section%20Sicevo-Dimitrovgrad.pdf>



2. RAP PRINCIPLES, OBJECTIVES AND TASKS

Key principles of this RAP are:

- Resettlement and compensation for affected immovable property shall be carried out in accordance with applicable Serbian legislation and Standard 6 of the EIB ESS. In case of any discrepancies between them, the higher standard will apply.
- The loss of land and housing (physical displacement) and the loss of livelihoods (economic displacement) shall be minimized wherever feasible, while forced evictions shall be avoided.
- Livelihoods and living standards of affected persons shall be improved, or at least restored to pre-displacement levels, in the shortest timeframe.
- Compensation shall be provided prior to any land or property expropriation, at full replacement cost, except in exceptional cases and in accordance with procedure defined by the Serbian Law on Expropriation (such as: the absence of the owner, the lack of a probate procedure after the owner has passed away, the rejection of offers of fair compensation or failure to appear at an oral hearing on the offer of compensation, and other lengthy court proceedings related to the property).³
- Project related temporary displacement impacts, as well as any restrictions on property rights, shall be properly considered and compensated.
- EIB ESS shall apply to the displacement of persons without formal, traditional, or recognizable land use rights, provided they were occupying or utilizing the land before the cut-off date.
- Living conditions for displaced vulnerable persons shall be improved to at least minimum living standards, ensuring adequate housing and security of tenure.
- SRI shall implement measures to ensure that women have equal access to security of tenure and receive compensation on equal terms with men.
- Affected persons and communities shall be consulted to facilitate their participation in decision-making processes related to resettlement. Land acquisition and the provision of compensation shall be carried out with full disclosure of information and meaningful consultations.
- SRI shall manage an effective Grievance Mechanism, in compliance with the requirements set out in Standard 2 of the EIB ESS.
- Procedures shall be put in place to monitor and evaluate the implementation of this RAP, with corrective actions taken when necessary.

The main objectives of this RAP are:

- To minimize the negative displacement impacts of the Project within the affected area.
- To establish an efficient and legitimate framework for providing compensation and assistance measures to address unavoidable displacement impacts on PAPs.

Tasks of this RAP: To achieve these objectives in accordance with the above-mentioned principles, this document should fulfil the following key tasks:

- Describe Project activities in the Section area and the main displacement impacts on the affected population and communities;
- Provide an inventory of affected immovable property, including its owners and users;
- Present the socio-economic characteristics of PAPs in relation to expected displacement impacts;
- Present expropriation procedure and entitlements of affected PAPs, including specific compensation and support measures;
- Describe public consultation procedures and arrangements for document disclosure;
- Define the institutional responsibilities for RAP implementation, including the implementation timeline and budget;
- Establish procedures for monitoring and reporting on RAP implementation;
- Provide summary of key findings and the Promoter's implementation commitments.

The headings and content of this document have been structured in accordance with these tasks.

³ In these situations, the Promoter will, 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.

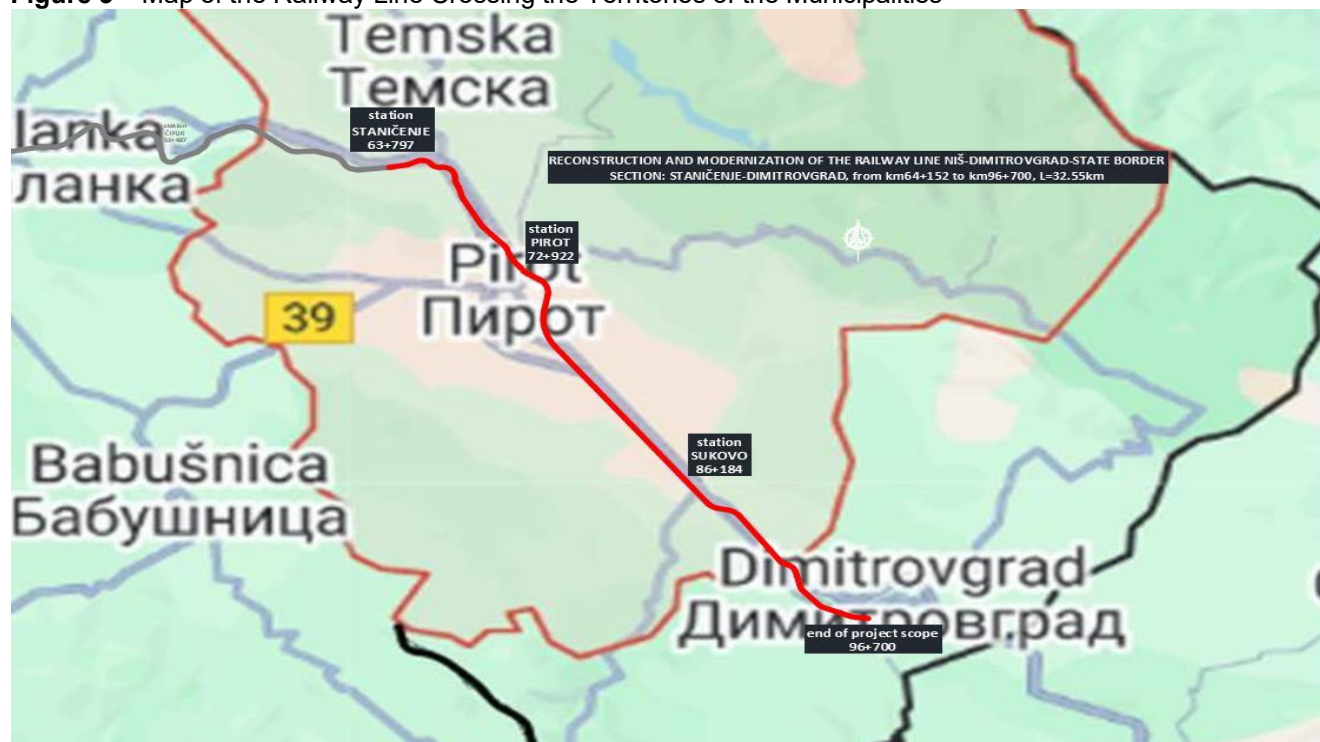
3. PROJECT DESCRIPTION

The railway: Corridor X is one of the most important pan-European transport corridors connecting Austria, Hungary, Slovenia, Croatia, Serbia, Bulgaria, Macedonia and Greece. The railway line Niš - Dimitrovgrad was built during the period 1885-1888, and it represents the only section of Corridor X stretching through the Republic of Serbia that is not electrified. According to the Agreement on International Goods Transport by Rail from 1985, the Niš - Dimitrovgrad railway is classified as one of the most important international railroad trunk lines in Europe (E 70). This railway line is also part of the Orient - East Mediterranean corridor, which connects Salzburg in Austria to Thessaloniki in Greece. Approximately 872km of this corridor is in Serbia, accounting for an estimated 23% of the country's total railway network.

The level of service and condition of the Niš – Dimitrovgrad railway line are not compatible with the importance it has for the Serbian and European railway network, which makes it unattractive for users and results in relatively low volume of traffic. Consequently, the reconstruction and modernization of this railway line is of exceptional national, but also regional importance, for both passenger and freight rail transport.

The Railway crosses the Pirot district, which is placed in the southeast of Serbia right next to the border with Bulgaria, and almost the entire territory of the Municipalities. The Pirot district is traditionally one of the economically less developed districts in Serbia, where many citizens have incomes below the national average, especially in rural areas. This region has a GDP per capita lower compared to other parts of Serbia, with a higher unemployment rate and a heavy reliance on agriculture. Its economy is largely dependent on traditional industries like footwear, metal processing, and food production, but faces challenges due to limited foreign investment. The region struggles with infrastructure limitations and low economic diversification.

Figure 3 – Map of the Railway Line Crossing the Territories of the Municipalities



Project rationale: Among important railway lines in Southeast Europe, the railway line Niš - Dimitrovgrad, is the only non-electrified, along with the short section on Bulgarian - Turkish border. It has the lowest level of signalling-interlocking and telecommunication system. Non-electrification and category D3 weight limits are main causes of bottlenecks on this line. The signalling and rail control system was commissioned more than 50 years ago and requires replacement, as it limits travel speeds to between 30 km/h and 50 km/h on certain sections of the railway line.



Given the above, it has been decided that the quality level of this railway line should be raised in the mid-term period by comprehensive modernization measures. The line should be repaired, electrified, equipped with modern signalling, interlocking and telecommunication devices and capable of combined transport. This would significantly increase the level of service, the competitiveness of the railway in relation to road transport on the corridor and alternative railway routes in Southeast Europe.

Works: In accordance with these objectives, the implementation of the Project includes the following main construction activities and expected results:

- Track Renewal and Modernization - Upgrading and reconstructing the railway infrastructure to enhance speed, safety, and capacity;
- Railway Electrification - Transition from diesel to electric rail operations to improve efficiency and sustainability;
- Upgrading Level Crossings - Enhancing safety and operational efficiency at key traffic intersections points along the route;
- Environmental Improvements - Reducing noise, emissions, and other environmental impacts.

Reconstruction phase of the Project envisages railway line improvement for speeds of 70-120 km/h, with raising the track category to D4 (22.5t/axle, 8t/m') and the upgrading of the track's freight gauge, which includes the following works:

- Complete replacement of the track undercarriage with the extension of the track;
- Replacement of all culverts and 5 bridges;
- Reconstruction of stations with useful track lengths of 750 meters;
- Replacement of the superstructure and transition to the 60E1 rail;
- Construction of new platforms in all official places;
- Arrangement of all stops with the construction of access roads and parking;
- Construction of underpasses and canopies at the Pirot station;
- Arrangement of all level crossings, with modern rubber panel road construction;
- Construction of noise barriers.

At this moment, works are underway at the location of Phase 1 (as of November 2023) and at the location of Phase 2 (as of March 2024). As for the location of Phase 3, a request for a building permit was submitted in November 2024 and it is expected that works will begin once the permit is issued.

Expected results: According to calculations, the capacity of the railway line after the reconstruction will be increased by approximately 8%. The average reduction of train running time after the reconstruction of the Component shall be:

- Regarding international passenger traffic about 26 min;
- In domestic passenger traffic about 16 min;
- In freight traffic up to 20 min.

The railway would remain single-tracked, so the works will mostly stay within the existing railway line. However, expropriation of private land will be necessary in territory of the City of Pirot and the Municipality of Dimitrovgrad.



4. DISPLACEMENT IMPACTS

The Project activities and construction works listed in previous chapters will directly impact property rights of certain categories of PAPs. So, this chapter presents the key physical and economic Project-related displacement impacts in the Section area. The study presented in Chapter 6 of this RAP will complement the data from this chapter and provide a comprehensive overview of the displacement impacts, both from the perspective of the Project documentation and ongoing expropriation procedures, as well as from the position of the PAPs.

The need for additional land outside the existing railway corridor (which is publicly owned) primarily arises from the planned railway expansion, which includes the installation of a new drainage system and the construction of more than 20 retaining structures. Accordingly, certain land parcels, along with associated assets, will be acquired for the purposes of the Project, resulting primarily in economic displacement, and to a lesser extent, in physical displacement.

4.1. Land Acquisition Impacts

The Expropriation Study, prepared for the purposes of the Project, covers 244 land plots and a total area of 104.4ha within the affected municipalities. However, 171 plots (approximately 70% of all plots required for the Project) were already publicly owned by the Republic of Serbia prior to the Project's launch and will therefore not be subject to expropriation. Consequently, expropriation was planned for 73 plots, of which 34 are publicly owned and 39 privately owned.

According to the available information from field observations conducted during the preparation of this document, the affected public plots in the Section area are not currently used for housing or income-generating activities by any informal users or squatters. However, it has been noted that some owners of adjacent private agricultural plots use these public areas to access their own parcels. Should this issue of access arise during subsequent stages of land acquisition or project implementation, it is planned to address it through direct negotiations between SRI and the owners of adjacent land, with the support of municipal representatives.

As of the preparation of this document, the expropriation process has been initiated for 66 plots - 34 in public ownership and 32⁴ in private ownership. The remaining 7 privately owned plots, although contained in the Expropriation Study, will not be affected by construction works and therefore do not require expropriation.⁵

Summary data on the land plots in Section area required for the implementation of the Project are presented in Table 1 below.

Table 1 – Public and Private Land Plots Affected by Expropriation

Ownership	Number of Entirely Acquired Plots	Number of Partially Acquired Plots	Total Area of Acquired Plots
Private	2	30	2563m²
Public	6	28	5003m²
Total	8	58	7566m²
	66		

As can be seen, most of the land required for the implementation of the Project in this Section (86% of all Project-required land plots) is publicly owned and will primarily be acquired through administrative transfer between public entities, or, to a lesser extent, through the expropriation procedure. Nevertheless, this document also accounts for any potential PAPs who may be using public land, including informal users or squatters. To date, Project

⁴ Mentioned 32 private plots include 2 land plots that are formally in public ownership but on which private persons have permanent land use rights.

⁵ The Expropriation Study is based on the Preliminary Design for reconstruction and modernization of the Nis–Dimitrovgrad railway line from 2019. This document includes a broader area than required by the Contractor for the purpose of execution of the planned works.

activities have not identified any informal users or squatters occupying the public land affected by the Project works. Should such cases arise in the future, their rights will be safeguarded in line with the adopted RPF, EIB ESS, and the Entitlement Matrix included in this RAP.

It is important to note that 98.3% of the private land required for the Project implementation is located in the territory of the City of Pirot (2520m²), while only 1.7% (43m²) will be purchased in the territory of the Municipality of Dimitrovgrad.

A total of 18 Cadastral Municipalities (hereinafter: **CM**) are affected by land acquisition, including 15 in Pirot and 3 in Dimitrovgrad. Of these 18 CMs, private land required for the Project's implementation is located in 9 CM - 7 in Pirot: Sopot, Pirot Van Varoš, Pirot Grad, Veliko Selo, Vojnegovac, Sukovo, Gradište, and 2 in Dimitrovgrad: Gojin Dol and Lukavica.

Table 2 – Public and Private Land Plots Affected by Expropriation (by Municipalities)

Municipality	Ownership	Number of Entirely Acquired Plots	Number of Partially Acquired Plots	Total Area of Acquired Plots
Pirot	Private	2 (452m ²)	25 (2068m ²)	2520m ² (33,5%)
	Public	5 (871m ²)	21 (3097m ²)	3968m ² (52,5%)
Dimitrovgrad	Private	0	5 (43m ²)	43m ² (0,5%)
	Public	1 (278m ²)	7 (757m ²)	1035m ² (13,5%)
Total:	Private and public	8 (1601m ²)	58 (5965m ²)	7566 m ² (100%)

The Table 2 shows that according to Expropriation Study only two private land plots are planned for full expropriation, which is a direct consequence of the linear characteristics of the Project and SRI's efforts to minimise displacement of PAPs. The remaining 30 private land plots will be partially acquired. Among the partially affected land plots only those ones that would become economically unviable after the purchase of their parts will be expropriated from owners in their entirety.

According to the available data, 60 private individuals (both legal and natural persons) have ownership rights over 32 land plots, indicating an average of approximately 1.8 owners per plot. This figure represents an average value, while actual ownership varies from plot to plot and is detailed in Annex 2.

The average area of land subject to expropriation per owner is approximately 42.7 m². This relatively small area of land loss per individual owner suggests that the anticipated impacts in terms of physical displacement and/or loss of income sources are limited and, in some cases, negligible.

This indicator supports the conclusion that the overall socio-economic displacement impact is expected to be minor. However, even small portions of land may have high functional importance, especially when they provide access to the remaining part of the plot or to adjacent parcels. For this reason, it is particularly important that the expropriation process is carried out in a way that preserves the owners' access to and usability of their remaining and surrounding land.

Regarding the type of private land planned for expropriation, 22 agricultural land plots (1558m²) and 17 construction land plots (1366m²) will be acquired for the Project needs. Apart from the fact that the above cadastral data should be understood as a tentatively, field research and discussions with landowners have confirmed most of the formally agricultural plots are not used for agricultural purposes.

The Annex 1 contains general data on the land plots that are listed in the Expropriation Study. On the other hand, specific data on individual land plots subject to the expropriation procedure, their owners and the status of the procedure itself are provided in the Annex 2 to this RAP and are not available to the public due to protection of personal data.

