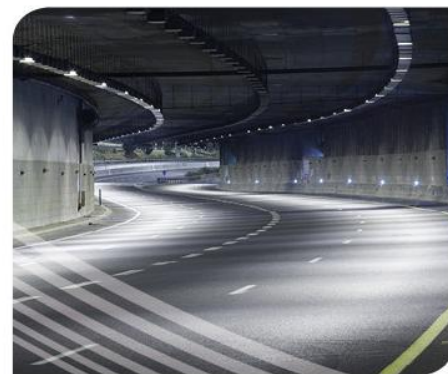




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STAKEHOLDER ENGAGEMENT PLAN (SEP)

RAILWAY LINE BELGRADE – NIŠ SECTION III PARAĆIN – TRUPALE (NIŠ)

EU PPF
PROJECT PREPARATION FACILITY



DOCUMENT CONTROL SHEET

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LIST OF ABBREVIATIONS AND ACRONYMS

EBRD	European Bank for Reconstruction and Development
EIB	European Investment Bank
ESIA	Environmental and Social Impact Assessment
ESS	(EIB's) Environmental & Social Standards
ESMP	Environmental and Social Management Plan
EU	European Union
IPAM	Independent Project Accountability Mechanism
MCTI	Ministry of Construction, Transport and Infrastructure
NTS	Non-Technical Summary
PIU	Project Implementation Unit
PRs	(EBRD's) Performance Requirements
RAP	Resettlement Action Plan
RPF	Resettlement Policy Framework
SEP	Stakeholder Engagement Plan
SEETO	Southeast Europe Transport Observatory
SRI	Serbian Railways Infrastructure



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GLOSSARY

Area of Influence	The geographic area, along with the people and communities within it, that may be affected by the project's activities either directly or indirectly, including impacts from related projects or other developments in the surrounding area.
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.
Environmental and Social Impact Assessment (ESIA)	The process of identifying, predicting, evaluating a project's positive and negative environmental and social impacts on the biophysical and human environment as well as identifying ways of avoiding, minimizing, mitigating and compensating, including offsetting in the case of the environment and remedying in the case of social impacts, by applying the mitigation hierarchy. This process includes consultation with direct and indirect stakeholders and the elaboration of an environmental and social management plan detailing the implementation of the mitigation measures.
Environment and Social Management Plan (ESMP)	The plan which forms part of the ESIA and sets out the measures required to maximise the benefits of the Project, avoid, minimise, mitigate and offset (in case of environment) or remedy (in case of social impacts) any adverse environmental and social impacts, together with budget and cost estimates, sources of funding, and adequate institutional, monitoring, reporting and accountability arrangements capable of ensuring proper implementation of and regular feedback on compliance with the environmental and social management plan.
Consultant	A team of various experts is engaged to conduct research, assist project's promoter in developing documents, and in implementing some of the stakeholder engagement activities during certain project's phases.
Local Community Office	The smallest administrative unit in the Republic of Serbia, represented by President, Vice President or Secretary of the Office.
Other interested parties (OIPs)	Refers to individuals, groups, or organizations with an interest in the project, stemming from project location, its characteristics, its impacts, or matters related to public interest (for example: regulators, government officials, the private sector, the scientific community, academics, unions, women's organizations, other civil society organizations, cultural groups etc.).
Project Implementation Unit (PIU)	PIU refers to the working unit, formed by the promoter, which is responsible for coordination of the execution of the project. In this project, promoter is organized through the SRI Department for the Implementation of EU-funded Projects.
Project	Reconstruction and modernization of the railway line Section III Paraćin – Trupale (Niš), railway line Belgrade-Niš.
Project Affected parties (PAPs)	Includes those individuals, groups or local communities affected or likely to be affected by the Project because of actual impacts or potential risks to their physical environment, health, security, cultural practices, well-being or livelihoods.
Project Promoter (Beneficiary)	Refers to the responsible state agency for project implementation, in this case Republic of Serbia Ministry of Construction, Transport and Infrastructure (MCTI) and Serbian Railways Infrastructure (SRI).
Resettlement Action Plan (RAP)	The document consistent with the principles and objectives of IFI's resettlement policies in which the responsible entity specifies the procedures that it will follow during land acquisition, restrictions on land use and resettlement and the actions that it will take to mitigate adverse effects, compensate losses, and provide development benefits to persons and communities affected by the Project in certain area.
Resettlement Policy Framework (RPF)	Document that sets out resettlement principles, institutional arrangements, eligibility criteria, valuation methods, consultation and grievance mechanisms, implementation and monitoring procedures, and budget guidance to be applied in preparing site-specific Resettlement Action Plans.
Stakeholder Engagement Plan (SEP) - this document	Documented process that describes how a project identifies, engages with, and manages relationships with local communities and other stakeholders who may benefit from, be affected by, or be interested in the project activities throughout the project lifecycle. The SEP outlines strategies and measures for stakeholder identification, communication, consultation, grievance management, and disclosure of project information to ensure meaningful participation, effective feedback, transparency, and a clear grievance mechanism through which stakeholders can raise concerns and comments.

1. INTRODUCTION

This Project is the reconstruction and upgrade of Section 3 (Paraćin – Trupale (Niš)) of the Belgrade-Niš railway. The railway route Belgrade-Niš represents one of the most important transport corridors in the Republic of Serbia and plays an important role in the concept of transport system development. The significance of the line is reflected in the importance of the connection of Central and Western Europe with Greece, Turkey and Middle East Asia. It is a part of South East Europe Transport Observatory (SEETO) Corridor X and connects Central and Western Europe with Greece, Turkey, and the Middle East, and also part of the indicative extension of the Core Trans-European Transport Network (TEN-T) rail network in the Western Balkans.

The overall Belgrade - Niš Railway Corridor Rehabilitation Project (hereinafter the Corridor Project) foresees the modernization and upgrade of the existing, primarily double-track 230km railway between Belgrade Centre (Resnik) and Niš, via Rasputnica G, Rakovica, Mladenovac and Lapovo. This is a part of the Belgrade Centre–State border (Tabanovce) railway. The Corridor Project aims to achieve a design speed of up to 200 km/h and enhance the quality and efficiency of passenger and freight rail services.

The railway from Belgrade-Niš represents one of the most important transport corridors in the Republic of Serbia. It is a part of the SEETO Corridor X (a pan-European rail corridor running through Serbia), as well as the TEN-T rail network in the Western Balkans.

The Corridor Project has been divided into three Sections:

- **Section 1:** Belgrade (Resnik) to Velika Plana,
- **Section 2:** Velika Plana to Paraćin,
- **Section 3:** Paraćin to Trupale (Niš), excluding the section from Stalać to Đunis, which is not part of this Project and is in a more advanced stage of project preparation. It should be noted that the end location of the Project is Trupale, however for planning purposes this also referred to as Niš, because it is part of the Belgrade- Niš Corridor Project.

This SEP is related only to Section 3: Paraćin-Trupale.

. The Project is currently on the level of preliminary design, and project information presented in this document is based on the level of detail available at the moment. The Project is under the direct management of the Public Enterprise Railways Infrastructure of the Republic of Serbia (Serbian Railways Infrastructure - SRI), which is also responsible for operational management based on Serbian legislative requirements. SRI is a State-Owned Enterprise with a positive track record in stakeholder engagement and implementation of Projects supported by International Financial Institutions.

The Project is expected to be co-financed by European Investment Bank (EIB), European Bank for Reconstruction and Development (EBRD) (together 'the Lenders'), and the European Union (EU) through the Western Balkans Investment Framework or other EU mechanism. The Project is categorised as "high-risk", category "A" project in accordance with EIB Group Environmental and Social Policy (2022).

In line with this classification, a comprehensive Environmental and Social Impact Assessment (ESIA) has been prepared. This categorisation requires not only the public disclosure of the ESIA and other key documents, but also a meaningful and inclusive consultation process with stakeholders. Disclosure is intended to be a transparent and proactive engagement effort—stakeholders will be given the opportunity to review project information, ask questions, and provide feedback. The project developer, SRI, with the support of qualified experts, will carefully consider all input received during this process. Where relevant, comments may lead to revisions of the ESIA, such as



improvements to mitigation measures or other project design adjustments, to ensure that stakeholder concerns are addressed, and potential impacts are managed.

This SEP is part of the Project disclosure package which includes: Scoping Report, Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Non-Technical Summary (NTS) of the ESIA, Resettlement Policy Framework (RPF), Resettlement Action Plan (RAP), Biodiversity Management Plan (BMP), Appropriate Assessment, Environmental and Social Action Plan (ESAP), and accompanying baseline studies.

This document is a Stakeholder Engagement Plan (SEP) describing the planned stakeholder consultation and engagement process for the Project, as well as the grievance mechanism for stakeholders to raise any concerns about the Project. The SEP will be updated by SRI at least once a year, as important Project information becomes available, whereby the updates shall also reflect any changes in stakeholders' dynamics, stakeholders' acceptance of the Project and their feedback throughout all project phases.

1.1 Location and Description of the Project

This Stakeholder Engagement Plan (SEP) is related to the **Paraćin-Trupale (Niš) - Section 3** of the Belgrade-Niš railway corridor, comprised of 2 sub-sections, namely:

1) Sub-Section Paraćin–Stalać, which runs from km 153+380 to km 174+171, with a total length of 20.8 km, shown on Figure 19.1), and

2) Sub-Section Đunis–Trupale (Niš), which runs from km 191+937.96 to km 229+642, with a total length of 37.7 km, shown on Figure 19.2 and Figure 19.3.

The Stalać-Đunis Section between km 174+171 and km 191+938 is not part of this SEP, while the SEP for this section is also available at the official SRI website.



Figure 1: Paraćin-Stalać sub-section

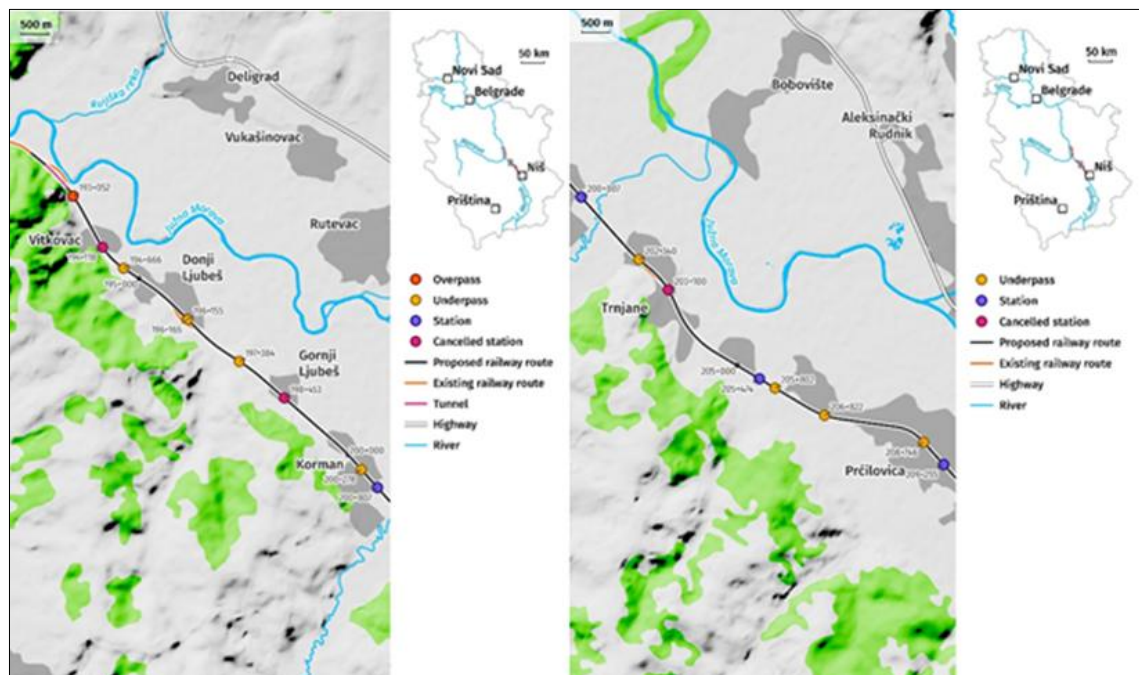


Figure 2: Đunis-Trupale sub-section, 1/2

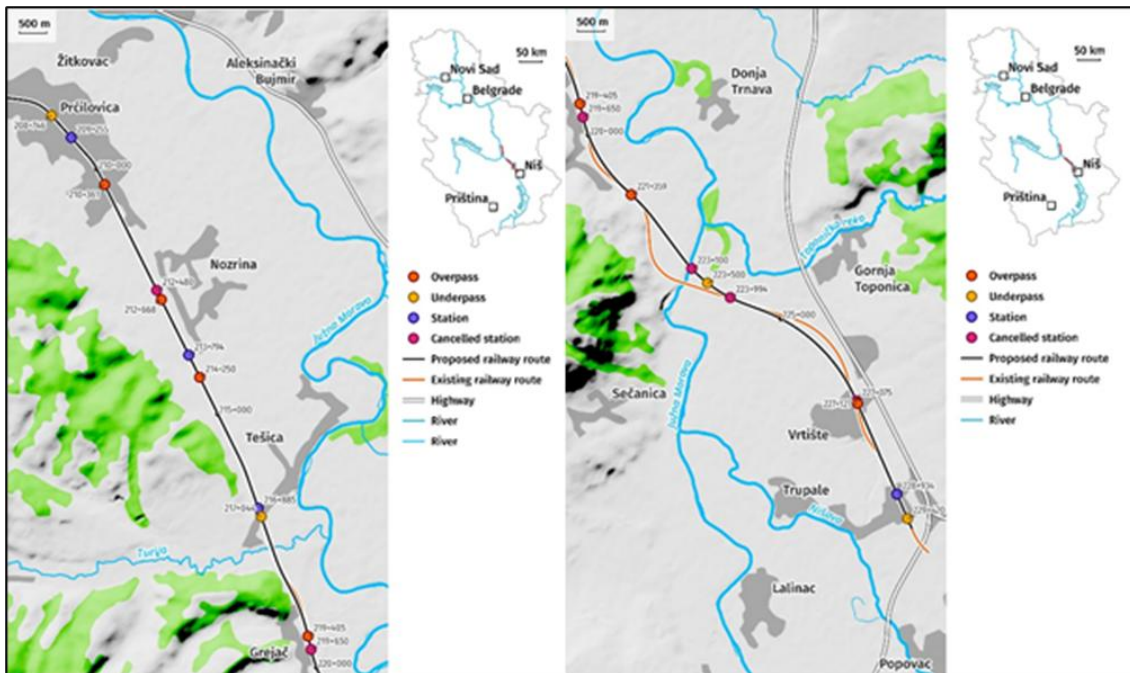


Figure 3: Đunis-Trupale sub-section, 2/2

The Paraćin–Stalać sub-section passes through two municipalities - Paraćin and Čičevac. The entire sub-section generally follows the existing railway line except for short deviations required for improvement of the turn radius located at the exit from settlement Striža and exit from village of Čičevac and runs mostly through agricultural land with the exception of the urban areas and villages.

The Paraćin–Stalać sub-section starts around 1.8km before the Paraćin railway station and ends 2.2km before Stalać railway station. It passes through the town of Paraćin and the gravitating urban communities Žabari and Striža on the right-hand side. Paraćin station will be reconstructed. From Striža, which is located on the outskirts of Paraćin, to Čičevac the railway line passes along the villages Ratara, Sikirica, Drenovac (which is divided on both sides of the railway), and Pojate, which borders Čičevac to the north. Ratara-Sikirica stop will be upgraded to stations, and Čičevac station will be reconstructed, while Drenovac stop will be decommissioned. Finally, the railway continues from Čičevac to the nearby village of Lučina where the sub-section Paraćin–Stalać ends at the exit of the village of Lučina. Lučina stop will be decommissioned.