So far, the expropriation process is being conducted in a lawful and efficient manner, in compliance with the Serbian laws and EIB ESS.

4.2. Impacts on Structures Affected by the Project

As already said, during the development of the Project, avoiding or minimizing the extent of people displacement from their homes was a key consideration throughout all phases of planning and design. However, the Project activities will cause the resettlement of three families from their dwellings, all in Pirot.

The engaged social expert within the Engineer's team conducted detailed interviews with members of all three households affected by displacement from their homes and identified several vulnerability factors indicating the need for a tailored approach and specific assistance during the resettlement process. Accordingly, each affected household will be approached individually and in a timely manner by SRI to discuss, agree and implement the most suitable resettlement options. Promoter will monitor the affected families' satisfaction levels with the new housing conditions.

The locations and photos of the structures planned for demolition are presented in the Annex 4.

4.3. Businesses and Agriculture Affected by the Project

Business entities: The Expropriation Study indicates that for the purposes of Project implementation two land plots with a total area of 45m² will be partially expropriated from two registered companies – one of them is in bankruptcy proceeding. In addition, another land plot in Pirot is jointly owned by individual entrepreneurs and their corresponding sole proprietorships. Not a single square meter of the three plots planned for expropriation is currently being used to generate income.

The Survey has been conducted with the available representative of the affected entities, and it was confirmed that the land in question is not used for business purposes, that it consists of small parts of plots which do not contribute to generating profit, and that there will be no negative economic impact on the mentioned business entities. On the contrary, the bankruptcy trustee is satisfied with the outcome as it will allow them to liquidate part of the assets and partially settle creditor claims.

Farmers: When it comes to the impact of economic displacement on farmers (who make up a significant part of the population in the Section area), it should first be noted that only 22 private plots of agricultural land are planned for expropriation. This is an area of 1588 m², but in practice a smaller portion of the land is used for agricultural purposes, which has been confirmed by the social survey. The Survey showed that four out of five respondents (82%) stated that the expropriated land did not generate any income, indicating limited economic dependence on the land itself. In any case, every owner or user of a land plot used for agricultural production will be entitled to all rights guaranteed by the Entitlements Matrix.

Agricultural Lease: The Social Survey has shown that only 30m² of the land plot affected by expropriation is leased for agricultural purposes. This concerns a part of a private plot located near Pirot. On the other hand, there is no evidence that any public land planned for expropriation is currently leased for agricultural production. If such a case arises, the SRI and the competent municipality will seek to find adequate replacement land for further lease.

4.4. Temporary Impacts on Immovable Property

During construction, some additional land often is needed for material laydown areas, machine parking, waste disposal, etc.

At this time, it is not possible to assess the exact locations or duration of temporary land occupation. However, SRI and the Contractor are obliged to carry out the process of temporary land acquisition in accordance with the EIB ESS, through the implementation of the following measures:

- Wherever possible, publicly owned land will be used for these purposes.
- SRI and Contractor will timely engage with local authorities and landowners to minimize social risks and conflicts related to temporary land acquisition.
- If temporary use of private land cannot be avoided, the Contractor shall be obligated to lease the land from the owner and to pay for the leased land according to market price before the works.



- The Contractor must ensure that the necessary land is appropriately secured before commencing work. Any temporary land use must be carried out in a manner that does not cause damage to private or public property. If any damage occurs, the SRI and/or the Contractor are required to compensate for it in shortest term or restore the property to its pre-construction condition.
- Temporary land occupation must not put vulnerable individuals and families in a more difficult health situation or prevent their movement or ability to generate income.
- Leasing agricultural land that is used for farming should be avoided as much as possible, especially if it constitutes the sole income of the owner.

4.5. Permanent Restrictions on Land Use

According to the Serbian Railway Law, certain land use outside of the railway corridor⁶ will be permanently restricted in the following zones:

- **Infrastructure zone** with a width of 25m from the axis of the outermost tracks (this includes the railway corridor) where 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) and
 - That all approvals provided by SRI are granted (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 corridor) where 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 corridor) where the owners of the land are obliged to remove mature crops in a timely manner and, if needed, undertake other fire protection measures.

To mitigate the said impacts, the SRI will grant approval for construction in all cases when the safety of the railway traffic and the associated structure are not jeopardized. In cases when that is not possible, the SRI will cooperate with landowners and suggest changes that need to be made on the planned structure or its location, so that approval may be granted. Landowners affected by the aforementioned restrictions may contact SRI through the Grievance Mechanism (subchapter 8.3.) to request construction approval and/or identify alternative solutions for any outstanding issues.

4.6. Permanent Closure of Level Crossings

Although the planned construction works along the Section are confined to a narrow strip adjacent to the existing railway track, certain design solutions will result in the permanent closure of 7 to 9 level crossings, out of a total of 24 located within the Section area. This impact, although primarily resulting in community severance, and to a lesser extent in land acquisition, should be considered primarily as a change in the infrastructure capacity of local communities due to Project activities.

Although a national Environmental Impact Assessment (EIA) was conducted, certain aspects, particularly those related to social impacts and local infrastructure, required further elaboration. As such, this information is presented here considering that the planned permanent closure of level crossings constitutes the most significant impact of the Project on local road infrastructure.

All level crossings that will not be closed will be equipped with a road structure made of rubber panels, secured and illuminated, which will overall make local traffic improved and safer.

During the construction works, SRI and the Contractor will ensure the diversion of traffic from the level crossings under construction to the nearest alternative crossings.

⁶ The railway corridor is the land strip on both sides of the railway line, extending 8 meters in width, or 6 meters in populated areas, measured from the centerline of the outermost tracks.

Table 3 – Level Crossings in the Section Planned for Permanent Closure

No.	Phase	Location	Status	Road Category	Mitigation Measures
1.	1	67+233	Request for cancellation submitted	Municipal (field) road	The cancellation request is under consideration; traffic would be diverted to the level crossing at km 67+503 (270m away)
2.	1	69+020	Request for cancellation submitted	Municipal (field) road	The cancellation request is under consideration; traffic would be redirected to the level crossings at km 67+503 (1,517m away) and at km 70+990 (1,970m away)
3.	1	70+141	Canceled	Municipal (field) road	Diverted traffic to level crossing at km 69+020 (1,121m away)
4.	2	74+228	Canceled	City street (Berilovački put)	Diverted traffic to level crossing at km 74+259 (31m away)
5.	2	80+422	Canceled	Municipal (field) road	Diverted traffic to level crossing at km 79+551 (871m away) and road crossing at km 81+745 (1,323m away)
6.	2	82+476	Canceled	Municipal (field) road	Diverted traffic to the level crossing at km 81+745 (731m away), to the culvert in the function of the underpass at km 83+935 (1,459m away) and to the level crossing at km 84+594 (2,118m away)
7.	3	88+560	Canceled	Municipal road	Diverted traffic to the overpass at km 88+620.00 (160m away)
8.	3	94+221	Canceled	Municipal road, connection with the settlement of Željuša	Diverted traffic to level crossing at km 93+605 (616m away) and level crossing at km 94+687 (466m away)
9.	3	96+375	Canceled	Municipal road, connection with the settlement of Željuša	Diverted traffic to level crossing at km 94+687 (1,688m away) and level crossing at km 96+897 (522m away)

4.7. Project Impacts on Vulnerable Groups

Various individuals or groups are considered more vulnerable than others and, if affected by the infrastructural project, will require the implementation of special livelihood restoration and/or assistance measures.

For the purposes of this RAP, vulnerable persons are defined in accordance with EIB ESS 6 and include individuals or households who, due to age, disability, gender, minority status, poverty, or lack of legal land tenure, are at higher risk of adverse impacts and require additional support to restore their livelihoods and living standards.

Considering the above-mentioned displacement impacts, it is evident that the most significant adverse effects of the Project will be experienced by the households subject to physical displacement. Accordingly, the Survey prioritized the three affected families, as all other anticipated impacts on PAPs are considerably less severe. While some owners of land parcels subject to expropriation may belong to vulnerable groups, the Project is not expected to result in significant impacts on their livelihoods or standard of living. Consequently, tailored livelihood restoration support is generally not anticipated to be required in these land acquisition cases.

On the other hand, each of the three families affected by resettlement from home is vulnerable in specific ways. During the field visit and the Survey, the following vulnerability risks among these families were identified:

- Aging in two of three families;
- Poverty in all three families;



- Disability in one of three family;
- Household with multiple members in one of three family.

For this reason, the SRI will take measures to ensure:

- Maintain ongoing and inclusive communication with all three households throughout the resettlement process;
- Provide timely and clear notification at least six months before any displacement occurs;
- Offer suitable resettlement solutions, including replacement housing or cash compensation, aligned with the households' preferences (The Promoter shall apply the basic standards of adequate housing prescribed by Article 79 of the Law on Housing and Building Maintenance of the Republic of Serbia, taking into account and, where possible, applying the recommended standards set out in Article 90 of the same law);
- Provide relocation support, including assistance with the transport of belongings and facilitation of legal and administrative steps;
- Ensure post-resettlement follow-up to evaluate the adequacy of housing solutions and address any outstanding needs.

If additional vulnerable individuals and households appear during the further Project activities, SRI will take appropriate measures, including cooperation with Centres for Social welfare and/or Health care centres in Pirot and Dimitrovgrad to ensure required assistance and support.

In cases where a child affected by the Project belongs to a vulnerable family, has special needs, or has been identified as being at risk of neglect, the Promoter shall notify the competent Centre for Social Work in order to ensure additional protection of the child's rights.



5. COMPENSATION ELIGIBILITIES AND ENTITLEMENTS

According to RPF, any displaced or other person whose property rights are negatively affected by the Project is eligible for the following types of compensation and/or support:

- **Monetary compensation** for expropriated property, diminished rights, or incurred costs, provided in accordance with a court ruling or agreement, based on the assessment of a certified appraiser.
- **Replacement property**, including residential, commercial, or agricultural structures, or land parcels, provided either permanently or temporarily, depending on the availability of resources and the preferences of PAPs.
- **Resettlement assistance**, which may include administrative, legal, financial and physical support to resettled PAPs or affected vulnerable people. This assistance usually covers the transportation of belongings and people, support in obtaining personal identification documents, assistance to access social welfare or health services, livelihood restoration support for PAPs who lost employment, etc.

A detailed description of the aforementioned categories of compensation and assistance is provided in Chapter 8 of the RPF.

The following Entitlements Matrix serves as a comprehensive reference, detailing the types of potential impact, eligibility criteria, and the corresponding compensation and/or support for each category of PAPs.

Table 4 – Entitlements Matrix

TYPE OF POTENTIAL LOSS/IMPACT	CATEGORY OF AFFECTED PERSON/ ENTITY ⁷	ENTITLEMENTS
Permanent loss of privately owned land	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.
	Informal / Formal user of land (tenant)	To be informed about the land acquisition at least six months before 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.
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 perennial plants (including losses stemming from land use restrictions)	Owner of perennial plants (fruit trees / vines)	Cash compensation for lost perennial yields and timber (if applicable), at full replacement cost ⁸ , 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 ⁹ , as determined by certified appraisers.

⁷ Eligibility is determined by Municipalities' officers based on legal documentation for those with formal rights, whereas for informal users it is based on their presence in the Project area at the time of the Survey.

⁸ 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.

⁹ 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 ⁷	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. User of the structure/ premises	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; 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 Socio-Economic Survey	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.
	User of the structure/ premises	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 using the structure/ premises to find an alternative option and vacate Project affected structure/ premises.
The obligation to request approval from SRI in the process of obtaining a construction permit for the construction of new structures on privately owned land within the protected land zones next to railway corridor	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 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 support (e.g. help with personal documents, opening a bank account, or accessing local social or health services)
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.



TYPE OF POTENTIAL LOSS/IMPACT	CATEGORY OF AFFECTED PERSON/ ENTITY ⁷	ENTITLEMENTS
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 this RAP and the RPF.

Due to the unavailability of suitable publicly owned land for in-kind compensation, it is expected that all affected landowners will receive cash compensation. The only PAP currently planned to receive replacement housing from the Promoter is a retired employee of SRI who is subject to physical resettlement.

As for impacts on economic and agricultural activities, the data collected so far indicate that a very small area of the land planned for expropriation is being cultivated or leased, i.e. used for income generation. In this regard, no significant compensation payment is expected for business premises, land improvements, planting of agricultural crops or trees, etc. During the preparation of this document, only one case was recorded where acquisition of the land plot subject to expropriation was leased for agricultural activities. However, each case of displacement from land used for income generation must be compensated in a timely manner to its owners or users, in accordance with the Entitlements Matrix above.

SRI will make every reasonable effort to provide appropriate assistance to households that will be displaced from their homes as a result of the Project. This support will be delivered in accordance with the Entitlements Matrix presented above, national best practices, and tailored to the specific needs and vulnerabilities of the affected households.

Cut-off date: April 30, 2025, has been preliminarily determined as the final cut-off date. This is the date when social expert concluded interviews with individuals affected by expropriation and it serves as the final date after which any changes in ownership structure, improvements, additions to structures, crops, or other assets will no longer be considered in the compensation determination.

Since the three Project reconstruction phases correspond to three different geographic locations within the Section area, SRI submitted expropriation proposals to the Municipalities in a phased and sequential manner. Consequently, individuals affected by the expropriation were informed by municipal officials about the extent of the impact on their property, as well as their rights and obligations in the expropriation process, at different times. April 30, 2025, is established as the final cut-off date, by which all available affected property owners were duly informed about the legal consequences of the expropriation process.

All PAPs identified to date were informed of the cut-off date during the Survey and will be further notified, if necessary, during the expropriation process by the competent municipal property departments.



6. SOCIO-ECONOMIC SURVEY

6.1. Methodology and Scope of the Survey

This section presents the findings of the Survey conducted in April 2025 in Municipalities by the social expert engaged under the Technical Assistance to SRI. The Survey was organized and prepared in direct collaboration between the social expert, the SRI, and the Municipalities. It is based on available preliminary data from the Expropriation Study, ongoing expropriation procedures, and SRI's Expropriation and Resettlement Tracker Reports submitted to the EIB. The Survey complements these data from the socio-economic point of view and, together with them, provides a detailed insight into the progress of the expropriation process so far and its main challenges.

The primary objectives of the Survey were to establish a comprehensive socio-economic profile of PAPs, to identify their vulnerabilities, potential risks of the expropriation process, as well as to support design and implementation of appropriate mitigation and support measures in line with EIB ESS. The collected data provide insights into the demographic composition, income sources, education levels, housing conditions, and social vulnerability of PAPs. Additionally, the Survey assessed PAPs awareness of their rights, compensation preferences, and overall perceptions of the Project, including anticipated impacts and perceived benefits or concerns.

The Survey was implemented in two phases. The first phase involved the collection and analysis of secondary data, while the second phase focused on gathering and analysing primary data through specially designed questionnaires and interviews with available PAPs.

The Survey covered both physically displaced households and those affected by land acquisition without requiring relocation. General socio-economic indicators (e.g. age, gender, education level, income sources, legal ownership status) were analysed collectively for all respondents. However, physically displaced households were asked a set of additional questions tailored to capture relocation-specific vulnerabilities and housing conditions. Third questionnaire targeted business entities impacted by partial land acquisition.

Based on the available data, it became evident that the most significant negative impacts of the Project were related to the physical displacement of three households from their dwellings. So, a specific vulnerability assessment was conducted for these cases. This assessment followed EIB ESS and RPF guidance, combining objective socio-economic indicators with context-specific criteria to identify vulnerable PAPs requiring special assistance.

The assessment considered the following factors:

- Household size and composition;
- Income level and diversity of income sources;
- Employment status;
- Ownership or tenancy rights over affected properties;
- Presence of chronic illness, disability, or other health-related needs;
- Presence of minor children;
- Female-headed households;
- Receipt of social support or entitlements;
- Education levels;
- Outstanding housing-related debts;
- Expressed concerns and perceptions regarding relocation.

These vulnerability indicators were integrated into the socio-economic questionnaire for physically displaced households, enabling the identification of PAPs in need of additional support to ensure a fair, equitable, and sustainable resettlement process. The assessment was not extended to land acquisition cases, as the affected land plots were subject to partial land acquisition in 94% of cases, mostly involving limited areas of land. These plots were, in most cases, not used for income generation, as confirmed by the survey results.