The Đunis–Trupale (Niš sub-section) passes through three municipalities - Kruševac, Aleksinac and Niš. There are several deviations from the existing railway alignment required for improvement of the turn radius, affecting agricultural land and buildings. Similar to the Paraćin–Stalać sub-section, it runs through agricultural area with the exception of the urban areas and villages.

The Đunis–Trupale sub-section starts between Đunis and Vitkovac, around 2.1km from Vitkovac station, and ends at the exit of Trupale, around 0.5km from Trupale station. The sub-section commences with approximately 1.3km long deviation on the right (western) side of the existing alignment, of which approximately 1.1km is a tunnel construction, and rejoins the existing railway alignment before the village of Vitkovac which is spread on both sides of the railway. From the Vitkovac stop, which will be decommissioned, the new route makes a short deviation from the existing alignment into farmland on the left side and continues with a short run along the existing line until Donji Ljubeš, where it deviates again through buildings and farmland in the village of Donji Ljubeš. Donji Ljubeš stop will be decommissioned. The railway deviation continues after Donji Ljubeš for around 1km through farmland and houses



in Srezovac, where the new alignment keeps a straight line. After rejoining the existing alignment, the railway passes through Gornji Ljubeš, which is spread on both sides of the line. Gornji Ljubeš stop will be decommissioned.

Continuing along the existing alignment, the railway runs through agricultural land to the villages of Korman and then on to nearby Trnjane, which are also situated on both sides of the railway. Korman station will be reconstructed, while Trnjane stop will be decommissioned. There is a short but significant deviation through properties in Trnjane. From Trnjane the railway continues along the existing alignment through agricultural land to Donji Adrovac, located on the right side of the railway. Adrovac station located will be reconstructed.

Keeping the existing alignment, a short distance from Donji Adrovac the railway passes through the populated municipality of Aleksinac and attached settlements of Prčilovica, Žitkovac and Moravac, all spread on both sides of the railway. Aleksinac station will be reconstructed. From Moravac to the nearby villages of Stublina (left side), and Nozrina and Lužane (right side), the railway continues on the existing alignment along agricultural land. Nozrina stop will be decommissioned, Lužane reconstructed.

From Lužane to Tešica (located on both sides of the railway) and Bankovac (right side) the railway continues on the existing alignment along agricultural land. After Tešica/Bankovac through to village of Grejač (located on the right side) the route deviates across agricultural land. Tešica stop will be upgraded to a station and Grejač stop will be decommissioned.

After a short convergence with the existing alignment in the village of Grejač, the railway deviates again at the nearby Veliki Drenovac through farmland and forestry, then briefly touches the existing alignment at the outskirts of Veliki Drenovac, and makes a significant deviation again crossing agricultural land, forestry and Južna Morava river as it passes Supovac (located on the right side), and reaches the village of Mezgraja (situated on both sides of the railway). Supovački most and Mezgraja stop will be decommissioned.

At Mezgraja the new railway intersects the existing alignment and continues with a deviation through agricultural land into the village of Vrtište (situated on both sides of the railway). Vrtište stop will be decommissioned. At Vrtište the new railway again intersects the existing alignment deviating through local farmland and buildings until the exit of the village, where it rejoins the existing alignment into nearby village of Trupale (situated on both sides of the railway). Trupale stop will be upgraded to a station. The sub-section Đunis–Trupale (Niš) ends at the exit of the village of Trupale.

The preliminary design does not envisage significant deviations from the existing railway alignment on the Paraćin–Stalać sub-section, while on the Đunis–Trupale sub-section there are a few significant deviations which will create potential significant social impacts on the communities.



Table 1: Existing and planned stations and stops

Municipality	Existing Stations and Stops	Status After Project	Linear distance to Planned Stations	Planned traffic	Mother and child facilities
Paraćin	Paraćin station	Remaining		International, regional	Yes
	Sikirica–Ratari stop	Remaining, upgrade to station		Regional	No
	Drenovac stop	Closed	Approx. 2.5 km to the Sikirica–Ratari station		
Ćičevac	Ćičevac station	Remaining		Regional	No
	Lučina stop	Closed	Approx. 2.6 km to the Ćičevac station		
Aleksinac	Vitkovac stop	Closed	Approx. 5 km Đunis station		
	Donji Ljubeš stop	Closed	Approx. 5 km to Korman or Đunis station		
	Gornji Ljubeš stop	Closed	Approx. 4 km to Korman or Đunis station		
	Korman station	Remaining		Regional	No
	Trnjane stop	Closed	Approx. 2 km to Korman		
	Adrovac station	Remaining		Freight only	N/A
	Aleksinac station	Remaining		International, regional	Yes
	Nozrina stop	Closed	Approx. 3km to Aleksinac, 1.6km to Lužane		
	Lužane station	Remaining		Regional	No
	Tešica stop	Remaining, upgrade to station		Regional	No
	Grejač station	Closed	Approx. 2.6 km to Tešica		
Niš	Supovački most stop	Closed	Approx. 7.5 km to Tešica		
	Mezgraja stop	Closed	Approx. 7.0 km to Tešica		
	Vrtište stop	Closed	Approx. 2.5 km to Trupale		
	Trupale station	Remaining		Regional	No



Table 2: Existing and planned crossings Paraćin- Stalać sub-section

Municipality/ Settlement	Crossing Name	Chainage	Existing or new location	Status After Project	Type of Traffic	Vehicle diversion [m]
Paraćin	Overpass 1	153+941.53	New (IIA No. 158 to Šumadija)	Overpass	Vehicle, pedestrian	N/A
Paraćin Zabare	Level Crossing	155+532	Existing (at Šumadijska St)	Underpass for pedestrian/cyclist	Pedestrian, cyclist	Diverted to Overpass 1 1591m
Paraćin	Underpass 2	155+991.45	New (at Majora Gavrilovića St)	Underpass	Vehicle, pedestrian, cyclist	N/A
Paraćin	Underpass 3	156+851.81	New (vicinity of Striška St)	Underpass	Vehicle, pedestrian	N/A
Paraćin	Level crossing	156+860 appx	Existing (Striška St)	Closed	N/A	N/A
Paraćin	Level crossing	157+350 appx	Existing (informal crossing)	Closed	N/A	N/A
Paraćin Strizha	Underpass 4	158+955.08	Existing (Kralja Petra I St)	Underpass	Heavy goods vehicle, pedestrian	N/A
Paraćin	Level crossing	162+128	Existing	Closed	N/A	Diverted to Underpass 5 377m
Paraćin Ratari	Underpass 5	162+505.32	New (Vožda Karađorđa St)	Underpass	Heavy goods vehicle, pedestrian	N/A
Paraćin Sikirica	Level crossing	163+810	Existing (Ravnogorska St)	Closed	N/A	Diverted to Overpass 5/6 1305m/692m
Paraćin Sikirica	Underpass 6	164+502.60	Existing (Branka Krsmanovića St)	Underpass	Heavy goods vehicle, pedestrian	N/A
Paraćin Drenovac	Underpass 7	166+670	Existing (Beogradska St)	Underpass	Heavy goods vehicle, pedestrian	N/A
Paraćin Drenovac	Level crossing	168+180	Existing (Marka Kraljevića St)	Closed	N/A	Diverted to Underpass 8 970m
Ćićevac Pojate	Overpass 8	169+150.51	New (Atarski Put St)	Overpass	Agricultural vehicle (no pedestrian)	N/A
Ćićevac	Overpass 9	170+132.23	New (Zmaj Jovina St)	Underpass	Vehicle, pedestrian	N/A
Ćićevac	Underpass 10	171+793.08	Existing (Železnička St)	Underpass, single-lane	Vehicle, pedestrian	N/A
Ćićevac	Overpass 11	172+515.95	New (Radnička St)	Overpass	Heavy goods vehicle, pedestrian	N/A



Municipality/ Settlement	Crossing Name	Chainage	Existing or new location	Status After Project	Type of Traffic	Vehicle diversion [m]
Ćićevac	Underpass 12	173+134.14	New (Mirka Tomića St)	Underpass	Vehicle, pedestrian	N/A
Ćićevac	Level Crossing	173+678	Existing (Moravska St)	Underpass	Pedestrian, cyclist	Diverted to Overpass 12 521m

Table 3; Existing and planned crossings Đunis–Trupale sub-section

Municipality	Crossing Name	Chainage	Existing or new location	Status After Project	Type of Traffic	Vehicle diversion
Aleksinac Vitkovac	Overpass 1	193+051.67	New (JNA St)	Overpass	Vehicle	N/A
Aleksinac Vitkovac	Level Crossing	194+105	Existing	Closed		Diverted to Underpass 2 560m,
Aleksinac Vitkovac	Underpass 2	194+665.63	Existing (JNA-Save Kovačevića St)	Underpass	Vehicle	N/A
Aleksinac Vitkovac	Level Crossing	194+975	Existing	Closed		Diverted to Underpass 2 310m
Aleksinac Donji Ljubeš	Underpass 3	196+164.67	Existing (Jordana Pavlovića St)	Underpass	Vehicle, pedestrian	N/A
Aleksinac Donji Ljubeš	Level Crossing	196+550	Existing (Dragomira Kostića St)	Closed		Diverted to Underpass 3 386m
Aleksinac Srezovac	Underpass 4	197+383.93	Existing	Underpass	Vehicle, pedestrian	N/A
Aleksinac Gornji Ljubeš	Level Crossing	198+450	Existing (Dragomira Kostića St)	Closed		Diverted to Underpass 4 1067m
Aleksinac Korman	Underpass 5	200+277.95	Existing (to Kneza Lazara St)	Underpass	Vehicle, pedestrian	N/A
Aleksinac Korman	Level Crossing	200+360	Existing (to Kneza Lazara St)	Closed		Diverted to Underpass 5 83m
Aleksinac Korman	Level Crossing	201+390	Existing	Closed		Diverted to Underpass 5/6 1050m/950m
Aleksinac Trnjane	Underpass 6	202+340.17	Existing (Omladinska St)	Underpass	Heavy goods vehicle, pedestrian	N/A
Aleksinac Trnjane	Level Crossing	203+158	Existing	Closed		Diverted to Underpass 6/7 818m/2644m



Municipality	Crossing Name	Chainage	Existing or new location	Status After Project	Type of Traffic	Vehicle diversion
Aleksinac Donji Androvac	Underpass 7	205+802.46	Existing (Local road)	Underpass	Heavy goods vehicle	N/A
Aleksinac Donji Androvac	Underpass 8	206+821.81	Existing (Deligradska St)	Underpass	Agricultural vehicle	N/A
Aleksinac Prčilovica	Level Crossing	207+885	Existing (Vuka Karadžića St)	Pedestrian tunnel at 207+920	Pedestrian	Diverted to Underpass 8/9 1064m/860m
Aleksinac Prčilovica	Level Crossing	208+715	Existing (Local road)	Closed		Diverted to Underpass 9. 30m
Aleksinac Žitkovac	Underpass 9	208+746.36	Existing (Milentija Popovića St)	Underpass	Vehicle, pedestrian, cyclist	N/A
Aleksinac Moravac	Overpass 10	210+360.94	Existing (local road to IIA No. 217)	Overpass	Vehicle, pedestrian	N/A
Aleksinac Nozrina	Level Crossing	212+480	Existing (Local road)	Closed		Diverted to Underpass 11 188m
Aleksinac Nozrina	Overpass 11	212+668.35	Existing (Stublina-Nozrina road)	Overpass	Vehicle, pedestrian	N/A
Aleksinac Lužane	Level Crossing	213+756	Existing (Local road)	Closed		Diverted to overpass 11/12 1088m/493m
Aleksinac Lužane	Overpass 12	214+249.68	New	Overpass	Vehicle	N/A
Aleksinac Tešica	Level Crossing	215+710	Existing (Agricultural road)	Closed		Diverted to crossings 12/13 1461m/1334m
Aleksinac Tešica	Underpass 13	217+044.45	Existing (National road No. 217)	Underpass	Heavy goods vehicle, pedestrian	N/A
Aleksinac Tešica	Level Crossing	218+270	Existing (Cara Dušina St)	Closed		Diverted to crossings 13/14 1226m/1134m
Aleksinac Grejač	Overpass 14	219+404.75	Existing (Local road)	Overpass	Vehicle	N/A
Aleksinac Grejač	Level Crossing	219+863	Existing (Local road)	Closed		Diverted to overpass 14 459m
Aleksinac Veliki Drenovac	Underpass 15	221+359.49	Existing (Agricultural road)	Overpass	Vehicle	N/A
Crveni Krst (Niš) Mezgraja	Underpass 16	223+500.00	Existing (Peke Dapčevića St)	Underpass	Vehicle	N/A
Crveni Krst (Niš) Mezgraja	Level Crossing	224+205	Existing (Maršala Tita St)	Underpass at 224+180	Pedestrian, cyclist	Diverted to underpass 16 700m



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Municipality	Crossing Name	Chainage	Existing or new location	Status After Project	Type of Traffic	Vehicle diversion
Crveni Krst (Niš) Vrtište	Overpass 17	227+126.66	Existing (Beogradska St)	Overpass	Vehicle, pedestrian, cyclist	N/A
Crveni Krst (Niš) Vrtište	Level Crossing	227+850	Existing (Local road)	Closed		Diverted to overpass 17 724m
Crveni Krst (Niš) Trupale	Underpass 18	229+419.58	Existing (Železnička St)	Underpass	Vehicle, pedestrian	N/A

1.2 SEP purpose and goals

Operations and activities for which potential financing from EBRD and EIB is sought fall under the application of their respective applicable policies and requirements.

The Environmental and Social Policy of EBRD (2019) is document that guides the EBRD's commitment to promoting "environmentally sound and sustainable development" in the full range of its investment and technical cooperation activities. It sets out the ways in which commitment in practice and on EBRD supported projects is to be implemented. The EIB Environmental and Social Policy (2022) define guidelines and principles which are grouped across 11 thematic areas (Environmental and Social Standards) covering the full scope of environmental, climate and social impacts and issues, all of which shall be complied with in implementing EIB supported projects. A full description of the Lenders' requirements is given in chapter 2.

In response to the commitment to comply with EIB and EBRD standards, this SEP has been developed as an essential component in project planning, implementation and operation to establish a two-way communication channel with stakeholders who may be affected by or might be interested in the Project throughout its life cycle.

To ensure that stakeholders can raise concerns and provide feedback throughout the Project lifecycle, this SEP provides for the establishment of a grievance mechanism to handle complaints and offer redress. A full description of the grievance mechanism is given in chapter 7.

Public consultations for this Project will be arranged during the whole life cycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation. Information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analysing and addressing comments and concerns. The disclosure and consultation strategy for the Project is described in chapter 5.

Special attention is given to vulnerable groups, households and individuals, in particular women, youth, Roma, and elderly. Please see chapter 3.4 for details on how the participation of vulnerable groups will be encouraged.

This SEP will be maintained and updated by SRI, at least once a year.

1.3 SEP in relation to other Project documents and phases

The Stakeholder engagement represents a key component of the overall process of development of Environmental and Social Impact Assessment (ESIA) and subsequent implementation of project activities. Due to direct correlation between the outcomes of the ESIA process and identification of needs and requirements in relation to stakeholder engagement, this SEP has been developed taking into account the concerns and needs of the local population, which have been identified throughout the ESIA drafting process that has been implemented so far.

The main purpose of this SEP is to ensure that meaningful consultations and information exchange with the relevant stakeholders are implemented throughout project implementation by all the relevant parties. To this end, this SEP defines the methods and activities which shall be implemented in order to ensure full, equal and transparent approach to information and document disclosure throughout all project phases., as well as the manner in which all project-related communication shall be documented and shared with the relevant parties.