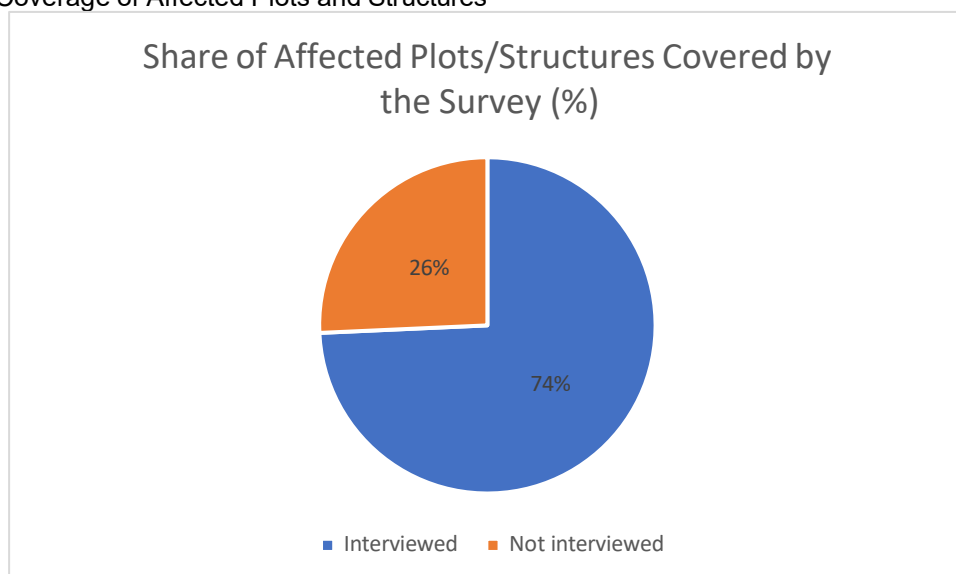
A total of 32 interviews, conducted either face-to-face or by telephone, were carried out within the Section area. In cases where the landowner was unavailable, a close household member knowledgeable about the land was interviewed.

Among the 32 interviews, 3 were with physically displaced households, 1 with a representative of an affected business entity, and the remaining 28 with landowners whose plots are partially or fully affected by the Project's land acquisition. Only two potential respondents declined to participate: one through a legal representative without providing a reason, and another due to illness.

Interviews were conducted for approximately 74% of the private plots and structures affected by land acquisition (26 out of 35), ensuring that at least one owner or user was consulted for each.

As some individuals own multiple plots, while certain plots are co-owned by more than one person, the total number of surveyed ownership instances is 40, which serves as the primary unit of analysis in this Survey. The number of ownership instances (i.e., expropriation cases) was used as the key analytical parameter, as it most accurately reflects the number of individual legal and property relationships subject to expropriation.

Figure 4 – Survey Coverage of Affected Plots and Structures



Source: Survey, RAP, 2025.

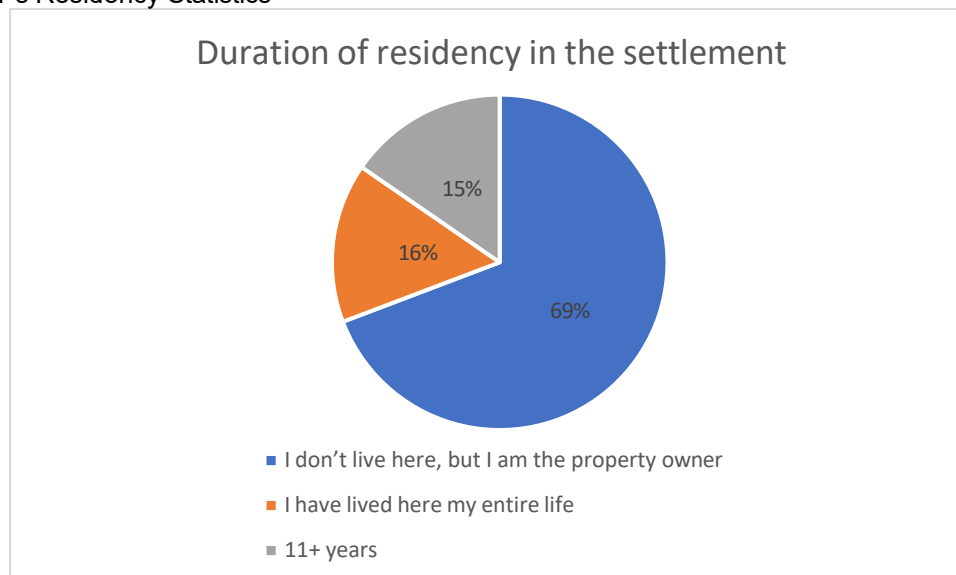
Interviews with PAPs were initially conducted at the premises of the City of Pirot on April 14th and 15th, 2025. While some interviews were successfully completed in this setting, a significant number of property owners were elderly or did not reside within the Section area. Consequently, the social expert adapted the approach and carried out in-person visits at locations more convenient for the respondents.

Achieving the target number of respondents proved particularly challenging, as many affected individuals do not reside in the settlements where the expropriated land is located. In several instances, registered property owners had deceased, and no legal heirs could be identified.

The majority of respondents (69%) indicated that they do not reside in the settlement but own property there. Only 16% reported having lived in the settlement their entire lives, while 15% have been residing there for more than 11 years.

This suggests that a significant share of PAPs is connected to the Section area through land ownership but does not reside there permanently.

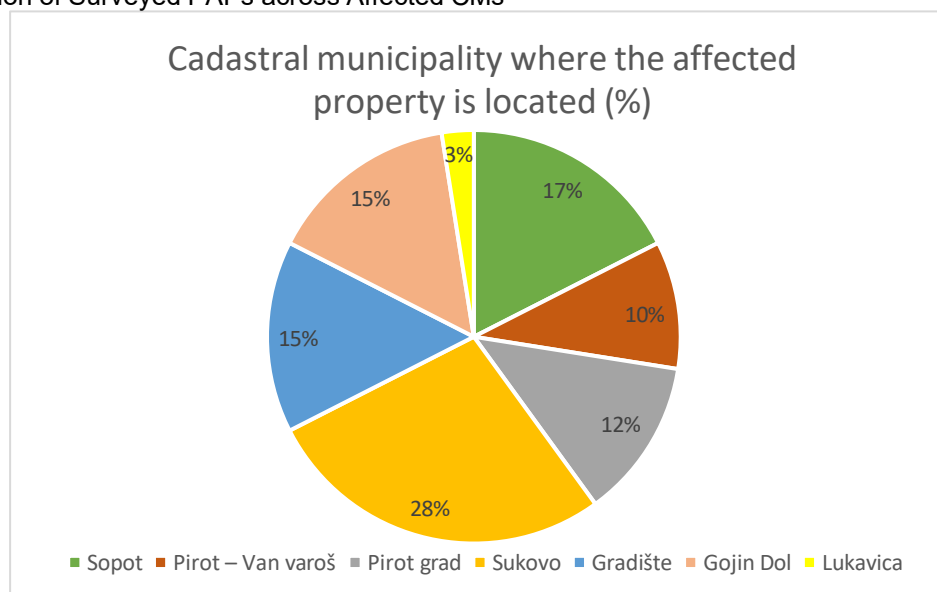
Figure 5 – PAPs Residency Statistics



Source: Survey, RAP, 2025.

The geographic area covered by the Survey includes the following 7 CMs directly affected by the economic and physical displacement of PAPs: Sopot, Pirot Van Varoš, Pirot Grad, Sukovo, Gradište, Gojin Dol, and Lukavica. The number of interviews conducted in each settlement was determined primarily by the location and concentration of land plots subject to expropriation, rather than by population size or administrative status. Consequently, higher representation from some CMs, such as Sukovo or Sopot, reflects the greater extent of land acquisition in those cadastral areas.

Figure 6 – Distribution of Surveyed PAPs across Affected CMs



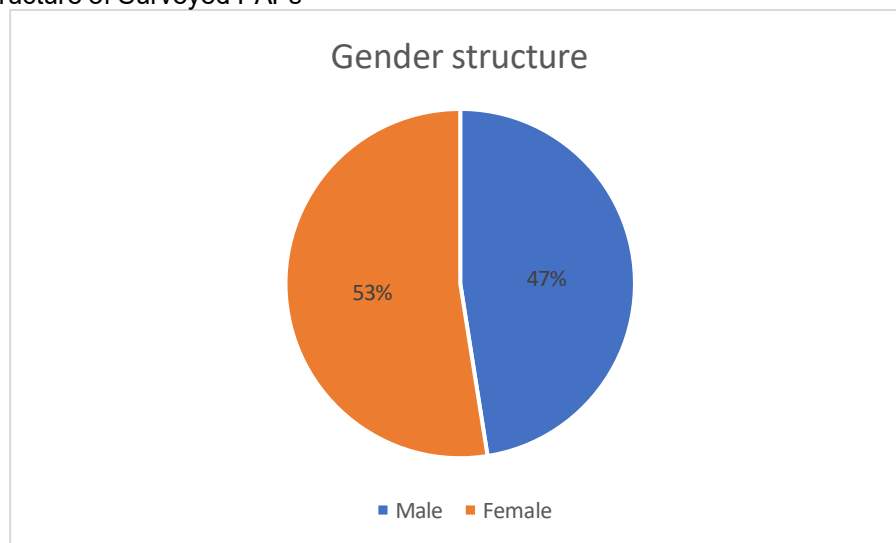
Source: Survey, RAP, 2025.

All interviews were conducted directly by the social expert, who read each question aloud and recorded responses as provided. Completed questionnaires were entered into the Statistical Package for the Social Sciences (SPSS) with the informed consent of the PAPs, for the purpose of statistical analysis. All data collected through the questionnaires and interviews were anonymized and securely stored, ensuring compliance with applicable ethical standards and data protection requirements.

6.2. Demographic Profile, Education, Employment and Income of Surveyed PAPs

Regarding the gender composition of the Survey, female owners/users of the property affected by expropriation accounted for 53% of respondents, while male respondents accounted for 47%. All three households identified for physical relocation were represented during the interviews, with both members of each couple participating.

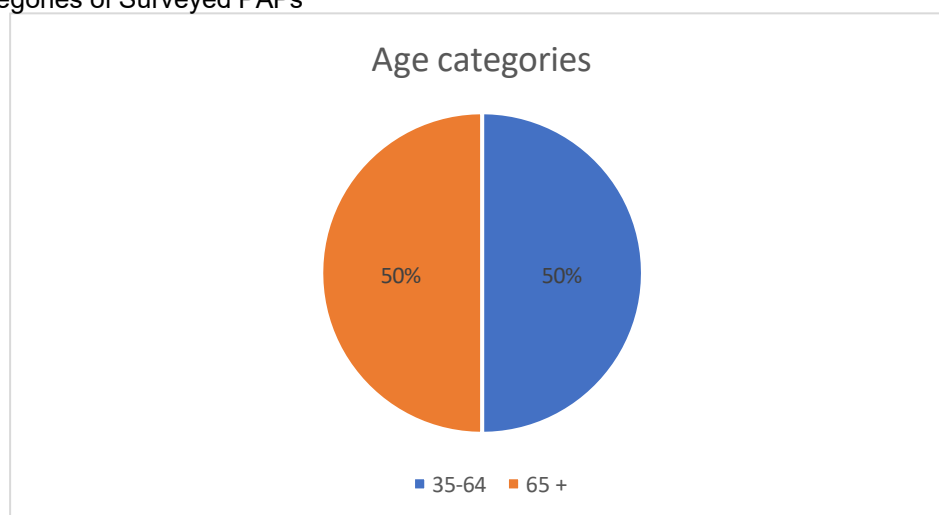
Figure 7 – Gender Structure of Surveyed PAPs



Source: Survey, RAP, 2025.

Regarding the age structure of respondents, the surveyed PAPs are evenly distributed between two older age categories. Half of the owners/users (50%) are between 35 and 64 years old, while the other half (50%) are 65 years of age or older. This indicates that the affected population is predominantly middle-aged or elderly, with no recorded participation of individuals below the age of 35 in the interviews.

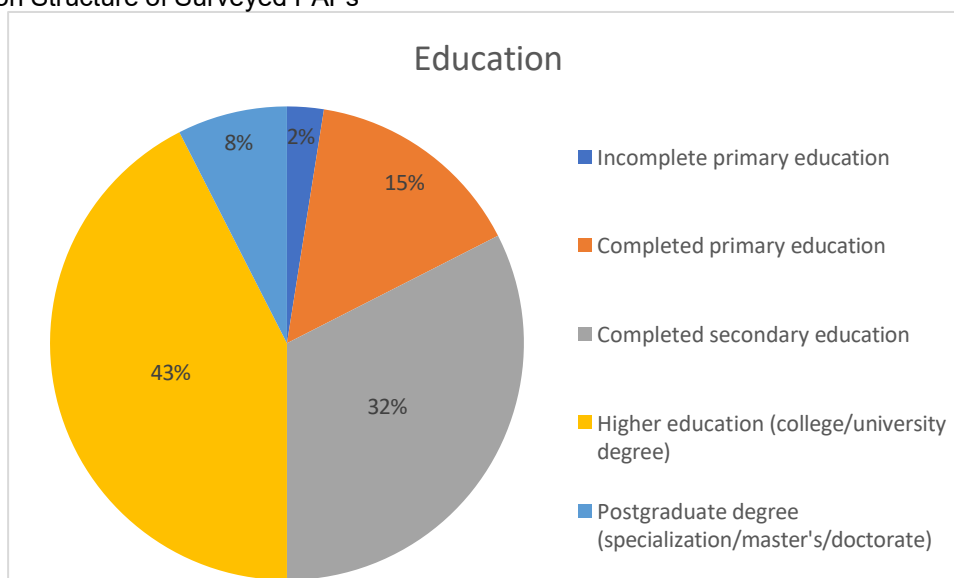
Figure 8 – Age Categories of Surveyed PAPs



Source: Survey, RAP, 2025.

In terms of education, a relatively large proportion of PAPs hold higher education qualifications. Specifically, 43% have completed university or college-level education, and an additional 8% possess a postgraduate degree, bringing the total share of tertiary-educated individuals to 51%. Among the remaining respondents, 32% completed secondary education, while 15% completed only primary education. A very small share (2%) did not complete primary school.

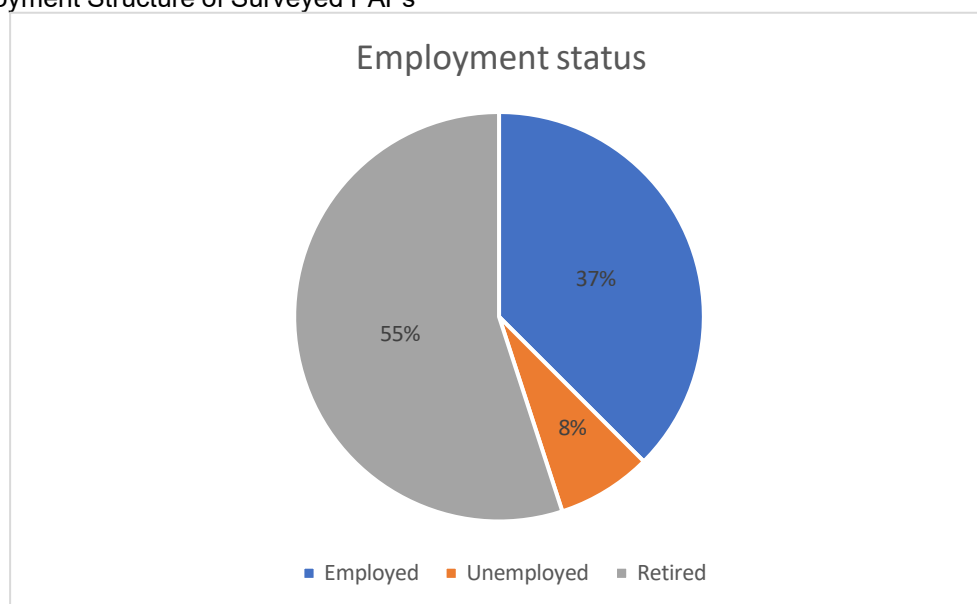
Figure 9 – Education Structure of Surveyed PAPs



Source: Survey, RAP, 2025.