This SEP therefore includes communication and disclosure activities which shall be implemented by SRI throughout the upcoming project phases and activities, all in alignment with the impact identification and impact mitigation activities which are proposed by the ESIA, and which include:



- Additional research and surveys which are necessary for completion of a comprehensive description of the environmental, social and cultural heritage conditions;
- Identification and assessment of environmental, socio-economic and cultural heritage impacts;
- Development of the mitigation and enhancement measures and monitoring procedure;
- Preparation of an Environmental and Management Plan (ESMP).
- Development of a Resettlement Action Plan (RAP); and

At the time of preparation of this SEP, the ESIA phase is ongoing for this Project. This means that during this phase, stakeholders will have the opportunity to provide comments and raise technical and other questions to experts who are supporting the SRI. .. SRI, with adequate support from the Expert Team¹, will implement the planned engagement activities prescribed by this document, per the timeline and deadlines defined in the stakeholder engagement programme.

After the formal adoption of the Expropriation Study and the ESIA Report, SRI will develop the RAP with the support of the Expert Team.

Consequently, all the abovementioned documents, along with any additional documents and official environmental and social studies that may be required or developed for this project, shall be disclosed in the manner described in the SEP. .

1.4 Summary of potential environmental and social impacts

The potential Project level environmental and social impacts, which have been identified during the scoping phase and ESIA, and are the focal topics for stakeholder engagement activities, include, but are not limited to:

- Permanent and temporary acquisition of land;
- Physical or economic displacement, loss of assets, loss of livelihood and related compensation procedures;
- Impacts due to Station/Halt Closure;
- Impacts related to the closure of existing and the construction of new railway level crossings
- Severance impacts;
- Temporary restriction in relation to access to arable land;
- Labour influx;
- Temporary diversions and closure of rail routes and access roads;
- Community health and safety during construction works;
- Potential impacts on air quality due to movement of vehicles and equipment, earthworks, open piles of topsoil and spoil, and the operation of combustion engines; and/or

¹Expert team is composed of experts from various fields, such as environmental and social specialist



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Ministry of
European
Integration



This project is
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the European
Union



- Noise, dust, waste generation and traffic disturbance from construction vehicles and machinery;
- Generation of local income through the recruitment of workers from local communities to the project;
- The Project's added value and community benefits and support.

For more information on Social Impact Assessment please refer to Chapter 19 of the ESIA and Non-Technical Summary. Both documents are part of the Project disclosure package.

2. LEGAL FRAMEWORK

2.1 National Legislation Requirements

As a candidate for EU membership, Serbia is actively working to align its environmental protection standards with EU regulations, including those related to stakeholder engagement. While citizen participation is not regulated by a single, dedicated law in Serbia, its importance is embedded across a range of legal acts.

The Constitution of the Republic of Serbia (2006, amended in 2021), as the highest legal authority, upholds the principles of the rule of law, social justice, civil democracy, and the protection of human and minority rights, with a strong commitment to European values. It guarantees the right to a healthy environment and timely access to information about its condition, as well as the freedom of thought and expression, including the right to seek, receive, and share information and ideas through various means

Serbia has specific laws with requirements regarding disclosure and transparency:

- The Law on free access to information of public interest (2004 as amended in 2021) states that governmental agencies, social associations and officials are required to provide each person with the possibility of receiving and becoming acquainted with documents of public interest, except in cases anticipated by law. The Law shall govern the rights of access to information of public importance held by public authorities, with a view to exercising and protecting the public interest to know and attaining a free democratic order and an open society. By virtue of this Law access to information shall be granted to all stakeholders, including every natural person or legal entity upon written request unless otherwise regulated by the Law. Within 15 days of receipt of a request at the latest, the authority shall inform the applicant whether the requested information is available, and grant him/her access to the document containing the requested information or issue or send a copy of the document to the applicant, as the case may be;
- Law on Public Information and Media (2023) stipulates that public information is free and is not subject to censorship, and that the public has the right and interest to be informed on issues of public interest.

Besides the aforementioned, key legal acts regulating stakeholder and citizen engagement activities include, but are not limited to:

- The Law on Environmental Impact Assessment (2024) provides categorization of industries and projects and identifies types of environmental assessment required against respective categories of industries or projects and provides procedures for disclosure, presentation and consultation requirements, and sets these as mandatory;
- Law on Planning and Construction (2009 as amended in 2023) proclaims two types of engagement and disclosure instruments for all spatial and urban plans. Early public insight and Public Insight are mechanisms through which interested stakeholders may acquire information on the basic concept and the proposition of the planning document. Documents are made available to the public during a disclosure window of 15-30 days followed by public consultations;
- The Law on Expropriation (1995 as amended in 2016) enables state institutions to acquire property for projects deemed to be of public interest, while simultaneously protecting the interests of all persons with property rights whose property is slated for expropriation. The procedure involves the engagement of interested parties during the entire process, which begins with the declaration of public interest, until the payment of compensation. The Law on Expropriation prescribes the rights of affected owners to appeal at various stages of the expropriation procedure, beginning with administrative and judicial appeals (i.e. against

the decision on determining public interest, the expropriation resolution and regarding type or value of compensation).

Serbia has also ratified the Aarhus Convention on Access to information, public participation in decision-making and access to justice in environmental matters. The Convention applies both to government organisations but also any other natural or legal persons having public responsibilities or functions or providing public services.

2.2 EIB and EBRD Stakeholder Engagement standards

EBRD and EIB recognise the importance of stakeholder engagement as an essential element of good international practice and corporate citizenship. Such engagement is also a way of improving the environmental and social sustainability of projects. In particular, effective community engagement is essential for successful management of a project's environmental and social risks and impacts. Stakeholder engagement is central to achieving enhanced community benefits from a project.

Preparation of this SEP has taken into account the provision of EBRD's Environmental and Social Policy (2019) and Access to Information Policy and Directive (2019) and EIB Environmental and Social Standards grouped across 11 thematic areas covering the full scope of environmental, climate and social impacts and issues.

The following elements of EBRD PR 10 and EIB ESS 2 will be applicable for Stakeholder Engagement of the Project in addition to the national requirements.

Stakeholder identification and analysis: The first step in successful stakeholder engagement is the identification of various individuals and groups who (i) are affected or likely to be affected (directly or indirectly) by the Project (affected parties), or (ii) may have an interest in the Project (other interested parties), with a specific attention to individuals and groups disadvantaged or with vulnerable status.

Stakeholder Engagement Plan: EBRD's and EIB's clients are required to develop a Stakeholder Engagement Plan that will outline how communication with identified stakeholders will be handled throughout project preparation and implementation, including the grievance procedure envisaged.

Disclosure and consultation: Pursuant to EBRD's risk classification, Category A projects (including the Project in term) require carrying out a comprehensive assessment of environmental and social impacts (ESIA). Disclosure and consultation requirements must be built into each stage of the ESIA process. Category A projects require a disclosure period for a minimum of 120 days. In addition, EIB requirements stipulate development of a complete ESIA in accordance with the classification of projects based on Annex I and II of the EIA Directive.

Information disclosure: Disclosure of relevant project information helps stakeholders better understand the risks, impacts and opportunities associated with the Project. SRI will disclose relevant project information in the local language(s) and in a manner that is accessible and culturally appropriate, taking into account the specific needs of groups that are differently or disproportionately affected by the project, as well as groups with specific information requirements.

Meaningful consultation: The consultation process with affected parties will be undertaken in a manner that is inclusive and culturally appropriate, and which represents the views and specific needs of various groups. Meaningful consultation will be carried out on an ongoing basis as the nature of issues, impacts and opportunities evolve.



Ongoing reporting to relevant stakeholders: Providing information to identified stakeholders, on an ongoing basis, appropriate to the nature of the Project and its adverse environmental and social impacts and issues, and the level of public interest throughout the life of the Project.

Grievance mechanism: Establishment of an effective grievance mechanism to receive and facilitate the resolution of stakeholders' concerns and grievances, in particular, about the environmental and social performance of the project. The Client will establish an effective grievance mechanism as early as possible in the project development process.

EBRD's Access to Information Policy and Directive (2019) sets forth disclosure of information a consultation with the public ways in order to fulfil EBRD's committed to enhancing transparency and accountability, improving discourse with affected stakeholders and fostering good governance in respect of all its Operations and Activities. The project documentation will be disclosed for public on the EBRD website in accordance with this Policy.

*"All projects financed by EBRD shall be structured to meet the requirements of the EBRD **Environmental and Social Policy** which includes ten Performance Requirements (PRs) for key areas of environmental and social sustainability that projects are required to meet, including PR10 Information Disclosure and Stakeholder Engagement. In addition, EBRD's **Independent Project Accountability Mechanism (IPAM)**, as an independent last resort tool, aims to facilitate the resolution of social, environmental and public disclosure issues raised by Project-affected people and civil society organizations about EBRD financed projects among Project stakeholders or to determine whether the Bank has complied with its ESP and the Project-specific provisions of its **Access to Information Policy**; and where applicable to address any existing non-compliance with these policies, while preventing future non-compliance by the Bank."*

EIB Group Transparency Policy (2022) is defined in the manner that it relies on the following guiding principles: **openness; ensuring trust and safeguarding sensitive information; willingness to listen and engage**. In addition, this policy strongly encourages **non-discrimination and equal treatment**, whereby it stipulates that "Every member of the public has the right to request and receive timely information/documents from the EIB without suffering from any retaliation. When considering such a request for information/documents, the EIB does not discriminate or give special privileged access to information/documents". EIB is part of the **EIB Group Complaints Mechanism Policy**, which "recognises the right of the members of the public to lodge a complaint concerning alleged maladministration against the EIB and provides the public with a tool enabling alternative and pre-emptive resolution of disputes. Any natural or legal person who alleges a case of maladministration by the EIB Group, which includes failure to deliver according to its Transparency Policy, may lodge a complaint with the EIB Group Complaints Mechanism within one year from the date on which the facts upon which the allegation is grounded could reasonably be known by the complainant."

2.3 Gaps between the Serbian legal framework and EIB ESS and EBRD PRs

The following gaps between RS legislation and EBRD/EIB requirements have been identified:

- Both Lenders require the development of a Stakeholder Engagement Plan, to guide the disclosure of Project documents and consultations with affected people and other stakeholders;
- Both Lenders require a proactive approach in obtaining public opinions and identifying and engaging with all stakeholders, as opposed to a reactive approach i.e., responding only to comments/questions submitted and issues raised, after they have been submitted/raised;



- Particular attention is required by EBRD/EIB to identifying and engaging with vulnerable groups;
- Consultations with persons affected by land acquisition should be ongoing throughout the entire project lifecycle, in accordance with EBRD and EIB requirements
- The establishment and implementation of a dedicated Project grievance mechanism (accessible for all stakeholders, including vulnerable groups) is required by EBRD/EIB, in addition to national administrative and judicial grievance procedures;
- Consultations with stakeholders, according to EBRD/EIB requirements, should be ongoing for the duration of the Project as opposed to consultations concentrated during the permitting period.

This SEP has been developed to address the above listed gaps and to ensure that all EBRD/EIB requirements in connection to stakeholder engagement are being adequately addressed by the Project.

3. STAKEHOLDER IDENTIFICATION AND ANALYSIS

Stakeholder identification and analysis was implemented in compliance with the principles set out in EIB Environmental and Social Standards (ESS) 2022 and EBRD Environmental and Social Policy (ESP) 2019. The two main categories of stakeholders include Project Affected Parties and Other Interested Parties, along with their respective sub-categories. In addition, this SEP identifies disadvantaged/vulnerable parties, in regard to which a tailored approach to consultation has been developed and presented in the relevant chapter. Thereby, the stakeholder groups which have been considered as part of this SEP are:

I Project Affected Parties (PAPs) as those who are likely to be affected by the project (directly or indirectly) due to their exposure to project risks and impacts related to economic and physical resettlement, livelihoods, community health and security, environmental impacts, labour and working conditions, cultural and historical values. This group includes individuals, households, legal entities or other groups in the local communities in the project area who are going to be exposed to environmental and/or social project impacts. It is due to their direct 'involvement' in the project as the direct 'recipients' of the project that this group represents the primary stakeholder who shall be included in all project-related consultations, as this group is recognised as the one which has immediate and most extenuating needs and requirements during all project phases. Additionally, it is important to note that this group consists of the following sub-categories:

- **Directly affected parties** are exposed to the impacts of the project which are manifested at once in the immediate project area. Those are people affected by the land or structures acquisition, businessman and employees affected by economic displacement etc;
- **Indirectly affected parties** are people who will suffer consequences other than direct effects, over time, due to disruption or changes in economy, critical infrastructure, basic services, such as transport, utilities, social and health. These are, for example, the owners of local cafes, shops, etc. which will be affected by the presence of workers engaged in the project;
- This category also includes communities' representatives who are able to provide information and express some of the general views for the project-affected communities, even if they are not directly affected themselves (for example: President of Local Community Office - LCO).

II Other Interested parties (OIPs) are individuals, groups and organizations with relevant interest, influence or participation in the project:

- Stakeholders having an interest in or influence over the project: These are people or institutions who are not necessarily impacted by the project in the sense that they are located in the project area, but have a strong interest in it, such as academic institutions, NGOs, business associations, trade unions or human rights defenders;
- Stakeholders participating in the project: This category includes (i) institutions, groups and individuals who have various roles in the project, such as authorities who are involved in approving, inspecting or implementing aspects of the project and (ii) engaged project contractors and workforce.

III Disadvantaged/vulnerable individuals, households or groups include those who may be more likely to be adversely affected by the project impacts and/or more limited than others in their ability to take an active role in project-related consultation and/or achieve project benefits. Vulnerable people are more likely to be excluded from/unable to participate fully in the overall consultation process and as such may require specific measures and/or assistance to do so. The disadvantaged or vulnerable status of these individuals and/or groups could potentially lead to them being differentially or disproportionately affected by the project. Thereby, identification of such stakeholders is essential for development and tailoring of stakeholder communication and engagement



means and tools, so as to ensure that their duly and justly provided with the same conditions and opportunities for involvement in the project-related consultations and information disclosure. In this context, this group includes the following community members/representative groups:

- school pupils
- retired individuals
- elderly and people with disabilities
- people living alone or without support
- people with mobility impairments, people with vision and/or hearing impairments
- people who require regular psychosocial assistance
- people with chronic diseases (e.g. people who require regular access to dialysis, geriatric services, etc.)
- single parent headed households
- women and children/youth without parental care
- people with low literacy and ICT knowledge
- Roma
- economically marginalized and disadvantaged groups, persons living below the poverty line

3.1 Methodology applied to identify the affected settlements and area of influence (Aoi)

The objective of the stakeholder identification process is to make a clear delineation between the abovementioned stakeholder groups, and tailor the stakeholder engagement, consultation and information disclosure means to meet their needs and expectations.

To assist with the initial identification of affected communities, a set of 'distance' criteria has been applied in determination of the Area of Influence (Aoi). The identification of the Aoi is based on the layout proposed in the Preliminary Design (which was developed on the basis of spatial planning documentation), associated infrastructure, public services and utilities, existing rail activities, the type and location of anticipated impacts. The analysis of these factors indicates that the Aoi can be located by combining a number of criteria:

- The linear corridor between the affected municipalities and communities within the corridor;
- Area of direct physical footprint;
- 8m width left and right from the axes in rural areas and 6m in urban of the centreline of the outer rail (with an additional 4 m buffer zone) for land acquisition;
- 2km around the boundary of the designated physical footprint;
- The impacts to cultural heritage features observed encompasses a 500m wide corridor on each side of the planned railway alignment;
- Rail level crossing;
- Stations and halts;
- Access and transport routes;
- Any associated facility;
- The temporary construction and permanent operation phase facilities;
- Any transmission lines.

In addition to the technical inputs, as well as all prior stakeholder engagement activities which have been implemented over the past years, direct consultations for the purpose of development of SEP and SIA were held with all local communities along the project footprint. These new meetings were held in May 2025, and they were



aimed at direct consultations with PAPs who reside in the project area, all with the aim of obtaining their inputs in relation to their expectations for the project and identification of their individual and/or group needs and requirements in relation to project communication and avoidance and/or mitigation of project impacts.