The following charts illustrate the relation between employment and income structure among PAPs. Namely, 55% of PAPs are retired, 37% employed, and 8% unemployed at the time of the survey.

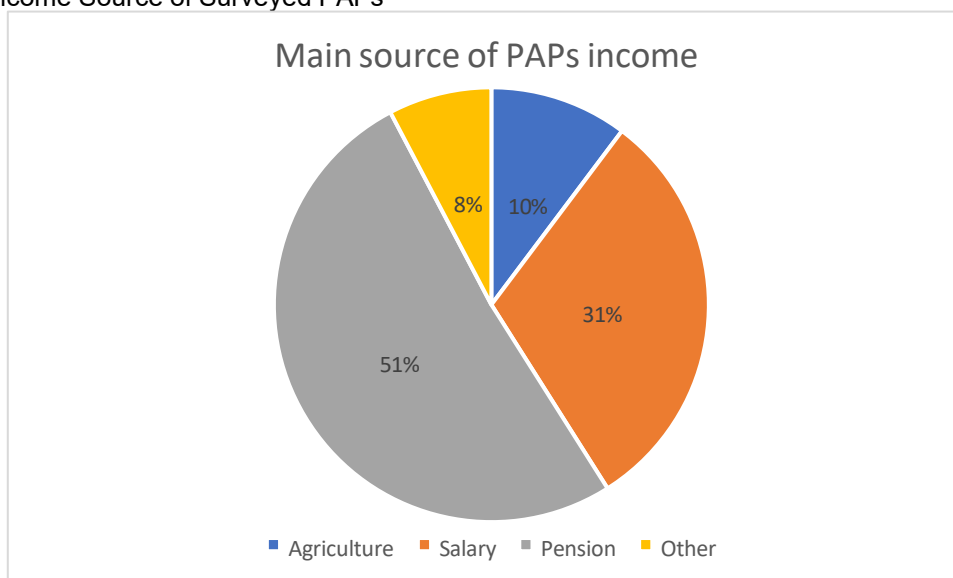
Figure 10 – Employment Structure of Surveyed PAPs



Source: Survey, RAP, 2025.

In parallel, pensions are the most frequently reported primary source of income among surveyed PAPs, with 51% of respondents indicating this category. Salaries followed at 31%, while 10% reported agriculture as their main income source. An additional 8% rely on informal or occasional work. This income distribution suggests that the high percentage of PAPs are not primarily dependent on land-based economy.

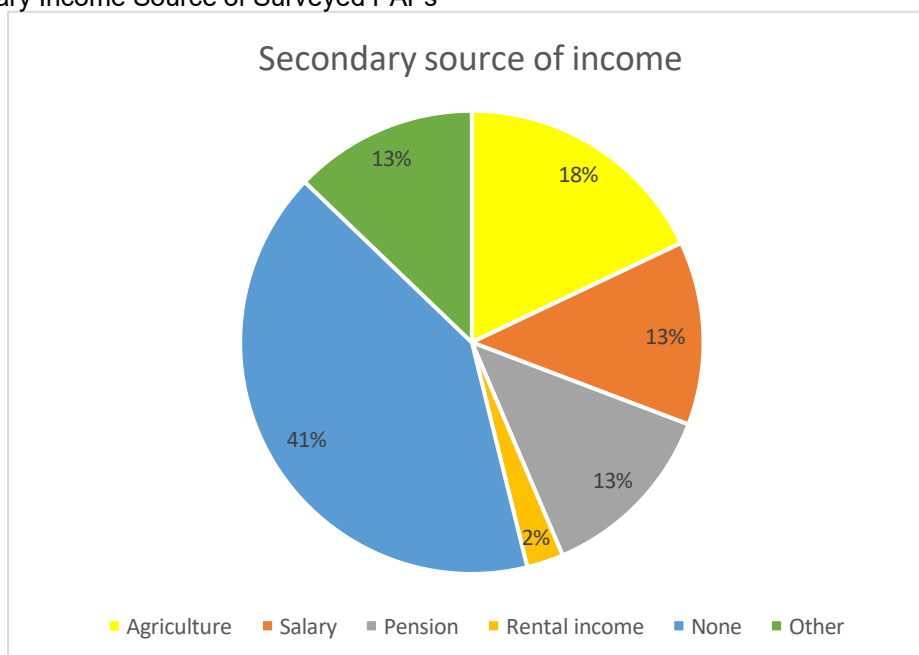
Figure 11 – Main Income Source of Surveyed PAPs



Source: Survey, RAP, 2025.

The largest share of interviewed PAPs (41%) indicated that they do not have any income beyond their primary source. Among those who do, the most common secondary source is agriculture (18%), followed by salary, pension, and other sources - each accounting for approximately 13% of responses. Rental income was reported by only one respondent (3%).

Figure 12 – Secondary Income Source of Surveyed PAPs



Source: Survey, RAP, 2025.

6.3. Immovable Property Tenure and Expropriation Impacts

Among all respondents, 64% identify as co-owners of the expropriated land, while 31% are sole owners. In addition, 5% report being tenants. This percentage of tenants includes employees of SRI who reside in company-owned properties that are subject to resettlement.

Ownership status in relation to expropriated plot

Ownership Status	Percentage
Sole owner	31%
Co-owner	64%
Tenant	5%

Rental status of affected plots

A pie chart titled 'Rental status of affected plots' showing the distribution of rental status. The chart is divided into two segments: a large orange segment representing 'No' at 95%, and a small blue segment representing 'Yes' at 5%. A legend at the bottom identifies the colors: blue for 'Yes' and orange for 'No'.

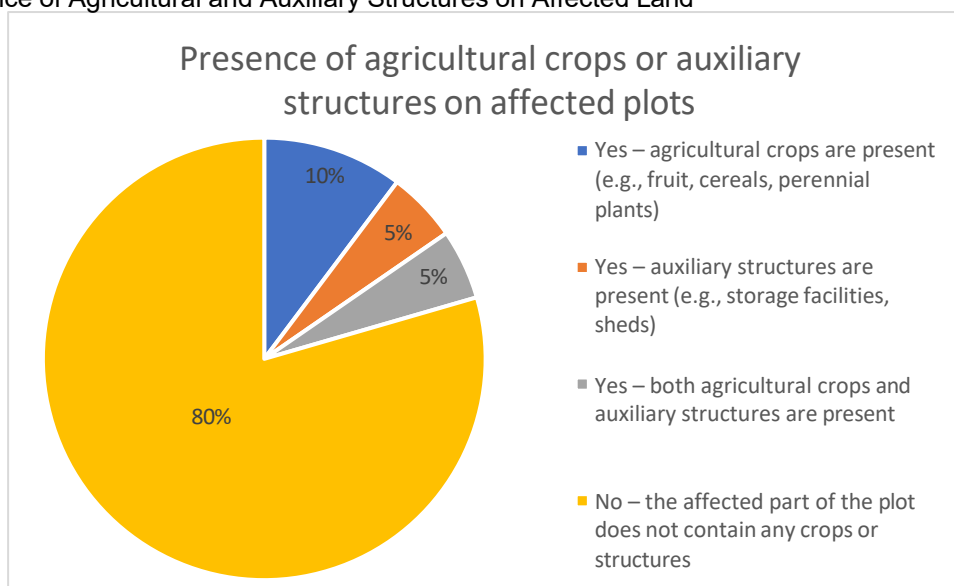
Rental Status	Percentage
Yes	5%
No	95%

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productive land use or physical assets. These findings are consistent with the overall Project approach, which involves acquiring narrow strips of land, primarily located along existing railway infrastructure.

Among the remaining respondents, 10% reported the presence of agricultural crops (such as fruit trees, cereals, or perennial plants), while 5% indicated the existence of auxiliary structures (e.g., storage facilities or sheds). An additional 5% reported that both crops and auxiliary structures were present on the affected land.

Figure 15 – Presence of Agricultural and Auxiliary Structures on Affected Land



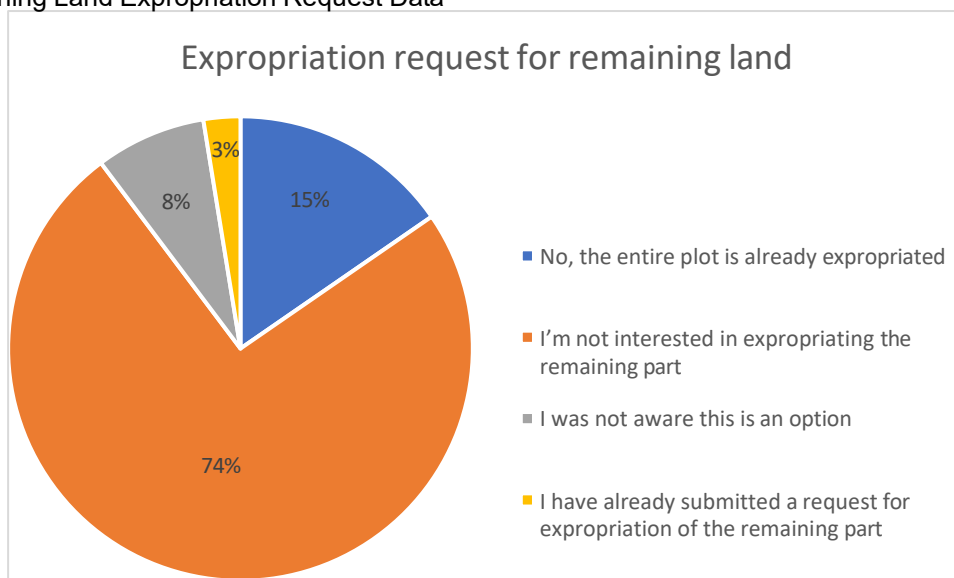
Source: Survey, RAP, 2025.

Based on the expropriation requirements defined in the Expropriation Study, 30 out of the 32 affected land plots (94%) will be subject to partial acquisition, while only 2 plots (6%) will be acquired in full. In addition, a decision has been made to proceed with the full expropriation of one more privately owned land plot, following the approval of the owner's request.

Most respondents (74%) stated that they do not intend to request the expropriation of the remaining part of the affected plots. This is consistent with the nature of the land acquisition under the Project, which primarily involved partial expropriation of small portions of land, limited to what was strictly necessary for construction works. Approximately 15% of respondents indicated that their entire plot had already been expropriated. A small portion (8%) reported they were not aware of the possibility to request expropriation of the remaining part; however, in most of these cases, such a legal option likely did not exist due to the minimal extent of acquisition and the continued usability of the remaining land.

Only one respondent (3%) reported having submitted a request for the expropriation of the remaining part of the plot. According to available information, this request was reviewed and approved because the remaining portion of the land no longer held independent economic or functional value.

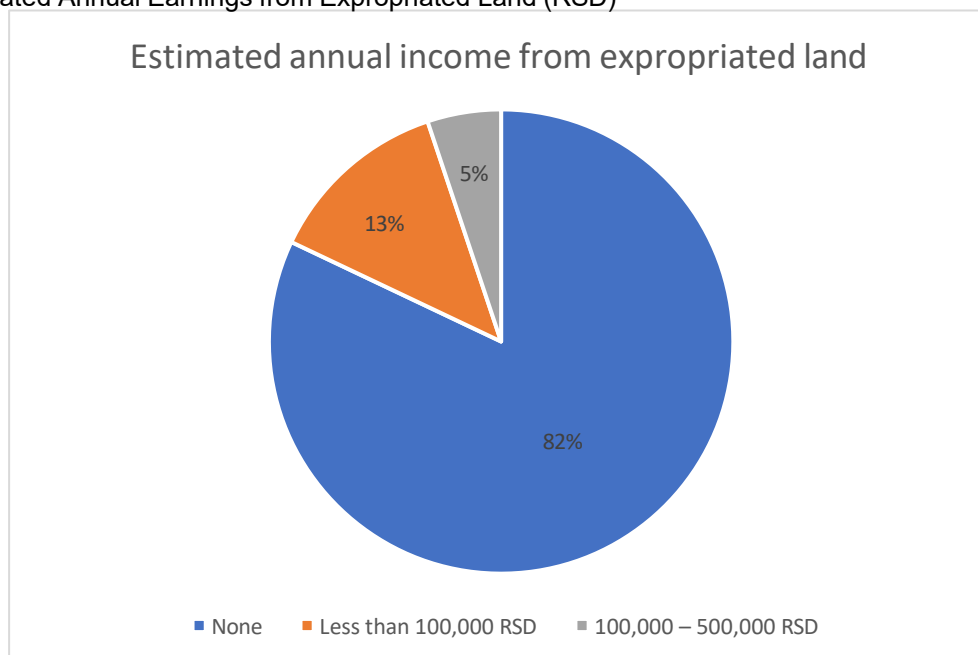
Figure 16 – Remaining Land Expropriation Request Data



Source: Survey, RAP, 2025.

The Survey showed that for the majority of PAPs (82%), the expropriated land did not generate any income, indicating limited economic dependence on the land itself. Among those who reported income from land, 13% earned less than 100,000 RSD annually from the affected land, while only 5% reported higher income (between 100,000 and 500,000 RSD).

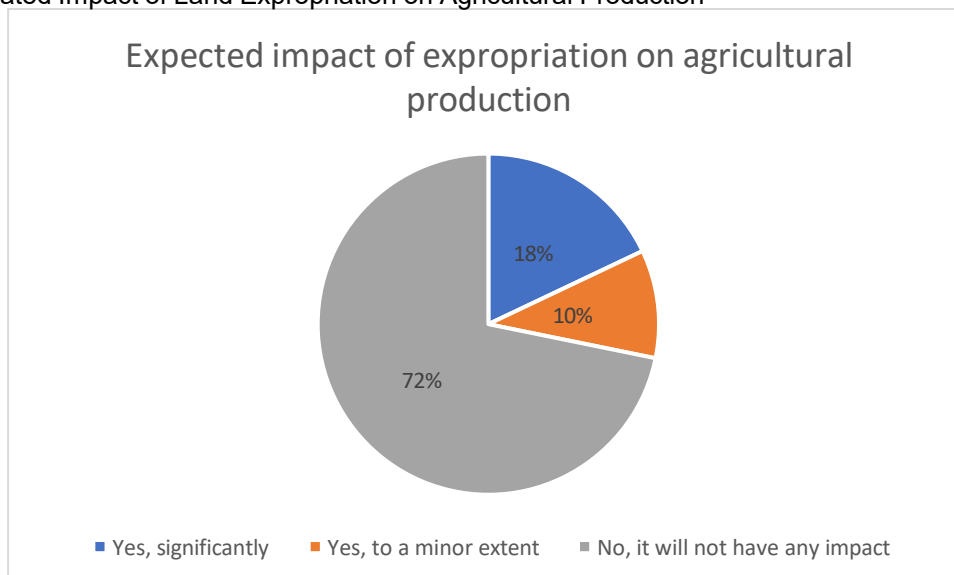
Figure 17 – Estimated Annual Earnings from Expropriated Land (RSD)



Source: Survey, RAP, 2025.

Most PAPs (72%) indicated that land expropriation would not affect their agricultural production, which aligns with earlier findings that most of the acquired land was not used for agricultural purposes. However, 18% of respondents reported that land acquisition would significantly impact their agricultural output, while 10% anticipated a minor impact.

Figure 18 – Anticipated Impact of Land Expropriation on Agricultural Production



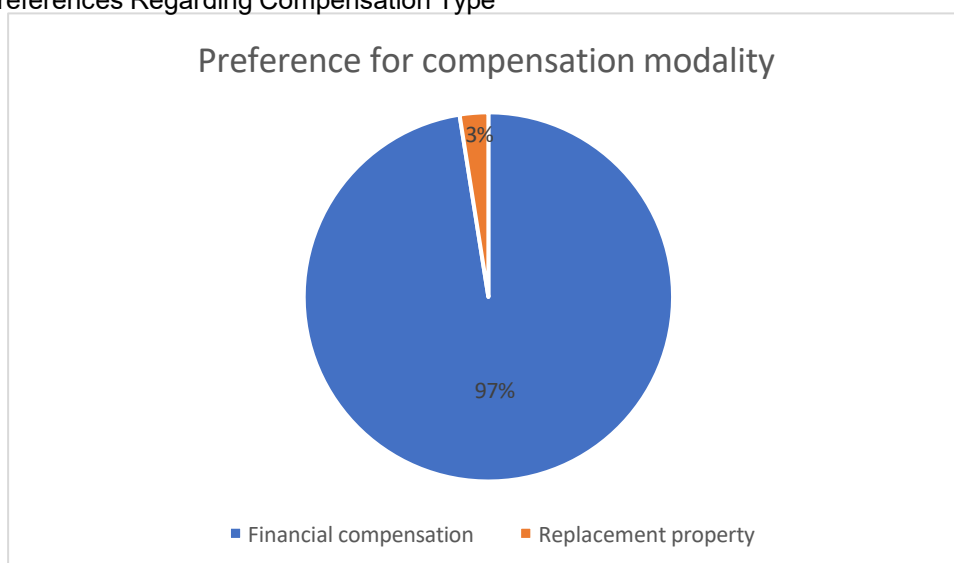
Source: Survey, RAP, 2025.