It is important to note that stakeholder identification and analysis shall be implemented throughout project life cycle, so as to account for any changes in community dynamics. The list of stakeholder groups shall be subject to regular review and updating, which shall be done through regular cooperation between SRI, local municipalities and the contractor, whereby the table which presents the stakeholders shall be periodically updated so as to reflect any and all changes to the stakeholders in the project area, as well as the planned stakeholder engagement activities and the pertaining timeframe for implementation of engagement activities.

3.2 Project Affected Parties (directly and indirectly)

The PAPs of the Project are likely to extend over the following groups of stakeholders:

- a. **Households affected by physical displacement, including employees of SRI as tenants;**
- b. **Households affected by economic displacement;**
- c. **Businesses and employees** affected by physical displacement, including farmers;
- d. **Businesses and employees** affected by economic displacement, including farmers;
- e. **Local communities and persons** residing in areas where the Project specific works will be executed and which are affected by loss of infrastructure access, limitation of utilities, public services, halt/station closure, noise, dust, damage, emissions, vibrations etc.;
- f. **Vulnerable groups, households and individuals (see section 3.4 below for a detailed discussion);**
- g. **Municipalities affected by the Project and the relevant departments;**
- h. **Businesses in the project area** whose land and/or facilities are not subject to economic and/or physical displacement but may experience temporary loss of access to their premises, logistical issues due to alterations of the access roads, changes in supply chain due to economic and/or physical displacement of other businesses
- i. **Passengers** including daily commuters (students, high school students, persons employed in nearby cities), railway transport operators and tourists.

3.3 Other Interested Parties and cumulative effects

Other Interested Parties (OIPs) in relation to this project have been identified on the basis of the wider context and the need and/or willingness for either direct or indirect involvement of the relevant parties in the project. Involvement of these parties may be expected in different phases of the project life cycle, whereby stakeholders such as public services/public utility companies and local emergency services are expected to be involved during the construction phase, due to the nature and scope of their services. Stakeholders who may have an interest in the project and/or who may require involvement in the project due to the pertaining cumulative effects have been identified in relation to the dependencies between their regular activities and the project activities. For instance, the national and local authorities are expected to tailor some of their activities to the needs and requirements of this project, due to the fact that this project is in national interest, and it is going to require alignment with other local and national projects and priorities.



Additionally, the relevant institutions are going to be included in the project from the perspective of the permitting procedures, project supervision and control of the processes which are regulated by the national legislation. When it comes to providers of public services and public utility companies, their involvement in the project is expected due to the fact that other local projects, infrastructure developments and regular provision of local communal services which are planned to be implemented in the project area (e.g. water supply improvements, stormwater drainage, sewage system improvements, WWTPs, road infrastructure, waste management, etc.) are going to have to be aligned with the subject project, so as to ensure undisturbed provision of all local services, alignment of local development projects with the subject project, as well as provision of all services which are going to be necessary during construction and operation of the subject project. Thereby, involvement of stakeholders which have been recognised as the ones who are going to be subject to cumulative effects is primarily related to the construction and operation phase of the project.

On the other hand, stakeholders such as NGOs, local and national institutions, may engage in project activities any project phase, as they are expected to have inputs during the preparatory phase, as well as during the construction and operation phase. This expectation in regard to their engagement in the project stem from the stakeholder engagement activities which were implemented during the preparatory stakeholder engagement which was carried out prior to development of this SEP.

Accordingly, the following groups of other interested parties and stakeholders have been identified:

- Local Public services/public utility companies
- Local emergency services
- Relevant national institutions
- Relevant local institutions
- NGOs
- Academic institutions
- IFIs
- Media, printed and electronical

3.4 Disadvantaged or vulnerable groups

Disadvantaged and vulnerable individuals/groups require dedicated stakeholder engagement, so as to ensure minimisation of any disproportionate impacts that they may experience during project implementation and/or operation. Diligent stakeholder engagement with these groups is also essential for understanding whether they require any additional assistance in relation to accessing all project information, stakeholder engagement activities and/or assistance in accessing all the legally available processes and means of human and legal rights protection during the expropriation process. Identification of additional requirements in relation to access and assistance during the preparatory phase of the project has to be implemented through targeted consultations which are going to be carried out prior to commencement of project activities on site, i.e. prior to commencement of expropriation and/or any construction activities.

When it comes to the construction phase, preparatory consultations need to be carried out with the identified disadvantaged and/or vulnerable groups in order to determine the type and frequency of assistance they may need during construction. The most prominent type of assistance that these groups may need during the construction phase are related to medical care and assistance, including access to regular and emergency health services, access to geriatric services, assistance with mobility. Assistance during the construction phase is of highest importance since



the project is going to include extensive removal of the existing railway crossings and halts, which may have significant impacts on mobility and accessibility of people who are in need of medical assistance. Thereby, consultations which are going to be carried out during the preparatory phase, as well as prior to commencement of construction, must be aimed at obtaining information about the needs and requirements of the vulnerable and/or disadvantaged groups in relation to access to all the necessary services and information.

In this context, this segment of stakeholder engagement shall take into account alternative means of information dissemination (e.g., preparing audio-visual material, in-person meetings), cooperation with all the relevant local services which can provide further assistance in providing help to those in disadvantaged position (e.g. Red Cross, social services, emergency services), as well as cooperation with the local legal departments which can provide duly information and assistance during the expropriation process (e.g. transitional assistance, assistance in accessing legal services).

As previously mentioned, stakeholder engagement activities were conducted in preparation for development of this SEP. As part of the process, a number of NGOs and associations were identified with which it was intended to discuss the matters of vulnerability of groups and individuals within each of the project-affected communities. However, despite the efforts put into scheduling meetings with these NGOs and associations, the meetings were not held. This was due to this fact that this section identifies only the general groups that need to be considered during the process of overall stakeholder engagement which is going to be implemented in the upcoming project phases. In this context, the crucial step to identification of specific vulnerable and/or disadvantaged groups and individuals is completion of expropriation study, after which it is going to be possible to take into account the specific community members and/or groups who require additional assistance and tailored consultations prior to and during project implementation. However, based on screening of the local communities and the local context, the disadvantaged and/or vulnerable groups that shall be taken into account during all project phases are as follows:

- school pupils
-
- elderly and people with disabilities people living alone or without support
- people with mobility impairments, people with vision and/or hearing impairments
- people with chronic diseases (e.g. people who require regular access to dialysis, geriatric services, etc.)
- single parent headed households
- women² and children/youth without parental care
- people with low literacy and ICT knowledge
- Roma
- economically marginalized and disadvantaged groups, persons living below the poverty line

This project has still not included targeted consultations with and/or identification of Roma population in the project area. However, this activity will be carried out prior to project implementation,. It is due to the specificities of organisation of livelihoods, traditional customs and social and economic standing of the Roma population that their identification must be duly carried out over the course of the project, and prior to any expropriation. Thereby, , targeted stakeholder engagement activities shall be carried out with Roma communities and/or individuals (if they are identified in the project AoI), whereby these activities shall be carried out in the form of focus group discussions with the local Roma population and local Roma NGOs so as to determine any needs for special assistance they may

² Women are often not registered as title holders, which may disadvantage them in expropriation. They also tend to use the railway more than men, especially elderly women who often do not drive.



require for accessing any of the communication channels, legislative procedures and/or any other matters of essence for ensuring their rightful and full inclusion in the negotiation process and project implementation as a whole.

3.5 Gender considerations

Stakeholder engagement process is going to be implemented with due attention to gender awareness and equal access to opportunities and inclusion in all phases of the project. Consultations with local communities which were carried out in preparation for this SEP showed a high degree of interest of both male and female members of the affected project communities. Due to the limited time available for consultations at this stage, focus groups with the affected women in the local communities were not held. However, these focus groups shall be organised once the expropriation study is finalised, whereby women from local communities shall be consulted with through focus groups which are going to be organised in all affected local communities. Additionally, the focus groups shall not only include the official land/object title holders, but they shall also include women who live in households which are going to be subject to expropriation. This approach is aimed at ensuring fair and equal access to negotiation opportunities to all community members, all while emphasising the gender and inclusion aspects.

The focus groups shall be implemented as soon as the expropriation study is prepared, so as to ensure that the rights and needs of women, both on the level of local communities and in the context of households (livelihood activities, needs for assistance), are fully taken into account during land valuation and proposal of compensation and assistance. Outcomes of these stakeholder engagement activities are going to be incorporated in the subsequent activities which are going to be implemented for the purpose of this project, such as preparation of RAP. This is due to the fact that gender considerations must be included in any action plans which are going to be implemented for the purpose of the project, so as to ensure that any disproportionate negative impacts are duly mitigated (e.g. negative impacts on dominantly female livelihood activities, impacts on traditionally female-assumed roles in households and local communities, either of which may be caused by expropriation and/or construction).

To conclude, the abovementioned disadvantaged and vulnerable groups have been identified and described based on initial information from site and overall project context. However, further activities shall be implemented so as to ensure that all individuals, groups and households who require additional assistance in relation to achieving all their rights in relation to mitigation of project impacts, have been duly identified and that their needs and requirements have been met throughout all project phases. Thereby, further identification of these stakeholders and identification of their needs is going to be carried out through subsequent phases of development of project documentation, while SEP is going to be updated accordingly.

3.6 Stakeholder list

Stakeholder list has been developed on the basis of stakeholder identification and analysis, whereby this table presents each of the abovementioned categories and their respective positions in relation to their interest in the project. This table presents two distinct groups (external and internal stakeholders) which present the position of each of the abovementioned categories.



Table 4: Stakeholder list

STAKEHOLDERS		
	Category	Local communities
PA	Persons affected by physical displacement, including employees of SRI as tenants	<u>Settlements and local communities in Niš (including local municipality Crveni Krst), Paraćin, Aleksinac, , Kruševac, Čičevac:</u>
	Persons affected by economic displacement	
	Businesses and employees affected by physical displacement, including farmers	
	Businesses and employees affected by economic displacement, including farmers	
	Local communities and persons residing in areas where the Project specific works will be executed and which are affected by loss of infrastructure access, limitation of utilities, public services, halt closure, noise, dust, damage, emissions, vibrations etc.	11. Kongres, Vrapčane, Striža, Ratare, Sikirica, Drenovac, Pojate/Čičevac, Lučina, Stalač, Vitkovac, Donji Ljubeš, Srezovac, Korman, Trnjane, Donji Adrovac, Prčilovica, Žitkovac, Moravac, Nozrina, Lužane, Tešica, Grejač, Veliki Drenovac, Mezgraja
	Presidents of Local Community Offices in the affected settlements	
	Vulnerable groups, households and individuals	
	Railway sector: <ul style="list-style-type: none"> Srbija Kargo Srbija Voz Private railway operators 	
	<ul style="list-style-type: none"> Municipalities affected by the Project and the relevant departments Local tourist organisations 	<ul style="list-style-type: none"> Municipality Paraćin Municipality Čičevac City of Kruševac Municipality Aleksinac Municipality Niš, including local municipality Crveni krst
	Businesses in the project area whose land and/or facilities are not subject to economic and/or physical displacement	
	Passengers including daily commuters (students, high school students, persons employed in nearby cities) and tourists.	
OIPs	Public utility companies in the region or municipalities where the new railway will pass , responsible for waste management, water supply, electricity supply, gas supply, development and implementation of local infrastructure development projects.	<ul style="list-style-type: none"> Municipality Paraćin Municipality Čičevac City Kruševac Municipality Aleksinac Municipality Niš, including local municipality Crveni krst
	Local emergency services, fire brigades, local police	
	<ul style="list-style-type: none"> Local providers of health services, including health centres, Red Cross, geriatric services, centres for social services 	
	NGOs and other interested organisations, including hunting associations, associations for human rights protection, associations for protection of women rights, Roma organisations	



STAKEHOLDERS	
	Ministry of Finance
	Ministry of European Integration
	Ministry of Internal Affairs
	Ministry of Environmental Protection and relevant departments
	Chamber of Commerce
	Institute for Nature Conservation of the Republic of Serbia – Belgrade and Department in the City of Nis
	Cultural heritage protection institutes and agencies, at the national and local levels (Republic Institute, Institute for protection of cultural heritage Belgrade, Institute for protection of cultural heritage Nis)
	PWC Srbijavode
	PE Roads of Serbia
SRI	Ministry of Construction, Transport and Infrastructure
SRI	SRI Management
	SRI PIU for the Railway project
	SRI employees
Contractors	Main contractor
	Subcontractor(s)
	Project workers (internal and external)
	Suppliers

4. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

This section presents information about all previous official stakeholder engagement activities which were implemented and recorded as part of this project. This section is going to be duly updated throughout project implementation, so as to ensure that the SEP duly reflects information about all stakeholder engagement activities.

Stakeholder engagement and information sharing began with early public hearing on the Spatial Plan for the Special Purpose Area of the Infrastructure Corridor of the Belgrade–Niš Railway Line conducted in March 2020 and continued in 2021, with initial meetings aimed at gathering baseline data, understanding the local setting, and assessing potential impacts on cultural heritage and socio-economic conditions with the aim of preparing the Environmental and Social Assessment (ESA). Pre-Feasibility Study for the Corridor (PFS), Stakeholder Engagement Plan (SEP), Scoping Report (SR), Environmental and Social Action Plan (ESAP), Environmental and Social Management Plan and Resettlement Policy Framework (RPF) were developed and disclosed in 2022. By 2024, discussions turned to spatial planning, with an emphasis on incorporating feedback from local stakeholders into project planning. In 2025, the latest round of consultations supported the development of the ESIA and SEP, highlighting the views, concerns, and expectations of both local communities and municipal representatives.

Also, multiple meetings and communication with stakeholder were exchanged between SRI, Expert Team, MTCI and other engaged Governmental bodies to discuss the Project design and priority needs. Communication with stakeholders has taken place through multiple channels: email correspondence, telephone communication, meetings, public consultations with adequate PPT presentations with the representatives of the affected municipalities and communities' representatives.

The most important stakeholder engagement activities undertaken are presented in the table below:

Table 5: Summary of previous engagement activities

Stakeholder	Period, Methods, and Location of Engagement	Key Issues, Suggestions, and Information Gathered
National Stakeholders		
		■
		■
Institute for the Protection of Cultural Monuments of the Republic of Serbia	September – October 2021	<ul style="list-style-type: none"> ■ Providing information on Cultural Monuments (CM) categories expected to be affected and opinions regarding impacts on CM ■ Maps of cultural monuments including buffer zones, coordinates, and distance from the railway ■ Suggestion for possibilities to review the road track in case of affected buffer zone or when no buffer zone is declared for the monument to be consider ensuring associated facilities are covered



Stakeholder	Period, Methods, and Location of Engagement	Key Issues, Suggestions, and Information Gathered
		<ul style="list-style-type: none"> Key data for gap analysis comparing EIB/EBRD requirements to national provisions Insight into previous engagement levels in large-scale infrastructure projects
Ministry of Finance	October 2021	<ul style="list-style-type: none"> Obtain information necessary for Resettlement Policy Framework (RPF) preparation and mitigation measures Consultation on Ministry's involvement in the consultation process
Local stakeholders		
Municipalities (Mayors, representatives of Environment, Forestry and Water Management Directorates, Urban Planning, Agriculture, Civil Registry Offices)	September – October 2021	<ul style="list-style-type: none"> Provision of baseline data (demographic, social, economic, etc.) Consultations on key impacts and mitigation measures Opinions on the Project Understanding of land acquisition processes and the municipality's role Urban planning information Main concerns and suggestions regarding public health and safety of residents in the project area
Institute for Nature Protection of Serbia (Belgrade)	January 2022	<ul style="list-style-type: none"> Expert opinion provided on: <ul style="list-style-type: none"> - Overall situation - Biodiversity impacts - Barrier effects - Potential NATURA2000 sites - Cumulative effects
		<ul style="list-style-type: none">
		<ul style="list-style-type: none">
Hunting Association of Serbia	January 2022	<ul style="list-style-type: none"> Expert opinion provided on: <ul style="list-style-type: none"> - Overall situation - Biodiversity impacts - Barrier effects - Potential NATURA2000 sites - Cumulative effects



Stakeholder	Period, Methods, and Location of Engagement	Key Issues, Suggestions, and Information Gathered
Representatives of Local Communities (Heads of local offices)	January – February 2022	<ul style="list-style-type: none"> Provision of baseline data on demographic, social, economic, and other local conditions Consultations on key impacts and mitigation measures Opinions on the Project Main concerns related to closure of railway stations and level crossings
Representatives of Local Self Governments (Mayors, municipal urban planners, representatives of relevant Public Utility Companies, Centres for Social Welfare)	February 2024	<ul style="list-style-type: none"> Introductory information meetings with representatives of the municipalities Overview of the key aspects of the Project Potential impacts of the Project
Representatives of Local Self Governments and members of local communities	March 2024	<ul style="list-style-type: none"> Field data collection focused on key Project locations affecting local communities and structures subject to expropriation
Representatives of Local Self Governments (Mayors, representatives of relevant Public Utility Companies, Centres for Social Welfare)	May 2025	<ul style="list-style-type: none"> Feedback on general attitudes toward the Project Key concerns identified from the perspective of LSG Information on the priorities and expectations of LSGs
Representatives of Local Communities (Heads of local offices) and members of local communities	May 2025	<ul style="list-style-type: none"> Key concerns identified from the perspective of Local Communities
EIB, EBRD, JASPERS, EU Delegation to Serbia	Monthly Virtual progress meetings and several technical E&S meetings with MFI experts and national experts involved in sub-projects	<ul style="list-style-type: none"> Discussions on project progress, data gaps, and definition of next steps within the project

4.1. Communication with the stakeholders – Publishing the Scoping Report (SR) of the Railway line Belgrade – Niš, Section III Paraćin – Trupale (Niš)

In June 2024, the SRI website published the Scoping Report ESIA Railway line Belgrade-Niš: section 3 Paraćin-Trupale in both English and Serbia, together with its Non-Technical Summary, which provides basic information about the Project, its characteristics, objective and potential impacts, along with detailed information on specific ecological, climate and social features of the Project area. The documents were also made available on the official websites on the municipalities located along the route of this section, accompanied by an invitation for citizens to review the

documents and submit any comments or feedback. Prior to disclosure of NTS, SRI published the corridor level assessment and delivered it to all involved municipalities. The corridor level assessment was developed as a high-level assessment of all three sections, and the information provided in the disclosed documentation was used to inform preparation of SEP and SIA, as well as other relevant documents from the disclosure package. All the previously disclosed documentation, in regards to corridor level assessment, is available at the official website of SRI.

4.2. Public presentation of the Draft Spatial Plan for the Special Purpose Area

The Spatial Plan for the Special Purpose Area of the Infrastructure Corridor of the Belgrade–Niš Railway Line (covering Sections 2 and Section 3) was initially developed in 2020 for train speeds of up to 160 km/h. It was adopted by the Government of the Republic of Serbia in September 2020, pursuant to Decision No. 117/2020.

The early public hearing on the Spatial Plan was conducted in March 2020, with the draft document made available to the public from March 9 to April 7, 2020, via the website of the Ministry of Construction, Transport and Infrastructure. The public hearing was also announced through the official websites and notice boards of the relevant local self-government units. During this period, written comments, objections, and suggestions on the planning document could be submitted to both the Ministry and local authorities. Due to the state of emergency caused by the COVID-19 pandemic, the public session of the Commission for Public Review—originally scheduled for April 16, 2020—was postponed to June 1, 2020.

Following the decision to increase maximum train speed to 200 km/h on the Belgrade–Niš section, the Spatial Plan was revised for Section 2 and Section 3. The Draft Amendments to the document titled “Changes and Additions to the Spatial Plan for the Special Purpose Area of the Infrastructure Corridor of the Belgrade–Niš Railway” were prepared based on a government decision (“Official Gazette RS”, No. 62/2022) and made available for public disclosure from March 11 to April 16, 2024. A public session of the Commission for Public Review was held on April 26, 2024, in the city administration building in Jagodina, during which all submitted objections were reviewed, and the planning document developer publicly responded to each of them. A closed session of the Commission, during which positions were taken on each submitted objection, was held on May 20, 2024.

A closed session of the Commission, during which positions were taken on each submitted objection, was held on May 20, 2024. The Report about the performed public insight in the Draft Amendment to the Spatial Plan was published on June 21, 2024.

The Report on the public consultation process regarding the Draft Amendments to the Spatial Plan was published on June 21, 2024, on the MCTI website.

The revised Spatial Plan was subsequently adopted by the National Assembly of the Republic of Serbia on November 20, 2024, and published in the Official Gazette (Decision No. 91/2024, dated November 21, 2024).

Among other things, the Report contains a response to the petition submitted by the citizens of Žabare - settlement in Paraćin, which was not accepted. The reason for rejecting the solution proposed by the residents — the construction of an underpass starting in Šumadijska Street and exiting onto Branko Krsmanović Street — is that it would require the demolition of significant number of family homes and is therefore not feasible.

4.3. Meetings in the project-affected municipalities (for the purpose of preparation of SEP and SIA)

In order to inform the municipalities of the main elements of the Project and collect data on the potential impacts of the Project on residents and businesses, SRI and the PPF9 consultant completed limited stakeholder engagement activities for Section 3, conducting introductory information meetings with representatives four local self-governments (Paraćin, Čičevac, Aleksinac, and Niš) through which the railway alignment will pass. The section below provides a

general overview of the meetings and issues raised, whereby detailed meeting minutes (per each municipality) are provided in Appendix 1 – Meeting minutes from stakeholder engagement for SIA and SEP.

The first meetings were conducted on February 19, 2024, in Čičevac and Paraćin and on February 20, 2024, in Aleksinac and Niš during which basic information about the Project itself was provided. Local authorities were asked to review the potential positive and negative impacts of the Project and to provide their feedback during the second visit.

During the second visit, PPF9 consultants and SRI representatives, with the presence of municipal representatives and local residents visited key locations along the route - Čičevac and Paraćin on March 28, 2024, and Aleksinac, and Niš on March 23, 2024. Residents and municipal representatives raised concern over the planned demolition of family houses and businesses, reduction and relocation of existing railway crossings and increased risk of flooding due to inadequate drainage systems. Also, key issues included displacement, disruption of local economic activities, both agriculture and commercial, and fierce that planned underpasses would be flooded and may become unusable, emphasising the need for improved design, accessibility and flood protection measures.

Following these initial visits, stakeholder engagement process continued in 2025 with additional visits to four local self-governments. These visits were part of the preparation of this SEP and served to support communication with stakeholders and gather important information. The engagement has been consistent and included representatives at both municipal and local community levels. The first series of meetings were focused on identifying and engaging key institutional stakeholders at the local level through organised visits to affected LSGs and discussions **with municipal representatives**, including mayors and heads of local community offices. These visits were conducted during the period 7-9 May 2025, with the aim of collecting initial feedback, gaining insight into the general attitude towards the Project, identifying major concerns related to every stage of its implementation, and laying the groundwork for further stakeholder engagement.

The visit to Aleksinac was conducted on May 7, 2025. Several concerns were raised regarding the planned railway route. Mayor and local officials emphasized the need for direct communication with technical experts to review the proposed alignment and address the impact of closing existing railway crossings. The planned route would divide most settlements in two, significantly affecting daily life, access to services, and mobility, especially with a reduced number of crossings. A particular concern is related to the number of households planned to be demolished, which is the highest along the entire railway route within this municipality. Local representatives conveyed the growing concerns of the families that will be directly affected by these plans. Concerns were also expressed about the disruption of road links to Niš and Kruševac, insufficient pedestrian and agricultural access, and potential issues with ongoing infrastructure projects such as the sewage network under the “Clean Serbia” program. Additionally, relocation of the water supply network due to route adjustments could lead to service interruptions and extra costs related primarily to reconnection of the roads. While the municipality acknowledges the national importance of the project, local communities expressed fear they will experience only the negative impacts without direct local benefits..

The visit to Paraćin was organized on May 8, 2025,.

Local authorities expressed dissatisfaction with communication with the Designer, noting that, apart from the team dealing with hydrology, no other members of the Designer’s team contacted the relevant municipal departments. It was emphasized that the urban planning department should be involved in site visits alongside the Designer to ensure accurate understanding and collaboration, but despite preparing technical solutions, the urban planning team was not contacted during on-site visits. The LSG also reported that it never received the Adopted Spatial Plan from the competent state authorities, limiting its ability to fully engage in the process. During the construction phase, the LSG expects to be actively involved in daily communication with contractors to minimize disruptions to residents’ daily lives. A significant concern was raised by residents of the Žabari settlement, where the planned closure of the

existing level crossing would severely impact daily life by increasing travel times to the town centre and emergency response times, potentially leading to displacement of residents. Furthermore, the proximity of a landfill could lead to increased service costs if the current technical solution remains unchanged. In the Drenovo settlement, the closure of a level crossing may hinder access to agricultural plots, and despite repeated municipal requests, no follow-up discussions with the Designer have taken place. The visit to Čičevac was organized on May 8, 2025,

The same as in Paraćin, local authorities expressed dissatisfaction with communication from the Designer and reported not receiving the adopted spatial plan but also noted that most of its comments were accepted. During construction, the LSG expects active daily communication with contractors to minimize disruptions. The municipality highlighted the importance of consulting the local hunting association due to hunting tourism in the area. Overall, the LSG does not anticipate significant negative impacts on the community if their comments are properly incorporated

The visit to Niš was organized on May 9, 2025,

The City of Niš representatives stated they had no objections to the Project. They also noted that residents, especially those living in directly affected settlements, are not well informed, with only Trupale residents having shown interest—mainly regarding expropriation issues. They recommended organizing on-site visits and public presentations of the design to improve communication. While they do not expect major disruptions during construction, they emphasized the importance of daily coordination with the Contractor to minimize traffic-related impact.

The next round of stakeholder engagement took place between 28 and 30 May 2025, focusing on visits at the level of **local community** offices and direct interaction with residents.. These visits were organized as part of the development of the SEP, during which representatives of local community offices were provided with an overview of the consultation process, with a focus on social and communication aspects. The meetings also served to gather input on potential social impacts of the Project and to ensure that the views, concerns, and expectations of local communities are reflected in future planning.

During these visits, attended by officials from the Municipalities, representatives of SRI, the Technical Consultant to SRI, and Expert Team, an update was provided on the current status and forthcoming phases of the Project, specifically emphasizing that the technical documentation is still being finalized and that the expropriation study is expected to be completed in the future. This clarification was particularly important because many representatives of the local communities initially expected the consultation meetings to focus primarily on technical details and expropriation issues. The meetings also aimed to gather input from local community representatives and residents regarding their views on the Project, including their concerns, expectations, and any other issues affecting the entire community.

These meetings encompassed visits to local community offices across all four municipalities. Representatives from a total of eight local community offices participated in these meetings - two from Nis (May 28, 2025), two from Paraćin (May 28, 2025), and four from the municipality of Aleksinac (May 30, 2025), where a higher number of concerns and challenges were had been identified during the previous visits. The meeting in the municipality of Čičevac (May 29, 2025) was attended by municipal officials, without presence of local community offices and residents. The following summaries provide an overview of each meeting conducted with local community representatives, capturing the nature of the discussions, key themes raised, and the specific social or logistical concerns relevant to each location.

City of Nis – Mezgraja - representatives of the settlement expressed dissatisfaction with the lack of clear information and timelines regarding construction, expropriation, and property demolition, which has delayed their ability to maintain properties or plan relocations. They also raised significant concerns about the proposed technical solution outlined in the spatial plan. During the public consultation phase, on April 17, 2024, they submitted a formal comment requesting modifications to the plan, but this was rejected. Their main request was to maintain vehicle passage at

the location of the existing railway crossing, as the current spatial plan proposes only a pedestrian underpass there, while the vehicle underpass is planned approximately 700 meters away. The community stressed that if this solution is not changed, the village would be divided into two parts, severely disrupting daily life, causing major inconvenience, and potentially leading to depopulation. They also warned that the proposed solution would disrupt bus services, complicate the movement of pupils and agricultural producers, and restrict access for emergency services such as ambulances, police, and firefighters. Additionally, they raised concerns about flooding risks in the area planned for the underpass. The community requested information about the type of access near the local stadium, particularly whether car access will be possible, and emphasized that the local school, an object of cultural significance, must be preserved throughout the project implementation.

City of Nis – Trupale - the key issues raised by the local community included a significant lack of information about the Project, with residents requesting detailed presentations on design, timelines for expropriation, construction phases, and infrastructure such as underpasses and access roads. The community emphasised their need for clear communication to organize local activities effectively. Technically, the community expressed concern that the proposed railway solution would result in loss of access to over 500 hectares of agricultural land during construction, which poses a major challenge given their reliance on farming. Residents near the existing Trupale station highlighted the risk of losing access to other parts of the settlement due to the planned works, fearing inadequate alternative routes. The Trupale railway crossing, frequently used by both locals and emergency services, and emphasised that it must remain operational during construction and future railway operations. Safety concerns were also raised regarding the level crossing barrier which is 40 years old, which frequently malfunctions and jeopardises vehicle and passenger safety. Furthermore, the local population stressed the need for alignment between local spatial planning and railway-related land use regulations, particularly concerning the undefined buffer zone around the railway.

Municipality of Paraćin – Žabare - The local community consider that they are inadequately informed about the project and requested detailed presentations and communication with SRI to understand the expected timelines for expropriation, construction, and other relevant aspects such as the location of underpasses and access roads. A major technical concern raised by the community involves the proposed removal of the railway crossing at Šumadijska Street. The community submitted a petition against this removal, requesting instead a solution that would maintain vehicle passage, controlled by traffic lights, allowing one vehicle at a time. This petition was rejected. The crossing is heavily used by approximately 2,000 people daily, and its removal would force residents to use an alternative route roughly six kilometres long, compared to the current 700 meters. This change would significantly disrupt daily commuting for pupils, workers, and residents, affecting around 300 households and 14 major companies. Some company representatives warned that the increased travel distance might force closures due to reduced accessibility, economic displacement, and loss of land value, as compensation would not suffice to reestablish businesses elsewhere. The community also raised concerns about delayed emergency response times for services such as ambulances and firefighters, as well as operational challenges for local communal services, since the road leads to the main town landfill. They fear the settlement will be divided into two parts: one with only industrial facilities, and the other containing essential community infrastructure such as the school, kindergarten, health unit, store, and park. This division would isolate residents and disrupt the social life of the community, highlighting the urgent need for alternative access routes. Additionally, the community requested that the old textile factory, a local symbol of Paraćin, be preserved and protected throughout project implementation.

Municipality of Paraćin - Drenovac – stated that residents feel inadequately informed about the railway project and have requested a formal presentation of the design, along with direct communication with SRI to clarify timelines for expropriation, construction, and key elements such as the layout of the railway, locations of underpasses, and access roads. Drenovac, the largest village in the municipality with around 2,600 residents including 120 school-aged children, is at risk of being divided in two by the railway. All essential community facilities will be concentrated on one side, leaving the other without services, potentially making the settlement unsustainable. While the community recognises that railway safety would be improved, they believe that this is the only benefit they would receive, while

their overall functionality would be severely affected. Their request to keep the local station was rejected, and they supported the idea proposed by Jagodina residents to relocate the railway alongside the highway. They also proposed that the overpass be moved closer to the village.