6.4. PAP Compensation Preferences and Plans

An overwhelming majority of PAPs (97%) expressed a clear preference for monetary compensation rather than the provision of a replacement property. This strong preference indicates that most PAPs do not depend on the expropriate land for their primary livelihood and consider cash compensation a more practical and flexible solution.

Only one respondent (3%) expressed a preference for receiving a replacement asset. This case involves a physically displaced household residing in a SRI's property, with an interest in relocating to another dwelling also owned by the SRI. In a separate case, another physically displaced household, also living in an SRI-owned structure, did not accept a replacement property, but instead expressed interest in receiving institutional support to obtain a housing loan for the construction of a new home on a privately owned plot.

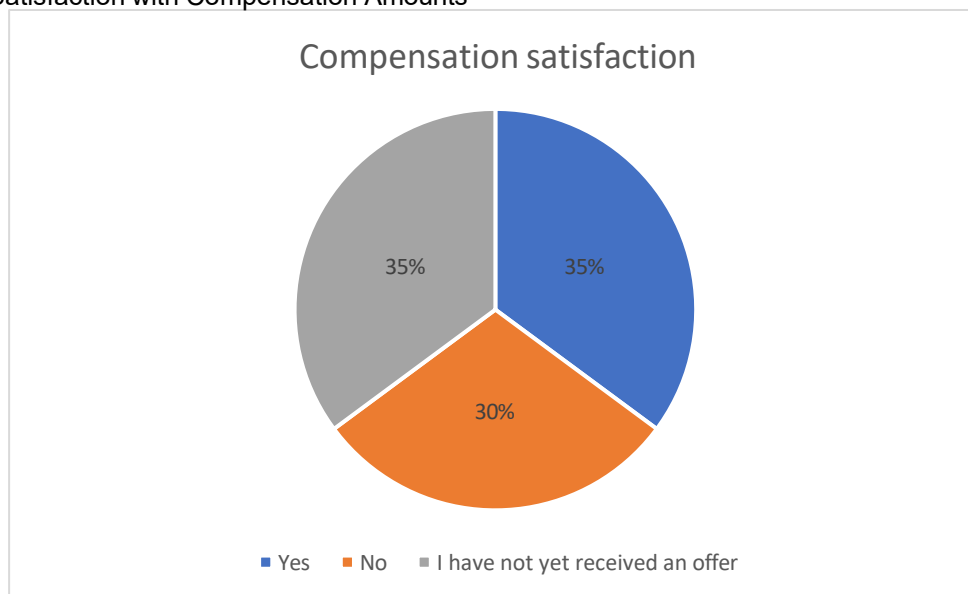
Figure 19 – PAP Preferences Regarding Compensation Type



Source: Survey, RAP, 2025.

When asked about their satisfaction with the amount of compensation offered for the expropriated land, 35% of PAPs reported being satisfied. In contrast, 30% expressed dissatisfaction with the amount offered, while the remaining 35% stated that they had not yet received a compensation offer at the time of the survey.

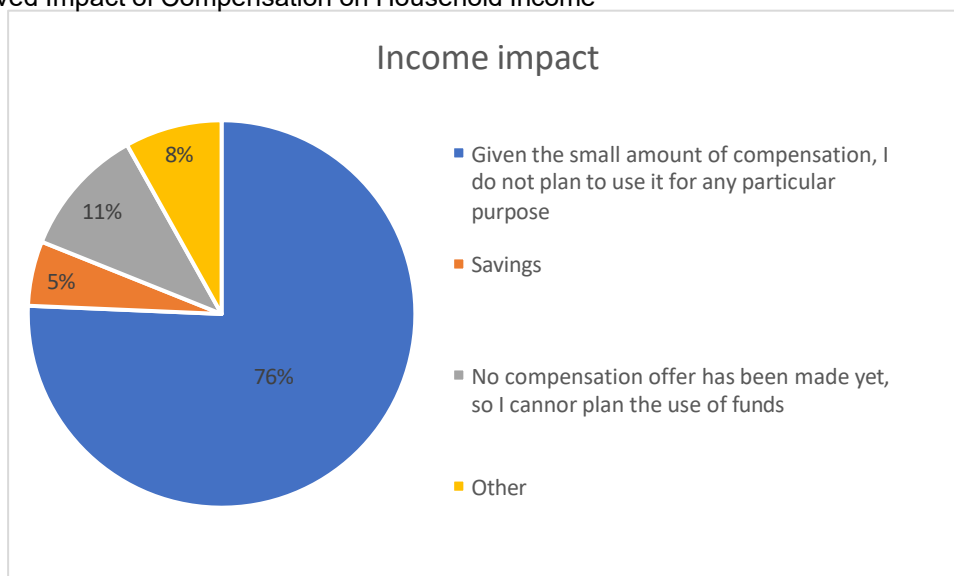
Figure 20 – PAP Satisfaction with Compensation Amounts



Source: Survey, RAP, 2025.

The majority of respondents (89%) stated that the compensation received for land expropriation would have no impact on their overall household income. Only 8% of PAPs anticipated a significant impact, while 3% noted that the extent of the impact would depend on the final compensation amount.

Figure 21 – Perceived Impact of Compensation on Household Income

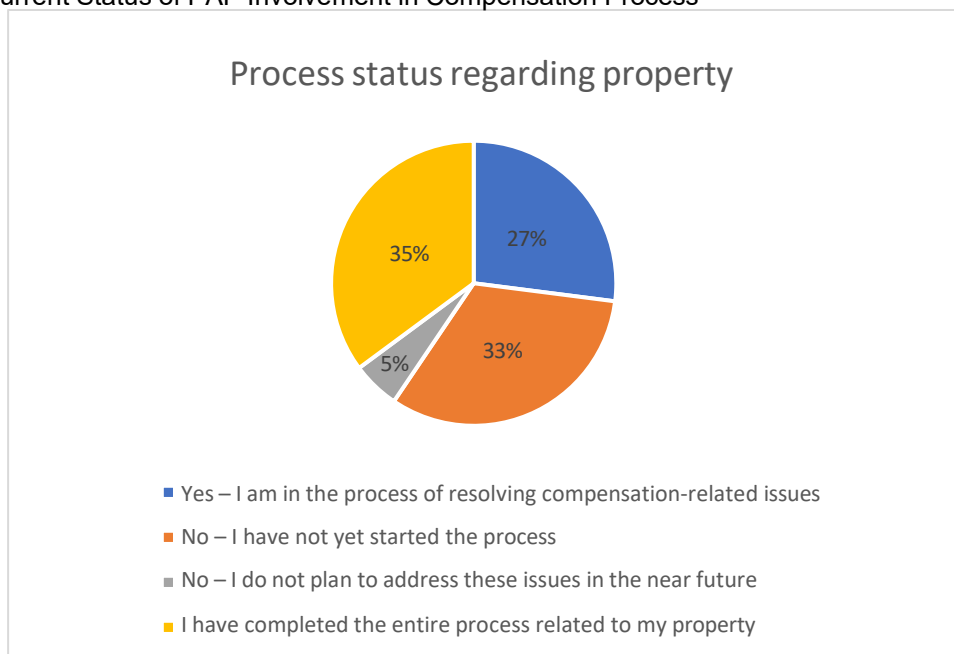


Source: Survey, RAP, 2025.

The Survey results indicate that 35% of PAPs have already completed all procedures related to expropriation of their affected property.

An additional 27% are currently engaged in resolving compensation-related matters. Meanwhile, 33% have not yet participated in the process, and 5% stated that they do not intend to address these issues in the near future.

Figure 22 – Current Status of PAP Involvement in Compensation Process

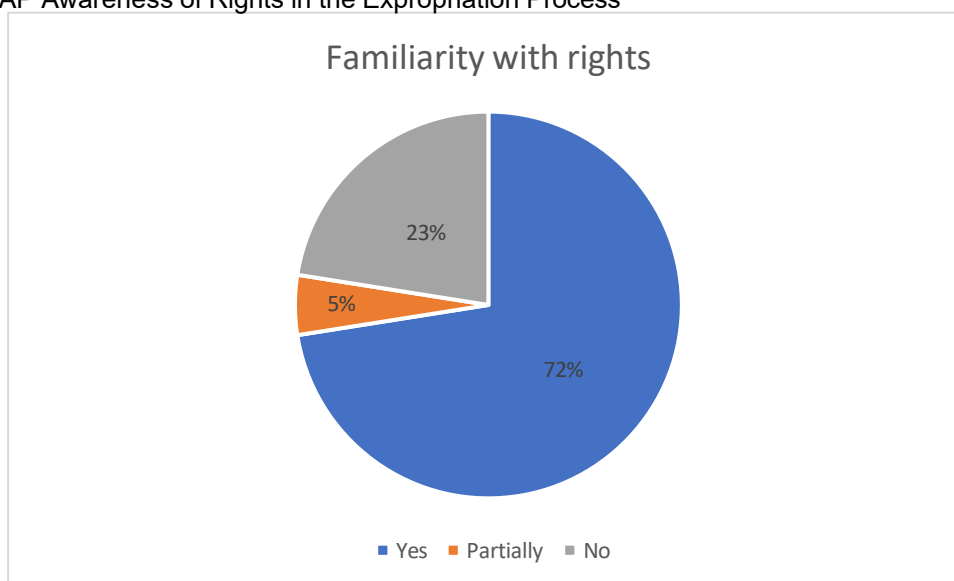


Source: Survey, RAP, 2025.

6.5. Awareness of Rights and Project Perceptions

The Survey results indicate that 72% of PAPs are familiar with their rights in the expropriation process, while 5% reported being only partially informed. Nearly one-quarter of respondents (23%) stated that they are not familiar with their rights at all.

Figure 23 – PAP Awareness of Rights in the Expropriation Process

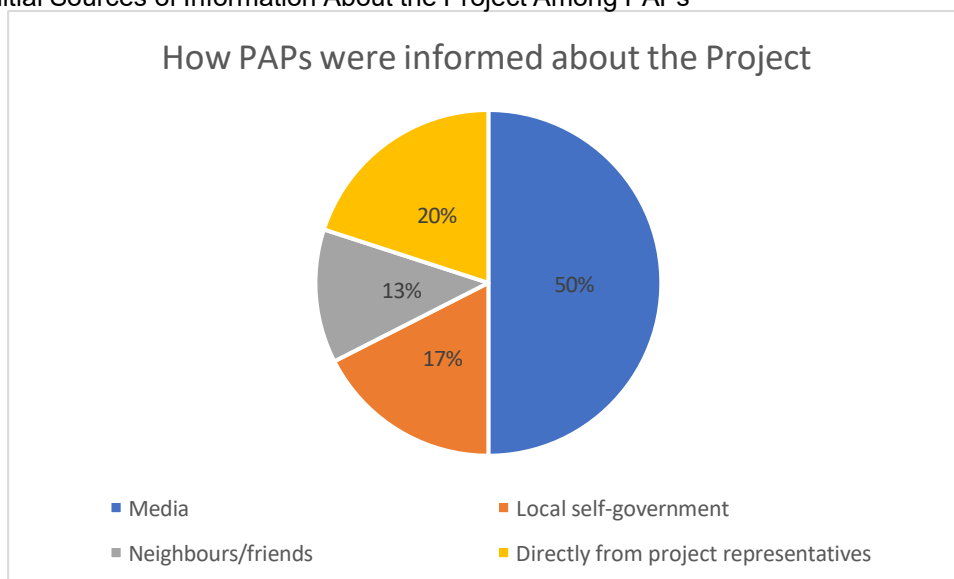


Source: Survey, RAP, 2025.

When asked whether they know whom to contact in order to protect and exercise their rights in the expropriation process, 62% of PAPs responded affirmatively. However, 28% stated they do not know whom to contact, while an additional 10% indicated they plan to obtain more information.

Half of the surveyed PAPs (50%) reported that they first learned about the railway Project through media sources, making it the most common channel of information. A smaller proportion (20%) received information directly from Project representatives, followed by 17% who were informed by local self-government authorities, and 13% who heard about the Project from neighbors or friends.

Figure 24 – Initial Sources of Information About the Project Among PAPs



Source: Survey, RAP, 2025.

A large majority of respondents (85%) expressed a positive opinion about the Project and the railway modernization, reflecting general support for infrastructure improvements in the area. A smaller proportion of respondents held neutral (10%) or negative (5%) views. These views were mostly associated with concerns that the construction process might take a long time and that the works may not be completed in the near future.

Several respondents raised additional concerns during the interviews. These primarily related to potential limitations in accessing the remaining parts of their land after partial expropriation, possible damage to crops or trees during construction, and dissatisfaction with the amount of compensation offered.

6.6. Vulnerability Assessment of Displaced Households

A household is defined as a group of people residing together in the same dwelling, sharing living arrangements (including meals), and jointly managing their economic resources. The Survey identified three households residing in structures subject to demolition and therefore physically displaced by the Project.

In addition to socioeconomic and health indicators of PAPs impacted by resettlement from their homes, the Survey collected detailed data on the type, size, and physical characteristics of the affected dwellings. This information included total floor area, primary construction materials, number of rooms, availability of basic utilities (water supply, electricity, sanitation), and type of heating. Such data is essential for assessing the adequacy of current housing conditions, identifying resettlement needs, and determining appropriate replacement housing standards or compensation amounts.



All vulnerable households were interviewed in person, with all adult members participating. The collected data enabled an assessment of their living conditions, economic status, health needs, housing security, and characteristics of the affected dwellings.

Based on the vulnerability criteria outlined in the methodology presented in sub-chapter 6.1, some households are considered vulnerable and require tailored support with further details provided in Annex 5 of this document.

In accordance with EIB ESS requirements, SRI should provide the following tailored assistance to the vulnerable households affected by physical displacement:

- Clear and timely communication regarding the demolition of residential structures - notification should be provided at least six months in advance;
- Transparent information on resettlement options, including both in-kind and cash-based alternatives;
- Provision of replacement housing that meets relevant standards in terms of adequacy, habitability, accessibility, affordability, cultural appropriateness, location, tenure security, and access to essential services and infrastructure;
- Logistical support during relocation, including assistance with the transport of personal belongings;
- Free legal aid (if requested) and administrative support to facilitate documentation and legal procedures related to resettlement.

Further consultations with these families will be necessary to finalize each household's resettlement preferences and to ensure that the proposed solutions are technically feasible, but also socially acceptable and sustainable.

In line with the Entitlements Matrix and EIB ESS 6, SRI will provide additional, tailored assistance to any vulnerable individual and household identified in the future. The aim is to ensure that resettlement and compensation processes do not disproportionately affect them, and that their livelihoods and well-being are at least restored, if not improved.

Support measures may include, depending on individual needs: assistance with relocation logistics, help in obtaining personal identification or social protection documents, priority access to available social services (e.g., health care, welfare support), referral to local employment or agricultural support programs, or connections to municipal support providers.

6.7. Business Entities Affected by Expropriation

The purpose of this assessment is to understand the potential impacts of Project-related displacement on the registered business entities whose property is affected by the Project.

As part of this process, one business entity was interviewed to evaluate whether the partial land acquisition would influence its operations, assets, or income streams. The interview was conducted with the bankruptcy administrator of a construction company currently undergoing liquidation. The expropriation concerns a small land area (21m²), and no negative impacts on business operations were identified. It was stated that any compensation received would be used to address outstanding creditor obligations.

One of the interviewed landowners is a natural person who is registered on the same land plot in the CM Pirot Grad (114m²) as a co-owner both personally and through an entrepreneurial business. Given that the plot is jointly owned by three individuals and five legal entities, it was significant to hear from this respondent that the land is not used for income generation – there are no business-related structures on it, it is not used for agricultural production, nor is it leased.