Flooding from stormwater runoff is a major concern. The community requested that the railway design include adequate culverts and drainage to protect not only the infrastructure but also the wider area and settlement. Underpasses must also be designed to function safely during floods. They suggested moving the planned station in Sikirica closer to Drenovac, noting that the current station was heavily used, especially by students. Of the two existing railway crossings, one will be closed, and an overpass is planned at the other, located on the village's edge. Due to the planned project, residents have been unable to develop their land, including reclassifying agricultural land for construction use. This will result in financial losses, especially given the significant difference in compensation between agricultural and construction land. Concerns were also raised about health and safety due to proximity to the railway, including potential noise, dust, and vibrations. The community requested clarification about safe distances from the railway line. Cultural and archaeological preservation is another important issue. The area includes a Cultural Centre, a World War I memorial (proposed for protection), and a Neolithic archaeological site used for ongoing research and summer training programs. A new museum is also under construction nearby. These locations are specified by cadastral plot numbers, and the Association for Protection of Cultural Heritage in Paraćin should be consulted to ensure these heritage sites are preserved.

Municipality of Aleksinac – Vitkovac - residents expressed serious concerns about the lack of design presentation. They are especially worried about physical displacement, as many houses are expected to be demolished, yet they have no clear information on the scope of expropriation. The local population, including a significant number of elderly people, is unprepared for resettlement and in need of assistance. Key technical concerns include the need for reliable connections between both sides of the railway during both construction and operation phase of the Project, uncertainty about the buffer zone preventing future development, and the height of protective barriers, which may lead to shadowing of properties and hinder the use of solar panels. Flooding is also a major issue, especially in underpass next to school in Donji Ljubeš. Also, Gornji Ljubeš has issues with flooding, due to high groundwater levels and poor drainage maintenance. Residents are requesting clear plans for access and connecting roads, relocation of infrastructure, and preservation of daily economic activities, especially for those commuting to Niš by train. Local authorities are concerned that the division of the town and reduced accessibility could lead to depopulation, particularly among young people.

Municipality of Aleksinac – Trnjane – residents have expressed dissatisfaction with the lack of public presentation of the design and insufficient information on the scope of expropriation. According to the adopted spatial plan, a curve passing through the settlement must be straightened to accommodate higher speeds, which will result in the demolition of a significant number of houses. This has created anxiety among residents, who appear unprepared for the project's implementation and have expressed the need for additional meetings to receive more detailed information on the design and expropriation process. They also expect more transparent and ongoing communication. A major concern across all settlements is the issue of physical displacement, especially given the high number of elderly residents in the affected areas. These individuals are particularly vulnerable, as many have no alternative housing options and will require support during the resettlement process. There is also concern over the way the railway will divide Aleksinac into two parts, creating accessibility issues and risking the outmigration of residents. The settlement of Trnjane raised strong objections, stating that the proposed route would cut the community in half, isolate approximately 500 households, and eliminate direct access to community services. The removal of a road-level crossing will force residents to travel an additional four kilometres to reach the other side of the village, creating challenges for everyday life, including school access, emergency services, and mobility for the elderly and children. In Korman, residents are worried about the removal of one of the two existing railway crossings and are requesting that an underpass be constructed at the same location to maintain connectivity. Technically, communities are concerned about the lack of clear solutions for connecting both sides of the railway during and after



construction. They are also unsure about the width of the buffer zone, which limits future construction and planning. In Trnjane, some households are expected to lose all their property, and residents are seeking concrete information on what support and options will be available. An additional issue involves an old rural water supply system, built in 1965 with permits issued by SRI, which still serves Trnjane and nearby areas. It is essential for this system to be preserved, including its catchments, as it remains a critical water source. The community is also worried about the planned demolition of part of the school in Korman and the removal of playgrounds in both Korman and Trnjane, including a newly built one. They stress that if these facilities are removed, replacements must be provided. They also emphasize the importance of constructing access roads and relocating existing infrastructure to minimize disruption. Public transport concerns were also raised, as the elimination of railway stops in the settlements will make it difficult for residents—particularly those without cars—to reach medical facilities or other essential services. Residents also seek clarity on groundwater management and flood protection, especially around the underpasses, due to a history of flooding in the area. Economically, the project threatens the daily life of many people from Aleksinac who commute to Niš by train. Any additional financial or logistical burden could be harmful, given the modest economic conditions of the local population. The local authorities are worried about long-term demographic and economic impacts, fearing that young people and families may leave the municipality if the railway cuts them off from essential services and reduces their quality of life.

Municipality of Aleksinac – Žitkovac and Prčilovica – residents expressed dissatisfaction with the planned Project, particularly the lack of public presentation of the design and insufficient information on the scope of expropriation. One of their main concerns is the issue of physical displacement, especially of the elderly who may not have the means or support to manage resettlement on their own. Given the significant scale of potential resettlement, they insist on timely and detailed consultations about the design and planning of resettlement activities. The community is also requesting the relocation of the railway route outside the settlement in order to avoid widespread expropriation and to address safety concerns. They demand additional railway crossings, especially in Prčilovica, where the current layout could hinder children's access to school. The underpass in Žitkovac is seen as crucial for daily life and should be preserved and upgraded to ensure accessibility for persons with disabilities. In Moravac, the presence of a vital water supply system near the planned overpass must be safeguarded. Safety concerns are significant, particularly for children, as schools are located close to the railway. Residents demand strict protective measures in school zones and clear emergency response procedures, especially due to the anticipated increase in train speeds. They also fear that the physical division of settlements will negatively impact local businesses and push residents to leave Aleksinac, affecting the town's demographic and economic stability. The communities also raised issues regarding limitations on property investments due to pending permits associated with the project. They request dedicated consultations for affected property owners and a clear, phase-based communication strategy from SRI, as they have been waiting for updates for several years and now feel overlooked. Additionally, concerns were raised that the current railway layout was developed using outdated data, with some properties not accurately reflected in the design. The preservation of culturally significant structures, such as the Water Tower in Žitkovac, is also a priority for the community.

The proposed communication framework for all four municipalities relies on formal channels coordinated primarily through local government structures. In each case, the respective municipality is designated as the first point of contact. These municipal authorities will then distribute project-related information to Local Community Offices and their representatives, who will be responsible for keeping the public informed. SRI is expected to ensure timely and transparent communication by providing local authorities with clear updates on the project timeline, technical design, expropriation procedures, and other relevant matters. These updates should precede each project phase and be followed by public meetings to present information and collect community feedback. Communication will be carried out through a combination of official methods, including municipal newspapers, websites, social media platforms (e.g., Facebook and Viber groups), and printed informational materials such as fliers. The aim is to ensure broad public awareness and meaningful engagement so that residents can prepare for upcoming changes and voice their concerns effectively.



In conclusion, while each community expressed its own specific challenges in relation to the Project (detailed comprehensively for each community in Appendix 1), several key concerns, objections, and suggestions were consistently shared across all locations:

- Expropriation and physical displacement of households with concerns expressed over the lack of timely and transparent information regarding the scope, procedures, and compensation related to expropriation (residents of all visited settlements in Aleksinac, Niš and Paraćin).
- Removal or relocation of railway crossings, with concerns about longer travel distances, disruption to daily commutes, and limited access to schools, emergency services, shops, workplaces, and agricultural land, was most notably raised in settlements in Paraćin (Žabare and Drenovac), Aleksinac (Trnjane and Korman) and Nis (Mezgraja).
- Concerns over the removal or relocation of railway stations and stops, was raised in the settlements in Paraćin (Drenovac) and Aleksinac (Trnjane and Korman)
- Concerns over dividing the communities into two parts were most notably expressed among residents of Paraćin (Žabare and Drenovac), Aleksinac (Trnjane, Vitkovac, Žitkovac) and Nis (Mezgraja).
- Concerns were expressed regarding flood risks in low-lying areas near underpasses, highlighting the lack of adequate drainage systems.
- Objections were raised across all visited communities over the lack of information concerning the technical solution and design of the railway.
- Residents of all visited local communities suggested that the SRI organise on-site visits to their settlements and provide detailed public presentations of the planned railway route to improve awareness and address their concerns.
- Residents of most visited local communities suggested relocation of the planned route outside of the settlements, both due to avoidance of expropriation and due to safety concerns.

5. INFORMATION DISCLOSURE AND STAKEHOLDER ENGAGEMENT PROGRAM

5.1 Disclosure strategy

The main objectives of stakeholder engagement activities are to inform, disclose, and consult on various project documents and activities at an early stage in order to establish a dialogue with relevant stakeholders from the project planning phase through to implementation and operation.

Timely disclosure of relevant project information enables stakeholders to understand the risks, impacts, and opportunities associated with the project. Document disclosure also ensures that all parties are informed about the project's plans, activities, phases, and processes, giving them the opportunity to provide comments and feedback.

SRI and Lenders will publicly disclose the following Project-related environmental and social document package (Disclosure package), once it is adopted.:

- This Stakeholder Engagement Plan (SEP) and Public Grievance Form (Annex 1);
- Environmental and Social Impact Assessment (ESIA), including the Environmental and Social Management Plan (ESMP);
- Non-Technical Summary (NTS) of the ESIA;
- Resettlement Policy Framework (RPF);
- Resettlement Action Plan (RAP);
- Biodiversity Management Plan;
- Appropriate Assessment;
- Environmental and Social Action Plan (ESAP).

This Disclosure package will be publicly available in both Serbian language and English languages through the following websites:

- Ministry of Construction, Transport and Infrastructure (MCTI): <http://www.mgsi.gov.rs/>
- SRI: <https://infrazs.rs/>
- EIB: www.eib.org
- EBRD: www.ebrd.org
- Municipality of Paraćin: <https://www.paracin.rs>
- Municipality of Čičevac: <https://www.cicevac.rs>
- City of Kruševac: <https://krusevac.ls.gov.rs/>
- Municipality of Aleksinac: <http://www.aleksinac.org>
- City of Niš: <https://www.ni.rs>

The documents will remain disclosed on these websites for a minimum of 120 calendar days in line with Lenders' requirements and will remain publicly available throughout the life of the Project.

Announcements about the availability of the Disclosure Package will be posted on:



- notice boards (and other frequently visited places) and websites of all affected local self-governments (Paraćin, Čičevac, Kruševac, Aleksinac, and Niš);
- notice boards and frequently visited places in all affected settlements/local communities (Settlements in the municipality of Paraćin: Vrapčane, 11. Kongres, Striža, Ratare, Sikirica, Drenovac; Settlements in the municipality of Čičevac: Pojate, Lučina; Settlements in the municipality of Aleksinac: Vitkovac, Donji Ljubeš, Srezovac, Korman, Trnjane, Donji Adrovac, Prčilovica, Žitkovac, Moravac, Nozrina, Lužane, Tešica, Grejač, Veliki Drenovac; Settlements in the City of Niš: Mezgraja, Trupale, settlements in the City of Kruševac);
- all railway stations/stops currently operating as official stations/stops.

Printed copies of the entire Disclosure package (in Serbian) will be available at the premises of SRI and all LSGs involved in the Project at least 15 days before the public consultations, as well as during the public consultations.

Relevant OIPs(as detailed in see Table 4)) will be notified that the documents have been disclosed, where and how they can access them, and how they can submit comments, questions, and suggestions to SRI.

Additionally, the entire Disclosure package will be published electronically (in English and Serbian language) and will remain open for comments from stakeholders on the following websites:

- Ministry of Construction, Transport and Infrastructure (MCTI): <http://www.mgsi.gov.rs/>
- SRI: <https://infrazs.rs>
- EIB: www.eib.org
- EBRD: www.ebrd.org
- Municipality of Paraćin: <https://www.paracin.rs>
- Municipality of Čičevac: <https://www.cicevac.rs>
- City of Kruševac: <https://krusevac.ls.gov.rs>
- Municipality of Aleksinac: <http://www.aleksinac.org>
- City of Niš: <https://www.nis.rs>

After they are finalised, the entire Disclosure package will be published on the SRI website and all the LSGs' websites involved in the Project and will remain available until the official completion of the Project.

Information regarding the Project will be announced through radio, television, print and electronic media, as well as on the SRI website.

During Project implementation, all previously published documents, if updated, will be re-published in the same manner as the previous versions, and public consultations will be organized accordingly.

Contractors' documents related to the management of environmental and social risks (e.g., Traffic Management Plan, Emergency Response Plans, Codes of Conduct for employees and contracted workers, etc.) will be published on the contractors' websites. These documents will be published for information only, as they are not subject to public consultation. Information about the publication of these documents will be disclosed using the same methods as those applied for this SEP.

SRI will publish information about the timing of Project activities and related updates in various media, newspapers, and on the radio at least 15 days before the start of planned activities or public consultations.

Finally, it is important to note that all municipalities have other means for disclosure of information and posting announcements. These communication channels were discussed during the stakeholder engagement process, after which official requests for information were sent to each municipality. However, at the time of preparation of this SEP, Municipality Čičevac and City of Nis are the only LSG which provided the requested information, which



is presented in the table below. These communication channels shall be used by the local municipalities for dissemination of official project-related announcements. Communication channels which are available in other municipalities will be added to this section of SEP once information is provided by the municipalities.

Table 6: Available means for communication on local level

Municipality	Official contact point in Municipality	Official contact point in Local Community Offices	Public online portals and social networks
Ćiće vac	Jovica Bogdanović – main contact point at Municipality Ćiće vac Position: Chief of the Department for urban Planning, Construction and Inspection Affairs Email: jovica.bogdanovic@cicevac.ls.gov.rs Office email: kabinet@cicevac.ls.gov.rs Phone: 064/877-49-06 Office phone: 037/811-260	LCO Lučine – Borko Živković, President of the LCO Email: borkozivkovic2@gmail.com Phone: 064/117-32-44	Official Municipality website: www.cicevac.rs
	Municipality Ćiće vac, Office for cooperation/communication with local communities/local population Email: predsednik.skupstine@cicevac.ls.gov.rs Phone: 037/811-260	LCO Ćiće vac – Violeta Živadinović Rakić, President of the LCO Email: violeta.cicevac@gmail.com Phone: 062/872-55-46 LCO Pojate – Mira Arandjelović, President of the LCO Email: mira.arandjelovic1972@gmail.com Phone: 064/665-80-93	Local online portals and social media: “Ćiće vac Info”: https://www.facebook.com/p/%C4%86i%C4%87evac-Info-100068914412804 “Opština Ćiće vac”: https://www.facebook.com/p/Op%C5%A1tina-%C4%86i%C4%87evac-100063592057838
Kruševac	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP
Paraćin	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP
Aleksinac	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP	Missing information at the time of preparation of SEP
Niš	Prof. Miroslav Milutinović - main contact point at Municipality Crveni Krst Position: Municipality President Email: dr.mmilutinovic@gmail.com Phone: 065/833-00-01	LCO Mezgraja – Bratislav, President of the LCO Phone: 060/460-16-86 LCO Trupale – Slobodan Jovanović, President of the LCO Phone: 063/3105-989	Some of the public media portals via which announcements are conveyed: www.tvzonaplus.rs ; www.belami.rs ; www.narodne.com ; www.glasijuga.rs ; www.niskevesti.rs .



5.2 Planned consultation activities and methods

Locations of all meetings will take into account the needs of vulnerable households who travel options may be limited, such as in LCO offices in the Project area. Meetings will also be organised to take into account times accommodating the needs of women and agricultural workers.

1) Meetings planned during the ESIA stage (including RAP disclosure)

SRI, with the support of the Expert team, will schedule and hold at least five public consultation meetings during September 2025, one in each of the aforementioned LSGs, after the disclosure of the documents listed above.

In addition to these, SRI will hold separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (in the premises of relevant Local Community Offices).

Additionally, the meetings planned during the preparation of this SEP, will be conducted during this phase. For this purpose, SRI will organize separate meetings with the identified stakeholders.

SRI, with the support of the Designer/Technical Team and in coordination with the Ministry of Construction, Transport and Infrastructure, will organize additional meetings in all affected local communities to familiarize them with the proposed technical solutions and with the Project's technical aspects in general. These meetings will be held within the first 60 days of the disclosure phase, giving SRI sufficient time to review and, where possible, address any concerns the local community may have regarding the proposed technical solutions before the end of that phase. These meetings shall be held prior to commencement of the negotiations related to expropriation, as well as prior to any activities related to development of RAP. Based on all the aforementioned, the table below presents the schedule of the planned stakeholder engagement activities.