6.8. Summary of Key Socio-Economic Findings

Considering the presented results of the Survey, the following data and conclusions emerge as key for this RAP:



- The average area of land subject to expropriation per owner is approximately 42.7 m². This relatively small area of land loss per individual owner suggests that the anticipated impacts in terms of physical displacement and/or loss of income sources are limited and, in some cases, negligible.
- Partial acquisition was the dominant form of land impact under the Project, with only three private parcels being subject to entire expropriation (including the one approved during the expropriation process).
- The only three households were subject to physical displacement. These households demonstrate characteristics of vulnerability requiring tailored resettlement support.
- PAPs are elderly or middle-aged and are not economically dependent on the land. Pensions and salaries are the primary sources of income.
- Most of the affected plots (82%) are not used for income-generating purposes. This supports the conclusion that the economic impact of land acquisition is limited.
- 10% of respondents reported the presence of agricultural crops on their land, while 5% indicated the existence of auxiliary structures. An additional 5% reported that both crops and auxiliary structures were present on the affected land. These percentages demand full implementation of Entitlement Matrix in every situation where the land planned for expropriation is used for income generation.
- There is a strong preference for cash compensation (97%) over the provision of substitute property. However, most respondents (89%) stated that compensation for land expropriation would have no impact on their overall household income or wellbeing.
- Although most respondents reported being informed about their expropriation rights, a significant number (approximately one-third) lacked full clarity or awareness of whom to contact for assistance.
- Attitudes toward the Project are largely positive (85%), though some respondents expressed concerns related to limited access to remaining land, potential damage to crops, the amount of compensation, and the overall duration of construction works.

7. EXPROPRIATION PROCEDURE AND INSTITUTIONAL ARRANGEMENTS (roles and responsibilities)

Land needed for state infrastructural projects in the Republic of Serbia is typically acquired through application of the national Law on Expropriation¹⁰. This Law enables institutions to acquire private immovable property for projects that are deemed to be of public (national and/or local) interest, while protecting the interests of all project-affected persons with legal title (ownership), whose assets are to be expropriated.

The Law enshrines the principle of fair compensation, while the expropriation process usually goes by the following path:

- 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 this case SRI) to the property administration in the relevant city or municipality, together with a set of accompanying documents, including proof that funds needed for compensation are available.
- The owners of the affected properties within the expropriation area are served with the expropriation proposal (including all supporting documentation) by the competent city/municipal property administration, to which they must respond in writing within five days from the date of receipt. If needed, the property administration may schedule an oral hearing where owners or users of affected properties can express their views on the proposed expropriation. The administration will specifically invite the owners to declare whether there are any structures not registered in the Cadastre (auxiliary or adjoining buildings) or perennial plants on the parcel subject to expropriation, so that these can be included in the expropriation decision and duly considered in the compensation valuation process.
- If the documentation is complete, a decision on expropriation is issued by the property administration department. Property owners may appeal to the Ministry of Finance. Once the appeal period expires or the Ministry rejects the appeal, the decision becomes final. After finalization, the affected owner may initiate an administrative dispute before the Administrative Court seeking annulment of the expropriation decision.
- When the decision on expropriation becomes legally binding, another hearing must be held by the city/municipal property administration to discuss and determine the amount of compensation for each affected owner. The property owner with legal title will be offered fair monetary compensation at market price determined by the local Tax Administration or by certified appraisers. If no agreement on the amount of compensation is reached within two months from the date the expropriation decision becomes final, the property administration shall forward the case to the competent court, which will determine the compensation amount in non-contentious proceedings. Unlike the assessment of the land plot value itself which is provided by the local Tax Administration, the value of the auxiliary buildings, land improvements, trees etc. is estimated for each individual case by a certified appraiser hired by the Beneficiary of Expropriation. In court, the owner can submit his/her appraiser's assessment.
- After signing a compensation agreement or when the court decision on compensation becomes legally binding, the Beneficiary of Expropriation proceeds with the payment of compensation or provision of replacement property. The Law does not specify the time frame for payment but states that the deadline will be determined in the compensation agreement, usually 30 days.

The Beneficiary of Expropriation acquires the right to take possession of the expropriated property when the decision on compensation becomes final, or on the day the compensation agreement for the expropriated property is concluded. This rule has exceptions in legally enumerated cases of urgency.

¹⁰ Law on Expropriation in Serbian, available at: https://www.paragraf.rs/propisi/zakon_o_eksproprijaciji.html.



The above legal procedure will be applied to the expropriation of immovable property required for the Project in the Section area, together with the following higher standards prescribed by the EIB ESS:

- **Eligibility for Compensation:** Serbian Expropriation law compensates only formal landowners, while EIB ESS includes both formal and informal immovable property users.
- **Compensation Principles:** Expropriation law provides market-value compensation, whereas EIB ESS requires full replacement cost, including resettlement costs and transaction fees.
- **Timing of Compensation Payments:** Serbian law allows payment delays, but EIB ESS requires full compensation before land acquisition or resettlement. If, in exceptional circumstances, there are reasons to enter into possession of the property before the payment of compensation, such as long- standing court proceedings, the appropriate amount of compensation will be secured in advance and ready for payment.
- **Consultation and Grievance Mechanisms:** Expropriation law offers limited public participation of the affected citizens and local communities, while EIB ESS requires extensive stakeholder engagement, public consultations and effective grievance mechanism in addition to administrative and court proceedings.

Organizational roles and responsibilities related to the resettlement process are outlined in Table 5 below. As indicated, SRI is primarily responsible for the implementation of the activities defined in this RAP, with support from various national and local institutions and agencies.

Table 5 – Institutional Arrangements for RAP Implementation

RESPONSIBLE ORGANIZATION	MAIN RESPONSIBILITIES
SRI	1. Develops and discloses RAP draft 2. Organizes public consultations about the RAP, adopts and discloses final version of the document 3. Applies and coordinates resettlement activities prescribed by this RAP 4. Secures compensation funds and provide assistance measures 5. Establishes and administrates the Grievance Mechanism (GM) 6. Monitors and reports the RAP implementation 7. Covers all costs related to expropriation, resettlement and related activities (on behalf of the Republic of Serbia)
MINISTRY OF FINANCE	1. Acts as a second-instance body in the expropriation process overseeing all legal and financial aspects 2. In cooperation with the Promoter, actively participates in the implementation of the compensation payment procedure
CONTRACTOR	1. Ensures disclosure of GM information and supports its implementation at the local level 2. Conducts temporary land acquisition in accordance with EIB ESS
LOCAL TAX ADMINISTRATION	1. Assesses immovable property trade value (land plots)
LOCAL CADASTRAL OFFICE	1. Provides official information about affected real estate status 2. Executes legal title changes of immovable property owners
MUNICIPALITIES PIROT AND DIMITROVGRAD	1. Discloses RAP draft and final version on its websites 2. Conducts the expropriation process including determination of monetary compensation for the expropriated property based on the assessment of the Tax administration (for the land) and the appraiser (houses, crops/plants) 3. Municipal Health and Centres for Social Welfare aid vulnerable PAPs 4. Grievance mechanism and stakeholder engagement support
BASIC COURTS	1. Determines fair compensation for expropriated property if an agreement on compensation cannot be reached.



8. STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

8.1. Stakeholder Engagement During RAP Draft Development

The specific stakeholder engagement activities that have been undertaken so far primarily include:

- Meetings and written communication exchange between SRI, engaged experts, Contractor and public local and governmental bodies to discuss the Project design and expropriation procedure needs;
- Various e-mail correspondence, telephone communication, face-to-face meeting with the representatives of the Municipalities and local communities;
- Survey and interviews with PAPs affected by resettlement;
- Consultations and reporting to EIB;
- Media reporting.

The most important engagement activities undertaken to date and their influence on the RAP development and implementation are the following:

- **Meeting held among the SRI, Contractor, engaged social expert and officers of the Municipalities' property departments** - This meeting was held on 4th March 2025 in the City of Pirot premises to coordinate cooperation and address open issues related to the preparation of the RAP and the implementation of the expropriation process. After the meeting, the participants continued regular information exchange and cooperation in collecting and sharing data related to the expropriation procedures and the preparation of the draft of this document.
- **The Survey** was carried out in the period from 14 to 30 April 2025 on the territory of the Municipalities with the aim of reviewing the ongoing and planned expropriation activities, collecting information about the affected property and its owners, assessing the potential social impact of displacement, vulnerability of PAPs and needed mitigation measures. Detailed information about this activity is provided in Chapter 6 of this document.

8.2. Upcoming Stakeholder Engagement Activities

SRI and the engaged experts will be responsible for carrying out the following stakeholder engagement activities:

Document Disclosure: The draft of RAP will be disclosed electronically (in English and Serbian) and it will remain open for comments of interested parties 30 days at the websites of SRI <https://infrazs.rs/> and Municipalities. The disclosure package will include:

- Brief description of the Project;
- The respective draft of the document and annexes (with personal data being protected);
- Description of public consultation arrangements;
- Ways of submitting comments and feedback;
- Key deadlines.

Printed RAP (in Serbian language) will be made available in SRI and in both municipality premises 15 days before public consultation meetings.

Once adopted, RAP will be posted on the SRI website and websites of both municipalities until the official end of the Project.

Consultations: The consultation meeting about the draft RAP will be held in the premises of the City of Pirot. Consultation meeting will be announced, with all relevant documentation, at least 15 days in advance on the websites of the SRI and Municipalities. The meeting will be open to all interested individuals and organizations. If necessary, assistance will be provided to enable vulnerable people to attend meeting.

The Project stakeholder engagement activities will be gender appropriate and specially designed to enable adequate communication with the vulnerable ones. Each engagement activity will clearly specify how feedback and suggestions can be provided by interested parties.



Further stakeholder engagement activities will be conducted in accordance with EIB ESS, whenever needed or requested by interested parties, especially people affected by resettlement activities.

8.3. Grievance Mechanism

In accordance with the Grievance Management Plan developed for the Project, the Grievance Mechanism (GM) was established prior to the commencement of construction works and has been operational since December 2023. Both SRI and the Contractor are obliged to receive, record, and, when possible, resolve all grievances related to land acquisition and other Project socially relevant impacts in a timely and transparent manner.

SRI cooperates with local governments to ensure the GM is functional, accessible, and trusted by stakeholders. This includes regular dissemination of information about the GM's purpose, scope, procedures for submitting grievances, available channels, and designated contact persons.

GM Submission: Grievance forms are available in printed form at key physical locations throughout the Section and may be submitted anonymously. Grievances may be submitted through various channels, including grievance boxes, telephone, regular mail, e-mail, or direct contact with representatives of the Contractor. The Project Grievance Form is provided as Annex 6.

The main access points for obtaining and submitting grievances are:

- Contractor's camp;
- Railway stations in Pirot and Sukovo;
- Local community offices within the affected Section;
- Notice boards in the Municipalities.

Notices about the availability of grievance forms, submission procedures, and contact person have been visibly posted at the above-listed locations.

PAPs are also entitled to submit comments, complaints, and/or requests for information in person or via post, telephone, or e-mail using the following contact information:

- **SRI's Grievance Management Contact**
Name: Marija Stevanović Veljković
Title: Land Acquisition Officer
Company: Public Enterprise "Serbian Railways Infrastructure"
Email: marija.stevanovic-veljkovic@srbrail.rs
Address: Nemanjina 6, 11000 Belgrade
- **Contractor's Grievance Management Contact**
Name: Marko Risimović
Title: HSSE Manager
Company: TRACE
Email: marko.risimovic@trace.bg
Phone: +381 60 60 09 249

Decision-Making Procedure within the GM: All received grievances are registered in the Grievance Log. Logging a grievance with the GM does not preclude or prevent the grievant from seeking resolution through official authorities, including courts, inspections, or the Ombudsman, in accordance with the Serbian legal framework.

Upon registration, the Land Acquisition Officer conducts a rapid assessment to verify the received grievance and determine its severity. Within 7 days, each grievance is assigned to the appropriate expert or department. The complainant is then notified that the grievance has been registered, along with basic information on planned actions and the responsible contact person.



The Land Acquisition Officer investigates the grievance, taking into account the complainant's perspective and the remedy sought. A formal response is issued within 30 days of receipt, following the investigation. In emergency cases, the process is expedited accordingly.

The grievance is considered resolved only once the proposed resolution has been implemented and verified. The final decision includes an assessment of the grievance, a clear conclusion, recommended corrective measures, and, where applicable, proposals for compensation or steps to prevent recurrence. This decision is issued in writing and delivered to the complainant and any other party to whom the measures apply or who is legally obligated to act.

If the grievance solution is accepted by the complainant (or deemed urgent by the Land Acquisition Officer), and if a resolution is feasible, corrective action is undertaken promptly and effectively.

Grievances may also be submitted anonymously. In such cases, the Land Acquisition Officer investigates and issues a final written decision, which is then publicly disclosed on the bulletin board at the place where the grievance was originally submitted.

The SRI PIU maintains the Grievance Log, which documents all grievances received through available channels and includes disaggregated data by gender and grievance type. Personal data received through GM are protected in accordance with the Law on Personal Data Protection. The content and structure of the Grievance Log are presented in Annex 7.

Until the draft RAP was prepared, no grievances related to resettlement were submitted through the GM; however, two grievances were received during the public consultation.



9. TIMETABLE AND BUDGET

9.1. RAP Timetable

The implementation of the adopted RAP is the responsibility of the SRI. The dates of planned activities listed in the table below are indicative:

Table 6 – RAP Implementation Timetable

ACTION	TIMEFRAME	TASKS
RAP DRAFT DISCLOSURE	August 2025	The draft of this RAP will be disclosed in English and Serbian at least 30 days before the planned public consultations through the SRI and affected municipalities websites.
GRIEVANCE MECHANISM OPERATION	/	SRI GM has been operational since December 2023. It was established to enable timely, accessible, and transparent resolution of grievances submitted by PAPs and other stakeholders.
RAP PUBLIC CONSULTATIONS	September 2025	The public consultations will be organized by SRI in the Municipalities and will be conducted according to EIB ESS Standard 2 to receive PAPs and other stakeholders' feedback on this document
FINAL RAP ADOPTION AND PUBLICATION	September /October 2025	The outcome of the public consultation and received stakeholders' feedback will be documented and included in the final RAP, which will then be sent to EIB for their comments. Upon receiving "no objections", the final RAP will be adopted by the SRI and published on the SRI and websites of Municipalities until the official end of the Project.
EXPROPRIATION OF PRIVATE LAND AND PAYMENT OF COMPENSATION	Ongoing	The expropriation procedures will be continued by the respective property departments in Municipality, in accordance with the Law on Expropriation of the Republic of Serbia and the requirements of the EIB ESS. Displacement of owners and users from their private property will not occur prior to the payment of compensation, except in extraordinary circumstances as provided for under the Law on Expropriation.
CONSTRUCTION WORKS	Ongoing	The construction works on public owned land are ongoing. The earliest construction activities on private land area affected by the expropriation will start after the compensation are paid and, if applicable, assistance measures are provided.

9.2. RAP Implementation Budget

The costs related to the development and implementation of the RAP, including compensation for affected land and property, will be borne by SRI from the approved budget funds. Every year, SRI will request the necessary funds from the Ministry of Finance in accordance with the progress of activities prescribed by this RAP and other Project's documentation.

The RAP implementation budget will cover the costs mentioned in the table below.

Table 7 – Expropriation and RAP Implementation Budget

TYPE OF COSTS	ACTIVITIES
LEGAL AND ADMINISTRATIVE COSTS	- Land acquisition and expropriation process fees (including appraiser costs) - Compensation negotiation and dispute resolution expenses - Court fees and attorney costs - Notary, administrative and documentation fees - Costs for land title transfer and registration
STAKEHOLDER ENGAGEMENT AND COMMUNICATION	- Public consultations and community meetings - Preparation and distribution of information materials - Grievance redress mechanism operation costs



COMPENSATION AND ASSISTANCE MEASURES COSTS	• Payments for land acquisition, asset and improvements loss (permanent and temporary) • Compensation annually / perennial crops and trees • Financial and logistical support for relocation • Any additional costs related to compensation and/or assistance measures, as defined in the Entitlement Matrix
RAP IMPLEMENTATION AND MONITORING COSTS	• RAP implementation staff salaries and operational expenses • Periodic monitoring and compliance reporting • External experts monitoring activities
CONTINGENCY AND MISCELLANEOUS COSTS	• Unforeseen legal or administrative expenses • Additional compensation due to delays or legal disputes • Emergency support for vulnerable PAPs

Due to ongoing procedures for assessing the value of affected land and assets, as well as determining related compensation and assistance measures, it is currently not possible to estimate the total cost of the entire expropriation process in the Section and, consequently, the implementation of this RAP.