Table 7: Preliminary Schedule for Technical Meetings

Activity	Stakeholders	Information/Materials/ Communication Method	Timeframe/ Frequency	Responsibility	Expected attendees	Location
Communication with affected local municipalities	Municipalities, Local residents and businesses	Technical face-to-face meetings <ul style="list-style-type: none"> Familiarize affected communities with the proposed technical solutions - Detailed layout of the railway (alignment, underpasses, overpasses, crossings) 	During the first 60 days of disclosure period.	SRI	<ul style="list-style-type: none"> Head of the SRI Legal Team / senior members SRI PIU – head/senior members 	Locations to be confirmed in coordination with municipality representatives.
	Ćićevac (Pojate / Lučane)	<ul style="list-style-type: none"> Locations and technical specifications of pedestrian and vehicle crossings Planned road closures and detours 	25th of August 2025 (Tentative - TBD)	SRI	<ul style="list-style-type: none"> SRI E&S Team 	Local Community Center (Tentative - TBD)
	Paraćin (MZ Žabare / Drenovac)	<ul style="list-style-type: none"> Drainage system design (culverts, soak pits, embankments) 	26th of August 2025 (Tentative - TBD)	SRI	<ul style="list-style-type: none"> PPF9 – Design Team 	Local Community Center (Tentative - TBD)



Activity	Stakeholders	Information/Materials/ Communication Method	Timeframe/ Frequency	Responsibility	Expected attendees	Location
	Aleksinac (MZ Vitkovac / Trnjane / Prčilovica / Žitkovac)	<ul style="list-style-type: none"> Safety at crossings with increased train speeds Construction phases and overall timeline Loss of railway stops/stations and local public transport implications Overview of the affected area planned to be expropriated Timeline for expropriation and related legal procedures Timeline / Framework for sharing updates (design finalization, expropriation, construction) 	27th of August 2025 (Tentative - TBD)	SRI	• PPF9 E&S Team	Local Community Center (Tentative - TBD)
	Kruševac		28th of August 2025 (Tentative - TBD)	SRI		Local Community Center (Tentative - TBD)
	Niš (MZ Mezgraja and Trupale)		29th of August 2025 (Tentative - TBD)	SRI		Local Community Center (Tentative - TBD)

The implementation of the project requires land acquisition. To ensure that all physical and economic displacement caused by the project is addressed in accordance with national legislation as well as EBRD/EIB standards and requirements, the RPF has been developed and is an integral part of the Disclosure Package. The RPF was prepared based on the Preliminary Design.

However, the expropriation procedure has not yet been initiated. As part of the expropriation process, it will be necessary to prepare a RAP in accordance with the RPF. After the preparation and approval of the Main Design, the Expropriation Elaborate will be prepared, followed by the adoption of the Decision on Public Interest. These documents will serve as the basis for initiating the preparation of the RAP.

During the preparation of the RAP, SRI will organize meetings with affected persons to present the document and address all questions and concerns, all in accordance with the methodology and timeline detailed in the RPF. It is estimated that the expropriation process will begin at the end of 2025 or the beginning of 2026. Following this, SRI will start organising meetings with land acquisition-affected persons in the first quarter of 2026.

SRI will inform all stakeholders about the exact date, time, and venue where the meetings will be held, at least 15 days in advance, through the following channels:

- the official website of SRI;
- notice boards (and other frequently visited places) and websites of all affected local self-governments (Paraćin, Čičevac, Aleksinac, Kruševac, and Niš);
- notice boards and frequently visited places in all affected settlements/local communities (Settlements in the municipality of Paraćin: Vrapčane, 11. Kongres, Striža, Ratare, Sikirica, Drenovac; Settlements in the municipality of Čičevac: Pojate, Lučina; Settlements in the municipality of Aleksinac: Vitkovac, Donji Ljubeš, Srezovac, Korman, Trnjane, Donji Adrovac, Prčilovica, Žitkovac, Moravac, Nozrina, Lužane,



Tešica, Grejač, Veliki Drenovac; Settlements in the City of Niš: Mezgraja, Trupale; Settlements in the City of Kruševac);

- local radio, television, print and electronic media;
- all railway stations/stops currently operating as official stations.

All available Project information and documents will be disclosed to the public at least 15 days in advance of the meetings.

At the meetings, SRI will present the project footprint, the expected impacts and planned mitigation measures, as well as receive feedback on the disclosure package from stakeholders.

Participants will be able to present their opinions and remarks with regard to the Project, as well as suggest possible solutions to the issues raised. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals, within 15 days of each meeting.

In addition, individual stakeholder consultation meetings may be organized as needed.

2) Meetings planned during the construction phase:

- During construction works, the SRI will hold at least one public consultation meeting (and others if needed) in each affected LSG (Paraćin, Čičevac, Aleksinac, Kruševac and Niš) to present Project progress and gather feedback on the impacts of construction activities. If necessary, the SRI will organize additional meetings in local community offices where the need for such engagement arises, based on stakeholder requests, grievances received, or observations made during monitoring and site. The meetings will be attended by the representatives of the Contractor and the Supervising Engineer.

Note: These meetings will be announced and arranged in the same manner as foreseen for the meetings planned during the ESIA stage. All comments and proposals will be documented and appropriately addressed. The PIU will publish a summary report of all relevant issues raised, including explanations for inclusion or exclusion of proposals.

3) Meetings planned during the post-construction/operation phase

SRI will maintain communication with the relevant stakeholder even after completion of construction, so as to ensure that all the relevant aspects and potential operational issues are duly communicated. To this end, SRI will engage with the following stakeholders, as defined below in the Stakeholder Engagement Programme: OIPs (Governmental bodies, Affected Municipalities, Local community, Media, NGOs, Academic institutions), Affected PAPs, Interested and participating OIPs.

5.3 Proposed Strategy of engagement with vulnerable groups

Specific attention will be paid to vulnerable groups to ensure that their views are also heard, recorded and taken into account in Project planning and implementation.

Vulnerable individuals or households (listed above) are more likely to be excluded from or unable to participate fully in the mainstream consultation process and, as such, may require specific measures and/or assistance to do so. Therefore, consultation activities for this Project will be based on the principle of engaging all segments of the local society, including vulnerable individuals.

Some of the strategies that will be adopted to effectively engage with vulnerable groups and individuals will be:

1. Ensuring that information about all planned public meetings is available not only on the websites of SRI and five LSGs but also, but also in notice boards and frequently visited places in all affected settlements/local communities



2. Using adequate communication channels tailored to the needs of vulnerable groups (e.g., TV/radio for the elderly or distanced communities) – including ensuring that information about the publication of the disclosure package is publicized through local media.
3. Accommodating the needs of women by organising meetings and public consultations at times suitable for women (given that women in the Republic of Serbia tend to be responsible for the majority of domestic duties such as childrearing, cooking and cleaning).
4. Holding separate small group discussions with vulnerable groups/their representatives at locations that enable easier access to those whose travel options may be limited (in the premises of relevant LCOs).
5. Separate discussions will be organized with members of the Roma community or their representatives, in a language they understand (in Romani if necessary), and at locations close to their places of residence or otherwise easily accessible to them.

These strategies are incorporated into the specific communication requirements in this SEP.



Table 8: Proposed Strategy of Consultation

Target stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
Project phase - ESIA					
<p>PAPs:</p> <ul style="list-style-type: none">▪ Directly and indirectly Affected people and entities, communities▪ Passengers (local travellers)	<ul style="list-style-type: none">▪ Households affected by physical displacement, including employees of SRI as tenants;▪ Households affected by economic displacement;▪ Businesses and employees affected by physical displacement, including farmers;▪ Businesses and employees affected by economic displacement, including farmers;▪ Local communities and persons residing in areas where the Project specific works will be executed and which are affected by loss of infrastructure access, limitation of utilities, public services, halt/station closure, noise, dust, damage, emissions, vibrations etc.;▪ Vulnerable groups, households and individuals;▪ Municipalities affected by the Project and the relevant departments;▪ Businesses in the project area whose land and/or facilities are not subject to economic and/or physical displacement;▪ Passengers including daily commuters (students, high	<ul style="list-style-type: none">▪ Project design and Spatial Plan for the Project Area▪ Project development, responsibilities and timelines▪ E&S documents, procedures and entitlements▪ ESIA and RPF disclosure▪ Land and structures acquisition principles, procedures and mitigation measures▪ Resettlement and livelihood restoration options▪ Environmental and Social risks (other than resettlement) and mitigation measures▪ Community Health and Safety▪ Traffic impacts and solutions▪ Vulnerability and women rights▪ Grievance mechanism and other communication channels▪ Project benefits including labour	<ul style="list-style-type: none">▪ Public consultations and meetings with interested people and groups in affected municipalities▪▪ Focus meetings with vulnerable groups▪ Interviews with all people affected by land acquisition through the socio-economic survey during RAP development▪ Publication of relevant documents and press releases▪ Press releases▪ Grievance mechanism	2025/2026	<ul style="list-style-type: none">▪ Expert Team▪ SRI PIU with support of SRI▪ Legal Team, SRI Media Centre and SRI Rail Traffic Expert



Target stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
	school students, persons employed in nearby cities), railway transport operators and tourists.	opportunities for job seekers			
<ul style="list-style-type: none"> Railway Sector agencies Transport operators 	<ul style="list-style-type: none"> Srbija Cargo Srbijavoz Private transport operators 	<ul style="list-style-type: none"> Project design Project timelines and responsibilities Traffic management plan 	<ul style="list-style-type: none"> Monthly meetings with Srbija Cargo, Srbijavoz and private transport operators. Telephone, e-mail and written communications Online publications and press releases Grievance mechanism 	Throughout project development and implementation	<ul style="list-style-type: none"> Expert Team SRI PIU and SRI Rail Traffic Expert
OIPs: <ul style="list-style-type: none"> Local Public services/public utility companies Local emergency services Relevant national institutions Relevant local institutions NGOs 	<ul style="list-style-type: none"> MCTI Ministry of Finance Ministry of European Integration Ministry of Internal Affairs Ministry of Environmental Protection National Communities Institute for the Protection of Cultural Monuments of Serbia and Cultural heritage protection Institutes and agencies, at the national and local levels Public Enterprise (PE) Roads of Serbia Public Water Company (PWC) Srbijavode Institute of Archaeology, Belgrade National Council of the Roma National Minority of the Republic of Serbia (Roma Association in Čuprija – Romi 	<ul style="list-style-type: none"> Project design, budgeting, development, timelines and responsibilities E&S documents, procedures and plans Land and structures acquisition principles, procedures and mitigation measures Environmental and Social risks (other than resettlement) and concrete mitigation measures ESIA and RAP disclosure Community Health and Safety Traffic management plan Potential Labour influx stemming from construction works Impacts to cultural 	<ul style="list-style-type: none"> Public consultations in affected municipalities Meetings and documentation exchange Telephone, and written communication to announce stakeholder engagement activities and provide reports Publication of relevant documents and press releases 	2025/2026	<ul style="list-style-type: none"> Expert Team SRI PIU with support of SRI Legal Team, SRI Media Centre and SRI Rail Traffic Expert



Target stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
	<ul style="list-style-type: none"> sa Morave). Hunting Association of Serbia Museum of Natural History Faculty of Biology University of Belgrade Faculty of Mining and Geology University of Belgrade Faculty of Transport and Traffic Engineering University of Belgrade EIB EBRD 	<ul style="list-style-type: none"> heritage Impact to vulnerable groups 			
<ul style="list-style-type: none"> Media 	<ul style="list-style-type: none"> National and local media (radio, TV, newspaper) 	<ul style="list-style-type: none"> Project milestones 	<ul style="list-style-type: none"> Press releases 	<ul style="list-style-type: none"> As needed 	<ul style="list-style-type: none"> SRI PIU and SRI
CONSTRUCTION PHASE					
PAPs: <ul style="list-style-type: none"> Directly and indirectly affected People Communities 	<ul style="list-style-type: none"> Persons affected by physical displacement, including employees of SRI as tenants; Persons affected by economic displacement; Businesses and employees affected by physical displacement, including farmers; Businesses and employees affected by economic displacement, including farmers; Local communities and persons residing in areas where the Project specific works will be executed and which are affected by loss of infrastructure access, limitation of utilities, public services, halt closure, 	<ul style="list-style-type: none"> Maintain awareness of environmental and safety practices in the local communities, especially emergency preparedness and response Monitor community attitudes towards the Project Emergency preparedness and response Duration of civil works Environmental and Social risks (other than resettlement: labour and working, OHS, safety and security) and mitigation 	<ul style="list-style-type: none"> SRI/Contractor(s) on-site communication officer(s) SRI CLO communication activities Online publications and press releases Grievance mechanism Monitoring reports 	<ul style="list-style-type: none"> During construction period in all affected municipalities and in SRI headquarters 	<ul style="list-style-type: none"> SRI PIU Supervision consultants Contractors and sub-contractors



Target stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
	<p>noise, dust, damage, emissions, vibrations etc.;</p> <ul style="list-style-type: none"> Presidents of Local Community Offices; Vulnerable groups, households and individuals; Municipalities affected by the Project and the relevant departments; Businesses in the project area whose land and/or objects are not subject to economic and/or physical displacement; Passengers including daily commuters (students, high school students, persons employed in nearby cities) and tourists. 	<p>measures</p> <ul style="list-style-type: none"> Project development, coordination of responsibilities with the engaged contractor(s) and timelines 			
<ul style="list-style-type: none"> Passengers Transport operators 	<ul style="list-style-type: none"> Local passengers, tourists, Srbija Cargo Srbijavoz Private transport operators 	<ul style="list-style-type: none"> Traffic management plan including signage 	<ul style="list-style-type: none"> SRI/Constructor on-site communication officer SRI CLO communication activities Disclosure of written information such as posters Online publications and press releases Grievance mechanism 	<ul style="list-style-type: none"> During construction period as needed in all affected municipalities and in SRI headquarters 	<ul style="list-style-type: none"> SRI PIU Supervision consultants Contractor and sub-contractors
<ul style="list-style-type: none"> OIPs 	<ul style="list-style-type: none"> Governmental bodies, Affected Municipalities, Local community, Media, NGOs, Academic institutions 	<ul style="list-style-type: none"> Coordination of activities and responsibilities Environmental and social concerns Health and safety impacts Employment opportunities Inspection activities 	<ul style="list-style-type: none"> Meetings SRI/Constructor on-site communication officer Telephone, e-mail and written information exchange (such as flyers) Online publications and press releases Grievance mechanism (GM) reports Monitoring reports 	<ul style="list-style-type: none"> During construction /operation phase as needed in all affected municipalities and in SRI headquarters 	<ul style="list-style-type: none"> SRI PIU



Target stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
POST-CONSTRUCTION/OPERATION PHASE					
Target Stakeholders		Main topics of engagement	Engagement methods used	Timeframe	Responsible Unit
OIPs	<ul style="list-style-type: none"> Governmental bodies, Affected Municipalities, Local community, Media, NGOs, Academic institutions 	<ul style="list-style-type: none"> Coordination of activities and responsibilities Environmental and social concerns Health and safety impacts Employment opportunities Inspection activities 	<ul style="list-style-type: none"> Meetings SRI/Constructor on-site communication officer Telephone, e-mail and written information exchange (such as flyers) Online publications and press releases Grievance mechanism (GM) reports Monitoring reports 	<ul style="list-style-type: none"> During postconstruction /operation phase as needed in all affected municipalities and in SRI headquarters 	<ul style="list-style-type: none"> SRI PIU
		<ul style="list-style-type: none"> OESMP – operation phase E&S management plan (development and implementation) Completion reports and monitoring General Operational Safety Derailments Railway staff risks Transport of dangerous goods Pedestrian Safety Infrastructure Maintenance 	<ul style="list-style-type: none"> Meetings and other appropriate forms of communication Audits and investigations Trainings and education Grievance mechanism 	<ul style="list-style-type: none"> As needed 	<ul style="list-style-type: none"> SRI safety and maintenance departments SRI PIU SRI Media Centre

6. RESPONSIBILITIES FOR IMPLEMENTING THE STAKEHOLDER ENGAGEMENT PROGRAMME

SRI will be responsible for:

- Further planning and implementation of stakeholder engagement activities prescribed by this SEP, as well as other needed information exchange, disclosure and consultation activities;
- Grievance mechanism functioning;
- Allocating sufficient human and budgetary resources to the planned activities.