SRI will maintain financial records of the aforementioned costs and, when required or agreed, provide financial reports to the EIB.



10. MONITORING AND REPORTING

The effective implementation of this RAP requires continuous monitoring, reporting and corrective actions. Despite the lack of legal monitoring requirements in the Serbian Expropriation Law, these measures are introduced to align with international standards and project financing requirements, ensuring comprehensive oversight and accountability. Accordingly, the SRI maintains the already established system of resources, staff, and procedures to ensure continued monitoring and regular reporting on the implementation of this document.

10.1. Monitoring Arrangements

The monitoring system will operate at multiple levels:

- **SRI Resettlement Process Database:** The SRI PIU and Legal Department will develop and maintain an internal database to monitor the resettlement and expropriation process, ensuring it is regularly updated with comprehensive information on affected persons and properties. This database will document all expropriation cases through various stages of the process, including property and PAPs data, information on decisions on expropriation, compensation amount, signed compensation agreements, provision of assistance, changes of ownerships and any complaints or legal proceedings initiated. Given that this database contains personal data, its contents will remain confidential and inaccessible to the public. It will serve as a basic internal tool for monitoring and reporting the RAP implementation. Annex 2 of this document shall serve as a template for this table.
- **Contractor's Reporting Activities:** The Contractor's HSSE Manager, who supports the implementation of the Grievance Mechanism with respect to construction-related issues, will also assist in the implementation of expropriation and resettlement-related tasks, in close coordination with the SRI and the Social Expert within the Engineer's team. In this support role, the HSSE Manager will facilitate communication with subcontractors and local authorities, ensure that procedures related to temporary land occupation are properly followed (including prior notification, formal contracting, and adequate compensation), and maintain accurate site-level records concerning land access and any support provided to vulnerable individuals. All activities will be carried out under the oversight of the Engineer, and regular monthly updates on relevant RAP implementation tasks will be submitted to the Engineer for consolidation.
- **External monitoring:** The engaged Social Expert within the Engineer's team will ensure transparency, fairness, and efficiency of the displacement process.

In this role, the Social Expert will be responsible for the following tasks:

- Conducting assessments of the RAP implementation and its compliance with EIB ESS and best local practice;
- Identifying systemic challenges in the resettlement process and promptly proposing corrective actions;
- Evaluating the effectiveness of mitigation measures, particularly those targeting physically displaced persons;
- Verifying that affected persons, especially vulnerable groups, receive adequate support and tailored assistance;
- Reviewing the accessibility and effectiveness of grievance mechanisms and ensuring timely resolution of complaints;
- Conducting field monitoring in case of serious accidents, incidents or dissatisfaction of the affected communities or groups;
- Preparing monthly monitoring reports for SRI.

To assess the RAP implementation, SRI and the Social Expert within the Engineer's team will follow the monitoring methodology and key performance indicators (KPIs) prescribed by the Chapter 10 of the RPF, such as: the number of signed compensation agreements before land take, resolution rate of grievances within 30 days, delivery of tailored support to identified vulnerable households etc. Potential changes of the KPIs will be made according to the process development in the field or by EIB request.



10.2. Progress Reporting

Monthly and semi-annual reports: The Social Expert within the Engineer's team, with support from the Contractor, will prepare monthly RAP implementation reports for SRI, according to the prescribed KPIs and all available information.

Findings from these reports will be summarized in semi-annual reports, which will be submitted to EIB by SRI. If requested, meeting minutes and photographs will be attached to these reports. All information regarding individuals/households, their affected assets, and compensation payments will be treated in these reports as confidential.

A Final Land Acquisition and Resettlement Execution Report will be prepared by SRI and submitted to EIB six months after the completion of all land acquisition activities and the successful mitigation of all impacts. This report will include:

- A summary of Project land acquisition impacts;
- Efforts undertaken to avoid and minimize displacement impacts;
- A summary of stakeholder engagement activities and feedback received;
- Displacement statistic;
- A description of provided compensation and assistance measures;
- A record of major challenges encountered, and the solutions implemented;
- A summary of grievance mechanism outcomes;
- An overview of resources mobilized for planning and implementing land acquisition, resettlement, and livelihood restoration activities.

If necessary, EIB may require periodic external compliance reviews or an external completion audit of the RAP implementation.



11. SUMMARY OF FINDINGS AND IMPLEMENTATION COMMITMENTS

Based on the preceding analysis, this section outlines the main findings and SRI's commitments concerning the expected displacement impacts associated with the Project:

- The most significant socio-economic risk in the Section area concerns the displacement of three vulnerable households from their homes. Their resettlement should be implemented in accordance with the measures outlined in subchapters 4.7 and 6.6 of this document, with special attention to their specific needs and vulnerabilities.
- Although the expropriation typically involves smaller portions of land, the process must ensure that landowners retain access to and continued use of the remaining and surrounding land.
- Compensation payments and the provision of support measures will be conducted in accordance with the provisions set out in Table 4 – Entitlements Matrix, with particular focus on affected persons who derive income from the expropriated land, ensuring their economic stability during and after their displacement.
- Temporary land acquisition for construction purposes will be carried out following the measures from subchapter 4.4, ensuring minimal disruption and timely restitution of private land after construction activities.
- Ongoing expropriation procedures will be carried out in full compliance with the Serbian Law on Expropriation and the procedures defined in the RPF, including specific requirements of the EIB ESS, as detailed in Chapter 7 of this document.
- SRI will ensure the proper functioning of the GM, guaranteeing accessible, transparent, and timely handling of complaints. SRI will proactively engage with PAPs and their legal representatives to propose mediation aimed at avoiding court proceedings wherever possible, facilitating their swift and cost-effective resolution.
- Continuous consultation with PAPs and relevant stakeholders, especially Municipalities, will be maintained throughout the resettlement process to ensure that mitigation measures remain appropriate, socially acceptable, and sustainable.
- SRI commits to allocating sufficient resources for the effective monitoring of RAP implementation and will provide regular, transparent reporting to the EIB regarding progress, challenges, and any corrective actions taken.

Annex 1 – Land Plot Ownership, Quantity, Area, and Type in the Section Under the Expropriation Study

Cadastral Municipality	Number and area (ha) of land plots required for the implementation of the Project		Number and area (ha) of all land plots planned for entirely expropriation or administrative transfer		Number and area (ha) of all land plots planned for partial expropriation or administrative transfer		PUBLIC PROPERTY				PRIVATE PROPERTY														
							Number and area (ha) of all public land plots planned for entirely expropriation or administrative transfer		Number and area (ha) of all public land plots planned for partial expropriation or administrative transfer		Number and area (m ²) of all private plots planned for entirely/partial expropriation (E-entire, P-partial)			Number and area (m ²) of all land plots owned by natural persons planned for entirely/partial expropriation			Number and area (m ²) of all plots owned by private business entities planned for entirely/partial expropriation			Number of private plots and its areas (m ²) by land type: 1. Agricultural land 2.Forest land 3.Construction land 4.Other land					
1. Staničenje Piroć	2	1,9582	1	1,9425	1	0,0157	1	1,9425	1	0,0157	0	E.	0	0	0	E.	0	0	0	E.	0	0	1.	0	0
												0	0	0		0	0		0	0		2.	0	0	
												P.	0	0		P.	0	0		P.	0	0	3.	0	0
												0	0	0		0	0		0	0		4.	0	0	
2. Sopot Piroć	23	13,6639	12	13,5005	11	0,1634	12	13,5005	7	0,1195	4	E.	0	0	4	E.	0	0	0	E.	0	0	1.	4	439
												0	0	0		0	0		0	0		2.	0	0	
												P.	439	439		P.	439		P.	0		3.	0	0	
												4	439	439		4	439		0	0		4.	0	0	
3. Piroć City* Piroć	66	21,6373	42	21,2387	24	0,3986	41	21,2088	14	0,3756	11	E.	1	299	9	E.	1	299	2	E.	0	0	1.	0	0
												1	299	299		1	299		0	0		2.	0	0	
												P.	10	230		P.	8	185		P.	45		3.	11	529
												10	230	230		8	185		2	45		4.	0	0	
4. Piroć-Van Varoš Piroć	56	11,1131	44	10,9782	12	0,1349	43	10,9752	8	0,1021	5	E.	1	27	5	E.	1	27	0	E.	0	0	1.	1	27
												1	27	27		1	27		0	0		2.	0	0	
												P.	4	328		P.	4	328		P.	0		3.	4	328
												4	328	328		4	328		0	0		4.	0	0	
5. Veliki Jovanovac Piroć	6	8,8532	5	8,8364	1	0,0168	5	8,8364	1	0,0168	0	E.	0	0	0	E.	0	0	0	E.	0	0	1.	0	0
												0	0	0		0	0		0	0		2.	0	0	
												P.	0	0		P.	0	0		P.	0		3.	0	0
												0	0	0		0	0		0	0		4.	0	0	
6. Veliko Selo Piroć	4	5,6496	1	5,6423	3	0,0073	1	5,6423	2	0,0041	1	E.	0	0	1	E.	0	0	0	E.	0	0	1.	1	32
												0	0	0		0	0		0	0		2.	0	0	
												P.	1	32		P.	1	32		P.	0		3.	0	0
												1	32	32		1	32		0	0		4.	0	0	
7. Vojnegovac Piroć	5	0,1509	1	0,0908	4	0,0601	1	0,0908	3	0,0539	1	E.	0	0	1	E.	0	0	0	E.	0	0	1.	1	62
												0	0	0		0	0		0	0		2.	0	0	
												P.	1	62		P.	1	62		P.	0		3.	0	0
												1	62	62		1	62		0	0		4.	0	0	
8. Mali Jovanovac Piroć	3	0,0208	1	0,0071	2	0,0137	1	0,0071	2	0,0137	0	E.	0	0	0	E.	0	0	0	E.	0	0	1.	0	0
												0	0	0		0	0		0	0		2.	0	0	
												P.	0	0		P.	0	0		P.	0		3.	0	0
												0	0	0		0	0		0	0		4.	0	0	
9. Poljska Ržana Piroć	10	6,6107	8	6,5888	2	0,0219	8	6,5888	2	0,0219	0	E.	0	0	0	E.	0	0	0	E.	0	0	1.	0	0
												0	0	0		0	0		0	0		2.	0	0	
												P.	0	0		P.	0	0		P.	0		3.	0	0

10. Trnjana Piroć	5	3,0108	3	2,9895	2	0,0213	3	2,9895	2	0,0213	0	0	0	0	0	0	0	0	0	0	4.	0	0																		
												E.			0		0		E.		0	1.	0	0																	
												0							0			0	2.	0	0																
												P.							0			0	3.	0	0																
11. Gradište Piroć	2	2,5452	1	2,4965	1	0,0487	1	2,4965	0	0	1	0	0	0	0	0	0	0		1.	0	0																			
																							0	0	0	0	2.	0	0												
																			E.				0			0	0	3.	1	487											
																			P.								487	487	0	0	4.	0	0								
12. Željuša Dimitrovgrad	4	0,5208	1	0,4945	3	0,0263	1	0,4945	3	0,0263	0	0	0	0	0	0	0	0	1.	0	0																				
																						0	0	0	0	2.			0	0											
																						P.			0	0	0	3.	0	0											
																						0					0	4.	0	0											
13. Lukavica Dimitrovgrad	4	3,6165	2	3,6140	2	0,0025	2	3,6140	1	0,0009	1	0	0	0	0	0	0	0	0	0	1.	0	0																		
																								0	0	0	0	2.	0	0											
																								P.			16	16	0	3.	1	16									
																								1					0	4.	0	0									
14. Obranovac Piroć	8	7,3052	7	7,2965	1	0,0087	7	7,2965	1	0,0087	0	0	0	0	0	0	0	0	0	0	1.	0	0																		
																								0	0	0	0	2.	0	0											
																								P.			0	0	0	3.	0	0									
																								0					0	4.	0	0									
15. Srećkovac Piroć	2	1,2207	1	1,1897	1	0,0310	1	1,1897	1	0,0310	0	0	0	0	0	0	0	0	0	0	1.	0	0																		
																								0	0	0	0	2.	0	0											
																								P.			0	0	0	3.	0	0									
																								0					0	4.	0	0									
16. Sukovo Piroć	30	8,9406	14	8,5923	16	0,3483	14	8,5923	5	0,2506	11	0	0	0	0	0	0	0	0	0	1.	11	977																		
																								1	425	552	0	0	977	0	0	2.	0	0							
																								P.			11			0	0	3.	0	0							
																								10							0	4.	0	0							
17. Činglavci Piroć	3	6,2489	2	6,2320	1	0,0169	2	6,2320	1	0,0169	0	0	0	0	0	0	0	0	0	0	1.	0	0																		
																								0	0	0	0	0	0	0	2.	0	0								
																								P.			0			0	0	3.	0	0							
																								0							0	4.	0	0							
18. Gojin Dol Dimitrovgrad	11	1,4019	2	1,3315	9	0,0704	2	1,3315	5	0,0677	4	0	0	0	0	0	0	0	0	0	1.	4	27																		
																								0	0	0	0	0	0	0	2.	0	0								
																								P.			27			27	0	3.	0	0							
																								4							0	4.	0	0							
Total	244	104.4 ha	148	103 ha	96	1,4 ha	146	103 ha	59	1,1 ha	39	0	0	0	0	0	0	0	0	0	0	1.	22	1558																	
																									3	751	2	751	2	0	0	2	0	0							
																									P.										2173	35	2128	45	3.	17	1366
																									36																
* In CM Piroć Grad, 4 instead of 11 private land plots will be expropriated, totaling 168m² instead of 529m² of land. Here is also one plot which is owned by both natural and legal persons, but is recorded as owned by natural persons because legal persons are primarily owned by them.													2924m²		2879m²		45 m²		39	2924m²																					

* In CM Pirot Grad, 4 instead of 11 private land plots will be expropriated, totaling 168m² instead of 529m² of land. Here is also one plot which is owned by both natural and legal persons, but is recorded as owned by natural persons because legal persons are primarily owned by them.



Annex 3 - Socio-Economic Survey Materials - Questionnaires

QUESTIONNAIRE FOR HOUSEHOLDS AFFECTED BY PHYSICAL DISPLACEMENT (SEMI-STRUCTURED INTERVIEW)

Dear Sir/Madam,

The purpose of this questionnaire is to collect data required for the preparation of the Resettlement Action Plan (RAP), as well as to assess the potential social impacts that the reconstruction and modernization of the Niš–Dimitrovgrad railway (Staničenje–Dimitrovgrad section) may have on local communities, particularly households whose property is subject to expropriation. All collected data will be protected in line with the Law on Personal Data Protection and used exclusively for the purposes of this Project. Participation in this survey is voluntary. You are not required to answer any question you do not wish to, and you may withdraw from the interview at any time.

A. RESPONDENT AND HOUSEHOLD IDENTIFICATION

1. Full name of the owner/tenant: _____
2. Gender: ☐ Male ☐ Female
3. Age group of the owner:
☐ 18–34 ☐ 35–64 ☐ 65+
4. Total number of household members:
☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ 5–6 ☐ 7+
5. Age and relationship of household members to the owner/tenant:
Member 1: ____ years old, relationship: _____
Member 2: ____ years old, relationship: _____
Member 3: ____ years old, relationship: _____
Member 4: ____ years old, relationship: _____
Member 5: ____ years old, relationship: _____
6. Name of the respondent (if different from the owner/tenant): _____
7. Relationship to the owner/tenant (if not the same): _____
8. Contact telephone number: _____

B. SOCIO-ECONOMIC DATA

1. Highest level of education of the respondent:
☐ Incomplete primary education
☐ Completed primary education
☐ Completed secondary education
☐ Higher education (college/university degree)
☐ Postgraduate degree (specialization/master's/doctorate)
2. Employment status:
☐ Employed
☐ Unemployed



- ☐ Student
☐ Retired
☐ Homemaker
3. What is your household's main source of income?
☐ Agriculture
☐ Salary
☐ Pension
☐ Social assistance
☐ Rental income
☐ Other: _____
4. What is your household's secondary source of income (if any)?
☐ Agriculture
☐ Salary
☐ Pension
☐ Social assistance
☐ Rental income
☐ Other: _____
5. Marital status of the respondent:
☐ Single ☐ Married ☐ Divorced ☐ Widowed
6. How long have you been living in this settlement?
☐ I don't live here, but I own property
☐ I have always lived here
☐ Less than 1 year
☐ 1–5 years
☐ 6–10 years
☐ Over 11 years
7. What is your household's average total monthly income from all sources (salary, pension, etc.)?
☐ Less than 30,000 RSD
☐ 30,001 – 50,000 RSD
☐ 50,001 – 80,000 RSD
☐ 80,001 – 120,000 RSD
☐ More than 120,000 RSD
☐ Prefer not to say
8. Does any household member have a disability, specific needs, or require permanent care and assistance (e.g. mobility, hearing/vision impairment, chronic illness)?
☐ Yes ☐ No
If yes, please provide details: _____
9. Does any household member use home care or other social services (e.g. home assistance, day care, personal assistant)?
☐ Yes ☐ No
If yes, please provide details: _____
10. Does any household member receive social assistance or other state support (e.g. financial aid, child allowance, caregiver support, one-time aid)?
☐ Yes ☐ No
If yes, please provide details: _____
11. Does any household member belong to a vulnerable group (e.g. female-headed household, person over 65 without support, person with a disability, single parent)?



☐ Yes ☐ No

If yes, please provide details: _____

C. INFORMATION ABOUT THE EXPROPRIATED PROPERTY

1. Cadastral municipality of the property:
☐ Sopot
☐ Pirot – Van Varoš
☐ Pirot grad
☐ Veliko selo
☐ Vojnegovac
☐ Sukovo
☐ Gradište
☐ Gojin Dol
☐ Lukavica
2. Plot number: _____
3. Was the entire plot expropriated or only a part?
☐ Entire plot ☐ Partial
4. Plot size (m²): _____
5. Land status (as registered): _____
☐ Construction land ☐ Agricultural land ☐ Other: _____
6. Is the plot rented out?
☐ Yes ☐ No
7. Ownership status:
☐ Sole owner ☐ Co-owner ☐ Tenant
If co-owner, number of co-owners: _____
8. Does the household have a loan related to the expropriated property?
☐ Yes ☐ No
If yes, specify loan type and monthly payment: _____
9. Does the affected land include any auxiliary structures?
☐ Yes ☐ No
If yes, specify the type and size: _____
10. Do you plan to request expropriation of the remaining part of the plot not currently subject to expropriation?
☐ No, the entire plot is already expropriated
☐ I'm not interested in expropriating the remaining part
☐ I was not aware this is an option
☐ I have already submitted a request for expropriation of the remaining part

D. STRUCTURE CHARACTERISTICS

1. Type of structure:
☐ Residential house/Apartment ☐ Holiday home ☐ Auxiliary structure ☐ Other: _____
2. Structure size (gross m²): _____
3. Year of construction (approximate): _____



4. Purpose of the structure:
 - ☐ Permanent residence
 - ☐ Vacation/recreational use
 - ☐ Agricultural or commercial use (specify): _____
 - ☐ Rental (residential/business)
5. Primary building material:
 - ☐ Brick ☐ Concrete ☐ Stone ☐ Wood ☐ Mixed ☐ Other: _____
6. Structure amenities (mark all that apply):
 - ☐ Number of rooms: _____
 - ☐ Connected to water supply
 - ☐ Has sewage/septic tank
 - ☐ Has electricity
 - ☐ Type of heating: _____
 - ☐ Other: _____
7. Is the structure legalized?
 - ☐ Yes ☐ No

E. PLANS AFTER EXPROPRIATION

1. What type of compensation would you prefer?
 - ☐ Financial compensation ☐ Replacement property ☐ Other: _____
2. If financial, how do you plan to use the compensation?
 - ☐ Buying housing
 - ☐ Building housing
 - ☐ Buying agricultural land
 - ☐ Starting/expanding agricultural production
 - ☐ Starting a business
 - ☐ Savings
 - ☐ Debt/loan repayment
 - ☐ Supporting family members
 - ☐ Undecided
 - ☐ Other: _____
3. Do you plan to buy a new property?
 - ☐ Yes ☐ No
 - If yes, in which cadastral municipality? _____
4. Do you plan to build a new property?
 - ☐ Yes ☐ No
 - If yes, in which cadastral municipality? _____
5. Do you already own a plot for construction?
 - ☐ Yes ☐ No
6. Do you need assistance with the relocation process (e.g. physical help, transport)?
 - ☐ Yes ☐ No
 - If yes, specify the type of support: _____



F. KNOWLEDGE OF EXPROPRIATION RIGHTS

1. Are you familiar with your rights in the expropriation process?
☐ Yes ☐ Partially ☐ No
2. Do you know whom to contact to protect and exercise your rights regarding expropriation?
☐ Yes, I know exactly whom to contact
☐ No, I don't know whom to contact
☐ I plan to obtain more information

G. AWARENESS AND OPINION ABOUT THE PROJECT

1. How did you learn about the railway reconstruction and modernization project?
☐ Media
☐ Local self-government
☐ Neighbours/friends
☐ Directly from project representatives
☐ Other: _____
2. What is your opinion about the project?
☐ Positive
☐ Negative
☐ Neutral

Comments:

Please use the space below to provide any additional comments, questions, or suggestions you may have regarding the Project, the expropriation process, or the works on the Staničenje–Dimitrovgrad section:



QUESTIONNAIRE FOR LANDOWNERS AFFECTED BY EXPROPRIATION

Dear Sir/Madam,

The purpose of this questionnaire is to collect data required for the development of the Resettlement Action Plan (RAP), as well as to assess the potential social impacts of the reconstruction and modernization of the Niš–Dimitrovgrad railway (Staničenje–Dimitrovgrad section) on local communities, particularly on individuals whose land is subject to expropriation. All collected data will be protected in accordance with the Law on Personal Data Protection and used exclusively for the purposes of this Project. Participation in this survey is voluntary. You are not required to answer any question you do not wish to, and you may withdraw from the interview at any time.

A. IDENTIFICATION DATA OF THE OWNER OR RESPONDENT

1. Full name of the owner: _____
2. Gender: ☐ Male ☐ Female
3. Age group of the owner:
☐ 18–34 ☐ 35–64 ☐ 65+
4. Full name of the respondent (if not the owner): _____
5. Relationship to the owner (if not the owner): _____
6. Contact phone: _____

B. SOCIO-ECONOMIC DATA

1. Highest level of education:
☐ Incomplete primary education
☐ Completed primary education
☐ Completed secondary education
☐ Higher education (college/university degree)
☐ Postgraduate degree (specialization/master's/doctorate)
2. Employment status:
☐ Employed
☐ Unemployed
☐ Student
☐ Retired
☐ Homemaker
3. How long have you been living in this settlement?
☐ I don't live here, but I own property
☐ I have always lived here
☐ Less than 1 year
☐ 1–5 years
☐ 6–10 years
☐ Over 11 years
4. Main source of household income:
☐ Agriculture
☐ Salary
☐ Pension
☐ Social assistance
☐ Rental income
☐ Other: _____



5. Secondary source of income (if any):

- ☐ Agriculture
☐ Salary
☐ Pension
☐ Social assistance
☐ Rental income
☐ Other: _____

C. STATUS AND USE OF EXPROPRIATED LAND

1. Cadastral municipality where the affected property is located:

- ☐ Sopot
☐ Pirot – Van Varoš
☐ Pirot grad
☐ Veliko selo
☐ Vojnegovac
☐ Sukovo
☐ Gradište
☐ Gojin Dol
☐ Lukavica

2. Plot number: _____

3. Has the entire plot been expropriated or only a part?

- ☐ Entire plot ☐ Partial

4. Surface area of the expropriated portion (in m²): _____

5. Land status (as registered):

- ☐ Construction land ☐ Agricultural land ☐ Other: _____

6. Is the plot (or part of it) rented out?

- ☐ Yes ☐ No

7. Your status in relation to the expropriated plot:

- ☐ Sole owner
☐ Co-owner
☐ Tenant

If co-owner, number of co-owners: _____

8. Is the land used for commercial purposes (e.g., agricultural production, rental)?

- ☐ Yes ☐ No

9. If used for agriculture/rental, estimated annual income from the expropriated land:

- ☐ None
☐ Less than 100,000 RSD
☐ 100,000 – 500,000 RSD
☐ 500,001 – 1,000,000 RSD
☐ More than 1,000,000 RSD

10. Do you plan to request expropriation of the remaining part of the plot not currently subject to expropriation?

- ☐ No, the entire plot is already expropriated
☐ I'm not interested in expropriating the remaining part
☐ I was not aware this is an option
☐ I have already submitted a request for expropriation of the remaining part



D. IMPACT OF EXPROPRIATION ON AGRICULTURE

1. Does the affected part of the plot include crops or auxiliary structures?
 - ☐ Yes - agricultural crops are present (e.g., fruit, grains, perennial plants)
 - ☐ Yes - auxiliary structures are present (e.g., storage facilities, sheds)
 - ☐ Yes - both agricultural crops and auxiliary structures are present
 - ☐ No - the affected part of the plot does not include any crops or structures
2. Will the expropriation impact your agricultural production?
 - ☐ Yes, significantly
 - ☐ Yes, to a minor extent
 - ☐ No, it will not have any impact

E. COMPENSATION AND ECONOMIC EFFECTS

1. What type of compensation would you prefer?
 - ☐ Financial compensation
 - ☐ Replacement property
 - ☐ Other: _____
2. Are you satisfied with the compensation amount offered for the expropriation?
 - ☐ Yes
 - ☐ No
 - ☐ I have not yet received an offer
3. Will the expropriation affect your overall income?
 - ☐ It will significantly affect my income
 - ☐ It will slightly affect my income
 - ☐ It will have no impact on my income

F. POST-EXPROPRIATION PLANS

1. If you receive financial compensation, how do you plan to use it?
 - ☐ Given the small amount of compensation, I do not plan to use it for any particular purpose
 - ☐ No compensation offer has been made yet, so I cannot plan the use of funds
 - ☐ Savings
 - ☐ Other: _____
2. Are you currently in the process of resolving property-related issues (compensation, relocation, etc.)?
 - ☐ Yes – I am in the process of resolving compensation-related issues
 - ☐ No – I have not yet started the process
 - ☐ No – I do not plan to address these issues in the near future
 - ☐ I have completed the entire process related to my property

G. KNOWLEDGE OF EXPROPRIATION RIGHTS

1. Are you familiar with your rights in the expropriation process?
 - ☐ Yes ☐ Partially ☐ No
2. Do you know whom to contact to protect and exercise your rights regarding expropriation?
 - ☐ Yes, I know exactly whom to contact
 - ☐ No, I don't know whom to contact
 - ☐ I plan to obtain more information



H. AWARENESS AND OPINION ABOUT THE PROJECT

3. How did you learn about the railway reconstruction and modernization project?
 - ☐ Media
 - ☐ Local self-government
 - ☐ Neighbours/friends
 - ☐ Directly from project representatives
 - ☐ Other: _____
4. What is your opinion about the project?
 - ☐ Positive
 - ☐ Negative
 - ☐ Neutral

Comments:

Please use the space below to provide any additional comments, questions, or suggestions you may have regarding the Project, the expropriation process, or the works on the Staničenje–Dimitrovgrad section:



QUESTIONNAIRE FOR BUSINESSES AFFECTED BY LAND EXPROPRIATION

Dear Sir/Madam,

The purpose of this questionnaire is to collect data required for the development of the Resettlement Action Plan (RAP), from representatives of business entities whose land is subject to partial expropriation as part of the Niš–Dimitrovgrad railway reconstruction and modernization project (Staničenje–Dimitrovgrad section). All collected data will be protected in accordance with the Law on Personal Data Protection and used exclusively for the purposes of this Project. Participation in this survey is voluntary. You are not required to answer any question you do not wish to, and you may withdraw from the interview at any time.

A. BASIC INFORMATION

1. Cadastral municipality in which the affected land plot is located:
 - ☐ Sopot
 - ☐ Pirot – Van Varoš
 - ☐ Pirot grad
 - ☐ Veliko selo
 - ☐ Vojnegovac
 - ☐ Sukovo
 - ☐ Gradište
 - ☐ Gojin Dol
 - ☐ Lukavica
2. Type of expropriation:
 - ☐ Full
 - ☐ Partial – please specify the surface area being expropriated: _____m²
3. Gender of respondent:
 - ☐ Male ☐ Female
4. Respondent's position in the business:
 - ☐ Owner / Director
 - ☐ Employee
 - ☐ Authorized representative

B. BUSINESS INFORMATION

1. Name of the company (or legal entity): _____
2. Type of business activity: _____
3. Year of establishment: _____
4. Is the company currently active?
 - ☐ Yes ☐ No ☐ Bankruptcy
5. Are business activities carried out on the affected land plot?
 - ☐ Yes ☐ No
6. Is the structure on the plot legalized?
 - ☐ Yes ☐ No ☐ No structure, land only
7. Year of construction or last renovation (if applicable): _____
8. Average monthly net income over the past 12 months:
 - ☐ Less than 100,000 RSD
 - ☐ 100,000 – 500,000 RSD
 - ☐ 500,001 – 1,000,000 RSD
 - ☐ More than 1,000,000 RSD



C. IMPACT OF EXPROPRIATION

1. Will the partial expropriation of the land affect your business operations?
☐ Yes, significantly
☐ Yes, to a lesser extent
☐ No impact
2. What specific impacts do you expect from the expropriation?
☐ Loss of clients and business
☐ Loss of projected income
☐ Loss of access to facilities or infrastructure
☐ Damage to machinery or equipment
☐ Loss of employee income due to work interruption
☐ Decrease in property value
☐ No impact due to minimal size of land being expropriated
3. Number of permanent employees in your company:
a) Of which household members: _____
b) Other employees: _____
4. Number of temporary (e.g. seasonal) workers:
a) Household members: _____
b) Other workers: _____

D. COMPENSATION AND FUTURE PLANS

1. What form of compensation do you prefer?
☐ Cash compensation
☐ Replacement land
☐ Other (please specify): _____
2. How would you use the compensation (if in cash)?
☐ Purchase of another land plot
☐ Business investment
☐ Other: _____

E. KNOWLEDGE OF EXPROPRIATION RIGHTS

1. Are you familiar with your rights in the expropriation process?
☐ Yes ☐ Partially ☐ No
2. Do you know whom to contact to protect and exercise your rights regarding expropriation?
☐ Yes, I know exactly whom to contact
☐ No, I don't know whom to contact
☐ I plan to obtain more information

F. AWARENESS AND ATTITUDES TOWARD THE PROJECT

1. How did you learn about the railway reconstruction project?
☐ Media
☐ Local government
☐ Neighbors/friends
☐ Directly from project representatives
☐ Other: _____
2. What is your opinion about the project?
☐ Positive



- ☐ Negative
☐ Neutral

Comments:

Please use the space below to provide any additional comments, questions, or suggestions you may have regarding the Project, the expropriation process, or the works on the Staničenje–Dimitrovgrad section:



Annex 6 – Grievance Form¹

Grievance Reference Number (to be filled in by HSSE Manager):			
Contact Details: Note: Grievances may be submitted anonymously. In such cases, the notification of the decision will be posted on the bulletin board at the location where the grievance was submitted.	Name:		
	Address:		
	If you would like to be informed about the resolution of your grievance by post, please provide your residential address:		
	Tel:		
E-mail:			
How would you like to be contacted/informed about the resolution? Please check the appropriate box.	By post:	By phone:	By email:
Details of your grievance. Please describe the issue, to whom it happened, when, where, and how many times, as relevant.			
What is your proposed way of resolving the grievance?			
Signature:		Date:	
Name and Surname of Contractor's Representative:			

¹ The grievance form for the local population will be printed exclusively in the Serbian language.



Annex 7 – Grievance Log Template

	Initiator					Person delegated to address grievances		Problem			
Number of the grievance	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