The following table prescribes the main management functions during stakeholder engagement process.

Table 9: Stakeholder engagement management functions and responsibilities

Actor	Stakeholder engagement responsibilities
SRI PIU	<ol style="list-style-type: none"> 1. Grievance mechanism implementation, including maintaining the Grievance Registry Log 2. Appointing SRI Community Liaison Officers 3. Documents disclosure and preparation of content for SRI webpage 4. Preparing reports for EBRD, EIB and stakeholders 5. Securing that sufficient resources have been allocated to the planned activities through communication with the SRI General Director 6. Building relationships with the affected municipalities and other public entities relevant to the Project 7. Monitoring, evaluation, updating SEP, and reporting in relation to SEP implementation
SRI Community Liaison Officers (SRI CLOs)	<ol style="list-style-type: none"> 1. Responsible for communication with local population and affected municipalities' representatives 2. Support GM functioning in accordance with SRI PIU instructions
SRI Media Centre	<ol style="list-style-type: none"> 1. Project promotion activities 2. Engaging with media and other relevant public stakeholders concerning their communication activities relevant to the Project
Affected Municipalities	<ol style="list-style-type: none"> 1. Support SRI activities related to organization of public consultations, GM functioning and disclosure of the ESIA documents 2. Receive any issue that may result in heightened concern and provide an early warning to the SRI PIU 3. Municipalities to place grievance boxes in their municipal offices.
Expert Team	<ol style="list-style-type: none"> 1. Implementing the planned consultation and information exchange activities prescribed by this SEP during the development of ESIA and accompanying plans and surveys (until the adoption of RAP) 2. Maintain the Stakeholder Engagement Log until the adoption of RAP 3. Preparation of posters for GM, public consultations and migrants' safety information

The material resources mobilised by SRI will be:

- A section of the SRI website dedicated to the Project;
- A Grievance Registry Log and a Stakeholder Engagement Log (preferably both electronic);
- Other material resources such as printed documents that will be used (documents, posters etc.), based on the Project needs.



To ensure successful SEP implementation, the Project will rely on the SRI's existing departments, information sharing avenues and procedures. If needed, the SRI will mobilize additional human and material resources to implement the SEP and manage the Grievance Mechanism.

Having in mind that this Project is expected to involve various (sub)contractors, the SRI will ensure the following through procurement documentation and agreements with (sub)contractors:

- Good relations between engaged (sub)contractors and stakeholders, especially affected municipalities and local population;
- Compliance of engaged (sub)contractors with the standards and obligations prescribed by this SEP;
- That the staff of the (sub)contractor are organized, trained and experienced in carrying out the required stakeholder engagement standards and obligations;
- Monitoring of (sub)contractors' activities related to stakeholder engagement.

7. GRIEVANCE MECHANISM

Grievance Mechanism (GM) has been developed in the manner which ensures that the grievance management process is organised and handled in a culturally appropriate manner in the sense that it ensures discretion, objectivity, sensitivity, responsiveness and equal access to the mechanism to all project stakeholders.

Thereby, this section of SEP presents all the relevant information about establishment, management, availability, means of access to grievance mechanism, communication and disclosure of information of relevance for proper implementation of Grievance Mechanism. In addition to responsibilities for management and implementation of GM, the document contains contact information, as well as details about GM procedures and decision-making processes, and the grievance form (Annex 1). Finally, SEP contains information about the timeframe, which is applicable to GM management, i.e. details about confirmation of receipt of grievance, the expected timeframe for responding to grievances, along with details about disclosure of information pertaining to GM and dissemination of information among the interested parties, i.e. project stakeholders.

7.1 GM Overview

SRI will be in charge of managing the GM process by disseminating information about the GM process to the local self-government offices in the project area and administrating the GM process. This means that SRI will be responsible for receiving and managing grievances, including providing responses to the interested parties (confirming receipt of grievances, providing responses to grievances, logging grievances in the grievance register, and reporting to EBRD and EIB in regard to grievances).

The main role in the SRI PIU is assumed by its Manager, the SRI Environmental and Social Impact Manager and SRI Environmental Expert (together: SRI E&S Experts) supported by the administrative staff. The GM will be used as a direct channel of communication with the project stakeholders, i.e. all interested parties, whereby GM is going to be operational throughout all project phases (including pre-construction, construction and operation). The GM is going to be managed by E&S Project Impact Manager. The main purpose of GM is related to handling stakeholder concerns, comments, questions, proposals or grievances. Aspects that can be covered as part of GM may relate to:

- Actual damage, injuries or losses (or perceived damage);
- Unwelcome incidents including inappropriate behaviour of Project-related personnel;
- Project implementation that deviates from official plan;
- General concerns or comments relating to the Project.

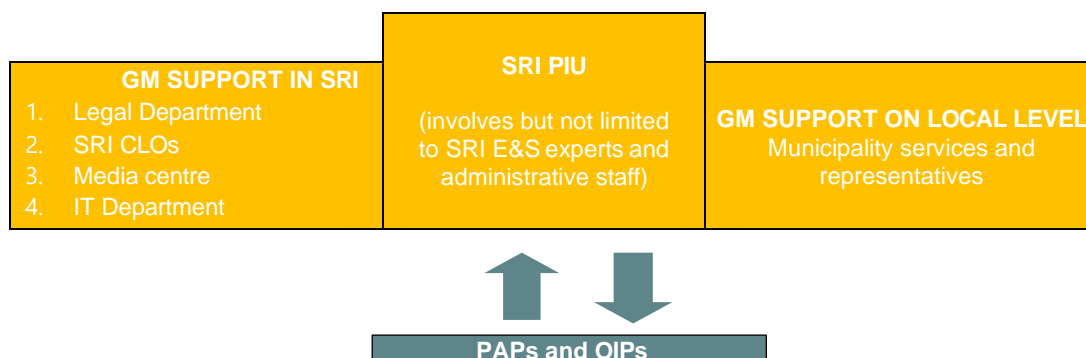


Figure 4: Indicative GM organisation

Information about the GM availability will be available at:

- SRI's and all affected LSG websites;
- Bulletin boards (at frequently visited places) of all affected local municipalities;
- At all railway stations/halts currently serving as official stations/stops.

The SRI will cooperate with local governments in joint efforts to establishing functioning GM and informing stakeholders about the GM role and function, contact persons, admission channels and the procedures to submit a grievance. The SRI will organize its Community Liaison Officers (CLOs) to cover wider areas of several settlements and/or municipalities and support the SRI PIU in two-way communication with the local officials and population.

7.2 Grievance procedure and administration

Any grievance can be brought to the attention of SRI via a grievance box, telephone, mail, e-mail, SRI CLOs, or affected municipality. Grievance boxes shall be placed at each local Municipality Office, whereby the grievance boxes will be available at the Municipality Offices throughout all project phases. When it comes to the construction phase, the grievance boxes are also going to be placed at the construction site (in addition to the grievance boxes which are going to be available at the local Municipality Offices), whereby grievance boxes shall be placed at the location of construction camps, i.e. at the on-site office of the main contractor.

SRI will establish a channel of communication with the affected municipalities that will forward directly or through SRI CLOs to the SRI PIU all relevant grievances received from the local residents or organizations. Logging a grievance with the GM does not preclude or prevent seeking resolution from an official authority, judicial or other at any time provided by the Serbian legal framework (courts, inspections, Ombudsman etc.).

Received grievances will be registered in a Grievance Registry Log and acknowledged within 7 days of receiving logging. The grievance classifying will be based on the characteristics of the grievant (e.g., vulnerable groups, persons with disabilities, etc) and the nature of the grievance.

Once logged, PIU Environmental and Social Impact Project Manager who is responsible for coordinating grievance mechanism will conduct a rapid assessment to verify the nature of grievances and determine on the severity. Within 7 days from logging, the grievances will be assigned to competent expert or department within SRI, or Consultant, or Supervising Engineer, while the grievant will be acknowledged that the case is registered and shortly informed on planned actions and responsible unit (expert). The grievance will then be investigated in the manner that efforts will be put into understanding the issue from the perspective of the grievant and understand what action he/she requires. The department responsible for the topic of the grievance will investigate the facts and circumstances and articulate an answer to the grievant. The grievant should be informed about the final decision no later than 30 days after the receiving of the grievance. Closing the grievance occurs after the implementation of the resolution has been verified. In case of emergency situations, all phases of this process will be shortened as much as possible.

The decision will give a clear assessment on the grievance, clear ruling and recommendations for fair remedy and propose measures to modify future conduct that caused the grievance as well as proposed measures to compensate if mitigation measures cannot remedy the harm or injury. The decision will be in writing and will be delivered to the person who filed the grievance as well as to any other person or entity to which the recommendation and measures will apply or is under obligation by Law. If decision is accepted by grievant (or if it is found necessary to be urgently solved by the responsible department) and if there is a possibility for raised issue to be solved, the PIU Environmental and Social Impact Project Manager will react promptly and effectively.

Grievances can be filed anonymously. In case of anonymous grievance, the SRI's PIU Environmental and Social Impact Project Manager will investigate the grievance and issue the final decision that will be disclosed on the bulletin board when the grievance was submitted.

The SRI PIU will keep a Grievance Registry Log, which will include grievances received through all admission channels, containing all necessary elements to disaggregate the grievance by gender of the person logging it as well as by type of grievance. The personal data of each grievant will be protected under the Data Protection Law.

Stakeholders are encouraged to send all grievances, concerns and queries to the contact points below:

Table 10: SRI PIU Contact Details

Description	Contact details
Implementing agency:	Serbia Railways Infrastructure
Main contact:	Ana Kopren PIU Environmental and Social Impact Project Manager
Address:	Nemanjina 6, Belgrade 11000, R. Serbia
E-mail:	ana.kopren@srbrail.rs infobgnis@srbrail.rs

7.3 SRI PIU responsibilities, monitoring and reporting on grievances

The SRI PIU will be responsible for:

- Managing the GM procedure;
- Maintaining the Grievance Registry Log on the complaints received;
- Exchange information with affected municipalities and (sub)contractors about raised grievances;
- Summarizing and analysing the qualitative data and disclosing semi-annual GM reports to PIU/EIB/EBRD;
- Monitoring outstanding issues and proposing measures to resolve them.

The semi-annual Project reports to EIB and EBRD will include a section related to grievance mechanism which provides updated information on the status of mechanism implementation as defined in this SEP.

8. MONITORING AND REPORTING

Reporting back to stakeholders

In terms of reporting, the SRI will establish a channel which is going to be used for reporting back to the communities and individuals impacted and concerned.

Information on public engagement activities undertaken by the Project should be conveyed to the stakeholders by publication of a standalone semi-annual report on Project's interaction with the stakeholders - disclosed on the SRI's website and affected municipalities' websites (if applicable). This report will include the number and type of consultations and meetings, as well as the topics discussed and actions taken, the number of grievances received within the reporting period and the number of those resolved within the prescribed timeline, the number of press materials published/broadcasted in media.

SRI shall also maintain regular feedback-related communication with the local communities. These feedback loops shall be used as means for incentivising community acceptance and improving community interaction in relation to the overall project. SRI will make available relevant information to the stakeholders on how their views have been incorporated or otherwise addressed during the Project design and planning of the construction phase, along with any mitigation and/or compensatory/remedial measures, or the reasons against accepting their requests.

The Expert Team will support SRI in preparation of reports until the end of the Main ESIA stage (i.e. until RAP adoption).

8.1 Reporting to EIB and EBRD and internal reporting in SRI

SRI is required to monitor the implementation of this SEP and the functioning of the grievance mechanism, as well as to report on both to EIB and EBRD. After signing the loan agreement, the SRI will be responsible for preparing monitoring reports, documenting the environmental and social performance of the Project and submitting them to the EIB and EBRD on semi-annual basis. These will be part of the overall progress reporting requirements as set forth in the respective finance contract.

The reports will include sections dedicated to the stakeholder engagement and grievance mechanism. Table 5 proposes a comprehensive set of indicators related to stakeholder engagement performance. The achievement of these indicators will rely on information from the Stakeholder Engagement Log and the Grievance Registry Log.

Periodic summaries and internal reports on public grievances, enquiries or incidents, together with the status of implementation of associated corrective/preventative actions will be collated by the PIU. The PIU will use this information to identify areas in which stakeholder engagement should be strengthened, and where additional financial or human resources and training are needed. PIU will properly inform the SRI management, as internally agreed within the SRI.



Table 11: Monitoring Indicators (Stakeholder Engagement Performance Indicators)

Indicator	How will it be monitored	In charge	Frequency
Engagement with affected parties			
Number, date and location of meetings/consultations with PAPs and numbers of participants on the meetings	Minutes Meetings	SRI PIU	Semi-annual
Vulnerable groups/individuals reached with Project information; number, date, location and type of meetings/communication with vulnerable groups/individuals	Minutes meetings and surveys	SRI PIU	Semi-annual
Number of men and women that attended each of the meetings	List of Attendees	SRI PIU	Semi-annual
For each meeting, number and nature of comments received, actions agreed, status of those actions and how the comments were included in the Project E&S management system or Project design	Minutes Meetings	SRI PIU	Semi-annual
Engagement with other stakeholders			
Number and nature of engagement activities with other stakeholders, disaggregated by category of stakeholders (NGOs etc.)	Minutes Meetings	SRI PIU	Semi-annual
Grievance Mechanism			
Number of grievances received disaggregated by complainant's gender and means of receipt (telephone, e-mail, discussion)	Grievance Log	SRI PIU	Semi-annual
Number of grievances received from affected people and external stakeholders	Grievance Log	SRI PIU	Semi-annual
Number of grievances which have been (i) opened, (ii) opened for more than 30 days, (iii) those which have been resolved and closed (iv) number of responses which didn't satisfy the complainants (v) number of grievances sent to the court/other state bodies.	Grievance Log	SRI PIU	Semi-annual
Average time of complaint's resolution process, disaggregated by gender of complainants and categories of complaints	Grievance Log	SRI PIU	Semi-annual
Trends in time and comparison of number, categories, and location of complaints with previous periods	Grievance Log	SRI PIU	Semi-annual



ANNEX 1: GRIEVANCE FORM

Reference Number:

Full Name

Note: you can remain anonymous if you prefer or request not to disclose your identity to the third parties without your consent. In case of anonymous grievances, the decision will be disclosed at the local bulletin board where the grievance was submitted.

First name: _____, Last name: _____

☐ I wish to raise my grievance anonymously

Gender of complainant (completion of this field is optional)

☐ Male ☐ Female ☐ Other _____ (please indicate)

☐ I request not to disclose my identity without my consent

Contact Information

Please mark how you wish to be contacted (mail, telephone, e-mail).

☐ By Post: Please provide mailing address:

☐ By Telephone: _____

☐ By E-mail: _____

☐ I want to remain anonymous

Preferred Language for communication ☐ Serbian ☐ Other _____ (please indicate)

Description of Incident or Grievance (What happened? Where did it happen? Who did it happen to? What is the result of the problem? How would you like the problem you are reporting to be resolved?)

☐ One-off incident/grievance (date dd/mm/ 202_) ☐ Happened more than once (how many times? ____)
☐ On-going (currently experiencing problem)

Signature: _____, Date: dd/mm/202_

SRI Contact:

Serbia Railways Infrastructure
Ana Kopren
PIU Environmental and Social Impact Project Manager
Nemanjina 6, Belgrade 11000, R. Serbia
ana.kopren@srbrail.rs
infobgnis@srbrail.rs



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